

ENQA AGENCY REVIEW

AGENCY FOR SCIENTIFIC AND UNIVERSITY QUALITY OF ANDALUSIA (ACCUA)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Agency for Scientific and University Quality of Andalusia (ACCUA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG 2015). It is based on an ENQA external review, following the methodology described in the *Guidelines for ENQA Agency Reviews* and considering the EQAR Register Committee's *Use and Interpretation of the ESG*. The review was undertaken as part of ACCUA's application for the renewal of its ENQA membership and its registration on EQAR. It was conducted between December 2023 and September 2024. The site visit to the agency in Cordoba, Spain, took place between 24 and 26 April 2024.

ACCUA is the quality assurance agency of the Autonomous Community of Andalusia and one of eleven agencies in Spain. It was created in December 2021 as the legal successor of the Andalusian Agency of Knowledge, Department of Evaluation and Accreditation (AAC-DEVA), and formally established in March 2023. The agency has been an ENQA member since 2000 and has been included in EQAR since 2009.

In its mission, ACCUA aims “to promote the quality of the Andalusian Knowledge System, in accordance with international scientific and academic standards, and to provide the Universities, Higher Education Institutions, Research Institutions and other Agents of the Andalusian Knowledge System with the quality criteria and references that allow them to fulfil their social function in the best possible way”. It pursues its mission through external quality assurance activities that cover both higher education and research and are conducted at the levels of teaching staff, programme, university unit and entire university. This report addresses the following activities that fall within the scope of the ESG: programme evaluations or accreditation reviews, including verification, modification, follow-up and accreditation renewal, and evaluations of international joint programmes; reviews of universities for recognition; accreditation of internal quality assurance systems (IMPLANTA); institutional accreditation; teaching activity evaluation (DOCENTIA); and accreditation of foreign language skills.

Although it formally started operating in March 2023, the agency was undergoing transition from AAC-DEVA to ACCUA throughout the last year, and its Director was appointed, and its strategic plan approved, at the end of the year. The strategic plan and the 2024 Annual Action Plan set clear directions for the development of the agency itself and its external quality assurance activities. At the time of the panel's site visit, ACCUA was at an early stage in the implementation of the planned activities and had yet to deliver concrete results. However, as the panel found during the visit, in carrying forward its plans, the agency can rely on the trust it has gained among its stakeholders over the years, the commitment of its Director and its experienced staff, and a strong sense of optimism created among the stakeholders by its establishment in a new legal framework and widespread support for the course it is taking.

The new legal framework has allowed the agency to establish an organisational structure which, unlike AAC-DEVA's, does not place any constraints on its strategic planning, governance or management, and to involve a wider range of external stakeholders in its governance and activities. As the rules for the appointment of its governing and executive bodies and its operational arrangements have remained essentially the same as those for its predecessor, the agency continues to be independent in its activities, even though some limitations are placed by the national and regional legislation. It also continues to be fully funded by the Regional Government, with a budget which is sufficient for its ongoing and planned activities and with good prospects for financial stability.

The two areas of the agency's activities where the panels conducting the two previous reviews expected to see greater or faster progress towards compliance with the ESG standards were thematic analysis and internal quality assurance. The transition from AAC-DEVA to ACCUA slowed down the process of building an internal quality assurance system. However, some elements are now well-established

and new ones have been put in place since the previous review, key documents integrating all quality management processes were being updated for ACCUA at the time of this panel's visit, and some gaps identified by the panel have yet to be bridged. Although much effort has gone into several studies that have been published since the previous review, thematic analysis is still a challenging standard for the agency, and in moving forward, it would need to make greater use of the material gathered in its external quality assurance activities rather than compiling and analysing data from external sources.

ACCUA's external quality assurance activities comply with the ESG standards, even if improvements could still be made in some areas, as the panel noted in its specific comments in this report. Despite the difficult transition period, ACCUA carried on with its quality assurance activities without any disruptions. Although the agency has introduced several new external evaluation processes since the previous review, its procedures are well-established and are regularly reviewed and improved in partnership with the stakeholders. The agency has sought over the years to streamline its evaluation procedures and ease the burden on universities within the limits set by the national legislation, but the national requirements for programme accreditation are demanding for universities in terms of the time and resources to be invested in compiling data and reporting. Therefore, ACCUA and universities are now jointly shifting their focus towards institutional accreditation, and the agency has initiated activities to support universities in moving away from programme accreditation, which are welcome by universities.

The panel found the agency to be compliant with ESG 3.1 (Activities, policy and processes for quality assurance), 3.2 (Official status), 3.3 (Independence), 3.5 (Resources), 3.6 (Internal quality assurance and professional conduct), 3.7 (Cyclical external review of agencies), and 2.1 (Consideration of internal quality assurance), 2.2 (Designing methodologies fit for purpose), 2.3 (Implementing processes), 2.4 (Peer-review experts), 2.5 (Criteria for outcomes), 2.6 (Reporting) and 2.7 (Complaints and appeals); and partially compliant with ESG 3.4 (Thematic analysis). In conclusion, the panel believes that ACCUA is in compliance with the ESG.

INTRODUCTION

This report analyses the compliance of the Agency for Scientific and University Quality of Andalusia (*Agencia para la Calidad Científica y Universitaria de Andalucía*), ACCUA, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted between December 2023 and September 2024. The review was carried out as part of ACCUA's application for the renewal of its ENQA membership and its registration in EQAR.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for initial registration and such registration must be renewed every five years.

As the legal successor of the Andalusian Agency of Knowledge, Department of Evaluation and Accreditation (AAC-DEVA), ACCUA has been an ENQA member since 2000 (with the status of full member granted in 2009 following its first ESG-based external review) and has been registered in EQAR since 2009.

As this is ACCUA's fourth review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

SCOPE OF THE REVIEW

The review report addresses the following external quality assurance (QA) activities of ACCUA (as listed in the Terms of Reference (ToR) for the review; see Annex 2):

1. Accreditation of foreign language skills
2. Accreditation of Quality Assurance Systems
3. DOCENTIA programme for teaching activity evaluation
4. European Approach for Quality Assurance of Joint Programmes
5. Ex-ante verification of study programmes
 - Substantial modification of study programmes
6. Ex-post re-accreditation verification of study programmes
7. Follow-up/monitoring of study programmes
8. Institutional accreditation
9. Modification of study programmes (non-substantial modifications)
 - Successive Academic Programmes (PARS)
10. Reviews of universities for recognition

In accordance with the ToR, the review panel paid particular attention to the following issues:

- organisational changes (ESG 3.1, ESG 3.2, ESG 3.3), including the structural changes of ACCUA compared to its predecessor AAC-DEVA;
- staffing and financial situation (ESG 3.5);

- strategic plan and procedures (ESG 3.1, ESG 2.2), including the development of ACCUA's strategic plan, and any possible substantial changes in the procedures of its predecessor.

MAIN FINDINGS OF THE 2019 REVIEW

The 2019 review panel found AAC-DEVA to be fully compliant with ESG 3.2 (Official status), 3.3 (Independence), 3.7 (Cyclical external reviews), 2.1 (Consideration of internal QA), 2.3 (Implementing processes), 2.4 (Peer-review experts), 2.5 (Criteria for outcomes) and 2.6 (Reporting); substantially compliant with ESG 3.4 (Thematic analysis), 3.5 (Resources), 3.6 (Internal QA and professional conduct), 2.2 (Designing methodologies fit for purpose) and 2.7 (Complaints and appeals); and partially compliant with ESG 3.1 (Activities, policy, processes for QA). The recommendations of the review panel are reproduced and addressed in the relevant ESG sections of this report.

In its 2019 decision on membership renewal for AAC-DEVA, the ENQA Board concurred with the review panel's judgments on ESG compliance and recommendations. In its 2020 registration renewal decision, the EQAR Register Committee considered that the agency was partially rather than substantially compliant with ESG 3.1, 3.6 and 2.6 and 2.7. It highlighted issues such as limited stakeholder engagement; lack of a strategic focus and governance-level oversight of strategic planning or review; a fully functional and effective internal QA system not yet being in place; non-publication of evaluation reports for one of the external QA processes; and the absence of a separate body to ensure impartiality in appeals processes, and of a formal procedure for handling complaints.

REVIEW PROCESS

The 2024 external review of ACCUA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of ACCUA was appointed by ENQA and composed of the following members:

- Luut Kroes (Chair, ENQA nominee), Managing Director, Accreditation Organisation of the Netherlands and Flanders (NVAO-NL), Netherlands;
- Ewa Kolanowska (Secretary, ENQA nominee), freelance consultant, Poland;
- Marisol Morales-Ladron (Academic, EUA nominee), Full Professor, University of Alcalá, Spain;
- Ann Gvritishvili (Student, ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool), PhD student in Economics, Ivane Javakhishvili Tbilisi State University, Georgia.

Alexis Fábregas Almirall, Project and Reviews Officer, acted as the review coordinator.

The panel received ACCUA's self-assessment report on 19 February 2024. It requested additional written clarifications on the agency's activities (e.g. budget, some evaluation procedures, statistics on appeals and complaints). On 19 March 2024, the ENQA coordinator held an online briefing for the panel to discuss the review process, with a representative of EQAR joining the briefing to discuss aspects of specific interest to the Register Committee. The panel had its first online kick-off meeting on 3 April 2024 and its second online kick-off meeting, combined with the clarification meeting with the agency on the national QA context and the agency's external QA activities, on 11 April 2024. The site visit was preceded by an onsite clarification meeting with the agency and a preparatory meeting of the panel on 23 April 2024. The visit to ACCUA, Cordoba, Spain, took place between 24 and 26 April 2024. Based on the evidence collected at the preparatory stage of the review and during the site visit, the panel produced a draft review report in May 2024. The draft was screened by the review coordinator in June 2024 and checked for factual accuracy by the agency in July 2024. The panel submitted its final review report to ENQA in July 2024.

The panel had access to all documents and most of the stakeholders it wished to consult during the review. It was unable to meet two Heads of Areas (middle-level managers of the agency; see the

section “ACCUA’s Organisation/Structure”) as they were not appointed yet, and two rectors of universities representing the Andalusian Council of Universities on the agency’s collective governing body as they were unavailable. All decisions of the panel were taken by consensus.

Self-assessment report

ACCUA set up a working group for self-evaluation, composed of a middle-level manager and staff involved in all core areas of its activity, who analysed the evidence collected since the previous external review. The working group presented the draft of the self-assessment report (SAR) to the agency’s governing and technical bodies and staff, universities, evaluators and students.

The SAR provided a list of milestones in the agency’s activities between 2020 and 2024; an overview of the self-assessment phases; an outline of the national and regional legal frameworks for higher education and QA; a description of the university and QA systems in Andalusia, and the history, profile and activities of the agency; evidence and comments on its compliance with the ESG; opinions of its stakeholders; recommendations of the previous external review and related follow-up action taken; a SWOT analysis; and an overview of key challenges and areas for future development. Each section of the SAR included links to key documents. The annexes contained detailed statistics on the evaluations conducted between 2019 and 2023 and an overview of the criteria for all evaluation processes.

The SAR was well structured and provided comprehensive information about key aspects of ACCUA’s activities, an insight into major changes introduced by the establishment of the agency as the legal successor of AAC-DEVA, and reflections under several standards of the ESG where the agency considered that it would still need to make progress. Nevertheless, the SAR would have benefitted from more details about, or a more in-depth and / or self-critical analysis of the areas highlighted in the 2019 review recommendations (e.g. engagement with stakeholders outside the universities; thematic analysis), changes in the organisational structure, staffing and staff training plans that are still ongoing or planned and related challenges for the agency. This would have been particularly useful as some documents available on the ACCUA website (to which links were included in the SAR) were outdated as referring to AAC-DEVA. The SAR could have also taken a more enhancement-oriented approach considering that the agency was undergoing its fourth ENQA review.

Site visit

The site visit programme (see Annex I) was prepared jointly by the panel and ACCUA’s liaison person. During the visit, the panel met with all key stakeholder groups: the agency’s governing, executive and technical bodies (including some former members of the AAC-DEVA technical body), the working group responsible for self-assessment, coordinators, staff, external evaluators, and representatives of the Regional Government of Andalusia, heads and QA officers of universities, students and social partners. The programme did not include a separate meeting with representatives of the Regional Government since they attended the meetings with the agency’s governing bodies in their respective capacity as the agency’s single-person authority or members of its collective governing body (see “ACCUA’s Organisation/Structure”). The representatives of social partners who are members of the agency’s collective governing body attended the meeting with social partners as they were unavailable for the meeting with the governing body. At the end of the visit, the panel had an internal meeting to agree on the conclusions from the review and a debriefing for ACCUA on the main findings.

The site visit was well organised. Despite the interpreting required for most participants, all meetings were conducted efficiently, and the panel was impressed by the high quality of the interpreting. The panel appreciated very much the willingness of all participants to engage in the discussions in a frank and constructive manner. The meetings with the agency’s internal stakeholders also showed that they were aware of some issues (for example, in internal and external communication, and engagement with stakeholders outside the universities) that were not particularly highlighted in the SAR and were

already taking action to address them. Furthermore, the panel felt that the agency was open-minded and receptive to suggestions for enhancement that emerged from the discussions.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The responsibility for higher education in Spain is shared between the State, the Autonomous Communities and universities. As the main national legislative act, Organic Law 2/2023 of 22 March 2023 on the University System provides an overall framework for the Spanish University System to ensure homogeneity and coherence. The key regional legislative acts governing the Andalusian University System include:

- Legislative Decree 1/2013 of 8 January 2013 approving the consolidated text of the Andalusian University Law, which provides for full integration of the Andalusian University System into the EHEA and addresses university quality;
- Decree-Law 8/2023 of 24 October 2023 amending Article 40 of the Consolidated Text of the Andalusian University Law, approved by Legislative Decree 1/2013, which revised the Andalusian University Law to include new categories of teaching staff established in the national organic law; and
- Decree 154/2023 of 27 June 2023 on the organisation of official university education in the Autonomous Community of Andalusia.

Within the national framework and without prejudice to university autonomy, the 1981 Statute of Autonomy for Andalusia, amended in 2007 by Organic Law 2/2007 of 19 March 2007, grants to the Autonomous Community exclusive powers to, for example, plan and coordinate the Andalusian University System; establish public universities and issue authorisations to private universities; approve statutes of public universities and organisational regulations of private universities; coordinate university admission procedures; set a legal framework for non-official or university-specific degrees (as opposed to official degrees; see below); and finance public universities.

The State and the Autonomous Community share the powers over matters such as the setting of requirements for the creation and recognition of universities and university centres and the affiliation of centres to universities; the legal framework for the organisation and functioning of public universities; the affiliation of public or private centres to offer official degrees; the creation, modification and abolition of centres in public universities, and the recognition of centres in private universities; the establishment and abolition of degree programmes; the regulation of the university admissions system; and QA and evaluation of university education and teaching and research staff. The Autonomous Community oversees the award of degrees in university education.

The Andalusian University System consists of 13 universities (14.3% of all Spanish universities): ten public and three private institutions, but two private institutions have not started operating yet. The Andalusian institutions represent 20.0% and 7.3% of all public and private universities in Spain, respectively. Each province in Andalusia has one public university, except Seville where there are three. The oldest public institutions, and the largest ones in terms of the number of students and degree programmes offered, are the University of Granada and the University of Seville.

The university degree system in Spain is based on three cycles, leading to a Bachelor's degree (240, 300 or 360 ECTS), a Master's degree (60, 90 or 120 ECTS), and a doctoral degree (PhD programmes comprise structured training but are not required to define student workload in ECTS credits). The legislation makes a distinction between official and non-official degree programmes. Official university programmes are those that have successfully undergone a verification (ex-ante evaluation) conducted by a Spanish QA agency registered in EQAR, and thus are included in the Register of Universities, Centres and Degrees (RUCT) and lead to degrees which are recognised by the Spanish Government.

Non-official programmes are not subject to mandatory external evaluation and lead to a certificate or diploma awarded by a university rather than by the State.

In the academic year 2022/2023, the Andalusian universities provided a total of 1,291 official degree programmes (13.7% of all programmes in Spain), including 549 Bachelor's and double Bachelor's degree programmes, 591 Master's and double Master's degree programmes, and 151 doctoral programmes. The number of programmes offered varied from 233 and 238 at the Universities of Granada and Seville, respectively, to 56 at the Loyola University Andalusia and 25 at the International University of Andalusia. The largest proportion of the programmes were offered in Social and Legal Sciences (38.3%), followed by Engineering and Architecture (22.8%), Arts and Humanities (13.9%), Sciences (13.2%) and Health Sciences (11.9%).

The number of students varied slightly in the last five years, growing from 245,965 in the academic year 2018/2019 to 246,118 in 2019/20 and 248,266 in 2020/2021, and dropping to 246,879 in 2021/2022 and 245,574 in 2022/2023. In 2022/2023, students in the Andalusian University System represented 14.3% of the student population in Spain. Nearly half of them (45.9%) were enrolled at the Universities of Granada and Seville. Female students outnumbered male students (56.5% and 43.5% respectively), with similar proportions across the Andalusian universities. The graduate employment rates varied from 54.4% for Bachelor's degrees and 59.3% for Master's degrees to 64.0% for doctoral degrees in 2020/2021. In 2021/2022, international students represented 6.8% of the student population, with the largest proportion enrolled on doctoral programmes (29.2%), followed by Master's and Bachelor's degree programmes (17.9% and 3.6%). Most of them came from Latin America and the Caribbean (43.1%), the European Union (20.9%) and North Africa (16.3%).

QUALITY ASSURANCE

The national legislation lays down key arrangements for QA in Spain, including general conditions and procedures for external evaluation and accreditation processes and basic requirements for the QA agencies to conduct these processes. Within the national framework, the competent authorities of the Autonomous Communities adopt specific regulations for their university systems and QA agencies.

Organic Law 2/2023 sets an overall framework for QA activities, with the responsibility for quality shared between universities, QA agencies and the public authorities; requires that universities assure quality in line with international standards, and in particular those adopted in the EHEA; and authorises the National Agency for Quality Assessment and Accreditation (ANECA) and QA agencies of the Autonomous Communities that are registered in EQAR to conduct evaluations of degree programmes and teaching staff and institutional accreditation reviews, and perform other functions assigned to them by the national and regional legislation. General procedures for QA are laid down in Royal Decree 640/2021 of 27 July 2021 on the creation, recognition, and authorisation of universities and university centres, and institutional accreditation of university centres, and Royal Decree 822/2021 of 28 September 2021 establishing the organisation of university education and the quality assurance process.

The three recently passed legislative acts have introduced some novelties in the Spanish QA system. Organic Law 2/2023 promotes institutional accreditation as an alternative to programme evaluation, the establishment of European Universities Alliances and international joint programmes to foster student mobility, the simplification of administrative procedures, and further decentralisation and cooperation with regional QA agencies. Royal Decree 640/2021 provides for mandatory involvement of students and optional involvement of representatives of society in programme evaluation panels, and streamlines programme evaluation procedures for university centres which have received institutional accreditation. Royal Decree 822/2021 allows the Spanish QA agencies to recognise an evaluation report on an international joint programme issued by another EQAR-registered agency provided that it followed the *European Approach for Quality Assurance of Joint Programmes* in its evaluation.

Currently, there are 11 QA agencies in Spain: ANECA and ten regional agencies, including ACCUA. The agencies are members of the Spanish Network of University Quality Agencies (REACU), where they discuss issues of common interest and jointly develop general reference frameworks and protocols for external QA activities. All of them, except one (which was undergoing its first ENQA review at the time of the panel's site visit), are listed on EQAR.

At the national level, the General Conference on University Policy, which brings together the Spanish and Regional Ministers in charge of higher education, establishes and coordinates university policies and approves criteria for the coordination of external QA activities. The Council of Universities, composed of the Spanish Minister and the Rectors of public and private universities, takes final decisions in the verification, substantial modification and accreditation renewal processes for official degree programmes and institutional accreditation of university centres, based on reports submitted by the QA agencies. Its decisions provide the basis for the entry of universities, centres and degrees onto the RUCT, which is managed by the Spanish ministry in charge of higher education. The General Directorate of University Coordination, as part of the Regional Government of Andalusia, establishes the range of degrees to be offered in Andalusia and grants authorisations for universities to implement, modify and abolish degree programmes.

AGENCY FOR SCIENTIFIC AND UNIVERSITY QUALITY OF ANDALUSIA (ACCUA)

ACCUA is the legal successor of AAC-DEVA, which was established in 2007 by Law 16/2007 of 3 December 2007 and became operational in 2011 with the entry into force of Decree 92/2011 of 19 April 2011 approving its statutes. Before 2011, external QA was the responsibility of the Andalusian Agency for Evaluation and University Accreditation (AGAE) (2005-2011), and the Administrative Consortium Unit for the Quality of Andalusian Universities (UCUA) (1998-2005).

ACCUA is a public administrative agency operating in accordance with Law 9/2007 of 22 October 2007 on the Administration of the Regional Government of Andalusia. It was created in 2021 by Law 9/2021 of 23 December 2021 which creates the Business Agency for Economic Transformation and Development (TRADE) and the Agency for Scientific and University Quality of Andalusia (ACCUA). The agency was formally established on 1 March 2023 with the entry into force of Decree 17/2023 of 14 February 2023 approving the Statutes of the Agency for Scientific and University Quality of Andalusia (ACCUA). It is assigned to the Andalusian Ministry of University, Research and Innovation.

The agency's mission (or its general purpose as stated in its Statutes) is "to promote the quality of the Andalusian Knowledge System, in accordance with international scientific and academic standards, and to provide the Universities, Higher Education Institutions, Research Institutions and other Agents of the Andalusian Knowledge System with the quality criteria and references that allow them to fulfil their social function in the best possible way". The agency pursues its mission through external QA activities, the dissemination of information on the functioning and quality of the Andalusian Knowledge System and the organisation of knowledge-sharing events for its stakeholders (ACCUA's Statutes).

Between 2019 and 2022, the agency introduced four new external QA activities: accreditation of internal QA systems (IMPLANTA) (with a pilot completed by the time of the previous review) and institutional accreditation (2019), evaluation of Successive Academic Programmes and evaluation of international joint programmes based on the *European Approach for Quality Assurance of Joint Programmes* (2022) (see "ACCUA's Functions, Activities, Procedures"), and updated its guides for ongoing evaluation processes in line with the new legislation (see "Quality Assurance").

