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**Mr. Padraig Walsh**  
President

ENQA-European Association for Quality Assurance in  
Higher Education  
Avenue de Tervuren, 36-38  
BTE 41040 Brussels  
BELGIUM

Barcelona, 14th September 2017

Dear President of ENQA,

As you may already know, on 21 June the ENQA Board reconfirmed AQU Catalunya's full membership of the Association for a five-year period. This is the third time that AQU Catalunya has successfully undergone an external review coordinated by ENQA (2007, 2012 and 2017) and we are therefore familiar with the positive development made by ENQA in these 15 years.

Nevertheless, having made a thorough analysis of the final 2017 external review report and the Board's decision, we would like to express our disagreement with the assessment made of the level of conformity of substantial compliance with standards 2.2, 2.4, 2.6, 3.1, 3.3., and 3.4.; with the Board's overall judgment of substantial compliance, as well as the formal grievance we make that this decision is non-appealable, which leaves us – the Agency and all other agencies that find themselves in a similar circumstance – totally defenceless.

In the 2012 review, ENQA considered that AQU Catalunya was in full compliance with 12 standards, substantial compliance with 2 standards and 8 recommendations for improvement were made. In 2017 the Agency has been assessed as being in full compliance with 6 standards, substantially compliant in 8, and 16 recommendations for improvement were made. In other words, within a period of five years the number of standards in full compliance has halved and the recommendations for improvement have doubled. While we recognize that the Catalan agency did pass the external review, the outcome implies that during this five-year period events have led to a significant reduction in the level of compliance with the standards.

What is striking in our case is that the external report mentions no substantive fact to justify such a substantial drop in the overall assessment. Neither can it be clearly attributed to the fact that reviews are based on two different versions of the ESG (2005 and 2015), as the more



recent version is clearly a continuation of the previous one. This would leave us with the most plausible explanation being the degree of discretion in interpreting the criteria for assessing compliance with the standards, which is of great concern to us in that this would undermine the consistency of reviews undertaken by ENQA.

After carefully analysing the final external review report, the annex to the present letter sets out the details of our position regarding the standards and outcomes that we disagree with. We consider that, in carrying out the assessments, various things have taken place that we wish to put before the Board for its consideration and resolution. In no way is this meant as a list of grievances because of a grudge or resentment – quite the opposite. Our reflection is based on serenity and critical self-analysis, and as such we point out certain specific aspects that we believe are important enough to deserve your special attention:

1. Unlike in previous reviews, and in accordance with ENQA's new "Guidelines for ENQA Agency Reviews" published in 2016, **the draft final report of the 2017 review received by the agency did not include the assessment proposal for each standard.** This clearly leaves an agency being reviewed in a position of helplessness, given that the reading in isolation of the evidence and the analysis of compliance, unless it is very clear, will raise doubts about the level of compliance with what each standard is being assessed against. In our case, for example, standards 3.3. and 3.4. were not addressed in the revised draft because, from our interpretation of the report, we were in full compliance with them; the same is true for comments and recommendations, which we would have addressed in a more evident way if we had been aware of their impact on the final assessment. We therefore recommend that the preliminary assessment be transparent even if it is only temporary because this is more likely to inspire trust in the reviewee, who can at least say they have been able to put forward their points of view together with all the available information.
2. A more strategic issue, and one that can help safeguard the coherency and consistency of reviews, is the fact that from the second review onwards **the starting point should be the contents of prior reviews and the levels obtained.** In addition to focusing their efforts on the current self-assessment report, a review panel should be asked to review previous external reports, especially decisions regarding improvements implemented subsequent to the previous review. It makes no sense for compliance with all the improvements proposed by a previous panel to lead to an outcome that is clearly inferior to the previous one. Levels of compliance should therefore either decrease or increase in relation to the evidence of the results obtained from the modifications undertaken by the Agency in the new period under review.
3. We consider that **it is highly inappropriate for analytical factors not dealt with in the draft report to be included in the final report.** In the first place because this creates uncertainty regarding the actual factors that have been taken into account in the final

assessment of the standard, and secondly because of the agency's total defencelessness in not being able to appeal them. If in the process of an appeal an agency provides sufficient evidence to override a judgment issued in the draft report, it is equitable to set aside the judgment, and under no circumstances should new elements be added to uphold a previous assessment that is no longer substantiated because they cannot be appealed. In any case, the panel is responsible for ensuring that all judgments issued are based on evidence not interpretations, and that assessments are supported with evidence.

