

ENQA AGENCY REVIEW

# NATIONAL AGENCY FOR THE EVALUATION OF UNIVERSITIES AND RESEARCH INSTITUTES (ANVUR)

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## EXECUTIVE SUMMARY

The External Review Report documents the process, findings, and outcomes of a review of the compliance of the **National Agency for the Evaluation of Universities and Research Institutes** (Agenzia Nazionale di Valutazione del Sistema Universitario e della Ricerca, **ANVUR**) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG).

ANVUR is a public body responsible for evaluating Italy's higher education and research institutions since it was established in 2010. Between 2019 and 2023, ANVUR completed more than 7,000 implementations of its procedures with more than 250 institutions across 11 different external quality assurance activities within the scope of the ESG. This range and volume of activity is at the busier end of the scale for European quality assurance agencies but still only represents a portion of ANVUR's total activity, including facilitating Italy's national research assessment exercise every five years.

This is ENQA's second review of ANVUR. The review has been conducted to inform ANVUR's application for renewal of its European Association for Quality Assurance in Higher Education (ENQA) membership and its application for registration with the European Quality Assurance Register (EQAR).

The review was undertaken by a panel of four peer experts ('**the review panel**', here within), with support from ENQA, between November 2023 and June 2024. The review was centred around a site visit to ANVUR in Rome between 22 and 24 January 2024. This forms part of a longer 12-month process that commenced with ANVUR's production of a Self-Assessment Report.

The review panel has reached the following judgements about ANVUR's compliance with the ESG:

<u>ESG</u>	<u>Judgement</u>
3.1 Activities, policy, and processes for quality assurance	Compliant
3.2 Official status	Compliant
3.3 Independence	Partially compliant
3.4 Thematic analysis	Compliant
3.5 Resources	Compliant
3.6 Internal quality assurance and professional conduct	Compliant
3.7 Cyclical external review of agencies	Compliant
2.1 Consideration of internal quality assurance	Partially compliant
2.2 Designing methodologies fit for purpose	Compliant
2.3 Implementing processes	Compliant
2.4 Peer-review experts	Compliant
2.5 Criteria for outcomes	Compliant
2.6 Reporting	Partially compliant
2.7 Complaints and appeals	Compliant

Considering the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, **ANVUR is in compliance with the ESG**. This review informs ANVUR's applications for membership of ENQA and registration with EQAR and also supports its continued enhancement. To inform that enhancement, the review panel has identified 8 commendations, 14 recommendations, and 13 suggestions for further improvement. These can be found throughout the report and [are summarised in the conclusion](#).

# INTRODUCTION

This report analyses the compliance of the National Agency for the Evaluation of Universities and Research Institutes (Agenzia Nazionale di Valutazione del Sistema Universitario e della Ricerca, 'ANVUR' hereafter) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted over several months through 2023 and 2024. The review has been conducted to inform ANVUR's application for renewal of its European Association for Quality Assurance in Higher Education (ENQA) membership and its application for registration with the European Quality Assurance Register (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.

ANVUR first underwent a review by ENQA in 2019, which resulted in ENQA membership being approved, but registration with EQAR was declined at that time. ANVUR engaged with the follow-up reporting and a Progress Review by ENQA but chose not to pursue a further focused review in the interim period.

As this is ANVUR's second 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 to constantly enhance the agencies.

### SCOPE OF THE REVIEW

The Terms of Reference for this review agreed jointly by ANVUR, ENQA, and EQAR determined the following activities of the agency as within the scope of the European Standards and Guidelines and, therefore, in scope for this review:

1. initial accreditation of new universities and their proposed study programmes
2. initial accreditation of new Schools of Advanced Studies and their proposed PhD programmes
3. initial accreditation of new university study programmes (including those offered in decentralised branches)
4. initial accreditation of new PhD programmes
5. periodic assessment of universities and their study programmes (including PhD programmes)
6. initial accreditation of new private AFAM institutions and their proposed study programmes
7. initial accreditation of new AFAM study programmes
8. initial accreditation of decentralised branches of AFAM institutions and their proposed study programmes
9. periodic assessment of AFAM institutions and their study programmes (private institutions; pilot procedure for public institutions)
10. Coordination of the University Evaluation Boards<sup>1</sup>
11. Coordination of AFAM Evaluation Boards<sup>2</sup>

<sup>1</sup> This activity is not an external QA activity but addresses aspects that are transversal to the agency's quality assurance activities related to Universities and AFAM and, therefore, should be taken into consideration under the corresponding standards, i.e. ESG 3.4 and ESG 3.6.

<sup>2</sup> See previous note.

### **Activities outside the scope of the ESG**

The following activities are outside the scope of the ESG and not relevant to the application for inclusion in EQAR, but the review panel may comment on them as they see fit:

- Periodic evaluation of the quality of research and “third mission” outcomes (VQR).
- Definition of minimum standards of research production for the National Scientific Qualification.
- Classification of scientific journals in humanities and social sciences.
- Development and administration of tests on students' disciplinary and transversal skills.
- The setting of standards of administrative performance for HEIs and research institutes.

### MAIN FINDINGS OF THE 2019 REVIEW

ANVUR's first external review by ENQA concluded in 2019, with the site visit in November 2018 and subsequent consideration of the outcomes by ENQA and EQAR through 2019. Using the 2015 ESG and the ENQA Guidelines for Agency Reviews in place at the time (with four possible levels of compliance: fully, substantially, partially, not), the review panel reached the following judgements:

**Fully compliant:** 3.2 Official status; 3.7 Cyclical external review of agencies; 2.5 Criteria for outcomes.

**Substantially compliant:** 3.1 Activities, policy, and processes for QA; 3.3 Independence; 3.4 Thematic analysis; 3.5 Resources; 3.6 Internal quality assurance; 2.2 Designing methodologies fit for purpose; 2.3 Implementing processes; 2.7 Complaints and appeals.

**Partially compliant:** 2.1 Consideration of internal quality assurance; 2.4 Peer-review experts; 2.6 Reporting.

The EQAR Register Committee agreed with the ENQA review panel's judgements, except for standard 2.7 (Complaints and appeals), which it judged to be partially compliant, and standard 3.1 (Activities, policy and processes for QA), which it judged to be (fully) compliant following the receipt of additional information from ANVUR.

Overall, the following conclusions and decisions were reached in 2019:

- The ENQA review panel was satisfied that ANVUR was compliant with the ESG overall.
- The ENQA Board was satisfied that ANVUR was compliant with the ESG overall and granted ANVUR membership to ENQA. The Board explicitly noted several areas where further improvement needed to be demonstrated by ANVUR over time.
- The EQAR Register Committee could not conclude that ANVUR complies substantially with the ESG as a whole and rejected their application for inclusion on the Register.

### REVIEW PROCESS

The 2024 external review of ANVUR 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 ANVUR (the review panel) was appointed by ENQA and composed of the following members:

- **Dr Maiki Udam** (Chair), Head of Higher Education, Estonian Quality Agency for Education (HAKA), Estonia (ENQA nominee)
- **Dan Derricott** (Secretary), Director of Education Policy and Quality, University of Warwick, United Kingdom (ENQA nominee)
- **Professor Manel Jiménez-Morales**, Vice-Rector for Alliances, Community and Culture, Open University of Catalonia, Spain (EUA nominee)
- **Liv Teresa Muth**, PhD student in Industrial Biotechnology, Ghent University, and Member of the European Students' Union Quality Assurance Student Experts Pool, Belgium (ESU nominee)

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

### **Self-assessment report**

ANVUR began work on its self-assessment report in November 2022, using the 11 months ahead of submission to iteratively form a rounded view of its compliance with the ESG and its broader organisational strengths and weaknesses. An internal working group was formed from the outset, drawing together the responsible Governing Board member, the Director of ANVUR, a range of staff, and an external consultant to provide additional capacity. The working group guided several stages of engagement with internal and external stakeholders, from which the first complete draft was produced by August 2023, and further versions were refined before submission to ENQA in October 2023. The self-assessment report and its supporting appendices were checked for completeness by the review coordinator and then shared with the review panel on 15 November 2023.

The review panel considers the self-assessment comprehensive, helpful, and self-critical. While some gaps resulted in requests for further evidence early in the review process, they relate to areas where ANVUR can further strengthen its compliance with the ESG (discussed through this report) or to complexity inherent in the Italian higher education system rather than a weakness or deliberate omission in the self-assessment report.

### **Site visit**

Following the desk-based analysis of the self-assessment report and supporting evidence and advance online meetings with ANVUR staff to clarify the context of the Italian system, the review panel undertook a site visit to ANVUR's offices in Rome between 22 and 24 January 2024.

The review panel held a total of 17 meetings over two and a half days with more than 90 people from the agency's Governing Board and staff, external experts undertaking external QA procedures for ANVUR, universities and AFAM institutions evaluated by ANVUR, the Ministry of University and Research (MUR), national representative bodies, and volunteers involved in ANVUR's governance structures (Advisory Board, Guarantee Committee, Working Groups). All meetings were held in person at ANVUR's offices, and each provided an open, reflective, and insightful contribution to the review's findings. The [full site visit schedule is included in Annex I](#).

### **Acknowledgements**

The review panel wishes to recognise ANVUR's outstanding engagement with the review process. The same applies to the many external stakeholders who freely gave their time to meet in such significant numbers. The responsiveness to requests for information, the patience demonstrated in explaining the nuances of the Italian system, and the warm welcome on-site in Rome all made a complex review easier to navigate and ultimately more productive.

Particular thanks must go to Marilena Maniaci, Governing Board member, and Daniele Livon, Director of ANVUR, as the review panel's primary points of contact throughout the review process, the

ANVUR staff behind the scenes supporting the supply and translation of documents and the logistics of the site visit, and Giulia Carletti and Francesca Gnana, who supported with simultaneous interpretation during the site visit.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

The higher education system in Italy is large, well-established, and diverse in its makeup. The system comprises universities and schools of advanced studies (focused on doctoral programmes), as in many other countries, which are known as the university sector. Distinctively, the system also includes higher education institutions for Fine Arts, Music, and Dance – known as the AFAM sector. Beyond education, specialist public research bodies (such as the Italian Space Agency) operate alongside higher education institutions in the research domain and fall under ANVUR’s remit for research assessment.

ANVUR’s self-assessment report summarises the scale of the higher education system as of 2023:

Institutions (258 total)	University Sector (99 total)	State	Universities	61
			Schools of Advanced Studies	7
		Private		31
	AFAM Sector (159 total)	State		86
		Private		73
Students	University Sector			2,000,000+
	AFAM Sector			c. 80,000
Staff	University Sector	Teaching staff		60,000
		Administrative staff		55,000
	AFAM Sector	Teaching staff		8,500+
		Administrative staff		c. 3,500

A single Italian Qualifications Framework was approved in 2010 and encompassed the full range of recognised higher education qualifications across the University and AFAM sectors. The Framework was, in part, a direct response to the development of the Qualifications Framework for the European Higher Education Area and aligned with the three-cycle system of three-year bachelor’s degrees (EQF L6), two-year master’s degrees (EQF L7), and doctorates lasting between three to four years (EQF L8). The Italian “credito formativo universitario” (CFU) framework aligns with the European Credit Transfer and Accumulation System (ECTS) and ensures the total credits of each degree in the three-cycle system and the total student workload in each academic year are comparable to European norms.

Alongside traditional degrees, some universities offer lifelong learning professional courses for upskilling and reskilling, known as first- and second-level Professional Masters. These courses are broadly aligned to first cycle (bachelor’s) and second cycle (master’s) degrees in the Italian Qualifications Frameworks but do not lead to those qualifications and are not within ANVUR’s remit.



## 2010 reforms in the University sector

Notably home to the oldest university in the Western world<sup>1</sup> still in continuous operation and several other ancient universities, there is, in one sense, a great deal of history, maturity, and resilience in the Italian system. However, all higher education systems need evolution and renewal, and the Italian system is no exception. Major legislative reforms to the University sector in 2010 introduced regulatory frameworks, incentives, and new state actors (notably ANVUR) aimed at improving the quality of education and research and increasing the system's efficiency. In part, these changes sought to reverse trends whereby a lower proportion of 25–34-year-old Italians held a tertiary degree, compared to most OECD countries, and whereby relatively few students from other countries chose to study in Italy (contrasted with the relatively high and more rapidly rising proportion of Italian students choosing to study abroad)<sup>2</sup>. The drive for efficiency came in the wake of the 2008 global financial crisis, which impacted Italy severely and remains a significant contextual factor in the largely state-funded Italian higher education system we find today.

## AFAM sector

The 159 institutions dedicated to teaching, artistic production, and research activities in the fields of fine arts, music, and dance are collectively known as AFAM institutions. They comprise fine arts academies, music conservatoires, national or dance and dramatic arts academies, and specialist institutions in design, fashion, theatre, and new technologies. AFAM institutions are diverse in size and character but have collectively experienced notable growth in enrolments in the last five years and have a higher proportion of international students (15.7%) than universities (5%). Since a legislative change in 1999, higher education programmes and qualifications from AFAM institutions have been aligned with the Bologna process, the three-cycle degree structure and the credit framework outlined above. Degrees awarded by AFAM institutions are comparable in structure and equivalent in status to degrees awarded by universities.

The same 1999 Law (no. 508/1999) additionally legislated broader principles for organising the AFAM sector and directed the responsible Ministry to develop and adopt regulations for evaluating the quality of provision in AFAM institutions. 25 years later, that regulation has still not been put into place by the government and is only now beginning to be drafted with assistance from ANVUR. Presidential and Ministerial Decrees (PD no. 212/2005, MD no.14/2018, MD no. 1214/2021, MN no.1071/2021) in the meantime have sought to regulate some aspects of quality assurance and assigned duties to ANVUR, but there is not yet a comprehensive and fit-for-purpose regulatory framework setting out arrangements for the quality assurance of higher education delivered by AFAM institutions. In practice, this means that private AFAM institutions must have first- and second-cycle programmes accredited and must undergo periodic assessment by ANVUR. However, public AFAM institutions are only required to seek accreditation for second-cycle programmes and decentralised branches and are not required at all to undergo periodic assessments. These gaps in regulation were the root cause of several concerns expressed by the 2019 ENQA review of ANVUR, and the same gaps largely remain at the time of this 2024 review.

## QUALITY ASSURANCE

Public and private higher education institutions, both in the University and AFAM sectors, are to varying extents all required by law to engage with external quality assurance to access state funding, award recognised degrees and enjoy formal recognition. The principal regulatory tool used is the requirement that programmes and institutions be accredited by the responsible government ministry, currently MUR. As discussed above, there are different laws and regulations in force for different parts

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<sup>1</sup> <https://www.unibo.it/en/university/who-we-are/our-history/nine-centuries-of-history/nine-centuries-of-history>

<sup>2</sup> <https://www.oecd-ilibrary.org/sites/88570a37-en/index.html?itemId=/content/component/88570a37-en>

of the system and some recognised gaps in the regulatory framework, which creates an uneven and often complex set of expectations for which programmes and institutions must be accredited by MUR.

Where laws and regulations are in place, they can be characterised as understandably technical and legalistic, but also as very detailed in parts where they describe specifically the evaluation criteria and processes to be used in external quality assurance processes that inform accreditation decisions. The implications of this for implementing and evolving the quality assurance system are discussed throughout this report and form a major theme in the findings.

Except for laws reforming qualifications structures (discussed above), many of the most relevant laws and regulations governing quality assurance today have been introduced since 2010. As already noted, the 2010 reforms and law established ANVUR as an independent body with statutory responsibilities for the evaluation of the quality of teaching and research in Italian higher education. ANVUR is the only such quality assurance agency in Italian higher education and is specifically tasked in law with making recommendations to MUR on whether to grant accreditation.

## ANVUR

The National Agency for the Evaluation of Universities and Research Institutes (Agenzia Nazionale di Valutazione del Sistema Universitario e della Ricerca, **ANVUR**) was established in 2010 and began to operate in 2011. As discussed above, the introduction of ANVUR was part of a wider package of reforms to enhance the quality of teaching and research in Italian higher education. It is an independent public body and a legal entity with organisational and financial autonomy but cooperates closely with MUR in fulfilling their respective and related duties.

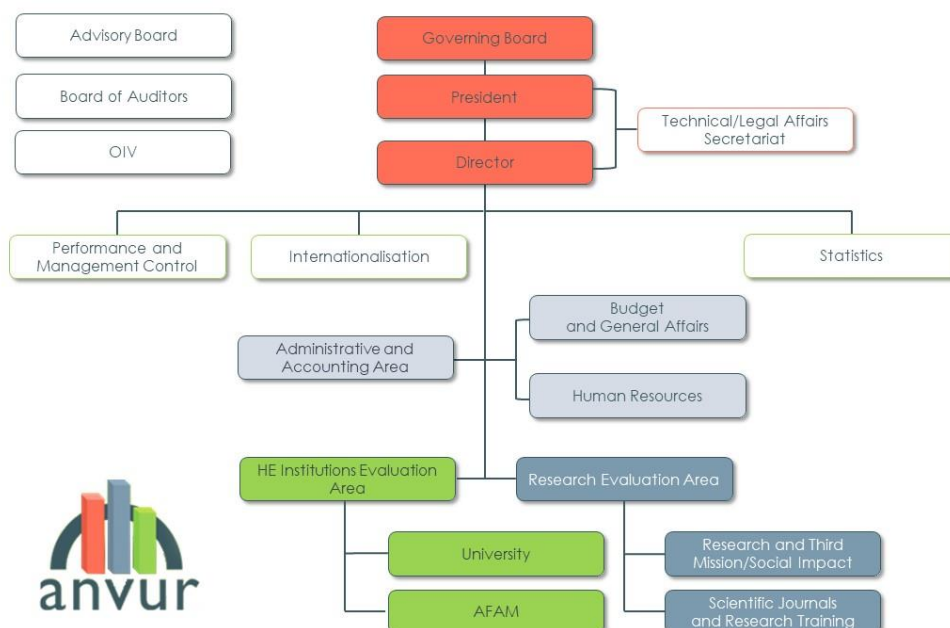
ANVUR [sets out its function on its website](#) as:

“The Agency for the Evaluation of the University and Research System (ANVUR) supervises the national public system for evaluating the quality of universities and research institutions. It takes care of the external evaluation of the quality of the activities of the Universities and Research Institutions receiving public funding and directs the activities of the Evaluation Units. Finally, it evaluates the effectiveness and efficiency of public funding and incentive programs for research and innovation activities.”

