ESG 2015–2018 ENQA AGENCY REPORTS: THEMATIC ANALYSIS

CARMEN TOMAS AND MARIA KELO

01 APRIL 2020

enqa.

European Association for
Quality Assurance in Higher Education

Written by: Carmen Tomas and Maria Kelo

Edited by: Anthony Jasper

Brussels, Belgium, 2020

ESG 2015–2018 ENQA AGENCY REPORTS: THEMATIC ANALYSIS

CONTENTS

EXECUTIVE SUMMARY

A thematic analysis of ENQA's agency review reports has provided insights into main agency practices, best practices and existing limitations in relation to the standards 3.4, 3.6 and 2.1 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (the "ESG"). In total, 27 agency review reports have been considered in this analysis. The sub-themes for analysis have been defined based on the descriptors found in the ESG and the analysis has focused on identifying approaches based on descriptions provided in the external review reports of the 27 agencies. Panels' commendations and compliance levels have been used to identify and define good practice. Recommendation sections have provided insights into limitations in compliance with the ESG.

ESG 3.4 THEMATIC ANALYSIS

This standard requires agencies to systematically use outputs from their accreditation and quality assurance activities (mainly reports), whether programme and/or institutional reviews, for analysis to infer developmental and enhancement needs in the sector. Agencies are expected to take account of local, national and international contexts in their analyses. The effectiveness of agencies' approaches to meet this standard is variable. Effective approaches combine:

- creating general summaries and overviews from their output reports of quality assurance activities
- creating additional thematic reports on selected specific topics (generally derived from the ESG).

Gathering additional information and expanding the intelligence on sector needs is also done by fostering partnerships with other national bodies (e.g. national statistical agencies, ministries, and others), or international projects. This third element identified in agencies' approaches is regarded positively where agencies have the fundamental elements already in place (detailed above). However, a subset of agencies report additional gathering of evidence or external projects as the main focus of thematic analysis that, in most cases, fails to meet the requirements of the standard in a strict sense. Within this group, it is also quite common to mistake thematic analysis with requirements related to ESG 3.6, i.e. processes and methods in place for internal quality assurance of the agencies.

The main aim of thematic analysis is to reflect and identify trends and actions for improvement or development in the sector. Information provided in the external review reports on this element is however often sparse. Examples of actions highlighted revolve around the development of quality assurance processes in new areas or improving existing ones. Overall, regarding ESG 3.4, the main emphasis by agencies is placed on data gathering or summarizing of information. Reflection on findings and identification of actions are meanwhile less evident in the reports.

All agencies have dissemination activities in place for their thematic analyses. Annual bulletins and reports are quite typically published on websites, and many agencies complement their activities with seminars, which are a similar way of engaging stakeholders in the analyses. Conferences and journal articles are also part of the dissemination activities in some agencies, although this is less common. How the selection of topics for thematic analyses is done is not discussed clearly in the reports, but occasionally it is mentioned that the ESG provide a guideline to their form and content.

Resource-related issues to meet this standard's requirements are not always explicit in the external review reports. Where information is provided, two main approaches are identified: 1) internally resourced but with no specific unit (or this is not specified) and 2) where an internal unit is created with specific

responsibilities for analyses. External commissioning or reliance on external projects has also been mentioned as a way of resourcing the production of thematic analyses.

The main barriers discussed in the external review reports (to be found in the sections on analysis and recommendations in particular) are: understanding the requirements and meaning of the ESG 3.4; resources and cost; and systematicity of analyses and follow-up actions. Particular context-specific limitations are observed in the case of agencies that have been recently set up, operate across several countries (e.g. AAQ), or lie within countries with multiple agencies operating in the field of higher education quality assurance (e.g. The Netherlands, Denmark).

ESG 3.6 Internal quality assurance and professional conduct

This standard deals with an agency's accountability to its stakeholders, maintenance of professional standards, and the review and improvement of the agency's activities. All agencies report having related policies that are published online, as well as accompanying guidelines and quality manuals.

Effective approaches to internal quality assurance (IQA) are characterised by the consideration of a comprehensive list of stakeholders and their engagement in providing feedback to the agency on its activities. Types of approaches identified by agencies are: internal feedback mechanisms, review mechanisms embedded as part of the agencies' activities, surveys of external stakeholders, having stakeholder representation in meetings or decision-making and lastly, holding events to gather different groups of stakeholders to discuss the work of the agency.

Information on the impact of the IQA activities in the external review reports is sparse. A few reports comment on specific actions (e.g. communication activities, expert panel composition, IQA processes, training). Dissemination of stakeholder feedback is commonly considered.

Agencies deploy a variety of approaches to resource the workload associated with this standard. Some agencies distribute tasks across staff/units in the agency, while others create dedicated units. A few agencies outsource this activity to external entities or reviewers.

The most common limitations observed in the agency review reports are: absence of documentation on the IQA system used (policies, guidelines, manuals); insufficient collection of feedback from stakeholders; and the absence of formalized procedures for following up on feedback and training.

ESG 2.1 Consideration of internal quality assurance

This standard establishes the basis for an agency's external quality assurance of institutions and ensures that the standards of Part 1 of the ESG are covered in the agency's processes. The scope of this standard is very broad. In addition, given the variability in detail and style across the external review reports, it has been challenging to identify specific effective approaches by agencies in meeting the requirements of this standard. Mapping of the standards of the ESG Part 1 to agency procedures is common to all reports and tends to be complete, except for very few cases in which some specific procedure was missing from the mapping. Depending on the agency, a variety of mechanisms are reported. Most of the time, programme and institutional quality assurance activities are addressed via separate mechanisms, except for a few agencies where these are related. Lastly, an analysis of the recommendations across all agencies shows that the most problematic standard for agencies to verify through external quality assurance activities is standard 1.3 (Student-centred learning).

INTRODUCTION

The revised *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (the ESG) were adopted in 2015. Four years into the implementation of the ESG, ENQA conducted a review to gain insight into how the requirements of some of them are being met and what the state of the art in higher education quality assurance across Europe currently is. The anaylsis was principally carried out by Dr Carmen Tomas, Higher Education Consultant, in cooperation with Maria Kelo, Director of ENQA.

