

British Accreditation Council

Self-Assessment Report for Renewal of ENQA Membership and EQAR Registration

July 2024

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Part I – Background

1. Introduction

The British Accreditation Council for Independent Further and Higher Education (BAC) completed the European Association for Quality Assurance in Higher Education (ENQA) membership process in January 2015, with full ENQA membership awarded in March 2015. Following a second review in September 2019, full membership was reconfirmed by ENQA board in February 2020.

BAC is now applying for the third cycle of ENQA membership using the targeted review method and will use the outcome of this review for reconfirming European Quality Assurance Register for Higher Education (EQAR) registration. BAC's membership of ENQA and EQAR registration contributes to strategic direction-setting and guides work across all of BAC's work, as shall be demonstrated across the sections of this self-assessment report (SAR).

The SAR outlines how BAC has continued to meet and enhance ESG 2.1 and 3.5 and how it has responded to the recommendations from the previous ENQA review in meeting ESG 2.6 and 3.4. In addition, the SAR includes information on ESG 2.2, 2.5, 3.1 and 3.3 which have been added to the Review Terms of Reference agreed between BAC, ENQA and EQAR, following substantive changes reports discussed at the EQAR Committee in July 2024.

As detailed in the terms of reference agreed by ENQA and EQAR and published on the BAC website, the Independent Higher Education (IHE) Scheme's (evidence 01) accreditation of higher education institutions forms the basis of this review. This is the BAC scheme that is used when inspections of higher education institutions are made on a basis of holistically reviewing a Higher Education Institution encompassing governance, management, facilities and the teaching and learning experience of students. The BAC IHE Scheme has been operational since 2015 and has seen some level of revision in 2023, especially in relation to necessary upgrades and for further alignment with other schemes. The key outcomes from revising the scheme were to avoid repetition, ensure the scheme was still fit for purpose, up to date, continues to serve the needs of BAC providers and demonstrates that it responded to the recommendations given by ENQA in the previous full review relating to the inspection of internal quality assurance arrangements at providers being accredited under the IHE Scheme. The eligibility criteria, methodology applied, quality standards and processes underpinning decision-making have remained the same since the previous ENQA review and none of the procedural elements have been subject to significant changes. BAC has taken deliberate steps to ensure that any changes in the standards continue to cover all aspects of the ESG in practice, are fit for purpose to achieve the aims and objectives set for it and are consistently implemented. The mapping of IHE to ESG 2015 in Annex 1 shows full consideration of ESG 2015 in the design and development of the IHE and any more recent revisions of the IHE have not altered the nature and degree of this mapping, as also applicable during the previous full review. For the future, BAC will make provision to do a full review of the IHE scheme when the ESG is updated in 2026/27. More detail is provided in the sections ESG 2.1, 2.2 and 2.5 below.

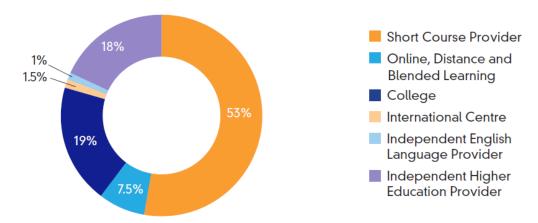
BAC uses five other schemes that also take full account of the expectations outlined in the European Standards and Guidelines (ESG) 2015 but are not in the scope of this review, as these do not cover higher education provision. Any reference to these other schemes as part of this SAR is limited and applicable only to the demonstration of BAC global operations.

Context of the organisation

BAC was established in 1984 by the Department for Education and British Council to provide comprehensive quality assurance for independent further and higher education in the UK. BAC is registered as a UK charity; therefore, all BAC activities are directed to fulfilling its charitable objects of working for the public benefit (evidence 02). BAC is not part of the UK higher education regulatory regime; therefore, all providers that engage with BAC do so voluntarily. This is considered by BAC to be advantageous because standards and decision-making criteria remain independent from political influence. BAC promotes strong and transparent governance structures, with sufficient flexibility, to safeguard this independence which is important with respect to ESG 3.3.

BAC just celebrated 40 years (evidence 03) of continual development, structural adaptations and global successes at this year's Annual Stakeholder Event. Over this time, BAC has used its independence from the UK government to embed its charitable objectives and be able to demonstrate its values of ethical principles. BAC has a strong commitment to quality assurance and is in a good position to continue to make an impactful contribution to the educational sector for many years to come. This is driven by its mission, vision and strategic objectives and is underpinned by its consistent commitment to operational and resource-based investment.

BAC has a unique institutional portfolio that brings together a community of higher education, further education and training institutions from around the world. BAC operates six distinct schemes (Short Course Provider Scheme, Online, Distance and Blended Learning Scheme, College Scheme, International Centre Scheme, Independent English Language Provider Scheme and Independent Higher Education Provider Scheme) which cater for the needs of different provider types. At the time of writing (July 2024), BAC had 199 accredited institutions, of which 20% were accredited through the IHE Scheme, which equates to 40 providers – 11 from the UK and 29 international, out of which 17 are from the European Higher Education Area (EHEA). These numbers do fluctuate throughout the year following an Accreditation Committee meeting and may differ from the numbers in the annual report summary as those reflect the previous year's activity up to the 31 August. Figure 1 below demonstrates the proportion of providers accredited by BAC's different accreditation schemes in the 2022-2023 period.



Accredited providers per scheme

Figure 1. Accredited providers per scheme (from the Annual Report Summary 2022–2023)

Institutions under the IHE scheme (purple in the diagram above) are all higher education institutions offering full degree programmes. Each of these institutions/organisations has been assessed against a series of respected and internationally aligned quality assurance standards. The standards are applied specifically to the type of organisation via the most appropriate accreditation scheme for which the institution demonstrates eligibility. The six specialised schemes are documented in handbooks that recognise the diverse and distinctive nature of our accredited organisations. Since the last ENQA review, BAC has developed a <u>Common Quality Framework</u> (evidence 04) applicable across all BAC schemes and institutions, representing the quality commitments that all BAC-accredited institutions demonstrate and maintain during the accreditation cycle.

BAC ensures that stakeholders are kept informed of BAC activities and one of the methods of doing so is to produce an annual report summary, which is a record of the activities that took place in the previous year. The report was launched at the annual stakeholder event in April 2024, circulated to all stakeholders and uploaded to the BAC website.

BAC continues to focus on maintaining governance activity, which is appropriately streamlined, and on developing its operations via effective strategic planning and rigorous monitoring of BAC resources. Investment in staff members in terms of well-being and training is considered paramount and finances are managed transparently and ethically as is fit for any organisation, especially a charitable one.

BAC governance

BAC is governed by the Council, which consists of 12 trustees who hold ultimate responsibility for BAC's strategic direction. Specific committees have been set up (Figure 2) and have delegated responsibility for BAC operations, namely the Audit Committee, Standing Committee and Accreditation Committee, all of which report to the Council (evidence 05). The length of tenure for Council members is reviewed annually (evidence 06).

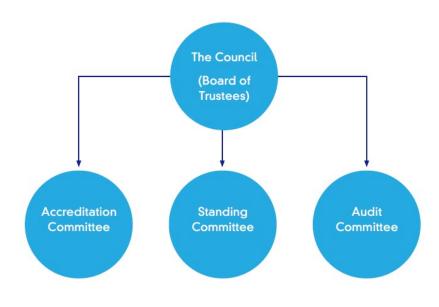


Figure 2. BAC Committee structure

The Standing Committee meets between Council meetings to provide continuity and support for BAC's work. This committee's members are the Chair of the Council, Deputy Chair of the Council and Honorary Treasurer. The duties of nominations and governance are discharged by the Standing Committee.

The Audit Committee provides financial and regulatory oversight. It is composed of four Council members, including the student member. An independent financial expert, non-Council member, joined the committee in May 2024 to offer objective advice in relation to matters of transparency and ethics for financial decisions. The committee meets three times a year at least one week before the Council meets.

The Accreditation Committee has responsibility for decisions on individual accreditations. This committee is appointed by the Council and consists of members appointed by virtue of their experience and expertise in educational standards. Four members of the Accreditation Committee are international members, and one is a student member. The committee receives reports of completed inspections and makes the final decisions on the award or withdrawal of BAC accreditation. It is also responsible for reviewing the quality assurance standards used by inspectors in making judgements and recommendations. The Accreditation Committee has up to nine online meetings a year. The <u>dates are published</u> on the BAC website, which has allowed those being inspected to see when decisions will be made.

Areas to note:

- BAC has a new Chair of the Council, <u>Prof Phil Cardew</u> (appointed 1 September 2022) and has international members and student representatives in both the Council and Accreditation Committee.
- BAC has a new Chief Executive, <u>Dr Janet Bohrer</u>, and a new position of Governance and Business Development Manager was instituted and later transformed into the Deputy Chief Executive role to substantially increase oversight of BAC processes and good governance. Further information is detailed in 3.5.
- The terms of reference (ToRs) for each of the committees have been reviewed for their continued fitness for purpose. Each of the ToR documents is publicly available and has been awarded a Crystal Mark by the Plain English Campaign. Further information is detailed in ESG 3.1.
- Improvements have been made to the structure, content, type and dissemination of papers submitted to the Council and committees. The use of standard templates and carefully chosen standing items in agendas allow BAC to better track matters arising and provide a clear audit trail of the activities undertaken.