ANVUR has been a member of ENQA since June 2019.

## ANVUR'S ORGANISATION AND STRUCTURE

ANVUR's responsibilities involve reaching evaluation decisions about a range of teaching, research, and related activities and about a range of types of higher education and research institutions. These decisions and the organisation's strategy are determined by ANVUR's **Governing Body** – led by the **President**. The Governing Board is supported by a growing body of **staff** – led by the **Director** – responsible for operationalising its many activities that lead to these decisions and for the smooth day-to-day running of the organisation. The Governing Board, Director, and staff of ANVUR are supported and held accountable by a range of supporting governance and advisory boards, most notably the **Advisory Board** and **Guarantee Committee**. This high-level organisation of the agency, as well as details of the top-level internal departments (HEIs Evaluation, Research Evaluation, Administrative and Accounting) and the total number of staff, are prescribed in law (Presidential Decree no.76/2010, Decree-Laws no.1/2020 and no.44/2023).



The **Governing Board** of ANVUR is ultimately accountable for the governance and operation of the agency. The Governing Board additionally serves as the decision-making body approving the specification of external QA activities and determining the formal outcomes of the activities for individual institutions and programmes. Members of the Governing Board are employed full-time by the agency and remunerated accordingly as senior public officials. In practice, this means each member fulfils an executive role with a portfolio of responsibilities (for example, leading research assessment or internationalisation) and cannot hold other roles outside of ANVUR at the same time.

A maximum of seven members of the Governing Board are appointed by the President of the Italian Republic upon the recommendation of the Minister of University and Research, following a public call administered by an international committee. There are currently five members of the Governing Board appointed to a non-renewable mandate for six years (extended from four years previously), all of whom have backgrounds as senior academics and institutional leaders in Italian universities. While one member of the Governing Board is responsible for leading ANVUR’s work concerning AFAM institutions, no member of the Board has experience working directly in the AFAM sector.

The **President** is chosen by the Governing Board from among its membership and they serve as the Board’s chairperson and ANVUR’s figurehead and legal representative.

The Governing Board appoints a **Director** (Director General) of ANVUR on a renewable mandate. The Director is responsible for managing the internal operations of the agency and executing the resolutions adopted by the Governing Board.

In turn, the Director appoints the **staff of the agency**, to deliver the operational responsibilities of the agency and ensure the Governing Board has robust evaluation outcomes available to inform its decision-making and recommendations to MUR. ANVUR’s status as a public body means that its staff, including the Director, are civil servants of the Italian state and are employed as such within Italy’s public administration frameworks. ANVUR’s staff is undergoing an extended period of growth both to relieve the pressures of being set up in a very lean way during a time of austerity and to reflect an increased range of responsibilities. The Government approved an increase from 35 to 45 permanent staff in 2020 (not including the Director or Governing Board) and a further increase in 2023 from 45

to 60 staff. At the time of the review, ANVUR had 38 staff in post and was working to gradually recruit many vacant and new posts. While the self-assessment report noted that all 60 staff would be in place by mid-2024, the review team learned during the site visit that a more realistic estimate was that 50 staff would be in post by the end of 2024 and all 60 staff by the end of 2025. While ANVUR would like to move faster, the competitive labour market and constraints of civil service recruitment processes and pay frameworks make it challenging to secure appropriately qualified staff.

The Governing Board and staff engage regularly with six supporting bodies and committees that advise and provide assurance around ANVUR’s execution of its responsibilities:

- An **Advisory Board** of 20 external stakeholders Advisory Board to offer opinions and suggestions to the Governing Board concerning the agency’s strategies, planned activities, evaluation criteria, methods, and procedural documents.
- A **Board of Auditors** of three government-appointed members to ensure the proper management of financial resources and compliance with ANVUR’S accounting procedures.
- An **Independent Performance Assessment Body (OIV)** - a single-member entity common in Italian public administration – to strategically monitor and control the administrative performance, transparency and integrity of internal controls of the agency.
- An independent complaint committee, the **Guarantee Committee**, consisting of five external members to address and investigate appeals and complaints lodged against ANVUR’s evaluation procedures, ensuring a fair and impartial process.
- An **Equal Opportunities Committee (CUG)** of four members, including representatives from trade unions as well as officers from the agency itself, to promote the principles of equal opportunities and foster the creation of a positive and inclusive work environment.
- A **Board of Guarantors of the Code of Ethics**, composed of two members from the Governing Board and an external legal expert as the chairperson, interprets the Code of Ethics, ensures its application and takes appropriate measures if any violations or discrepancies are identified.

## ANVUR’S FUNCTIONS, ACTIVITIES, PROCEDURES

ANVUR has a wide range of functions compared to other quality assurance agencies in Europe, covering the evaluation of institutions in the round (across education, research, administration and the third mission), the evaluation of proposed new institutions and programmes, the coordination of Evaluation Boards, the national assessment of research quality every five years, the evaluation of academics applying to permanent full and associate professor positions in Italian universities, the classification of scientific journals, and the (currently experimental) testing of students’ disciplinary and transversal skills. For an agency with just 38 staff at present, the breadth and scale of these activities are especially impressive.

ENQA, EQAR, and ANVUR have agreed that nine of ANVUR’s External Quality Assurance (EQA) activities relate to education and are entirely within the scope of the European Standards and Guidelines (ESG). Two EQA activities are partially within the scope of the ESG. (see [Terms of Reference in Annex 2](#)).

EQA Activity	Description
<u>Fully in scope of the ESG</u>	
I Initial accreditation of new universities and	An assessment of whether proposals for new universities meet the requirements of MUR. This activity only occurs when MUR

<b>EQA Activity</b>	<b>Description</b>
their proposed study programmes	opens a new round of applications, which last occurred between 2019-2021.
2 Initial accreditation of Schools of Advanced Studies	A rounded assessment of the school's governance, strategic plan implementation, planning of the training programme, financial and human resources, and facilities. Initiated in 2019, existing schools have all undergone this procedure and come under the purview of ANVUR.
3 Initial accreditation of new university study programmes (including those offered in decentralised branches)	A focused assessment of proposals for new programmes, typically during a January to June window each year. The assessment considers the merits of the business case and design of the programme, and compliance with MUR criteria for accreditation.
4 Initial accreditation of new PhD programmes	A focused assessment of proposals for new programmes each year. Accreditation is granted for five years, and an annual verification exercise confirms ongoing compliance. Assessments have until now been carried out by ANVUR staff, but external experts will be introduced from the next annual cycle following a change to regulation by the Ministry in 2021.
5 Periodic assessment of universities and their study programmes (including PhD programmes)	A rounded assessment five years after initial accreditation and every five years after that. A team of 7-30 experts evaluates the breadth of institutional activity, including its study programmes, and its financial sustainability against a series of evaluation criteria. The outcomes are graded rather than binary, ranging from fully satisfactory to not satisfactory.
6 Initial accreditation of new private AFAM institutions and their proposed study programmes	An assessment of whether proposals for new private AFAM institutions meet the requirements of MUR. This is predominantly a desk-based analysis by external experts, with a site visit added only when required.
7 Initial accreditation of new AFAM study programmes	A focused assessment of proposals for new programmes each year. The assessment considers the merits of the business case and design of the programme, and compliance with MUR criteria for accreditation.
8 Initial accreditation of decentralised branches of AFAM institutions and their proposed study programmes	A focused assessment of the spaces, facilities and financial sustainability of additional sites proposed by existing institutions. The first such request was in progress during this ENQA review.
9 Periodic assessment of AFAM institutions and their study programmes (private institutions;	A rounded assessment two and five years after the initial accreditation, and every five years after that. A team of experts

<b>EQA Activity</b>	<b>Description</b>
pilot procedure for public institutions)	<p>evaluates the institution's ongoing compliance with the initial accreditation criteria.</p> <p>A more developmental and holistic methodology, like that used in the periodic assessment of universities, has been piloted with three public AFAM institutions. ANVUR intends to adopt this methodology for all AFAM institutions, subject to MUR implementing a regulatory framework for AFAM institutions.</p>

Partially in scope of the ESG

10	Coordination of the University Evaluation Boards (as a transversal activity)	Evaluation Boards are appointed by each institution and are an internal quality assurance activity but must mostly comprise external members and fulfil statutory duties in respect of quality assurance. ANVUR advises MUR on those statutory duties, publishes guidance and reporting templates to fulfil those duties, convenes supportive networks of Evaluation Board Presidents, members and officers, and uses the annual reports of these boards in its own external QA activity.
11	Coordination of the AFAM Evaluation Boards	

The number of times each EQA activity (fully in scope) has been delivered is as follows:

	2019	2020	2021	2022	2023
Initial accreditation new universities	0	0	8	2	0
Initial accreditation SAS	2	4	1*	0	0
Initial accreditation new study programmes	136	196	186	209	238
Initial accreditation of new PhD programmes	993	1025	1055	1152	1219
Periodic accreditation universities and study programmes	19	7	11	1**	3
Initial accreditation new private AFAM institutions	26	33	19	18	12
Initial accreditation of new AFAM study programmes	80	116	136	126	123
Initial accreditation of decentralised branches of AFAM institutions	/	/	/	/	/
Periodic accreditation of private AFAM institutions	10	10	13	13	14
Periodic accreditation of public AFAM institutions (pilot)	/	/	/	/	3

\* This refers to the evaluation of the SSM (Scuola Superiore Meridionale), which was not intended to grant accreditation but rather, under MUR request, to evaluate SSM' capacity to enter in the SAS system after a three-year experimental period.

\*\* Follow-up Visit to IUL University (Florence)

After this ENQA review concludes, a further activity within the scope of the ESG will commence in 2024: the periodic assessment of Schools of Advanced Studies. This activity is still to be developed by the agency once the Ministerial decree no. 439/2013 has been revised and, as such, was not ready to be included within the scope of this review.

ANVUR does not provide consulting or other advisory services to institutions and does not currently operate outside of Italy except for assessments of branch campuses of Italian institutions.

### ANVUR'S FUNDING

ANVUR is predominantly funded (99%) by the Italian state. This is mainly in the form of recurrent state funding determined and fixed by Parliament in the State budget allocated to MUR, totalling around €7.7mn per annum for the four years to 2022. MUR supplements this with ministerial funding specific to time-limited activities that it tasks ANVUR with, most notably the five-yearly national research assessment exercise (VQR). In the four years to 2022, ANVUR's total income ranged between €8.1mn and €10.3mn per annum.

ANVUR's most valuable asset is its people and the profile of its expenditures reflects this, with more than two-thirds of costs relating to the Governing Board, permanent staff salaries, contracted staff, and external experts. Much like ANVUR's income, the profile of this expenditure fluctuates when it undertakes the research assessment exercise, but otherwise, ANVUR's finances appear consistent, stable, and predictable, enabling it to plan ahead.

# FINDINGS: COMPLIANCE OF ANVUR 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

“The panel recommends to ANVUR’s Management Team to explore ways enabling to increase the strategic involvement of the Advisory Board.”

“The panel recommends to plan a more systematic formal dialogue between ANVUR and specific stakeholders (students, professional organisations, social partners) to collect feedback to be effectively beneficial for its governance and work.”

#### Evidence

##### External quality assurance activities

ANVUR was explicitly established to evaluate higher education institutions’ education, research, and related activities. As described in the law, its duties include implementing several different EQA activities that inform MUR’s initial and periodic accreditation of different levels of educational provision and different types of higher education institutions. The number of procedures completed across the activities fully in the scope of the ESG between 2019 and 2023 totals more than 7,000. This ENQA review of ANVUR has confirmed that each of the nine activities fully in scope broadly matches the description of EQA activities in Part 2 of the ESG, notwithstanding the need to address some remaining gaps to maximise their alignment and effectiveness.

ANVUR additionally undertakes other important activities in Italian higher education, such as research assessment, that contribute to the strength and capacity building of the system. In meetings with HEIs, MUR and sector representative bodies, the review panel heard about the increasing coherence of ANVUR’s approach across these activities to benefit those institutions and their stakeholders.

##### Strategic and operational planning

A Triennial Activity Plan is produced every year for the three years ahead, and the plan intends to set out the strategic direction and top-level work plan for the agency in a consultative, transparent, and systematic way. The self-assessment report states that the Triennial Activity Plan captures the strategic directions the Governing Board sets and that the plan is shared with MUR for feedback and approval. The review panel heard through the site visit and saw evidence of meetings whereby ANVUR’s Advisory Board plays a vital role in providing feedback on drafts of the plan each year. Ahead of the site visit, upon request, ANVUR confirmed in writing that the Triennial Activity Plan is the agency’s strategic plan and that no other document fulfils this function.



The review panel reviewed the Triennial Activity Plans for the three most recent years, the Performance Plans translating these into performance indicators, an example Performance Report (2022) detailing outcomes against those performance indicators, an example report by ANVUR's Independent Performance Evaluation Body (OIV) validating the contents of the Performance Report, and monitoring progress towards them, and papers and presentations documenting the iterative and consultative process followed to produce the 2023-25 Triennial Activity Plan. During the site visit, the review panel discussed ANVUR's strategic goals, current priorities, and internal objective-setting processes (at team and individual levels) with a range of governing board members, senior managers, and agency staff. The review panel also discussed with various stakeholders (HEIs, MUR, representative bodies) their aspirations for the role, priorities, and approach of ANVUR in Italian higher education in the coming years.

Most significantly, at a strategic level, the review panel found an agency that has transformed itself since the last ENQA review five years ago. The Governing Board and senior managers discussed the deliberate efforts to take a more participative approach to fulfilling ANVUR's remit that better engages stakeholders, and those stakeholders confirmed how successful this has been. The review panel heard about the firm resolve of ANVUR to become more internationalised so that Italian higher education institutions were better supported to participate in the European Higher Education Area and that Italian students and graduates could enjoy greater mobility globally. The review panel heard about ANVUR's collaboration with the AFAM sector over many years to transform their Evaluation Boards, pilot a new process of periodic assessment, and develop a regulatory framework with MUR. Leaders also discussed the agency's substantial, long-term, and strategic ambitions for itself and Italian higher education in the years to come – not least a simplified legislative and regulatory framework, a more formalised model of internal quality assurance as the agency grows and undertaking external quality assurance outside of Italy to further build the cross-fertilisation of good practice for the benefit of Italian higher education. However, the review panel did not find a concise written statement of these longer-term priorities or a vision statement for ANVUR. This may explain the different answers heard from leaders about the agency's long-term strategic plans.

Operationally, the review panel found a strong connection between the contents of the Triennial Activity Plan, the internal translation of this into priorities for teams and individuals, and the actual priorities that staff were actively working towards. This translation was evident through the published Performance Plans and plans developed for each department of the agency, as well as in discussions with agency staff about their own performance goals during the site visit. This lean agency has been under-resourced for some time, and the mature, embedded approach to planning helps focus its resources and energy on the most critical matters.

#### Stakeholder involvement

The change in leadership of ANVUR shortly after the last ENQA review brought a shift in approach and culture that prioritises a participative approach to developing EQA methodologies and, to an extent, the agency's governance.

The review panel observed many examples of this in the self-assessment report and supporting evidence, including the evolution of the AVA 3 cycle (periodic review for universities), the development of a new methodology for initial accreditation of PhD programmes, and the piloting of a new periodic assessment methodology for public AFAM institutions (and then the whole AFAM sector). The latter also demonstrated ANVUR's broader conceptualisation of its stakeholders, with an international working group composed to steer the agency's work on quality assurance in the AFAM sector. The review panel heard repeatedly and enthusiastically from ANVUR's stakeholders (universities, schools of advanced studies, AFAM institutions, students, experts, networks of Evaluation

Boards, MUR, and national representative bodies of students, academics, industry and rectors) that they, too, had observed and welcomed this change of approach by ANVUR in the last five years.

The review panel heard from the Advisory Board that there is a cyclical and predictable schedule of business that they now expect to engage with the agency about, including the annual production and review of the Triennial Activity Plan. There is a codified approach to the Advisory Board now performing some important governance tasks, such as appointing the Guarantee Commission to consider complaints and appeals (see ESG 2.7). This is an observable difference and improvement to the situation described during the last ENQA review and which addresses the recommendation of the last review. However, the agency recognises that there is an absence of representation from AFAM institutions because the membership of the Advisory Board was prescribed by a Presidential Decree in 2010 and has yet to be changed.

The Governing Board of ANVUR comprises a maximum of seven members (currently five) appointed by the President of the Italian Republic, who take up these positions full-time and are remunerated accordingly. These are, in effect, public officers, and the members perform executive functions directing the work and representing the agency. The current members are all professors in Italian universities (albeit they take unpaid leave for the duration of their appointment to ANVUR), and the review panel heard calls from AFAM sector leaders asking for future compositions to reflect better the diversity of higher education institutions that ANVUR serves. There is no regulatory barrier to appointed members of the Governing Board with experience in the AFAM sector, but previous public calls and selection processes have not resulted in such an appointment. The current Governing Board recognised this gap. While their appointment is outside their control, they saw an opportunity to address this imbalance in the imminent public call for new members.

While specific independent bodies are charged with holding ANVUR accountable for specific public duties (such as using public funds efficiently and operating ethically), there is no externality or 'non-executive' element in the top-level governance of ANVUR. The Advisory Board reports to and informs the decisions of the Governing Board, but as its name suggests, it plays an advisory role rather than participating in decision-making. The review panel heard from the Board itself and staff and could observe that the substantial experience of members of the Governing Board significantly benefited ANVUR. However, it is impossible to regard the members as external stakeholders once they take up their roles given their executive responsibilities. As such, there was no evidence of external stakeholders directly taking part in decision-making about the goals and objectives of ANVUR or the implementation and outcomes of EQA activities.