Following its establishment and the approval of its Statutes, ACCUA adopted its 2023-2026 Initial Action Plan and 2024 Annual Action Plan in 2023. Its Governing Council and Director and the coordinators of the core areas of its activity were appointed in the same year; the Director took up

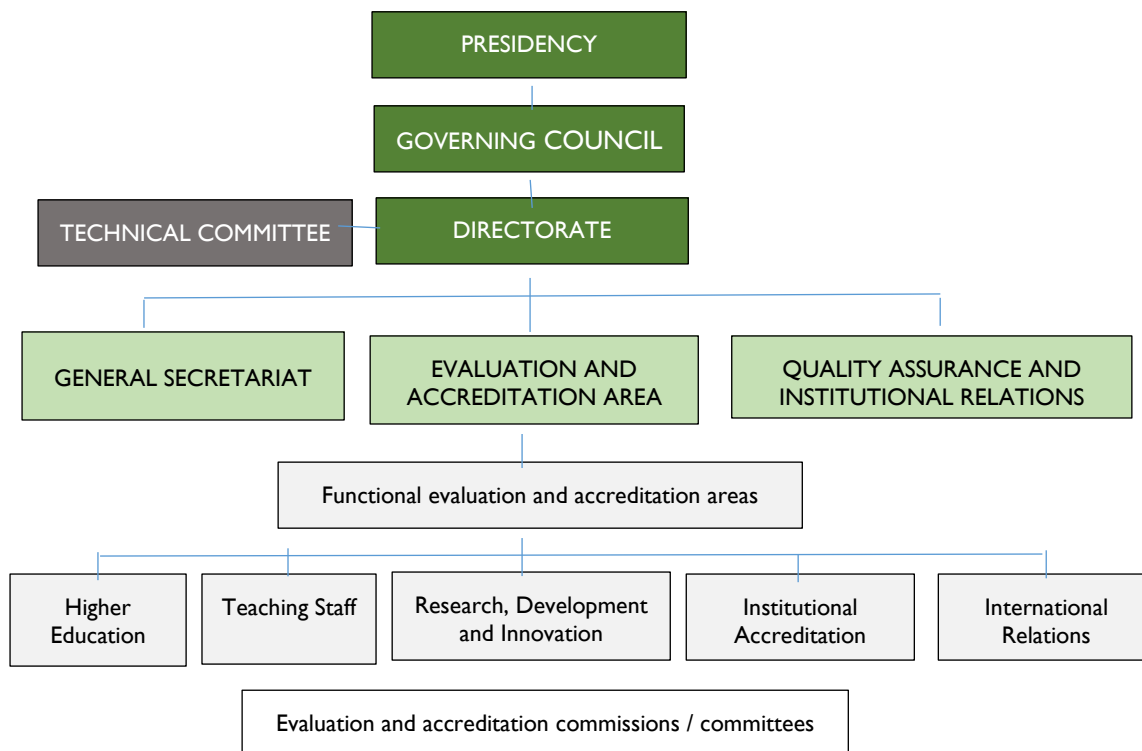
his post in November 2023. Members of its QA Commission (responsible for internal QA) and Technical Committee (the technical and advisory body) were appointed in early 2024. At the time of the panel's site visit, two middle-level managers had yet to be appointed; some AAC-DEVA documents (the Service Charter, the Code of Ethics, the Quality Manual) were still in force, and the versions updated for ACCUA had yet to be approved by the agency's competent bodies.

ACCUA has been a member of ENQA since 2000 and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) since 2010, and has been registered in EQAR since 2009. In 2022, the agency joined the Coalition for the Advancement of Research Assessment (CoARA) and the Global Academic Integrity Network (GAIN).

ACCUA'S ORGANISATION/STRUCTURE

ACCUA has the following bodies: the Presidency (President) and the Governing Council as the governing bodies, the Directorate (Director) as the executive body, and the Technical Committee as the technical and advisory body.

The agency's administrative structure consists of the General Secretariat, with the General Secretary as its head, and the Evaluation and Accreditation Area and the Quality Assurance and Institutional Relations Area, each with a Head. Since Heads of Areas (middle-level managers) were not yet appointed at the time of the panel's site visit, their functions were temporarily performed by the Director. Within the Evaluation and Accreditation Area, there are five functional areas (Higher Education, Teaching Staff, Research, Development and Innovation, Institutional Accreditation, and International Relations), each led by a coordinator, which correspond to the main strands of ACCUA's activities. The functional areas support the evaluation and accreditation committees that are directly involved in external QA activities.



By virtue of law, the **Presidency** is held by the head of the ministry to which ACCUA is assigned (hereafter referred to as the Regional Minister). The President is the highest-level representative of the agency; ensures that it performs its functions and achieves its objectives; convenes and chairs meetings and endorses resolutions of the Governing Council, and has a casting vote in the case of a tied vote.

The **Governing Council**, the highest-level collective body, approves ACCUA's multiannual strategic plans and modifications therein and its annual activity reports, staffing table, public employment offer, training plans and equity plans. Except for the Director with specific responsibilities (see below), Council members may not be involved in any external QA activities of the agency.

The Governing Council is composed of 17 members:

- the ACCUA President;
- the ACCUA Director;
- three representatives of the Regional Government: two members representing the Regional Ministry to which the agency is assigned, and one representing the Regional Ministry in charge of primary and secondary education; each holding the position of Secretary or Director General;
- 12 members appointed by the Regional Minister (the Chair of the Council):
 - two representatives of the Rectors and two representatives of the Presidents of the Social Councils of the Andalusian universities, nominated by the Andalusian Council of Universities;
 - four members with high prestige in the field of scientific research or professional activity and proven experience in QA (currently, full professors coming from Andalusian universities);
 - two representatives of the Administration of the Regional Government (departments in charge of scientific or technical research), each holding at least the position of Director General; and

- two students representing the Advisory Council of University Students of Andalusia (CASEUA), nominated by this body.

Except for those involved by virtue of their position in the Regional Government, Council members are appointed for a four-year term and may be re-appointed for one subsequent term.

The **Director** is selected through an open competition from among persons of high academic and scientific standing who are career civil servants, is proposed by the Regional Minister and appointed by the Governing Council of the Regional Government of Andalusia for an indefinite term (the current Director has undertaken to take up the post for an initial period of four years). The Director is the legal representative of the agency in day-to-day management. As part of his/her main executive functions, the Director draws up a strategic plan for approval by the Governing Council and approves annual activity plans and reports; manages human and financial resources; handles complaints about the agency's services; oversees the implementation of its internal and external QA policy; and promotes its collaboration with regional stakeholders and national and international QA agencies. As part of his/her main evaluation and accreditation functions, the Director proposes evaluation and accreditation criteria and guides for approval by the Technical Committee; appoints area coordinators and members of the evaluation and accreditation committees; and issues acts, resolutions and reports in the evaluation and accreditation processes.

The **Technical Committee** supports the Director in the performance of his/her evaluation and accreditation functions. It approves the agency's evaluation and accreditation processes (referred to as programmes), criteria and guides; supervises the compliance of its organisational structure with the accreditation and evaluation programmes; prepares reports on matters within its remit; and reviews reports on the results of evaluation and accreditation processes. It consists of the Director as its chair; the Heads of the Evaluation and Accreditation and Quality and Institutional Relations Areas; the area coordinators; and 14 members with prestigious international academic careers and experience in scientific, academic or professional evaluation, all coming from Andalusian universities, and two students, all of whom are appointed by the Director, after consultation with the Governing Council, for a four-year term and may serve one additional term.

The **General Secretariat** supports the Director in the performance of his/her executive functions (legal matters, administration, accounting). The Head of the **Evaluation and Accreditation Area** assists (or will assist, when appointed) the Director in the issuing of QA resolutions, the development of evaluation guides and protocols and the coordination of the five functional areas. The Head of the **Quality Assurance and Institutional Relations Area** assists (or will assist, when appointed) the Director in matters related to internal QA and institutional cooperation, including compliance with the ESG and EQAR requirements, and collaboration with national and international stakeholders. As the agency explained to the panel during the site visit, the President and the Director are also supported by the **Manager** in charge of general matters. The Director, the General Secretary and the Manager form the management team (to be joined by the Heads of Areas when appointed).

The five **functional evaluation and accreditation areas**, which are structured according to academic areas where appropriate, provide support to the evaluation committees and to the Director in the performance of his/her evaluation and accreditation functions. The **area coordinators** coordinate and monitor evaluation and accreditation processes, but may not be members of evaluation and accreditation committees, nor prepare evaluation and accreditation reports. They are not ACCUA's staff but experts who work on a non-exclusive and part-time basis, while holding academic posts at their home higher education or research institutions in Andalusia. They are appointed by the Director for a four-year term and may serve one additional term. They are supported by the agency's staff working in one or more functional areas. Aside from the Director, ACCUA has **43 staff**: 35 persons employed as agency staff and eight who have the status of civil servants of the Regional Government of Andalusia.

The **evaluation committees** (or smaller review panels selected from among their members) conduct evaluations and accreditation reviews and produce independent reports which are binding upon the Director. They are appointed by the Director from among external experts registered in ACCUA's Database of Evaluators.

ACCUA'S FUNCTIONS, ACTIVITIES, PROCEDURES

ACCUA conducts the following external QA activities that fall within the scope of the ESG (as listed in the ToR):

- Accreditation of foreign language skills
- Accreditation of Quality Assurance Systems
- DOCENTIA programme for teaching activity evaluation
- European Approach for Quality Assurance of Joint Programmes
- Ex-ante verification of study programmes (ex-ante programme evaluation)
- Substantial modification of study programmes
- Ex-post re-accreditation verification of study programmes (ex-post programme evaluation)
- Follow-up/monitoring of study programmes
- Institutional accreditation
- Modification of study programmes (non-substantial modifications)
- Successive Academic Programmes (PARS)
- Reviews of universities for recognition

The agency also carries out the following QA activities that are not listed in the ToR and are considered by the panel as falling outside the scope of the ESG:

- Teaching staff: Evaluations of teaching staff, emeritus teaching staff, and teaching performance incentives
- Research activities: Evaluations of research, development and innovation (R&D&I) projects and other grant proposals, university research institutes, human resources and knowledge transfer activities.

The ESG focus on QA related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation. Based on its analysis of the criteria, the panel confirms that evaluations of research activities fall outside the scope of the ESG. R&D&I projects, other grant proposals and knowledge transfer activities are not directly related to QA arrangements for learning and teaching; evaluations of human resources focus on the recruitment of research staff for specific tasks or positions; and evaluations of research institutes address their capacity to secure external funding, justification for research activities to be conducted, and the number and qualifications of staff to be employed. Evaluations of teaching staff extend beyond the scope of the ESG as they aim to check compliance with the legal requirements for the appointment of specific categories of academic staff and professors emeriti and for the granting of incentive-type salary supplements to academic staff.

The table below provides the number of evaluations and accreditation reviews conducted by the agency in the last five years. The processes falling within the scope of the ESG are outlined below.

QA activity	2019	2020	2021	2022	2023
<i>Official degrees:</i>					
Verification of study programmes	36	29	17	37	32
Follow-up/monitoring of study programmes	356	287	364	223	133
Modification of study programmes	112	114	108	111	249
Accreditation renewal	217	171	149	224	86
European approach for QA of Joint Programmes	-	-	-	-	1
<i>Institutions:</i>					

DOCENTIA: Teaching activity evaluation ⁽¹⁾	2	-	3	-	-
IMPLANTA: Accreditation of QAS	-	5	2	5	8
Institutional accreditation	8	3	2	-	4
Reviews of universities for recognition ⁽²⁾	2	1	2	3	1
Accreditation of foreign language skills ⁽³⁾	1	2	1	-	1
Teaching staff ⁽⁴⁾	1,246	1,036	1,200	1,342	1,195
Research activities	5,926	3,668	4,972	1,973	1,841

SAR: The data includes ⁽¹⁾evaluations of programme design and follow-up; ⁽²⁾reviews of centres and objections to reports; and ⁽³⁾ follow-up reports issued; and does not include ⁽⁴⁾10,560 applications for regional supplements evaluated in 2019.

In addition to its external QA activities, the agency has co-organised in recent years a series of online seminars on university education issues for external stakeholders and a course on internal QA systems for universities. ACCUA does not provide consultancy services to universities or other stakeholders.

The agency participates in ENQA and INQAAHE General Assembly meetings. Between 2019 and 2022, its staff attended training events organised by ENQA (Seminar for recently reviewed agencies, and Seminar “Outcomes of the EUniQ Pilots and Implications for the Framework for QA of European Universities”) and the European Consortium for Accreditation in Higher Education (Course on the European Approach for Quality Assurance of Joint Programmes), and the international conference “Advances in building the Ibero-American Knowledge Area: a look into the future” in Colombia.

Together with Andalusian and Austrian universities and the European Students’ Union (ESU), the agency carried out the Erasmus+ project "STUPS-Student participation without borders", which aimed to strengthen student participation in good governance in higher education. It is involved in EQAR’s DEQAR project “Database of External Quality Assurance Results”. Currently, ACCUA is a partner in the ongoing EDLab project, which brings together 13 universities and 35 partners, including European University alliances, ministries and QA agencies, and aims to further the implementation of international joint programmes and the European Degree Label. The agency has also set up a working group, composed of representatives of European Universities Alliances, including Andalusian universities, to coordinate the design and ex-ante evaluation of international joint programmes.

Evaluation and accreditation processes falling within the scope of the ESG

Official university degrees

Pursuant to the national legislation, programme evaluations are mandatory for universities.

For entry of official degrees onto the RUCT, new Bachelor’s, Master’s and PhD degree programmes undergo a **verification** process (ex-ante evaluation). A university can make changes in a programme as a result of an internal QA review or the agency’s follow-up. Where changes affect the nature, objectives and fundamental characteristics of a degree, the programme is subject to an evaluation of **substantial modifications**. ACCUA conducts evaluations and issues reports in the verification and substantial-modification evaluation processes, but final decisions are taken by the Council of Universities at the national level (see the section “Quality Assurance”).

ACCUA evaluates and approves **non-substantial modifications** in programmes at university centres (administrative units offering official degrees) which have not received institutional accreditation (are not “institutionally accredited”). Modifications in programmes at “institutionally accredited” centres are approved by the competent governing body of a university, based on a report prepared by an internal QA body, and reported to ACCUA and the regional and national authorities.

As part of non-substantial modifications, universities may also establish PARS, **Successive Academic Programmes** (as referred to in the ToR for the review) or Academic Programmes with Successive

Pathways, in the field of Engineering and Architecture. PARS are pathways which link Bachelor's and Master's degree programmes and allow students to enrol on a Master's programme before they obtain a Bachelor's degree, and in the meantime, to complete the remaining courses and the Final Project (for a maximum of 30 ECTS) for the Bachelor's degree. PARS evaluation was introduced in 2022. ACCUA evaluates PARS against specific criteria and takes final decisions in this process. PARS do not imply any changes in the design and independent status of the Bachelor's and Master's degree programmes concerned and are not registered in the RUCT as new programmes.

ACCUA has in place a **follow-up** (as a separate process rather than part of verification or accreditation renewal) for new and reaccredited programmes provided by centres which are not institutionally accredited. It aims to ascertain whether a degree programme is implemented in accordance with the verification (ex-ante evaluation) report and encourage continuous improvement. It takes place in the third or fourth year after the implementation or reaccreditation of a programme. The follow-up for programmes offered by institutionally accredited centres is conducted by ACCUA as part of the follow-up in the QAS accreditation process (IMPLANTA). The simplified procedure for such centres has been introduced to encourage universities to assume greater responsibility for quality and to apply for accreditation of internal QA systems as a prerequisite for institutional accreditation.

Accreditation renewal is required every six years for 240 ECTS Bachelor's degree and for Master's and PhD degree programmes, and every eight years for 300 or 360 ECTS Bachelor's degree programmes. Final decisions, based on ACCUA's reaccreditation reviews, are taken by the Council of Universities. The agency carried out its first reaccreditation reviews of PhD programmes in 2018/2019.

In accordance with the national legislation, evaluation of international joint programmes is based on the **European Approach for Quality Assurance of Joint Programmes**. ACCUA introduced this process in 2022 and conducts evaluations every six years. Final decisions are taken by the Council of Universities. Until the time of this ENQA review, the agency had evaluated one joint programme (2023) and received one new application; two more applications were expected.

Based on a cooperation agreement with the Russian agency AKKORK, between 2016 and 2019 the agency conducted evaluations of 11 Bachelor's and Master's degree programmes at the Peoples' Friendship University in Russia.

Universities or university centres

Review of universities for recognition

Universities and university centres are officially created or recognised by a law of the Parliament of Andalusia if they meet the requirements set in the national legislation. This is based on a report mandatorily prepared by the competent regional bodies (the Andalusian Council of Universities and the University Coordination Council), but the regional ministry in charge of higher education may request ACCUA to assess compliance with the national requirements and submit a report.

IMPLANTA: Accreditation of Quality Assurance Systems

This is a voluntary process, conducted at the level of university centre, which aims to ascertain that a centre has in place an effective internal quality assurance system (QAS) and provides high-quality training that meets the needs of students and society. It was introduced by the national legislation to encourage transition from programme to institutional accreditation, with a QAS accreditation certificate being a prerequisite for institutional accreditation, and has been implemented in Andalusia since 2019. ACCUA awards a certificate for six years. In addition to QAS accreditation reviews carried out in Andalusia, the agency evaluated the QAS at the Faculty of Psychology, Saint Petersburg University, Russia, in 2019.

Institutional accreditation

This voluntary process is conducted at the level of university centre. It has been introduced in Spain to reflect the principle of co-responsibility of universities and QA agencies for QA and to streamline the burdensome process of programme reaccreditation. Thus, since 2015 the national legislation has allowed institutionally accredited centres to renew the accreditation of their official programmes through an institutional rather than programme reaccreditation review. To apply for institutional accreditation, a centre is required to have its QAS accredited, and the programme accreditation renewed for at least half of its official Bachelor's, Master's and PhD degrees (50% at each level of study). ACCUA reviews the documentation for the QAS accreditation and programme reaccreditation to formally verify compliance with the requirements set in the legislation. Based on its reports, the Council of Universities takes final decisions and grants accreditation for six years. During the validity period of institutional accreditation, a centre is not required to submit QAS documentation in the programme verification, follow-up and modification processes.

First institutional accreditation reviews were carried out by ACCUA in 2019 and were initially based on QAS accreditation certificates issued by ANECA as IMPLANTA was not yet in place in Andalusia. Until the time of this review, 17 centres have received institutional accreditation. Since the length of the accreditation cycle is six years, the agency does not conduct yet institutional reaccreditation reviews.

DOCENTIA: Teaching activity evaluation

This is a voluntary process conducted by ACCUA under the agreement signed with ANECA in 2007 and updated in 2022. It aims to assist universities in the design of mechanisms for quality management of teaching activities. Within the framework agreed between the Spanish QA agencies, universities develop their own models for QA of teaching staff. The process includes the following phases: evaluation of the university's model and procedures in terms of their compliance with the DOCENTIA framework; follow-up: a review of the implementation of procedures after at least two years; certification; and certification renewal. ACCUA takes final decisions and awards certificates which are valid for five years. Until the time of this ENQA review, most of the Andalusian universities had passed the design phase, and some had submitted their third implementation follow-up reports.

Accreditation of foreign language skills

The process evaluates procedures adopted by the Andalusian universities for the development, management and marking of foreign language proficiency tests. It is based on the Common European Framework of Reference for Languages (CEFR) and a procedure and criteria for the accreditation of language skills agreed between the Andalusian universities and ACCUA (AAC-DEVA). Once accreditation procedures are in place, a university applies, on a voluntary basis, to the agency for accreditation. Final decisions are taken, and certificates are issued by ACCUA. Accreditation reviews are conducted every four years, with annual follow-up reports submitted by universities. Until the time of this ENQA review, two centres have received the agency's accreditation.

ACCUA'S FUNDING

ACCUA is fully funded from the budget of the Regional Government of Andalusia. Pursuant to its Statutes, other sources of its income may include, for example, subsidies or budgetary allocations from any other public or private entity; fees for evaluation and accreditation services; disposal of, and returns on assets; voluntary contributions, grants, donations and legacies.

As ACCUA's legal predecessor, DEVA was part of the AAC till early 2023, some staff performed tasks for different units of the AAC and administrative costs were shared across the organisation. Thus, except for costs of external QA activities, a DEVA budget could not be separated from the total budget of the AAC for the years 2019-2022. In the last two years, ACCUA's total budget increased

by 3.65% from €3,808,242 in 2023 to €3,947,580 in 2024. The main expenditure items are staff salaries and external QA activities (fees and travel, subsistence and other costs of evaluators): 60% and 38% in 2023, and 62% and 36% in 2024, respectively.

FINDINGS: COMPLIANCE OF ACCUA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2019 review recommendations: (1) As a matter of urgency, the agency¹ should complete its own Strategic Plan. (2) The agency should conduct a review of its organisational structure (with a specific focus on the DEVA structure as part of the AAC structure). External expertise should inform this exercise. (3) The agency should begin the process of much wider stakeholder engagement.

Evidence

The 2019 review panel considered that the absence of a strategic plan for DEVA and its organisational structure, where the governance responsibilities were assigned to the AAC rather than to DEVA, combined with the limited human resources (see ESG 3.5), were the key constraints for the agency. Thus, the agency lacked a strategic focus, was preoccupied with daily work and used all of its resources for QA activities, had no structured approach to the development of areas for improvement, and was unable to provide system-level leadership to universities in the move from programme to institutional accreditation. (2019 external review report)

Goals, objectives and challenges

ACCUA's mission (referred to as its general purpose in its Statutes) is "to promote the quality of the Andalusian Knowledge System, in accordance with international scientific and academic standards, and to provide the Universities, Higher Education Institutions, Research Institutions and other Agents of the Andalusian Knowledge System with the quality criteria and references that allow them to fulfil their social function in the best possible way". The mission statement is published on the ACCUA website.