The overall impact of these improvements is that the Council and committees have more informed and in-depth discussions to ensure a culture of critical evaluation of options and opportunities for enhancement, which in turn leads to more effective decision-making. However, it is important to note that whereas these improvements ensure smoother operational procedures, they do not change the stakeholders' involvement in the agency's governance as compared to the last review. The roles and responsibilities of stakeholders facilitate good governance along the same principles as witnessed by the previous ENQA review panel. Equally, these changes do not affect the degree or nature of the agency's independence and autonomy. BAC continues to be non-regulatory, with all directions for accreditation being independently governed and autonomously implemented. This proves beneficial to providers as BAC has the capacity to follow international trends more agilely and this gives providers the opportunity for better international and global alignment, keeping them constantly connected to developments within global educational sectors.

2. Development of the self-assessment report

BAC reviewed the recommendations and feedback in the 2020 ENQA report and has incorporated them to enhance its quality assurance processes and services. Matters associated with the ENQA recommendations have had regular inclusion in the Council and Audit Committee agendas. In 2022, BAC submitted a follow-up report to ENQA which provided a detailed update on the response and progress made since the full review in 2020, including all action taken, at both strategic and operational levels, so as to address recommendations and suggestions received.

In preparation for the 2024 ENQA review, BAC appointed an internal lead, the Higher Education Manager, to construct, edit and shape the SAR. The Higher Education Manager worked with an internal working group consisting of the CEO, Deputy CEO and BAC Senior Advisor (External), who has experience with the European higher education and quality assurance landscape, to produce the SAR.

Regular items were added to every Standing Committee meeting agenda, and three information working papers detailing the timeline and processes for producing the SAR were developed and circulated to all staff and Council members. At the same time, a formal application for a targeted review was made to ENQA. This established which SAR sections were allocated for contributions from multiple staff members with responsibility for those areas, and timelines were established to give sufficient time for review and discussion among colleagues, so as to ensure that the SAR could be a collectively owned document.

This submission is the coordinated output of multiple BAC staff contributions.

To ensure that stakeholder feedback was considered, BAC held workshops with the Accreditation Committee members and inspectors facilitated by an external consultant. At the Annual Stakeholder Event, a session was held for accredited providers, inspectors, committee members and trustees to seek their feedback and thoughts on how BAC had incorporated the recommendations from ENQA (evidence 07).

The SAR was reviewed by the Council members, who contributed further expertise on various drafts and this final submission. The SAR was formally approved for the Council by the Standing Committee and submitted to the full Council at its June 2024 meeting.

Following the submission of the SAR to ENQA, discussions during the internal ENQA review process took place between ENQA and BAC and thereafter with EQAR. As a result, BAC was asked by the EQAR Register Committee to include additional information on some ESGs which had not previously been part of the initially agreed ToR between BAC, ENQA and EQAR, and, hence, had not formed explicit part of the SAR preparations, although reference had been made to these in the overarching sections. This new detailed information has now been included in this updated version of the SAR to directly respond to EQAR requirement and is targeted to provide the EQAR Register Committee with the specific information requested rather than to offer a full and comprehensive evaluation of the

whole ESG which had previously been assessed as fully compliant or substantially compliant under the ENQA 2020 review. These ESG are: 2.1, 2.2, 2.5, 3.1, 3.3. Further information on what was specifically asked by EQAR is included in each of the SAR chapters.

Overall, the process of writing the SAR has been a positive one. It has allowed BAC to consider the activities undertaken since the last review and the actions taken to embed the recommendations made by ENQA into various aspects of the organisation. Working collaboratively with staff members, seeking feedback and input from trustees and stakeholders, and benefiting from the expertise of external experts has resulted in an evaluative document for the targeted review process.

3. Developments since the last full review

Since the last ENQA review, a new Chief Executive and a new Chair of the Council have been appointed. These new appointments shifted the ethos of BAC towards embedding greater importance of a quality culture within the organisation. The BAC stakeholder event (evidence 07) was first held in February 2020 and then annually thereafter. The event gathered providers, inspectors and other stakeholders and was an opportunity to discuss strategic developments and build on the BAC community of practice. Following these discussions, the BAC strategy for 2021–2026 was launched at the Annual Stakeholder Event in 2021. It is summarised below. (Figure 3)

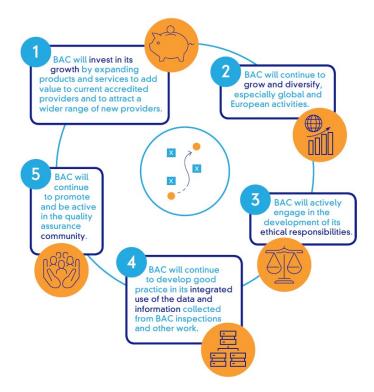


Figure 3. Summary of the BAC Strategy 2021-2026

The BAC Strategy 2021–2026 outlines an ambitious vision for the future and announces a shift towards more enhancement-led approaches and stronger ethical awareness for the BAC stakeholder community (evidence 08).

In summary:

- BAC will **invest in growth** by expanding products and services to add value to current accredited providers and to attract a wider range of new providers.
- BAC will continue to promote and be active in the quality assurance **Community**
- BAC will continue to **Grow and Diversify** especially Global and European activities.
- BAC will actively engage in the development of its **Ethical responsibilities**.
- BAC will continue to develop good practice in its use of **integrated use of the data and information** collected from BAC inspections and other work.

The implementation of this plan is monitored by the Council and reported on in the annual report prepared for the financial audit that BAC undergoes each year (evidence 09).

The highlights of our successes in meeting our strategic plans include:

- **Development workshops with providers:** The development workshop series was launched as a strategic move towards strengthening the BAC community and providing opportunities for practice sharing and quality debates to support providers in their future ambitions and imminent challenges. Timely topics identified by BAC and invited speakers have stimulated quality actions and institutional drivers.
- **Thematic exploration:** Thematic debates have been hosted as part of focus groups with inspectors and providers to identify areas in need of improvement and areas of strength and good practice. The conclusions from these analyses have been used in a multilayered approach towards the development of the Strategy, the Common Quality Framework and scheme operational applications.
- International growth: BAC's plans for international growth are materialising with planned targets at the system level in addition to intensifying accreditation activities for international providers. A system-wide accreditation project was completed in Bahrain with the Higher Education Council, and discussions at the governmental level are taking place in Vietnam and Egypt and are being extended to Nepal and Qatar.
- Common Quality Framework: An overarching standards framework was developed with substantial stakeholder involvement and thematic analyses of provider performance. Introduced in 2022, the Framework allows for a unified articulation of quality principles that can be used across all inspection schemes while retaining the variety of schemes applied to a diverse provider base. When each scheme is reviewed, typically on a 4-5 yearly cycle they are also assessed to ensure that they align with the Common Quality Framework.
- Accreditation process and inspection developments: Fully online inspection processes were developed in March 2020 and implemented in July 2020 to address the restrictions of the pandemic and ensure the continuation and robustness of BAC activities. As a result of carrying out inspections online, BAC further developed a comprehensive set of written and online interactive guidelines for running inspections online, as well as on a hybrid basis (with a mix of online and onsite inspection activities) (evidence 10 and 11). Following positive feedback from the inspected providers and inspectors, BAC has considered the benefits of the process and analysed lessons learned to identify what it should retain for the future.

An extract of the paper outlining this to the Council is set out below:

Benefits of online inspection activities	Benefits of onsite inspection activities
 There is less observer effect when visiting lessons, as the inspection is less intrusive than sitting in a room and taking up a desk, possibly disturbing the lesson flow. The electronic submission of documentation may be easier for providers, although the inspector can still ask for these electronically. Online activities have a positive impact on the environment and reduce BAC's carbon footprint. Monitoring the inspection is easier as it can be in the background with the camera off and be less intrusive. 	 facilities and how they are used, is easier. Face-to-face classes, especially practical and active classes, can be better observed, and the inspector can talk to the participants/students. Building effective relationships and communicating is easier in face-to-face meetings.

The conclusion from the above information is that it would make good sense, where possible, to use a hybrid mix of online and onsite inspection activities according to a set of clear criteria (evidence 12).

Hybrid inspections were developed and launched in November 2021 as a strategic, risk -based approach for the future. All full inspections and interim/probation inspections, including for institutions on the IHE Scheme, are subject to risk analysis. Decisions are taken as to whether they will be organised fully onsite, hybrid or fully online, with benefits and likely challenges considered in detail before the inspection arrangements are confirmed. Each provider is assessed on a case-by-case basis to decide on the best type of inspection to carry out by using the criteria developed (evidence 12). These include the provider's previous history with BAC and any risks that have been identified as a result, the complexity of the administration or teaching locations that need to be inspected, the practical or theoretical nature of the teaching that is offered and whether it is predominantly offered onsite or online. The pandemic has activated the online/hybrid modes of inspection and BAC has since developed and approved procedures underpinning their effective implementation. Although hybrid and fully online inspections were procedurally an option before the pandemic, online elements were developed further and have shown their benefits, are proving viable and have entered mainstream BAC practices.

BAC also started a review of the accreditation processes in 2022–2023. One outcome was the streamlining of the re-accreditation application process. This means we have reduced the number of supporting documents that institutions are required to submit at the application stage before they are signed off for inspection planning. The inspector will then follow up with the provider, during the inspection, on such documents which are important for the review process. The revised procedure reduces the burden on the provider in the application stage but retains the robustness of the overall process.

Finally, BAC conducted a review of some of its schemes and, for consistency, appropriate revisions were then carried across all other schemes, including the IHE, as is explained in 2.1.

- Research and quality assurance community engagements: BAC has proactively identified areas of future interest and has led and contributed to the quality debate at the European level and internationally. These include:
 - The ENQA Working Group on Micro-credentials which BAC proposed to ENQA and for which it held the chair. The results of the working group were disseminated at an online event in September 2022, followed by a comprehensive publication in 2024.
 - Participation at international events, by invitation, to contribute to the quality debate and the solution being explored for the post-pandemic future. This included dialogue with a number of national governments for support and advice on the implementation of post-pandemic external quality assurance arrangements.