## **Analysis**

In ANVUR's 14-year history, it has completed thousands of procedures across its EQA activities. There have previously been deficiencies in the alignment of those procedures to various standards in the ESG. There continue to be some areas needing improvement, as outlined in this report. Still, the review panel have consistently found a demonstrable commitment from ANVUR and its stakeholders to maximise the alignment in a manner sensitive to the context and history of Italian higher education. The progress made by ANVUR since the last ENQA review has resulted in a greater alignment with Part 2 of the ESG overall. The review panel take particular assurance from ANVUR's most recent work to consolidate its learning and elevate its methodologies to a much higher level of quality (namely AVA 3, the pilot periodic assessment process for AFAM institutions, and the initial accreditation of Schools of Advanced Studies).

Aligning more effectively with the ESG forms an integral part of ANVUR's strategic focus on internationalisation, demonstrating that ANVUR has been deliberate and strategic in planning its evolution over recent years. Numerous examples throughout this report show that ANVUR is self-

aware of its current state and ambitious for its future, and it can make these ambitions a reality where it has the legislative and regulatory freedom to do so.

ANVUR's approach to planning is centred on the Triennial Activity Plan, which must be produced each year and approved by MUR according to the law. ANVUR is excellent at fulfilling this requirement and systematically using the planning tool and related performance reporting tools to organise its internal operations. However, the Triennial Activity Plan itself is restricted in its scope and does not (or ANVUR has not used it to) articulate the longer-term vision and objectives of the agency for the five to ten years ahead. There is a common understanding of that vision and those objectives among the agency's leadership (the Governing Board, Director, and senior managers) as they repeatedly verbalised these in a broadly coherent and consistent way. However, the nuanced differences in each leader's views and the levels of importance attached to each priority suggest these have not been codified and captured as a shared vision statement and set of objectives. If they have, they were not supplied in response to various requests for the agency's strategic plan. The review panel conclude that the approach to strategic planning is present and effective, but it could be more effective by ensuring that all leaders and staff work from the same understanding of the agency's long-term vision and goals. This will ensure the vision translates consistently in short- and medium-term planning (the Triennial Activity Plan), allowing for the explicit development of these ambitious goals in collaboration with the agency's stakeholders and fostering continuity in strategy that persists through changes to the Governing Board.

Beyond this longer-term planning, a wide range of effective stakeholder engagement informs the agency's governance and work, demonstrating significant progress since the last ENQA review. The many external stakeholders the review panel met welcomed and appreciated the demonstrable improvement in relations sought and achieved by the current leadership of the ANVUR. This is impressive, given the relatively short time frame since the last ENQA review.

External stakeholders are not directly involved in decision-making about ANVUR's goals or EQA activities owing to the distinct organisational form of ANVUR and the executive functions of the Governing Board. In practice, the collaborative approach of ANVUR's leadership ensures that decision-making is effectively informed by its stakeholders, and the review panel conclude that constitutes a form of being involved in governance, as required by the standard. However, there are risks that future compositions of the agency's leadership could be less collaborative, and that board-level decision-making without a non-executive element could be less effective. As such, there may be benefits to considering alternative structures of governance that more directly involve stakeholders, including students, in decision-making.

Whether or not the governance structures change, there are current obvious and concerning omissions. At the very minimum, ANVUR must act with the Ministry to include formally and fully those from the AFAM sector among its Governing Board and Advisory Board to complement the comprehensive representation of the universities sector. As discussed elsewhere in the report, too much detail about ANVUR's internal organisation is stipulated in law and regulation, and this is an excellent example of an opportunity to move such detail (e.g. the composition of the Advisory Board) to ANVUR's internal governing documents. No such change to regulation is needed to diversify appointments to the Governing Board.

### **Panel commendations**

- C01 The agency's strategic transformation, ethos, and collaborative approach in recent years, as recognised and celebrated by its stakeholders in the higher education system.
- C02 The rapid progress towards effectively engaging stakeholders, especially the Advisory Board, in the agency's work to achieve a more participative ethos.

### **Panel recommendations**

- R01 Work with the Ministry of University and Research to ensure that the Governing Board and Advisory Board include the expertise and experiences of AFAM institutions.
- R02 Build on triennial plans for delivering ANVUR's activities by incorporating the longer-term, more strategic ambitions shared by the agency's leadership so that stakeholders can inform these and more effectively steer the organisation's development.

### **Panel suggestion for further improvement**

- S01 Explore alternative models of governance that separate the organisation's strategic governance, decision-making about formal outcomes from EQA processes, and the work of the Governing Board as ANVUR's Executive so that stakeholders, including students, can more directly take part in decision-making about the agency's long-term future and EQA processes.

### **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**

ANVUR is an independent public body established in Italian law with a range of statutory duties relating to evaluating the Italian higher education and research system. A Presidential Decree in 2010 (no.76/2010) first established the agency and remains the primary instrument setting out its basis, bodies (President, Governing Board, Board of Auditors, Director, Advisory Board), and internal structures. Other decrees have since been added to and revised ANVUR's duties concerning specific activities.

Italian law mandates that the ministry responsible for accreditation of higher education institutions – currently MUR – receive and take seriously the recommendations of ANVUR on whether to grant accreditation. There are no other bodies in Italy with this recognised competence.

### **Analysis**

Italian law clearly and comprehensively recognises ANVUR's competencies, responsibilities, and powers, which are recognised and welcomed by the relevant Ministry, the agency, and its stakeholders.

### **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.

### 2019 review recommendation

“The panel recommends ANVUR to strive for more autonomy in setting the timetable and therefore define the procedures more freely (particularly in AFAM accreditations) aiming at improving the quality and meaningfulness of the external quality activities.”

### Evidence

#### Organisational independence

ANVUR is a public administration body established in law – specifically Decree Law no.262/2006 and Presidential Decree 76/2010 – and is sponsored by MUR. The original 2006 law makes provisions for a body that will function “according to principles of impartiality, professionalism, transparency and publicity of acts, and organizational, administrative and accounting autonomy, also in derogation of the provisions on general accounting of the state”.

As such, ANVUR operates with public sector frameworks to ensure it operates effectively and transparently, uses public funds efficiently, and fulfils the statutory duties it was established to undertake. The review panel found a consistent view in the law, regulation and ANVUR’s internal documentation that the Governing Board is the controlling body with accountability for ANVUR’s functions, and this was confirmed through discussions with ANVUR’s leadership, senior officials of MUR, and national representative bodies in the Italian higher education sector.

Some of the internal structures of ANVUR, including the top-level departmental structures and the composition of the Advisory Board, are detailed in Presidential and Ministerial Decrees, including the original Presidential Decree that established ANVUR 14 years ago (no.76/2010). Changing these requires governmental and legislative engagement, and while this is possible, it has yet to be achieved for some of the changes under active consideration. For example, the review panel heard from the agency’s leadership about a desire to include AFAM sector representation on the Advisory Board and to evolve the internal departmental structures as the scale and range of its operation grows. Still, there was no evidence of these changes meaningfully progressing.

#### Operational independence

ANVUR operates several different EQA activities across the University and AFAM sectors, which have historically been regulated in different ways and are at different stages of maturity concerning quality assurance. Through analysis of the evaluation criteria and methodologies for each EQA activity, including additional requests for evidence to ensure full sight of the suite of documentation for each activity, the review panel found significant diversity of approach for each activity.

At one end of the spectrum, some activities have not been updated for several years (such as the initial accreditation of programmes), and the agency’s own documentation is limited or does not exist (in the case of accrediting new PhD Programmes before the 2024 changes). Instead, the agency relies heavily on Ministerial Decrees to stipulate the evaluation criteria and, to varying extents, the methodology to be used. In contrast, the pilot procedure for the periodic assessment of public AFAM institutions is not yet mandated in law, so it has been designed and documented entirely by ANVUR

(in collaboration with stakeholders through an international working group), but it will not have a legal basis until a new regulatory framework for AFAM institutions is implemented by MUR.

ANVUR's leadership and staff, institutions, MUR, and representative bodies discussed the critical role of regulations (presidential decrees, ministerial decrees) in defining the EQA activities operated by ANVUR. ANVUR leaders and staff talked during the site visit about several examples of issues or gaps in their alignment with the ESG that they attributed to gaps in regulation or delays in changes to existing regulations. The following primary examples are discussed elsewhere in this report where sufficient alignment with the ESG has not yet been achieved, at least in part because of delays in changing regulations:

#### *Initial accreditation of new PhD programmes*

- The 2019 ENQA review of ANVUR made a clear recommendation that consideration of the internal quality assurance processes described in Part of the ESG be extended to all the agency EQA activities. EQAR specifically noted gaps in AFAM and PhD accreditation procedures.
- A new regulation published at the end of 2021 will govern the accreditation of PhD programmes going forward and will achieve greater alignment with Parts 1 and 2 of the ESG, but this will not take effect until the 2024/25 cycle of accreditations. As such, there is no evidence of the implementation of these new arrangements available to the review panel at the time of this ENQA review. The evidence that is available is for five further years of a process that does not align with the ESG.
- In meeting with ANVUR staff responsible for the quality assurance of PhD programmes, they confirmed to the review panel that delays in updating their EQA processes were because they had to wait for MUR to negotiate and issue a new decree, and that ANVUR could not change the process alone as it leads to an accreditation decision by MUR.

#### *Periodic assessment of AFAM institutions*

- The 2019 ENQA review of ANVUR made three different recommendations pertaining the quality assurance of AFAM institutions:
  - That ANVUR strives for greater autonomy in setting timetables and defining procedures freely (particularly AFAM accreditations).
  - That consideration of the internal quality assurance processes described in Part I of the ESG be extended to all the agency EQA activities. EQAR specifically noted gaps in AFAM and PhD accreditation procedures.
  - That ANVUR increases the usefulness of the AFAM accreditation system.
- ANVUR has made significant progress in working collaboratively with stakeholders in the AFAM sector and beyond to develop quality assurance activities, but this is not yet holistic and has notable gaps because the regulatory framework is missing. In our meetings with ANVUR leaders, MUR and sector bodies, the review panel heard that ANVUR had contributed to the development and drafting of this regulation but there was no certainty about the timescales for it emerging into the public domain and being enacted. In our discussions with MUR, they confirmed to the review panel that the framework of quality assurance and compliance for AFAM institutions is lagging behind that of universities. In a meeting with ANVUR's leaders, they confirmed that one of their aspirations by the time of the next ENQA review of ANVUR (by 2029) was to have a fully developed and approved framework for quality assurance in the AFAM sector.
- ANVUR's most recent work has centred around a refreshed approach to periodic assessment that can encompass public and private providers. This approach to periodic assessment is currently being piloted with a small number of volunteer public institutions

ahead of potentially being adopted fully for all public and private institutions. Following initial legislation being approved 25 years ago in 1999 (no. 508/1999), the enabling regulations needed to complement this and bring public institutions within the scope of periodic assessment are still to be finalised and introduced by MUR. In the meantime, ANVUR already has a remit to undertake periodic assessments of private AFAM institutions but continues to use its older methodology for these reviews when it has a more fit-for-purpose approach ready to deploy.

In summary, the review panel found that much of the specification of the EQA activities operated by ANVUR occurs within the regulation managed and published by the Ministry, Presidency, or Parliament.

The SWOT analysis undertaken by ANVUR and included in the self-assessment report (page 82) notes this as a threat:

**“3. Legal barriers (including overregulation) that hinder the adaptation of the QA framework to evolving needs and requirements, with particular reference to international higher education and the AFAM sector”**

Some regulations have been revised in recent years (for example, Ministerial Note 1071/2021) to devolve greater autonomy to ANVUR in some areas, such as the scheduling of cyclical accreditation activities. ANVUR has also benefited from structured dialogue with MUR since 2019, further strengthening their regular and comprehensive collaboration, following a suggestion from the previous review. There is a trend towards ANVUR exercising more control and independence in the operation of its EQA procedures when regulations are updated and modernised.

*Changing regulations and the timeliness of those changes*

The review panel discussed at length with ANVUR’s leaders and staff the extent to which they can influence the content of those regulations and, therefore, the definition of the EQA activities they operate – namely, the evaluation criteria and methodologies. There was some variation depending on the activity, but ANVUR largely did feel able to propose or influence the content of regulations in this way when MUR was drafting and seeking approval for them.

However, those discussions also showed that the Ministry itself only has a limited capacity to effect regulatory and legal change. ANVUR’s requirements to amend existing regulations or introduce new regulations are one of several competing demands on the Ministry’s limited capacity, which further limits the opportunity to make such changes in a timely way.

To illustrate the implications of this in practice: ANVUR has worked to change the methodology for the initial accreditation of PhD programmes to better align with the ESG, as recommended five years ago during the last ENQA review in 2018/19. The revised methodology appears to achieve this on the surface. Still, this ENQA review in 2023/24 cannot fully validate that alignment because no new procedures have yet been completed using the revised methodology.

*Engaging external experts*

ANVUR has engaged external peer experts in most of its external quality assurance activities, including senior leaders, disciplinary academic experts, students, and those with financial management and sustainability expertise. Following recent changes to the initial accreditation of PhD programmes, all activities will involve such experts moving forward. The review panel examined calls for new experts and the public registers of experts and discussed the recruitment and selection processes with ANVUR staff and several experts during the site visit. The review panel consistently found that ANVUR has control and independence in making decisions about the recruitment of experts to the register and

the allocation of experts to particular commissions, notwithstanding the arrangements in place to manage potential conflicts of interest.

### Independence of formal outcomes

The review panel examined the documentation for each EQA activity, as described above, and found a consistent position across all activities on who is involved in deciding formal outcomes. Expert panels (where they are in use) determine institutions' compliance or effectiveness against each evaluation criterion and then reach a rounded view on whether accreditation should be granted or which graded judgements should be confirmed. The expert panel's report is then considered in full by the Governing Board, who make ANVUR's final and formal decision on whether to recommend to MUR that accreditation be granted/renewed or rejected/ended.

The review panel has consistently heard from leaders, staff, external experts, and MUR that ANVUR has full independence in reaching decisions on the outcomes of its EQA procedures. While these are technically recommendations to inform the Ministry's decision on accreditation, the law specifies that they must usually be adopted as the ultimate decision. Where the Ministry raises questions, this can result in a repeat of the procedure and potentially a different subsequent decision, but not a change to the original decision.

### **Analysis**

ANVUR benefits from its founding as a public body with a formal status recognised in law. The powers and accountability of ANVUR's Governing Board to determine and control its organisation, within the boundaries determined by the law, and unambiguous and respected by all relevant parties. Overall, this provides a framework for ANVUR to operate with organisational independence that engenders authority and trust.

However, the same laws and regulations that provide a robust basis for ANVUR's existence have not changed sufficiently since its establishment 14 years ago. They are now too prescriptive about specific internal governance and organisation arrangements, including the Advisory Board's composition and departmental staffing structures. In practice, this has not materially impacted ANVUR's ability to function effectively so far. Still, there is an opportunity to simplify and lighten the detail set out in regulation, recognising that ANVUR is a mature and evolving organisation. Therefore, the review panel concludes that ANVUR does have organisational independence but there is room for improvement.

Similarly, a lot of detail is specified in regulations about the evaluation standards and methodologies for ANVUR's external quality assurance activities. This goes beyond setting the aims and outcomes that processes need to meet as might be reasonably expected in government regulation. In contrast to the limited impact on organisational independence where there is less detail and a less frequent need to change the regulation, the volume and complexity of regulation are having a material and detrimental impact on ANVUR's operational independence – namely its ability to define and change its EQA standards and processes in a timely way.

The presence of such detail in regulations could be argued to bring legitimacy and strength to ANVUR's operations, and it is evident that ANVUR proposes the regulation's content. However, ANVUR cannot always make timely changes, which undermines any ability to influence the content of draft regulations when they remain unapproved.

The review panel heard several examples of ANVUR not yet making enough progress because of delays in changing the regulatory framework, and several of the recommendations in this review stem from this same root cause. While ANVUR proposes the content of the regulations and is in some cases legally responsible for doing so, it cannot effect changes in a timely way, and this erodes the initial perception that ANVUR can effect change. This is most evident with the external quality



assurance of AFAM institutions and has caused delays in changing the initial accreditation of PhD programmes. Therefore, the review panel must conclude that ANVUR’s operational independence is limited. This mirrors the sentiment of the recommendation from the last ENQA review – that ANVUR should “define the procedures more freely” – and this must be treated seriously in the context of another five years passing by without enough progress being made.

The unifying feature across ANVUR’s EQA activities is that the Governing Board concludes each procedure by recommending to MUR whether to grant/renew accreditation or not. This responsibility and the right of ANVUR to make the decision independently is enshrined in law and widely understood in Italian higher education. The review panel can conclude that ANVUR’s formal outcomes are reached independently.

Overall, the picture of the agency’s independence is mixed. While the agency has organisational independence and can reach formal decisions independently, its operational independence is limited. While they have been creative and flexible in working around regulatory constraints in many cases, there are too many significant examples of EQA processes not yet changing or not changing soon enough to conclude that ANVUR is compliant with this standard.

### **Panel recommendation**

R03 Work with the Ministry of University and Research to simplify legislation and regulation so that they focus only on the main goals and outcomes that EQA activity needs to achieve. Transfer the evaluation criteria and processes to ANVUR-issued guidelines that can be changed with more agility.

### **Panel suggestion for further improvement**

S02 Consider asking the Ministry to simplify and reduce the regulation on ANVUR’s internal structures, namely the organisational units and the composition of the Advisory Board, so that these can more flexibly adapt to support ANVUR’s strategy.

### **Panel conclusion: Partially 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 recommendation**

“The panel recommends the systematic publication of any outcomes resulting from thematic working groups’ activities conducted by ANVUR.”