4. **Assumptions and opinions of the panel that are not based on evidence should go no further than a caveat or enhancement proposal** nor under any circumstance should they condition the assessment of a standard nor be raised to the category of a recommendation. The opinions and views of the panel are always welcome and agencies should consider them as factors for reflection and improvement. It is inappropriate, however, for an opinion based not on evidence but on impressions to influence a review procedure in a significant way because of the negative repercussions on all levels (bias in the review, unease and discontent in the unit being reviewed, loss of trust in those coordinating the review, etc.).
5. As was the case in point 4, if **the contextual factors in which the external review of a country is organised** do not infringe any standard and their solution lies beyond the agency's jurisdiction, they **should be referred to as no more than a caveat or enhancement proposal**. It would be unfair for them to be raised to the level of a recommendation or to even influence the final assessment.
6. We believe that **giving more importance to an anecdote in the assessment of overall performance**, where there is an absence of non-compliance with the standard, aside from affecting the consistency of the assessment, is a disproportionate way to proceed and **distorts the perception of reality**. Seen from this perspective, it will be very difficult for any agency to achieve full compliance with any standard.
7. In spite of the fact that the *Guidelines for ENQA Agency reviews*, section 2.4. *N.B.* state that *"The panel is expected to review the current status of an agency and not planned or foreseen developments which, for example, may affect the legal status of an agency and its operations in a substantive way,"* we notice that **the assessment of certain standards was conditioned by procedures that are still not operational**, due to issues beyond the agency's control. We consider that it is not possible to assess something that has not yet taken place, in addition to the fact that agencies need time to think about, design and initiate procedures.
8. Lastly, we believe it is not good practice to **limit the possibility of appeal solely to agencies that have received an unfavourable report**. This approach would make sense



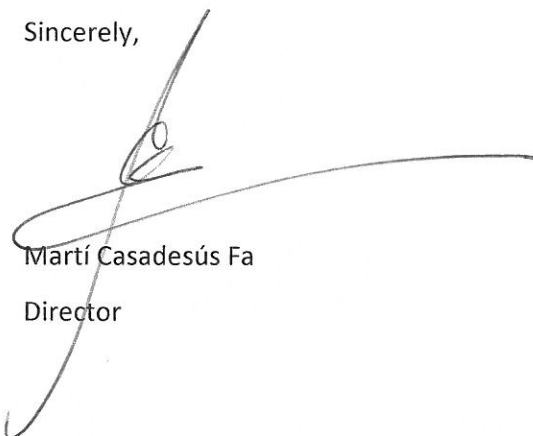
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if reviews were dichotomous (favourable/unfavourable), but where there are different levels of assessment there is the need to safeguard their legitimate self-defence. This is one aspect envisaged in the ESG that ENQA should make provision for, if only for the purposes of consistency. In this regard, we add that it is not a good institutional practice to charge a fee for an appeal, even though this is returned in cases where appeals are upheld. This practise may hamper the process by coercing a reviewee's willingness as well as decisions made by the reviewers.

Given that ENQA has no formal appeals procedure for agencies, we ask the Board to analyse in detail the remarks set out in this letter and to take appropriate measures regarding the 2017 review of AQU Catalunya in particular and, more specifically, the management and handling of the entire process in general.

AQU Catalunya believes that in the 2017 review it successfully demonstrated its progress since the previous review, and it is for this reason that it is difficult to understand the reasons for the outcome, and I speak for both within and outside of the Agency. In spite of our dissatisfaction, however, I can assure you of the Agency's commitment to quality, compliance with the ESG and the intactness of the EHEA. We are of the firm belief that this experience will help us all to play our full part in ensuring the coherent and consistent review of QA agencies, which benefits both the strengthening and improvement of the European Higher Education Area.

Sincerely,



Martí Casadesús Fa

Director



## ANNEX. Analysis of AQU Catalunya's final external review report

Only the standards that, according to the final assessment, AQU Catalunya is not in agreement with are reviewed below.

