

Approval of the Application
by Aragon Agency for Quality Assurance and Strategic Foresight in
Higher Education (ACPUA)
for Inclusion on the Register

Register Committee

Ref. RC18/2016

Ver. 1.0

Date 3/12/2016

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Application of:	14/9/2015
External review report of:	August 2016
Review coordinated by:	ENQA
Review panel members:	Fiona Crozier (chair), Pedro Nuno Teixeira (academic), Inguna Zarina (student) Pieter-Jan Van de Velde
Decision of:	3 December 2016
Registration until:	31 August 2021
Absented themselves from decision-making:	
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 2/10/2015 2. External review report, August 2016 3. Request to the review panel 4/11/2016 4. Clarification by the review panel, 20/11/2016

1. The application of the Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2/10/2015.
3. The Register Committee considered the external review report of August 2016 on the compliance of ACPUA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought (letter of 4/11/2016) and received clarification from the chair of the review panel (letter of 20/11/2016).

Analysis:

5. In considering ACPUA's compliance with the ESG, the Register Committee only took into account:
 - *Study programme initial accreditation.*

- *Study programme accreditation.*
 - *Study programme follow up.*
 - *Training schools accreditation.*
 - *Higher education institutions initial accreditation.*
 - *Teaching activity evaluation system audit (DOCENTIA Programme).*
 - *Teaching staff evaluation system audit.*
 - *Partner HEI evaluation.*
6. In the eligibility verification (of 2/10/2015) the Register Committee could not determine whether '*university research institutes accreditation and initial accreditation*' and '*consultancy: support to decision-making process*' (*Authorization Reports in ACPUA's self-evaluation report*) are activities within the scope of the ESG. As this was not clarified in the review report the rapporteurs asked the panel for further clarifications.
 7. In its response letter (of 20/11/2016) the panel clarified that the mentioned activities are only of indirect relevance for compliance with the ESG.
 8. The Register Committee concluded that "*university research institutes accreditation and initial accreditation*" do not fall within the scope of the ESG and that the preparation of Authorization Reports is limited to a supportive task which does not include a review process per se and therefore it is not pertinent to ACPUA's registration.
 9. The panel further explained that there are no students involved in the ACPUA's Research Evaluation Committee. Since research accreditation activities are not an activity within the scope of the ESG the Register Committee concluded that the requirement of including students in peer reviews does not apply in this case.
 10. The following activities are not within the scope of the ESG and, thus, not pertinent to the application for inclusion on the Register:
 - *Junior academic staff research evaluations.*
 - *Strategic foresight studies/reports.*
 - *ACPUA Quality Seminars.*
 - *Research projects evaluation.*
 11. The Register Committee found that the report provides sufficient evidence and analysis on ACPUA's level of compliance with the ESG.
 12. The Register Committee concurred with the review panel's analysis and conclusions regarding the individual European Standards and Guidelines, unless otherwise noted in the following specific comments:

ESG 2.1: Considerations of Internal Quality Assurance

13. The Register Committee considered the panel's analysis on how standards 1.1 – 1.10 are addressed within the different types of programme evaluations and within ACPUA's institutional reviews.
14. Given that the standards relating to *design and approval of programmes (1.2), student-centred learning, teaching and assessment (1.3), student admission, progression, recognition, certification (1.4) and ongoing monitoring and periodic review of programmes (1.9)* do not seem to be considered in ACPUA's institutional-level activities (according to the table on alignment with the ESG) the Register Committee asked the panel (letter of 04/11/2016) to confirm whether they are in fact addressed within ACPUA's programme accreditation procedures.
15. In its response (letter of 20/11/2016) the Chair of the panel confirmed that the programme accreditation procedures (ex-ante accreditation, follow-up and ex-post accreditation) touch upon all standards of Part 1. As the review took place soon after the publication of the new ESG, the panel could not sufficiently well verify the focus on the new issues brought by ESG 2015, i.e. ESG 1.3 student-centred learning has not been explicitly stated in ACPUA's evaluation criteria but the panel found there is significant ongoing discussion on how to best approach its inclusion.
16. The Register Committee noted that although ACPUA performs several types of reviews in collaboration with ANECA or with other regional quality assurance agencies (i.e. DOCENTIA, AUDIT reviews) and thus it might not be in the position to modify the criteria and processes, **the agency retains full responsibility for how it addresses Part 1 of the ESG in its own procedures** that are carried out autonomously irrespective of whether such procedures are voluntary or obligatory in their nature.
17. **Having considered the clarifications of the review panel, the Register Committee concluded that ACPUA complies with ESG 2.1.**

ESG 3.3: Independence

18. The Register Committee noted that the Board of the agency is chaired by the regional minister who is also responsible for the appointment of the Director of the organisation (following consultation with the Board of Directors).