Three particular standards were chosen for their known complexity and for the difficulty that agencies face in achieving full compliance in each, namely:

- 3.4 Thematic analysis
- 3.6 Internal quality assurance and professional conduct (a new standard introduced in 2015)
- 2.1 Consideration of internal quality assurance.

Three main questions guiding the analysis are:

1. What are the common approaches deployed by agencies in relation to ESG 3.4, 3.6 and 2.1?
2. Are there identifiable good practices?
3. What are the main barriers for agencies in developing their approaches in line with the requirements of the ESG?

SAMPLE AND PARAMETERS FOR INCLUSION OF REPORTS IN THE ANALYSIS

The ENQA agency review reports online archive has been identified as the main source of information for the current analysis. The reports included in the analysis fulfil the following criteria:

- reviews of national and regional (Spain) agencies
- reviews conducted by ENQA
- reviews against the ESG 2015
- reviews that covered ESG 3.4, 3.6 and 2.1 (excluding some partial reviews)

Subject-specific agencies were excluded from this analysis (e.g. veterinary or chiropractic education). Initially 27 reports met the above criteria. However, one report (NAA) was dismissed as it was for a partial review and did not include the three key standards considered in this analysis. Lastly, the AAQ report had a different format with only 3.4 being identified as consistent. In total, 25 reports are fully included and consistent with all criteria. For standard 3.4, 26 reports were included. Throughout the report, the agencies are referred to by their acronym. Full agency names and country can be found in Appendix 1 of this report.

AGENCY REVIEW REPORTS AND THEMATIC ANALYSIS

The approach of this analysis is qualitative and mainly focuses on themes relevant to the requirements of the included standards. The initial consideration of themes for analysis was done based on a few key sources, namely:

- ENQA agency review reports and decisions[1]
- *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (the ESG). (2015). Brussels, Belgium[2].
- *ESG 2015 – ENQA understanding and expectations. Results of the ENQA IQA group work* (2015 – internal document), in which previous research identifies the types of evidence that can be submitted

The themes identified in the descriptors for each ESG standard provide a set of broad themes to guide the analysis. The exact breakdown of themes for each standard has been discussed with the Director of ENQA. The themes have also been refined by taking into account the scope and nature of the information available in the reports.

The use of reports that were created as a result of an external quality assurance activity as source of information, rather than conducting a data-gathering exercise, poses some challenges to a valid analysis. Reporting styles and level of detail for each report is subject to some variability. Whilst this was appropriate for the initial purpose of assessing an agency's compliance with the ESG, it presents limitations to the nature of our thematic analysis and that validity of results.

Numerical summaries in relation to themes or practices are not provided as these may be misleading or inaccurate. Initially, a quantitative approach to analysis and the practices in agencies was considered. For example, identifying how many agencies adopted a particular approach. The variability in the reporting style and level of detail provided makes it impossible to assume confidently that absence of a defined theme in a given report could be accurately interpreted as the agency's real practice. Some reports are clearly sparser than others in the detail provided. In consultation with ENQA's Director, broader themes were derived from the ESG descriptors with a focus on identifying key practices, and this is seen as a more appropriate level for analysis.

All sections in the agency review reports for each of the selected standards (evidence, analysis, conclusion, commendations, and recommendations) have been considered. Both evidence and analysis sections have been used to extract detail on the agency approaches to each standard. In order to identify good practice, compliance levels of the agencies in relation to each standard and analysis sections were used to identify what was considered praiseworthy by panels. Panel commendations and praise have been noted to identify good practices. Lastly, panel recommendations have also been analysed to identify areas for improvement and observed contextual limitations for each standard.

Bearing in mind the focus of the analysis and observed limitations, the focus of analysis has been to identify the spread and variety of approaches adopted to meet the requirements for each standard. This thematic analysis is purely qualitative, focusing on the identification of the main types of approaches. Practices and approaches adopted by agencies are identified. Lists of agencies associated with a particular approach might not be exhaustive. It is possible that other approaches may be in place but were not mentioned in the external review reports.

THEMATIC CODES FOR ESG 3.4

Based on the descriptors of ESG 3.4 (see Appendix 3) and the consideration of an initial subset of reports, the broad themes chosen for analysis consider a range of elements that were observed in agencies' approaches to meet the fundamental requirement of thematic analysis, with varying degrees of success or levels of compliance:

---

[1] From: https://enqa.eu/index.php/reviews/review-reports-and-decisions/
[2] From: https://enqa.eu/index.php/home/esg/

- The systematic use of quality assurance reports for analysis
- Thematic reports on specific topics
- Additional gathering of information (via internal or external projects and possibly involving other parties such as other national institutions or bodies)
- Plans for more systematically developing thematic analysis
- Ineffective approaches – not meeting the requirements of ESG 3.4

A set of additional themes was also established:

- Reflection and actions following up on findings from thematic analyses
- Dissemination: main modes and consideration of stakeholders
- The allocation of resources for this activity
- Limitations and barriers

THEMATIC CODING FOR ESG 3.6

Informed by the ESG (see Appendix 3) and the agency review reports, the themes have been refined over time, departing from the guidance while also adding codes based on the observed main themes. These themes are:

- Policy, manuals and operational guidelines on IQA
- Internal and external feedback mechanisms
- Impact of IQA reviews: effectiveness, improvements, and publication of IQA reports
- Resourcing the work for IQA
- Limitations and barriers

THEMATIC CODING FOR ESG 2.1

Developing thematic codes for this standard has been challenging. Three key codes have been identified:

- Mapping of agency procedures to ESG part 1
- Whether programme and institutional reviews operate separately or are interdependent
- Limitations and barriers

ETHICS

The agency reports used are already in the public domain (ENQA's website). Agencies are not anonymized since the specific objective is to identify effective agency approaches in meeting the requirements. No ethical concerns were identified with the proposed use of public information.

SECTION 1 THEMATIC ANALYSIS ESG 3.4

Approaches to meeting the requirements of ESG 3.4 include some or all elements listed below:

- The systematic use of quality assurance reports for analysis;
- thematic reports on specific topics;
- additional gathering of information (via internal or external projects and possibly involving other parties such as other national institutions or bodies).

These are detailed in separate subsections below. One subsection addresses an observed approach emerging from the analysis, while another details various approaches employed that fell short of meeting the requirements. Further subsections describe various aspects of dissemination methods and impact.