### **Evidence**

ANVUR’s extensive operations and broad remit in the Italian higher education system enable it to access and capture a wider range of data and insight. One of the agency’s longstanding legal duties is to produce an analysis of its own data and national datasets in the form of a *Biennial Report on the State of the Italian Higher Education and Research System*. MUR, representative bodies, and institutions confirmed that this is a widely recognised and utilised report, including by the Government, to inform its development of higher education and research policy. The review panel asked ANVUR to highlight

sections of the most recent report (2023) that specifically described and analysed the findings from their EQA activities, and received translations of these extracts from ANVUR. There were comprehensive quantitative summaries of the formal outcomes from different processes (e.g. the numbers of positive and negative accreditation decisions), but the analysis of qualitative findings was minimal and not a major focus of the report.

The self-assessment report details several ad hoc research and development projects exploring topical issues, including disabilities and specific learning disorders in Italian universities (2022), the recognition and enhancement of the teaching competencies of university professors (2023), and distance learning services provided by universities in response to the COVID-19 pandemic (2020). ANVUR convened working groups of stakeholders to steer and contribute to the first two of these analyses and undertook primary research in all three analyses to inform the reports published. ANVUR leaders reflected that the selection of these topics was partly because they had observed their importance and need for further exploration. ANVUR now routinely publishes information about and the outcomes from its working groups, which can be [accessed via a single landing page on its website](#), which addresses the recommendation of the last review.

The review panel explored how ANVUR analyses and uses the qualitative findings of EQA activities (namely the evaluative analysis by external experts captured in their reports) in discussions with ANVUR's leaders during the site visit and requested in writing during the site visit that ANVUR provide any remaining evidence of such analysis, whether published or not. The review panel were subsequently able to access three unpublished internal analyses that built on the quantitative analysis with a more nuanced analysis of trends, correlations to different evaluation criteria, and the profile of external experts involved in the periodic assessment of universities. This included end-of-cycle analysis as ANVUR concluded the AVA 2 cycle of periodic assessment of universities to AVA 3.

In discussing ANVUR's vast knowledge base and contribution to the evolution of quality assurance with higher education institutions and sector representative bodies, the review panel heard repeated and enthusiastic calls for ANVUR to use better and share the information it holds about good practice. ANVUR is viewed by its stakeholders as already making a significant contribution to the strategic development of Italian higher education, with the potential to make an even more significant impact by sharing such good practices.

## **Analysis**

ANVUR has an important and influential role in understanding and informing Italian higher education's evolution, including through its biennial analysis of data trends and its ad hoc enquiries into topical issues. ANVUR's leadership and staff have vast expertise in the quality and quality assurance of Italian HE, and they regularly share this through sector events, in working groups, and to inform the policy positions they propose to the government. Stakeholders across the Italian higher education system place considerable value on the insight and significant contributions of ANVUR. They would welcome this role evolving even further by sharing good practices between institutions.

There is room for improvement by more systematically drawing together the qualitative analysis from review reports for each cycle of EQA activity and feeding this into the range of publications already produced and into other publications that allow the sector to make full use of ANVUR's insights. The review panel recognise that ANVUR has been limited by its source material – expert panel reports – varying in depth and form. This will become more straightforward if ANVUR standardises the templates used for reports across its EQA activities (not just within each activity) and supports experts in improving the quality and consistency of report drafting. Good progress has already been made towards improving the quality of reports in the latest cycle of periodic assessment of universities (AVA3) and this practice is being piloted in the periodic assessment of public AFAM institutions, so there is a good foundation upon which to build.

Overall, ANVUR is a thoughtful and analytical agency acting at the system level to drive improvements in an evidence-based way. It is beyond doubt that ANVUR has had a considerable impact in this way in recent years. The review panel considers this to be within the spirit of this standard and achieving compliance overall, but the agency should act to further strengthen its compliance through a more systematic approach moving forward.

#### **Panel commendation**

C03 The agency makes a major contribution to the understanding and development of the Italian higher education sector through its original research and analysis of national datasets.

#### **Panel recommendation**

R04 More systematically and critically use the qualitative findings and analysis from EQA procedures to inform the already impressive range of quantitative analysis, publications, and influence on the Italian higher education system so that they can inform improvements.

#### **Panel suggestion for further improvement**

S03 Learn more about the demand from institutions for ANVUR to share good practices and consider how this could be done effectively and sustainably.

S04 Make full use of the analysis of annual reports by University/AFAM Evaluation Boards as part of the evidence base for thematic analyses.

#### **Panel conclusion: 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 panel recommends to establish priorities with regards to the development of meaningful processes and procedures, compatible with the available resources.”

“The panel also recommends to open a reflection on the revision of the organizational structure of the agency, including an evaluation about to what extent – in a medium to long term perspective – it would still be considered the most optimal use of resources to reserve a relatively large percentage of the budget to the full-time engagement of the governing board members.”

“The panel recommends to enhance IT resources for the use of software applications and to provide support to all of the agency's activities.”

#### **Evidence**

ANVUR was established through a period of considerable restraint and scarcity of public resources, but in more recent years, it has started to evolve and grow considerably to reflect the increasing range and scale of its activities.

The agency operates with a recurrent grant budget that is stable and predictable, as outlined earlier in this report. This is supplemented with an additional budget for periodic (e.g. research assessment)

and some ad hoc activities assigned by MUR. ANVUR's Triennial Activity Plans provide a clear forward view of the activity that ANVUR will deliver and enables decisions to be made about priorities within resource constraints, which addresses the recommendation of the last review with regards to the development of meaningful processes and procedures, compatible with the available resources.

Some ad hoc activities do not come with an additional budget and inevitably impact ANVUR's planned business-as-usual activity. For example, the review panel heard about a recent exercise to review and approve a large volume of applications to launch teacher training programmes as part of the National Recovery and Resilience Plan at short notice.

ANVUR has a highly qualified team (largely to PhD level) of 38 staff. In discussions with institutions, sector representative bodies, and volunteer members of governance bodies (e.g., the Guarantee Committee), they repeatedly noted how respected ANVUR staff are for their expertise and collegiality. ANVUR's staff and leaders discussed several examples of them finding and undertaking professional development opportunities with the support of ANVUR, but there was limited evidence that all staff consistently benefitted from systematic discussions about and support for their professional development as annual appraisal discussions appeared to focus more on objective-setting and performance evaluation.

ANVUR's staff is growing considerably and will reach a headcount of 60 in the coming year or two. They would like to move faster in recruiting additional staff but must contend with a challenging market for recruiting high-quality and qualified staff. ANVUR staff are civil servants and paid within a public pay framework, which the agency's leadership stated can limit how competitive salaries are.

While there is a growing staff base, ANVUR cannot make full use of the resources available to it. Some ANVUR staff have been able to pursue professional development opportunities in the form of secondments to government ministries. Still, in a small number of these cases, ANVUR continues to pay for part of their salary. This restricts ANVUR's ability to 'backfill' the staff members and make full use of the resources allocated.

The agency has reflected on whether maintaining the current Governing Board model and the associated expense is still the optimal use of resources, as required by the recommendation of the last review. The agency remains committed to the current model, and so does the government, having extended the terms of the current members from four to six years. No cause or evidence has been found to repeat this recommendation in relation to the cost of such a model, but the review panel have suggested that alternative models of governance be explored to facilitate the engagement of external stakeholders directly in decision-making about ANVUR's strategic direction (see ESG 3.1, S01).

ANVUR increasingly uses technology to help manage its operations and deliver efficiencies. This has been helped by ANVUR joining the CINECA consortium that supports the adoption of technology across Italian higher education, which goes some way to address the recommendation of the last review to enhance the IT resource available. This has led to improved experience, security and reliability in some of ANVUR's operations. However, some activities depend on platforms shared with the Ministry of Universities and Research, particularly those relating to the initial accreditation of programmes and institutions and the submission of monitoring data. The review panel repeatedly heard that the experience of staff in ANVUR and institutions is poor when using these systems, and they add to the burden and negative perceptions of otherwise productive quality assurance activities.

## **Analysis**

ANVUR's resourcing is stable and predictable, enabling forward planning to take place with a high degree of confidence. While there has been and continues to be a deficit in the levels of staffing needed

to fulfil ANVUR's wide range of responsibilities, MUR has agreed to a substantial increase in staff, which will bring significant benefits once recruitment is completed over the next two years.

ANVUR's staff are widely respected and valued by ANVUR's stakeholders, and they are undoubtedly its greatest asset. It is positive that the expertise and talents of ANVUR staff will be called upon to support occasional additional government tasks within ANVUR or through secondments. This should be anticipated and factored into ANVUR's resource allocation and planning.

As discussed elsewhere, there is also an opportunity to ensure that ANVUR's most strategic goals are more effectively translated into operation plans, including workforce planning. This will help shape the professional development provision for all staff more strategically than currently. For example, English language training and digital skills for hybrid working are important but felt very limited in enabling ANVUR's strategic objectives.

Staff are well-led and well-supported in joining ANVUR and developing themselves professionally. However, there is an opportunity to ensure all staff engage more systematically in discussions about their professional development and growth and have the means to access these opportunities so that it is not as reliant on individuals' proactivity.

ANVUR's progress in adopting new technologies to support the internal administration of EQA activities is to be welcomed, but this progress is overshadowed by the ineffective platforms and data collection processes shared with MUR, which cause considerable frustration. While partly outside of ANVUR's control, there is a pressing need to collaborate with MUR on improvements to this infrastructure.

Overall, the financial, human, and technical resources available to ANVUR have been used efficiently to deliver a demanding range of responsibilities. The level of resourcing is increasing to better reflect the agency's needs and will additionally allow new functional areas, such as internationalisation, to be permanently resourced and evolved. There are opportunities to utilise the resources available even more effectively and strategically and to find new efficiencies through improvements in technology so that they continue to be sufficient for ANVUR into the future.

### **Panel commendation**

C04 Dedicated, highly qualified and well-respected staff represent the agency well and build trust with their stakeholders.

### **Panel recommendations**

R05 Work with the relevant ministries to build greater resilience and flexibility into ANVUR's financial planning to lessen the impact of occasional tasks and staff secondments on delivering core business.

R06 Improve the digital platforms and their interoperability and streamline the data collection processes jointly used by ANVUR and the Ministry for Universities and Research.

### **Panel suggestion for further improvement**

S05 Further enhance the support for staff undertaking professional development opportunities, ensuring that all staff are regularly engaged in discussions about and document their development and that ANVUR's longer-term strategic goals inform these discussions.

### **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

“The panel recommends to introduce a system aiming at formalizing processes assuring that external feedback is collected systematically and leads to a continuous improvement within the agency.”

### Evidence

ANVUR is a complex organisation with a wide range of responsibilities and stakeholders. A range of evolving processes and practices used within ANVUR’s activities help define expected service standards and ensure the quality of service delivery is in line with these standards, as described below. The SWOT analysis in ANVUR’s self-assessment report recognises “substantially robust ANVUR’s IQA but not completely formalised” as a weakness. In discussions with ANVUR’s leaders, they identified the development of a holistic Internal Quality Assurance policy or handbook as an opportunity to enhance their approach moving forward.

The SAR sets out the new practices that have been introduced to ensure a participative approach to designing and enhancing different EQA activities, and in practice, these are being adopted for different activities. For example, the redevelopment of the AVA model of periodic assessment of universities (AVA 3) was undertaken iteratively with stakeholder engagement at each stage, including through a specially established working group of stakeholders.

During discussions with ANVUR staff and stakeholders engaged with (re)designing methodologies, the review panel heard that cross-team working and sharing of practice support this harmonisation of the stakeholder engagement practices and the design of EQA activities in some cases. The new procedures for periodic assessment of AFAM institutions draw heavily on the learning from three rounds of evolving the AVA procedures for universities, for example.

The SAR sets out improvements in collecting and using feedback from experts and institutions after an EQA procedure is complete, which addresses the recommendation of the last ENQA review. This was explored through requests for additional commentary and evidence in advance of the site visit, including examples of the questionnaires used and some of the feedback supplied. Some of this activity is still new and has yet to produce a critical mass of usable insight, but it will do so in time.

Additional activities support Internal Quality Assurance for the organisation overall, many of which are mandatory for public administration bodies and support important national agendas for public body performance, transparency, gender equality, anti-corruption, and ethical practice. For example, the SAR details that “ANVUR’s Code of Ethics sets the ethical framework within which the experts must operate. It outlines the principles that guide their conduct during the evaluation process, emphasising the importance of independence, impartiality, transparency, rigour, professionalism, and confidentiality. These principles aim to uphold the integrity and credibility of the evaluation outcomes”.

One such example is the top-level planning through Triennial Activity Plans and the associated performance monitoring, which brings a helpful focus to ensuring ANVUR’s resources are being targeted where they are needed most. This regular planning discussion that encompasses the whole organisation also allows for shared ownership and visibility of priorities in the coming one to three years.

## Analysis

There is a range of activities that positively impact and continuously improve the quality of ANVUR's operations, and they are increasingly becoming joined up across teams and EQA activities. This is beginning to move ANVUR forward from its history of more disjointed approaches, which meant many different activities and approaches to internal quality assurance exist. The progress to date, and now two ENQA reviews, have helped ANVUR's leadership see the value added by a more strategic approach to internal quality assurance, and the review panel agrees that there is a need to build on this with a joined-up policy or handbook. This will benefit existing staff considerably but becomes even more important as ANVUR grows the size of its team by more than 50% in the coming years and seeks to onboard many new staff without compromising service quality.

The progress already made by ANVUR in systematising the collection and use of feedback from institutions and experts following the completion of EQA procedures is encouraging. There is still an opportunity to guide different teams through analysing and using this feedback in a joined-up way and to draw out common themes that transverse any one methodology. This could be especially relevant after ANVUR's work to harmonise procedures for recruiting to its Register of Experts and to support new experts undertaking EQA activities.

Overall, there are processes in place for defining, assuring and enhancing the quality and integrity of ANVUR's activities. While there is room to enhance and join up their approach further, the review panel conclude that the current suite of activities is mostly effective and achieves the desired outcomes of a system of internal quality assurance.

## Panel recommendation

R07 Be more joined-up, deliberate and consistent in ANVUR's overall approach to Internal Quality Assurance, and document this to maximise consistency and especially for the benefit of the many new staff joining.

## Panel suggestions for further improvement

S06 Formalise ANVUR's expectations for stakeholder engagement in the design and periodic review of EQA activities and in the use of feedback from experts and institutions upon completing a procedure.

S07 Consider how best to share feedback from experts and institutions between ANVUR's teams, identify similar themes in the feedback across EQA activities, and take a joined-up approach to addressing shared challenges and opportunities.

## 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

This is the second ENQA-coordinated review of the agency's compliance with the ESG, and ANVUR took the opportunity for an ENQA Progress Visit to support its ongoing work towards greater

compliance with the ESG. While there are still some areas to improve, demonstrable progress has been made towards many of the recommendations from the last review.

While not strictly related to the ESG, the agency is also pursuing accreditation by the World Federation for Medical Education (WFME) for Italian graduates in medicine and surgery to continue their training in the US.

### **Analysis**

There is clear evidence of compliance with this standard. There is also a broader demonstrable commitment to internationalisation and alignment with best practices internationally.

**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.

### **2019 review recommendation**

“The panel recommends to extend consideration of the internal quality assurance processes described in Part I of the ESG to all of ANVUR’s external QA activities falling within the scope of the ESG.”

### **Evidence**

ANVUR operates several EQA procedures that broadly cover the initial accreditation of programmes, institutions, and decentralised (branch) campuses, as well as the periodic review of institutions. It does this for universities, schools of advanced studies, and AFAM institutions, with some differences for public and private institutions in both sectors. In total, ten distinct activities and processes should collectively address the effectiveness of internal quality assurance processes as described in Part I of the ESG (treating the pilot periodic assessment of public AFAM institutions as separate from the established process for private AFAM institutions). The SAR and supporting evidence provide some analysis of how each activity aligns with the ESG, but the coverage and quality of analysis needed to be more complete and helpful in understanding the whole picture. Additional evidence and clarifications were requested and discussed for each of the processes at various points throughout the site visit with ANVUR leaders, staff and experts, and with institutions.

Specifically, the review panel sought to compile a comprehensive and clear repository of the various guidance documents (ministerial decrees, evaluation criteria, guides on methodologies) that experts, institutions, and the Governing Board use to understand, implement and reach decisions from the processes. The availability, completeness and clarity of this documentation varies between the different activities, as is discussed in more detail in relation to subsequent standards. However, a complete picture has been built and any omissions in the SAR and supporting evidence were due to a lack of alignment, rather than the absence of documentation in the evidence base.

The review panel have compiled the mapping grid below showing the alignment between each of ANVUR’s EQA activities fully in scope and Part I of the ESG. This uses ANVUR’s mapping in its SAR (pages 41-46) and triangulates it with guidelines and ministerial decrees for each procedure (where they exist), ANVUR’s written responses to clarification questions before the site visit, and discussions



with ANVUR leaders, staff and experts, and institutions, during the site visit. The evidence base was compiled and used in its final state after multiple requests by the review panel to ensure it had clarity.

During the site visit, the review panel discussed with ANVUR's leaders how much progress they had made towards aligning their procedures with the ESG. They recognised that the procedures were at different stages of maturity and were gradually becoming more aligned with the ESG as they reformed them, but that the evidence of such alignment working well in practice is still limited.

For example, the new evaluation criteria and methodology for the initial accreditation of PhD programmes explicitly draw on Part I of the ESG to ensure better alignment, representing an improvement from the previous methodology in theory. However, there are not yet any completed procedures using the revised evaluation criteria and process, which means there is no evidence of this activity addressing the effectiveness of internal quality assurance in practice.

The reformed approach to periodic assessment of AFAM institutions (piloted in three public institutions by the time of the site visit) will achieve much greater alignment in the future, but it is not currently the actual approach in use for private institutions and there is not yet any legal basis from MUR to implement the revised approach. There is, therefore, still limited evidence of the effectiveness of internal quality assurance in AFAM institutions being addressed in a robust, reliable manner.