### In Standard 3.1. Activities, policy and processes for quality assurance.

There are important differences between the wording of the analysis and the draft submitted to AQU Catalunya, in particular the inclusion of new factors. Firstly, an opening paragraph was added that summarises the assessment of all the other standards, which we believe also conditions the assessment of the standard and we have subsequently been unable to appeal this. Secondly, new factors were also added to the second paragraph of the analysis, for example teaching staff, which lies beyond the scope of the review and should not be referred to, as well as certain contextual aspects in the country, such as the *ex-ante accreditation of programmes, the quality of teaching staff and changes in programmes in between accreditation rounds* which, according to the panel, and based on other education systems, are aspects that they consider to be *part of internal quality assurance*. Lastly, the recommendation included in the report, which is based on paragraph 3 of the analysis, is an adaptation of the one in the draft report that focuses on institutional accreditation, a process that, as is explained above, is still in a very early stage and not yet operational. We are of the opinion that it makes no sense to include recommendations referring to institutional accreditation, given that this does form part of the scope of the review (chapters 5 and 6 of the self-assessment report), and that it only appears in chapter 14: "Current challenges and areas for future development".

Furthermore, AQU Catalunya takes the view that it is inappropriate to include in the final reports analytical factors that have not been covered in the draft report. In the first place because this creates uncertainty as to the actual factors taken into account in the final assessment of the standard, and secondly because of the agency's total defencelessness in being unable to appeal them.

In addition, the assessment of the standard appears to have taken into account contextual factors in the country that should have no influence on the assessment unless the panel is in possession of evidence showing that these processes have a negative impact on the university system, which is not the case.

Lastly, AQU Catalunya notes that, in accordance with the *Guidelines for ENQA Agency reviews*, section 2.4. *N.B. The panel is expected to review the current status of an agency and not*



*planned or foreseen developments which, for example, may affect the legal status of an agency and its operations in a substantive way, the formulation of a recommendation based on a process that is in an initial stage and that is still not operational, given that it is not possible under existing regulations in Spain, cannot condition the final assessment. It is moreover totally disproportionate for this one process to condition all of the other activities, policies and QA processes that account for the overwhelming majority of the Agency's activities consolidated over the last five-year period.*

We also believe that the evidence section of standard 3.1. in the final external review report totally upholds the fact that the Agency fully complies with standard 3.1. Compared to the previous review, there is no negative evidence at all to justify a reduction in the level of compliance.

### **In Standard 3.3. Independence.**

As in the previous standard, the final version of the report contains remarks that were not in the draft received by AQU Catalunya, which it was unable to dispute, such as the following: *"However, the changes in the legislation did not increase the agency's independence of the Catalan higher education institutions. All rectors of Catalan higher education institutions are now members of the Governing Board, as well as 7 representatives of Social Councils of the public universities and 3 academics who are employed by a Catalan university."* It should be noted that this composition of the Governing Board was established in accordance with legislation in 2003 and was therefore the same composition as in the ENQA reviews of 2007 and 2012. In the 2015 reform, in order to comply with the requirements of ENQA reviews, AQU's Governing Board was expanded to include students and stakeholders. In any case, it is important to stress that while the Governing Board is a broad-based body, its functions are clearly separate from review, as stated in the final report: *The Governing Board is not involved in the development of the procedures.* It should be noted that this body also works as a Standing Committee.

It is surprising that, regardless of the efforts by the Agency and the Government of Catalonia's Executive Council to totally resolve through new legislation the relevant aspects of independence pinpointed in previous reviews, which is recognised in the external review report, the analysis includes an opinion introduced by the panel that would also appear to influence the standard's assessment. More specifically, *"... the panel has some reservations about the current level of involvement of people who are active within the Catalan higher education System. As a rather small ecosystem the Catalan higher education system may be more exposed to the perception of conflicts of interest. This concern was further strengthened*





*during the review panel meetings with high-level representatives of the higher education institutions. During these meetings, the review panel noticed regularly that those institutional representatives did not separate explicitly their roles in the management of their own institution and their roles as members of bodies within AQU Catalunya".* It should be recalled that the rectors of the universities are on the Governing Board of AQU Catalunya precisely because of the positions they hold, and they therefore speak according to the role they represent. In our view, what should be analysed is whether the measures endorsed by the Governing Board constitute a conflict of interests, which has never occurred, and this is easy to prove as all minutes and agreements are publicly available on the AQU Catalunya website: [http://www.aqu.cat/aqu/estructura/organs/consell\\_direccio.html](http://www.aqu.cat/aqu/estructura/organs/consell_direccio.html). Furthermore, majority vote counting does not allow for a partisan decision to be made by a stakeholder group representing the Governing Board (rectors, labour unions, government authorities, students, etc.). The panel's concern, which ultimately takes the form of a recommendation when really it should be no more than a caveat, is based on conjecture, and it is unwarranted to attach more weight in the assessment of this standard to an opinion rather than the evidence.