The most effective agencies[3] – those considered as fully compliant with this standard – cover all three of the above-mentioned elements in their approaches.

1.1 SYSTEMATIC USE OF QUALITY ASSURANCE REPORTS FOR ANALYSIS

The first element consists of the systematic use of the outputs (reports) of their (routine) external quality assurance activities (both programme and institutional) as the basis for thematic analysis. The outcomes may be reported in annual publications aiming at summarising agency activities or as summaries of quality assurance activity outputs (reports), generally aiming to identify good practices and areas for improvement. The use of the phrase "thematic analysis" has different meanings for different agencies, but a common interpretation is to summarise key recommendations from a number of reports, or to carry out some comparative analyses. These analyses generate insights into good practices, and areas for further development.

In the case of agencies that are substantially compliant with the ESG 3.4[4], several limitations are found. While undertaking significant work, some agencies list a range of report types published by the agency (e.g. specific programmes, surveys, annual report, meta-evaluation), which are however not considered by the review panels to be fully aligned with the standard's requirements for mainly the following reasons:

- Analysis may not be systematic enough or sustained. In some cases, while the work was recognised to have impact, the observed limitation was a lack of systematicity (e.g. ANECA), while in other cases the panel observed lower activity levels due to periods of heavy workloads or intense activity for the agency (e.g. ACPUA)
- Lack of clarity of the meaning of "thematic analysis". In the case of some agencies (e.g. EKKA), the panel considered that the agency did not fully understand the purpose of thematic analysis.

1.2 THEMATIC REPORTS ON SPECIFIC TOPICS

Secondly, in addition to well-established summary reports (e.g. system-wide analyses, annual reports that include thematic analyses) providing overviews of main activities, highly effective approaches also include additional thematic analyses. The approaches are varied and may include one or more of the following:

---

[3] NEAA, QAA, AEQES, ASHE, AI, HEA, ARACIS
[4] ANECA, ACPUA, IAAR, EKKA, HCERES, PKA, AQU, QANU

- Analyses on specific topics (e.g. QAA thematic reports on themes emerging from QAA review offering guidance; ASHE analysis on medical science programmes);
- Case studies of good practice (e.g. QAA institutional submissions of good practice);
- Follow-up of projects (e.g. AI)[5];
- Seminars[6].

AEQES' approach to thematic analysis was commended by the panel as a particularly good practice:

AEQES
On the Agency's website, different types of analyses can be identified: system-wide analyses, "meta-analyses" and other types of thematic publications.

System-wide analyses have been presented, published, and disseminated. These analyses result from programme evaluations in clusters. Cluster types are:
- a programme organised by several types of educational institutions;
- several programmes related to the same subject field, organised by one type of educational institutions;
- several programmes organised by several types of educational institutions.

The meta-analyses published by AEQES are: TRENDS, FOCUS and PATHWAYS.
TRENDS is focused on seven recurring themes found in the evaluations conducted in 2009-2010: visibility and opportunities, the trend for professionalisation in education, the design and the monitoring of programmes, the development of competency frameworks, the place of research in HEIs, the place of foreign languages in the educational processes, and the resources.
FOCUS publications examine six themes from the evaluations conducted in 2010-2012: the evolution of societal needs and the updating of programmes, the flexibility of students' routes, teacher training, research, autonomy vs regulation, quality assurance methods and cultures.
PATHWAYS focuses on the degree of appropriation of the ESG by the institutions.

1.3 ADDITIONAL GATHERING OF INFORMATION

Gathering additional information (e.g. through additional surveys) is identified as an effective approach when conducted in addition to the two elements above. This element appears in several reports (e.g. NEAA, QAA, AEQES, ASHE, AQU, ANECA, ACPUA, IAAR, HCERES, ARACIS). The nature of additional data gathering is highly contextualised and varies, ranging from reports requested by funding bodies (e.g. HER in the UK) to additional surveys on the opinions of stakeholders (e.g. AEQES), the publication of analysis on generic education themes (students' study time, labour market needs, etc.)(e.g. AI). On

---

[5] For illustration, AI introduced several projects covering areas that it had identified as relevant and challenging themes for HEIs. Some themes were identified through the external quality assurance processes.

[6] As a way of example, AIC organises thematic seminars for institutions of higher education, experts and other stakeholders on the issues of quality assurance in higher education to identify specific topics that are important for the higher education community in Latvia. The topics are directly related to the different standards of the ESG Part 1 and the content and outcomes of the seminars are elaborated in summary reports such as on student-centred learning in Latvian HEIs, published in 2017 (ESG 1.3); internal quality assurance systems (ESG 1.1); and design, approval, monitoring and revision of study programmes (ESG 1.2, ESG 1.9). The seminar on student-centred learning led to a national level survey conducted by AIC and a report on the implementation of student-centred learning approaches and good practice in this area is published on the website of the agency.

occasions, this extra work is done in partnership with third parties (e.g. in the context of international projects, or in cooperation with ministries or other agencies) either supporting the additional activity or requesting it. An example of this is found in QAA (in the UK), which works in partnership with JISC (Joint Information Systems Committee) and HESA (Higher Education Statistics Agency) for the Business Intelligence Analytics Lab.

1.4 AGENCIES WITH PLANS FOR DEVELOPING THEMATIC ANALYSIS MORE SYSTEMATICALLY

In these cases, a less effective approach includes a variety of outputs that show generally a reliance on external international projects. Some agencies approach this standard by using exclusively other sources of information, not the output reports of external quality assurance activities. Examples of this are seminars or purpose-built surveys (e.g. ARACIS, AIC). Uses of these additional sources, instead of the analysis of outputs from the main external quality assurance activities, tends to indicate some confusion with the requirements of the standard ESG 3.6 (e.g. AIC in Latvia presents how the agency deals with internal enhancement [i.e. review of own procedures] under thematic analysis). In some cases, in fact, the reports focus on the agency's activities, rather than on analysing good practice or common trends in the sector, by using tools such as stakeholder surveys aiming at improving the effectiveness of their own assessment exercises. Effort is directed at gathering additional evidence and stakeholder feedback on the agency's activities. Agencies in this category presented a promise and plans to develop a more systematic use of routine output reports from external quality assurance activities for future analyses.

