ARAGON AGENCY FOR QUALITY ASSURANCE AND STRATEGIC FORESIGHT IN HIGHER EDUCATION (ACPUA)

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24 JUNE 2021

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European Association for
Quality Assurance in Higher Education

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EXECUTIVE SUMMARY

This report analyses the extent to which the Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an ENQA-coordinated external review conducted as part of ACPUA's application for the renewal of its ENQA membership and its registration on the European Quality Assurance Register for Higher Education. The review was carried out between April 2020 and March 2021. The online site-visit to the agency took place between 25 and 27 November 2020. The review panel and the agency agreed to conduct the visit in an online format in view of the restrictions related to the COVID-19 pandemic.

ACPUA was established by the Autonomous Community of Aragon in 2005. As one of the regional agencies in Spain, it operates within a framework for quality assurance set by the national and regional legislation. The agency's quality assurance activities comprise a wide range of programme and institutional (or, more precisely, unit level) reviews and research evaluations. The activities that fall within the scope of this review include: initial accreditation, follow-up and renewal accreditation of programmes; certification of the implementation of an internal quality assurance system; initial institutional accreditation and institutional follow-up accreditation (renewal and follow-up); initial accreditation of higher education institutions; evaluation of partner higher education institutions; training school accreditation; teaching activity evaluation system audit (DOCENTIA); teaching staff evaluation system audit; and Sustainable Development Goals certification (ALCAEUS). However, joint programme review as part of programme accreditation and institutional follow-up accreditation are not fully developed yet as national protocols, which would set an overall framework for ACPUA's processes, have yet to be approved. ALCAEUS is in the pilot phase. Thus, the three processes are addressed in the report to the extent they were developed at the time of the panel's site visit.

The agency has an established legal basis for its activities. It has earned recognition among its stakeholders as a trustworthy institution that is highly professional and committed in carrying forward its quality assurance mission. In recent years, it has extensively and genuinely involved all stakeholder groups, and international experts, in its governance bodies and quality assurance activities. While ACPUA has a close working relationship with its regional stakeholders, it has taken care to safeguard its independence by a clear separation of governance and quality assurance responsibilities within its structures, and by appointing only experts from outside Aragon to its bodies responsible for evaluation processes. With a broad political consensus over stable levels of funding for higher education and recent budget increases, the agency is well provided for, both to conduct its regular quality assurance activities and to expand its development work in line with its strategic plans. The competence and engagement of its staff are highly valued by stakeholders. As part of its development work, ACPUA has produced a number of useful thematic analyses; however, the panel recommends that the agency now take a more systematic and deeper approach to analysing the findings from its quality assurance activities. Although some improvements could still be made, the agency has in place an internal quality assurance system which works well, and its responsiveness to feedback is much appreciated by all stakeholder groups.

Like other agencies in Spain, ACPUA is now moving away from a centralised and highly regulated programme accreditation system to a more autonomous system of institutional accreditation, based on programme reaccreditation and certification of implementation of an internal quality assurance system. Initial institutional accreditation has been introduced only in recent years, and a methodology for institutional follow-up accreditation is not expected to be fully developed until the beginning of 2021.

The evaluation processes in place are designed and conducted, overall, in compliance with Part 2 of the ESG; as the panel is expected to evaluate only what is in place, its conclusions under ESG 2.1, 2.2 and 2.3 do not take into account the processes that were not yet fully developed or implemented at the time of the review. The agency's stakeholders are extensively involved in both the development and continuous improvement of its processes. Insofar as it is possible within the highly regulated

framework, ACPUA has made efforts to design its main processes so that they are fit for the dual purpose of ensuring accountability and supporting quality enhancement, and to ease the burden of its evaluations for higher education institutions. The shift from programme to institutional accreditation will increase further the efficiency of ACPUA's external quality assurance system.