The main challenges for ACCUA in pursuing its mission are to strengthen its role in promoting quality in the Andalusian Knowledge System; support universities in assuming greater responsibility for QA of programmes; streamline its QA procedures to reduce their bureaucratic burden; and enhance its national and international visibility (SAR). The ACCUA President, the Management Team and the SAR Group told the panel that the agency needs to improve outreach and convince universities that it is acting as an adviser or partner for improvement rather than an auditor, to increase the number of institutionally accredited centres and help universities move towards institutional accreditation as an

¹ The 2019 review recommendations referred to AAC-DEVA as the legal predecessor of ACCUA. To avoid confusion, the name "AAC-DEVA" has been replaced, where possible, with the term "the agency" in the recommendations reproduced in this report.

alternative to burdensome programme reaccreditation. The rectors and QA officers interviewed agreed that both ACCUA and the universities should now refocus their efforts on institutional accreditation as the best way to ease the burden of evaluations and change the perception of the agency.

At the time of the previous ENQA review, the only strategic document available was the 2016-2020 Strategic Plan for the AAC rather than one specifically dedicated to DEVA. In response to the first 2019 review recommendation, DEVA began devising such a plan for the subsequent planning period in 2019, but following the enactment of the legislation establishing ACCUA, efforts were redirected to create the new agency and planning was based on annual budgets. (SAR)

Pursuant to its Statutes, ACCUA should adopt an initial action plan and develop a multiannual strategic plan before the end of the validity period of the initial plan. The agency adopted its 2023-2026 Initial Action Plan in 2023; it was approved by the Regional Minister in December 2023. At the stage of developing the Plan, it held consultations, through meetings and surveys, with its Governing Council and staff, universities and the regional authorities (SAR; Meetings with the President and the Management Team, and the Governing Council). Students and social partners were consulted through their representatives on the Governing Council; the student representatives had not been involved in the agency's activities before and thus were unable to make specific suggestions, but they are keen to contribute in the future (Meetings with students and social partners). The university rectors whom the panel met welcome the Initial Action Plan as it is based on the needs they expressed during the agency's consultations.

The Plan sets the following strategic lines: 1. *Strategic Governance and Quality*: develop a strategic governance system based on the principle of continuous improvement to achieve the highest satisfaction of stakeholders and promote a culture of quality in the Andalusian Knowledge System; 2. *Continuous Improvement of Procedures*: optimise resources and systems dedicated to evaluation procedures to make them more efficient and effective, thus improving their external recognition; 3. *Communication and Enhancement*: share with stakeholders and society at large the results of the evaluation work so that the strengths of the Andalusian Knowledge System can be recognised and valued. The Plan links each strategic line to specific objectives and provides an overview of resources. The strategic objectives are operationalised through the 2024 Action Plan, which includes activities and implementation schedules, responsible areas or units, performance indicators and resources.

Activities

ACCUA conducts evaluations and accreditation reviews (hereafter jointly referred to as evaluations) at the programme, institutional and centre levels on a regular basis (see "ACCUA's Functions, Activities, Procedures"). The sections on ESG 2.1 to 2.7 of this report provide evidence on how the agency conducts its external QA activities in the context of Part 2 of the ESG. Despite the transition from AAC-DEVA to ACCUA, external QA activities were carried out as planned (Online clarification meeting; Meetings with the President and the Management Team, university rectors and QA officers).

Aside from QA activities, the agency co-organised in 2020 and 2021 a series of online seminars on university education in specific areas for its stakeholders (university staff, employers, secondary education institutions, public administration, graduates and students) in collaboration with other Spanish regional agencies and a course on the design, implementation and accreditation of QAS for university centres, in collaboration with the International University of Andalusia. It has also participated in international projects together with Andalusian universities. (See "ACCUA's Functions, Activities, Procedures"). It holds regular meetings with universities to discuss QA issues. (SAR)

The 2024 Annual Action Plan includes activities focusing on external QA, including, in particular, a review and streamlining of evaluation processes; promotion of evaluation processes at institutional / centre level (QAS accreditation, institutional accreditation, DOCENTIA); identification of related training needs

of universities; capacity building courses and seminars on QA for universities; and activities aimed at enhancing the performance of the agency itself, such as a review and improvement of internal management processes; the establishment of a data management system to facilitate decision-making and dissemination of results, and the development of an internal and external communication plan.

As the Director explained to the panel, 2023 was a transition year for the agency and this phase was longer than expected as the Director took his post in November 2023, and the activities related to the establishment of the new agency coincided with the revision of the evaluation guides in line with the new legislation on QA and the elections of rectors at the universities, with more than a half of them elected as new to their position.

In the first quarter of 2024, the Director visited all universities to discuss ACCUA's objectives and training needs of the universities. At the time of the panel's visit, the agency was preparing to design the planned courses and seminars for universities; the work to review and streamline the evaluation processes was underway; a map of management processes was being updated; and a communication plan was being devised. (Meetings with the President and the Management Team, QA Commission and university rectors and QA officers; Final clarification meeting)

Organisational structure, strategic oversight and management

For details about the agency's structure, see "ACCUA's Organisation/Structure". ACCUA's structure is similar to that of AAC-DEVA in that it includes the Governing Council chaired by the President, the Technical Committee, the General Secretariat and five evaluation and accreditation areas coordinated by external experts. However, while the AAC comprised two main divisions, one focused on R&D&I promotion and transfer of knowledge and led by the Managing Director, and another (DEVA) in charge of evaluation and accreditation, managed by the DEVA Director, ACCUA's functions and structure cover only evaluation and accreditation. Some major changes were introduced to address the second 2019 review recommendation. DEVA's Director was responsible only for evaluation and accreditation, reporting twice a year to the AAC Governing Council, and the executive functions were assigned to the AAC Managing Director, whereas ACCUA's Director has both executive and evaluation-and-accreditation functions and is a member of the Governing Council. ACCUA's structure has been reinforced by the creation of the Evaluation and Accreditation Area and the Quality Assurance and Institutional Relations Area, each with a Head (yet to be appointed) to support the Director in his/her executive functions. The agency expects to fill in the two vacancies for Heads by the end of 2024; this requires the adoption of internal regulations and consultations with the regional authorities and trade unions. (2019 review report; ACCUA's Statutes; SAR; Online clarification meeting)

The ACCUA Director submits a strategic plan and annual activity reports to the Governing Council for approval (Statutes; SAR). The Management Team meets every week to discuss ongoing activities and every two-three months to monitor progress towards the strategic objectives set in the Initial Action Plan and the implementation of the 2024 Action Plan. The QA Commission reviews the implementation of the Plans in monthly meetings and reports to the Director. Pursuant to the ACCUA Statutes, the Governing Council meets at least every six months. The Council members interviewed expected that progress in the implementation of the Plans could be discussed at their next meeting. (Meetings with the Management Team, the QA Commission and the Governing Council)

The Technical Committee (appointed a few weeks before the panel's site visit) was not yet familiar with the SAR and was reading the evaluation guides to contribute to the ongoing review of the evaluation methodologies (see also ESG 2.2).

For the staff interviewed, the agency could improve planning, vertical communication and coordination and communication between the offices in Cordoba and Sevilla.

Stakeholder involvement

To address the third 2019 review recommendation, the agency included two students in its Governing Council and created the position of Head for Quality Assurance and Institutional Relations. Currently, the Governing Council consists of representatives of the regional authorities, rectors and social councils of Andalusian universities, academic experts coming from Andalusian universities and students. Academics, students and professionals are members of the Technical Committee, which approves evaluation methodologies, and of the evaluation committees conducting evaluations. (Statutes; SAR; Evaluation guides; Final clarification meeting). Academics in the Technical Committee come from Andalusian universities. In selecting its members, the agency aimed primarily to ensure that they have good knowledge of the Andalusian University System, but the ACCUA President believes that international experts could provide a valuable external perspective in the work of the Committee.

As the panel learned from the Director, all stakeholder groups, including universities, students, social partners and the regional authorities, were involved not only in the consultations about the Initial Action Plan but also in the drafting of the ACCUA Statutes. The rectors interviewed felt that universities had always been at the centre of the agency's activities, contributing to the SAR, the Statutes, the Initial Action Plan and the evaluation methodologies, and appreciated the opportunity to discuss their needs during the Director's recent tour of universities. For the CASEUA representatives whom the panel met, the Governing Council "gives students a voice" and the agency responds to their various requests. It is their responsibility to collect suggestions from and pass on any information to the student community. The representatives of social partners believe that they now have a good representation on the Governing Council and that the agency should do more to make its activities better known to the society. The Director has recently had several meetings with students outside the Governing Council and is willing to meet them on a regular basis. He has also initiated a series of meetings with social partners, starting in Cordoba and planning to involve a wider circle of stakeholders in Andalusia.

All of the external stakeholders whom the panel met consider that the agency has been instrumental in promoting quality improvement in the Andalusian University System and has gained trust and respect for its commitment and professionalism in external QA activities. Both the external and internal stakeholders also highlighted positive results of the transition from AAC-DEVA to ACCUA (see ESG 3.3, 3.5 and 2.2) and the arrival of the new Director. The Director is committed to actively engage the stakeholders to create a sense of ownership, the university rectors now perceive the agency as "more accessible", and the staff are encouraged by the Director to suggest improvements and "delve deeper" into their areas of responsibility. All of the stakeholders expressed high expectations for how the agency will be developing in the future.

Analysis

The panel found in all its meetings that there is a broad consensus among ACCUA's stakeholders about its objectives set in the mission statement and the Initial Action Plan, widespread recognition for the work that ACCUA and its legal predecessors have done over the years and support for the changes initiated since the establishment of the agency. It is also reassuring that the agency and the universities are aligned on prioritising the move from programme to institutional accreditation, which will require a major effort on both sides considering the relatively small number of centres that have been institutionally accredited so far (see "ACCUA's Functions, Activities, Procedures").

ACCUA has fully implemented the first 2019 review recommendation with the adoption of the Initial Action Plan. The Initial Action Plan and the 2024 Annual Action Plan are clearly enhancement-oriented, and are well-conceived to carry forward ACCUA's mission and allow it to take a lead role in the development of QA in the Andalusian University System, and to address the needs of the universities, the challenges faced by the agency and the areas for improvement identified in the previous review

and the SAR. The panel also notes that the stakeholders had a genuine involvement in the development of the Initial Action Plan and are keen to support ACCUA in its implementation.

External evaluations are the core activity through which ACCUA pursues its objectives. The panel can confirm that the agency conducts its external evaluations on a regular basis and the transition from AAC-DEVA to ACCUA did not cause any disruptions in the evaluation schedule. For the panel's comments about the agency's compliance with the standards of Part 2 of the ESG, see sections ESG 2.1 to 2.7 of this report.

In pursuing the agency's objectives, the 2024 Action Plan includes activities designed to develop universities' capacity in QA and promote evaluations at institutional or centre level and to improve the performance of the agency itself. Based on the schedule in the 2024 Action Plan and the update from the agency on its implementation, it is clear to the panel that ACCUA is moving forward with its ongoing activities. However, it is still at the work-in-progress stage (e.g. training needs of universities identified, but courses and seminars not yet designed and delivered; management processes being reviewed; a communication plan in development) and could not provide to the panel much evidence of tangible results achieved. This is understandable considering that the agency was in transition throughout 2023 and the new Director took his post and the Minister approved the Initial Action Plan at the end of 2023. In putting its plans into action, ACCUA can clearly rely on the commitment of the new Director and the strong positive feelings among the staff about the course it is taking.

The panel agrees with ACCUA and the universities that priority should now be given to the shift from programme to institutional accreditation and, thus, to the activities planned to enhance the QA capacity of the universities and promote evaluations at institutional or centre level. The Director's tour of the universities to discuss their needs has laid the groundwork for such activities. However, since training plans had not yet taken shape by the time of the site visit, the panel believes that the agency should intensify its efforts to ensure that the activities are implemented as scheduled in the Plan.

The panel understands from the 2024 Annual Action Plan and its meetings with the agency and university rectors that the planned courses and seminars will be organised as group training sessions for a number of interested institutions rather than as consultancy services for each institution, which would otherwise give rise to a conflict of interest between external QA and capacity building activities. In the panel's view, there is also no risk of a conflict of interest between the joint involvement of the agency and Andalusian universities in international projects and external evaluations as the latter are conducted by independent evaluation committees (see ESG 3.3).

Although some key elements have been transferred from DEVA, ACCUA's organisational structure is less complex than DEVA's, largely because the agency is no longer a part of an institution with a much broader scope of activities and focuses exclusively on evaluation and accreditation. The structure is now well designed to address the concerns of the 2019 review panel about the lack of a strategic focus in the agency's activities and the related recommendation, with the Director being assigned management functions, the governance and management responsibilities clearly divided between the Governing Council and the Director, respectively, and the two bodies sharing oversight responsibilities. With the positions of Heads of Areas created at the middle-management level, the panel expects that the Director will be relieved of some daily duties and have more time for oversight. Regular and frequent meetings of the Management Team and the QA Commission to review progress in the implementation of the Initial Action and Annual Plans allow the Director to steer the agency towards its strategic objectives, and as noted above, progress has indeed been made in the implementation of the Plans. However, here again, since ACCUA began implementing its Initial Action Plan only in 2024 and Heads of Areas are not yet appointed, the organisational structure is not yet fully in place and has yet to demonstrate its effectiveness.

Some of the agency's bodies still need time to settle in, or some working, coordination or communication arrangements have yet to be agreed within the new organisational structure. While the Director takes primary responsibility for the implementation of strategic and annual plans, the panel gathers from its meeting with the Governing Council that apart from Council meetings held every six months, specific oversight arrangements have not been discussed yet. It believes that such arrangements should be agreed at the governance level as a matter of urgency as biannual reporting on the agency's activities by the DEVA Director to the AAC-DEVA Governing Council did not prove to be an effective oversight mechanism, and efficient implementation of ACCUA's ambitious Initial Action Plan requires genuine commitment and support from its Governing Council. As most members of the Technical Committee are newcomers, the panel expects that the Committee will soon be well briefed about ACCUA's past and present activities, so that all members can effectively fulfil their responsibilities. The communication plan, which is being devised, can bridge internal communication gaps and also address the concerns of the staff.

In line with the third 2019 review recommendation, ACCUA has expanded its engagement with stakeholders, and the panel found in the meetings with all stakeholder groups that they are satisfied with the level of their current involvement in the agency's bodies and activities. With students recently included, all stakeholder groups are now represented on ACCUA's Governing Council, and academics, students and professionals on the committees involved in its external QA activities. The panel was heartened by a strong sense of engagement and responsibility of the student members of the Governing Council and the student experts interviewed. The involvement of the stakeholders in the development of the Initial Action Plan was particularly important to gain acceptance for the activities supporting the move from programme to institutional accreditation. While the universities have been extensively involved in the agency's activities over the years, it is promising that the Director has recently initiated meetings with students and social partners outside the agency's bodies. The panel believes that meetings with students could be held regularly to strengthen the relationship with student organisations. It also notes that the position of Head for Quality Assurance and Institutional Relations has been created to improve outreach but, again, results have yet to be seen when the vacancy is filled.

The panel agrees with the President that international experts could contribute meaningfully to the work of the Technical Committee, considering, in particular, ACCUA's objective and ongoing work to streamline further its evaluation procedures. Since there is currently no vacancy on the Committee, international experts could be involved in its work on an ad-hoc basis.

Panel commendations

1. The agency conducted uninterruptedly its external evaluations throughout the hectic period of transition from AAC-DEVA to ACCUA, and since its recent establishment, has gained widespread support among its stakeholders for the changes initiated and its enhancement plans.

Panel recommendations

1. ACCUA should swiftly proceed to the implementation of activities designed to support the universities in the move from programme accreditation to institutional accreditation.
2. As a matter of urgency, ACCUA should adopt more detailed and practical arrangements for the Governing Council to oversee the implementation of strategic plans.
3. ACCUA should hold regular meetings with students and continue building links with a wider range of social partners, outside its bodies and regular activities, as a way of promoting student involvement in quality assurance and as part of its ongoing efforts to further expand its engagement with stakeholders.

Panel suggestions for further improvement

- I. ACCUA could involve international experts in the Technical Committee or seek their inputs on an ad-hoc basis in the process of reviewing its evaluation methodologies.

Panel conclusion: compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

ACCUA was created by Law 9/2021 of 23 December 2021 which creates the Business Agency for Economic Transformation and Development (TRADE) and the Agency for Scientific and University Quality of Andalusia (ACCUA). Pursuant to the Law, the agency has legal personality and full legal capacity, its own assets and budget. The Law establishes ACCUA as the legal successor of AAC-DEVA, sets a legal framework and objectives for its activities, specifies its external QA functions, identifies its funding sources, and provides for the transfer of financial and human resources from AAC-DEVA to ACCUA. The agency was formally established with the entry into force of Decree 17/2023 of 14 February 2023 approving the Statutes of the Agency for Scientific and University Quality of Andalusia (ACCUA). As a public administrative agency, ACCUA is assigned to the ministry competent for evaluation and accreditation in higher education and operates in accordance with Law 9/2007 of 22 October 2007 on the Administration of the Regional Government of Andalusia.

Pursuant to Organic Law 2/2023 and Royal Decree 822/2021, external QA processes in Spain are conducted by ANECA and – within their territorial jurisdiction – QA agencies of the Autonomous Communities that are registered in EQAR, following an external review of their compliance with the ESG. ACCUA (as the legal successor of the agencies previously existing in Andalusia) has been listed on EQAR since 2009. Thus, outcomes of its evaluation and accreditation processes are recognised in the entire territory of Spain, and where required by the legislation, its evaluation reports provide the basis for decisions taken by the national and regional bodies and for the entry of official degrees onto the RUCT managed by the Spanish ministry responsible for higher education (see the sections “Quality Assurance” and “ACCUA’s Functions, Activities, Procedures”).

While AAC-DEVA as a business agency could and did conduct fee-based evaluations abroad (Russia), ACCUA as a public administrative agency would need to adopt complex administrative procedures and a pricing policy to do so outside its regional jurisdiction in Spain. The agency is interested to join networks and carry out evaluations in Latin America, but no specific arrangements or plans were in place at the time of the panel’s site visit. (Written pre-visit clarifications; Onsite clarification meeting)

Analysis

ACCUA’s founding documents demonstrate that it has a clear legal basis for external QA activities and operational continuity as the successor of AAC-DEVA. Where its evaluation processes serve regulatory purposes, their outcomes are recognised by both the Regional Government of Andalusia and the Spanish Government. As noted under ESG 3.1, the agency’s external QA activities have gained widespread acceptance among the regional authorities, universities, students and social partners alike.

Panel conclusion: compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Evidence

Law 9/2021 establishing ACCUA and its Statutes state that the agency performs its functions with objectivity and professionalism and in compliance with the legislation, and enjoys autonomy and independence in its activities.

Like AAC-DEVA's, ACCUA's governing bodies are the President, the position being held, by virtue of law, by the head of the ministry to which the agency is assigned (the Regional Minister), and the Governing Council. The President convenes and chairs meetings of the Council and has a casting vote as its member, and the Governing Council approves the agency's strategic plans, annual reports and staffing tables as its main responsibilities.

The AAC Governing Council (13 members) consisted of the AAC Managing Director, six representatives of the regional authorities, including the Regional Minister as the President, three academic members coming from Andalusian institutions and three entrepreneurs, as compared to six representatives of the regional authorities, including the Minister, the Director, eight representatives of the academic community (university rectors, students and experts with high prestige) and two social partners sitting on the ACCUA Governing Council (17 members). Except for the Director with some evaluation and accreditation functions, ACCUA Council members may not be involved in any external QA activities of the agency. (2019 external review report; ACCUA's Statutes). Until the time of the panel's site visit, the Governing Council took all decisions unanimously by consensus, but in the case of any disagreement, decisions would be taken by a majority vote in accordance with the regulations for governing bodies in the Regional Government of Andalusia (Online clarification meeting).

The statutory arrangements for the appointment of Council members have remained essentially the same as for ACC-DEVA. As the panel learned from the Governing Council, the rules for appointment are laid down in the regional legislation and apply to all public administrative bodies. Some government officials in the Council are members by virtue of their position; other officials, rectors, presidents of university social councils, students and experts with high prestige are appointed by the Regional Minister, but rectors and presidents of the social councils are nominated by the Andalusian Council of Universities, and students by the CASEUA (Statutes). As the President explained to the panel, there is no published call for experts with high prestige sitting on the Council, but they are selected against the criteria which include, in particular, areas of knowledge to be represented, experience in strategic planning, higher education and research, and degree programme management.

Aside from those representing the regional authorities by virtue of their position, Council members are appointed for a four-year term and can serve one subsequent term (Statutes). The Council members whom the panel met reckoned that they are bound by "incompatibility rules" (e.g. illegal action or unethical conduct) laid down in the legislation for civil servants or regional administration, but were unable to give any specific reasons for their possible dismissal.

Like ACC-DEVA's, ACCUA's Director, as its executive body, is selected through an open competition from among persons with recognised academic and research achievements who are civil servants, is proposed by the Regional Minister and appointed for an indefinite term by the Governing Council of the Regional Government of Andalusia (ACCUA's Statutes; SAR; Written pre-visit clarifications).

Selection criteria are proposed by the ACCUA Governing Council. Candidates are selected by a committee and the Government is involved only in the final stage. The criteria for the competition for the post of the ACCUA Director included the status of career civil servant in the pool of university professors or tenured scientists or scientific researchers; documented experience of at least one year in the management of a faculty or school and of an official degree programme, and in research projects and research evaluation, and documented experience of at least two years in university QA and in a management position at a public organisation. Only one candidate applied for the post. (Announcements on the competition and its outcome; Meeting with the President and the Management Team) ACCUA's Statutes state that the Director performs his/her evaluation and accreditation duties with independence and objectivity and may not receive instructions from any authority with regard to evaluation or accreditation decisions.

The Director can be dismissed by the Governing Council of the Regional Government of Andalusia. As he/she has the rank of Director General in the civil service, serious infractions providing the grounds for dismissal are specified in the national and regional legislation. These include, for example, unlawful conduct, failure to perform essential job functions or comply with transparency regulations, abuse of authority, negligence, violation of the principle of impartiality and no-conflict-of-interest, and discrimination of any kind in the exercise of functions. (Law 19/2013 on transparency, access to public information and good governance; Law 3/2005 on incompatibilities of senior officials of the Administration of the Regional Government of Andalusia; Law 9/2007 on the Administration of the Government of Andalusia; Law 1/2014 on Public Transparency of Andalusia).