1.5 INEFFECTIVE APPROACHES – NOT MEETING THE REQUIREMENTS OF ESG 3.4

Consideration of additional sources of information and reports is regarded positively when this is done in addition to the basic requirements described above (e.g. accountability purposes, evaluation of effectiveness of own procedures). This is the case for example in ASHE where in addition to analyses, additional gathering of information supports evaluating national system-wide needs (e.g. doctoral training), which took place at the request of the ministry and stakeholders.

At the same time, several agencies fail to meet the fundamental requirements of ESG 3.4, and often, it seems, there is a lack of understanding on what is required within this standard. A less effective approach includes a variety of outputs that show generally a reliance on external international projects. Some examples are:

- quite a lot of activity and reporting but with no clear purpose of action or no clear focus on the system-level issues (e.g. RS HEAA; SKVC);
- the reliance on external bodies or projects for analyses and the absence of a proactive and systematic use of outputs of agency's routine reporting activity (e.g. PKA);
- the lack of understanding of the nature, role and function of thematic analysis for future activity (e.g. NVAO);
- being responsive rather than proactive – thematic analysis only produced on request of e.g. ministries (e.g. NVAO).

1.6 REFLECTION AND ACTIONS FOLLOWING FINDINGS FROM THEMATIC ANALYSES

Part of the descriptor specifies that findings from thematic analyses can contribute to reflection and

improvement of policies and processes. This element surfaces less frequently in the agency review reports. Impact is frequently identified with stakeholder feedback during ENQA visits offering support or validating the important role and contribution of the agencies in the development of the HE sector. Specific actions were found in a few reports (e.g. AIC, ASHE) with varying topics in focus. For example, ASHE identified the improvement of doctoral study programmes, and AIC identified demands on procedures and methods of accreditation. Based on the agency review reports, it is not possible to identify any systematic examples of reflections and identified improvements resulting from thematic analysis activities. Even in cases of agencies where specific units are proactively conducting surveys, systematic reflection on findings is either not reported or absent.

1.7 DISSEMINATION: MAIN MODES AND CONSIDERATION OF STAKEHOLDERS

Common dissemination methods of thematic analysis activities are:

- Reports and summaries published via agencies' websites

The most common method of dissemination of thematic reports, annual analytical reports, and case studies is the agency's own website. Documents are typically translated into English (with few exceptions).

- Seminars or forums (e.g. NEAA, AI, ACPUA)

The role of seminars or workshops related to thematic analysis is diverse. Some use such events to discuss results from external quality assurance activities or promote a shared understanding on quality and quality criteria. When agencies used seminars to promote a shared understanding, this was commended by the external review panel (e.g. ACPUA).

- Use of other regulators for wider dissemination (e.g. Accrediting Council in NEAA)

An example is offered below of a comprehensive dissemination strategy in relation to ESG 3.4.

QAA (United Kingdom) – Dissemination strategy
QAA generates a relatively large number of documents related to thematic analysis. There are four main formats of analysis that QAA produces: 1) summary-type annual reports on activities and their outcomes, 2) main findings from reviews, 3) thematic reports on selected subjects of interest and patterns identified during reviews, and 4) case studies of good practice in higher education.
For their dissemination, the following actions are taken:
- films are created
- news is disseminated via social media (Twitter, Facebook, Flickr, QAA News, RSS, and YouTube)
- the QAA Viewpoint series tackles selected important topics in higher education and offers the agency's opinion on them.

The majority of publications are in electronic format, with some in paper versions.
QAA owns and maintains three websites, found at the following addresses:
• http://www.qaa.ac.uk – the main website for QAA the agency
• http://www.enhancementthemes.ac.uk/ – supported by QAA Scotland
• http://www.accesstohe.ac.uk/Pages/Default.aspx – devoted to Access to Higher Education courses in England and Wales.

Analyses, reports, and publications are often accompanied with other forms of professional dialogue within the higher education community. These often include policy briefs (such as the most recently published overview on the future shape of the UK Quality Code, currently under review), conferences, seminars,

---

etc. QAA also uses the Knowledgebase system to keep records of all its findings (recommendations, affirmations, and features of good practice) and offers opportunities for advanced search in various aspects.

1.8 ALLOCATION OF RESOURCES TO THEMATIC ANALYSES

Conducting thematic analysis is widely recognised as a resource-intensive activity. Where specified, agencies demonstrated a variety of approaches to organising and resourcing associated duties. Resource constraints are commonly raised as a limiting factor in meeting the standard's requirements. However, some agencies have been commended for conducting much work in this area despite the workload, scarce resources, and in some cases even recent creation of the agency (e.g. AIC). The level of detail provided in the evidence section of reports on the resourcing of associated activities is variable. The cases below provide an exploration of the types of approaches agencies adopt in resourcing tasks associated with ESG 3.4:

- Tasks are not allocated to specialised units (e.g. ACPUA, QAA, AEQES, SKVC). Models of resourcing vary from cooperation with other regional agencies (e.g. ACPUA, QAA, AI and EVA) to drawing from existing internal resources such as working groups (e.g AEQES) or staff (e.g. SKVC)
- Dedicated units exist with the specific purpose of conducting thematic analysis (e.g HAC plans on establishing a new unit; ASHE).

1.9 LIMITATIONS AND BARRIERS

Common limitations in the agencies' approaches to ESG 3.4 are:

- (Mis)understanding the requirements of thematic analysis (what it means)
- The lack of established mechanisms for systematic analysis of outputs from regular external quality assurance activities (e.g. AI, AAQ, HCERES)
- The cost intensity of the activity and (the lack of) financial resources available to the agency (e.g. NQA, IAAR)
- The lack of effective dissemination (e.g. EKKA, HAC).

Other challenges specific to the context of some agencies are:

- Cross-country imbalances: AAQ works across countries (Switzerland, Germany, Austria) and operates more in one country than in the others
- The interplay of multiple agencies: In some countries, the existence of multiple agencies (e.g. NVAO, NQA and QANU in the Netherlands; AI and EVA in Denmark) leads to restrictions on who can do/should do thematic analysis, which may also lead to a lack of clarity or ownership.
- An agency's history: recently established agencies (e.g. AIC, FINEEC, IAAR), or agencies that have only recently started quality assurance activities, may not (yet) have had sufficient time or a sufficiently large number of reports to perform meaningful analyses or to integrate the activities as part of its regular workplans (e.g. SKVC, AIC).