All these developments are enabling BAC to meet its strategic goals and consider future steps under its declared operational objectives.

Part II – Focus areas

BAC has included the following ESGs in the SAR, where the organisation will be focusing on compliance:

ESG included for compliance purposes	Previous compliance status		
2.1 Consideration of Internal Quality Assurance	Substantially compliant		
2.6 Reporting	Substantially compliant (ENQA)		
	Partially compliant (EQAR)		
3.4 Thematic Analysis	Partially compliant		

BAC has included the following ESGs in the SAR, where the organisation will be focusing on enhancement:

ESG included for enhancement purposes	Previous compliance status		
3.5 Resources	Substantially compliant		

BAC has also included the following ESGs on request from the EQAR Register Committee following the submission of substantive changes reports to EQAR. The information provided is focused and is not designed to address the whole standard, but to ensure that the changes made by BAC remain compliant with the ESG:

ESG included for targeted analysis as instructed	Previous compliance status		
by the EQAR Register Committee			
2.2 Designing Methodologies Fit for Purpose	Fully compliant		
2.5 Criteria for Outcomes	Fully compliant		
3.1 Activities, Policy and Processes for Quality	Substantially compliant		
Assurance			
3.3 Independence	Fully compliant		

Compliance areas

ESG 2.1 Consideration of Internal Quality Assurance

includes also EQAR register committee request addressing specific targeted focus: Analyse whether the revised standards of Accreditation of Higher Education Institutions cover all aspects of ESG in practice.

SUMMARY: To ensure that the institution under inspection is demonstrating effective implementation of Part 1 of the ESG, BAC is first informed by the judgement of the inspector team. The Independent Higher Education (IHE) Scheme includes specific references to internal quality assurance with the majority of key indicators in the IHE Scheme requiring an assessment of an institution's policies, procedures and mechanisms relating to how it assures the quality of what it does. This encompasses enrolment, governance, student support and quality management, assurance and enhancement. BAC can monitor this through the inspection reports review process, the Chief Inspector's monitoring of inspections and the Accreditation Committee's report summary document discussion during its meetings. Overall, the internal quality assurance of institutions undergoing accreditation is of major importance for the inspection processes and will be reported on, including in relation to recognition arrangements.

In respect of the EQAR Committee targeted analysis request, BAC confirms that the more recent revisions made to the IHE Scheme are allowing inspections to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG, in response to the ENQA recommendation. Other revisions have not impacted on the breadth or depth of consideration of ESG coverage, as part of the accreditation process.

BAC's <u>Common Quality Framework</u> (evidence 04), which underpins BAC inspection schemes, embeds the notion of developing internal quality assurance as a continual journey of enhancement.

The IHE Scheme comprehensively assesses the effectiveness of internal quality assurance arrangements for higher education providers undergoing the accreditation process via the standards and key indicators BAC uses for inspections (evidence 01).

BAC has mapped Part 1 of the ESG (Annex 1) onto the minimum standards used to determine compliance under IHE and ensures that inspectors receive ample training to maintain a clear focus on effectiveness. The mapping explicitly demonstrates that IHE continues to cover all aspects of the ESGs in practice.

The IHE Scheme Document (evidence 01) details eligibility criteria, the accreditation cycle and summary information about the application and inspection processes. It is used by BAC to give providers an overview of the processes involved in accreditation and the standards against which their institution is inspected. It outlines minimum standards across seven inspection areas: 1. Governance, Strategy and Financial Management; 2. General and Academic Management and Administration; 3. Teaching, Learning and Assessment; 4. Student Support, Guidance and Progression; 5. Premises, Facilities, and Learning Resources; 6. Quality Management, Assurance and Enhancement; and 7. Online, Distance and Blended Learning (where applicable). Principles of robust

quality assurance permeate all seven areas, as reflected in the overarching statements of the Common Quality Framework.

The <u>Accreditation Handbook</u> sets out how BAC undertakes the accreditation activity in practice and clearly explains how the minimum standards are used across all stages of the process to ensure the alignment of perspectives of those involved. This includes the assessment of the self-evaluation document and evidence submitted by the provider, the visit by the inspector, the drafting of the inspection report and the focus of the Accreditation Committee in reaching its decision.

Institutions are made aware of the types of internal quality policies and reporting mechanisms they should have in place through a list of documentary evidence included in the scheme document and a document checklist sent to the institution by the lead inspector as part of the inspection preparation. This evidence is submitted to the lead inspector before the inspection and reviewed by the inspection team members as part of evidence gathering during the inspection.

BAC maintains consistency of the IHE application via training and guidance given to inspectors and providers (as discussed in 2.6) and the rigour of the report writing and editorial processes. A focus on the effectiveness of the institution's internal quality assurance is guaranteed via guidance outlined in email briefings sent to inspectors prior to the inspection having being introduced and reinforced at the inspectors' annual training events and the Chief Inspector's monitoring of inspections (evidence 13). The Record of Evidence (evidence 14) that inspectors complete also documents the attention afforded to internal quality assurance arrangements by the institution being reviewed. In addition, the Inspectors' Handbook is a guide on how to prepare and conduct inspections, make judgments and reporting on the inspection findings. This handbook (evidence 15) is currently being updated.

As part of internal quality assurance expectations for the providers being inspected, the IHE Scheme checks how recognition is dealt with and what arrangements are promoted for formal, informal or experiential prior learning in alignment with national higher education regulations. This is reported via the standards under IHE. BAC expects the institution to present a clear policy on the recognition and accreditation of prior learning and prior experiential learning and that this policy is brought to the attention of prospective students to ensure smoothness for the admission process. BAC understands that some national contexts beyond Europe may have strict regulations for recognition arrangements where formal recognition may be better represented than informal or experiential prior learning. The expertise of the inspectors is such that they understand the differing levels of tertiary education and how they interact so can make a judgement on the appropriateness of internal recognition arrangements which institutions have put in place, also by careful consideration of the specific national regulatory system, also where those specificities may differ to UK practices.

Recent revisions to IHE

The <u>IHE Scheme</u> has been part of the BAC suite since 2015 and some revisions were applied in 2023. These revisions were prompted by an intention to align with other BAC accreditation schemes outside of the scope of the ESG, which had undergone a full internal review and specific changes had been implemented. BAC appointed an experienced HE inspector to identify the quality standards of IHE which should be changed based on feedback from reviews or consultations on BAC's other accreditation schemes where comparative key indicators are present. In addition to this, informal feedback gathered from the conclusion of various IHE inspections was also considered by BAC head office staff, including the Chief Inspector, and a small number of inspectors. BAC published the revised scheme on the website on 1 September 2023. As a result of these revisions, the IHE scheme has been improved through the removal of duplication and is fit for purpose and reflects best practice.

For now, the 2023 revisions to the scheme cover:

- A shift in focus to assess the impact of how institutions can demonstrate their effectiveness against the key indicators, making it explicit that it is the institution's own internal quality assurance processes that are used by the inspection team to make their judgements – in direct response to the ENQA recommendation
- Reduction of prescriptive text in the key indicators
- Simplification of long and multifaceted key indicators to make them clearer
- Removal of repetition where possible
- Changes in terminology to ensure the scheme remains up to date, including the broadening of learning resources beyond a traditional library
- Addition of a key indicator to ensure accessibility of premises.

The IHE scheme will undergo a full review in 2027 when the ESGs are updated. The process will include a focus group and carefully consider if the IHE remains up to date with the developments in higher education and is aligned with the revised ESGs.

ESG 2.2 Designing Methodologies Fit for Purpose

EQAR register committee request addressing specific targeted focus: Address whether the updated standards of Accreditation of Higher Education Institutions are fit for purpose to achieve the aims and objectives set for it.

SUMMARY: The aim and objective of the IHE scheme is to give higher education institutions, delivering full degree programmes, the opportunity to seek an accreditation status by being inspected against robust, internationally-aligned standards. The process sees institutions having to meet eligibility criteria before undergoing the full inspection process which checks for compliance with IHE minimum standards and key indicators and results in a report. A decision on accreditation is made by the independent Accreditation Committee on if accreditation will be awarded.

The revisions of the BAC IHE scheme, as described in ESG 2.1, were revisions which did not change the aims and objectives of the scheme, but tested its continued fitness-for-purpose, in light of educational developments. The revised IHE scheme is deemed fit-for-purpose by BAC and its stakeholders and continues to serve the aim and objective as noted.

No change was made on the aims and objectives of BAC accreditation under IHE, with IHE remaining strongly anchored under the remit of BAC's mission to 'provide responses and rigorous inspection-based accreditation to enhance the stands and quality of independent FE, HE and training providers'.

As noted under 2.1 the 2023 revisions of the IHE scheme saw minor revisions to the standards for the IHE and their key indicators, with the effect of strengthening the inspection focus on assessing

the institution's own internal quality assurance processes and verifying the accessibility of premises. This process also looked at reducing prescriptive text and making formulations clearer, with simplified terminology, and removal of duplication, specifically addressing the needs of users of English as a second language. In consultation with internal stakeholders BAC was keen to keep these changes as minor with no impact on the aims and objectives of IHE and no change to the scheme's fitness-for-purpose.

When a full review of the scheme takes place in 2027, it will involve input from external stakeholders and ensure that the scheme is re-aligned with the new ESGs.

ESG 2.5 Criteria for Outcomes

EQAR register committee request addressing specific targeted focus: *Consider whether the revised standards of Accreditation of Higher Education Institutions are consistently implemented.*

SUMMARY: The revised standards of the IHE scheme, and therefore the inspection of higher education institutions, did not impact the process of how institutions were inspected. The IHE scheme standards are consistently applied for all inspections of higher education institutions, regardless of their location, size and individual circumstances. All institutions undergo an inspection by a team of inspectors, which includes a student inspector, and result in a report which details the judgements of the inspection team. The standards are consistently implemented through the training and guidance given to inspectors, as outlined in 2.6. Following the production of the inspection report a consistent process of report editing takes place. All reports are considered by the Accreditation Committee who makes the final judgement on if an institution is awarded accreditation.