The procedures and criteria for all processes are published, and their clarity and usefulness are appreciated by higher education institutions and experts conducting evaluations. The main processes (in particular, programme accreditation renewal and certification of the implementation of an internal quality assurance system) address to a large extent Part 1 of the ESG, but a systematic and coherent approach to student-centred learning, teaching and assessment has yet to be developed. The main processes also follow the four-step procedure recommended under ESG 2.3; where other processes (for example, initial programme accreditation, training school accreditation, teaching staff evaluation system audit), which can be considered as complementary, do not include all recommended steps (a site visit or follow-up), this is justified, in the panel's view, by their specificity.

The agency has put in place mechanisms for selecting competent and suitable experts for its quality assurance activities, and for ensuring that its evaluation processes are conducted, and the criteria are applied, in a consistent manner. It has also recently introduced a mechanism for improving consistency in its evaluation reports, but reports produced in one or two processes would still benefit from more evidence and more in-depth analysis to substantiate judgments. Finally, although a detailed procedure for dealing with possible ethical issues in the agency's activities would still need to be developed as part of its internal quality assurance system, the system for considering appeals against its decisions or complaints about its conduct ensures transparency, fairness, impartiality and efficiency.

In conclusion, the panel believes that ACPUA is in compliance with the ESG. The panel considers the agency to be fully compliant with ESG 3.1, 3.2, 3.3, 3.5, 3.7, and 2.2, 2.3, 2.4, 2.5 and 2.7, and substantially compliant with ESG 3.4, 3.6, and 2.1 and 2.6.

INTRODUCTION

This report analyses the compliance of the Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (*Agencia de Calidad y Prospectiva Universitaria de Aragón*), ACPUA, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted between April 2020 and March 2021.

BACKGROUND TO 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, to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Based on its first ENQA-coordinated external review, which took place in 2016, ACPUA was granted membership of ENQA and entered on the European Quality Assurance Register for Higher Education (EQAR) in the same year. In 2018, the agency hosted an ENQA Progress Visit. It is now applying for the renewal of its ENQA membership and EQAR registration. The present review has been conducted to evaluate the extent to which ACPUA complies with the ESG. It aims to provide information to the Board of ENQA to aid its consideration of whether ACPUA's membership should be reconfirmed and to EQAR to support the agency's application to remain on the register.

The review addresses the following external quality assurance (EQA) activities of ACPUA as included in the Terms of Reference (ToR) for the review:

- Study programme initial accreditation, including study programme modification, ex-ante evaluation of master programmes in the arts, and joint programme review;
- Study programme accreditation (programme accreditation renewal or reaccreditation)
- Study programme follow-up
- Training school accreditation
- Higher education institution initial accreditation
- Teaching activity evaluation system audit / DOCENTIA Programme
- Teaching staff evaluation system audit
- Partner higher education institution evaluation
- IQAS Certification / PACE SGIC
- Institutional accreditation (initial institutional accreditation)
- Follow-up accreditation (institutional follow-up and accreditation renewal)
- Certification ODS/Agenda 2030 / ALCAEUS Programme

As this is ACPUA'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 at constant enhancement of the agencies.

Institutional follow-up accreditation and ALCAEUS are included in the ToR for the review as new activities that have not yet been fully developed or implemented. The panel also ascertained, during the review, that ACPUA has not conducted, as yet, any joint programme review (as part of programme accreditation) and the process is at the development stage. Thus, the three processes are addressed in the report to the extent they were developed at the time of the review. For institutional follow-up and joint programme review, REACU, the Spanish Network of Higher Education Quality Assurance Agencies, has adopted evaluation protocols which will provide the basis for protocols to be approved by the national bodies and for amendments to the law where required. The COVID-19 pandemic has hampered progress in the adoption of the national protocol for institutional follow-up as discussions focused more on the impact of the pandemic restrictions on teaching and learning and the adaptation of programme accreditation. The national protocol is expected to be adopted at the beginning of 2021.

As regards ALCAEUS, a document describing the evaluation methodology was available before the panel's site visit in November 2020, and the pilot run of the process was scheduled for December 2020.