SECTION 2 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT ESG 3.6

This standard outlines an agency's accountability to its stakeholders, maintaining professional standards and the review and improvement of its (evaluation) activities. The first three sections offer details on the main requirements of this standard (policy, feedback mechanisms and impact). Approaches to finding resources and barriers to achieving full compliance are also analysed.

2.1 POLICY, MANUALS AND OPERATIONAL GUIDELINES

The first basic requirement to meet this standard is for agencies to have clear and published policies and quality manuals describing the IQA processes in place. This descriptor indicates that agencies' IQA policy documents should consider a variety of aspects (e.g. training, ethics, external and internal feedback mechanisms, communication, non-discrimination, and subcontractors). In this case, the level of detailed evidence in the agency review reports varies.

Agencies describe a variety of document types in order to meet this requirement, and publication on the agencies' websites is common. Agencies create policies, manuals and guidance on processes in line with their objectives and policies. Quoting the existence of such variety of documentation and publication on agency's websites is common (NEAA, AIC, QAA, ANQA, AEQES, ASHE, ARACIS, FINEEC, EKKA, ANECA, SKVC, HAC, NVAO, IQAA, HEA, IAAR, HEAA, RS HEAA and AQU), except for cases of confidential reports (e.g. financial reports QAA). However, despite this being a basic requirement, in a few cases the agencies either do not publish their IQA policy (HCERES) or do not have a written policy (QANU).

Some agencies frame their policies and processes on the Plan-Do-Check-Act (PDCA) cycle (e.g. QAA, ANQA, AEQES). Some agencies refer to specific quality assurance frameworks at various levels to develop their processes for quality management:

- European: ECA Code of Good Practice (ANECA)
- International: ISO 9001 Standards (ASHE; AQU; ACPUA)
- Local (Common Assessment Framework of FINEEC; AQU Catalunya's quality and information security policy; Process and Measurement System PMS at AIC; Total quality management principles TQM at HEA).

The nature and scope of the different types of documents (e.g. policies, manuals and operational guidelines) differ, and no specific approaches were found. Quality manuals quite typically exist in addition to policies or sometimes overlap with policy statements (e.g. AIC, AEQES, EKKA, IAAR, HEA, RS HEAA).

Detailed operational guidelines and the concrete implementation of the QA policies are usually specified by agencies that fully comply with this standard. In such cases, evidence of the existence of operational guidelines, accountability processes, training, reporting and monitoring is provided (e.g. QAA, ANQA, NEAA, AIC, ARACIS, ANECA, AQU, PKA). The agency review reports vary in the extent of the detail of the operational guidelines, implementation and monitoring mechanisms. Several reports describe operational guidelines in these terms: *"instructions and procedures for internal processes and public review guides for all external quality assurance activities the agency performs"* (AQU, 3.6 evidence).

By way of illustration, IAAR's IQAS Manual was commended by the review panel. It outlines a comprehensive system for the internal organisational quality management of the agency, summarising and referring to 43 other policy documents to give a full overview of the agency's internal policies and systems. Among the quality-related aspects addressed are:

- documentation management
- records management
- internal communications
- the organisation and servicing of the agency's councils
- staff responsibilities and authority
- resource management
- workplace and environmental quality
- process analysis
- planning cycle
- project management and research and development.

The system draws attention to indicators for process measurement and evaluation linked to action planning. There is a commitment to a clear development strategy supporting constant improvement.

2.2 INTERNAL AND EXTERNAL FEEDBACK MECHANISMS

Part of reviewing the effectiveness of an agency's activities depends on reliable and purposeful internal and external feedback mechanisms. Panels positively evaluate agencies that gather feedback from multiple sources, methods and stakeholder groups. One such example is NVAO, which was described as having a "mature system". More details are given below to provide an example of how an agency might approach gathering stakeholder feedback in a comprehensive and systematic manner.

Internal quality assurance at NVAO operates both at a strategic and operational level. Inputs for the strategic level are, for instance, recommendations by ENQA-reviews and preferences expressed by stakeholders in formulating the contours of the new (2016) accreditation frameworks and the Strategy document (2017-2020). Inputs for the operational level are, for instance, feedback on NVAO's assessment processes by the online tool SurveyMonkey; discussions with stakeholders, such as the assessment agencies, institutions and student organisations; the NVAO resonance group, which meets twice a year; feedback on a continual basis in consultation with the Advisory Council; the overview of evaluation activities; measures of improvement as formulated in documents; weekly discussions in staff-meetings; peer-to-peer coaching of NVAO-staff; and project process coordination. Based on these inputs, lines of work are improved wherever possible.

The remainder of this section explores methods deployed by agencies to gather stakeholder feedback where this was detailed in the evidence sections of agency reports. In some cases, the detail on mechanisms is not specified in the agency reports used for this thematic analysis (e.g. HAC).

2.2.1 INTERNAL FEEDBACK AND CHECKS – GENERAL AGENCY PROCEDURES

A variety of approaches are reported by agencies to be in use to engage internal stakeholders (i.e. staff) in feedback mechanisms as part of reviewing and improving the agency's effectiveness. A great variety of formal and systematic approaches could be identified including (but not limited to) the following:

- Individual staff reflection (e.g. AIC);
- Staff meetings (e.g. AIC, SKVC, NVAO and IQAA): AIC staff meet and discuss their work together as a team each week, and collectively they gather issues that require improvement and exchange information. SKVC discusses strategic, working and annual activity plans in staff meetings. IQAA collects feedback at regular staff meetings but also holds thematic staff meetings on specific issues;
- Development seminars: EKKA holds internal development seminars (e.g. developing strategic plans);
- Surveys for internal staff (e.g. AQU, SKVC, IQAA, ASHE): AQU reports having a portal for petitions and surveys. ASHE issues an annual survey to the staff and Accreditation Council's members;
- Review mechanisms embedded in the process of accreditation activities: AI emphasises collegial feedback on programme review reports, with experienced employees giving feedback on each programme accreditation report to more junior staff. The director of operations is part of the feedback team. Reports recommending a negative decision require extra meetings. In the institutional reviews, the director of operations plays a more active role and participates in the panel's preparatory meeting and at the site visit. The report is discussed at several meetings where the Executive Director also participates. Beside these discussions on individual programme and institutional reports, there are also biweekly meetings within the programme and institutional evaluation units, and on a monthly basis a meeting with both units participating. AI has also set up internal working groups, to ensure the efficiency of AI's accreditation procedures. These working groups will come up with recommendations on how to improve procedures.