There are no ramifications of the revised standards on the procedural delivery of IHE. IHE continues to be consistently implemented with robust outcomes on accreditation generated.

BAC ensures that the standards for the IHE scheme are consistently implemented through the training and guidance given to the inspectors. As discussed in 2.6 this consists of the Inspectors Handbook which outlines the approach that BAC takes towards inspections, training given to inspectors from induction and onboarding, webinars and annual inspectors training events.

Monitoring of inspections by the Chief Inspector both for new inspectors as well as experienced inspectors on a randomised basis is used to ensure a consistent and effective approach is taken during the inspection.

The Report Writing Guidelines ensure a consistency in BAC's inspection reports and the process of report editing with scrutiny by BAC staff as well as the experienced inspectors appointed as report editors allows BAC to be confident that a consistent approach is taken in how inspectors make judgments on if institutions are meeting standards.

The Accreditation Committee makes decisions on set criteria applied for all reports it considers and, in doing so, it ensures it issues consistent judgements.

The revisions to the IHE scheme have not had any impact on that process as a whole or any of its individual stages. These remain the same as what was in place prior to the revisions which were finalised on 1 September 2023.

ESG 2.6 Reporting

SUMMARY: Since the last ENQA review, a process has been ongoing to balance the need for a more evaluative approach and to ensure reports are not unduly discursive and descriptive. Following consultations with inspectors, the report template has been updated and more guidance has been issued to ensure more references are included in reports of the evidence consulted. The review is framed to increase the reports' analytical content. Feedback is provided to inspectors by the Accreditation team and Chief Inspector to further embed this revision in the report style. The updated report template also includes the inspectors' names at the end to increase transparency. BAC notes that these changes result in more detailed reports, allowing providers to be more targeted in their follow-up actions. At this stage there have been limited inspections undertaken using the updated guidance and report templates which have been through the accreditation committee and thereafter published on the BAC website.

All inspections for all BAC accreditation schemes result in a published report, IHE inclusive, which is available on the <u>BAC website</u> in the provider directory. Each accredited provider has their own page on the website and their reports are uploaded following the decision of the Accreditation Committee. As a matter of policy, this includes reports with negative outcomes. All inspection team members contribute their findings and judgements from the inspection to create the report, which is written by the lead inspector based on the evidence provided during the inspection process. All reports undergo a thorough editorial process, external proofreading and a factual accuracy check by the provider before they are submitted to the Accreditation Committee.

Reports give a fair and balanced description of the institution and its provision, are based on BAC's standards and procedures as set out in official documentation and provide clear judgements. Now, they also provide more references to the evidence on which the judgements have been made and its analysis (evidence 16).

The report templates are the same for all the accreditation schemes and consist of three parts:

- Part A: the introduction and background information about the institution and the key evidence-gathering methods used during the inspection.
- Part B: the judgement and evidence from the inspection team on how the institution meets BAC inspection standards.
- Part C: the summary of strengths, action points and recommendations for the institution. Each action point is given a priority level, from low to high, that must be addressed by the institution, either by the next inspection or by a deadline assigned by the Accreditation Committee. The recommendations relate to areas that the institution can improve further although their impact is not sufficiently severe to mean that a standard is not met. They will be reviewed at the next inspection.

The inspectors' names are added before publication but after the report has been submitted to the Accreditation Committee to maintain independent and impartial decision-making.

The templates include guidance for inspectors on report writing (evidence 17). This guidance is removed by the inspectors before they submit the reports to BAC. Inspectors are also asked to follow the guidance provided in the Report Writing Guidelines (evidence 18) prepared by the Chief Inspector, which are currently being reviewed.

The report sees inspectors assess whether minimum standards and key indicators are complied with. Inspectors are asked to provide evaluative and analytical comments to support the provider in understanding the judgements, mitigating any inherent risks and taking appropriate action for the future. The comments include impact statements, examples of good practice and any particular strengths of the institution, as well as areas to develop and improve, which lead to action points or recommendations. Reports increasingly include references to the evidence that has been reviewed as part of the inspection and its analysis (evidence 16).

BAC Inspectors are recruited through an open advert and job description on the BAC website. Following an interview, induction and onboarding process by the Chief Inspector, inspectors are trained to be able to conduct BAC inspections. Inspectors initially operate as members of a team and then progress to being a lead inspector and eventually a senior inspector. They are self-employed and may work for other organisations but BAC ensures that there are no conflicts of interest prior to the inspection taking place.

All inspectors undergo training in report writing and receive ongoing feedback on the quality of their reports through the report editorial process, which includes a final review by the Chief Inspector, as well as feedback from the Chief Inspector after an inspection has been monitored. Guidance given to inspectors through emails after the inspector training day in 2023 gave an overview of the content required for the report. This focused on the need to describe the evidence base that was used, for example relating to meetings, lesson observations, feedback forms, report templates, policies, procedures and systems. Inspectors also need to explain the detail of what that piece of evidence tells us about how the provider operates and, particularly in the case of policies and procedures, how the provider uses its internal quality assurance procedures to deliver a high-quality provision. Finally, it was highlighted that they need to make an overall judgment against the key indicator and provide an impact statement. Inspectors are then sent a reminder email of the requirements in advance of the inspection and receive feedback following a review of the report BAC staff and the report editor with any amendments required before the report is submitted to the Accreditation Committee.

In 2021, BAC held a focus group that looked into enhancement-led approaches and shared experiences of inspectors and other organisations developing standards and evidence-based report content. Following this, a workshop was held by the Chief Inspector as part of the inspectors' annual training event in 2022 (evidence 19), which included best practice for embedding evidence and evaluation statements into reports. This resulted in a stylistic change and improved the analysis contained in the reports, which is proving instrumental in guiding providers concerning their own quality assurance and enhancement practices.

Report editors are appointed by the Chief Inspector from the pool of inspectors. They receive guidance on the dos and don'ts of editing and framing their editing comments, feedback on their first edits from the Chief Inspector when they start working as an editor and ongoing guidance and feedback from the Chief Inspector as required. Editors are also informed of any changes made to the style and content of the inspection reports on an ongoing basis.

Once submitted to the Accreditation Committee, the reports are discussed in detail. The information included has been found to be sufficient to ensure robust accreditation decisions can be made. In addition to the reports, the Accreditation Committee receives the Report Summary Guide (evidence 20), prepared by BAC which includes previous report actions and recommendations and information about possible decision outcomes. This serves as a reference point for the committee's discussions and decisions.

Accompanying each report is a Data Collection Form giving details about the institution's location(s), scope of accreditation, courses and enrolments. For institutions on the IHE Scheme, the Data Collection Form also includes information about their degree-awarding powers, validation/franchise arrangements and teaching-out arrangements. This information is signed off by the lead inspector as part of the inspection. The information in the Data Collection Form helps the committee contextualise the reports and make informed decisions.

All institutions are expected to address any action points in the report by their next inspection. However, the Accreditation Committee can choose to award, continue or defer its decision on accreditation subject to the institution addressing specific action points sooner than the next inspection. Following a request from the Accreditation Committee, in January 2023, the Committee received guidance from BAC to codify the decision-making criteria used to determine the length of time it can give institutions to resolve action points. While these criteria provide a framework, the committee retains the flexibility to tailor its decisions to the specific circumstances of each provider and its respective reports (evidence 21). This flexibility allows the committee to consider such factors as the complexity of the issues, the institution's demonstrated commitment to improvement and any extenuating circumstances that may impact the timeline.

When an institution has been asked to submit evidence of addressing action points, the Accreditation Committee will be given an Evidence Review Report. The evidence submitted by the institution is reviewed by an inspector, and the Accreditation Committee reviews the judgements of the inspector as to whether the action point has been sufficiently met. Then the Accreditation Committee is required to make a decision on accreditation as a result and can do so confidently with the information provided.

Since 1 September 2023, whenever reports are published on the website, BAC has included on the report a note stating that the action points in the relevant report have been addressed following the decision of the committee to continue accreditation.

ESG 3.1 Activities, Policy and Processes for Quality Assurance

EQAR register committee request addressing specific targeted focus: Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee changed stakeholders' involvement in the agency's governance and work compared to the last review.

SUMMARY: BAC operates legally under the Articles of Association. The current version was adopted in 2018. BAC reviewed its Articles of Association using a lawyer to ensure they continued to be fit for purpose. During this process it was suggested that a review of all of BAC's Terms of Reference (ToR) would benefit from a refresh to make sure they were all consistent in format and in the information included. In 2021, further discussions with a lawyer, the Chairs of each of the committees as well as one independent trustee and Council member, the Terms of Reference for Council and committees were revised (evidence 05). Particular focus was given to ensuring consistency across the documents, improving the clarity of the language used, simplifying the documents where possible and removing or revising items that are out of date or no longer required. The revised ToRs were approved by Council on 16 June 2022. The ToRs are reviewed on an annual basis by each Committee and are presented to the Council at the first meeting of the year.

These updates are an important part of the BAC governance arrangements. BAC can confirm that the most recent revisions did not change the nature and degree of stakeholder involvement, but were operated to reflect more explicitly the work undertaken and to give the agency an opportunity to increase consistency in its procedural and presentational requirements.

It was timely for BAC to review its governance in 2021 given the challenges faced during the pandemic in the previous year. The purpose of the review was to identify any improvements that might have been required as a result of the challenging period as well as to make sure strengths already in place for BAC governance practice were fully embedded in all Committee ToRs.