As the agency explained to the panel, the appointment and dismissal arrangements in place aim to reconcile the requirement laid down by the regional legislation, whereby heads of public administrative agencies such as ACCUA are appointed and dismissed by the Regional Government, with European standards, which prompted the agency to establish in its Statutes the additional requirement for an open competition for the post of Director (Online clarification meeting).

ACCUA has legal personality and full legal capacity. It is fully funded by the Regional Government of Andalusia. Its budget is proposed by the agency's Director and approved by the Governing Council of the Regional Government of Andalusia and, subsequently, by the Andalusian Parliament (Law 9/2021; Statutes; SAR). As the agency explained in the online clarification meeting, once approved, the budget can be modified with the approval from the Regional Minister and increased with the approval of the regional authorities concerned. Approval from the Regional Government is also required to hire permanent and temporary staff. ACCUA's Initial Action Plan was endorsed by the Regional Minister in accordance with the legislation on the Regional Government of Andalusia. This is required for a new public administrative agency established by a regional law, but the next strategic plan will be autonomously adopted by the agency, following approval by its Governing Council.

The national and regional legislation lays down a framework for external QA activities (see "Quality Assurance"). Pursuant to the Law establishing ACCUA and its Statutes, the agency establishes the criteria and methodologies for its evaluation processes. Procedures, criteria and guides are proposed by the Director and approved by the Technical Committee. Aside from the Director and other agency representatives, the Committee consists of academic experts coming from Andalusian universities and students, who are appointed by the Director, after consultation with the Governing Council (for the composition, see section "ACCUA's Organisation/Structure"). The Director acknowledged to the panel that a published call for academic experts could widen choices, but in selecting them, he sought to ensure balance between areas of knowledge and home universities, international experience and academic track record, and had informal consultations with rectors (Final clarification meeting).

Except for institutional accreditation, evaluations are conducted by the evaluation committees composed of external experts coming from outside Andalusia; student members of the programme

follow-up committee may also come from Andalusian universities, but they do not participate in follow-up processes for their universities. Experts sign the Code of Ethics on appointment. The procedure for the selection and appointment of evaluators is approved by the ACCUA Governing Council. Experts for the committees are selected from the ACCUA Databank of Evaluators (see ESG 2.4) by a commission consisting of the area coordinator concerned and two ACCUA staff members, and are appointed by the Director in accordance with the principles of independence and no-conflict-of-interest. Institutional accreditation reviews are carried out by an internal committee, which consists of the Director or his/her representative and technical staff responsible for programme reaccreditation and IMPLANTA. This is because the process only formally verifies programme reaccreditation and QAS accreditation documents for their compliance with the requirements set by the legislation. (SAR; Statutes; *Selection and Appointment of Evaluators*; *Procedure for Institutional Accreditation of Public and Private Andalusian University Centres*; Evaluation guides; Meeting with students)

The area coordinators, who combine part-time work for the agency with their regular jobs at Andalusian universities or research institutions, are recruited through a public call and selected by the Director. They are not involved in evaluations and are only informed about their outcomes. (Statutes; Onsite clarification meeting; Meeting with area coordinators)

Like in AAC-DEVA, the evaluation committees produce evaluation reports which include a favourable or unfavourable outcome. Reports are checked for consistency by the Committee for Issuing Reports for a given process, composed of the Director or his/her representative, the area coordinator, the chairs and secretaries of the competent evaluation committees, a student, a professional, a technical or QA expert where appropriate, and a staff member as the secretary (see ESG 2.5 and 2.6). The Committee may not change the substance of a report produced by an evaluation committee. Evaluation reports and outcomes are binding on the Director who issues corresponding decisions on behalf of the agency. The Director does not attend meetings of the Committee for Issuing Reports where evaluation reports on the university from which he came are discussed. (SAR; Statutes; Evaluation guides; Online clarification meeting; Meeting with national experts)

ACCUA has a Service Charter, and a Code of Ethics for the Governing Council, the Director and staff, evaluators and other external experts working for the agency, including area coordinators and Technical Committee members. The documents highlight the agency's essential values and principles: independence and autonomy, impartiality and no-conflict-of-interest in the performance of evaluation and accreditation functions; competence and professional ethics; gender equality and non-discrimination; transparency; methodological innovation and continuous improvement of processes; and social responsiveness. (SAR; Service Charter and Code of Ethics: AAC-DEVA documents still in force, and pre-final versions updated for ACCUA yet to be formally adopted).

The President and Governing Council members whom the panel met consider that ACCUA is a fully independent administrative agency, with more autonomy than AAC-DEVA as it has its own budget; its independence is guaranteed by the presence of different stakeholders in the Council, including those nominated by the representative bodies of the academic community and social councils, and no involvement of the Governing Council in external evaluations. For the university rectors interviewed, the agency is completely independent and impartial in its activities and is not linked to any political parties or university governing bodies; there is a good balance between working together with the agency so that universities understand and accept how they are evaluated and respect for its autonomy in outcomes of evaluations. The external experts emphasised that the evaluation committees are independent and that their evaluation reports are final in terms of their content and outcome.

Analysis

Organisational independence

ACCUA's independence is guaranteed by the legislation. The agency is perceived as fully independent by all of the stakeholders, and the panel found no evidence of a stakeholder seeking to exert undue influence through their involvement in the agency's governance.

Compared to AAC-DEVA, the relative proportions of stakeholder groups in the composition of the ACCUA Governing Council have changed in favour of representatives of the academic community. The panel believes that with consensus- or majority-based decision making, there is now a fair balance of power in the Council, even though the Minister has a casting vote in the case of a tied vote.

The panel confirms that there has been no substantial change in the procedures for the appointment of governing bodies as compared to those in place for DEVA. The arrangements whereby the Minister is a single-person and highest-level authority, appoints Governing Council members and is involved in the appointment of the Director might arouse some concern. However, the panel understands that these are standard requirements for all public administrative agencies in Andalusia and, as such, are not perceived by the stakeholders as posing a risk to ACCUA's independence. Furthermore, aside from having a cast vote, the Minister's exclusive governing powers are limited to convening and chairing Council meetings. The Minister's powers in the appointment of Council members are limited insofar as some government officials are members by virtue of law, and rectors, students and social partners are nominated by their representative bodies. Since academic experts with high prestige are selected solely by the Minister, a public call or consultations with stakeholders could provide further safeguards for impartiality.

As regards the appointment of the Director, the panel believes that a public call for candidates, clear criteria agreed with the agency's Governing Council and the involvement of a selection committee are adequate mechanisms to prevent the Minister or Regional Government officials from taking a decision driven by any illegitimate interest even if they wished to do so.

The national and regional legislation clearly sets out sound reasons for possible dismissal of the Director by the Regional Government. However, none of the documents provided to the panel, including the legislative acts and the Code of Ethics (the version for AAC-DEVA still in force or the new draft) specifies possible grounds for the dismissal of Governing Council members before the end of their term of office. It was not clear to the members interviewed whether they could be dismissed and if so, on what grounds, and how the Code of Ethics would apply in such cases. This is not a major issue as members of the Council could hardly promote interests of their institutions since the responsibilities of this body are limited to strategic planning and oversight. Nevertheless, the agency would need to clarify this aspect and address it in its internal documents.

As a key element guaranteeing ACCUA's independence, the Governing Council is clearly separated in the organisational structure from the committees conducting evaluations. Furthermore, while the Director consults the Council about candidates for expert members of the Technical Committee approving evaluation methodologies, neither the Council nor the Committee has influence on the conduct or outcomes of evaluations.

The Director is the only link between governance and external QA activities as in addition to being a Council member and having management functions, he/she appoints experts involved in external QA activities (members of the Technical Committee and the evaluation committees, and area coordinators) and issues evaluation decisions. However, should he/she wished to do so, it is unlikely that the Director could use his/her position as leverage since he/she shares the powers with the Governing Council and a selection committee in the appointment of some Technical Committee members and the evaluation committees, respectively; decisions of the evaluation committees are binding upon the Director and,

thus, his/her role is limited to formal endorsement of evaluation outcomes. There are also stringent rules on impartiality in the national and regional legislation that are applicable to the Director as a civil servant and clear rules on his/her impartiality in evaluation and accreditation activities in ACCUA's Statutes.

Operational independence

The panel agrees with the stakeholders that the new status of the agency has increased its financial autonomy as it now has its own budget to cover all of its operating costs, whereas DEVA managed only the funding for evaluation activities, and any other expenses, related, for example, to development activities, would have had to be approved by the AAC (see "ACCUA's Funding" and ESG 3.5). ACCUA relies entirely on the regional government funding. This does not appear to limit its independence since, as noted under ESG 3.5, the agency has always received the full budget requested, and the panel found in its meeting with the President that there is wide support in the Regional Parliament to provide it with the funding it needs. While, ideally, it could seek some funding from other sources, ACCUA as a public administrative agency would need to adopt complicated procedures to do so (see ESG 3.5), and the panel believes that there are more urgent priorities for the coming years in the Initial Action Plan (see ESG 3.1). However, the requirement to obtain approval from the Regional Government to hire both temporary and permanent staff limits to some extent the agency's operational autonomy.

The national legislation places some constraints on the agency's autonomy in external QA activities (see the section "Quality Assurance"). However, within this framework, ACCUA's founding documents and internal procedures clearly demonstrate that it is fully independent in developing its evaluation methodologies, and in appointing experts to the Technical Committee and the evaluation committees involved in external QA activities. As noted above, there is a clear separation between the bodies responsible for governance and external QA activities, and no third party is involved in the selection of experts or the development of methodologies. The area coordinators, who come from Andalusian universities, are involved in the selection of experts for the evaluation committees; however, it is unlikely that should they wish to do so, they could serve interests of their home institutions as the selection process also involves agency staff and appointment decisions are taken by the Director.

Independence of formal outcomes

The Code of Ethics signed by external evaluators, and the arrangements whereby members of the evaluation committees (except students of the programme follow-up committee) come from outside Andalusia, the Committee Issuing Reports may not change the substance of evaluation reports and outcomes are binding upon the Director, provide effective safeguards against undue influence of third parties on findings or conclusions from evaluations. The panel also gathers from its meeting with national experts that the rule of non-interference from the Director with evaluation outcomes is strictly adhered to in all processes. At the same time, as evaluation decisions are formally issued by the Director, the final responsibility for outcomes lies with the agency.

Although institutional accreditation reviews are carried out by the committee consisting of the Director or his/her representative and staff, it is clear to the panel from the review criteria and a sample of the agency's review reports examined that the committee only checks the correctness of QAS accreditation and programme reaccreditation documents. Thus, neither the Director nor staff could have real influence the final outcome of a review.

Panel recommendations

- I. ACCUA should include in its internal regulations clear provisions for possible dismissal of members of its Governing Council before the end of their term of office.

2. To provide further safeguards for impartiality, ACCUA could propose to the Regional Minister that experts with high prestige are selected for the Governing Council through a public call or in consultation with the stakeholders.

Panel conclusion: compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

2019 review recommendations: (1) The review panel suggests that immediate steps be taken to start a programme of thematic analysis through the use of project funding and in association with the universities of the system. (2) The review panel would like to see a thematic analysis of reports conducted and published. Such a thematic approach should *inter alia* address regional priorities.

Evidence

To carry out the 2019 review recommendations, the agency has established a unit for statistical analysis with specialised staff and produced and published on its website the following thematic reports: (1) *Academic Integrity in Andalusian Public Universities: Regulatory Framework and Proposed Actions* (2022); (2) *Thematic Study on the Employment Outcome of Graduates from the Nursing Degree in Andalusia* (2022); (3) *Thematic Study on the Employment Outcome of Graduates from the Tourism Degree in Andalusia* (2022); (4) *DEVA-AAC Proposals for a Reform of the University Teaching Staff Accreditation System* (2022); and (5) *Report on the Adaptation of Andalusian University Degrees to the COVID-19 Pandemic* (2023).

The panel has read all five thematic reports. The *Report on the Adaptation of Andalusian University Degrees to the COVID-19 Pandemic*, based on documentary evidence collected from, and a survey conducted among the Andalusian universities, reviews measures taken by the universities and the agency to reduce adverse impacts of the pandemic on degree programmes. The report on *Academic Integrity* analyses literature, national and institutional regulatory frameworks, and approaches and instruments adopted in selected Andalusian universities, and proposes actions that could be taken by universities and the agency to promote academic integrity. The two *Studies on the Employment Outcome*, based mainly on data from the Integrated University Information System, provide an in-depth analysis of the supply of, and demand for student places, student enrolment, the structure of degree programmes, student academic performance indicators, retention, dropout, graduation and graduate employment rates. The conclusions indicate where the balance between supply and demand for places could be improved, and identify constraints for the provision and areas for improvement of programmes. The report *Proposals for a Reform of the University Teaching Staff Accreditation System* provides general observations on the rationale behind, and possible improvements in the teaching staff accreditation processes, which fall outside the scope of the ESG.

The SAR states that topics for thematic reports may be proposed by the Governing Council, the Technical Committee and the Director, taking into consideration the strategic interests of the Andalusian University System and feedback from the agency's stakeholders. The topics for the reports produced so far were agreed within REACU or suggested by the agency's bodies. Some inputs on topics were collected at the online seminars for stakeholders co-organised by the agency (see ESG 3.1). The reports were prepared by working groups of the DEVA Technical Committee and the technical staff of the agency specialising in statistical analysis, who have been transferred to ACCUA.

The ESG 3.4 section of the SAR also mentions reports on results of the agency's evaluation processes and annual activity reports, all of which are published on the ACCUA website.

As the panel learned from the QA Commission, thematic reports produced in the previous years were intended for universities and the general public rather than as a source of evidence that could lead to improvements in the agency's activities. The SAR states that the reports were welcome by the universities and acknowledges that ACCUA needs to expand its activities in this area. The two reports on graduate employment were particularly useful for the social partners interviewed by the panel. The representatives of university rectors consider that the agency should prepare more thematic reports and can and would feel free to suggest some topics (e.g. employment, inclusion, micro-credentials).

Dissemination of information on results of activities is part of the strategic line *Communication and Enhancement* of ACCUA's Initial Action Plan, and the 2024 Annual Action Plan includes thematic studies to disseminate information on the impact of external QA activities. At the time of the panel's visit, topics for thematic reports to be produced in 2024 were not defined yet, and the agency was analysing data collected in the previous years and collecting data from stakeholders (Online clarification meeting; Meeting with the QA Commission).

Analysis

The agency has made progress in carrying forward the 2019 review recommendations with the creation of a statistical analysis unit and the production of several thematic reports. It is also clear to the panel that ACCUA has sufficient resources for thematic analyses to be conducted on a regular basis (see also ESG 3.5).

The first four thematic reports provide useful inputs for policy debates with regional stakeholders and for improvements in QA at universities. However, while the agency invested a considerable extra effort to collect data for the reports from various external sources, ESG 3.4 states that agencies should regularly publish reports that describe and analyse the general findings of their external QA activities. Thus, ACCUA would need to reconsider its concept of thematic analysis and use mainly its own numerous evaluation reports to produce thematic studies. Its evaluation reports contain a wealth of information that can be used to identify trends, good practice examples and common issues, as expected under this standard. Evidence gathered from reports would also indicate areas or criteria to which more consideration may need to be given in evaluations; this would be particularly helpful for ACCUA in the ongoing review of its evaluation methodologies or its training sessions for the evaluation committees.

Annual Reports contain a detailed description of the agency's activities and procedures, including statistics on the evaluation processes, and Reports on Results analyse findings from satisfaction surveys of universities and evaluators on training sessions and / or evaluation processes. However, except one of the most recent reports, which includes a short list of areas for improvement in degree programmes, they do not provide any analysis of trends in the university system; thus they cannot be considered as examples of thematic analysis as defined in this standard.

It is promising that thematic studies are included in ACCUA's Annual Action Plan, but no specific arrangements for those to be produced in 2024 had been made by the time of the panel's visit and topics had yet to be defined. While topics have so far been agreed within REACU or chosen by the agency's bodies, the panel believes that all of ACCUA's stakeholder groups outside its bodies should also be given an opportunity to suggest areas or topics to be addressed. Thematic reports do not necessarily have to focus on a specific topic such as academic integrity, but may also provide a broader overview of trends, good practice examples and recurring issues, based on, for example, a representative sample of degree programme evaluation or QAS accreditation reports.

In the discussions with the panel, the agency tended to emphasise the importance of expertise in statistical analysis in the context of prospective thematic reports. Analyses of evaluation reports would

also benefit from academic and QA expertise, available, for example, in the Technical Committee and vast experience in evaluations of its technical officers transferred from DEVA.

Panel recommendations

- I. ACCUA should devise clear annual plans for thematic studies, consult stakeholders outside its bodies to define their topics, and use its evaluation reports to produce thematic studies.

Panel suggestions for further improvement

- I. ACCUA could create teams composed of academic and QA experts, data analysts and staff to collect and analyse evidence from evaluation reports for thematic studies.

Panel conclusion: partially compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2019 review recommendation: The agency should review its organisational structure and its deployment of resources and make what changes are required to provide for consistent strategic planning and implementation and review of that strategy.

Evidence

The evidence concerning ACCUA's organisational structure, strategic planning and oversight is provided in the section on ESG 3.1. ACCUA is fully funded by the Regional Government of Andalusia. Its budget is approved by the Governing Council of the Regional Government of Andalusia and, subsequently, by the Andalusian Parliament. Sources of its income may also include, for example, subsidies or budgetary allocations from any other public or private entity; fees for evaluation and accreditation services; voluntary contributions, grants, donations and legacies (Statutes; SAR). To charge fees for its evaluation and accreditation, ACCUA as an administrative agency would be required to adopt such a strategic decision and complicated procedures (Written pre-visit clarifications).

Since DEVA was part of the AAC between 2019 and early 2023 and various operating costs were shared across the organisation, external QA activities are the only item that could be extracted for DEVA from the total AAC budgets. Between 2019 and 2023, the budgeted amounts exceeded the actual expenses; the surplus varied from 5.4% to 41.4% depending on the number of applications received and the costs of evaluations. The budget allocated to ACCUA increased by 3.7% from €3,808,242 in 2023 to €3,947,580 in 2024. The main expenditure items are staff salaries (60% in 2023 and 62% in 2024) and external QA activities (38% and 36%, respectively). (SAR; Written pre-visit clarifications)

As the Minister (ACCUA President) and the Management Team explained to the panel, ACCUA was established and its budget (as part of the Regional Government budget) was approved by an absolute majority in the Regional Parliament. If more funding is needed, the Minister pledged to consider favourably such requests. On the one hand, additional resources may be needed in the future to expand the agency's international activities, in particular, in Latin America, and to evaluate new programmes to be developed in accordance with the recently enacted legislation and more international joint programmes. On the other hand, the agency is now working to support universities

in the move from programme to institutional accreditation and increase the number of institutionally accredited centres, which will allow it to use more efficiently its financial and human resources.

The SAR states that the agency had sufficient financial resources to conduct its external QA activities in all previous years and currently has enough staff to achieve its objectives and tackle future challenges. At the end of the 2023 fiscal year, ACCUA had 44 full-time staff, compared to 22 full-time staff and AAC staff providing horizontal services on a part-time basis at the time of the previous review. The number of staff increased as in addition to the DEVA staff working in the evaluation and accreditation areas, some of the AAC staff providing horizontal services (statistics, communication, IT, archive, finance and contracting) were transferred to ACCUA. The team consists of the Director, 35 agency staff and 8 staff who have the status of civil servants of the Regional Government of Andalusia; 78% of the staff hold a university degree. Staff may work from home one day a week as the agency has provided them with laptops and adapted its IT systems for remote work.

The technical staff whom the panel met support the evaluation committees and were also involved in the collection and analysis of data for thematic reports. They are satisfied with their jobs as the working hours provide a good work-life balance, the colleagues support each other in peak workload periods, and they offer a service to the public and see results of their work. Promotion opportunities were limited in DEVA, and the staff expect that this might change in ACCUA. Training opportunities have recently been limited due to the transition from AAC-DEVA to ACCUA. However, staff training is included in the 2024 Action Plan, a survey of training needs had been conducted and a catalogue of courses for staff was being developed at the time of the panel's visit. The representatives of the universities interviewed, complimented the staff for their dedication and professionalism.

The agency also has five coordinators of the functional evaluation and accreditation areas who work as external experts on a part-time basis, while holding academic posts at their home institutions. The SAR explains that this allows the agency to benefit from a wide range of expertise in higher education, research and QA. The coordinators told the panel that the workload is heavy, but they work as a team and support each other, and are able to reconcile their coordinating duties at ACCUA with academic duties at their home institutions.

Analysis

See the section on ESG 3.1 for the panel's comments that are relevant to the part of the 2019 review recommendation under this standard insofar as it refers to the organisational structure of the agency. With regard to resources, ACCUA followed the 2019 review recommendation in its strategic and annual planning. The Initial Action Plan takes into consideration the 2023 and 2024 budgets and possible variations in the level of necessary funding due to varying numbers of evaluation applications to be submitted, and the human resources available in 2023 (with an overview of the resources included as an integral part of the Plan). The 2024 Annual Action Plan clearly assigns responsibility for activities leading to the achievement of the strategic objectives to specific areas or units in the agency.

Considering the slightly bigger budget and the increased number of staff, the panel believes that ACCUA currently has sufficient resources to conduct both its core QA activities and the enhancement-oriented activities included in the Action Plans. As there is firm support for the agency's work across the political parties in the Parliament, there are, likewise, good prospects for its financial stability in the future. Although approval from the Regional Government is required to hire new staff (see ESG 3.3), the panel understands that there is good will in the Ministry to accommodate such requests. The panel also agrees with agency that the shift from programme to institutional accreditation in the coming years will enable a more efficient use of resources; it will also free up resources which can be used for any activities prioritised by the agency.

The transfer of staff from AAC-DEVA to ACCUA and the experience in QA that the technical officers had gained over the years was crucial to ensure continuity of the agency’s activities (see ESG 3.1). The panel was impressed by the commitment of the staff and the area coordinators and their sense of responsibility for the agency’s ongoing activities and for how it will be developing in the future. While staff development was largely neglected during the transition period, the panel gathers from the meeting with the staff that – like in the case of other activities included in the 2024 Action Plan and initiated (see ESG 3.1) – the preparatory work to expand training opportunities has already been done.