EQA Activities in Scope**		Alignment by Standard										Overall, is there sufficient alignment to address the effectiveness of internal QA?	
		I.1	I.2	I.3	I.4	I.5	I.6	I.7	I.8	I.9	I.10		
		Policy for quality assurance	Design and approval of programmes	Student-centred learning, teaching and assessment	Student admission, progression, recognition & certification	Teaching staff	Learning resources and student support	Information management	Public information	On-going monitoring and periodic review of programmes	Cyclical external quality assurance		
U n i v e r s i t y s e c t o r	Initial accreditation of new Universities and their proposed study programmes	N/A*	Yes	Yes	Partial	Partial	Partial	Partial	N/A*	N/A*	N/A*	Partial	
	Initial accreditation of new Schools of Advanced Studies and their proposed PhD programmes	Yes	Yes	Partial	Partial	Partial	Yes	Yes	Yes	Yes	N/A*	Partial	
	Initial accreditation of new University study programmes (inc. decentralized branches)	Yes	Yes	Yes	Partial	Partial	Partial	N/A*	N/A*	Yes	N/A*	Partial	
	Initial accreditation of new PhD programmes	Yes	Yes	Partial	Yes	Partial	Yes	No	Partial	No	N/A	Partial	
	Periodic assessment of universities and their study programmes (including PhD programmes)	Yes	Yes	Yes	Yes	Yes	Partial	Partial	Partial	Partial	Yes	Partial	
A F A M s e c t o r	Initial accreditation of new private AFAM institutions and their proposed study programmes	Partial	Partial	Partial	Partial	Yes	Partial	No	No	Yes	N/A*	No	
	Initial accreditation of new AFAM study programmes	Partial	Yes	Partial	Yes	Yes	Partial	No	No	Yes	N/A*	No	
	Initial accreditation of decentralized branches of AFAM institutions and their proposed study programmes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A*	Partial	
	Periodic assessment of AFAM institutions and their study programmes	Private (established process)	Partial	Partial	Partial	Partial	Yes	Partial	No	No	Yes	Yes	No
		Public (pilot process)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

\* ANVUR has determined that some standards in ESG Part I do not apply to some of its EQA activities. Instead, it sees several related activities as holistically addressing the effectiveness of internal quality assurance in institutions.

The coordination of University and AFAM Evaluation Boards is only partially within the scope of the ESG for this review, not including standard 2.1 and Part I of the ESG. These activities are, therefore, excluded from this mapping and the panel's judgements on ANVUR's compliance with ESG 2.1.

## Analysis

ANVUR's various EQA activities vary in their design and how they are documented, with varying amounts of detail for each activity recorded in regulation as discussed elsewhere in this report. This made it difficult to comprehensively assess the alignment to Part I of the ESG for each activity or cognate activities in a group.

ANVUR has a strategic aim to gradually revise each activity to more explicitly use evaluation criteria that align directly with the relevant standards in ESG Part I. Some activities align well (e.g. periodic assessment of universities and their study programmes through AVA 3), some will align more effectively once recently approved changes are implemented soon (e.g. the initial accreditation of PhD procedures), and some are likely to align well if approval is granted by the Ministry (periodic assessment of AFAM institutions) but this cannot yet be confirmed without approval in place.

ANVUR has determined that some standards in ESG Part I do not apply to some of its EQA activities, but instead see several related activities as holistically addressing the effectiveness of internal quality assurance in institutions. For example, a university's approach to the ongoing monitoring and review of programmes (ESG I.9) is not assessed each time a new taught programme is proposed to ANVUR for initial accreditation, but rather this is considered holistically during periodic assessment of the university. The panel considered this a reasonable approach that demonstrates how the ESG need to be carefully applied in context. However, ANVUR takes a different approach with the initial accreditation of PhD programmes, where ESG I.9 is considered in scope. This contradiction in practice and others like it indicate that further joined-up consideration of how best to align with Part I of the ESG is needed.

Overall, there has been progress made in recent years and the review panel see that ANVUR is moving in the right direction. With governmental support to approve new regulations for the AFAM sector, there is potential for a strong evidence base to build in the coming years that demonstrates more robust compliance with this standard.

However, in the meantime, ANVUR is not yet far enough ahead in its work and cannot yet evidence a material change compared to the findings and recommendations of the last ENQA review in 2019. ANVUR has invested time and energy to make progress, but the culmination of several years in which the Covid-19 pandemic and political change have delayed progress (as discussed early in the report), and the circumstances whereby ANVUR is dependent on timely changes to regulation and ministerial decrees to change the design of its EQA activities.

## Panel recommendations

- R08 Complete work underway in response to the 2019 recommendation that ANVUR extends consideration of the internal quality assurance processes described in Part I of the ESG to all of the agency's external QA activities falling within the scope of the ESG. Pay particular attention to the Ministry's approval of a regulatory framework for quality assurance in AFAM institutions and ANVUR's publication of its evaluation methods.
- R09 Be more consistent and transparent across different sectors and levels of provision when holistically applying Part I of the ESG across initial accreditation and periodic assessment activities.

## Panel suggestion for further improvement

- S08 Apply the good practice of an international working group to develop new approaches to QA in the AFAM sector when reviewing other areas of activity.

## Panel conclusion: Partially 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 recommendations

“The panel recommends ANVUR to introduce and continue efforts aiming at a formal and concrete systematic involvement of student organizations – and the student body in general – in the design and enhancement of its activities.”

“The panel recommends ANVUR to further involve AFAM stakeholders in the design and continuous improvement of ANVUR’s external QA activities in the AFAM sector.”

### Evidence

The SAR details several examples of methodologies that have been newly designed or revised in recent years. The review panel explored documentation of the methodologies and the processes for developing these, and discussed the approaches taken with a number of those stakeholders met during the site visit. Three examples demonstrate the evolving approach being taken by ANVUR, which the agency’s leaders described as increasingly “participative”.

#### 1. Enhancing the periodic assessment of universities between cycles (AVA 2 to AVA 3)

ANVUR established and collaborated with a working group of stakeholder organisations – including CNSU, the Italian National Council of University Students – between 2021 and 2023 to reflect on previous practices, agree on high-level aims for the revised approach, and iteratively agree on how the revised approach would be implemented. Wider public consultation and a pilot with three institutions helped to refine the approach before it was formally approved and published. Institutions, representative organisations and ANVUR’s staff discussed the positive impact this approach has had on both the quality of the approach now being taken and the working relationship between ANVUR and institutions.

#### 2. Reforming the initial and periodic assessment of PhD programmes

Following the recommendation of the last ENQA review, ANVUR developed revised regulations and successfully proposed that MUR adopt these going forward. After that, ANVUR established and collaborated with a working group – including a student member – to develop the operational guidelines steering the implementation of the methodologies. ANVUR has embedded the periodic assessment of PhD programmes (in universities) into the broader periodic assessment of the universities (AVA 3), which university leaders describe as having a significant and positive impact on raising the status of quality assurance in doctoral education nationally.

#### 3. Piloting a new approach to the periodic assessment of AFAM institutions

Through 2020 and 2021, ANVUR formed an international working group to advise on the development of a comprehensive quality assurance framework for AFAM institutions, including members from EQAR-registered [EQ-Arts](#), fellow ENQA member [MusiQuE](#), and the [European Students’ Union](#). As well as proposing regulations to MUR for adoption, the major outcome from this work is the development and piloting of a new methodology for the periodic assessment of AFAM institutions. The approach has been piloted in public institutions voluntarily in 2023 pending a mandate in law to carry out periodic assessments in public institutions. ANVUR expects to roll

out the new approach to private AFAM institutions too, where they already undertake periodic assessments using an older methodology. Learning from the first pilot will inform a further round of pilot visits in 2024-25, and a wider consultation will be completed before a final version of the methodology is approved.

In reviewing the documentation available for each EQA activity, the review panel did not always find a clear, accessible statement of the aims of a process beyond achieving or maintaining accreditation by MUR. It was clear from discussions with ANVUR's leaders and staff that they aimed to support the enhancement of quality, build a culture of quality improvement, and internationalise the Italian higher education system, as well as confirm compliance with baseline requirements, but it was not always possible to determine this from reading the documentation alone.

## **Analysis**

There are benefits to having several distinct EQA activities because they can be designed with a specific focus and outcome in mind. In ANVUR's case, this means there is the opportunity to tailor processes to the type of institution (university, AFAM, SAS) as well as the nature of the QA process (initial accreditation vs. periodic assessment, programme vs. institution). Our discussions with leaders of higher education institutions confirmed that ANVUR does take care to understand and accommodate their distinctive characteristics, and this is to be celebrated. That has not stopped ANVUR from sharing some good practices across its methodologies though. For example, the new periodic assessment methodology for AFAM institutions borrows heavily from the AVA 3 approach to periodic assessment of universities. The review panel encourage ANVUR to go further in finding these commonalities, streamlining the complex range of activities it undertakes, and harmonising the evaluation criteria used too, where appropriate.

ANVUR has deliberately and purposefully changed its approach to designing its methodologies so that stakeholders are more firmly involved at all stages. The three examples above demonstrate how this new approach to stakeholder engagement has propelled ANVUR forward significantly, not only resulting in better methodologies but also building lasting engagement and respect from stakeholders.

It can still be difficult to access and understand the full design of a method because the information for some activities is dispersed across ministerial decrees, documents with evaluation criteria and points for attention, and documents setting out guidelines on the process. Because clearly stated aims and purposes could not be easily located for every activity among these documents, it could be difficult for ANVUR and its stakeholders to accurately evaluate how well those aims are achieved.

Overall, there is now a critical mass of practice and experience in designing better methodologies for external quality assurance in ANVUR. This is having a positive impact on the quality of ANVUR's operations and, even more so, on the lasting and meaningful relationships that ANVUR is building with its stakeholders domestically and internationally. This is wholly positive and the review panel encourage ANVUR to ensure these practices are codified as minimum expectations and rolled out as standard for other EQA activities as they are refreshed on a cyclical basis.

## **Panel commendations**

- C05 The collaborative approach to developing and piloting periodic assessment of public AFAM institutions.
- C06 The thoughtful, iterative and collaborative approach to evolving AVA in its third cycle.
- C07 The evolution of quality assurance procedures, both internal and external, related to PhD programmes that have started to embed a stronger quality culture across the sector.

### Panel recommendation

R10 More explicitly define and consistently publish the purpose and aims of each EQA activity, beyond securing accreditation from the Ministry.

### Panel suggestion for further improvement

S09 Roll out the approaches used in developing the methods for AVA 3 and the pilot of periodic accreditation in public AFAM institutions, which appear to be hugely positive and productive.

### 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

### 2019 review recommendation

“The panel recommends to increase the usefulness of the AFAM accreditation system implementing processes compatible with the AVA system and adapted to the AFAM institutional context.”

### Evidence

As explained above, the review panel took care to ensure access to the full range of documentation for each EQA activity, including specifically the evaluation criteria and guidance on the process and methodology. ANVUR’s website was also reviewed to understand how much was published and easily available. The review panel recognised the complexity of ANVUR’s portfolio of activities but found it difficult to be sure that the full suite of documentation was supplied and that this was all publicly available online. In practice, there are several different approaches to documenting procedures, from clear and integrated guidance for the piloting of periodic assessment in public AFAM institutions to no ANVUR-issued guidance at all for the initial accreditation of PhD programmes before 2024, instead relying only on MUR’s regulation setting out the criteria for accreditation. The evidence of processes being pre-defined and published was, therefore, limited for some activities.

Through a review of the documentation available and discussions with ANVUR staff and experts, and with institutions that have undergone evaluation by ANVUR, the review panel found that the processes are designed and implemented to usually include a self-assessment report (or equivalent), external assessment including a site visit, a report, and a follow-up.

EQA Activity	SAR	Site visit	Report	Follow-up
Initial accreditation of new universities: <a href="#">2020 and 2021</a> .	Yes	Some*	Yes	Yes**

<b>EQA Activity</b>	<b>SAR</b>	<b>Site visit</b>	<b>Report</b>	<b>Follow-up</b>
<a href="#">Initial and periodic accreditation of Schools of Advanced Study.</a>	Yes	Yes	Yes	Yes**
Initial accreditation of study programmes: <a href="#">2023-2024</a> ; <a href="#">2022-2023</a> .	Yes	Some*	Yes	Yes
Initial accreditation of PhD programmes: <a href="#">XXXIX cycle</a> ; <a href="#">XXXVIII cycle</a> .	Yes	Some*	Yes	Yes
Periodic assessment of universities and their study programmes: <a href="#">AVA 3</a> ; <a href="#">AVA 1 and AVA 2</a> .	Yes	Yes	Yes	Yes
<a href="#">Initial accreditation of new private AFAM institutions and their proposed study programmes.</a>	Yes	Some*	Yes	Yes
<a href="#">Initial accreditation of new AFAM study programmes.</a>	Yes	Some*	Yes	Yes
Periodic assessment of AFAM institution and their study programmes – <a href="#">established process for private institutions</a>	Yes	Yes	Yes	Yes
Periodic assessment of AFAM institution and their study programmes – <a href="#">pilot process for public institutions</a> .	Yes	Yes	Yes	Yes

There are some valid exceptions:

- \* Site visits are not mandatory for the initial accreditation of institutions (except schools of advanced studies), study programmes (except medical and healthcare programmes, and those offered at decentralised campuses) and PhD programmes but may be undertaken if deemed necessary following an initial desk-based assessment.
- \*\* Follow-up engagements with newly accredited universities and schools of advanced studies are undertaken as part of the periodic assessment process. Additionally, the Italian system of Evaluation Boards is utilised to good effect in monitoring the progress towards any recommendations or conditions arising from the initial accreditation. Annual reports by Evaluation Boards are submitted to ANVUR and provide a line of sight to the progress being made. Where that progress is insufficient, the guidelines, ANVUR's governing documents and discussions through the site visit confirmed that ANVUR can decline to consider new programmes for accreditation and can bring forward the next periodic assessment of the institution. ANVUR could not supply the criteria and process for making the latter decisions to bring forward periodic assessments.

The review panel discusses extensively throughout this report how ANVUR is piloting a new approach to the periodic assessment of AFAM institutions, drawing on and adapting good practice from the equivalent AVA system for universities. This addresses the recommendation from the last review.

## **Analysis**

Each process is pre-defined and published in some form by ANVUR, except for the initial accreditation of PhD programmes, which relied solely on the Ministry-issued decree until recently. This has since been rectified and a revised process with ANVUR-issued guidelines is now in place. However, the quality and usefulness of the information published are variable and, in some cases, not sufficient.

There is no standardised approach to producing and publishing a definitive guide to the aims, methods, and evaluation criteria of each EQA activity. While training and briefings help staff, experts, and institutions to navigate the documentation that does exist, and experienced review coordinators further support the consistent implementation of processes, the current documentation cannot be considered wholly reliable or useful because of the risk of confusion that it presents.

Most of the EQA activity consistently includes a self-assessment, an external assessment by a panel of experts and a report resulting from this external assessment. The cases where a site visit is not used are all reasonable, but ANVUR should take care to be consistent in its approach for similar processes across different sectors and types of provision.

The distinct role of Evaluation Boards in Italian universities and AFAM institutions supports an approach to follow-up that shares responsibility with the institutions themselves, and the review panel consider this to be positive. It is reasonable that an institution's failure to improve can lead to ANVUR bringing forward the date of the next periodic assessment, but there is room for improvement by publishing the criteria upon which these decisions for intervention are made by the Governing Board.

ANVUR has significantly improved its support for Evaluation Boards in recent years, including standardising and modernising their regulation with the Ministry, introducing a network of AFAM Evaluation Boards to complement its longer-standing equivalent for University Evaluation Boards, evolving the guidance to Evaluation Boards on the annual reports they are expected to produce, and developing a deeper collaboration with convenors and representatives of Evaluation Boards. This helps to further improve the effectiveness of Evaluation Boards as part of the QA ecosystem in Italy and their role in consistently following up on the outcomes of ANVUR's EQA activities.

Overall, the implementation of ANVUR's EQA activities aligns with the approach expected by the ESG and appears to ensure consistency for institutions seeking accreditation. However, there is still a notable risk to that consistency until improvements are made to the published documentation for each EQA activity and the ongoing maintenance of that documentation. This will become even more important if a simplified regulatory framework can be agreed with MUR but will nonetheless make a tangible difference in the meantime too by bringing together MUR's regulatory requirements with improved guidance from ANVUR in one place.

### **Panel commendation**

C08 The support for and formalisation of Evaluation Boards to have a positive impact on quality assurance and building a quality culture across Italian higher education, including their role in following up on outcomes from ANVUR's processes.

### **Panel recommendation**

R11 Develop and publish a comprehensive, definitive guide for each EQA activity that simplifies, clarifies, harmonises and brings together the aims, practical guidance on the methodology, the standards/criteria for evaluation, and the decision-making criteria into one place so that they are transparent and easy to use for institutions, experts and the agency.

### **Panel suggestion for further improvement**

S10 Define and publish the decisions available to the Governing Body when Evaluation Boards report that an institution has made insufficient progress towards the recommendations of previous EQA activities during the follow-up stage, and publish these together with the criteria for making such decisions in the definitive guide to each procedure.

### **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).

### 2019 review recommendation

“The panel recommends to involve student experts in all external quality assurance activities.”

#### Evidence

The SAR sets out that ANVUR engages around 1,200 external experts across its EQA activities, encompassing a range of expertise. As well as QA system experts, academic discipline experts and student experts, ANVUR engages experts with specialist expertise in financial management and sustainability, distance learning and doctoral education. A group of 100+ Review Coordinators completes the pool of experts and brings a depth of experience in external QA procedures to organise and support other experts to implement ANVUR’s methodologies consistently.

In addition to the SAR, the review panel reviewed a range of training materials and calls for experts, accessed the Experts Registers available on ANVUR’s website, and met a range of experts during the site visit, including a productive meeting with a wide range of ANVUR’s student experts.

For most EQA procedures, an Evaluation Expert Commission (Commissione di esperti della valutazione, CEV) is established and always includes the President (chairperson) of the commission and a student expert. Beyond this, the size and composition of the panel differs for each EQA activity according to the published methodology and for the institution being evaluated depending on its size and disciplinary mix.