The overall goal was to ensure BAC could continue to operate efficiently, for decisions to be made quickly and effectively, and resources to be used appropriately, all while maintaining accountability and transparency.

The Articles of Association, BAC's legal governing document, stood up to the challenge of the pandemic and no changes were required. The document was considered as being flexible and fit-for-purpose for the foreseeable future, with legal advice having been taken to ascertain this.

As part of the same process, it was determined that a refresh of the ToR for Council and the committees was required.

Below we summarise the revisions which were made to ToRs:

- Checks were performed to ensure consistency across the documents, aligning them, and standardising roles and processes, to improve coordination and collaboration across committees.
- Improvements to clarity of language were made to enhance stakeholders' understanding of their roles and help them navigate processes effectively. Clear language also enhances the inclusion of international stakeholders.

- Documents were simplified where feasible, and outdated or unnecessary items were removed or revised, for example, removing complex arrangements for chairing a meeting, in order to improve efficiency and allow members to focus on the priorities.
- Updates to procedures that reflected current practices, such as moving meetings online, which increased accessibility for stakeholders regardless of their geographical location, facilitating wider stakeholder participation in governance activities.

The documents were reviewed and approved by each committee before being formally accepted by the Council and <u>published on our website</u>. The annual review of these documents is now embedded within the governance framework.

By focusing on consistency, clarity, and simplicity, the changes make it easier for stakeholders to understand and engage with our governance processes. The removal of outdated items helps ensure the processes are efficient and effective. This therefore has had positive implications for stakeholder involvement.

The annual review process ensures ongoing responsiveness to stakeholders' needs, further supporting their involvement in BAC's governance and work.

Overall, BAC considers that whereas the nature and degree of stakeholder involvement has not been affected by the revisions operated, it confirms that there is already a noticeable increase in the quality of stakeholder involvement, with updates enhancing stakeholders' active participation and explicit influence, while promoting a consistent and better manageable format for their contributions.

ESG 3.3 Independence

EQAR register committee request addressing specific targeted focus: Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee affected agency's independence and autonomy compared to the last review.

SUMMARY: The updates to the ToRs for the Council, Standing Committee and Audit Committee (evidence 05) took place in 2021-22 and were approved by the Council on 16 June 2022. Each committee reviews their ToR at the start of the financial year and reports to Council. In May 2024 an external financial expert was appointed, as per BAC's governing articles, and as stated in the ToR.

BAC confirms that the review and subsequent revisions of the ToRs have not impacted the autonomy and independence of the agency. In fact, the addition of new members with diverse profiles enhances the agency's ability to be better anchored in international debates and to fully consider trends from other areas of expertise which can bring benefits to the higher education sector and, ultimately, BAC providers. As a non-regulatory body, BAC's independence is undisputable and its latest governance enhancements augment its autonomy, while solidifying BAC's strategic operations.

BAC's Articles of Association are the governing documents ensuring the agency's autonomy. There has been no change in the BAC Articles of Association since the last external review. The Articles were revised in 2018 and ensure that BAC maintains autonomy.

There have been more recent revisions to the ToRs conducted under the aim that they continue to align with the Articles of Association and do not impact the independence and autonomy of the agency.

BAC can confirm that these updates to the ToRs (as presented under 3.1) were tested for full alignment with BAC's Articles of Association. The revisions to the ToRs were not major and the process involved seeking the advice from a lawyer and trustees with expertise in governance. No changes were introduced that would compromise the agency's independence from third parties such as higher education institutions or governments. The agency's non-regulatory positioning and its charitable status also continue to be markers of its independence.

Council and Committees also saw the membership being enhanced. BAC procedures and the nomination and appointment of external experts are undertaken independently and are not informed by third parties such as higher education institutions, governments and other stakeholders.

Membership of Councils and Committees is reviewed annually to ensure a wide range of experience and that tenures are not too long, and since the last review, several strong candidates have been recruited as trustees or Accreditation Committee members (see also 3.5).

In May 2024 a financial expert was recruited to the Audit Committee. As per the item listed below, the Audit Committee can include a person with expertise that is not a member of Council.

'3.1 The committee will be chaired by the honorary treasurer (article 16.1) and will include at least two other trustees and the student member, appointed by the council. The committee may include at least one person with appropriate expertise who is not a council member (article 16.2). All members will have the right and duty to attend, speak and vote at any meeting of the committee.'

(cited from Audit Committee ToR)

The recruitment process consisted of an intensive search for someone that could contribute the necessary expertise over and beyond the expertise of our staff and Council members. The expert was interviewed by the chair and the CV reviewed by the rest of the Audit Committee and took up post this year at the last Audit Committee meeting. As part of his induction the new expert is meeting with members of BAC staff and has been invited as an observer to the next Council meeting in October 2024.

ESG 3.4 Thematic analysis

SUMMARY: Since the last ENQA review, BAC has systematically explored ways in which it can effectively use a thematic approach to develop its policies and processes and to support its provider community. BAC has demonstrated commitment to investing more time and effort into conducting thematic reviews and analysing common issues emerging from inspections, integrating them into a developmental item. BAC has strategically considered how it uses thematic components and has established the type of impact such thematic activities will need to generate to ensure full benefits for the agency's work and the accredited providers.

BAC published a thematic analysis for the Independent Higher Education (IHE) Scheme prior to the 2019 ENQA review, which was used to establish a baseline to extend discussions towards all categories of providers.

Following receipt of the previous ENQA report, BAC took the approach of holding focus groups to identify key issues and confirm them collectively with inspectors and providers, testing their applicability to other types of providers. The focus group discussions in 2021 used an independent moderator to encourage free discussion and proposed a strong analytical approach. BAC used this approach to understand the type of format a thematic review would need to take to ensure full benefits for the agency's work and the accredited providers rather than simply looking at the results of inspections and areas where providers had similar outcomes from inspections. Due to the dispersed nature of BAC providers, with very few clusters of institutions in any one country, as well as the variation in the types of providers, BAC decided not to repeat the same type of written thematic analysis report.

Integrating a higher level of stakeholder involvement allowed BAC to test the appropriateness of the aspects of the strategy, such as investing in activities focusing on quality enhancement and best practice. It has also given BAC a clear vision of what is important for inspectors and providers in analysing emerging themes and reflecting on how their identification can be maximised for strategic and operational action.

One of the themes that emerged from the focus groups was an interest in additional support from BAC to providers to enhance their quality assurance processes. As a result, BAC announced the launch of a liaison scheme at the Annual Stakeholder Event in April 2022. This has been paused until infrastructure changes are in place to support it with rich underpinning data and until a decision has been taken on the appropriate funding model and how to ensure no conflict of interest arises from an institution undergoing BAC accreditation that is also working with BAC to enhance its internal processes.

BAC is committed to using a thematic approach to developing inspection methodologies and enhancement workshops. This demonstrates that a more systematic approach to thematic reviews is identified in the BAC 2021–2026 Strategy (evidence 08, page 11) and that BAC is committed to investing more time and effort into making thematic reviews and analysing common issues emerging from inspections, integrating them into a developmental item in the future. BAC has strategically considered how it uses thematic components in its development work to establish the type of format a thematic review would need to take to ensure full benefits for the agency's work and the accredited providers. Consequently, we are swiftly moving towards confirming a multi-activity approach to thematic analysis – one that will enable us to delve into specific areas while also creating an overarching comprehensive impact for our operations. This means a mixed approach that includes analysis of reports and feedback from reviews, direct discussions as part of focus groups and other types of events so that the prioritisation of conclusions can result in effective resource management. Thus, we can guarantee that we invest time, effort and budgets in actions that will demonstrate the most impact for our stakeholders. As a fairly small team, BAC must remain responsive and agile. We can do this only if we approach thematic analysis from multiple angles and with multiple activities conducive to stakeholder engagement and considerate of their engagement preferences.

The Common Quality Framework is a direct result of this approach to thematic analysis. Through the activities we rolled out for thematic investigation, it became evident that overarching statements were needed to articulate the core principles any BAC provider can be seen to subscribe to, creating a unified profile for BAC-accredited providers irrespective of the scheme that they may have been inspected under.

In alignment with the Common Quality Framework, reviews of all schemes and inspection standards continue.

ESG 3.5 Resources

SUMMARY: Since the last ENQA review, investment has been ongoing towards capacity building, with all areas of governance and staffing benefitting from exposure to international expertise and professional development in relation to their specific roles. Additionally, BAC has made it a priority to make its working environment more agile and to focus on upgrading its resources. Systematic steps have been taken to enhance the area of resources to benefit all BAC activities.

To understand the developments of BAC since the last ENQA review, outlining the continuous and deliberate steps taken to improve the governance of the organisation is important. Strengthening BAC governance has made possible:

- 1) New appointments and positions to streamline BAC governance activity
- 2) Investment in BAC staff members in terms of well-being and training
- 3) Use of BAC finances in an even more transparent and more ethical way, ultimately benefiting providers with investments being strategically planned and rigorously monitored.

These developments encourage BAC to confidently choose ESG 3.5 as the enhancement standard detailed for this review, as we believe good practice can be promoted more widely towards ENQA members specifically and the quality assurance community more broadly.

Investment in people

BAC is proud to support an agile workforce with multiple flexible working arrangements for head office staff (Figure 4), appropriately aided by consultants and specialist advisers as required. This has been embedded since the last ENQA review and was a positive outcome that came about from responses to the challenges imposed by the global pandemic and the subsequent move to home/office hybrid working arrangements. This has made the BAC workforce extremely adaptable and effective. BAC used employment good practice principles to review the way it could work and made changes. The subsequent investment in staff and financial resources is an excellent example of BAC's enhancement approach to its work, as detailed below.