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19. Referring to the independence of the Board the panel stated that while the Minister is the chair of this decision-making body there was no evidence of any political interference over the agency's activities (Review Report, p.18). The Register Committee was unclear on the evidence supporting the conclusion of the panel and has therefore asked the panel to elaborate on the policies and processes which the panel considered to satisfy itself of the Board's independence.
20. In its clarification response (of 20/11/2016) the panel stated that the code of ethics extends also to the Board members, but that there were no specific mentions on this during the site visit. The panel satisfied itself on the separation of roles between the Board and technical committees and commented that it has been a positive step to guarantee the independence of the agency's activities. The members of the technical committees interviewed by the panel reported that they had no political interference in their work.
21. **Having considered the additional clarifications provided by the panel the Register Committee was able to conclude on compliance with ESG 3.3.**

ESG 3.4: Thematic Analysis

22. The panel stated that ACPUA has focused on thematic reports during its first year of existence, however the constraints on human and financial resources have hindered the agency's activity in this area in recent years.
23. Considering the increased number of external quality assurance activities carried out by ACPUA in recent years, the Register Committee underlined the panel's recommendation to allocate sufficient resources to the activities supporting thematic analysis and ensure their implementation in a more systematic way.
24. **Considering the lack of a systematic approach in developing thematic analysis, the Register Committee was not able to concur with the panel's conclusion on compliance and formed the view that ACPUA only partially complies with ESG 3.4**

ESG 3.5: Resources

25. The Register Committee noted that ACPUA's main funding source comes from the regional government. The panel stated that the agency is considering possibilities to diversify its funding revenues and therefore reduce its financial dependence from the Ministry.

26. While the panel commended the agency on the way it has dealt with its tasks considering its limited human and financial resources, it also expressed concerns regarding the agency’s ability to further sustain these efforts and ensure effectiveness in meeting its strategic goals.

27. **Considering the financial dependence on the Ministry, the increased number of external quality assurance activities carried out by ACPUA and the limited resources to support its activities the Register Committee was unable to concur with the view of the panel of (substantially) compliant and concluded that ACPUA only partially complies with ESG 3.5.**

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Conclusion:

28. Based on the external review report and the considerations above, the Register Committee concluded that ACPUA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantially compliant	Compliance
2.2	Substantially compliant	Compliance
2.3	Fully compliant	Compliance
2.4	Substantially compliant	Compliance
2.5	Fully compliant	Compliance
2.6	Substantially compliant	Compliance
2.7	Substantially compliant	Compliance
3.1	Substantially compliant	Compliance
3.2	Fully compliant	Compliance
3.3	Fully compliant	Compliance
3.4	Substantially compliant	Partial compliance
3.5	Substantially compliant	Partial compliant
3.6	Substantially compliant	Compliance
3.7	Irrelevant	Compliance (by virtue of applying)

29. **The Register Committee considered that ACPUA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that ACPUA complies substantially with the ESG as a whole.**

30. The Register Committee therefore approved the application for inclusion on the Register. ACPUA's inclusion shall be valid until 31/08/2021¹.

31. The Register Committee further underlined that ACPUA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

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¹ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.



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Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA)

Ms Irene Melchor

Avda. de Ranillas nº 5 D, 1ª Planta

50018 Zaragoza

Spain

Brussels, 2 October 2015

Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A28 of 14/09/2015

Dear Irene,

We hereby confirm that the application by ACPUA for inclusion on the Register is eligible. Based on the information and draft terms of reference provided, the external review coordinated by ENQA fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of ACPUA are within the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015):

We confirm that the following activities of ACPUA are within the scope of the ESG:

- **Study programme initial accreditation ***
- **Study programme accreditation**
- **Study programme follow up**
- **Training schools accreditation**
- **Higher education institutions initial accreditation ***
- **Teaching activity evaluation system audit (DOCENTIA Programme)**
- **Teaching staff evaluation system audit**
- **Partner HEI evaluation**

The following activities of ACPUA are within the scope of the ESG if the research institutes have a role in study programmes (including at doctorate level) or activities concerning the learning environment or the link between education and research:

- **University research institutes initial accreditation**

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EQAR Founding Members:



- **University research institutes accreditation**

Since this cannot be determined based on the information available to date, these activities should be considered in the external review of ACPUA so as to enable the Register Committee to determine whether or not these activities are within the scope of the ESG.

In the application form, ACPUA stated that it did not consider the activity “**Consultancy: support to decision making process**” to be within the scope of the ESG.

