Subject: Membership of CYQAA in ENQA

Dear Professor Koutselini,

I am pleased to inform you that, at its meeting of 21 February 2019, the Board of ENQA took the decision to grant the CYQAA membership of ENQA for five years from that date. The Board concluded that CYQAA is in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and thus fulfil the membership criteria according to article 6, paragraph 1 of ENQA’s rules of procedure.

At the same time, the Board marks down several critical points concerning the review. Firstly, in relation to standard 3.1 on activities, policy and processes for quality assurance, the Board expects CYQAA to closely follow the recommendations of the review panel. Of utmost importance is the development of a clear and detailed strategic plan that will guide effectively the agency’s activities towards the aims set.

The Board also seconds the critical remarks of the panel on standard 3.3 Independence, where the panel recommends CYQAA to become fully separated from the Ministry of Education and Culture in organisational terms, including the staff recruitment process and financial services. The Board raised additional concerns about the unclear selection criteria for the appointment of students and professionals into the pool of experts and the imprecise procedure/methodology for the appointment and dismissal of the Council members. For these reasons, in the Board’s view, this particular standard is considered as partly compliant and not substantially compliant, as judged by the panel.

Furthermore, the Board urges the agency to give more attention to ESG standard 3.4 Thematic analysis and introduce the practice of analysing systematically the material collected in the agency’s external quality assurance activities and publish regularly the findings. Nevertheless, in the Board’s view, the panel was over strict in judging the agency as non-compliant on this standard. Having in mind the agency’s first review against the ESG, and the existing plan and resources allocated to publish the agency’s first thematic analysis in 2019, the Board considers the standard 2.4 as partially compliant.
The Board would also like to use this opportunity to provide an articulation regarding standard 2.7 Complaints and appeals, where their judgement differs from that of the panel. The Board was especially concerned about the lack of transparency when considering appeals against the agency’s accreditation decisions, and urged for a separate committee of experts to be established for this purpose. Furthermore, all formal decisions of the agency should be amenable to appeal, and the agency should develop and publish a clearly defined-complaints procedure. Therefore, in the opinion of the Board, the standard 2.7 is considered as partially compliant.

The Board calls upon the agency to seriously consider the recommendations in the panel’s report and take immediate action to address them. Due to the several critical points made in this letter, the Board expects a follow-up report to be received within one year of its decision, i.e. by February 2020. The follow-up report should include an update on the status of legislation in regard to the points risen on standards 2.7 and 3.3, and provide a copy of the first thematic analysis. In addition, the follow-up report should provide an update on the procedure for audits, and include the Ministry response on whether any legal changes have been made so that the composition of the evaluation panels permits the inclusion of practitioners in evaluations of all programmes rather than only those for regulated professions.

The Board also encourages CYQAA to take advantage of the voluntary progress visit – a new enhancement-led feature in the review process. The visit would take place in about two years’ time from this decision. The ENQA Secretariat will be in touch with you in about a year’s time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the Guidelines for ENQA Agency Reviews. If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Please accept my congratulations for the confirmation of membership of CYQAA.

Yours sincerely,

Christoph Grolimund
President

Annex: Areas for development
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As outlined by the review panel, CYQAA is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

ESG 3.1 Activities, policy and processes for quality assurance
CYQAA is recommended to revise its mission statement to incorporate its compliance-assurance aim alongside that of supporting quality improvement in higher education; and devise a detailed two-year activity plan to guide effectively its activities towards the aims set.

ESG 3.3 Official status
CYQAA is recommended to discuss with its stakeholders how the procedure for the appointment and dismissal of the Council can be amended so that it is not perceived as providing space for interference of the national authorities; be fully separated from the Ministry of Education and Culture in organisational terms, including the staff recruitment process and financial services.

ESG 3.4 Thematic analysis
CYQAA is recommended to introduce the practice of analysing systematically the material collected in its external quality assurance activities and publishing regularly its findings to provide inputs to national policies, support institutions in the development of internal quality assurance and aid its own reflection on its external quality assurance processes.

ESG 3.6 Internal quality assurance and professional conduct
CYQAA is recommended to rely increasingly on formal rather than informal mechanisms for feedback collection and improve its current mechanism for collecting feedback after each evaluation (a response submitted by each institution) so that institutions are explicitly requested to provide feedback and do so in a structured way.

ESG 2.1 Consideration of internal quality assurance
CYQAA is recommended to incorporate into its standards the few aspects of Part 1 of the ESG, including external stakeholder involvement, which are currently not or not explicitly addressed; and gradually shift the focus in its processes after the first accreditation cycle from controlling institutions to supporting them in carrying their responsibility for quality and in quality improvement, with due consideration to be given to the effectiveness of internal quality assurance.

ESG 2.3 Implementing processes
CYQAA is recommended to expand the focus of the follow-up stage in its evaluations to embrace not only control-oriented measures but also support for quality improvement; give more consideration to the specificity of joint programmes in its briefings for experts to ensure
full consistency in conducting evaluations; and take steps to include a site visit and a follow-up in the assessment of conditions for the provision of cross-border education by foreign HEIs.

**ESG 2.4 Peer-review experts**
CYQAA is recommended to publish the selection procedure and criteria for all categories of experts on its website; provide additional training to students to prepare them to contribute to all relevant evaluation areas, including student involvement in internal quality assurance and student-centred learning.

**ESG 2.5 Criteria for outcomes**
CYQAA is recommended to develop more detailed and written guidelines for experts to ensure greater consistency in scoring; state more explicitly in its decision-making procedure whether accreditation can be granted in any case where an HEI has not fully implemented a minor recommendation made in an external evaluation report.

**ESG 2.6 Reporting**
CYQAA is recommended to put in place a mechanism to ensure that all external evaluation reports are of comparably high quality in terms of evidence to substantiate scores, comments being specific and consistency between scores and comments, and give due consideration to the effectiveness of internal quality assurance; provide space in the evaluation report template to address the specificity of joint programmes; introduce an annex to an external evaluation report for experts to comment on the implementation of recommendations by institutions, and to be published together with a report; and publish all reports, including those leading to refusal of accreditation, in addition to those currently available on its website.

**ESG 2.7 Complaints and appeals**
CYQAA is recommended to establish a separate committee of experts for considering appeals against its accreditation decisions to ensure full transparency (as proposed in the amendments to the legislation already drafted); include the possibility of appealing against its decisions in the procedure for the assessment of conditions for the provision of cross-border education by foreign HEIs; and integrate current practices into a clearly defined complaints procedure.