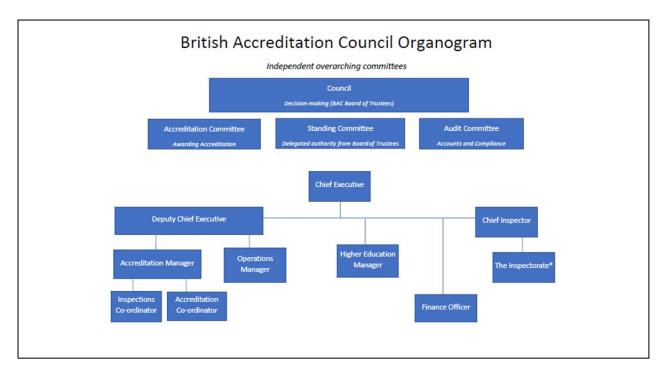


Figure 4. British Accreditation Council organogram

BAC has regularly undertaken an annual review of staff salaries, with small inflationary uplifts being given to all staff members every year since the last review. Following the recommendation of the Annual Financial Audit in 2019–2020, BAC now provides staff members with individual annual salary confirmation letters and confirms any changes to the flexible working arrangements or amendments to employment contracts that took place during the previous year contingent on a review of how well such flexible working arrangements have worked. BAC was commended in the latest Annual Financial Audit in 2022–2023 for its continual commitment to improvement, which was reported to the Audit Committee at the January 2024 meeting.

In April 2022, a wider review and benchmarking activity of staff salaries benchmarked to job descriptions in other not-for-profit organisations took place. The review had two purposes: first, to provide the Standing Committee, acting within its associated remuneration responsibility role, with information for a periodic staff salary benchmarking exercise. The Committee was then able to make an informed decision on current staff salaries by checking that BAC staff were paid fairly and at a rate that aimed to motivate, retain and, in the event of replacement, attract high-quality staff members. The second purpose was to review the financial impact of an annual percentage increase applied to existing salaries at 3%, 5% and 7%. Using a comprehensive dataset and assessing against the charity sector benchmark, it was demonstrated that all BAC staff members were paid in consideration of benchmark standards.

BAC has a range of additional benefits that the staff can access, which are detailed in the employee contracts (evidence 22), as well as some informal but traditional low-value regular gifts, such as vouchers in December, individual birthday treats and chocolates in spring. Team-building activities, such as online quizzes, take place regularly, with plans to further develop away days to build on team working practices. In 2023, we started an annual social activity following the October Council meeting as gratitude for the continued support given to BAC. Recognising the valuable contribution

of the staff and stakeholders in this way contributes to a positive working culture and enhances the overall effectiveness of BAC.

Roles and responsibilities

BAC updated all staff employment contracts in September 2022 supported by our HR contract provider Worknest. All contracts were updated to take account of any changes in recent UK legislation and fully embedding any additional clauses the staff had concerning such items as flexible working.

As per the recommendation from ENQA, the Chief Inspector's contract of employment was reviewed and revised to clarify that the role is not that of a member of the inspection team engaging in determining recommendations and judgements made as a result of inspection activities. Instead, any involvement/attendance by the Chief Inspector during inspection meetings is for monitoring activities only, and a budget is provided for the activity (evidence 23).

The Chief Inspector produces a formal report after monitoring an inspection, which covers the preparation, conduct and reporting of the inspection (evidence 13). As a result of this process, the inspector's strengths and areas to improve are identified, with any development needs identified to aid continuous improvement. Where possible, the Chief Inspector talks to the provider regarding its views. This ensures that providers can see that BAC has a focus on feedback and obtaining the institution's views. After an inspection has been confirmed with an inspector, a copy of the latest monitoring report will be sent as a reminder for the inspector of any areas to improve, again to aid continuous development.

At the same time, the Employee Handbook was completely rewritten with an annual cycle of review embedded while retaining the ability to make additional necessary changes as employment law dictates. For example, BAC's most recent version of the <u>Employee Handbook</u> came into effect on 6 April 2024. It includes new employee rights concerning parental and carer leave and the submission of flexible working requests. BAC is committed to preserving the integrity and impartiality of the inspection process and upholding the rights and welfare of the staff.

Subsequently, BAC instructed lawyers to work with the Chief Inspector to review the contracts BAC uses for the pool of BAC inspectors again (evidence 24) to make them compliant with changes to the GDPR requirements. The Privacy Policy and the Health and Safety Policy were updated in September 2022. Checking that all employment contracts were compliant with UK legislation and up-to-date enabled BAC to practice more enhancement-based activities and embed a staff well-being philosophy and proactive approach to staff development. Over and above the basic legal requirements, such as St John's ambulance first aider training and annual health and safety checks, BAC has also invested in the training of a staff member as a mental health first aider, the membership for all head office staff members in the Well-being Solutions employee assistance programme (evidence 25) and an in-house webinar training programme for BAC inspectors about mental health issues to be mindful of when conducting inspections.

Continuous Professional Development (CPD)

Investing in staff development is a key principle of the BAC Chief Executive and is supported by the Council. We have recently invested in an online learning platform called LearningNest to provide the staff with regular online mandatory training. In 2023, all staff members completed the following training packages via e-learning:

- Personal Data Protection 50 minutes CPD certified
- Keeping Information Secure (Global) 45 minutes CPD certified
- Respect in the Workplace 40 minutes CPD certified.

Staff members are also encouraged to attend external training events, both face to face and online, and share relevant learning as appropriate with other staff members at the weekly online team meetings and record it on the CPD spreadsheet (evidence 26) maintained by the BAC Operations Officer. The Higher Education Manager has specific responsibilities to keep up to date with international higher education trends and developments. In addition, other core members of the staff, such as the Deputy Chief Executive and Accreditation Manager, are supported in attending various higher education events to expand their knowledge and understanding in these areas (see examples provided below). BAC has resources in place to upskill staff for gaps or new skills as needed through an annual training fund for each staff member and paying for training required.

Utilising expertise in our network

BAC has a small but cross-functional core staff team of nine (7.6 full-time equivalent). We also benefit from the wide-ranging expertise of the Council members and committees, the BAC Inspectorate and specialist consultants and advisors. For example, the permanent Finance Officer role is supported by an external financial consultant who is a fully qualified accountant. This arrangement has led to greatly improved financial reporting, as noted by the Audit Committee at its meeting (evidence 27). It has also supported the development of the Finance Officer, who has taken on more in-house responsibilities.

In addition, BAC's Senior Advisor (External) has led several strategic activities, including:

- The standards review and subsequent creation of the Common Quality Framework in 2021–2022
- Delivering webinars, including in conjunction with a Council member in 2021–2022
- Chairing the ENQA working group on the quality assurance of micro-credentials on BAC's behalf in 2022–2023
- Leading the development of the Micro-credentials Scheme pilot in 2022–2023
- Working with the Higher Education Manager in coordinating the renewal process for ENQA membership and listing on EQAR this year.

The members of the BAC Inspectorate, who are freelance, also work across the organisation, not just during inspections, allowing us to benefit from their knowledge and skills to enhance our operations. As well as participating in focus groups and working groups and providing feedback as part of their relationship with BAC, the inspectors have also undertaken other paid project work. This includes the following:

- In 2021, a Senior Higher Education Inspector worked with the Chief Inspector to produce an online training module for all BAC inspectors about conducting online inspections.
- In 2022, a Higher Education Inspector led work on initial scoping with other BAC inspectors for a potential liaison scheme (project currently on pause).
- In 2024, BAC produced a Mental Health Awareness webinar for inspectors by utilising inspector expertise to develop it with the Chief Inspector and Deputy Chief Executive.

BAC's ability to be flexible in this way and to make use of external expertise in areas where it can add the most value is more cost-effective than adding more permanent staff and has proved to be an efficient and effective way of working for the organisation.

Informing stakeholders and wider engagement

Following the last ENQA review, BAC has introduced annual stakeholder events (evidence 07). These are regular opportunities to engage with our stakeholders, reflect on current practices, inform the stakeholders about our strategic activities and strengthen important connections within the BAC community. In March 2023, the themes of the event were internationalisation, qualifications and recognition. Keynote speakers provided overviews of the topics, followed by case studies from accredited providers. This online event had over 50 attendees across eight countries, including Switzerland, Ghana and South Africa, who listened to BAC's update and heard from our speakers.

At our most recent event on 11 April 2024, we delivered a hybrid event for over 50 attendees to celebrate our 40th anniversary (evidence 03). The programme included panel sessions, reflecting on BAC developments over the years and more recently, an ENQA workshop and a discussion on the future of Artificial Intelligence (AI) in education and quality assurance.

BAC uses its ENQA membership to engage with the wider quality assurance community. After the last review, BAC nominated the Senior Advisor (External) for ENQA reviewer training and a member of the Accreditation Committee to continue membership in the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) board.

BAC supported the attendance of the Chief Executive at the annual European Quality Assurance Forum (EQAF) event in person in 2019 and online in 2020. A workshop was delivered by the BAC Senior Advisor (External) and Deputy Chief Executive at EQAF in 2023 following the chairing responsibility for the micro-credentials working group.

ENQA membership forums and General Assemblies were attended online in 2020 by the Chief Executive and subsequently in person by the Chair of the Council, Higher Education Manager and Accreditation Manager. The Higher Education Manager and Deputy Chief Executive also attended a two-day ENQA event held in Cologne in May 2022 for recently reviewed agencies.

BAC has also participated in webinars offered by EQAR and ENQA and responds to consultations and surveys, such as the recent survey from EQAR on the use and interpretations of the ESG. Within the UK, BAC has also attended events offered by WonkHE and UKCISA, which focused on student engagement.