Informal approaches are also found. For example, PKA relies on opinions formulated by members, experts and employees.

2.2.2 EXTERNAL STAKEHOLDERS' FEEDBACK ON AGENCY'S ACCREDITATION AND OTHER ACTIVITIES

The use of routine surveys to gather external feedback (e.g. users, experts, other) during the course of implementation of review activities is common immediately after a review process or after a cycle of reviews (e.g. QAA, ANQA, AEQES, EKKA, IQAA, PKA, HCERES, RS HEAA, PKA). Other agencies report on the use of additional surveys to gather external stakeholder feedback (e.g. AIC, CAQA, SKVC, HEA, IAAR, AQU, NVAO, ASHE, FINEEC).

The use of surveys is not limited to evaluating the accreditation procedures. Surveys are also used to gather views on events (e.g. QAA's annual survey) or on the impact of agency procedures (ASHE's evaluation of the Croatian Higher Education system). The use of online tools is mentioned in some cases (e.g. FINEEC, NVAO, HCERES).

Agencies sometimes follow up on surveys with specific meetings such as focus groups (e.g. ANQA, EKKA, SKVC, ASHE, ANECA, AI, ASHE). These typically involve gathering verbal feedback from experts, staff and other stakeholders. IQAA and PKA report holding regular meetings with various stakeholders for feedback purposes. ANECA was commended by its review panel because the agency holds meetings for the universities and the agency staff involved (jointly and individually for each university). These meetings are held throughout the delivery of the procedures and, on request, may be given a training or advisory format. In certain cases, these meetings may also serve to plan the evaluation activities.

2.2.3 STAKEHOLDER REPRESENTATION IN MEETINGS OR OTHER DECISIONS

Involving stakeholders in particular decision-making processes (e.g. via agency committees) is also considered to be another form of ensuring relevance of the agency's processes, and are thus in some agency review reports. This may include stakeholder engagement in strategy reviews (e.g. AIC, NVAO) and more commonly representation of stakeholders in various committees.

2.2.4 ORGANISING EVENTS TO GATHER ALL STAKEHOLDERS

Organising larger events to gather all main stakeholder groups is often reported. The nature and approach varies, with some examples including:

- PKA holds a Quality Forum.
- SKVC organises several meetings with internal and external stakeholders and international experts to discuss new development in the EHEA.
- AIC organises a number of events and seminars to target particular issues with stakeholders and focus on particular trends and ESG topics.
- AEQES' Executive Unit holds an annual residential seminar to take stock of the previous year, examine how to improve practices, and prepare for the following year.
- ASHE holds meetings and workshops with stakeholders.
- AI holds yearly meetings with the Rectors conference to gather feedback on their activities.
- HEA organises events to target particular stakeholder groups either on its own or with the support of particular projects or international organisations.

2.3 IMPACT OF IQA REVIEWS: EFFECTIVENESS, IMPROVEMENTS AND PUBLICATION REPORTS

The degree of effectiveness or resulting impact of the various IQA mechanisms described above tends to be affirmed by interviews with stakeholders that commended the agencies' efforts during the review site visits. This is very common, with no reports suggesting that stakeholders raised concerns about agencies. While most reports mention that they found evidence of actions following feedback, not all reports specify which type of actions, with only a few reports discussing specific examples of improvements based on the IQA processes. Some of the cited examples of improvements based on feedback include the following:

- Communication with stakeholders: improving communication with stakeholders and institutions (e.g. AIC), monitoring timely distribution of review documents to HEIs and experts (e.g. IQAA), improvement in the formulation of the reports (templates) and providing more information on the national higher education system to international panel members (ASHE);
- Changes to panel organisation and allocation of roles: removal of experts from accreditation panels, changes of panel chairs and reviewing panel composition (e.g. IQAA);
- Improved preparation of experts, panels and interviewees (EKKA, SKVC): EKKA introduced training for experts with a session on interview techniques and provided interviewees of the visit with letters to familiarise them with the procedures (EKKA);
- Changes to assessments, legislation (e.g. EKKA) or methodology (e.g. HCERES);
- Changes to IQA processes: SKVC quotes updates to the manuals and other processes (e.g. management system, external communication, database).

The dissemination of stakeholder feedback is a common consideration as part of the agencies' accountability. The most common approach is the publication of reports derived from stakeholder

feedback on agencies' websites (e.g. IQAA, HAC, HCERES) and annual reports (e.g. NEAA, QAA, AQU, ASHE, HCERES, SKVC) or bi-annual reports (e.g. AEQES). Seminars are also mentioned in some cases (e.g. AEQES). Financial statements are published but less frequently mentioned (e.g. QANU, SKVC), with some agencies keeping those confidential (e.g. QAA). Some agencies publish reports, but the external review reports do not provide further detail on the nature or frequency of publication (e.g. EKKA, ANECA, HCERES).

2.4 RESOURCING THE WORK FOR IQA

This section considers whether agencies have specific resources allocated for the described IQA-related tasks. Agencies vary from employing one individual dedicated to IQA to having a dedicated unit working on it. Sometimes the work on IQA is distributed between a number of individuals who are also charged with other tasks (e.g. SKVC and ACPUA), while other agencies outsource all or part of their IQA-related feedback collection and analysis. For example, NQA and others employ one individual to oversee all IQA processes and the related reports. Other models, such as ANQA, include one person in charge of each of the different areas (11 identified areas). A few examples of the different modalities in which agencies approach the resourcing of their internal quality assurance are provided here below.

2.4.1 DUTIES SHARED ACROSS THE AGENCY

In some cases, duties for IQA are shared across staff of the agency. SKVC describes that internal quality assurance processes are more integrated into the daily activities and thus require the participation of all or most staff.