MAIN FINDINGS OF THE 2016 REVIEW

The 2016 review panel's report concluded that ACPUA was in compliance with the ESG. It found the agency:

- fully compliant with ESG 3.2 (Official status); 3.3 (Independence); 3.7 (Cyclical external reviews); 2.3 (Implementing processes); and 2.5 (Criteria for outcomes);
- substantially compliant with ESG 3.1 (Activities, policy, processes for quality assurance); 3.4 (Thematic analysis); 3.5 (Resources); 3.6 (Internal quality assurance and professional conduct); 2.1 (Consideration of internal quality assurance); 2.2 (Designing methodologies fit for purpose); 2.4 (Peer-review experts); 2.6 (Reporting); and 2.7 (Complaints and appeals).

The recommendations of the 2016 review panel are reproduced and addressed under the corresponding standard in this report. The panel also commended ACPUA for the organisational changes introduced to make its structure clearer and more transparent (ESG 3.1); the involvement of external experts from outside Aragon and Spain to enhance transparency in the agency's decision-making and strengthen its independence (ESG 3.3); the organisation of knowledge-sharing seminars for stakeholders (ESG 3.4) and the open and willing attitude of the agency's staff to work with stakeholders as agents of change and development (ESG 3.6), fostering a quality culture in Aragon; and for the extensive involvement of students as partners in the agency's committees and quality assurance activities (ESG 2.4).

REVIEW PROCESS

The 2020 external review of ACPUA 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 ACPUA was appointed by ENQA and comprised of the following members:

- Padraig Walsh (Chair, ENQA nominee), Chief Executive, Quality and Qualifications Ireland (QQI), Ireland;
- Ewa Kolanowska (Secretary, ENQA nominee), independent consultant, Poland;
- Carmen Fenoll (EUA nominee), Full Professor of Plant Physiology, Head of the Department of Environmental Sciences, University of Castilla La Mancha, Spain;
- Aleksandar Šušnjar (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool), PhD student in Philosophy, Faculty of Humanities and Social Sciences, University of Rijeka, Croatia.

Milja Homan, a project and reviews officer at ENQA, acted as the review coordinator.

ACPUA produced a self-assessment report (SAR) which provided a substantial portion of the evidence that the review panel used to draw its conclusions. The panel conducted a site visit to validate fully the self-assessment and clarify any points at issue. Finally, the panel produced the present final report based on the SAR and findings from the pre-visit meeting with ACPUA's Director and staff and the site visit. It provided an opportunity for ACPUA to comment on the factual accuracy of the draft report. All decisions of the panel were taken by consensus. The panel confirms that it had access to all documents and stakeholders it wished to consult throughout the review.

Self-assessment report

The self-assessment process was coordinated by a steering group composed of ACPUA's Director and three technical staff members, with all other staff contributing throughout the process. The draft of the SAR prepared by the steering group was submitted for comments first to the ACPUA governing

and technical bodies and staff, and subsequently to external stakeholders. Due to the COVID-19 pandemic restrictions introduced in Spain in March 2020, the consultations with internal and external stakeholders could be held online only. The SAR was approved by the agency in July 2020 and the final version was submitted to ENQA and provided to the panel in September 2020.

The SAR contained information on the higher education and quality assurance (QA) system in Aragon, and ACPUA's external quality assurance (EQA) activities and methodologies; sections on its compliance with the ESG, with links to key documents; information on stakeholder involvement; an overview of the 2016 review findings and ACPUA's follow-up action, and of current challenges and areas for future development; and a SWOT analysis. The Annexes provided additional evidence (e.g. the current Strategic Plan; Improvements related to ESG Part 2; a table translating ESG Part 1 standards into ACPUA's evaluation criteria).

The SAR was clear and informative. It provided a good insight into ACPUA's legal framework, goals and activities. Nevertheless, it would have benefitted from a more self-critical approach, and a more in-depth analysis of how ACPUA's activities evolved to integrate the ESG 2015 (adopted shortly before the previous review), including a more explicit mapping of the agency's methodologies for Part 1 of the ESG. It could have also offered more foresight reflection on the future implications of the gradual shift in Spanish EQA from a centralised system of programme accreditation to a more autonomous system of accreditation of an internal QA (IQA) system and subsequent institutional accreditation.