The relatively new procedure for the Initial Accreditation of Schools of Advanced Studies is conducted in English and the expert panel includes an international expert. ANVUR recognises that progress towards involving international experts beyond this is slower than they would like, largely because of language barriers, but appreciates the value they add in the context of an Italian higher education system that wants to become more internationalised.

The initial accreditation of PhD programmes is the one exception where external experts have not previously been used, but instead, they have been undertaken only by ANVUR staff. A recently approved change to regulation by MUR has introduced a revised methodology for this activity, including the use of external experts from 2024. No procedures had yet been completed using this revised methodology by the time of the site visit.

Experts are recruited through open calls to join the public register of experts for each EQA activity or group of activities. Experts confirmed that they are increasingly undertaking procedures across sectors, which contributes positively to the harmonisation and capacity building between universities, schools of advanced studies and AFAM institutions.

Experts undergo mandatory training before they are first assigned to a panel. This covers the expected range of topics, but ANVUR leaders and staff recognise an ongoing need to improve and add to the training over time. ANVUR’s learning from its thematic analysis and other enquiry work (e.g. on support for students with disabilities) informs its thinking about the evolution of training, and ultimately, the more nuanced focus that its expert panels have during EQA activities.

## **Analysis**

The range of evidence and discussions all consistently demonstrated the importance of the expert community to ANVUR and its work. The deliberate efforts to improve the range, number and outputs of experts have a positive impact on the quality of ANVUR's operations and a strong awareness among ANVUR's leaders and staff of how training and support need to evolve further in the future. There was some evidence of this work with experts being coordinated across teams and EQA activities within ANVUR, and the review panel encourage the agency to be even bolder in seeing this as a shared operation to be developed strategically in the years to come.

The review panel were pleased to see changes to the initial accreditation of PhDs, which has been ANVUR's one remaining EQA activity without external experts involved. This change is still to be fully implemented and it is not possible to evaluate evidence of this working effectively, but the approach mirrors that used for other EQA activities and is likely to be successful in aligning with this ESG standard going forward. This is an example of ANVUR not being able to make changes to its methodologies in a timely way because of the highly prescriptive regulatory framework that requires ministerial/legislative approval, as discussed elsewhere in this report in more detail (ESG 3.3, 2.1).

There are clear distinctions between the roles and tasks of the different experts, which helps to develop a familiar way of approaching accreditations and reviews. Each role has a notional volume of work calculated for it and payments to experts are based on this. Responding to recommendations in the last ENQA review, commissions always include a student expert and student experts are now paid at an equal rate to other experts completing the same volume of work. This represents a significant improvement since the last ENQA review.

Despite the strong engagement at a national level between ANVUR and representative bodies of industry and society, and ANVUR's remit for evaluating institutions' third mission, there was limited evidence of panels including experts with this perspective. The agency may wish to consider the value this could add to EQA processes, especially those more mature processes (e.g. AVA) that need to evolve to continue adding new benefits and learning for institutions.

There is some encouraging progress towards the involvement of international experts, and ANVUR voiced their desire to broaden this in support of ANVUR's strategic focus on internationalisation. Given the strategic value that more international panels could achieve, ANVUR should consider the full range of options for achieving this, including some degree of choice for institutions that may opt for a procedure undertaken in English.

Overall, there is compelling evidence of ANVUR's compliance with this standard and commitment to developing a thriving community of experts. This will continue to serve the agency well and, especially as experts work across sectors and methodologies, will have a positive and lasting impact on building an even stronger quality culture across Italian higher education.

### **Panel suggestions for further improvement**

- S11 Explore how international experts could be involved in a wider range of EQA activities, either as standard or on an optional basis, where this would particularly support the institution's mission.
- S12 Explore the potential role and benefit of an expert drawn from industry or society to broaden further the expertise and perspective of expert panels.
- S13 Consider how best to strategically develop and resource the training and development of experts across different EQA activities, potentially seeing this as an integrated agency-wide task led by ANVUR staff with specialist capabilities.

## 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 SAR summarises how the formal outcomes are reached for each EQA activity (pages 64-67), which typically involves the Evaluation Expert Commission reaching a preliminary conclusion and the Governing Board then reaching a final decision in the form of a recommendation to MUR. The review panel discussed the application of these processes with ANVUR staff, experts, institutions, and the Governing Board, and then specifically requested further evidence during the site visit of the criteria guiding the Governing Board's decisions on the formal outcomes.

There is a documented set of evaluation criteria in place for each EQA activity, and, for some activities, they are elaborated through more detailed 'points for attention'. The method for each activity systematically leads to the Evaluation Expert Commission reaching a view on whether each evaluation criterion is met. Notwithstanding comments elsewhere in this report about criteria sometimes being prescribed in detail in ministerial decrees and not being set out in a comprehensive guide for the EQA activity, the experts and institutions met by the panel had no concerns about the availability and centrality of such criteria in practice. However, the review panel had to be supplied with direct links upon request after initially being unable to locate each set of criteria on ANVUR's website.

The documentary evidence and discussions during the site visit all confirm that an institution's compliance with the evaluation criteria is the basis for determining the overall formal decision from the process, both for the expert panel in recommending an outcome and for the Governing Board in ratifying or revising that outcome.

The Governing Board makes the formal decision at the end of each process, which is subsequently recommended to the Ministry for adoption. One member of the Governing Board considers the expert panel's report in greater depth and introduces it to the meeting (SAR page 54), but the whole Governing Board engages with and takes responsibility for the final decision made. This stage is, in part, intended to ensure greater consistency of outcomes, noting that different expert panels can judge two similar situations differently. The Governing Board confirmed that this stage of 'moderation' allows any such discrepancies to be given further attention and may lead to the Governing Board giving a different view to an expert panel.

#### Analysis

The focus and conclusion of the Evaluation Expert Commission in each of ANVUR's EQA processes is guided by a documented set of evaluation criteria. These criteria vary in detail between activities and vary in how much they address the effectiveness of internal quality assurance systems (as discussed for ESG 2.1), but the review panel were still able to conclude that the approved criteria are applied consistently by experts. As ANVUR implements its new website, planned for 2024, and addresses the recommendation in ESG 2.3 to publish a definitive guide for each EQA activity, there is an opportunity to standardise and improve how these criteria are published.

A final stage of moderation and ratification by an official body of the agency is a sensible and familiar stage of such accreditation processes in the European Higher Education Area. The Governing Board and the staff who support them could verbally report some of the principles or criteria driving their decision on whether the outcome should be positive or negative but were not able to provide a documented summary of these when asked.

ANVUR takes care to avoid a formulaic approach for most processes whereby a certain number of evaluation criteria being met automatically results in a positive decision. For five initial accreditation activities, they take a more holistic view case-by-case that considers the context of the institution, and which particular criteria are met or not. While not explicitly confirmed by staff or the Governing Board, the review panel observed that greater implicit weighting or importance is attached to some criteria over others, but the agency was unable to evidence where this is codified or documented to ensure a consistent approach. Instead, they asserted that they could rely on their judgement as very senior public officials and the training of external experts.

The review panel concluded that the Governing Board formed shared perspectives over time, and careful attention was paid to moderation, resulting in consistent decisions. The review panel were assured by this and the broader efforts detailed above to ensure consistency between Evaluation Expert Commissions, and consider that there is sufficient evidence of compliance with this. However, there is a risk created by not at least documenting the broad principles for reaching such decisions, which could easily be rectified without limiting the expert judgement applied by the Governing Board.

### **Panel recommendation**

R12 Document and publish the guiding principles/criteria on how the Governing Board reaches recommendations to the Ministry on accreditation decisions to improve transparency of decision-making and secure consistency of approach in the long term.

### **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.

### **2019 review recommendation**

“The panel recommends to publish full reports by the experts not only clear and accessible to the academic community but also to external partners and other interested individuals.”

### **Evidence**

The SAR sets out that each EQA activity results in the production of a report by the Evaluation Expert Commission, using a template issued by ANVUR to help towards consistency. The review panel reviewed a sample of reports available on ANVUR’s website and some preliminary documents and templates used by experts to produce their reports. The production, publication and usefulness of reports were discussed during the site visit with ANVUR’s staff, Governing Board and experts, as well as with institutions that ANVUR had recently evaluated.

ANVUR recognises in their SAR that the reports for different activities have similarities and differences. In reviewing reports published on ANVUR's website, using links provided in the SAR, the review panel found stark differences in what is published. (SAR page 69, links embedded below and working at the time of drafting this report)

<b>EQA Activity</b>	<b>Panel's findings</b>	<b>Compliant with ESG 2.6?</b>
Initial accreditation of new universities: <a href="#">2020 and 2021</a> .	Full reports published, including the Governing Board's decision at the end.	Yes
<a href="#">Initial and periodic accreditation of Schools of Advanced Study</a> .	There is a section online ready for the reports to be added, but none were published as of February 2024. An example full report was provided in the annexes to the SAR but are not published (01_b).	No
Initial accreditation of study programmes: <a href="#">2023-2024</a> ; <a href="#">2022-2023</a> .	Very brief summary reports for positive decisions in 2022-23 are available online, but not for 2023-24 as of February 2024. No reports are published where accreditation is refused. Examples of full reports were provided in the annexes to the SAR but are not published (01_d, 01_e).	No
Initial accreditation of PhD programmes: <a href="#">XXXIX cycle</a> ; <a href="#">XXXVIII cycle</a> .	Summary table of decisions published, but no report for each programme. No such reports supplied in the supporting evidence.	No
Periodic assessment of universities and their study programmes: <a href="#">AVA 3</a> ; <a href="#">AVA 1 and AVA 2</a> .	Comprehensive summary reports published (positive and negative), alongside detailed experts' report and the Governing Board's decision.	Yes
<a href="#">Initial accreditation of new private AFAM institutions and their proposed study programmes</a> .	Summary reports are published (positive and negative), but not the full report.	No
<a href="#">Initial accreditation of new AFAM study programmes</a> .	The webpage lists the Level 2 programmes (second cycle degrees) approved and not approved, only for academic year 2021/22. There is one report summarising the outcomes for the approved programmes only. There is no equivalent for programmes not approved. There is no individual full report for each programme.  There is no equivalent webpage showing outcomes for Level 1 programmes (second-cycle degrees).	No
Periodic assessment of AFAM institution and their study programmes – <a href="#">established process for private institutions</a>	Very brief summary reports for positive decisions in 2022 are available online, but not for negative or conditional decisions. There are no reports for any other year published.	No

EQA Activity	Panel's findings	Compliant with ESG 2.6?
Periodic assessment of AFAM institutions and their study programmes – <a href="#">pilot process for public institutions</a> .	Full reports are published (in both Italian and English) for the three procedures completed so far.	Yes

ANVUR's leaders and staff discussed how they are working towards greater standardisation of periodic assessment reports across its activities for universities and AFAM institutions. These are typically more evaluative and qualitative, given the purpose of the process to support ongoing quality enhancement and the graded judgement resulting from the process (compared to a simple positive/negative outcome from an initial accreditation). A more structured approach to drafting these reports, based on submissions from each member of the expert panel using templates, was introduced for periodic assessment of universities in AVA 3 and this helped towards improving the quality and consistency of reports. The pilot of a new parallel process for AFAM institutions is adopting a similar approach, but otherwise, the reports for private AFAM institutions continue to be published using an older approach, pending the approval of a new regulatory framework for AFAM institutions by the Ministry (see ESG 3.3).

For all procedures, there are well-established processes of an ANVUR officer proofreading the report and checking it for completeness, and of sending the draft report to the institution so that they can comment on the factual accuracy of the report.

The review panel heard consistently from institutions that they found ANVUR's EQA processes useful for better understanding their strengths and areas for improvement in quality and quality assurance, in part due to the reports. This is largely related to periodic assessment processes, but also the newer procedures for initial accreditation of PhD programmes and Schools of Advanced Studies.

### Analysis

ANVUR's efforts to improve the quality and production of reports have resulted in some progress, especially to the benefit of the universities, Schools of Advanced Studies and three public AFAM institutions that have undergone recently developed institutional accreditation and periodic assessment processes. The evidence from institutions was clear: ANVUR's work, including these reports, is helping them better understand their internal quality assurance systems' effectiveness and build a quality culture.

However, there are still significant gaps and weaknesses in ANVUR's approach to reporting. Where reports are published for other EQA activities, they are very short summaries of the final decision and are limited in usefulness for the institution's stakeholders and the public. In some cases, only reports or details of decisions are published where the outcome is positive. For some EQA activities, the ANVUR website has just one year of reports published and is not up to date with more recent reports. In summary, there are some EQA activities where reports are not published, not clear and not accessible as this standard requires. The recommendation from the last review has not been addressed adequately, and the intention of that recommendation must be restated again.

ANVUR's leaders recognise the need for further improvement in reporting. Their focus is largely on supporting experts to draft better quality and more consistent reports. The review panel agrees that this is an important part of the response needed. However, ANVUR should go further and initiate a more strategic overhaul of its approach to reporting, ensuring a clear agency-wide framework that understands the audiences of its reporting and their needs and implements a consistent approach to reporting that meets these needs and explicitly ensures compliance with ESG 2.6 for all EQA activities.

### Panel recommendation

- R13 Agree and implement an agency-wide approach to the publication of full reports from all EQA activities, regardless of whether the outcome is positive or negative. Reports should include the conclusion by the Evaluation Expert Commission and the decision of the Governing Board.
- R14 Continue to standardise the templates for reports across EQA activities, improve the usefulness of their qualitative content to different audiences, and make them more visible.

### Panel conclusion: Partially 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 panel recommends to make more transparent and accessible the existing internal mechanisms, the actors involved and the detailed procedure of both complaints and appeals, respectively against procedural issues and against all decisions.”

### Evidence

The agency has introduced and published a procedure for the consideration of appeals on its website. Institutions and other interested parties are directed to this procedure as they engage with ANVUR in an EQA activity, and the review panel heard about its existence from a range of stakeholders during the site visit.

The SAR sets out that a Guarantee Committee has been established to consider appeals submitted as part of the process, and the review panel met with its members during the site visit. The Guarantee Committee comprises five members: the chairperson, a lawyer appointed by the State Attorney General, two academic members, and two student members (one from a university and one from an AFAM institution for both the academic and student members). ANVUR’s Advisory Board chooses the academic and student members following the nomination of three candidates for each position by the relevant representative body. This ensures the Governing Board and ANVUR staff do not determine the membership of the Guarantee Committee.

Where the Guarantee Committee finds that there is a valid challenge and upholds an appeal, it is empowered to make recommendations to the Governing Board on the outcomes. In turn, the Governing Board may choose to reconsider the original decision, taking into account the newly available evidence or confirm the original decision.

The Guarantee Committee discussed the four appeals considered since the procedure and committee were introduced in 2021. While none were upheld, each case varied in nature and appeared to test the method differently. For example, they related to different institutions and procedures, and they variously challenged their fair treatment by expert panels, the evidence underpinning a panel’s judgement, and the discrepancy in outcomes between ANVUR’s evaluation and unrelated evaluations by other bodies. This was viewed positively by and has built confidence in ANVUR and among stakeholders that this provides a fair and robust channel for considering appeals.

Complaints about improper or unethical behaviour can similarly be submitted for consideration, but these are directed to either the Governing Board or to a Board of Guarantors (see page 13) tasked with investigating potential breaches of ANVUR's Code of Ethics.

Furthermore, as a public administration body, ANVUR has implemented the PAWhistleblowing platform as a means for combatting maladministration.

### **Analysis**

Between the various processes outlined above, there are meaningful opportunities for complaints and appeals to be considered fairly through the clearly defined processes and for appropriate outcomes to be reached. This is a significant improvement since the last ENQA review of ANVUR and addresses the recommendation from that review.

Higher education institutions that might want to take up the opportunity to complain or appeal appeared aware of the opportunity to do so, and the information published online about the processes would be helpful in guiding them to do so. Furthermore, those stakeholders involved in the Guarantee Committee and in the wider sector were positive about the steps that ANVUR has taken to formalise its appeals process in particular. This is viewed as part of a wider shift in recent years to become a more open, transparent and engaged organisation.

As with other areas of its operations, ANVUR should periodically review the effectiveness of its approach to handling complaints and appeals, and use any learning to refresh the relevant processes and governance arrangements.

**Panel conclusion: Compliant**



# ADDITIONAL OBSERVATIONS

## ANVUR'S EVOLUTION AND PLACE IN ITALIAN HIGHER EDUCATION

ANVUR is a growing, maturing organisation that is very well served by its respected, capable staff and leadership. The transformation of the organisation in recent years is immediately evident, not least because it is enthusiastically recognised and celebrated by ANVUR's stakeholders in Italian Higher Education and society. There is valuable synergy in the work of the agency across the evaluation of Teaching and Learning and of Research, which again is celebrated by its stakeholders.

The impact of ANVUR in the broader evolution of the Italian higher education sector is significant and perhaps best demonstrated with respect to increasingly bringing AFAM institutions into Italian quality assurance frameworks and procedures.

ANVUR's operating environment is complex and can be restrictive – especially the traditions of such detailed legislation in Italy, ANVUR's status as a public body, the intertwined roles of ANVUR and the Ministry of Universities and Research. This presents a tension with the more typical expectations of quality assurance agencies in the EHEA and ANVUR's independence needs careful consideration if the Italian higher education system wants to achieve greater European integration.

## SIMPLIFYING ANVUR'S OPERATIONS

ANVUR has made good progress towards greater alignment with the ESG in recent years despite the challenging environment in that time, not least a global pandemic and regular governmental changes. For example, developing the AVA 3 framework and a pilot methodology for periodic assessment of AFAM institutions demonstrate a strong understanding of what a good, well-aligned approach looks like. There is still room for improvement in aligning fully with the ESG, and ANVUR is moving in an effective direction that is progressively more consistent with the ESG.