We considered the information available and came to the conclusion that this activity might be within the scope of the ESG, as far as it includes reviews or assessments of existing or prospective higher education institutions, organisational units or study programmes (e.g. pre-authorization reports as described on ACPUA's website).

Even if such reviews or assessments result in a report to the education authority and not in a decision by ACPUA itself, such reviews or assessments are within the scope of the ESG if they deal with learning and teaching in higher education, including the learning environment and relevant links to research and innovation.

These activities should thus be analysed in the external review of ACPUA.

Please ensure that ACPUA's self-evaluation report covers all the aforementioned activities.

We understand that the activities marked with an asterisk have not yet been implemented (or only in the field of arts for study programme initial accreditation). These activities should be addressed as far as they can, based on their stage of development at the time of ACPUA's review.

We confirm that the following activities are not EQA activities within the scope of the ESG:

- **Junior academic staff research activity evaluation**

Based on the information provided we understand that this is an evaluation of individual academic staff directly by ACPUA, and therefore not an activity within the scope of the ESG. This is notwithstanding the fact that evaluations by ACPUA of institutions' systems for evaluating their staff (such as listed above) are within the scope of the ESG.

- **Strategic foresight studies/reports**

- **ACPUA Quality Seminars**

- **Research projects evaluation**

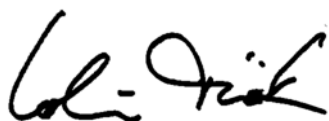
The organisation of seminars and the publication of studies and reports may, however, be relevant to ACPUA's compliance with certain standards.

To that extent, these activities should be addressed in ACPUA's self-evaluation and the external review of ACPUA.

We kindly ask you to forward this letter to ENQA as the coordinator of the external review and request that ENQA inform the review panel, so as to ensure that all these activities are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ACPUA has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück
(Director)

Cc: ENQA (review coordinator)

Brussels, 4 November 2016

Application by ACPUA for inclusion on EQAR

Dear Fiona,

Aragon's Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) has made an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 15 June 2016 on which ACPUA's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members, some matters in order to contribute to the consideration of ACPUA's application:

1. **ESG 2.1:** The panel stated that ACPUA's institutional-level external quality assurance activities focus on the institutions' policy for quality assurance (1.1), teaching staff (1.5), learning resources and student support (1.6), information management (1.7), and public information (1.8) (Review report, p. 25).

The panel further noted that for programme accreditation the 'extent to which those topics [Part 1 of the ESG] are evaluated differs' (Review report, p. 25).

Given that the standards relating to design and approval of programmes (1.2), student-centred learning, teaching and assessment (1.3), student admission, progression, recognition, certification (1.4) and ongoing monitoring and periodic review of programmes (1.9) do not seem to be considered in ACPUA's institutional-level activities, could you please confirm whether these are sufficiently addressed within ACPUA's programme accreditation procedures?

2. In the eligibility verification (see letter to ACPUA of 25 October 2015) the Register Committee could not determine whether

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'university research institutes accreditation and initial accreditation' and *'consultancy: support to decision making process'* (Authorization Reports in ACPUA's self-evaluation report) are activities within the scope of the ESG.

Could you please clarify if the panel has formed a view as to whether these activities are within the scope of the ESG or not?

Furthermore could you please indicate whether the panel's analysis of ACPUA's compliance with Part 2 of the ESG also extends to Authorization Reports?

3. **ESG 2.4:** The panel noted that the agency does not involve students in case of *'research evaluations'*, but that the report is finalised by a Technical Committee that includes a student (Review Report, p. 34).

The panel also described the composition of the Research Evaluation Committee (Review Report, p. 10), which does not mention a student in the composition of this body.

Could you please clarify whether or not students are involved in that committee?

4. **ESG 3.3:** Referring to the independence of the Board the panel noted that while the Minister is the chair of this decision making body there was no evidence of any political interference over the agency's activities (Review Report, p.18).

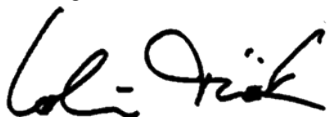
Could you please elaborate on the policies and processes which the panel considered to satisfy itself of the Board's independence? For instance, does the code of ethics also extend to members of the Board and technical committees of ACPUA?

We be would grateful if it was possible for you to **respond by 18 November 2016**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ACPUA's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,



Colin Tück
(Director)

Cc: Pedro Teixeira
ENQA
ACPUA

Response from Chair of the review panel of ACPUA

1. ESG 2.1: The panel stated that ACPUA's institutional-level external quality assurance activities focus on the institutions' policy for quality assurance (1.1), teaching staff (1.5), learning resources and student support (1.6), information management (1.7), and public information (1.8) (Review report, p. 25).