Site visit

In view of the restrictions related to the COVID-19 pandemic, the panel and ACPUA agreed to conduct the site visit in an online format. It was organised in accordance with ENQA's Protocol for online site visits due to force majeure. The programme of the visit (see Annex 1) was prepared jointly by the ACPUA liaison person and the panel. The visit was preceded by online preparatory meetings on 18 November 2020: an internal meeting of the panel, and a meeting with the ACPUA Director and technical staff which, in line with the Protocol for online site visits, aimed not only to discuss the context of the agency's operations but also to collect missing and verify available evidence. The site visit took place between 25 and 27 November 2020. The panel conducted interviews with all key stakeholders, including ACPUA's governing, advisory and technical bodies, the teams responsible for the SAR and internal QA, staff, external reviewers, and representatives of the Aragon regional authorities, reviewed higher education institutions, students and social and business partners. At the end of the visit, the panel had an internal meeting to agree on conclusions from the review and a debriefing for ACPUA on the main findings. The panel was impressed by the excellent organisation of the visit and genuine engagement of all internal and external stakeholders at the meetings. The online format of the visit was not, in any way, detrimental to the panel's ability to find the information and inputs that it required.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The overall legal framework for higher education in Spain is set out in the Constitution of 1978 which grants autonomy to higher education institutions (HEIs) and delegates to the seventeen Autonomous Communities the powers to develop their own policies within a set of basic national regulations. The main national legislative acts are the Organic Laws on Universities of 2001 and 2007 (Laws 6/2001 and 4/2007 respectively) and the Royal Decrees which regulate the organisation and planning of official university education, programmes in arts and doctoral studies. Detailed arrangements are laid down in decrees adopted by the authorities of the Autonomous Communities.

The higher education system in the Autonomous Community of Aragon consists of two universities, seven centres affiliated to the universities and four centres of higher arts education.

Founded in 1542, the University of Zaragoza, a public institution, is one of the oldest, largest and most prestigious universities in Spain. It currently has 33,598 students. The San Jorge University, with 2,361 students, is a private institution established in 2005. Both universities offer Bachelor's and Master's degree and PhD programmes.

The two universities have signed agreements with centres and schools whereby such institutions, referred to as partner HEIs, may provide official degree programmes as affiliated to the university. The University of Zaragoza has five partner HEIs, all situated in Aragon: Escuela Universitaria Politécnica de La Almunia de Doña Godina; Escuela Universitaria de Turismo; Centro Universitario de la Defensa; Escuela Universitaria de Enfermería Hospital General San Jorge; and Escuela Universitaria de Enfermería Hospital General Obispo Polanco. The San Jorge University has agreements with two partner HEIs: ESIC Business and Marketing School in Aragon, and El Centro de Estudios Superiores Universitarios de Galicia in the Autonomous Community of Galicia.

There are three public centres of higher arts education, Escuela Superior de Diseño de Aragón, Escuela de Conservación y Restauración de Bienes Culturales de Aragón and Conservatorio Superior de Música de Aragón, and one private centre, Centro Superior de Diseño Hacer Creativo.

QUALITY ASSURANCE

The 2001 and 2007 Organic Laws on Universities assign evaluation, certification and accreditation responsibilities to the National Agency for Quality Assessment and Accreditation (ANECA) and regional EQA bodies set up by the Autonomous Communities. Royal Decrees 1393/2007 and 420/2015 set a national framework for programme and institutional accreditation, respectively, to ensure a degree of homogeneity and recognition of EQA processes and their outcomes across Spain. Within this framework, the Autonomous Communities enact specific legislation for their EQA bodies.

ANECA has an overall coordination role in Spain and conducts EQA activities as part of its evaluation schemes for HEIs, programmes and academic staff. There are currently ten regional agencies. ANECA and seven regional agencies, including ACPUA, are ENQA members and are listed on EQAR. Where a regional agency is registered on EQAR, it is authorised to carry out the full range of programme and institutional evaluations as provided for in the Royal Decrees. In the other ten regions, ANECA is the only body authorised to conduct EQA activities, except for programme reaccreditation reviews carried out by the three regional agencies that are not listed on EQAR. In addition to nationally regulated schemes, regional agencies establish their own evaluation schemes to address their specific priorities and needs.