Panel commendations

- I. The commitment and professionalism of the staff and area coordinators are a valuable asset for ACCUA in moving ahead with its enhancement plans.

Panel conclusion: compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

2019 review recommendation: A rigorous and continuous programme of internal quality assurance needs to be embedded in the agency and used as an exemplar throughout the system.

Evidence

The SAR states that the development of an internal QA system was hindered in 2021 by the initiation of the process to separate DEVA from AAC and the establishment of ACCUA. However, since the previous review, the agency has set up a QA Commission; revised and implemented the AAC-DEVA Service Charter; reviewed its QA documents; adopted a procedure and created a mailbox for complaints and suggestions (see ESG 2.7); approved a Process Map; conducted a SWOT analysis, and analysed actions and defined indicators for the Initial Action Plan and the 2024 Action Plan; produced annual reports on appeals, complaints and suggestions and on results of the evaluation processes.

One of the objectives as part of the strategic line *Strategic Governance and Quality* in the Initial Action Plan is to promote the development of a quality culture in all areas of the agency’s activity. In its 2024 Annual Action Plan, ACCUA aims to implement, within four years, an internal system covering all actions designed to promote, improve and disseminate information about its QA activities, and to establish efficient systems for internal and external feedback collection.

The SAR states that the key documents for the agency’s internal QA include the Initial Action Plan; the Service Charter and the Code of Ethics, and the Quality Manual, with a QA policy and general guidelines. However, at the time of the panel’s visit, the AAC-DEVA Service Charter and Code of Ethics updated for ACCUA had yet to be approved (with the versions for AAC-DEVA still in force), and the Process Map and the Quality Manual were being revised to integrate all processes (Online clarification meeting; Meeting with the QA Commission).

The Director oversees the implementation of the internal QA system. The QA Commission, composed of staff from different areas of the agency’s activity, acts as an advisory group for the Director. It develops and revises internal QA procedures and ensures that those working in and for the agency are familiar with them; analyses processes and proposes improvements; monitors the implementation

of the Initial Action Plan and the 2024 Annual Plan in monthly meetings; and reviews annually the agency's QA system and activities. (SAR; Meeting with the QA Commission)

The main mechanisms for external feedback collection are satisfaction surveys of evaluators and universities on the training sessions and the evaluation processes; regular meetings of the Director and the area coordinators with universities; messages received via the mailbox for complaints and suggestions and satisfaction surveys of institutions or individuals who have filed complaints and suggestions (see ESG 2.7); and participation of ACCUA staff in REACU meetings. Satisfaction surveys of evaluators and evaluated universities are conducted after each round of evaluations and findings from meta-evaluations are published in annual reports on results. (SAR; Reports on results)

The representatives of the universities and students told the panel that the agency is receptive to their feedback and the improvements it makes are visible. Based on the findings from surveys, the agency has, for example, improved its internal organisation; put in place an IT system for evaluation applications and upgraded its IT system for evaluation management; revised its working documents (e.g. guidelines and questionnaires for evaluators) and guides for the evaluation processes; improved the organisation of site visits (e.g. more time for interviews); and included new members in the evaluation committees. (SAR; Reports on results) The rectors were particularly glad that they could discuss training needs of their universities and agree on the schedule for the implementation of IMPLANTA, as a step towards institutional accreditation, during the Director's recent tour of the universities (see ESG 3.1).

Internal feedback is collected in meetings. The Governing Council meets at least twice a year. The SAR mentions regular meetings of the Director and the Technical Committee to discuss activities as an internal QA mechanism, but the Technical Committee was appointed shortly before the panel's visit and thus working arrangements had yet to be agreed. The area coordinators meet with the Director every week, and staff can make suggestions to the area coordinators on an ongoing basis and can also speak to the Director. (Meetings with the internal stakeholders)

The evaluation committees receive training and guides (see ESG 2.4). Their performance is assessed by the area coordinators and the staff coordinating evaluations who ask the committee chairs for oral feedback, and by the peer evaluators through a survey. The agency uses their feedback to review the committee membership rosters and select new members. (SAR; *Selection and Appointment of Evaluators*; Meetings with area coordinators, staff and national evaluators) Except for the committee chairs, the national evaluators interviewed did not receive feedback on their performance; there is a sort of self-assessment as they compare their performance with that of other committee members.

The QA Commission and the staff told the panel that aside from the regional regulations applicable to civil servants, there is no formal performance appraisal procedure for the area coordinators or staff. Universities assess staff and the management of an evaluation process in post-evaluation surveys; the QA Commission analyses findings and proposes improvements if issues are detected. As the coordinators explained to the panel, the Director provides oral feedback to them in weekly meetings, and there is a sort of self-assessment as the coordinators work together and are in touch with other agencies and see how they do things.

There has been no case of a breach of the Code of Ethics by the area coordinators or staff, but one expert has been struck off from the Databank of Evaluators for ethical misconduct (Meeting with the QA Commission; Final clarification meeting).

Internal QA of the work performed by other agencies

ACCUA does not subcontract any of its external QA or other activities. However, pursuant to Royal Decree 822/2021, Spanish agencies can recognise an evaluation report and the outcome of an evaluation of an international joint programme if the country of the coordinating institution has adopted the *European Approach for Quality Assurance of Joint Programmes*, the partner institutions have applied for an

evaluation based on the *European Approach*, and the agency that has conducted the evaluation is listed on EQAR.

In accordance with ACCUA's *Guide for the Evaluation of International Joint Programmes within the European Approach Framework for Quality Assurance*, the participating Andalusian university submits to ACCUA information on the consortium and the QA agency responsible for evaluation, and the evaluation report. The report should include an assessment of the compliance with the *European Approach* and an overall evaluation of the joint programme. ACCUA reviews the documents and issues a report on the recognition of the evaluation outcome, including a decision on the number of ECTS credits varying from that set in the Spanish legislation. If the outcome of ACCUA's review is favourable, the Council of Universities takes an accreditation decision, and the programme is entered onto the RUCT and the degree to be awarded is recognised in Spain.

In 2023, ACCUA recognised a report on the Bachelor's Degree Programme in European Transcultural Studies: Languages, Cultures, and Interactions, which will be offered by the University of Malaga, Universität Flensburg (Germany), and Université de Strasbourg (France), and which had been evaluated by the Agency for Quality Assurance through Accreditation of Study Programs (AQAS) in Germany.

Analysis

The QA Commission set up, the Initial and Annual Action Plans based on a review of the agency's activities and various internal documents and procedures revised or adopted are all indicative of the considerable effort that the agency has made to implement the 2019 recommendation despite the hectic transition period. The Action Plans also show that ACCUA is well aware that there is still room for improvement in internal QA, and it was clear to the panel during the site visit that the QA Commission was working hard to put in a place a coherent and effective system. At the same time, since the Process Map and the Quality Manual were still being updated for ACCUA, it was too early to see how various elements could fit and work together. It is reassuring, however, that mechanisms for an annual review of the QA system and monthly and annual reviews of the agency's activities by the QA Commission are already in place.

The panel gathers from its interviews with the internal stakeholders that they are satisfied with opportunities to provide their feedback, and, in its view, regular meetings are sufficient to do so. As noted under ESG 3.1, the agency's new Management encourages and is receptive to feedback. The panel had access to minutes of meetings of the AAC-DEVA and ACCUA Governing Councils and the AAC-DEVA Technical Committee and can confirm that key points of discussions are documented. However, feedback is collected from, and given to the staff and the area coordinators in a largely informal way. Thus, it would be difficult to track follow-up action on any improvements suggested.

Post-evaluation satisfaction surveys of universities and evaluators are a well-established mechanism for external feedback collection. The SAR, the annual reports on results and the panel's discussions with the representatives of universities provide evidence that findings are analysed and used to make improvements. Annual reports on results, which are all published on the ACCUA website, analyse results of satisfaction surveys and describe proposed improvements. They could, however, provide or prompt more in-depth reflection on findings, for example, on reasons behind lower ratings given by universities in a survey for some aspects of the evaluation processes. Improvements made in response to survey findings in a given year could be described in a subsequent report or documented elsewhere.

As noted under ESG 3.5, although training opportunities have recently been limited, the staff can rely on their long experience and are valued for their professionalism by the universities, evaluators receive training and guidelines (see ESG 2.4), and the agency acts in cases of ethical misconduct. However, clear performance appraisal mechanisms for the staff and the area coordinators are not yet in place,

and those for evaluators that are currently in place are largely informal, with no written records on outcomes and no feedback given to those whose performance is assessed.

To recognise evaluation reports on international joint programmes produced by other agencies, ACCUA checks compliance with the formal requirements set in the national legislation. In the panel's view, there is no need for any more in-depth review of such reports as part of ACCUA's internal QA since EQAR registration confirms that an agency conducts external QA activities in accordance with the ESG.

Although this is not a major issue, some sections of the ACCUA website and various published documents refer to AAC-DEVA; it is not clear to the user whether they are still valid. While key internal QA documents (even if some are being updated) are published, the website does not provide clear and concise information on how the internal QA system works.

Panel commendations

1. ACCUA invests great effort to compile and process data and publish findings from satisfaction surveys to demonstrate its accountability to the stakeholders.

Panel recommendations

1. ACCUA should put in place formal performance appraisal procedures for staff, area coordinators and external evaluators.
2. ACCUA should establish a practice of documenting and tracking internal feedback.

Panel suggestions for further improvement

1. ACCUA could use findings from its satisfaction surveys for a more in-depth self-analysis and consistently document all improvements made.
2. In addition to the QA documents already available, ACCUA could publish on its website a brief description of its internal QA system.

Panel conclusion: compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

Pursuant to Organic Law 2/2023 and Royal Decree 822/2021, QA bodies authorised to conduct external evaluations in Spain are ANECA and, within their territorial jurisdiction, the QA agencies of the Autonomous Communities that are registered in EQAR, following a successful review of their compliance with the ESG. ACCUA's legal predecessors (AGAE and AAC-DEVA) underwent ESG-compliance reviews in 2009, 2014 and 2019. As a result, the agency has been listed on EQAR since 2009. The present review is conducted as part of ACCUA's application for the renewal of its ENQA membership and its registration on EQAR.

Analysis

The previous and present ESG-compliance reviews demonstrate that ACCUA and its predecessors have complied with this standard over the years. EQAR registration as a precondition for Spanish QA agencies to conduct external QA activities provides an external incentive to undergo cyclical reviews. Regardless of this, the ESG feature as a point of reference in the key documents underpinning ACCUA's activities, and the panel found during the site visit that the agency is open to suggestions that may help it improve its activities. The enhancement-oriented Initial Action Plan and 2024 Annual Action Plan are clearly based on a self-critical analysis geared towards ESG-compliance, and the panel found evidence that there is firm commitment across ACCUA to put its plans into action.

The agency has implemented the 2019 review recommendations regarding the adoption of a strategic plan and the revision of the organisational structure (ESG 3.1 and 3.5), wider stakeholder engagement (ESG 3.1 and 2.2), and the adoption of a procedure for complaints (ESG 2.7). It has been struggling to carry forward the 2014 and 2019 review recommendations on thematic analysis (ESG 3.4) and internal QA (ESG 3.6), and this report echoes the concerns of the previous panels about the progress that still needs to be made to establish the practice of publishing thematic reports based on general findings from external QA activities. As regards internal QA, the panel recognises that efforts have recently been hampered by the transition from AAC-DEVA to ACCUA, and believes that the work on the key documents that would set a framework for internal QA can be completed, and other improvements recommended in this report can be made, by the time of the submission of the next progress report to ENQA.

The agency has taken up the 2019 review panel's suggestions insofar as it has continued its practice of simplifying evaluation procedures, has recently expanded and is planning to expand further its pool of international experts, and is currently developing a plan to better communicate its work to a wider audience. While professionals are now members of the evaluation committees where appropriate, still relatively few of them have a professional background outside the higher education or research sector. The previous panel also suggested that the agency could shift the focus in its evaluation reports more towards a positive tone and specific recommendations for enhancement. Recent reports provide enhancement-oriented recommendations, and have led to quality improvements in all areas of activity of universities, but this panel reiterates that suggestion insofar as reports could provide good practice examples alongside recommendations.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

Evidence

Since the 2019 review, the agency has reviewed its evaluation activities against Part I of the ESG to support universities in improving their internal QA systems and taking on greater responsibility for quality, updated its guides for the ongoing evaluation processes in line with the new legislation, and

adopted guides and criteria for the new processes (IMPLANTA/QAS accreditation; institutional accreditation; evaluations of PARS and international joint programmes).

ACCUA has specific sets of criteria for the following processes: verification and reaccreditation of programmes; evaluation of PARS; evaluation of international joint programmes based on the *European Approach for Quality Assurance of Joint Programmes*; IMPLANTA; reviews of universities for recognition; DOCENTIA/teaching activity evaluation; and accreditation of foreign language skills. Substantial modifications in programmes are evaluated against the criteria for verification. The programme follow-up focuses on areas for improvement identified in the verification and, where applicable, modification processes, and in reviewing the progress made, considers the criteria for programme reaccreditation. There are no specific criteria for institutional accreditation as this process only reviews documents for QAS accreditation and programme reaccreditation for compliance with the legal requirements; compliance with Part I of the ESG would have been assessed as part of IMPLANTA and programme reaccreditation. (SAR; Guides and protocols for the evaluation and accreditation processes).

The SAR provides a table (see below) mapping ACCUA's evaluation criteria onto Part I of the ESG for all processes except for the evaluation of PARS, and a brief analysis of how the ESG are addressed. The evaluation of PARS is not included in the table as this process is not aimed at assessing the effectiveness of internal QA. The criteria for PARS are listed in the panel's analysis, based on the agency's protocol for this process.

The SAR also explains that some of the Part I standards are not directly relevant to the review of universities for recognition and the accreditation of foreign language skills as the former addresses the creation of institutions rather than the design of programmes, and the latter focuses on institutional procedures for the certification of students' foreign language skills.

SAR: Alignment of ACUA's evaluation criteria with Part I of the ESG

ESG 2015	ACCUA REVIEW ACTIVITIES								
	EX-ANTE VERIFICATION/MODIFICATION	FOLLOW-UP/MONITORING	EX-POST RE-ACCREDITATION	EUROPEAN APPROACH	DOCENTIA	IMPLANTA	INSTITUTIONAL ACCREDITATION	REVIEW OF UNIVERSITIES FOR RECOGNITION	ACCREDITATION OF FOREIGN LANGUAGE SKILLS
1.1 Policy for quality assurance	9. Internal Quality Assurance System	2. Quality Assurance System.	2. Quality Assurance System	9. Quality assurance	1. Strategic Dimension of Teaching Evaluation	2. Quality assurance policy	Not applicable at this stage, but when the IQAS is certified.	II. A. 5. Quality assurance system	Not applicable
1.2 Design and approval of programmes	1. Description, educational objectives, and justification of the degree 2. Results of the training and learning process	3. Design, organization, and development of the training programme	3. Design, organization, and development of the training programme	2. Learning outcomes. 3. Curriculum	Not applicable	2. Quality assurance policy	Not applicable at this stage, but when the IQAS is certified.	II. A. 5. Quality assurance system	Not applicable
1.3. Student-centred learning, teaching and assessment	4. Degree planning.	4. Learning outcomes.	4. Learning outcomes	5. Learning, teaching and assessment	2. Methodological Dimension of Teaching Evaluation	5. Learning resources and student support	Not applicable at this stage, but when the IQAS is certified.	Not applicable	2. Characteristics of the proficiency exam: content, structure, and evaluation criteria for the exams
1.4. Student admission, progression, recognition, and certification	4. Admission, recognition, and mobility	3. Design, organization, and development of the training programme	3. Design, organization, and development of the training programme	4. Admission and recognition	Not applicable	6. Management of teaching and learning processes	Not applicable at this stage, but when the IQAS is certified.	II. B. 1.- Access and admission (number of students, ratios)	3. Exam delivery. Exam reappeal process. 5. Certificates
1.5 Teaching staff	5. Academic and teaching support staff	4. Teaching staff	4. Teaching staff	7. Resources	All dimensions	4. Academic staff	Not applicable at this stage, but when the IQAS is certified.	IV. Academic staff	6. Suitability of examiners

ESG 2015	ACCUA REVIEW ACTIVITIES								
	EX-ANTE VERIFICATION / MODIFICATION*	FOLLOW UP/ MONITORING	EX-POST RE-ACCREDITATION	EUROPEAN APPROACH	DOCENTIA	IMPLANTA	INSTITUTIONAL ACCREDITATION	REVIEW OF UNIVERSITIES FOR RECOGNITION	ACCREDITATION OF FOREIGN LANGUAGE SKILLS
1.6 Learning resources and student support	6. Learning resources: materials and infrastructure, internships, and Services	5. Resources and teaching support	5. Resources and teaching support	6. Student support. 7. Resources	2. Methodological Dimension of Teaching Evaluation	5. Learning resources and student support	Not applicable at this stage, but when the IQAS is certified.	VI: Facilities	Not applicable.
1.7 Information management	9. Internal Quality Assurance System	2. Quality Assurance System	2. Quality Assurance System	9. Quality assurance	1. Strategic Dimension of Teaching Evaluation. 3. Results dimension of teaching evaluation	2. Quality assurance policy	Not applicable at this stage, but when the IQAS is certified.	Not applicable	1. Contextual characteristics of the model 3. Administration of exams
1.8 Public information	9. Internal Quality Assurance System	1. Publicly available information	1. Publicly available information	9. Quality assurance	1. Strategic Dimension of Teaching Evaluation. 3. Results dimension of teaching Evaluation	1. Public information	Not applicable at this stage, but when the IQAS is certified.	Not applicable	1. Contextual characteristics of the model 3. Administration of exams
1.9 On-going monitoring and periodic review of programmes	9. Internal Quality Assurance System	6. Results of the training programme	6. Results of the training programme	9. Quality assurance	3. Results dimension of teaching evaluation	3. Design, monitoring, and improvement of training Programmes	Not applicable at this stage, but when the IQAS is certified.	Not applicable	7. Review, improvement, and staff responsible for the procedure.
1.10 Cyclic external quality assurance	9. Internal Quality Assurance System	Follow-up after three years of the implementation of the degree for renewal of accreditation	Renewal of accreditation every 6/8 years for Bachelor's, Master's, and Doctoral Programmes.	9. Quality assurance	Accreditation renewal every 5 years	2. Quality assurance policy. Certification renewal every 5 years	Certification renewal every 6 years.	Not applicable	7. Review, improvement, and staff responsible for the procedure. Certification renewal every 4 years

*Standards for Bachelor's and Master programmes. The standards for doctoral programmes include some which are specific to this level of study and thus have different reference numbers.

Analysis

The panel analysed ACCUA's evaluation criteria and a sample of reports for each evaluation process to see how they address the standards of Part I of the ESG and the effectiveness of internal QA.

ACCUA's criteria follow the legislation for all of the evaluation processes that are regulated at the national and / or regional level (programme evaluations, IMPLANTA, institutional accreditation and review of universities for recognition).

The criteria for mandatory programme verification (and substantial modification as based on the same criteria) and reaccreditation and for IMPLANTA as a voluntary process are considered jointly below as favourable outcomes of programme reaccreditation and IMPLANTA reviews are prerequisites for institutional accreditation. The panel also notes that ACCUA's criteria for reaccreditation of PhD programmes differ from those for Bachelor's and Master's degree programmes only insofar as they address some specific elements (e.g. procedures for the presentation and defence of PhD theses and the assignment of tutors and supervisors; requirements for academic staff regarding research experience and achievements; research facilities for students). There are also specific additional criteria for hybrid and e-learning (e.g. qualification requirements for staff; student support).

ACCUA's criteria for **programme evaluations** and **IMPLANTA** cover a published QA policy and procedures, and internal and external stakeholder involvement in QA (ESG 1.1), with the emphasis placed on procedures being geared towards continuous improvement of programmes or activities.

Programme evaluations and IMPLANTA address procedures for the design, approval, monitoring and periodic review of programmes (ESG 1.2 and 1.9). Verification looks in detail at how a programme is designed to achieve its objectives, how intended learning outcomes (LOs) are defined, and at the degree as linked to the National and European Qualification Frameworks. Programme reaccreditation focuses more on the consistency between the design, including any modifications introduced, and the implementation of a programme and achieved results, and on the collection and analysis of data on programme performance and follow-up action taken. IMPLANTA addresses ESG 1.2 and 1.9 in broader terms, assessing whether an IQAS allows a centre to follow cycles of continuous improvement in programmes – from programme design to periodic review.

Student-centred learning, teaching and assessment (ESG 1.3) are incorporated in the programme verification and reaccreditation criteria that assess whether a programme enables students to achieve intended LOs, learning and teaching methods are tailored to diverse needs of students, and training methodologies and assessment systems are adequate for verifying achieved LOs. IMPLANTA looks more broadly at these aspects as part of the management and results of teaching and learning processes, focusing on the analysis of the relevance of teaching and learning processes and assessment systems and their effectiveness in developing new and revising existing methodologies.

Programme verification focuses on student admission, and on criteria for the recognition and transfer of credits and prior learning. Programme reaccreditation covers all phases of the student lifecycle from admission to certification, including the recognition of credits and prior learning (ESG 1.4). IMPLANTA addresses analysis of the information on results achieved in the implementation of mechanisms for admission, recognition and certification, and on how findings feed into decision-making.

Programme evaluations and IMPLANTA set detailed requirements for the number, qualifications, competences and continuing professional development of teaching staff (ESG 1.5), with staff training to be designed so as to encourage innovation in teaching and the use of new technologies. The processes also thoroughly assess learning resources and student support (ESG 1.6) including mechanisms for analysis of needs and measurement of users' satisfaction.

The criteria for programme evaluations and IMPLANTA require that a programme or centre has in place an information management system (ESG 1.7) and uses collected information for decision-making and improvement, and that it publishes relevant information on its website (ESG 1.8). The range of data to be analysed and used, and of the information to be published, covers all items listed under the two standards of the ESG.

The requirement to undergo a periodic evaluation or review (ESG 1.10) is set in the national legislation and included in ACCUA's guides for the programme evaluation and IMPLANTA processes.

The panel confirms that the agency's criteria for international **joint programme evaluations** reproduce all of the standards of the *European Approach for Quality Assurance of Joint Programmes*.

