



British Accreditation Council

ENQA Review Follow-up Report

March 2017

Introduction

The British Accreditation Council for Independent Further and Higher Education (BAC) completed the ENQA membership process in January 2015. Full membership was awarded by the ENQA Board in March 2015. Since that date, the organisation has worked to develop its functions, policies and procedures, in the light of the recommendations contained in ENQA's report, through the implementation of an action plan.

BAC has welcomed the opportunity to review its activities and work has been completed, across the organisation, to meet ENQA recommendations.

BAC appointed a new Chief Executive Officer (CEO) in 2015, followed by the appointment of a new Chief Inspector (CI) and new position of Deputy Chief Executive Officer (DCEO) in 2016, who now form the BAC Senior Management Team (SMT).

BAC's Strategic Plan was approved by the Board in July 2015. The plan provides organisational objectives for the development of activities which will enable BAC to determine its operational direction and thereby achieve its vision.

Response to ENQA recommendations

ESG 2.2 Development of External Quality Assurance Processes

Standard:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures used

Panel Recommendation:

BAC to change the way of updating its procedures and standards so that it better includes wider variety of key stakeholders

On March 27 2017 BAC will launch a Higher Education Focus Group (HEFG) comprised of its stakeholders, including international, student and institutional representation. The remit of the group is to ensure that BAC's standards remain relevant and appropriate for quality assurance purposes in the United Kingdom (UK) and internationally.

The HEFG will be the stakeholder group that works with BAC in reviewing the Independent Higher Education Accreditation Scheme which will be completed in 2017. Consultation with these stakeholders will enable effective testing of the scheme and will address fitness for purpose with a relevant audience. The group will help to shape further the Higher Education Accreditation Scheme and will ensure that all stakeholder views will be taken into account in the development process.

As part of its internal quality assurance systems, BAC is reviewing the Higher Education Scheme with a view to ensuring the following:

- a) The scheme continues to represent best practice in international higher education quality assurance
- b) The scheme represents the interests of a range of stakeholders in higher education
- c) The standards and criteria are clear and appropriate
- d) The scheme supports BAC's quality assurance processes in the independent and public sector higher education institutions both in the UK and internationally.

ESG 2.4 Processes fit for purpose

Standard:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Panel recommendation:

BAC to consider how to include students and international experts in a meaningful and impactful way to provide benefit for its strategy, procedures, and standards regarding the HE component of its work. In addition, the panel recommends that inspection visits for full accreditation are not done with just one inspector (see also ESG 3.7 below)

BAC now has six student inspectors. They come from different types of academic institutions, both privately and publicly owned. They are studying various academic disciplines, from law to digital film making and two of them have an international background studying in the UK. The first two students were recruited in 2015 and recruitment has been on-going since July 2016, as a result of which four more have been recruited.

The student inspectors are deployed on all new and re-accreditation inspections under BAC's Independent Higher Education scheme, both in the United Kingdom and internationally. Their specific duties, on the inspection, are allocated to them by the Lead Inspector. A typical standard area, in which a student inspector will be involved from the outset, relates to student recruitment, support, guidance and progression, where their current experience as a student brings very valuable insight.

Student inspectors are supported by the rest of the team, as appropriate, during the inspection, especially on their first inspections. They are treated, throughout, as an integral and equal member of the team.

Student representatives are also members of BAC's Accreditation Committee (AC) meetings, during which reports, resulting from accreditation inspections, are reviewed and decisions on accreditation taken. Student representatives can vote on decisions in the same way as all other members of the AC. Student Inspectors, who have been part of an institution inspection team, cannot participate in accreditation and voting activities that relate to the same institution under review by the AC.

The Executive Committee (EC) now includes provision for a permanent place for an international representative. An international trustee has been in situ since October 2016. A decision has been made by the trustees that one trustee must be a student.

Recruitment procedures have been developed for all BAC's committees and groups. Students are asked to complete an application form and submit their curriculum vitae (CV). These are reviewed against a series of criteria, which include experience, knowledge and skills requirements.

Appropriate candidates are invited to a preliminary interview and, following successful performance in the interview, are invited to an induction/training day. The purpose of this day is to brief the students about the background to BAC and its role as well as the nature of the work they will be undertaking as a student inspector or representative. It also includes a short key skills test in questioning and listening skills to supplement the interview and an opportunity to meet an existing student representative and ask any questions they may have about the role. Following a final interview and, subject to satisfactory references, successful candidates sign a contract, confidentiality agreement, annual declaration and code of conduct.

ESG 2.5 Reporting

Standard:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Panel recommendation:

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

Report writing guidelines, which are published on the BAC's website, have been produced to standardise the content and improve the clarity and quality of reports. These guidelines set out a general best practice approach to writing the reports in terms of style, as well as what should be included in each section of the report. They have been discussed and agreed with the inspectorate at the inspectors' annual training event and have been in use since November 2016.

In addition, a set of exemplar reports has been sent to the inspectors to provide examples of good practice. The quality of reports is monitored to establish what additional support, guidance and training may be required. It is anticipated that additional training will be provided in 2017 for any inspector whose reports may not be meeting requirements consistently.

To assist with the editing of reports, an editors' checklist has been developed, which maps to the report writing guidelines. These will be used by BAC's internal editors as they are editing reports and will ensure that nothing is missed and that reports are referred to the inspector, when required.

The reports provide detail on the background and current provision of the organisation that has been inspected, as well as information, with an associated commentary, about how they meet, partially meet, or do not meet the BAC's standards. Where organisations do not meet the standards, action points are set out, which the organisation must meet to gain or maintain accreditation. The reports are structured so that the organisation's strengths and areas to improve are easy for a reader to find and to ensure that they are useful for potential students, their parents and the general public.