There will always need to be some diversity of approach across ANVUR's many responsibilities and activities, but there are many pressing opportunities for further simplification, harmonisation and collaboration between different teams and activities so that it becomes easier for stakeholders to work across those processes, and easier for ANVUR to evidence its full alignment more holistically with the ESG

ANVUR recognises that it needs to strengthen its approach to communications, building awareness of its work and publishing information about and resulting from its work. The review panel agrees and encourages ANVUR to think strategically and ambitiously about its approach to communications going forward. In particular, replacing ANVUR's website and improving the approach and consistency when publishing information, resources and reports for each of its EQA activities.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

- C01 The agency's strategic transformation, ethos, and collaborative approach in recent years, as recognised and celebrated by its stakeholders in the higher education system. (ESG 3.1)
- C02 The rapid progress towards effectively engaging stakeholders, especially the Advisory Board, in the agency's work to achieve a more participative ethos. (ESG 3.1)
- C03 The agency makes a major contribution to the understanding and development of the Italian higher education sector through its original research and analysis of national datasets. (ESG 3.4)
- C04 Dedicated, highly qualified and well-respected staff represent the agency well and build trust with their stakeholders. (ESG 3.5)
- C05 The collaborative approach to developing and piloting periodic assessment of public AFAM institutions. (ESG 2.2)
- C06 The thoughtful, iterative and collaborative approach to evolving AVA in its third cycle. (ESG 2.2)
- C07 The evolution of quality assurance procedures, both internal and external, related to PhD programmes that have started to embed a stronger quality culture across the sector. (ESG 2.2)
- C08 The support for and formalisation of Evaluation Boards to have a positive impact on quality assurance and building a quality culture across Italian higher education, including their role in following up on outcomes from ANVUR's processes. (ESG 2.3)

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

<u>ESG</u>	<u>Judgement</u>
<b>3.1 Activities, policy, and processes for quality assurance</b>	<b>Compliant</b>
<i>Recommendations</i>	
R01	Work with the Ministry of University and Research to ensure that the Governing Board and Advisory Board include the expertise and experiences of AFAM institutions.
R02	Build on triennial plans for delivering ANVUR's activities by incorporating the longer-term, more strategic ambitions shared by the agency's leadership so that stakeholders can inform these and more effectively steer the organisation's development.
<b>3.2 Official status</b>	<b>Compliant</b>
<b>3.3 Independence</b>	<b>Partially compliant</b>

## ESG

## Judgement

### *Recommendation*

R03 Work with the Ministry of University and Research to simplify legislation and regulation so that they focus only on the main goals and outcomes that EQA activity needs to achieve. Transfer the evaluation criteria and processes to ANVUR-issued guidelines that can be changed with more agility.

### **3.4 Thematic analysis**

**Compliant**

### *Recommendation*

R04 More systematically and critically use the qualitative findings and analysis from EQA procedures to inform the already impressive range of quantitative analysis, publications, and influence on the Italian higher education system so that they can inform improvements.

### **3.5 Resources**

**Compliant**

### *Recommendations*

R05 Work with the relevant ministries to build greater resilience and flexibility into ANVUR's financial planning to lessen the impact of occasional tasks and staff secondments on delivering core business.

R06 Improve the digital platforms and their interoperability and streamline the data collection processes jointly used by ANVUR and the Ministry for Universities and Research.

### **3.6 Internal quality assurance and professional conduct**

**Compliant**

### *Recommendation*

R07 Be more joined-up, deliberate and consistent in ANVUR's overall approach to Internal Quality Assurance, and document this to maximise consistency and especially for the benefit of the many new staff joining.

### **3.7 Cyclical external review of agencies**

**Compliant**

### **2.1 Consideration of internal quality assurance**

**Partially compliant**

### *Recommendations*

R08 Complete work underway in response to the 2019 recommendation that ANVUR extends consideration of the internal quality assurance processes described in Part I of the ESG to all of the agency's external QA activities falling within the scope of the ESG. Pay particular attention to the Ministry's approval of a regulatory framework for quality assurance in AFAM institutions and ANVUR's publication of its evaluation methods.

## ESG

## Judgement

R09 Be more consistent and transparent across different sectors and levels of provision when holistically applying Part I of the ESG across initial accreditation and periodic assessment activities.

### **2.2 Designing methodologies fit for purpose** **Compliant**

#### *Recommendation*

R10 More explicitly define and consistently publish the purpose and aims of each EQA activity, beyond securing accreditation from the Ministry.

### **2.3 Implementing processes** **Compliant**

#### *Recommendation*

R11 Develop and publish a comprehensive, definitive guide for each EQA activity that simplifies, clarifies, harmonises and brings together the aims, practical guidance on the methodology, the standards/criteria for evaluation, and the decision-making criteria into one place so that they are transparent and easy to use for institutions, experts and the agency.

### **2.4 Peer-review experts** **Compliant**

### **2.5 Criteria for outcomes** **Compliant**

#### *Recommendation*

R12 Document and publish the guiding principles/criteria on how the Governing Board reaches recommendations to the Ministry on accreditation decisions to improve transparency of decision-making and secure consistency of approach in the long term.

### **2.6 Reporting** **Partially compliant**

#### *Recommendations*

R13 Agree and implement an agency-wide approach to the publication of full reports from all EQA activities, regardless of whether the outcome is positive or negative. Reports should include the conclusion by the Evaluation Expert Commission and the decision of the Governing Board.

R14 Continue to standardise the templates for reports across EQA activities, improve the usefulness of their qualitative content to different audiences, and make them more visible.

### **2.7 Complaints and appeals** **Compliant**

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, ANVUR is in compliance with the ESG.

## SUGGESTIONS FOR FURTHER IMPROVEMENT

- S01 Explore alternative models of governance that separate the organisation's strategic governance, decision-making about formal outcomes from EQA processes, and the work of the Governing Board as ANVUR's Executive so that stakeholders, including students, can more directly take part in decision-making about the agency's long-term future and EQA processes. (ESG 3.1)
- S02 Consider asking the Ministry to simplify and reduce the regulation on ANVUR's internal structures, namely the organisational units and the composition of the Advisory Board, so that these can more flexibly adapt to support ANVUR's strategy. (ESG 3.3.)
- S03 Learn more about the demand from institutions for ANVUR to share good practices and consider how this could be done effectively and sustainably. (ESG 3.4)
- S04 Make full use of the analysis of annual reports by University/AFAM Evaluation Boards as part of the evidence base for thematic analyses. (ESG 3.4)
- S05 Further enhance the support for staff undertaking professional development opportunities, ensuring that all staff are regularly engaged in discussions about and document their development and that ANVUR's longer-term strategic goals inform these discussions. (ESG 3.5)
- S06 Formalise ANVUR's expectations for stakeholder engagement in the design and periodic review of EQA activities and in the use of feedback from experts and institutions upon completing a procedure. (ESG 3.6)
- S07 Consider how best to share feedback from experts and institutions between ANVUR's teams, identify similar themes in the feedback across EQA activities, and take a joined-up approach to addressing shared challenges and opportunities. (ESG 3.6)
- S08 Apply the good practice of an international working group to develop new approaches to QA in the AFAM sector when reviewing other areas of activity. (ESG 2.1)
- S09 Roll out the approaches used in developing the methods for AVA 3 and the pilot of periodic accreditation in public AFAM institutions, which appear to be hugely positive and productive. (ESG 2.2)
- S10 Define and publish the decisions available to the Governing Body when Evaluation Boards report that an institution has made insufficient progress towards the recommendations of previous EQA activities during the follow-up stage, and publish these together with the criteria for making such decisions in the definitive guide to each procedure. (ESG 2.3)
- S11 Explore how international experts could be involved in a wider range of EQA activities, either as standard or on an optional basis, where this would particularly support the institution's mission. (ESG 2.4)
- S12 Explore the potential role and benefit of an expert drawn from industry or society to broaden further the expertise and perspective of expert panels. (ESG 2.4)
- S13 Consider how best to strategically develop and resource the training and development of experts across different EQA activities, potentially seeing this as an integrated agency-wide task led by ANVUR staff with specialist capabilities. (ESG 2.4)

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

### Advance Meeting: 09 January 2024

#	Time (CET)	Group	Attendees
	12:00 – 12:30 (30 mins)	Private team meeting	
0	12.30 – 13.30 (1 hour)	Agency resource persons - advance meeting	Director Manager, Evaluation of HEIs Manager, Evaluation of Research
	13:30 – 14:00 (30 mins)	Private team meeting	

### Day 0: Sunday 21 January 2024

#	Time (CET)	Group	Attendees
	16:30 – 18:00 (1hr 30 mins)	Private team meeting	

### Day 1: Monday 22 January 2024

#	Time (CET)	Group	Attendees
	08:00 – 09:00 (1 hour)	Private team meeting	
01	09:00 – 09:45 (45 mins)	Chair and Head of Agency	President, Governing Board Director

#	Time (CET)	Group	Attendees
	09:45 – 10:00 (15 mins)	Break / private team discussion	
02	10:00 – 10:45 (45 mins)	Team responsible for the preparation of the SAR [Interpreter present]	Governing Board member Officer, Head of AFAM Unit Officer, Head of PhD, Scientific journals & ASN Unit Officer, Head of AVA Unit Officer, Internationalisation and AFAM Unit External consultant
	10:45 – 11:00 (10 mins)	Break / private team discussion	
03	11:00 – 12:15 (1hr 15 mins)	Management Team (including Director of the Agency)  [Interpreter present]	Director Manager, Evaluation of HEIs Manager, Administration and Accounting Manager, Evaluation of Research Officer, Budget Officer, Human resources Officer, Performance Officer, Secretariat and Internationalisation Units
	12:15 – 13:15 (1 hour)	Lunch / private team discussion	
04	13:15 – 14:15 (1 hour)	Staff involved in the initial and periodic accreditation of Universities and their study programmes (including PhD programmes)  [Interpreter present]	Officer, Head of AVA Unit Officer, AVA Unit Officer, AVA Unit Officer, AVA Unit Officer, AVA Unit Officer, Head of PhD, Scientific journals & ASN Unit
	14:15 – 14:30 (15 mins)	Break / private team discussion	

#	Time (CET)	Group	Attendees
05	14:30 – 15:15 (45 minutes)	Staff involved in the initial and periodic accreditation of AFAM Institutions and study programmes	Officer, Head of AFAM Unit Officer, AFAM Unit Officer, AFAM and Internationalisation Units Officer, AFAM unit
	15:15 – 15:30 (15 mins)	Break / private team discussion	
06	15:30 – 16:30 (1 hour)	Review Panel Experts involved with accreditation and assessment QA procedures for universities and AFAM institutions  [Interpreter present]	<i>Universities and Schools of Advanced Studies</i> System expert (SAS) (University of Trento) System expert (University of Bari) System expert (Cattolica University, Milan) Discipline expert (University of Padua) Financial sustainability expert (Cattolica University, Rome) Review coordinator (University of Ferrara) <i>AFAM Institutions</i> System expert (Tor Vergata University, Rome) System expert (Fine Arts Academy, Naples) Discipline expert (Music Conservatory, L'Aquila) Discipline expert (Fine Arts Academy, Bologna) Financial sustainability expert (Sapienza University, Rome)
	16:30 – 16:45 (15 mins)	Break / private team discussion	
07	16:45 – 17:45 (1 hour)	Governing Board	President (University of Bari) Vice-president (Tor Vergata University, Rome) Board member (University of Cassino) Board member (University of Eastern Piedmont) Board member (Sapienza University, Rome)
	17:45 – 18:30 (45 mins)	Private team meeting	



## Day 2: Tuesday 23 January 2024

#	Time (CET)	Group	Attendees
	08:30 – 09:00 (30mins)	Private team meeting	
08	09:00 – 09:45 (45 mins)	Representatives of the Ministry  [Interpreter present]	Director General for Internationalisation Director General for HE Study Programmes Director General for HE Institutions Manager, Directorate General for HE Institutions Officer, Directorate General for HE Institutions
	09:45 – 10:00 (15 mins)	Break	
09	10:00 – 10:45 (45 mins)	Members of the Guarantee Committee  [Interpreter present]	University professor (Univ. of Verona) AFAM professor (ISIA Design Institute, Florence) AFAM student (Fine Arts Academy, Bologna)
	10:45 – 11:00 (15 mins)	Break	
10	11:00 – 12:00 (1 hour)	Meeting with HEIs (1 of 2)  <i>Meeting focused on universities.</i>  [Interpreter present]	<i>Rectors</i> Rector (University of Milan) Rector (University of Turin) Rector (Sant'Anna SAS, Pisa) Rector (IUSS SAS, Pavia) Rector (University of Udine) <i>Quality Committee members</i> Quality Committee President (University of Trieste) Quality Committee President (Bocconi University, Milan)
	12:00 – 12:15 (15 mins)	Break / private team discussion	

#	Time (CET)	Group	Attendees
11	12:15 – 13:15 (1 hour)	Meeting with HEIs (2 of 2)  <i>Meeting focused on AFAM institutions.</i>  [Interpreter present]	Director (Fine Arts Academy, Rome) CEO (Accademia Costume & Moda, Milan-Rome) Director (Fine Arts Academy, Macerata) Director (ISIA Design Institute, Rome) Director (Music Conservatory, Castelfranco Veneto) QA Manager (NABA Fine Arts Academy, Rome-Milan)
	13:15 – 14:00 (45 mins)	Lunch / private team discussion	
12	14:00 – 14:45 (45 mins)	Representative bodies of universities and AFAM institutions, and other national bodies in higher education or industry who are stakeholders for ANVUR  [Interpreter present]	<i>Universities and AFAM</i> Rector of the University of Catania, Conference of Rectors (CRUI) President, National University Council (CUN) Coordinator, National Coordination of University Evaluation Boards (CONVUI) Coordinator, National Coordination of University Quality Committees (CONPAQ) President, Conference of University Directors (CODAU) / ANVUR Advisory Board member President, National Council for Higher Artistic and Musical Education (CNAM) <i>Industry</i> General Confederation of Italian Industry (Confindustria) ANVUR Advisory Board ANVUR Advisory Board member / National Council for Economics and Labour (CNEL) President of CINECA / ANVUR Advisory Board member
	14:45 – 15:00 (15 mins)	Break / private team discussion	

#	Time (CET)	Group	Attendees
13	15:00 – 15:45 (45 mins)	Student experts involved with accreditation and assessment QA procedures for University and AFAM institutions  [Interpreter present]	<p><i>Student representative bodies (University and AFAM)</i>  President, National University Student Council (CNSU)  President, National Council of Conservatory Students (CNSI)  President, National Council of Art and Design Academies (CPCSAI) / AFAM student expert  <i>University student experts (including membership in CPDS, NdV, PQA)</i>  Student expert, also member of CPDS, PQA, representative in CNSU (Sapienza University, Rome / University of Bari)  Student expert, SAS (SNS SAS, Pisa /University “Federico II”, Naples)  Student expert, also member of CPDS, PQA, Quality Board of University Alliance (University of Turin)  Student expert, member of PQA (University of Parma)  Student expert, also CPDS and student representative in University Alliance (Ca' Foscari University, Venice)  <i>AFAM student experts</i>  Student expert (National Dance Academy, Rome)  Student expert (Music Conservatory, Matera)</p>
	15:45 – 16:00 (15 mins)	Break / private team discussion	
14	16:00– 16:45 (45 mins)	Members of the University and AFAM Evaluation Boards  [Interpreter present]	<p><i>Universities</i>  President (University of Perugia)  President (Sapienza University, Rome)  Member (former MUR Secretary General)  Member (University of Eastern Piedmont)  Member (University of Bari)  <i>AFAM Institutions</i>  President (former University of Bergamo)  President (Music Conservatory, Brescia)  President (retired, former Music Conservatory, Frosinone)</p>

#	Time (CET)	Group	Attendees
	16:45 – 16:50 (5 mins)	Break / private team discussion	
15	16:50 – 17:10 (20 mins)	Agency contact persons	Director Manager, Evaluation of HEIs Manager, Evaluation of Research
	17:10 – 18:00 (50 mins)	Private team meeting	

### Day 3: Wednesday 24 January 2024

#	Time (CET)	Group	Attendees
	08:30 – 09:30 (1 hour)	Private team meeting	
16	09:30 – 10:30 (1 hour)	Management Team (including Director of the Agency)  [Interpreter present]	President, Board member Board Member Director Manager, Evaluation of HEIs Manager, Administration and Accounting
	10:30 – 12:30 (2 hours)	Private review team meeting (including lunch)	
17	12:30 – 13:00 (30 mins)	Final de-briefing meeting with key staff and Governing Board members of the agency to inform about preliminary findings  [Interpreter present]	President, Board member Vice-president, Board member Board Member Board Member Board Member  Director

#	Time (CET)	Group	Attendees
			Manager, Evaluation of HEIs Manager, Administration and Accounting Manager, Evaluation of Research

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

### External review of the National Agency for the Evaluation of Universities and Research Institutes (ANVUR) by ENQA

#### TRIPARTITE TERMS OF REFERENCE BETWEEN ANVUR, ENQA AND EQAR

June 2023

##### I. Background and context

ANVUR is the independent national agency in charge for quality assurance of Universities, Research Institutes and Higher Education institutions in the arts, music, and dance (AFAM). Formally established by Presidential Decree no. 76/2010, it is a legal public body with organisational, administrative, and accounting autonomy. Since the introduction of the Quality Assurance system in Italy (by Law no. 240/2010 and Legislative Decree no. 19/2012) the Agency has developed its own criteria, methodologies, and procedures to fulfil its tasks. ANVUR's mandate covers both the initial and periodic accreditation of Higher Education Institutions and their study programmes and the periodic five-year evaluation of research outputs and “third mission” activities of Universities and Research Institutes; it also addresses, at the request of the Ministry, the definition of indicators and benchmarks for the allocation of public funding and the evaluation of its effectiveness and efficiency, or for other purposes (e.g., the National Scientific Qualification procedure). Among other commitments ANVUR is also in charge for the coordination and monitoring of the work done by the University Evaluation Boards (a similar role is also played for the AFAM Evaluation Boards), the development of uniform procedures for the collection of student opinions and the evaluation of the Performance plans drafted by Universities and Research Institutes. The cooperation with EU and international bodies, agencies and administrations operating in the field of Higher Education QA and the production of thematic reports and research contributions are also part of ANVUR institutional activity.