The other aspect that appears to have influenced the assessment of this standard is the fact that, in certain external review panels, chairpersons of the Agency's subject-specific review committees were appointed as panel members, more specifically this occurred in 27% of the cases over the last five years. This decision, which in no way contradicts the ESG, as it sets up no conflict of interests and also ensures greater consistency in the application of the review criteria, was perceived as being a lack of independence and resulted in a recommendation. In any event, it should be stressed that decisions are made collectively and it is therefore impossible for one member of a committee or panel to influence an entire body's decision or ruling. It is surprising for what is clearly a minor and debatable issue to have played such an important role with regard to compliance with the standard and for it to lead to a recommendation, when it should in fact be referred to as an enhancement proposal or caveat.

In any event, we do draw attention to the fact that ENQA makes use of this mechanism in more critical situations where a conflict of interest may have occurred, for example in the composition of ENQA's Appeals and Complaints Committee, on which there are members who have been appointed as members of review panels, including one of panels that visited us. In this regard, AQU Catalunya points out that the members of AQU Catalunya's Appeals Committee, together with external reviewers that it uses, are individuals who are separate from all of the Agency's other QA procedures and under no circumstance can there be a conflict of interest as they are members of different panels.



From a careful reading of the standard and the guidelines, and bearing in mind the efforts made across the university system in Catalonia to address the recommendations made by ENQA, we are very surprised that the final assessment was influenced by unsubstantiated opinions (i.e. opinions not backed up by evidence) and by what is a very minor and debatable issue, in relation to which neither compliance with the standard nor the Agency's independence can be questioned under any circumstance.

#### **In Standard 3.4. Thematic analysis.**

In relation to this standard AQU Catalunya would like to focus on the paragraph in the analysis where it says *"Although the review panel values the broad range of reports AQU Catalunya has produced in the past, only the recent reports which integrate the results of quality assurance procedures such as ex-ante and ex-post accreditation, as well as the results of the surveys AQU carries out, fully comply with the focus of this Standard"*. It is surprising that the Agency's development was recognised as having been positive to the point that the panel itself considered that the latest reports fully complied with the standard, yet did not give this assessment. In this regard, it should be noted that the production set out by AQU Catalunya in the self-assessment report was the production from 2012 to 2016. If one takes into account all the reports issued, the Agency has produced numerous university programme reports across the university system, including those posted on the Agency's website: [http://www.aqu.cat/aqu/publicacions/informes\\_avaluacio.html](http://www.aqu.cat/aqu/publicacions/informes_avaluacio.html). It should also be taken into account that in the implementation of the new VSMA framework (the Agency's framework for quality assurance and review) the first results of the accreditation of new procedures were obtained in 2015. The Agency has therefore been diligent in producing reports.

Given AQU Catalunya's significant experience in publishing reports, the recommendation: *"The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its work programme, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform the higher education sector and broader society"* seems reiterative. It would also appear that the EUC website, which is mentioned around thirty times in the self-assessment report, was not taken sufficiently into account (the EUC website was inaugurated in 2016 and offers all of the information available to AQU Catalunya on all accreditation procedures, programme by programme, together with all data and figures from the different surveys that it coordinates).

There is no case in the external review report of any negative evidence to justify a change in the assessment of 2012 of full compliance to that of substantially compliant in 2017.





## **In Standard 2.2. Designing methodologies fit for purpose.**

As was the case with Standard 3.1., on the one hand, in the analysis of the standard remarks were added that did not appear in the draft report, such as: *“Nevertheless, in the view of the review panel, AQU Catalunya should develop a clear vision on the consequences of its ambition to move towards self-accrediting institutions and more institutional autonomy. In the view of the panel the current combination of procedures does not in itself lead to more institutional autonomy. Therefore, the panel is convinced that the agency should develop a clear view on whether all current procedures fit within its overall vision.”* The assessment of this standard would also appear to be linked to certain contextual aspects that are beyond the control of AQU Catalunya, as in the first paragraph of the analysis section and in institutional accreditation (second paragraph) which, as mentioned above, is a process that is in a very early stage and is still not operational due to it depending on Spanish regulations that are pending parliamentary approval.