Evaluation of **PARS** (as pathways between Bachelor's and Master's degree programmes) is not specifically aimed at assessing the effectiveness of internal QA. The agency's criteria focus on consistency between the name of a PARS and the related Bachelor's and Master's degrees; the scope and design of a programme, including its links to the related degrees; coherence; courses to be completed; compliance of academic regulations with the national legislation; and access and admission criteria.

Overall, the panel believes that ACCUA's criteria for evaluations of degree programmes and IMPLANTA fully embrace the standards of Part I of the ESG and, consequently, institutional accreditation is also well conceived to verify a centre's compliance with these standards. While the criteria for PARS do not address Part I standards, PARS pathways are evaluated in the follow-up and reaccreditation reviews for degree programmes.

DOCENTIA assesses thoroughly a university's framework for teaching activity evaluation, including objectives, structures and procedures, as well as mechanisms for a periodic review and continuous improvement of the teaching activity evaluation system itself (ESG 1.1); teaching methodologies (ESG 1.3); and mechanisms for QA of teaching staff (ESG 1.5) and the collection, analysis and use of data relating to teacher evaluation (ESG 1.7). Learning resources and student support are considered insofar as they are linked to teaching activity evaluation. A teaching activity evaluation model, all underlying documents and reports on outcomes of teaching activity evaluations should be published on the university's website (ESG 1.8). The agency's procedure for DOCENTIA explicitly refers to its cyclical nature (ESG 1.10).

ACCUA's criteria for **accreditation of foreign language skills** require that a university has in place mechanisms for review and improvement of its language skills certification procedure (ESG 1.1), based on an analysis of the collected evidence (ESG 1.7). It should have an adequate number of well-trained examiners; a clear enrolment procedure, examination procedures that ensure objectivity and equal opportunities and allow students to file appeals and complaints; and a procedure for issuing certificates (ESG 1.3 and 1.4). Detailed information about language exams (with all relevant items listed in the criteria) should be regularly updated and published on the university's website (ESG 1.8). The agency's guide clearly states that accreditation of foreign language skills is a cyclical process (ESG 1.10).

In the panel's view, the criteria for DOCENTIA and accreditation of foreign language skills incorporate the standards of Part I to the extent that is possible considering the specific focus of these processes. As both processes are voluntary, the panel regards them as complementary to mandatory programme evaluations, and to IMPLANTA and institutional accreditation.

Reviews of universities for recognition focus on the justification for the establishment of an institution in the context of national and regional needs, and on conditions in place to ensure the feasibility of the plans and the continuity of teaching activities for students. ACCUA's criteria incorporate ESG 1.1, 1.2, 1.3 and 1.9 insofar as they refer in broad terms to a QA policy and mechanisms for the development, approval, monitoring and continuous improvement of programmes; and an adequate

structure of programmes and suitable teaching and learning and assessment methods, with no particular attention paid to a student-centred approach. Institutions are required to establish a body and set criteria for student admissions (ESG 1.4). Much attention is paid to the strategy for recruitment and selection and the number and qualifications of academic staff (ESG 1.5), and to teaching and learning facilities and resources (ESG 1.6). ESG 1.7, 1.8 and 1.10 are not directly applicable to this process as it reviews new institutions and ends with official recognition by the regional authorities. Overall, the standards of Part 1 of the ESG are only selectively addressed. However, the panel does not consider this as an issue as once an institution is recognised, its official degree programmes undergo a cycle of mandatory evaluations from verification to reaccreditation.

The evaluation criteria and the reports examined by the panel place much emphasis on the effectiveness of internal QA in the processes for which this is relevant, including programme reaccreditation, joint programme evaluation, IMPLANTA (accreditation and follow-up), DOCENTIA (implementation follow-up and certification renewal) and accreditation of foreign language skills (follow-up and reaccreditation), and in the programme follow-up insofar as shortcomings in the design of internal QA mechanisms were identified in the verification or modification process. The reports provide evidence and comments on how internal QA processes and procedures are reviewed and improved, and how data and other evidence for various evaluated aspects (e.g. a QAS, a programme, learning facilities, teaching activity, a language test) is collected, analysed and used to make improvements.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2019 review recommendation: The agency’s engagement with stakeholders needs to be reviewed in order to create the same weight of influence and parity of esteem with stakeholders outside the universities. In particular, the creation of an advisory board for the agency itself (*as distinct from the organisation (AAC-DEVA) of which the agency (DEVA) was part before the establishment of ACCUA as a separate body*) would be of assistance.

Evidence

In designing its evaluation methodologies, ACCUA takes into consideration the national and regional legislation and the ESG. Draft documents are submitted to stakeholders for feedback, revised accordingly where necessary, and approved by the Technical Committee. Following the enactment of the new legislation (see “Quality Assurance”), the agency had meetings at each university to discuss drafts of updated evaluation guides and protocols. (SAR) Feedback on the ongoing evaluation processes is collected through surveys of universities and evaluators, in meetings with universities and through the mailbox for suggestions and complaints; see ESG 3.6 for details and examples of improvements that the agency made in response to the feedback collected and provided in the SAR.

As the stakeholders told the panel, the development and revision of methodologies is a participatory process involving representatives of all stakeholder groups on the Technical Committee, universities and evaluators, including student experts. The agency took on board all suggestions made by students. As noted under ESG 3.1, in the context of the planned shift from programme to institutional

accreditation, the rectors welcome the recent opportunity to discuss with the Director the needs of their universities regarding IMPLANTA and the schedule for the implementation of the process. The QA officers would appreciate it if they could be involved at the stage when the agency is working on evaluation guides rather than at the end of the development or revision process. At the time of this review, in response to the feedback received from universities and evaluators, ACCUA was reviewing the guides to streamline the evaluation processes and reduce the burden on universities. As changes in the guides made two years ago to align them with the new legislation created additional work, the QA officers expect that any further revisions will be made in dialogue with universities. (Meetings with the Technical Committee, university rectors and QA officers, evaluators and students)

Since the 2019 review, the agency has adopted methodologies for four new processes: IMPLANTA, institutional accreditation, evaluation of PARS, and evaluation of international joint programmes. Evaluations of international joint programmes are based on the *European Approach for Quality Assurance of Joint Programmes* (SAR; ACCUA's *Guide for the Evaluation of International Joint Programmes within the European Approach Framework for Quality Assurance*). The evaluation guides were revised before the establishment of ACCUA, and the new agency has not made any substantial changes in the AAC-DEVA methodologies for the existing processes (SAR; Final clarification meeting).

The evaluation guides and protocols refer to the legislation and the ESG as the reference framework for the processes, and describe their objectives, characteristics, procedure, including the follow-up where applicable (see ESG 2.3), criteria (ESG 2.1) and possible outcomes (ESG 2.5). Except for review of universities for recognition, each process ends with a formal decision or, in the case of the follow-up, with recommendations where necessary, which are included in a final report (ESG 2.6). Universities submit improvement plans, and the follow-up focuses on improvements made in response to recommendations (SAR; Evaluation reports).

Pursuant to the national legislation, degree programmes provided by institutionally accredited centres are reaccredited through institutional accreditation rather than through programme reaccreditation, which substantially reduces the burden of evaluations on universities. The SAR states that in designing and modifying its evaluation processes, ACCUA also aims to minimise the workload and cost of implementation of other processes for Andalusian universities. For example, IMPLANTA does not require a prior certification of the design of a QAS, focusing on its effectiveness; compliance with the criterion addressing the QAS is not assessed in programme verification for institutionally accredited centres; and the follow-up for programmes at institutionally accredited centres is conducted as part of the IMPLANTA follow-up. Despite that, the SAR and the SWOT analysis acknowledge that universities perceive the evaluation processes as highly bureaucratised.

As the representatives of universities told the panel, evaluations have helped universities to improve performance in all areas, including strategic planning and management, teaching, research, student services and internationalisation. Overall, they combine the compliance and enhancement dimensions. However, programme evaluations are perceived more as burdensome compliance-oriented audits as too many data must be provided in reports to meet the requirements in the national legislation. Evaluations could make greater use of existing documents. There could be a centralised electronic system where universities input data, and which also gathers data from other sources (for example, on graduate employment); ACCUA could have access to the system and generate reports rather than requiring that universities produce a report each time. The move from programme to institutional accreditation would greatly ease the burden on universities and thus the universities are glad that ACCUA now focuses on IMPLANTA.

As indicated under ESG 3.6, activities designed to support universities in the shift to institutional accreditation are included in the 2024 Action Plan and have already been initiated. Members of the Technical Committee were appointed in March 2024, were reviewing the evaluation guides at the time

of the panel's visit and thus were not yet able to discuss how the evaluation processes could be streamlined. However, they believe that institutional accreditation would be the best way to reduce the bureaucratic burden on universities.

Analysis

In more general terms, as noted under ESG 3.1, ACCUA has expanded its engagement with stakeholders beyond universities in line with the 2019 review recommendation under this standard, and all stakeholder groups are now satisfied with their involvement in the agency's activities. The evidence provided in this and the ESG 3.6 sections also demonstrates that all of the relevant stakeholder groups have been genuinely involved in the development and revision of the evaluation methodologies, mechanisms for the collection of feedback on the ongoing evaluation processes are in place, and the feedback gathered has been used for continuous improvement. As regards consultations with universities, the panel agrees with QA officers that the agency would benefit even more from their knowledge and experience by involving them from the beginning of the process for reviewing the evaluation guides.

With the new organisational structure of the agency and all relevant stakeholder groups now represented on the Technical Committee and the evaluation committees, the panel considers that there is no longer a need to create an advisory board recommended by the 2019 review panel, and any role of such a body in the development of methodologies would overlap with that of the Technical Committee. As ACCUA is now establishing links with a wider range of social partners outside its bodies (see ESG 3.1), the Technical Committee may wish to additionally seek their inputs in reviewing the methodologies in the future. However, as noted under ESG 3.1, the Committee needs to be urgently briefed about the agency's activities to effectively perform its tasks, and could also benefit from inputs from international experts.

All of the evaluation processes, including those introduced since the previous review, have clear goals and objectives and the methodologies are fit for purpose. The panel welcomes the modifications that ACCUA has made so far to streamline its evaluation processes for institutionally accredited centres. Based on the criteria and the sample of evaluation reports examined, the panel agrees with the representatives of universities that programme evaluations create a huge workload for teaching and administrative staff. As the demanding requirements are set in the national legislation, the panel supports the idea of creating a centralised system for the collection of necessary data, which ACCUA could use in its evaluations; this is an issue that could be raised within REACU. In this context, it is also promising that the agency has included in its Initial Action Plan and has initiated activities designed to prepare universities for QAS accreditation, and thus pave the way for institutional accreditation which will lift the heavy burden of programme evaluations.

Panel commendations

- I. ACCUA has made consistent efforts to streamline its evaluation processes and has a clear plan to support universities in the move from programme to institutional accreditation and thus to reduce the burden of evaluations.

Panel suggestions for further improvement

- I. To ease the burden on universities, the panel suggests that ACCUA discuss within REACU the idea of creating a centralised electronic system for the collection of data required for programme evaluations, with a view to pursuing the matter with the national authorities.

Panel conclusion: compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

Evidence

The procedures for all of ACCUA's evaluation processes are described in the *Evaluation Programmes: Procedures and Functions* and the guides and protocols for all processes that are published on its website.

All evaluation processes, except for institutional accreditation, include a self-assessment report (for PARS, an application providing information required by the legislation), an external assessment, a report resulting from an external assessment and – except in reviews of universities for recognition and PARS – a follow-up (see the overview table below).

Institutional accreditation involves only formal verification of documents relating to QAS accreditation / IMPLANTA and programme reaccreditation. Thus, such a review is conducted by the agency's internal evaluation committee (see ESG 3.3) and does not follow the stages recommended under this standard, except that it ends with a report. While there is no specific follow-up for PARS, such pathways are covered by the follow-up for the related Bachelor's and Master's degree programmes as PARS link the two levels of study. Reviews of universities do not include a follow-up as this is a one-off process, regulated by the legislation, which ends with the recognition of a university by the national authorities (see "ACCUA's Functions, Activities, Procedures"); official degree programmes to be offered by the university undergo mandatory evaluations and university centres may apply for QAS accreditation and, subsequently, for institutional accreditation. (SAR; Guides for the evaluation processes; ACCUA's written pre-visit clarifications; Final clarification meeting)

A site visit is part of an external assessment in all evaluation processes except for programme verification / modification, including PARS, and review of universities for recognition; in the programme follow-up, a visit is included for "special monitoring" cases, which are listed in the respective guide. Site visits are not conducted as part of programme verification and reviews of universities for recognition as they are not provided for in the Spanish legislation. The ACCUA Director told the panel that he is willing to include it in programme verification and review of universities as it is evidently a more effective way to verify the accuracy of information provided in a self-assessment report and to gain a broader picture of a programme or institution (Final clarification meeting). In the processes that include a site visit, in addition to interviews with key stakeholders, its agenda includes a mandatory public hearing for any interested individuals who are not selected to attend scheduled meetings (SAR; Evaluation guides).

The follow-up aims to verify whether universities have implemented recommendations and encourage them to make further improvements. A follow-up takes place in the third year (midpoint) of the accreditation cycle in programme evaluations and IMPLANTA, at least two years after the implementation of a teaching activity evaluation model in DOCENTIA, and on an annual basis as part of accreditation of foreign language skills (SAR; Evaluation guides; Meeting with national evaluators).

Stages in the implementation of the evaluation processes (reproduced from the SAR)

ELEMENTS OF THE REVIEW ACTIVITIES	QUALITY ASSURANCE ACTIVITIES									
	VERIFICATION / SUBSTANTIAL MODIFICATION	FOLLOW UP / MONITORING	EX POST RE-ACCREDITATION	NON SUBSTANTIAL MODIFICATION	EUROPEAN APPROACH	DOCENTIA	IMPLANTA	INSTITUTIONAL ACCREDITATION	REVIEW OF UNIVERSITIES FOR RECOGNITION	ACCREDITATION OF FOREIGN LANGUAGE SKILLS
Self-assessment report	YES	YES	YES	YES	YES	YES	YES	Not applicable	File	YES
External review by a committee that includes students	YES	YES	YES	YES	YES	YES	YES	Not applicable	YES	YES
Visit	NO	NO	YES	NO	YES	YES: in certification phase	YES/NO*	Not applicable	NO	YES
Preliminary evaluation report	YES	NO	YES	NO	YES	YES	YES/NO*	Not applicable	NO	YES
Allegations to the preliminary report	YES	NO	YES	NO	YES	YES	YES/NO*	Not applicable	NO	YES
Public final evaluation report	YES	YES	YES	YES	YES	YES	YES	YES	YES, produced but not published.	YES
Appeal to the final report	YES, before the Council of Universities (state level)	NO	YES, before the Council of Universities (state level)	YES, before ACCUA	YES, before the Council of Universities (state level)	YES, before ACCUA	YES/NO* before ACCUA.	YES**	YES, before the Regional Ministry	YES, before ACCUA
Recommendations in the final report	YES	YES	YES	YES	YES	YES	YES	Not applicable	YES	YES
Follow-up	YES	YES	YES	YES	YES	YES	YES	Not applicable	NO	YES

(*) YES in the Certification of implementation and in the renewal. NO in the follow-up of certification.

(**) YES. In the event of an unfavourable resolution, which must be justified, it will specify the appeals that may be filed against it, the administrative or judicial body before which they must be filed, and the deadline for filing them.

Procedure for PARS as a non-substantial modification (as explained by ACCUA in its written pre-visit clarifications): an application including information required by the legislation; an external assessment, with no site visit, and an evaluation report; no follow-up specifically for PARS, but Bachelor's and Master's degree programmes linked by PARS are monitored as part of the follow-up for degree programmes.

Evaluation reports are prepared by the evaluation committees and checked for consistency by the agency's Committee for Issuing Reports. The content of reports produced by the evaluation committees and decisions taken by the committees in the evaluation processes are binding upon the Director who issues formal decisions. For further details, see ESG 2.5 and 2.6.

To ensure consistency in the implementation of the evaluation processes, ACCUA provides guides, training and report templates to universities, and training, guides and report templates to the evaluation committees; appoints staff to provide advice and clarifications to the committees regarding the legal framework and the evaluation procedure; and conducts satisfaction surveys of evaluated universities and evaluators. (SAR; Meetings with university rectors, national evaluators and students) University QA officers and evaluators told the panel that the evaluation processes are implemented consistently and strictly follow the procedures described in the guides.

Analysis

The panel confirms that the evaluation processes are predefined in the evaluation guides and protocols that are published on the ACCUA website. The training, guides and report templates provided to universities and evaluation committees, support offered to committees by staff throughout evaluation processes and post-evaluation satisfaction surveys are, in the panel's view, adequate mechanisms to ensure that the processes are consistently implemented. This is also confirmed by the feedback collected by the panel from university QA officers. The evaluation guides describe the procedures in great detail, and as explained under ESG 3.6, the post-evaluation surveys are well designed to identify possible improvements; thus, for example, as indicated under ESG 3.6, more time was allocated in a site visit programme to interviews to make them more useful for universities and evaluators.

All of the evaluation processes except for institutional accreditation, PARS evaluation and review of universities for recognition include the four main steps recommended under this standard. While institutional accreditation does not provide for a self-assessment and includes an internal review rather than an external assessment, the panel considers that this is justified as the process is limited to a formal verification of IMPLANTA and programme accreditation documents, and both IMPLANTA and programme reaccreditation cover all of the recommended procedural steps. No follow-up could be included in PARS evaluation or review of universities for recognition as both are one-off processes; the panel also notes that any approved PARS and programmes to be provided by newly established universities would undergo a mandatory follow-up for accredited degree programmes.

The panel is aware that the Spanish legislation does not provide for a site visit in programme verification and review of universities for recognition. It believes, however, that it should be included in both processes for full compliance with ESG 2.3 and as the best way to validate documentary evidence for some of the evaluation criteria. The panel was glad to hear that that the agency will consider this option. As compliance with the criteria for PARS (see ESG 2.1) can be easily verified in a desk-based review, the panel believes that there would be no added value in a site visit conducted specifically as part of PARS evaluation.

The evaluation reports examined by the panel (see ESG 2.6) indicate that self-assessment reports and site visits provide ample evidence to the evaluation committees to make judgments and recommendations for improvement. The timelines for the follow-up (one, three or four years after the previous stage, depending on the specificity of each process) are clearly defined in the evaluation guides and set so as to allow universities enough time to implement recommendations made at the previous stage. The follow-up reports examined thoroughly review the progress made and clearly indicate what universities are still expected to do to fully meet the criteria.

Panel recommendations

- I. ACCUA should include a site visit in programme verification and review of universities for recognition.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Evidence

Except for institutional accreditation reviews (see ESG 3.3 and 2.3), evaluations are conducted by the evaluation committees, composed of external evaluators, or by smaller review panels for specific fields appointed from among members of the larger committees for academic fields. The number, size and composition of the committees depends on the specificity of the evaluation process, with those for programme evaluations being larger and sub-divided by academic field. The evaluation committees for all processes include academics and one or more students, and the one for IMPLANTA additionally involves a QA expert. Professionals are members of the committees for all processes, except for IMPLANTA and evaluation of non-substantial modifications. International experts participate in some programme verification and reaccreditation reviews; their limited involvement is listed as a weakness in the SWOT analysis. The committees (or review panels) may also involve other evaluators from the ACCUA Databank of Evaluators if additional expertise is necessary in a particular evaluation. (SAR; *Evaluations of Programmes: Procedures and Functions*; Evaluation guides; Composition of the committees published on the ACCUA website)

The SAR states that the agency has 9,397 experts registered in its Evaluator Database, including academic experts (academics and technical or QA experts) (89%), students (6%) and professionals (5%). Within the pool, there are 232 international experts residing in Spain and 94 recently recruited national experts residing abroad. Although the number of international experts has increased in recent years, it is not easy to find experts with sufficient knowledge of Spanish; thus, ACCUA will be seeking experts via Ibero-American QA agencies and organisations.

ACCUA recruits experts through its website where candidates can submit their applications, agreements signed with international QA agencies, enquiries sent to Spanish and European academic and research institutions and calls published on the websites of European organisations involved in QA, including ENQA and ESU (SAR). Calls for applications are published specifically for student experts and professionals. (Meeting with the area coordinators; Final clarification meeting). As the panel learned from students, those who are not extensively involved in QA would not normally look for such announcements.

Evaluators are recruited from outside Andalusia, except students in the programme follow-up committee who can also come from local universities but do not participate in evaluations of their universities (see also ESG 3.3). Academics are required to have the title of university or associate professor, specific research achievements or experience, and experience in management and evaluation. Technical or QA experts should have proven experience in QA in higher education. The criteria for professionals include renowned status and proven extensive experience in a given field. Students should be enrolled

on a Bachelor's, Master's or PhD programme, with priority given to those who have experience in QA and as members of QA commissions at their home institutions. For evaluations of international joint programmes, the agency appoints evaluators from its Database and experts proposed by the other agencies concerned. (SAR; *Selection and Appointment of Evaluators*; Meetings with students and international experts).

Committee (panel) members are selected by a commission which consists of the area coordinator concerned and two ACCUA staff members, and are appointed by the Director for a four-year term. The selection takes into account general criteria, including, in particular, independence and no-conflict-of-interest, balanced representation of academic areas where appropriate, availability and responsibility, and gender balance where possible; the specific criteria for each category of experts; and the relevance of their profiles for a given evaluation. Institutions may raise reasoned objections to the composition of a review panel appointed for a particular evaluation. (SAR; *Selection and Appointment of Evaluators*; Meeting with the area coordinators)

Upon appointment, evaluation committee members sign ACCUA's Code of Ethics, which highlights the principles of independence and impartiality. Once appointed for a four-year term, all of the evaluation committees receive evaluation guides, guides for report drafting and training. The training covers the national and regional legal framework and all stages of the procedure and criteria for a given evaluation process, and agency staff clarify any issues or doubts raised by experts during the training session. (SAR; Meetings with national and international evaluators and students). As the panel learned from national evaluators, the evaluation committees involved in some processes also have a training session at the beginning of each evaluation period. Additionally, the agency organised training sessions on changes introduced by the recently passed national legislation for all of the evaluation committees concerned. For the evidence on the performance appraisal for experts, see ESG 3.6.