Engaging with the wider quality assurance community, particularly through our ENQA membership, is hugely important to BAC, which is why it is incorporated into the BAC strategy. Through this and delivering our own events and communicating with our stakeholders, we have embedded regular opportunities to reflect on current practices and inform our stakeholders of our activities.

Financial resourcing and infrastructure

BAC maintains a large financial reserve equivalent to 18 months of operating costs to ensure the organisation can continue in the face of unforeseen challenges. Risk mitigation is a high priority for

BAC, and that includes financial management. We have strengthened our approach to monitoring risks and introduced a new risk matrix in 2023 that emphasises impacts when assessing risk. The Audit Committee has a standing agenda item in every meeting to review a dashboard of risks and a paper focusing on a specific area as appropriate. BAC takes a proactive position towards identifying, assessing and addressing potential risks to its operations to ensure the organisation continues to have a positive impact well into the future (evidence 08).

BAC has extensive and transparent financial controls and voluntarily undergoes an external audit each year despite being below the audit threshold. BAC has a financial policy whereby we aim for a breakeven budget with expenditure matched by income. Income from investments is used to support developmental activities. BAC has independent financial auditors who have a reputation for independence and rigour. Responsibility is divided among the staff members who deal with banking protocols and finances. BAC's external auditor makes recommendations on internal control that arise out of the external audit and with reference to sector best practice. Voluntarily undergoing a financial audit demonstrates BAC's commitment to accountability and ensures the integrity of our financial reporting.

Ethical and transparent use of finances

Since the last ENQA review, BAC has introduced an Annual Report Summary each year (evidence 28), which provides a detailed overview of its activities and financial standing for its stakeholders over the previous financial year. The <u>document is available on the website</u> and shared with accredited providers as part of the annual accreditation invoicing activity. BAC needs to be transparent about its financial position and activities to foster trust and further engagement with its stakeholders. Aligning with its charitable objects of raising standards, the BAC Council approved a reduction of fees for institutions from low- and middle-income countries on the World Bank Developing Countries list, the details of which are available in the <u>fees brochure</u> on page 16 (evidence 29). This allows those institutions, which may otherwise have been unable to do so due to financial barriers, to access accreditation with BAC. In addition, BAC acknowledges that in-country economics and world events can cause financial issues for institutions, and it has the flexibility to agree on payment plans to allow institutions to maintain their accreditation. BAC has a transparent refund policy in case an institution has to withdraw from the accreditation process prior to its inspection taking place.

A review of BAC's investments was conducted in 2022. BAC has shifted to a directly invested investment portfolio with more transparency, flexibility and the option to choose specific ethical screens (evidence 30). The Investment Manager facilitated a workshop on 8 March 2022 for Council members to review and choose the ethical screens to apply to the proposed new portfolio. They were approved by the Standing Committee and Audit Committee at a 'deep dive' exercise on 17 March 2022.

The new investment portfolio has increased visibility in terms of where funds are invested, as well as the ethical screens. Changes to investments can be made quickly through the Investment Manager. Knowing where the funds are invested allows BAC to more clearly demonstrate the alignment of its investments with its values and charitable objectives while ensuring this is never to the detriment of the BAC possessing sufficient financial resources to operate effectively.

In recognition of a change in working practices, BAC moved to new office space in 2020, which is smaller but has onsite meeting rooms available to reduce the need for external venues for events, thus saving financial and environmental costs.

BAC donated furniture that it no longer used to charitable causes by working with a company that collected and distributed the furniture.

As a charitable organisation and in line with our strategy, BAC must minimise its impact on the environment wherever possible.

As part of adapting to home working during the pandemic and embedding flexible working arrangements within the organisation, BAC offered an equipment allowance for staff members to support them in creating comfortable and efficient working environments at home. Responding to the needs of the staff in this way demonstrates BAC's commitment to equity and staff well-being and ensures work can be carried out as efficiently as possible.

Investing in growth

BAC is committed to taking a strategic approach to growth, and it has prioritised plans and activities that will attract a wider range of new providers. It has a three-tiered growth plan of short-, mediumand long-term goals with two main objectives:

- To increase the number of accredited providers, and
- To explore other sources of income.

To support BAC's growth activities, it has drawn funds from its investment income to create the Development Fund (evidence 31), which is managed separately. The use/spending of the Development Fund is regularly overseen by the Audit Committee, and it has already been used or allocated for several projects.

For example, the Audit Committee has identified that currently, the most promising prospects for growth in the short term lie internationally. As a result, BAC is focusing on developing an international strategy. It agreed on a six-month contract with Cormack Consultancy Group, which started in February 2023. Its remit was to identify specific opportunities with providers that met BAC accreditation eligibility requirements. We have had several initial meetings and received one application through this route. BAC is also exploring projects outside of accreditation, including how to support universities in Ukraine. We created a one-page document about BAC so that trustees and other BAC representatives have material to take to meetings to use if appropriate on their travels for their own organisations or other business engagements (evidence 32).

Overall, BAC is convinced that these systemic developments relating to resources have the potential to safeguard its strategic aims and will ensure it is better prepared for a future where quality assurance is becoming even more globalised. As BAC is a voluntary External Quality Assurance organisation, it becomes imperative that it has a solid basis for future collaboration and expansion across the ENQA network and beyond.

Part III – SWOT analysis

Strengths, Weaknesses, Opportunities and Threats as identified by BAC

Strengths	Weakness	Opportunity	Threats	Future potential actions or plans
BAC has flexibility through its six inspection schemes, agile workforce and voluntary nature in its governance, creating a strong independent organisation that has been operating for 40 years.	Intended plans for growth despite being a strong organisation may put additional strain on the core staff team.	The Common Quality Framework means BAC has the infrastructure to actively pursue opportunities/activities to expand products and services.	Competition in the global quality assurance arena may pose challenges into the future.	BAC conducts regular reviews of its processes to ensure they meet the needs of external stakeholders. BAC continues to develop products and processes to ensure they remain world leading in terms of quality assurance. BAC is working to improve its profile in all markets in which we operate. BAC is increasing investment in developing and promoting BAC across all markets. BAC has built and continues to develop links with stakeholders through webinars, news updates and the Provider Journey. BAC maintains strict cost controls to allow competitive prices to be offered to existing/new providers.
BAC is recognised by the British government as an integral element of the UK student visa infrastructure. This was demonstrated by a recent invitation to the Home Office's safeguarding of migrants workshop.	BAC accreditation is only recognised for visas for short-term study through the Standard Visitor visa route. It is dependent on providers voluntarily choosing to be inspected. There is no regulatory role.	There are opportunities to be more involved in the UK student visa system by taking part in workshops and developing lines of communication with the Home Office.	The UK government's student visa regime may change.	BAC has developed a range of value-added products, including webinars and the Marketing Pack, to attract and retain providers. This reduces the susceptibility of them to withdraw in the extreme event of BAC being removed from the list of UK government-approved accrediting bodies. BAC has increased due diligence in accepting new and re-accreditation applications and developed and implemented a more rigorous inspection process to build and maintain confidence.

Strengths	Weakness	Opportunity	Threats	Future potential actions or plans
BAC has a small but experienced head office team that can offer support and advice to BAC stakeholders through webinars, meetings and communications.	BAC needs to invest more in digital marketing and a social media presence to promote the impact of BAC nationally and internationally and also to be recognised globally. This is a weakness that BAC intends to turn into an opportunity.	The website needs refreshing to be more user friendly and to develop further promotion and active engagement in the quality assurance community.	Loss of key staff can potentially create challenges because we have a small cross-functional staff team. However, BAC has developed a knowledge base and resources that can assure an effective and efficient transition when any staff member leaves.	BAC has standard operating procedures for common processes so that other staff members can take over when one may leave. Further investigation into a more dynamic use of social media and investment in website development are the areas that BAC intends to undertake over the next five years. BAC has further development plans for effective sharing of information across committees through regular online away days/training events, also the annual inspectors' training day.
BAC has a diverse provider pool from beyond the confines of the UK, which allows a flexible but robust approach in assessing standards for different institutions in a range of circumstances and perspectives and giving attention to the providers' specific needs.		Developing good practice in our integrated use of the data and information collected from BAC inspections and other work is an opportunity. Using AI effectively in quality assurance activities should be considered for the future.		BAC is considering expanding the use of candidacy accreditation to increase the accessibility of BAC accreditation to newly established providers. This will demonstrate the BAC commitment to its objectives of raising standards in international education.
BAC is a not-for-profit organisation with charitable objectives and a secure financial position supported by our investments. We have transparency, flexibility and the option to choose specific ethical screens through our directly invested portfolio.	 BAC has only one consistent source of income through accreditation fees. As BAC accreditation is voluntary, income can be more volatile than in the case of membership or statutory quality assurance bodies. This can limit our resources. BAC investments values can change depending on stock market fluctuations. 	Through our Development Fund, BAC can invest income back into the organisation to develop its activities and add value for our community of providers. Further active engagement in the development of our ethical responsibilities is an opportunity.	As a registered charity, there is an ethical dimension to our work, which means BAC must ensure that our activities do not compromise our values, reputation and independence. This can be threatened by a changing global context.	BAC has embedded integrity and transparency across all its activities. As of April 2022, the new investment portfolio has increased visibility in terms of where funds are invested. Ethical screens and changes to investments can be made quickly through the Investment Manager.

The process of producing the SWOT was completed through contributions from discussions at BAC Council meetings, with individual BAC staff, members of Council at the Standing Committee meetings, feedback from focus groups consisting of committee members and inspectors at the regular event discussions as well as from stakeholders including providers at the annual stakeholder event.