The point being made by the Agency is the same as in standard 3.1.: it is unacceptable for aspects to have been included that we have been unable to appeal, and for the standard to be conditioned by opinions and/or projects that have still not been implemented and that cannot be undertaken in the current regulatory framework as this would imply the assessment of procedures and aspects that the Agency has only just started to roll out and implement.

Secondly, in the analysis it is acknowledged that *“The agency has put much effort into creating a unique structure for the suite of guides for the different evaluations procedures.”* It then goes on to say that *“Nevertheless, the panel noticed that there is still quite some diversity in the structure and content of the different assessment frameworks. Similar aspects are tackled, but often in a slightly different way.”* A minor aspect such as this, which does not compromise the standard, should clearly not condition its assessment.

In addition, the Agency considers that the recommendation that *“the agency develops a clear vision on how the external quality System in Catalonia should be designed in order to make it even more fit for purpose”* should not be anything more than an enhancement proposal or reflection to be taken into account. In any case, there is no evidence in the report to suggest that the methodologies used are not fit for purpose. Again, it is difficult to understand why in this case there has been a drop in the level of compliance.



#### **In Standard 2.4. Peer-review experts.**

In this standard a new remark was added that is not in the draft report and which also appears to condition the final assessment, which is *“Table 3 shows a strong presence of experts from other Spain regions. This contributes to the independence of the panels. As the approach to higher education is relatively similar in the different Spanish regions, the experts from other Spanish regions should no be considered equivalent to International experts”*. AQU Catalunya has not had the opportunity to clarify this remark and I also wouldn't want you to interpret this as meaning that the intention of AQU was to consider experts from Spain in the same light as international experts. Nevertheless, the Agency does believe it important to point out the idiosyncrasy that the main pool of Spanish speakers is Spain and so it therefore makes sense that most experts come from this geographical area. The panel does however recognise that *“Since the previous ENQA peer review, the agency has worked hard to increase the number of academic experts from outside the Catalan higher education System”*. The Agency therefore did fulfil its commitment and did comply with the requirement.

That said, the report goes on to say that *“the number of International experts remains quite low”* and that *“it would be useful to define a target level of international participation in the different review procedures. Especially in the case of PhD programmes...”*. AQU Catalunya's reply to that is that all calls for international reviewers have been filled. And as is explained in point 7 of the supporting arguments *“AQU Catalunya has the ambition to continue to increase the experts from outside Spain when the purpose of the evaluation recommends it, as for example the assessment of the doctoral degree programmes”*.

In this regard we consider that it is the positive efforts made by the Agency that should be assessed, and admittedly greater efforts can be made. Nevertheless, we believe that making the assessment of the standard conditional upon an enhancement proposal, which then became a requirement, and an accreditation programme (PhD) that will be implemented in 2018 to be a highly restrictive assessment, especially when there is no required minimum number of international experts according to the standards. Neither is there any mention made by the panel of a deterioration in this regard, quite the opposite, in fact. A distinction clearly needs to be made between what is set out in the guidelines and good practices, and what justifies compliance with the standard.

The other aspect that would appear to have negatively impacted the assessment of the standard is the training of experts. *“The panel, however, did not find evidence for a strong emphasis on the new reasoning behind the new ESG in the training provided to peer review experts. Indeed, the panel understood that some of the more experienced panel members did not participate recently in a training. In this way they might have missed the new elements which have been introduced upon the alignment of the procedures within the 2015 ESG”*.



The first consideration is that the ESG are from May 2015, while the training of experts for accreditation procedures under the new VSMA framework (the Agency's framework for quality assurance and review) dates from 2014. In 2014 4 sessions were organised, 13 in 2015 and 11 in 2016<sup>1</sup>. All experts, without exception, who participate in an external review are trained by AQU Catalunya. As stated in the self-assessment report (p.89) *"The training session has the same structure for all the QA processes: the presentation (contextualization) of the project, the procedure of evaluation, the methodology, and, if it is necessary, some practical case studies. The training session takes from 3 hours (ex-post IQAs certification, teaching assessment handbooks, the quality assurance of research at Department level, international quality assurance and quality assurance of foreign institutions offering degrees in Catalonia) to 5 hours (programme level external reviews in Catalonia)."* The aim of AQU Catalunya, as set out in the standards, is to ensure that experts *"have appropriate skills and are competent to perform their task"* and not *"place a strong emphasis on the new reasoning behind the new ESG"*. Experts working with the Agency do however apply the current ESG as they form part of the review methodologies and as such they do have appropriate skills and are competent to perform their tasks. More focus should have been placed instead on *"The panel members the review panel interviewed are positive about the training and guidance they received from AQU Catalunya"*, and under no circumstance was there any complaint from the reviewees about the level of training of the experts.