All the experts interviewed praised the staff for their support throughout the evaluation process. The national and international academic experts also complimented the agency for the comprehensive training and guides. Opinions of the student experts varied; the training and the guides are fully sufficient for some of them, whereas those with more limited previous experience in QA would like to have more in-depth training. Except one who expressed doubts about the competence of an evaluator, the representatives of universities whom the panel met consider that the evaluation committees are well-chosen and well-prepared to do their job.

As stated in the guide *Evaluation Programmes: Procedures and Functions* and the evaluation guides, students and professionals have the same role as academics in reviewing documents, contributing to discussions and participating in decision-making, and students also draft parts of reports in, for example, the IMPLANTA, DOCENTIA, follow-up and programme reaccreditation processes. All of the experts interviewed agreed that there is genuine collaboration within the evaluation committees, all members are treated as equal, and all contribute to reports. Professionals focus on the criteria related to employability; students evaluate the same aspects as academics and receive the same fee, and can even have more responsibility as secretaries of the evaluation committees.

Analysis

As explained in the ESG 3.3 and 2.3 sections, while institutional accreditation reviews are carried out by an internal committee of the agency rather than external experts, this is not an issue, in the panel's view, as the process is limited to verification of the accuracy of programme reaccreditation and QAS accreditation documents. The composition of most of the committees conducting external evaluations fully complies with this standard. The panel accepts that professionals are not members of the committees for IMPLANTA and non-substantial modifications as an academic, a student and a QA expert in the former can be expected to provide all the necessary expertise, and non-substantial modifications evaluated by the latter do not affect key aspects of a programme.

The Evaluator Database includes a rather small proportion of professionals, and the composition of the committees published on the ACCUA website indicates that most of the professional members have a higher education or research background. The panel believes that it would be useful to involve practitioners from a wider range of sectors.

In selecting experts for an evaluation of an international joint programme, ACCUA follows the *European Approach* (see ESG 2.1 and 2.2). The panel can confirm that the only evaluation of an international joint programme conducted by the agency so far involved international experts who either came from or were well familiar with the higher education systems in the countries of the participating institutions. The panel recognises that the language proficiency requirement is a constraint in the search for international experts for other evaluation processes. It is glad to note that the agency has recently expanded its pool of international experts and supports its plans to look for experts in Latin America.

Using a wide variety of channels for recruitment, ACCUA has registered in its Database a large number of academic experts. Since public calls for students reach mainly those who are most active, the base from which student experts can be drawn is relatively narrow. The agency might consider alternative ways to attract to the pool more candidates with less experience in QA, for example, via student organisations.

The selection process is conducted in accordance with clearly defined and published criteria, and in a transparent way, with the involvement of a committee and the Director and the possibility for a university to be evaluated to raise objections to the composition of a committee. The panel understands from its meeting with the students that although the criteria give preference to candidates who have documented experience in QA, this does not exclude less experienced students. The agency can effectively prevent a possible conflict of interest for evaluators, with the arrangement whereby academics and professionals come from outside Andalusia, the abstention rule for Andalusian students in the follow-up committee, and the Code of Ethics signed by evaluators.

The agency has developed high-quality guides for its evaluators, which describe in great detail each step and all aspects of the evaluation processes. The panel understands from its meetings that academic and professional evaluators are satisfied with the guides and the training received. It believes, however, that all, rather than only some, of the evaluation committees would benefit from a refresher training before each evaluation round. In addition to the evaluation methodology, it could cover findings from satisfaction surveys (see ESG 3.6) and general findings from evaluations analysed in thematic reports, if these are available (see ESG 3.4). Based on thematic studies, ACCUA could highlight in such sessions the evaluation criteria to which the committees should pay particular attention.

The student experts whom the panel met are very committed, but it is clear that the training does not necessarily give those who are less experienced the knowledge and the self-confidence they need to maximise their contribution to all aspects of an evaluation. The national experts whom the panel met emphasised that student-centred learning, teaching and assessment are still challenging concepts for universities and thus the evaluation committees place much emphasis on these aspects in analysing self-assessment reports and during site visits. A separate training session for students, which should be organised in addition to the training for the evaluation committees, could give special consideration to the criteria addressing these aspects.

The feedback from evaluated universities indicates that even if there are some exceptions, evaluation committees are overall highly regarded for their competence. The panel notes, however, that there is no formal performance appraisal mechanism for experts; this is addressed by its recommendation under ESG 3.6.

The tasks within the evaluation committees are distributed in a way which ensures genuine involvement of all members and good use of their expertise, and it is reassuring that students, in particular, are and feel to be equally valued members.

Panel commendations

1. ACCUA has produced well-structured and comprehensive guides to support its evaluation committees.
2. The panel commends ACCUA for involving in its evaluations highly committed student experts.

Panel recommendations

1. ACCUA should provide more in-depth training to student experts to ensure that even those with more limited experience are and feel fully competent to perform their tasks.

Panel suggestions for further improvement

1. In addition to public calls, ACCUA could search for prospective student experts in ways which will allow it to reach those who are less experienced or less active in internal quality assurance at their home universities.
2. The panel encourages ACCUA to involve in its evaluation committees practitioners from a wider range of sectors beyond higher education and research.
3. The panel encourages ACCUA to pursue vigorously its efforts to recruit more international experts.
4. In addition to the mandatory training already provided, ACCUA could organise refresher training sessions for all experts before each evaluation round.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

The evaluation criteria are described in the guides and protocols. The guides for programme reaccreditation and IMPLANTA also define possible levels of compliance with the criteria to support evaluators in making comparable judgements (achieved, partly achieved or not achieved or satisfactory, sufficient or insufficient). The SAR states that the training for evaluators places emphasis on the need for consistency in the application of the criteria, and the staff coordinating evaluations advise evaluators on how the criteria were addressed in previous evaluation reports. The chair of an evaluation committee reviews draft reports to ensure that the criteria are consistently applied. (SAR; Evaluation guides, protocols and reports)

ACCUA also has a Committee for Issuing Reports for each evaluation process, which scrutinises draft reports produced by the evaluation committees for consistency in the application of the criteria and the use of terminology across academic fields or institutions, while not changing their substance or evaluation outcomes. The Committee consists of the Director or his/her representative, the area

coordinator(s) concerned, the chairs and secretaries of the evaluation committees, a student, a professional, a technical or QA expert where appropriate, and a staff member as the secretary. The Committees were created in response to requests from universities to standardise evaluation reports in terms of how they address the criteria. When mistakes or inconsistencies are identified, the Committee gets back to the evaluation committee to make revisions. (SAR; Evaluation guides and protocols; Meetings with area coordinators and national evaluators; Final clarification meeting)

ACCUA does not take decisions in reviews of universities for recognition; in addition to evidence and analysis per each criterion, its review reports include only “observations” or “concerns” in the areas where it identifies issues for consideration by the regional authorities, to which reports are submitted. The follow-up, where included, ends with recommendations for further action where necessary. All of the other evaluation processes lead to a formal outcome: a favourable, conditional or unfavourable decision in IMPLANTA and a favourable or unfavourable decision in the other processes. ACCUA takes final decisions in the following processes: non-substantial modification in programmes, IMPLANTA, DOCENTIA and accreditation of foreign language skills. Final decisions in programme verification, substantial modification and reaccreditation and in institutional accreditation are taken by the Council of Universities at the national level. In reviews of universities for recognition, the Regional Parliament takes final decisions on the creation or recognition of universities, based on the agency’s evaluation reports and the assessment of legal compliance conducted by the Regional Ministry in charge of higher education.

Analysis

The panel confirms that the evaluation criteria are published in the guides on the ACCUA website. The criteria are clear and evidence-based, and the guides for IMPLANTA and programme reaccreditation clearly define requirements for each level of compliance. Although the criteria for all of the evaluation processes explain what a university, centre or programme must or should have in place, the agency would, ideally, draw up and publish a list of the (sub-)criteria or indicators to be met for a favourable decision.

The emphasis on consistency in the training for experts, the advice provided by staff and, in particular, the work done by the Committees for Issuing Reports all demonstrate that ACCUA takes great care to ensure consistency in the application of the criteria. This is also helped by the arrangement whereby the evaluation committees are appointed for a four-year term and their members are replaced at the end of the term in a staggered manner (see ESG 2.4), and thus newcomers can rely on the collective experience and memory of the committee. The panel can confirm that the reports it examined address the criteria in a uniform manner. It also found in its meetings with all external stakeholders that there is a high level of trust in how ACCUA takes its evaluation decisions.

Panel commendations

- I. ACCUA invests great effort to ensure consistency in the application of its evaluation criteria, with a key role of the Committees for Issuing Reports, and this is clearly reflected in its final evaluation reports.

Panel suggestions for further improvement

- I. ACCUA could consider compiling and publishing a list of criteria or indicators which must be met for a favourable decision in each evaluation process.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Evidence

The evaluation committee conducting an evaluation prepares a draft or “provisional” report, which is scrutinised by the Committee for Issuing Reports (see ESG 2.5), revised where necessary, and sent to the evaluated university which can raise any objections (“allegations”). If the university files objections, the report is reviewed and revised, where necessary, by the evaluation committee. If the university raises no objections, the report is considered final and published.

The SAR describes the process of filing and considering objections to a provisional report together with the appeals and complaints processes in the section on ESG 2.7. However, it is discussed here in this report as it takes place before ACCUA issues a final evaluation report and decision. The procedure for considering objections is described in the *Evaluation Programmes: Procedures and Functions* and the evaluation guides and protocols. Objections to a provisional evaluation report are considered by a new review panel within the same evaluation committee that prepared the provisional report. The panel checks whether the evaluation was formally correct in terms of the examination of evidence and the application of the evaluation criteria, and the evaluation committee produces a final report.

Regardless of minor variations reflecting the specificity of each evaluation process, reports contain the following elements: identification details about the evaluated programme, centre or university; the legal basis and the procedure; the composition of an evaluation committee or a reference to its composition published on the ACCUA website; evidence combined with an analysis of compliance with the criteria; recommendations (objections or concerns in reports on reviews of universities for recognition); and the evaluation outcome (except in reports on reviews of universities for recognition and the follow-up as the agency does not take decisions in these processes; see ESG 2.5).

The SAR states that ACCUA publishes on its website reports with both favourable and unfavourable decisions for all of the processes, except for reviews of universities for recognition. The agency has also published 4,257 reports on DEQAR. As regards reports produced in reviews of universities for recognition, the agency explained in the final clarification meeting that these are “advisory reports” intended for the regional authorities. Thus, the Regional Parliament, which establishes universities by law, considers the agency’s reports together with reports produced by other bodies (see “ACCUA’s Functions/Activities/Procedures”), and all reports are published as part of the legislative process.

Except one expressing dissatisfaction with the quality of a report, the representatives of universities interviewed considered that reports are clear and provide useful recommendations for improvement.

Analysis

The panel confirms that reports including both favourable and unfavourable outcomes are published on the ACCUA website for all of the evaluation processes except for reviews of universities for recognition. Considering the specific nature of reviews of universities, the panel would not consider it an issue that reports for this process are published by the regional authorities rather than by ACCUA. However, it did not find the agency’s reports on the website of the Andalusian Parliament. As reviews of universities for recognition are conducted at the request of, and reports are prepared for the regional authorities, the panel is aware that ACCUA is not authorised to publish reports on

its website. It believes, however, that the agency should raise the issue with the regional authorities to ensure that reports are made available to the public.

For the processes at university or centre level, where the number of evaluations conducted is small (e.g. IMPLANTA, DOCENTIA), published reports are arranged by university or centre; for programme evaluations, the agency's database can be searched by university, centre, level and field of study or degree. This makes the search for a particular report easier for potential readers such as prospective students or employers. The search would be even easier if reports on programme evaluations were published – like those for institutional-or centre-level processes – in the section of the website devoted to programme evaluations rather than in the one that provides information about ACCUA.

The involvement of the Committee for Issuing Reports in reviewing provisional reports for homogeneity, and of a new review panel within the evaluation committee in considering objections to provisional reports, are a testimony to the care ACCUA takes to produce high-quality reports. The reports examined by the panel are well-structured and well-written, and provide a fair amount of evidence for analysis and conclusions for each evaluation criterion and clear recommendations for improvement. Although reports discuss both strengths and weaknesses, there is no specific place in their structure to identify examples of good practice. Such examples, alongside recommendations under each evaluation criterion, would demonstrate a positive approach of the agency and could encourage quality improvements in the university system.

Panel recommendations

1. ACCUA should agree with the regional authorities arrangements for the publication of reports on reviews of universities for recognition.

Panel suggestions for further improvement

1. Alongside recommendations, the structure of evaluation reports could include examples of good practice which are worth rewarding and disseminating in the university system.
2. To facilitate the search for reports for uninitiated readers, ACCUA could consistently publish all reports in the sections of its website dedicated to the respective evaluation processes.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2019 review recommendation: The agency needs to develop a specific procedure to deal with complaints.

Evidence

Appeals

The SAR states that final formal outcomes of all evaluation processes can be challenged by an appeal as they constitute administrative decisions. As the panel learned from the ACCUA Appeals Committee, if dissatisfied with an appeals decision taken as part of administrative proceedings, a university can appeal against it to a court of justice.

Appeals in reviews of universities for recognition are considered by the Regional Ministry, with no involvement of ACCUA as its “advisory reports” do not end with a decision (see ESG 2.5 and 2.6) (SAR; Meeting with the Appeals Committee; Final clarification meeting). The appeals procedures for all other evaluation processes falling within the scope of the ESG are set out in the *University Programmes: Appeals Procedure*. The SAR states that the document is published on the ACCUA website and universities are electronically notified of the appeals procedure.

Pursuant to the national legislation, appeals in the evaluation processes where the Council of Universities takes final decisions (see ESG 2.5) are lodged with that body. If an appeal is allowed for consideration, the evaluation report is reviewed by the University Council’s Committee for Complaints on the Verification and Accreditation of Study Plans, which consists of experts who have not been involved in the evaluation leading to the appeal. If the available evidence is sufficient, the committee proposes a resolution to the Standing Committee of the Council. Otherwise, the committee sends back the evaluation dossier to the agency, indicating aspects that require a new evaluation. Based on a new report from the agency, the committee proposes a resolution to the Standing Committee of the Council of Universities that takes the final decision.

Since the 2019 review, the agency has revised its appeals procedure and set up the University Programmes Appeals Committee for the evaluation processes falling within the scope of the ESG. The Committee considers appeals in the processes where ACCUA takes final decisions and appeal cases where the Council of Universities requests the agency to conduct a new evaluation. It consists of the chair, five experts representing academic fields, including QA and the Common European Framework of Reference for Languages, and a professional and a student. As some appeals concern legal matters, one of the members is a lawyer. Members are appointed in accordance with the procedure for evaluators (see ESG 2.4). The composition of the Committee is published on the ACCUA website. The procedure allows the Committee to seek advice from other experts where necessary. (SAR; Appeals procedure; Meeting with the Appeals Committee)

As the Appeals Committee explained to the panel, for each appeal, two members of the Committee review the documentation to verify whether an evaluation was conducted correctly and prepare individual reports. The Committee discusses both reports, drafts a final report with a recommendation and submits it to the Director who issues a formal decision. The Committee’s recommendation is binding upon the Director.

The timeframe for the consideration of appeals by ACCUA is one month. An appeal process concerning a programme evaluation, which involves the Council of Universities and the agency, should be completed within three months. (*University Programme: Appeals Procedures; Evaluation guides*)

The SAR states that the number of appeals against final outcomes is usually very low as the evaluation procedures include a stage where universities or centres may file objections to provisional reports (see ESG 2.6). The Appeals Committee was unable to explain to the panel the reasons behind some discrepancies between its / the agency’s appeals decisions and those taken by the Council of Universities (see the table below) as it did not receive the Council’s decisions. In the final clarification meeting, the Director explained that the agency receives the Council’s decisions.

Appeals against final decisions			
Year	Evaluation process	Number of appeals	Decisions taken by the agency and final decisions taken by the Council of Universities (CoU)
2019	Programme verification	2	2 negative AAC-DEVA/ ACCUA decisions followed by 1 positive and 1 negative CoU final decisions
	Programme modification	3	3 negative AAC-DEVA / ACCUA decisions followed by 3 positive CoU final decisions

2020	Programme verification	1	Appeal dismissed by both AAC-DEVA / ACCUA and CoU
2021	Programme verification	1	Appeal dismissed by both AAC-DEVA / ACCUA and CoU
2022	Programme verification	1	Appeal dismissed by both AAC-DEVA / ACCUA and CoU
2023	Programme verification	2	Appeals upheld by both ACCUA and CoU
	Programme modification	2	Appeals dismissed by both ACCUA and CoU

Complaints

To address the 2019 review recommendation, the agency adopted the *Internal protocol for the processing of complaints, suggestions and congratulations and other types of messages on the quality of services* in 2020 and updated it for ACCUA in 2023. Pursuant to the regional legislation and ACCUA's Statutes and *Internal protocol*, a natural or legal person may lodge a complaint about any of the services provided or activities conducted by the agency. Complaints may be filed through the Suggestions and Complaints Book of the Regional Government of Andalusia, a contact form on the ACCUA's website or its email address, or sent by post. The agency is required to respond to a complaint within 15 days. Staff working in the area concerned draft a response, which should describe measures taken to address the issues identified, and submits it to the responsible area manager who analyses the matter and reviews the response. The draft response is forwarded to the competent governing body, which drafts a final response to be signed by the Director. The agency collects feedback on its handling of complaints through a satisfaction survey.

Since the contact form for complaints was created on its website, the agency has received 5 complaints (1 in 2020, 1 in 2021 and 3 in 2023) and 3 suggestions (1 in 2022 and 2 in 2023) (ACCUA's written pre-visit clarifications).

ACCUA publishes on its website annual reports on results and reports on complaints and suggestions. Aside from proposed improvements and some quick fixes made in response to the feedback collected, the former provide the number of appeals filed, and the latter include the number of complaints received and addressed, average response time and the level of user satisfaction. The QA Commission analyses reports in its annual review of the agency's QAS and proposes improvements. In response to the complaints and suggestions received, the agency, for example, created a mailbox for complaints and made technical improvements to facilitate access to the Evaluators Databank; the QA Commission proposed sending reminders to complainants to increase the response rate in the satisfaction survey, and submitted suggestions to the Technical Committee to adjust some evaluation criteria (2021-2023 reports).

In its discussions during the site visit, the panel found that most of the university representatives were familiar and satisfied with the opportunities for filing appeals and complaints; some QA officers pointed out that there was no channel for raising complaints about the follow-up process or that they did not receive a response within a reasonable time. The agency assured the panel that it acts on the complaints received (one expert expelled for unethical conduct, as noted earlier; for other examples, see above).

Analysis

The agency has fully addressed the 2019 review recommendation by introducing a formal procedure for dealing with complaints. The procedure extends beyond what is expected under this standard as complaints may concern not only the conduct of external QA processes or those carrying them out but any service or activity of the agency. In the panel's view, the procedure is clear, and the several steps in which a draft response is reviewed by the responsible individuals and bodies within the agency's structure indicate that a complaint is carefully considered. With the timeframe for responding to complaints set in the procedure currently in force, ACCUA evidently seeks to handle them efficiently; the panel expects that this addresses the concern expressed in its meeting with the

university representatives. Very few complaints and suggestions were filed in the previous years, and the panel gathers from the improvements proposed in annual reports on complaints and suggestions that they all related to issues which had no significant impact on how the agency conducts its activities.

The appeals procedure is, likewise, clear, and ensures impartiality in decision-making at the agency level as the Appeals Committee is clearly separated from the evaluation committees and its recommendation / decision is based on two individual reports and binding upon the Director. The panel also notes that all relevant stakeholder groups are represented on the Appeals Committee, and the agency is required to issue its decision within a short time. The number of appeals lodged so far has indeed been very low in relation to the volume of the agency's external QA activities (see the statistics in the section "ACCUA's Functions/Activities/Procedures"). As all of them concerned programme evaluations, the short time for considering appeals is important as the process does not cause major disruptions in the launch of new or the delivery of existing programmes.

Although a final decision in the appeals process at the national level is taken by the Council of Universities, that is the same body that made the decision challenged by the appeal, there is an element of impartiality in that a new committee is set up to consider the dossier. In any case, it would be beyond the agency's control to change this procedure as it is laid down in the legislation.

The panel was surprised that the ACCUA Appeals Committee had not received final decisions of the Council of Universities as reasons of discrepancies between decisions taken at the agency and national levels could provide inputs for the Committee's future deliberations on appeals cases, while not affecting its autonomy in the process. However, since the documents are available at the agency, the panel understands that following the discussion during the site visit, they will be provided to the Committee.

The panel can confirm that the information about the possibility of filing complaints and the guides and other documents describing the appeals procedure are published on the ACCUA website. In its view, the information is easily accessible to any interested individuals or institutions. Basic information on how complaints are handled can be accessed via the web contact form, but it would be a good idea to publish on the website the agency's full protocol for dealing with complaints. Annual reports on results and on complaints and suggestions clearly add to the transparency of ACCUA's activities; they would be even more informative if some details were provided about specific reasons of appeals and complaints and follow-up action taken on all complaints and suggestions (for the related comments, see ESG 3.6).

Panel suggestions for further improvement

1. In addition to the information already available, ACCUA could publish its protocol for handling complaints and suggestions in the complaints and suggestions section of the website.
2. The panel suggests that ACCUA include details about reasons for appeals and complaints and follow-up action taken on all complaints in its published annual reports on results and reports on complaints and suggestions.

Panel conclusion: compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

1. ESG 3.1: The agency conducted uninterruptedly its external evaluations throughout the hectic period of transition from AAC-DEVA to ACCUA, and since its recent establishment, has gained widespread support among its stakeholders for the changes initiated and its enhancement plans.
2. ESG 3.5: The commitment and professionalism of the staff and area coordinators are a valuable asset for ACCUA in moving ahead with its enhancement plans.
3. ESG 3.6: ACCUA invests great effort to compile and process data and publish findings from satisfaction surveys to demonstrate its accountability to the stakeholders.
4. ESG 2.2: ACCUA has made consistent efforts to streamline its evaluation processes and has a clear plan to support universities in the move from programme to institutional accreditation so as to reduce the burden of evaluations.
5. ESG 2.4: ACCUA has produced well-structured and comprehensive guides to support its evaluation committees.
6. ESG 2.4: The panel commends ACCUA for involving in its evaluations highly committed student experts.
7. ESG 2.5: ACCUA invests great effort to ensure consistency in the application of its evaluation criteria, with a key role of the Committees for Issuing Reports, and this is clearly reflected in its final evaluation reports.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, ACCUA is in compliance with the ESG. The panel found the agency to be compliant with ESG 3.1, 3.2, 3.3, 3.5, 3.6, 3.7, and 2.1, 2.2, 2.3, 2.4, 2.5, 2.6 and 2.7, and partially compliant with ESG 3.4.