The Annual Stakeholder Event in April 2024 also highlighted the words the stakeholders associated with BAC. The graphic below demonstrates many of the strengths characterising BAC, which are also highlighted in this SAR. (Figure 5)



Figure 5. Graphic to demonstrate stakeholder feedback of some of BAC's strengths

Overall, in managing the SWOT elements highlighted, the enhanced BAC governance processes outlined at the beginning of this SAR mean that BAC is regularly reviewing organisational weaknesses and threats through its internal quality assurance processes – specifically, its risk register. BAC uses a dynamic RAG (red, amber, green) rating for risks, with mitigating actions included (evidence 33), which helps us to be resilient but not complacent to weaknesses. BAC endeavours to evaluate weaknesses through the lens of opportunities and to operate cross-checks that can identify implications across strengths, weaknesses, threats and opportunities, highlighting their interdependencies. We regularly discuss the opportunities BAC has at Council meetings, having instigated a discussion session as part of the format of the regular agenda. We are conscious of potential threats identifiable in countries or institutions that may not meet our ethical principles.

BAC sees itself as an organisation with potential. BAC accredits at different education levels, not just higher education, which gives a good understanding of how educational continuity can be achieved. BAC has a well-established inspection methodology and highly qualified and experienced inspectors who take a collaborative and developmental approach to inspections. BAC has multiple inspection methods that can learn from each other and benefit from review processes at non-cyclical points. BAC has a Common Quality Framework that helps its messaging about the benefits involved in BAC accreditation and helps providers associate easily with the quality principles promoted. BAC is a full member of ENQA and INQAAHE and is listed on the EQAR register. These affiliations influence our strategic direction and international collaborations. Furthermore, BAC quickly learned and adapted to the change in circumstances during the COVID-19 pandemic. We have embedded new ways of working, showing the organisation to be resilient and resourceful. BAC is committed to continuous improvement and chooses to undergo an Annual Financial Audit over and above legal requirements, and the report is shared in the public domain.

Therefore, BAC is confident that it can keep track of risks and opportunities and work towards meeting the challenges specific to an ambitious organisation

Part IV – Conclusions

The time since the last review has been one of reflection and consideration of how to implement the recommendations from ENQA. The COVID-19 pandemic resulted in some major changes in the ways BAC operated. These included changes to the inspection method to develop the hybrid approach and using the time to review our governance structures and how to best use the expertise that BAC had access to.

The expertise and input from the Council members have contributed towards BAC's increasingly international focus and support our efforts in being more active in the European quality assurance family. The flexibility and independence of BAC as an organisation have allowed us to transition to a more enhancement-driven approach to quality assurance and to invest money and resources in staff development and changes to our accreditation methods.

As an organisation, we have made good progress. Our scheme reviews, training of inspectors and Accreditation Committee members and internal quality assurance changes have led to improvements in our reporting and inspection processes to include more evaluative content in the inspection reports. While inspectors have always used the providers' internal quality assurance processes to determine whether they met BAC inspection standards, how they demonstrate this has been made more explicit in the reports and is proving a positive development.

BAC is aware that some challenges lie ahead and more focus will need to be given to our communication of information through the further development of the website and a more active social media presence. While we have Annual Stakeholder Events and ensure that we communicate with our providers regularly, one of our goals is to foster a community that can share best practice. We also aim to consider how our providers can benefit from the knowledge and experience of the entire BAC provider community, not just those accredited under the IHE Scheme.

In summary, BAC can demonstrate that we are compliant with the ESG and are strategically enhancing our activities to give us a stronger potential for collaboration with and contribution to the quality assurance community and higher education.

Annex 1

BAC mapping of Part 1 of the ESG against the IHE Scheme's minimum standards

BAC Standards & Key Indicators							
European Standards & Guidelines 2015 Internal Quality Assurance	Governance, Strategy, and Financial Management (KI 1–3)	General and Academic Management and Administration (KI 4–10)	Teaching, Learning, and Assessment (KI 11–13)	Student Support, Guidance, and Progression (KI 14–19)	Premises, Facilities, and Learning Resources (KI 20–25)	Quality Management, Assurance, and Enhancement (KI 26–28)	Online, Distance, and Blended Learning (if applicable) (KI 29)
1.1 Policy for quality assurance	1.3–1.5			14.4, 14.7		26.1–26.3 27.1–27.7 28.1–28.4	
1.2 Design and approval of programmes		7.1–7.4 10.4	12.2			27.2, 27.3, 27.7	29.1
1.3 Student-centred learning, teaching, and assessment	1.5		11.1, 11.5–11.8 12.1–12.4, 12.6, 12.7	15.5, 15.6, 15.8 19.4	21.2 24.4		
1.4 Student admission, progression, recognition, and certification	2.1	5.8, 5.10 8.1–8.6 10.2, 10.4	12.4 14.2 15.2–15.4, 15.7, 15.8			27.1, 27.2, 27.5–27.7	
1.5 Teaching staff		6.2, 6.4–6.8 9.1–9.3	11.1, 11.9 13.1–13.4			26.1 28.2	29.2
1.6 Learning resources and student support	2.2 3.1	5.1, 5.2 7.4 10.5	11.6, 11.9 13.1–13.4	14.1–14.7 15.1–15.8 16.1–16.4	22.1–22.3 24.1–24.4 25.1–25.4		
1.7 Information management		5.4	12.1			26.1–26.3 28.1, 28.3 27.1–27.7	
1.8 Public information	2.4	8.1, 8.4 10.1–10.5	12.1			27.4, 28.2	
1.9 Ongoing monitoring and periodic review of programmes	2.2	7.1–7.4				26.1–26.3 27.1–27.7	
1.10 Cyclical external quality assurance	1.2					26.1 27.2, 27.4	

LIST OF EVIDENCE

Item	Title of evidence
number	
01	IHE Scheme updated standards
02	BAC Annual Report 2021–2022 – demonstrating the implementation of the articles
	with the disposal of assets to charitable objectives (page 7)
03 (folder)	BAC 40th anniversary video with BAC milestones
04	Common Quality Framework
	Online: <u>https://www.the-bac.org/wp-content/uploads/2024/05/Common-Quality-</u>
	<u>Framework.pdf</u>
05 (folder)	BAC Committees and Council Terms of References
06	Trustees' terms of tenure
07 (folder)	Annual Stakeholder Event 2022 programme
	Annual Stakeholder Event 2023 programme
	Annual Stakeholder Event 2023 write-up
	Annual Stakeholder Event 2024 programme
	Annual Stakeholder Event 2024 write-up
08 (folder)	BAC Strategy 2021–2026
	Action Plan January 2024
09	Companies House – BAC Annual Financial Audit
	also at: <u>https://find-and-update.company-</u>
	information.service.gov.uk/company/01828990/filing-history
10	Inspector guidance
11	Online inspector training
12	Inspection type assessment template, highlighting risk criteria
13	Example of Chief Inspector's feedback on inspectors resulting from monitoring visits
14 (folder)	Record of Evidence – used by inspectors to capture their findings during inspections
15	Inspector Handbook (This is in the process of being updated but the current version
	is provided as an example.)
16	Example of BAC reports with evaluative comments and inspector names
17	BAC IHE report templates with guidance on Internal Quality Assurance
18	Report Writing Guidelines
19 (folder)	Inspectors' event programme 2022 and slides
20	Accreditation Committee Report Summary Guide
21	Accreditation Committee Member Handbook
22	BAC Employee Contract template 2022
23	Proposed budget for monitoring inspections
24	Inspector contract template
25	Well-being Solutions employee assistance programme
26	Staff CPD record
27	Minutes of Audit Committee meeting 1 June 2023 – improved financial reporting
28	Annual Report Summary 2022–2023
29	BAC fees brochure 2024–2025
	also at: https://www.the-bac.org/wp-content/uploads/2024/06/BAC-Fees-
	Brochure-2024-25.pdf
30	Ethical investment management
31	Development Fund planning table
32	BAC one-page overview for Council members
33	Risk register

GLOSSARY OF TERMS

Accreditation

For BAC, the process of accreditation involves a formal application, an onsite inspection undertaken by an inspection team to produce a thorough report on the institution by assessing its performance against the IHE Scheme and a decision made by the Accreditation Committee.

Accredited

BAC uses the term 'accredited' when the Accreditation Committee awards accreditation because an institution has met the standards of the IHE Scheme. Accreditation is held for a period of four years.

Articles of association 'articles'

The objects that set out the charitable purpose of the organisation, i.e. what it is setting out to achieve.

Charitable 'objects'

Articles that set out the legal standing of the organisation, encompassing any legislation that may govern internal and external relationships.

Independent

For BAC, this refers to the independence of the organisation, i.e. its ability to make financial and governance decisions independently of the government or any other body. It does not differentiate between public or private institutions.

Independent Higher Education Scheme (IHE Scheme)

This is the scheme that providers offering full degree programmes are inspected against.

Inspection area

There are seven inspection areas which make up the IHE Scheme. Each is about a different operational aspect of an institution. An inspection area is a title used to group the inspection standards and key indicators which are used by the inspection team to examine in detail whether an institution meets, or does not meet BAC standards.

Inspection standard/s

Each inspection standard is a different aspect of the overall inspection area. It is then further broken down into a number of key indicators to examine the standard in detail. Each standard can be 'Met', 'Partially Met', 'Not Met' or 'Not Applicable'.

Inspector

BAC uses the term 'inspector' rather than 'reviewer'. An inspector is an experienced quality assurance professional who is contracted by BAC to inspect an institution and assess its performance against the standards of the IHE scheme.

Key indicator/s

A key indicator is a detailed statement linked to an inspection standard within an inspection area. It has a 'Yes', 'No' or 'Not Applicable' answer, which is used by the inspection team as a quantifiable measure to determine whether an institution being inspected meets BAC standards.

Re-accreditation

This is when an accredited institution applies to go through the inspection and accreditation process again.