Lastly, one other aspect that appears to have conditioned the assessment of the standard regarding the use of international experts is the use of Catalan in reviews: *"A first issue is the use of Catalan in a limited number of procedures. Although the panel fully respects the choice to carry out some assessments in Catalan, this choice inherently reduces the possibilities to involve International experts"*. As requested in the supporting arguments process for the draft report, it was explicitly requested that the fact that language has never been a barrier in external reviews be taken into account and if this was to appear in the final report that it should also be stated that the Agency has always been flexible in QA procedures as regards respect for the use of the most convenient language, in agreement with the institution being reviewed.

In any case, in the overall analysis, it is obvious that AQU Catalunya fully complies with the standard. The report sets out various enhancement proposals, which then become requirements that ultimately influenced the final assessment, which would appear to be highly disproportionate to the Agency's overall application of the standard which, as described in the report, is fully satisfactory, both for AQU Catalunya, the experts and the units being reviewed.

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<sup>1</sup> Figures from AQU Catalunya's Annual Reports.



It should be noted that there is no evidence at all evidence of less involvement by AQU Catalunya in internationalisation, nor can it be said that the Agency has disregarded the training of experts.

### In Standard 2.6. Reporting.

There would appear to be two aspects that influenced the assessment of this standard. The first is the non-publication of unfavourable reports in the ex-ante accreditation (validation) of programmes, while the second is the facilitation of available information in a more integrated way.

In relation to the first issue, the panel added a paragraph to the report that was not included in the draft reviewed by AQU that shows the panel's opinion about something, which we disagree with. "Indeed, this ESG Standard **clearly requires the publication of all reports** in order to fully comply with the ESG". With regard to this matter, AQU Catalunya notes that ESG guideline 2.6. states: "The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution". Reports should be used as the basis for implementing corrective actions and enhancement measures. As explained in the self-assessment report, if as a result of a validation procedure ex-ante accreditation is withheld, a programme cannot be offered and there will therefore be no follow-up or monitoring of the programme by the institution. It is the Agency's opinion that it is irrelevant to provide information to society on a course that will never exist. On the contrary, the publishing of a report on a programme that will never be introduced would be very confusing for society. In short, in order to comply with the standard and not cause confusion in society, such reports should basically never be published (not vice versa).

We also believe that the assessment of the standard was insensitive to a contextual understanding of the situation here, compared to other countries. One should also bear in mind that ex-ante accreditation is uncommon in Europe, and the review of the agency should not be impacted by an additional quality assurance process that most other agencies do not implement.

At the same time, insufficient consideration was given to the fact that all other reports produced by the Agency have been published, that *"The panel commends the agency for its consistent focus on substantiating the assessment outcomes, as well as on good practices and recommendations for improvement"* and that *"The agency implemented the recommendation of the 2012 ENQA review in order to make reports and their conclusions as comprehensive as possible for non-experts"*. What prevails here is an anecdote that has no impact on the quality



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del Sistema Universitari  
de Catalunya

of the study programmes being offered to society, in terms of the Agency's overall performance in all QA processes.

As regards the second matter, insufficient attention was also paid to AQU Catalunya's launching and implementation of the EUC platform (<http://estudis.aqu.cat>), which provides access to information for all stakeholder groups. The platform provides direct access to all site visit reports and the Agency's decisions, as laid down by the standard, along with further interesting information for stakeholders. In addition, all quantitative and qualitative information is made available in three different language and is easily comparable. The portal has received over 100,000 visits in the twelve months that it has been operational. This is possibly one of the most robust and efficient information systems available to stakeholders in higher education in Europe, which has been widely acclaimed by other QA agencies. It is surprising that, given the impact of the platform, the Agency was not considered to be fully compliant with this standard.