The panel made the following recommendations:

1. ESG 3.1: ACCUA should swiftly proceed to the implementation of activities designed to support the universities in the move from programme accreditation to institutional accreditation.
2. ESG 3.1: As a matter of urgency, ACCUA should adopt more detailed and practical arrangements for the Governing Council to oversee the implementation of strategic plans.
3. ESG 3.1: ACCUA should hold regular meetings with students and continue building links with a wider range of social partners, outside its bodies and regular activities, as a way of promoting student involvement in quality assurance and as part of its ongoing efforts to further expand its engagement with stakeholders.
4. ESG 3.3: ACCUA should include in its internal regulations clear provisions for possible dismissal of members of its Governing Council before the end of their term of office.
5. ESG 3.3: To provide further safeguards for impartiality, ACCUA should propose to the Regional Minister that experts with high prestige be selected for the Governing Council through a public call or in consultation with the stakeholders.
6. ESG 3.4: ACCUA should devise clear annual plans for thematic studies, consult stakeholders outside its bodies to define their topics, and use its evaluation reports to produce thematic studies.
7. ESG 3.6: ACCUA should put in place formal performance appraisal procedures for staff, area coordinators and external evaluators.
8. ESG 3.6: ACCUA should establish a practice of documenting and tracking internal feedback.

9. ESG 2.3: ACCUA should include a site visit in programme verification and review of universities for recognition.
10. ESG 2.4: ACCUA should provide more in-depth training to student experts to ensure that even those with more limited experience are and feel fully competent to perform their tasks.
11. ESG 2.6: ACCUA should agree with the regional authorities arrangements for the publication of reports on reviews of universities for recognition.

SUGGESTIONS FOR FURTHER IMPROVEMENT

The panel made the following suggestions that can be considered by ACCUA for further enhancement of its activities:

1. ESG 3.1: ACCUA could involve international experts in the Technical Committee or seek their inputs on an ad-hoc basis in the process of reviewing its evaluation methodologies.
2. ESG 3.4: ACCUA could create teams composed of academic and QA experts, data analysts and staff to collect and analyse evidence from evaluation reports for thematic studies.
3. ESG 3.6: ACCUA could use findings from its satisfaction surveys for a more in-depth self-analysis and consistently document all improvements made.
4. SG 3.6: In addition to the QA documents already available, ACCUA could publish on its website a brief description of its internal QA system.
5. ESG 2.2: To ease the burden on universities, the panel suggests that ACCUA discuss within REACU the idea of creating a centralised electronic system for the collection of data required for programme evaluations, with a view to pursuing the matter with the national authorities.
6. ESG 2.4: In addition to public calls, ACCUA could search for prospective student experts in ways which will allow it to reach those who are less experienced or less active in internal quality assurance at their home universities.
7. ESG 2.4: The panel encourages ACCUA to involve in its evaluation committees practitioners from a wider range of sectors beyond higher education and research.
8. ESG 2.4: The panel encourages ACCUA to pursue vigorously its efforts to recruit more international experts.
9. ESG 2.4: In addition to the mandatory training already provided, the panel encourages ACCUA to organise refresher training sessions for all experts before each evaluation round.
10. ESG 2.5: ACCUA could consider compiling and publishing a list of criteria or indicators which must be met for a favourable decision in each evaluation process.
11. ESG 2.6: Alongside recommendations, the structure of evaluation reports could include examples of good practice which are worth rewarding and disseminating in the university system.
12. ESG 2.6: To facilitate the search for reports for uninitiated readers, ACCUA could consistently publish all reports in the sections of its website dedicated to the respective evaluation processes.
13. ESG 2.7: In addition to the information already available, ACCUA could publish its internal protocol for handling complaints and suggestions in the complaints and suggestions section of the website.
14. ESG 2.7: The panel suggests that ACCUA include details about reasons for appeals and complaints and follow-up action taken on all complaints in its published annual reports on results and on complaints and suggestions.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
3.04.2024: 1 st part of the panel's kick-off meeting			
1(a)	16.00-17.00	Review panel's kick-off meeting and preparations for site visit	<ul style="list-style-type: none"> • ENQA panel chair • ENQA panel secretary • ENQA panel member • ENQA panel student member • ENQA review coordinator
11.04.2024, online meeting with the agency's resource person and 2 nd part of the panel's kick-off meeting			
1(b)	10.00-11.00	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	ACCUA, Director ACCUA, Coordinator of the Functional Area of International Relations ACCUA, Technical Officer and review liaison person
2	11.00-11.30	Review panel's kick-off meeting and preparations for site visit	<ul style="list-style-type: none"> • ENQA panel chair • ENQA panel secretary • ENQA panel member • ENQA panel student member • ENQA review coordinator

23.04.2024 – Day 0 (pre-visit)			
4	15.00-16.00	A pre-visit meeting with the agency’s resource person to clarify any remaining questions after the online clarifications meeting	ACCUA Director ACCUA Coordinator of the Functional Area of International Relations ACCUA Technical Officer and review liaison person
3	16.00-17.00	Review panel’s pre-visit meeting and preparations for day 1	
24.04.2024 – Day 1			
	8.30-9.00	Review panel’s private meeting	
5	9.00-10.15	Meeting with ACCUA President, Director and Secretary General	President of the Governing Council (online) Director Secretary General Manager
	10.15-10.30	Review panel’s private discussion	
6	10.30-11.15	Meeting with the team responsible for preparation of the self-assessment report	Chief of Service for the support of the Technical Committee Technical Officer Technical Officer
	11.15-11.30	Review panel’s private discussion	
7	11.30-12.15	Meeting with members of the Governing Council	Secretary General for Universities, Regional Ministry of Universities, Research and Innovation. Full Professor at University of Córdoba. President of the Andalusian Institute of Agricultural, Fisheries, Agrifood and Organic Production Research and Training (IFAPA) Member of the Advisory Council of University Students of Andalusia

			Member of the Advisory Council of University Students of Andalusia
	12.15-12.30	Review panel's private discussion	
8	12.30-13.15	Meeting with the Coordinators of the five functional areas (Evaluation and Accreditation of Higher Education; Evaluation of Research, Development and Innovation Activities; Evaluation and Accreditation of Teaching Staff; Institutional Accreditation; International Relations)	Coordinator of the Functional Area of Institutional Accreditation. Coordinator of the Functional Area of International Relations. Coordinator of the Functional Area of Evaluation and Accreditation of Higher Education. Coordinator of the Functional Area of Evaluation of Research, Development and Innovation Activities. Coordinator of the Functional Area of Evaluation and Accreditation of Teaching Staff
	13.15-14.15	Lunch (panel only)	
9	14.15-15.15	Meeting with members of the Technical Committee	Full Professor at University of Cordoba (also a former member of the Technical Committee at AAC DEVA) Full Professor at University of Cordoba Full Professor at University of Jaen Full Professor at University of Granada Student at University of Sevilla Student at University of Jaen Full Professor at University of Córdoba (also a former member of the Technical Committee at AAC-DEVA)
	15.15-15.30	Review panel's private discussion	
10	15.30-16.15	Meeting with members of the Appeals Committees	President, University of Valladolid Secretary, University of País Vasco Academic, Public University of Navarra Academic, Polytechnic University of Madrid Academic, Complutense University of Madrid Academic, Full Professor at Universidad Rey Juan Carlos.

			Student, University of Salamanca Professional, PRODINTEC Foundation
	16.15-16.30	Review panel's private discussion	
11	16.30-17.15	Meeting with the persons responsible for the agency's internal quality assurance	Chief of Service for the support of the Technical Committee Technical Officer Technical Officer
12	17.15-17.45	Wrap-up meeting among panel members and preparations for day 2	
		Dinner (panel only)	

25.04.2024 – Day 2			
	8.00-8.30	Review panel's private meeting	
13	8.30-9.15	Meeting with the agency's staff	Five Technical Officers
	9.15-9.30	Review panel's private discussion	
14	9.30-10.45	Meeting with heads of some reviewed HEIs/ HEI representatives	Chancellor of the University of Córdoba Vice-Chancellor for Research and Scientific Dissemination, University of Malaga Vice-Chancellor of Quality Assurance, Teaching Innovation and Degree Studies, University of Granada Vice-Chancellor of Academic Planification, Loyola University of Andalusia Vice-Chancellor of Quality, Equality and Social Responsibility, International University of Andalusia
	10.45-11.00	Review panel's private discussion	
15	11.00-11.45	Meeting with quality assurance officers of HEIs	Director of the Area of Quality, Academic Innovation and Prospective at University of Granada Rector's Delegate for Quality Assurance, University Pablo

			<p>de Olavide Head of Service for Internal Quality Assurance, University of Huelva Head of Internal Quality Assurance at University of Málaga Chief of Service of Quality Assurance and Planification, University of Córdoba Head of Internal Quality Assurance, Loyola University Andalusia Director of the Quality Assurance Secretariat at the University of Jaén.</p>
	11.45-12.00	Review panel's private discussion	
16	12.00-13.00	Meeting with national experts / members of evaluation committees (representatives from the reviewers' pool)	<p>Expert (Ex-ante verification and modification), University of A Coruña. Expert (Ex-post re-accreditation verification), University of Salamanca Expert (Ex-ante verification and modification), Spanish National Research Council (CSIC) Expert (Follow-up and monitoring), University of Navarra Expert (Follow up and monitoring), University of León Expert (IMPLANTA), University of the Basque Country</p>
	13.00-14.00	Lunch (panel only)	
17	14.00-14.45	Meeting with international experts / members of evaluation committees (representatives from the reviewers' pool) (online)	<p>Expert (European Approach), Managing Director Fraunhofer IWES, Germany Expert (Ex-ante verification), Institut National des Sciences Appliquées - Toulouse, France Expert (European Approach), Director of Development ESITC-Paris, France</p>
	14.45-15.00	Review panel's private discussion	

18	15.00-16.00	Meeting with student experts / members of evaluation committees (representatives from the reviewers' pool) and representatives of CASEU (Advisory Council of University Students of Andalusia)	Student, Expert (Ex-post re-accreditation verification), Polytechnical University of Madrid Student, Expert (Follow-up and Monitoring), University of Córdoba Student, Expert (IMPLANTA), National Distance Education University Student, Expert (Ex-post re-accreditation verification), University of Santiago de Compostela Student, Expert (Ex-ante verification), University of Barcelona Student member of the Governing Council, member of CASEU Student member of the Technical Committee, member of CASEU
	16.00-16.15	Review panel's private discussion	
19	16.15-17.00	Meeting with stakeholders: employers / social and business partners	Managing Director of FUNDECOR - Foundation for the Development of Cordoba's Province President, Rabanales 21 Scientific-Technological Park Entrepreneur and Businessman and member of the Social Council of University of Córdoba Vice-President of the Córdoba Association of Young Entrepreneurs President of the Social Council of the University of Córdoba
20	17.00-18.00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
26.04.2024 – Day 3			
21	8.30-9.30	Meeting among panel members to agree on final issues to clarify	
22	9.30-10.30	Meeting with the ACCUA Director and key staff to clarify any pending issues	Director Secretary General

			Manager Chief of Service for the support of the Technical Committee Coordinator of the Functional Area of Institutional Accreditation
23	11.00-12.30	Private meeting between panel members to agree on the main findings	
	12.30-13.30	Lunch (panel only)	
24	13.30-14.00	Final de-briefing meeting with the Governing Council staff members of the agency to inform about preliminary findings	Governing Council and staff members

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Agency for Scientific and University Quality of Andalusia (ACCUA) by ENQA

Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN ACCUA, ENQA AND EQAR December 2023

1. Background and context

The Agency for Scientific and University Quality of Andalusia (ACCUA) was established on March 1, 2023, with the enforcement of Decree 17/2023, dated February 14, which approves its statutes. ACCUA was created through Law 9/2021, dated December 23, as an administrative agency under the regulations of the Regional Government of Andalusia. ACCUA is the legal successor of the Andalusian Agency of Knowledge, Directorate for Evaluation and Accreditation (AAC-DEVA).

ACCUA is competent for the evaluation and accreditation of university activities, as well as the evaluation and accreditation of research, development, and innovation activities within the Andalusian Knowledge System. Within its functions, ACCUA performs the ex-ante verification of study programmes, the follow-up of their implementation and their ex-post re-accreditation verification. The agency is also in charge of teaching staff accreditation and evaluates the quality of teaching, research and management activities of teaching staff. Its scope also includes the evaluation of proposals for research grants with the participation of expert panels from outside Andalusia.

The general purpose of all of the agency's activities is to promote the quality of the Andalusian Knowledge System, following international scientific and academic standards, as it aims to provide Universities, Higher Education Institutions, Research Institutions, and other agents with criteria and quality benchmarks that enable them to fulfil their social function.

ACCUA's external quality assurance activities cover all stages of verification of study programmes: ex-ante verification, ex-post re-accreditation, monitoring, modification, and recently also include European Approach for QA of Joint Programmes. At institutional level the agency's activities encompass the review of universities for recognition within the region of Andalusia, the institutional accreditation of higher education institutions, the accreditation of their internal quality assurance systems, the accreditation of institutions to evaluate foreign language skills according to the Common European Framework of Reference for Languages (CEFR), and the program DOCENTIA for teaching activity evaluation.

ACCUA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2000 and is applying for renewal of membership.

ACCUA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for the renewal of EQAR registration.

2. Purpose and scope of the review

This review will evaluate the extent to which ACCUA (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

This review will evaluate the extent to which ACCUA continues to fulfil the requirements of the ESG, taking into consideration that ACCUA became the legal successor of the Andalusian Agency of Knowledge, Directorate for Evaluation and Accreditation (AAC-DEVA) following a law issued by the Andalusian government.

2.1. Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency, that fall within the scope of the ESG, must be addressed in the external review:

- Accreditation of foreign language skills
- Accreditation of Quality Assurance Systems
- DOCENTIA program for teaching activity evaluation
- European Approach for QA of Joint Programmes
- Ex-ante verification of study programmes
 - Substantial modification of study programmes – the procedure and evaluation are the same as for the ex-ante the verification process. Nevertheless, it is expected to be addressed in the self-assessment report by ACCUA and addressed in the review report by the panel.
- Ex-post re-accreditation verification of study programmes
- Follow-up/monitoring of study programmes
- Institutional accreditation
- Modification of study programmes (non-substantial modifications)
 - Successive Academic Programmes – PARS – The PARS procedure is a slight variation of the current Modification of Study Programmes nevertheless, it is expected to be addressed in the self-assessment report by ACCUA and addressed in the review report by the panel (under ESG 2.3).
- Reviews of universities for recognition

2.2. Standards affected by substantive changes

This review should specifically address the changes made in the agency, see [Decision on the Substantive Change Report from 2023-06-30](#). In particular the self-assessment report and the review report should address the following:

- Organisational changes (ESG 3.1, ESG 3.2, ESG 3.3)
 - consider the structural changes of ACCUA compared to its predecessor AACDEVA
- Staffing and financial situation (ESG 3.5)
- Strategic plan and procedures (ESG 3.1, ESG 2.2)
 - consider the development of ACCUA's strategic plan
 - address whether the existing procedures (of its predecessor) have not sustained any substantial changes.

Should any substantive changes occur in ACCUA between now and the review (e.g., organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between ACCUA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website²);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1. Nomination and appointment of the review panel

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested). One of the members serves as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

² The agency is encouraged to publish the ToR on its website as well.

3.2. Self-assessment by the agency, including the preparation of a self-assessment report

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
 - o a brief description of the HE and QA system;
 - o the history, profile, and activities of the agency;
 - o a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
 - o opinions of stakeholders;
 - o the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
 - o reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
 - o a SWOT analysis;
 - o reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3. A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
The specific quality assurance system to which the agency belongs;
The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

3.4. Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind *EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*³ to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

³ Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	December 2023
Appointment of review panel members	January 2024
Self-assessment completed	12 January 2024
Screening of SAR by ENQA Review Coordinator	January 2024
Preparation of the site visit schedule and indicative timetable	February 2024
Briefing of review panel members	March 2024
Review panel site visit	April 2024
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	May 2024
Draft of review report to be sent for a factual check to the agency	June 2024
Agency statement on the draft report to the review panel (if necessary)	June 2024
Submission of the final report to ENQA	July 2024
Validation of the review report by the Agency Review Committee	September 2024
Publication of report	September 2024
EQAR Register Committee meeting and initial consideration	Autumn 2024
Decision on ENQA membership by the ENQA Board	March 2025

ANNEX 3: GLOSSARY

AAC-DEVA	Andalusian Agency of Knowledge, Department of Evaluation and Accreditation
ACCUA	Agency for Scientific and University Quality of Andalusia
ANECA	National Agency for Quality Assessment and Accreditation of Spain
CASEUA	Advisory Council of University Students of Andalusia
CoARA	Coalition for the Advancement of Research Assessment
CoU	Council of Universities
CRUE	General Conference on University Policy
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
ESU	European Students' Union
GAIN	Global Academic Integrity Network (GAIN).
LO	learning outcome
PARS	Successive Academic Programmes or Academic Programmes with Successive Pathways
R&D&I	Research, development and innovation
REACU	Spanish Network for Quality Assurance in Higher Education
RUCT	Register of Universities, Centres and Degrees
QA	quality assurance
QAS	quality assurance system
SAR	self-assessment report
ToR	terms of reference

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ACCUA

Self-assessment report

Documents to which links were provided in the SAR and additional written pre-visit clarifications, and documents published on the ACCUA website:

Legislation

- Organic Law 2/2023
- Royal decree 640/2021 on the creation, recognition, and authorization of universities and university centres, and institutional accreditation of university centres
- Resolution of 3 March 2022 of the General Secretariat of Universities, by which instructions are issued on the procedure for the institutional accreditation of public and private university centres and the Protocol for the certification of internal quality assurance systems of university centres and the Protocol for the evaluation procedure for the renewal of the institutional accreditation of university centres
- Royal Decree 822/2021 establishing the organisation of university education and the quality assurance process
- Law 9/2021, of 23 December, which creates the Business Agency for Economic Transformation and Development (TRADE) and the Agency for Scientific and University Quality of Andalusia (ACCUA)
- Decree 17/2023, of 14 February, approving the Statutes of the Agency for Scientific and University Quality of Andalusia (ACCUA)
- Articles of the following national and regional legislative acts applicable to the appointment and dismissal of the Director of ACCUA as a senior official in a public administrative agency: Law 19/2013 of 9 December 2013 on transparency, access to public information and good governance; Law 3/2005 of 8 April 2005 on incompatibilities of senior officials of the Administration of the Regional Government of Andalusia and declaration of activities, assets and interests of senior officials and other public officials; Law 9/2007 of 22 October 2007 on the Administration of the Government of Andalusia; Law 1/2014 of 24 June 2014 on Public Transparency of Andalusia.
- Announcements on the public competition for the appointment of the head of the Directorate of the Agency for Scientific and University Quality of Andalusia (ACCUA), and the results of the competition

ACCUA's documents

- Statutes
- 2023-2026 Initial Action Plan
- 2024 Annual Action Plan
- Service Charter
- Code of Ethics
- Quality Manual
- University Programmes: Appeals Procedure
- Internal protocol for the processing of complaints, suggestions and congratulations and other types of messages on the quality of services
- Selection and Appointment of Evaluators
- Support Guide for the Preparation of the Verification Report of Official Doctoral Programmes
- Support Guide for the Drafting of Verification Reports for Official University Degrees (Bachelor's and Master's Degrees)

- Evaluation protocol for modification of higher education study plans leading to the achievement of university official Bachelor and Master degrees (REACU)
- Protocol for the Assessment of Academic Programmes with Successive Courses in the Field of Engineering and Architecture (PARS-IA) (REACU)
- Protocol for Monitoring Bachelor's, Master's and Doctorate University Degrees
- Guide to Reaccreditation of Bachelor's, Master's and Doctoral University Degree Programmes in Andalusia
- Guide for the Evaluation of International Joint Programmes within the European Approach Framework for Quality Assurance
- Guidelines for the Certification of the Accreditation Procedure for Foreign Language Proficiency Certification at Andalusian Universities
- Guide for the Certification and Monitoring of Quality Assurance Systems Implemented in Andalusian University Centres – IMPLANTA-QASC Programme
- Evaluation Guide for the Recognition of Universities and University-Affiliated Centres
- DOCENTIA Programme
- Thematic analysis reports: Academic Integrity in Andalusian Public Universities: Regulatory Framework and Proposed Actions; Thematic Study on the Employment Outcome of Graduates from the Nursing Degree in Andalusia; Thematic Study on the Employment Outcome of Graduates from the Tourism Degree in Andalusia; DEVA-AAC Proposals for a Reform of the University Teaching Staff Accreditation System; Report on the Adaptation of Andalusian University Degrees to the COVID-19 Pandemic
- A sample of evaluation reports: two reports for each evaluation / accreditation / review process
- Evaluation report on European Transcultural Studies (an international joint programme) produced by AQAS (*Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen*) and recognised by ACCUA, and ACCUA's recognition report
- A sample of reports on results: two reports for programme verification, follow-up, non-substantial modification, PARS and reaccreditation, and a report on results for the evaluation of an international joint programme
- 2021, 2022 and 2023 Reports on complaints, suggestions, congratulations and other types of messages related to the quality of the service

OTHER SOURCES USED BY THE REVIEW PANEL

- Website of the Regional Government of Andalusia: Announcements on the public competition for the appointment of the head of the Directorate of the Agency for Scientific and University Quality of Andalusia (ACCUA) and the outcome of the competition
- Website of the Regional Parliament of Andalusia

ENQA AGENCY REVIEW 2024

THIS REPORT presents findings of the ENQA Agency Review of the Agency for Scientific and University Quality of Andalusia (ACCUA), undertaken in 2024.

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European Association for
Quality Assurance in Higher Education