The internal quality assurance system in ACPUA handles all activities as a whole, setting indicators for each of the processes in order to assess them. The Director reviews these indicators quarterly. The system in place ensures the monitoring and continuous improvement of all processes through a systematic meta-evaluation process after each implementation round. For all evaluation processes, the meta-evaluation includes gathering and analysing all participants' feedback (reviewers, institutions, etc.) through surveys. There are also quarterly meetings of the Quality Committee (formed by ACPUA's Director, one quality assurance technician, and the head of administration) to facilitate follow-up and improvement.

2.4.2 INTERNAL UNIT

A number of agency were identified in the review reports as having an internal unit or specific committees in charge of IQA (e.g. NEAA, ARACIS, FINEEC, ANECA, AQU, HAC, IQAA, HCERES, HEA). Resources range from one dedicated person (e.g. ARACIS) to larger teams. Examples of the duties these departments or units undertake include: feedback analysis, data collection and analysis (e.g. surveys), and making proposals for improvement.

2.4.3 OUTSOURCING

Some agency reports discuss hiring external reviewers (e.g. NQA) or even agencies (e.g. ACPUA, HEA, ASHE, QAA) to perform internal quality assurance duties.

2.5 LIMITATIONS AND BARRIERS

This section summarises the recommendations for improvement given in the agency review reports by

the panels as seen in the analysis and recommendations sections. The main concerns across agencies relate to the development of written policies (e.g. QANU, RS HEAA), detailed procedures (e.g. AI, CAQA, RS HEAA) and consolidation of good practice and tools into handbooks (e.g. HCERES, QANU, IAAR, RS HEAA). Concerns were also raised about the amount of feedback gathered (greater variety, internal or external) (e.g. NQA, CAQA, PKA, IQAA), the level of formal follow-up on feedback (analysis and actions) (e.g. HAC, QANU, NQA, CAQA, IQAA, RS HEAA), as well as the need to formalise procedures for freelance staff and subcontractors (training, conduct) (e.g. QANU, NQA, PKA, RS HEAA).

The following limitations were raised, but discussed less frequently:
- The publication of policies on websites (e.g. HCERES, QANU)
- Consistency of procedures (e.g. not changing procedures each year [IAAR])
- Developing IQA for a greater range of processes (e.g. management, programme accreditations) (e.g. PKA)
- The dissemination of outputs and their usefulness (e.g. IAAR, RS HEAA)
- Collaboration with other agencies (e.g. ACPUA)
- Streamlining processes and documents regulating internal and external work (e.g. HEA, EKKA)
- Evaluating impact to improve processes (e.g. ASHE)
- Regulatory environment constraints (e.g. EKKA)

Resourcing IQA activities and appointing units was discussed as a barrier by three agencies (e.g. CAQA, RS HEAA, AEQES). Only one of these three had recently appointed a unit. One of these agencies, despite recognising resources as a limitation, achieved full compliance (AEQES).

SECTION 3 CONSIDERATION OF INTERNAL QUALITY ASSURANCE ESG 2.1

ESG 2.1 has a very wide scope in that it encompasses all of the ESG Part 1. This standard establishes the basis for agencies' external quality assurance of institutions and programmes in line with the ESG Part 1. Analysing this standard thematically has been particularly challenging due to the various levels of detail provided in different agency review reports. Given this additional complexity, it has not been possible to identify specific good practice.

3.1 MAPPING OF AGENCIES' PROCEDURES TO ESG PART 1

In line with the requirements of this standard, all agencies present mappings of standards/criteria with the standards of the ESG Part 1. In the external review reports of NVAO and AEQES, the agencies are commended for clarity and comprehensiveness of the mapping provided.

3.2 INSTITUTIONAL EVALUATION AND PROGRAMME EVALUATION

Most agencies report having different types of mechanisms for institutional and programme evaluations (e.g. HAC, QAA, CAQA).
In general, reports tend to confirm that panels checked that processes are in place during the visit and that the internal quality assurance mechanisms of an institution are included in the evaluation. Given the variability of the detail in reports, the way in which agencies approach this is highly idiosyncratic, and it has been difficult to establish categories of approaches. Depending on the agency, there may be more than one process or review mechanism (e.g. CAQA has separate standards for initial institutional accreditation, periodic institutional accreditation, periodic programme accreditation, and audits). There are no particular approaches identified as more effective.
It is less common to find agencies that view institutional and programme reviews and as related.

3.3 LIMITATIONS

Drawing from panels' analyses and recommendations, a number of standards from Part 1 are identified as insufficiently addressed. In particular, ESG 1.2, 1.3, 1.4, 1.5, 1.7, 1.8 and 1.9 are mentioned in the recommendations made by panels. Below, each standard is discussed in order of frequency at which it appeared in the recommendations.

Improving understanding, conceptualisation and evaluation of ESG 1.3 Student centred-learning, teaching and assessment is the most frequently identified in recommendations to agencies. Different aspects noted include:

- A limited or poor understanding of the concept (e.g. IQAA, CAQA, RS HEAA, IAAR) and, as a consequence, the associated accreditation standards were not adapted to measure it
- An insufficient treatment of this aspect (e.g. FINEEC, ASHE, AQU, ACPUA)
- The new status of this standard, which was sited as part of the reason for its absence or lack of implementation
- The standard was not mapped (e.g. EKKA).

Panel recommendations to strengthen procedures in relation to ESG 1.4 Student admission, progression,

recognition and certification emerge in four reports. In two cases, the Lisbon Recognition Convention is recommended to agencies (e.g. QAA, CAQA). In relation to ESG 1.4, the recognition of qualifications and prior learning was found to be missing in a few cases (e.g. ASHE, AQU, CAQA).

ESG 1.7 Information management and ESG 1.8 Public information are areas for improvement in AIC, and CAQA. In the EKKA report, these areas are noted as absent in the mapping of standards to agency procedures.

Less commonly identified were ESG 1.2 (in the case of FINEEC, as Finland had not yet adopted a national qualifications framework at that time) and ESG 1.5 Teaching staff in RS HEAA. Lastly, ESG 1.9 features in recommendations only in the case of IQAA, where the panel urged the agency to consider the primary responsibility of institutions for quality in its interpretation of ESG 1.9.

Other general recommendations relate to:
- A greater focus on effectiveness of IQA (e.g. CAQA, IQAA, QANU);
- improving communication with stakeholders (e.g. NQA, QANU);
- offering greater support to institutions to take responsibility (e.g. CAQA, IQAA);
- addressing variability in levels of reporting on standards with greater clarity and guidance to HEIs (e.g. IAAR);
- the concept of learning outcomes and their assessment, as discussed in recommendations to two agencies (e.g. ARACIS and ASHE).