The panel further noted that for programme accreditation the 'extent to which those topics [Part 1 of the ESG] are evaluated differs' (Review report, p. 25).

Given that the standards relating to design and approval of programmes (1.2), student-centred learning, teaching and assessment (1.3), student admission, progression, recognition, certification (1.4) and ongoing monitoring and periodic review of programmes (1.9) do not seem to be considered in ACPUA's institutional-level activities, could you please confirm whether these are sufficiently addressed within ACPUA's programme accreditation procedures?

The programme accreditation procedures (ex-ante accreditation, follow-up and ex-post accreditation) do touch upon all standards of Part 1.

- The ex-ante accreditation is designed specifically to check the design and to approve new programmes. Also in the ex-post accreditation those procedures are discussed.
- One of the core topics of the programme accreditation procedures is the quality of the provision of teaching and assessment. Although student-centred learning is not stated explicitly in the evaluation criteria ACPUA uses in its procedures, the management and staff assured that student-centred learning is looked at during its assessments. As the review took place soon after the publication of the new ESG, no reports were present yet to verify this strengthened focus on student-centred learning. It should also be noted that the topic itself is accepted as one of the 'new' additions to the ESG; there is significant ongoing discussion as to how agencies might best approach its inclusion in their processes (e.g. the NOQA seminar in August 2016).

2. In the eligibility verification (see letter to ACPUA of 25 October 2015) the Register Committee could not determine whether 'university research institutes accreditation and initial accreditation' and 'consultancy: support to decision making process' (Authorization Reports in ACPUA's self-evaluation report) are activities within the scope of the ESG. Could you please clarify if the panel has formed a view as to whether these activities are within the scope of the ESG or not?

Furthermore could you please indicate whether the panel's analysis of ACPUA's compliance with Part 2 of the ESG also extends to Authorization Reports?

The panel can confirm that these activities are only of indirect relevance for compliance with the ESG. Quality assurance of research education contributes to the quality of research; it also features in the quality assurance of teaching staff (pg 22). The quality of education based on this research benefits also indirectly from those quality assurance activities. The 'consultancy activities' mentioned only include a supportive process, rather than a substantive quality assurance activity. Therefore, the panel only considered these activities in order to get a clear view on the functioning of the agency as a whole, and did not take them into account in order to evaluate individual standards.

3. ESG 2.4: The panel noted that the agency does not involve students in case of 'research evaluations', but that the report is finalised by a Technical Committee that includes a student (Review Report, p. 34).

The panel also described the composition of the Research Evaluation Committee (Review Report, p. 10), which does not mention a student in the composition of this body. Could you please clarify whether or not students are involved in that committee?

No student is involved in the Research Evaluation Committee. As stated above, the panel considers the research evaluation activities as only being of indirect relevance to the compliance with the European Standard and Guidelines. This was stated in the report:

“All evaluations are implemented by groups of external experts, and the Agency has changed its policy to include a student in all panels, especially in program and institutional reviews, in which students are equal partners as the other panel members. Exceptions to this approach are research evaluations and evaluation of junior teaching staff performance.” (pg 34)

4. ESG 3.3: Referring to the independence of the Board the panel noted that while the Minister is the chair of this decision making body there was no evidence of any political interference over the agency’s activities (Review Report, p.18). Could you please elaborate on the policies and processes which the panel considered to satisfy itself of the Board’s independence? For instance, does the code of ethics also extend to members of the Board and technical committees of ACPUA?

In the ethics code ACPUA states “*ACPUA exige a todos sus miembros y colaboradores el desempeño de sus funciones según los más elevados estándares éticos establecidos en este documento y en la normativa vigente, así como los niveles más altos de independencia, equidad, profesionalidad e integridad.*” This suggests that it extends also to Board members, but no specific mention has been made on this during the site visit. Members of technical committees indeed do sign the code of ethics. However, the panel based its assessment more on the discussion it had with Board members, members of the technical committees and staff. All people involved indicated explicitly that the separation of roles between the Board and technical committees has been a large step forward in order to fully guarantee the independence of the activities of the agency. Members of the technical committees reported that they feel no political interference at all.

In addition:

- Legal statements on the operational independence of the Agency refer to this matter;
- Public documents emphasise the transparency and public accountability of the Agency;
- There is separation between Board and the Technical Committees and panels (this division of labour encourages consistency and a significant degree of consensus);
- Committees include experts from outside Aragón;
- The code of ethics is said to apply to all members and collaborators of ACPUA.