ANVUR conducts both institutional and study programmes assessments (usually referred to as “accreditation”), whose results are the basis for the (initial and periodic) accreditation granted by the Ministry of University and Research following the Agency's proposal. Applications for new Universities are only possible if the Ministry allows them under its three-year programme, and ANVUR evaluation expert panels are charged to verify a set of scientific, didactic, logistics and budgetary conditions. Similarly, newly established Schools of Advanced Studies (mostly delivering PhD programmes) are initially assessed by highly qualified international evaluation expert panels. All new study programmes are initially assessed yearly by evaluation expert groups, to verify the overall quality of the projects and the adequacy and qualification of the involved teaching staffs. Periodic assessment is ruled by the so-called “AVA system” (*Autovalutazione, Valutazione periodica, Accreditamento* – Self-assessment, Periodic Assessment, Accreditation), that is based on self-assessment procedures conducted by the universities (involving their teaching, research and administrative activities), followed by an external assessment by ANVUR, which is performed every five years through a combination of desk analysis and on-site visit by an evaluation expert panel. Periodic assessment includes *inter alia* a detailed examination of a sample of Departments, study programmes and PhD programmes.

The role of ANVUR in the initial and periodic accreditation of AFAM institutions and study programmes is progressively extending from private institutions to full coverage of both private and public sectors.

ANVUR also carries out a wide range of evaluation activities outside the scope of the ESG, among which the assessment of research outputs and “third mission” case studies submitted by Universities and Research Institutes (*Valutazione della qualità della ricerca – VQR, Research Quality Assessment*), that is performed every five years and used to allocate the performance-based share of public funding to the Italian University system.

**ANVUR** has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2019 and is applying for renewal of ENQA membership.

**ANVUR** is applying for inclusion on EQAR.

## **2. Purpose and scope of the review**

This review will evaluate the extent to which **ANVUR** (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.

### **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 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 must be addressed in the external review:

- initial accreditation of new Universities and their proposed study programmes;
- initial accreditation of new Schools of Advanced Studies and their proposed PhD programmes;
- initial accreditation of new University study programmes (including those offered in decentralized branches);
- initial accreditation of new PhD programmes;
- periodic assessment of Universities and their study programmes (including PhD programmes);
- initial accreditation of new private AFAM institutions and their proposed study programmes;
- initial accreditation of new AFAM study programmes;
- initial accreditation of decentralized branches of AFAM institutions and their proposed study programmes;
- periodic assessment of AFAM institutions and their study programmes (private institutions; pilot procedure for public institutions).
- Coordination of the University Evaluation Boards<sup>3</sup>
- Coordination of AFAM Evaluation Boards<sup>4</sup>

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR, unless they have been previously reported.

The self-evaluation report and the external review report is expected to pay specific attention to issues where the Register Committee concluded in [its rejection decision<sup>5</sup> of 16 March 2020](#) that the agency complied only partially with the ESG, namely ESG 2.1, ESG 2.4, ESG 2.6 and ESG 2.7.

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<sup>3</sup> This activity is not an external QA activity in itself but addresses aspects that are transversal to the agency's quality assurance activities related to Universities and AFAM and therefore should be taken into consideration under the corresponding standards i.e. ESG 3.4, ESG 3.6.

<sup>4</sup> See previous note.

<sup>5</sup> See EQAR's decision of 2020:

[https://backend.degar.eu/reports/EQAR/2020\\_03\\_A66\\_RejectionDecision\\_ANVUR.pdf](https://backend.degar.eu/reports/EQAR/2020_03_A66_RejectionDecision_ANVUR.pdf)

Should any substantive changes occur in ANVUR between now and the review (e.g. organisational changes, the introduction of changes of activities within or outside of the scope of the ESG), the agency should inform EQAR as soon as possible to allow for an amendment of the current ToR.

## **2.2 Activities outside the scope of the ESG**

The following activities are outside the scope of the ESG and are not relevant for the application for inclusion on EQAR, but the panel may comment on them as they see fit:

- *Periodic evaluation of the quality of research and “third mission” outcomes (VQR)*
- *Definition of minimum standards of research production for the National Scientific Qualification*
- *Classification of scientific journals in humanities and social sciences*
- *Development and administration of tests on students’ disciplinary and transversal skills*
- *Setting of standards of administrative performance for HEIs and research institutes.*

## **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 ANVUR, ENQA and EQAR (including publishing of the Terms of Reference on ENQA’s website<sup>6</sup>);
- 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.

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<sup>6</sup> The agency is encouraged to publish the ToR on its website as well.



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.

### **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:
  - a brief description of the HE and QA system;
  - the history, profile, and activities of the agency;
  - 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;
  - opinions of stakeholders;
  - 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);
  - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
  - a SWOT analysis;
  - 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*<sup>7</sup> 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.

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<sup>7</sup> 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). 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	July 2023
Appointment of review panel members	September 2023
Self-assessment completed	20 October 2023
Screening of SAR by ENQA Review Coordinator	November 2023
Preparation of the site visit schedule and indicative timetable	December 2023

Briefing of review panel members	December 2023
Review panel site visit	January 2024
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	March 2024
Draft of review report to be sent for a factual check to the agency	April 2024
Agency statement on the draft report to the review panel (if necessary)	April 2024
Submission of the final report to ENQA	May 2024
Validation of the review report by the Agency Review Committee	June 2024
Publication of report	June 2024
EQAR Register Committee meeting and initial consideration	Autumn 2024
Decision on ENQA membership by the ENQA Board	Autumn 2024

## ANNEX 3: GLOSSARY

<b>ANVUR</b>	Agenzia nazionale di valutazione del sistema universitario e della ricerca / National Agency for the Evaluation of Universities and Research Institutes
<b>AVA</b>	Autovalutazione, valutazione periodica, accreditamento / Self-assessment, periodic assessment, accreditation
<b>CEV</b>	Commissione di esperti della valutazione / Evaluation Expert Commission
<b>CINECA</b>	Consorzio interuniversitario per il Calcolo Automatico / Inter-university Consortium for Automatic Calculation
<b>CNAM</b>	Consiglio Nazionale per l'alta formazione Artistica e Musicale / National Council for Higher Education in the Arts and Music
<b>CNSU</b>	Consiglio Nazionale degli Studenti Universitari / Italian National Council of University Students
<b>CODAU</b>	Convegno dei Direttori generali delle Amministrazioni Universitarie / Conference of University Administrative Directors
<b>CONPAQ</b>	Coordinamento nazionale dei Presidi della Qualità di Ateneo / Coordination body of University Quality Committees
<b>CONVUI</b>	Coordinamento dei nuclei di valutazione delle università italiane / Coordination body of the University Evaluation Boards
<b>CRUI</b>	Conferenza dei Rettori delle Università Italiane / Conference of Italian University Rectors
<b>CUN</b>	Consiglio Universitario Nazionale / National University Council
<b>DM</b>	Decreto Ministeriale / Ministerial Decree
<b>DPR</b>	Decreto del Presidente della Repubblica / Presidential Decree
<b>ENQA</b>	European Association for Quality Assurance in Higher Education
<b>ESG</b>	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
<b>HE</b>	higher education
<b>HEI</b>	higher education institution
<b>QA</b>	quality assurance
<b>SAR</b>	self-assessment report
<b>VQR</b>	Valutazione della Qualità della Ricerca / Research Quality Evaluation
<b>WMFE</b>	World Federation for Medical Education

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY ANVUR

ANVUR's Self-Assessment Report links directly to a wide range of materials available online. In addition, ANVUR provided a number of additional documents directly to the panel:

**Annexes to the SAR** (available to the panel from 15 November 2023)

#### 1 – Initial accreditation (universities/study programmes/PhD)

- 01a. Initial Accreditation – Ministerial Decree – UniCamillus [Ministerial Decree concerning the initial accreditation of a new University (UniCamillus)]
- 01b. Initial Accreditation – GSSI [Initial accreditation report of a School for Advanced Studies (Gran Sasso Science Institute)]
- 01c. Periodic Evaluation – Site Visit Agenda – Medicine [Site visit agenda for the initial accreditation of medical study programmes (Catania)]
- 01d. Initial Accreditation – Form – Traditional Programme Siena (LM38) 2023 [Protocol for the initial accreditation of a traditional study programme (Siena, LM38, 2023)]
- 01e. Initial Accreditation – Form – Online Programme UniMarconi (LI) [protocol for the initial accreditation of an online programme (UniMarconi, LI, 2023)]
- 01f. Initial Accreditation – Ministerial Decree – Bologna Study Programmes 2023-2024 [Ministerial Decree concerning the initial accreditation of the study programmes proposed by the University of Bologna for the academic year 2023-24]
- 01g. Initial Accreditation – PhD 2023-24 – GB Resolution [Governing Board resolution concerning the initial accreditation of PhD programmes for the academic year 2023-2024]

#### 2 – Initial accreditation of AFAM institutions and study programmes

- 02a. Initial Accreditation – AFAM Institutions – Art. 11 Raffles (11.07.23) [Assessment on the initial accreditation of a private AFAM Institution (Raffles), 2023]
- 02b. Initial Accreditation – AFAM Study Programmes (27.07.23) [Governing Board decision on the initial accreditation of AFAM Study Programmes, 27th July 2023]

#### 3 – Periodic assessment (universities and study programmes, including PhD programmes)

- 03a. Periodic Assessment – Site Visit Agenda – Humanitas University [Site visit agenda for the periodic assessment of a university (Humanitas University), 2023]
- 03b. Periodic Assessment – Form – Humanitas University [Form for the periodic assessment of Humanitas University – Institution]
- 03c. Periodic Assessment – Department Form – Biomedical Sciences [Form for periodic assessment of Humanitas University – Department]
- 03d. Periodic assessment – Form – Medicine and Surgery (LM-41) [Form for the periodic assessment of Humanitas University – Study programme]
- 03e. Periodic Assessment – Form – Data Science in Medicine and Nutrition [Form for the periodic assessment of Humanitas University – Study programme]

- 03f. Periodic Evaluation – Ministerial Decree – Milan [Ministerial Decree concerning the periodic assessment of the University of Milan, 2021]

#### 4 – Periodic assessment of AFAM institutions

- 04a. Periodic Assessment – Pilot Project – CEV Form [Pilot Project protocol for the periodic assessment of AFAM Institutions]
- 04b. Periodic Assessment – Pilot Project – Site visit Agenda [Site visit agenda for the periodic assessment of ABA Roma]
- 04c. Periodic Assessment – Pilot Project – CEV Final Report [CEV Final Report for the periodic assessment of ABA Roma]
- 04d. Periodic Assessment – Pilot Project – ANVUR Report [ANVUR Report for the periodic assessment of ABA Roma]
- 04e. Periodic Assessment – Pilot Project – Site visit Agenda [Site visit agenda for the periodic assessment of Cons. Benevento]
- 04f. Periodic Assessment – Pilot Project – CEV Final Report [CEV Final Report for the periodic assessment of Cons. Benevento]
- 04g. Periodic Assessment – Pilot Project – ANVUR Report [ANVUR Report for the periodic assessment of Cons. Benevento]

#### 5 – Peer review experts

- 05a. Peer Review Experts – Universities – Expert Training Programme [Training programme for University peer review experts]
- 05b. Peer Review Experts – AFAM – Expert Training Programme [Training programme for AFAM peer review experts]
- 05c. Peer Review Experts – AFAM – Event Calendar – Network of the AFAM Evaluation Boards [Calendar and contents of the meetings of the Network of the AFAM Evaluation Boards]

#### 6 – Complaints and appeals

- 06a. Complaints and Appeals – Guarantee Committee Decision (01/08/23) [Decision of the Guarantee Committee Decision on the request by Foggia University and Link Campus University]
- 06b. Complaints and Appeals – Request for Review by the MUR – Veterinary Medicine Tor Vergata [Request for Review by the MUR for the Veterinary Medicine programme, Tor Vergata University]

#### 6 – Thematic analysis

- 07a. Thematic Analysis – 2023 Report on the State of Higher Education and Research (Intro) [English version of the Introduction to the 2023 Report on the State of Higher Education and Research]
- 07b. Thematic Analysis – 2022 Disability Report (Intro) [English version of the Introduction to the 2022 Disability Report]
- 07c. Thematic Analysis – Teaching Competences Report (Intro): This document is the translated introduction to the Thematic Analysis Report concerning Teaching Competences

## 8 – Stakeholders

- 08a. Stakeholder – Feedback on SAR Form [Form used for collecting feedback from the stakeholders on the Self-Assessment Report (SAR)]
- 08b. Stakeholder – Minister’s Note on ANVUR Programme of Activities 2023-2025 [Note from the Minister of University and Research on ANVUR program of activities for the years 2023-2025]
- 08c. Stakeholder – Universities Expert Feedback Initial Accreditation Study Programmes 2022-2023 [Form used for collecting feedback from universities’ experts on the initial accreditation of study programmes for the years 2022-2023]
- 08d. Stakeholder – AFAM Letter Return Standard Model AQ [Document on feedback given to the stakeholders’ remarks on the model of Standards for the periodic assessment of public AFAM institutions]
- 08e. Stakeholder – AFAM Note Consultation Standards AQ [Request of feedback to AFAM stakeholders on the on the model of Standards for the periodic assessment of public AFAM institutions]
- 08f. Stakeholder – AFAM Expert Feedback Form Pilot Procedure [Form used for collecting feedback from AFAM’s experts on Pilot procedure]
- 08g. Stakeholder – AFAM Institution Feedback Form Pilot Procedure [Form used for collecting feedback from evaluated Institutions on Pilot procedure]

### **Additional evidence requested by the panel**

Supplied 08 January 2024

- E01 ANVUR’s narrative response and commentary to written questions and requests for evidence, along with the evidence itself, in response to each of the following:
- Three examples of documentation showing how stakeholders’ feedback (e.g. minutes of meetings, analysis of consultation responses) has impacted decisions or outputs from ANVUR (draft versions, final versions). [ESG 3.1]
  - ANVUR’s Triennial Activity for 2022-24 and the previous plan before that (2021-23?), along with any papers from meetings of the Governing Body assessing progress towards implementing those plans. [ESG 3.1]
  - Clarification: Is the Triennial Plan the agency’s Strategic Plan? If not, could we please see the strategic plan. [ESG 3.1]
  - SAR Section 5.1, final paragraph, refers to additional and unexpected tasks requested by the Ministry. What were these tasks over the last five years? [ESG 3.1]
  - The agency’s plans or strategies for improving its communications activities, as they exist in written form. [ESG 3.1, 3.6, 2.2]
  - Organizational and Functional Regulation cited in ESG 3.3 and 3.6.
  - Could you highlight the parts of the publications cited in 3.4 Thematic Analysis that show how the findings of ANVUR’s external QA activities inform these outputs? [ESG 3.4]
  - Summary analysis of findings from cycles of external QA activities, if this exists already. [ESG 3.4]
  - ANVUR’s analysis of reports from University Evaluation Boards and AFAM Evaluation Boards in recent years. [ESG 3.4, 3.6]



- A detailed organisational chart showing the current staffing and the new positions being added, and a summary of the numbers of ANVUR staff working on each of the external QA activities in scope for this ENQA review. [ESG 3.5]
- More detailed description on (or highlight in existing documentation) how much ANVUR staff are involved in the various EQA activities and what their specific roles are in the process. [ESG 3.5, 2.3]
- Three examples of how feedback has led to specific actions being agreed and implemented, as part of the processes described for Internal Quality Assurance. [ESG 3.6]
- The questionnaires used with experts (including students) and institutions over the last two years and the summary/analysis of their feedback used by the agency, together with the internal guidelines / standard operating procedures on collecting feedback from experts and institutions. [ESG 3.7, 2.4]

E02 ANVUR's response to a request for confirmation of which documents constitute the process guidelines and evaluation criteria for each EQA activity. Some were available online and some were supplied directly as documents. ("Guidelines and Standards document").

Supplied 16 January 2024

E03 ANVUR's narrative response and commentary to written questions, along with further evidence itself, on:

- Clarifications regarding the Guidelines and Standards document
- Details of ANVUR's Involvement in the drafting of the Decrees issued by the Ministry that govern the Agency's organisation and EQA activities

Supplied 21 January 2024

E04 ANVUR's narrative response and commentary to written questions, along with further evidence itself, on:

- An English translation of Ministerial Decree no. 439/2013.
- With regards to Initial accreditation of new University study programs (including those offered in decentralized branches):
  - Clarification on the status of "Assessment Procedure for new Study Programmes – Academic year 2023/24/Procedura di valutazione dei CdS di nuova istituzione (a.a. 2023-2024)"
  - New Study Programmes Guidelines\_2024-25\_Track changes.pdf showing changes from the 2023-24 version.
  - English translations and analysis of the differences between the standards for the initial accreditation of study programmes, for 1) traditional, 2) remote, and 3) medical programmes.

Supplied 22 - 24 January 2024 (during the site visit)

E05 ANVUR's narrative response and commentary to written questions, along with further evidence itself, on:

- Informal note agreed upon by the Governing Board on February 16, 2022, on the basis of which the President initiated a dialogue with one of the former ministers on some proposals for amendments to Presidential Decree no. 76/2010.
- Examples of how ANVUR looks at the qualitative findings from a set or cycle of procedures over time, and synthesises those findings so that the learning can be used to inform quality enhancement in the higher education sector:

- An extended (unpublished) version of the chapter 2.5 on Quality Assurance of the Biennial Report on the State of the Italian Higher Education and Research System (2023), 2.5\_30.12.2021
- A comprehensive statistical analysis of the reviews conducted with the AVA 2 model
- A network analysis of the University evaluation experts
- For each procedure in scope, the published document that contains criteria for guiding the Governing Board's final decision and which part of the document specifies this.

## ENQA AGENCY REVIEW 2024

THIS REPORT presents findings of the ENQA Agency Review of the National Agency for the Evaluation of Universities and Research Institutes (ANVUR), undertaken in 2024.

**enqa.**

European Association for  
Quality Assurance in Higher Education