CONCLUSIONS

This thematic analysis of ESG 3.4, 3.6 and 2.1 aimed at providing insights into effective agency approaches to meeting each of these standards, along with their main limitations and barriers. The thematic analysis has identified successful approaches to ESG 3.4, consisting mainly of the systematic analysis of report outputs from agency external quality assurance activities and in gathering additional evidence to support the analysis of the reports. In relation to ESG 3.4, less emphasis is placed on the reflection on findings and follow-up actions overall. The extent to which this absence in the external review reports accurately reflects practice is uncertain. One of the main limitations for ESG 3.4 is understanding the meaning of thematic analysis, with a number of agencies relying on external resources or projects to perform it. It is also quite common to confuse the requirements of ESG 3.4 with those of ESG 3.6.

In relation to ESG 3.6, this thematic analysis has also identified some key elements of effective approaches. Essentially, a comprehensive consideration of multiple stakeholders and diverse mechanisms is especially effective. Within this framework, agencies vary in their approaches on a range of elements (internal and external stakeholders, mechanisms etc.). Discussions on the impact of actions following feedback gathering in agencies is less specific or detailed in the reports.

How agencies organise their work around standards 3.4 and 3.6 is similar in that approaches vary between deploying existing agency staff or relying on external resources (e.g. projects or consultancy). Additionally, a lack of resources is a commonly mentioned barrier, although some agencies reached full compliance with this standard despite a challenge with resources.

Lastly, identifying effective practice in ESG 2.1 has been more challenging due to the variability of reporting styles, detail provided in the reports, and the complex breadth of the standard. In relation to this standard, the use of recommendations sections of the external review reports has revealed a number of standards in Part 1 that are often considered challenging. ESG 1.3 Student centred learning is the most commonly cited standard in recommendations, for a variety of reasons (absence of mapping, insufficient depth).

This thematic analysis has provided an initial insight into observed effective approaches and less effective approaches in relation to the selected standards. However, given the nature of the reports it has not been possible to establish how widespread some practices are. More quantitative approaches will require additional data gathering exercises. Alternatively, reporting style and the structure of ENQA's agency review reports may be adapted to gather specific information as part of the review process.

REFERENCES

Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). 2015. Brussels, Belgium

ENQA reports accessed on ENQA's website – Review reports and decisions. Online at:
https://enqa.eu/index.php/reviews/review-reports-and-decisions/

APPENDIX 1 LIST OF AGENCIES INCLUDED IN THE REVIEW

Country	Agency Acronym	AGENCY
Armenia	ANQA	The National Centre for Professional Education Quality Assurance Foundation
Belgium	AEQES	Agency for Quality Assurance in Higher Education
Bosnia and Herzegovina	HEA	Agency for Development of Higher Education and Quality Assurance of Bosnia and Herzegovina
Bosnia and Herzegovina	RS HEAA	Higher Education Accreditation Agency of Republika Srpska
Bulgaria	NEAA	National Evaluation and Accreditation Agency
Croatia	ASHE	Agency for Science and Higher Education
Denmark	AI	Danish Accreditation Institution
Estonia	EKKA	Estonian Quality Agency for Higher and Vocational Education
Finland	FINEEC	Finnish Education Evaluation Centre
France	HCERES	High Council for the Evaluation of Research and Higher Education (HCERES)
Hungary	HAC	Hungarian Accreditation Committee
Kazakhstan	IQAA	Independent Kazakh Quality Assurance Agency for Education
Kazakhstan	IAAR	Independent Agency for Accreditation and Rating
Latvia	AIC	Academic Information Centre
Lithuania	SKVC	Centre for Quality Assessment in Higher Education
Netherlands	NQA	Netherlands Quality Assurance
Netherlands	QANU	Quality Assurance Netherlands Universities
Netherlands and Flanders	NVAO	Accreditation Organisation of the Netherlands and Flanders
Poland	PKA	Polish Accreditation Committee
Romania	ARACIS	Romanian Agency for Quality Assurance
Russia	NAA	National Accreditation Agency of the Russian Federation
Serbia	CAQA	Commission for accreditation and qualit y assurance
Spain	ANECA	National Agency for Quality Assessment and Accreditation of Spain
Spain (Aragon)	ACPUA	Aragon Agency for Quality Assessment and Accreditation
Spain (Catalunya)	AQU	Catalan University Quality Assurance Agency
Switzerland	AAQ	Swiss Agency of Accreditation and Quality Assurance
United Kingdom	QAA	Quality Assurance Agency

APPENDIX 2 AGENCY COMPLIANCE LEVEL FOR STANDARDS (2.1, 3.4, 3.6)

	Standard		
	2.1	3.4	3.6
NEAA	1	1	1
PKA	3	2	2
AIC	2	2	1
HAC	1	2	2
ARACIS	2	1	2
QAA	1	1	1
NQA	2	3	2
CAQA	2	2	3
NVAO	1	2	2
ANQA	1	2	1
AEQES	1	1	1
IQAA	2	3	2
HCERES	2	2	2
ASHE	2	1	1
FINEEC	2	3	1
IAAR	2	2	2
QANU	2	3	2
AI	2	1	2
ACPUA	2	2	2
AAQ	not included	2	2
EKKA	2	2	1
ANECA	1	2	1
RS HEAA	2	4	3
HEA	2	1	2
SKVC	1	2	1
AQU	2	2	1
(1) Fully compliant	8	7	11
(2) Substantially compliant	16	14	13
(2) Partially	1	4	2
(4) Not compliant	0	1	0

APPENDIX 3 ESG 3.4, 3.6 AND 2.1 - DESCRIPTORS

Thematic analysis (ESG 3.4)
"Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities."

Guidelines
In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

Internal quality assurance and professional conduct (ESG 3.6)
"Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities."

Guidelines
Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are on-going so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy

- *ensures that all persons involved in its activities are competent and act professionally and ethically;*
- *includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;*
- *guards against intolerance of any kind or discrimination;*
- *outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;*
- *ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;*
- *allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.*

Consideration of internal quality assurance (ESG 2.1)
"External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG."

Guidelines
Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.