In addition to publishing reports detailing positive decisions, BAC publishes deferred accreditation reports, pending the supply of additional evidence or another inspection.

ESG 2.8 System-wide analysis

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations assessments etc.

Panel recommendation:

BAC to consider how it can contribute to the knowledge base about the independent FE and HE sector in the UK drawing on its rich data and information.

BAC produced its first Annual Statistical Report in 2016. The report included statistical data as well as a section examining the impact of BAC's activities on institutional quality assurance. The report was widely distributed to other agencies in the UK, education institutions and is publicly available on the BAC website.

The 2017 Statistical report is due to be completed by the end of March 2017.

The statistical feedback is analysed internally and feeds into BAC's internal review process.

BAC has begun to engage actively in the wider education community by making presentations at several education events. The sharing of good practice and the promotion of quality assurance through attendance at external events and its impact on students is a key objective for BAC and we expect BAC activity in this area in 2017 to be significantly greater than in 2016.

A short survey sent to 29 BAC-accredited higher education institutions has provided insight from an institutional perspective. This has resulted in qualitative feedback regarding the inclusion of students in the inspection process. Interviews with students relating to their experience as inspectors and committee members are currently in progress to further understand and shape BAC interaction with students and create an additional platform for the student voice.

The HEFG will provide further opportunities for wider engagement. It will serve, in an advisory role, to provide feedback, relating to Higher Education, on the updated Independent Higher Education Scheme standards, ensuring they remain relevant and fit for purpose. The group's remit is to ensure that BAC's standards are appropriate for higher education Institutions, and can be used by third parties during due diligence enquiries.

ESG 3.4 Resources

Standard:

Agencies should have adequate and proportional resources, both human and financial to enable them to organise and run their external quality assurance processes in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Panel recommendation:

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

In July 2015, BAC adopted a three-year Strategic Plan which set out the development of BAC for the period 2015-2018. The Strategic Plan set key objectives for the organisation.

Implementation of the Strategic Plan is being supported by an expanded BAC staffing structure. The key changes to the structure include the following:

- a) The development of a Senior Management Team consisting of the Chief Executive officer, Deputy Chief Executive Officer and Chief Inspector
- b) The adoption of Standard Operating Procedures (SOPs), which set out the internal operating procedures and which themselves are aligned to ESG 2015.

Further recruitment includes:

- 1) The appointment of a full time and permanent Accreditation and Quality Enhancement Manager. The post holder is responsible for overseeing all inspection and accreditation planning and delivery activities
- 2) The appointment of a full time Chief Inspector. Previously a part-time position, the Chief Inspector is responsible for overseeing the work of the inspectorate, ensuring the maintenance of inspection standards, ensuring that all BAC schemes are updated, leading inspector focus groups and is a member of the BAC Senior Management Team.
- 3) The appointment of a Higher Education Manager - the Higher Education Manager's key role is to liaise with the higher education sector in general, to liaise specifically with BAC-accredited higher education institutions and those seeking accreditation, to lead

discussions on developments in BAC's higher education sphere and to keep BAC staff fully informed of developments within the higher education sector.

- 4) The appointment of a Deputy Chief Executive Officer – the Deputy CEO's main role is the day to day running of the organisation, staff training and management of staff.

ESG 3.7

Standard:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available.

Panel recommendation:

BAC to address the external quality assurance approach to use only 1 or 2 inspectors and limited inclusion of other experts including international experts, students or other stakeholders or representatives.

BAC deploys an experienced inspector team for higher education inspections made up of, as a minimum, a lead inspector, a team inspector and a student inspector for its full new and re-accreditation inspections. A student inspector, two of whom have international backgrounds studying in the UK, is included in the team.

The Chief Inspector regularly monitors inspection visits, in order to observe the inspectors' performance when conducting inspections and to ensure continuous improvement.

BAC gathers feedback on the approach, content and organisation of inspections from institutions and inspectors after every inspection.

The inspectors' handbook is under review, by a working committee, to ensure consistency in the preparation and conduct of inspections and to share good practice amongst the inspectorate.

ESG 3.8

Standard:

Agencies should have in place procedures for their own accountability

Panel recommendation:

BAC to develop a coherent policy on its own quality and apply it systematically

BAC has conducted a full review of its governance structure using an external consultant. The external review led the development of an internal review body made up of trustees and Council members.

The internal review body concluded that the existing governance structure could be improved to improve transparency and accountability.

On 9 February 2017, the trustees agreed a new governance structure consisting of the following committees:

- a) The Council – consisting solely of trustees. The Council will include, and this has been set out in the charity Articles, an international trustee and a student trustee
- b) An Accreditation Committee – the Accreditation Committee has delegated authority from the trustees to approve or decline accreditation for existing or applicant institutions. The Chair of the Accreditation Committee will be a trustee and will have the right to observe any of the other committees

- c) An Audit Committee - the Audit Committee is charged to ensure that the organisation maintains statutory compliance, membership compliance (primarily ENQA and EQAR) and conducts its business in an efficient manner
- d) Standing Committee – the committee’s main purpose is to facilitate decision-making between Council meetings.

Conclusion

BAC will continue to develop its activities and processes in response to the Strategic Plan and the ENQA recommendations. In a commitment to ongoing quality improvement, further work to align the organisation’s operational procedures with the ESG 2015 is underway and the development of an overarching quality policy is under review.

March 2017