The General Conference on University Policy (CGPU) coordinates the overall university policy at the national level and approves the criteria for the coordination of evaluation, certification and accreditation activities. It is composed of representatives of the national Ministry in charge of higher education and the regional Ministers responsible for higher education in the Autonomous Communities. The University Commission for the Regulation of Follow-up and Renewal of Accreditation (CURSA), set up by the CGPU, agrees on guidelines and protocols specifically for the accreditation of degrees. It consists of the Director General of University Policy and representatives of the national Ministry, Directors General of the Autonomous Communities, universities, ANECA and four regional agencies, including ACPUA.

The national and regional authorities have decision-making powers in some EQA processes. Based on ACPUA's evaluation reports, the national Council of Universities, which consists of the Minister responsible for higher education and the Rectors of public and private universities, takes final decisions in initial and periodic programme accreditation and initial institutional accreditation, and the Government of Aragon in HEI initial accreditation and partner HEI evaluation.

The Spanish Network of Higher Education Quality Assurance Agencies (REACU) brings together ANECA and the regional agencies. It aims to foster cooperation and exchange good practices, proposes and develops EQA methodologies and supports the development of QA systems. Despite no official standing, REACU performs an important role in the harmonisation of evaluation criteria across the country as it usually drafts common national evaluation protocols and guidelines which are subsequently approved officially via ANECA, CURSA and the CGPU.

ACPUA

ACPUA was established in 2005 by the Aragon Higher Education Act of 14 June 2005 (Law 5/2005) and started its operations in 2006. It is a public law entity which has legal personality, its own assets and full capacity to act in pursuit of its objectives. The agency's mission is to assure and promote the quality of the Aragon higher education system. It aims to develop useful links between the university, the social-productive areas, the institutional decision-making bodies and the society of Aragon as a whole, and to promote exchange of experience, not only with other national and international university systems but also with other education levels (secondary education, vocational training, etc.).

In its initial phase, 2006-2012, ACPUA focused on conducting prospective studies, supporting HEIs in the development of IQA and monitoring their programmes through follow-up processes. Between 2012 and 2016, the agency expanded its EQA activities, starting with programme accreditation, developed its knowledge-sharing seminars into a forum for regular debates on quality and collaboration with stakeholders, and established international links. This was also a period of changes in ACPUA's structure combined with continued efforts to align its EQA methodologies with the ESG 2005 and, subsequently, the ESG 2015. The agency acquired the status of ENQA affiliate in 2013 and became an ENQA member and was listed on EQAR in 2016. As a result, it was authorised to conduct all programme and institutional evaluation processes established by the national legislation. Since 2017, ACPUA has gradually extended the range of its evaluation schemes and gained recognition among its stakeholders in Aragon. In recent years, it has also provided EQA services in other regions of Spain (Asturias, Cantabria, Catalonia, Galicia, La Rioja, Basque Country) and in Andorra. Except for programme evaluations in Catalonia and Andorra, these are evaluations of research or teaching staff activities.

ACPUA'S ORGANISATION/STRUCTURE

ACPUA's structure consists of governing bodies, an advisory body and technical bodies, which are supported by a team of technical and administrative staff and a pool of external reviewers.

The governing bodies are the Board of Directors and the Director. The **Board of Directors** is the highest body of the agency. It is composed of the Minister of Science, Higher Education and Knowledge Society (Chair), and Directors General for Higher Education and for Research and Innovation; ACPUA Director; members of the ACPUA Committee of Experts; Rectors and other top-level management representatives of the Aragon universities; students appointed by the highest-level student representative bodies of the Aragon universities; and representatives of the main trade unions and business associations. The Board sets out general strategic lines for the agency and approves its strategy, annual plans, budgets and activity and financial reports. The **Director**, the chief executive and head of staff, is responsible for the implementation of strategic plans and reports to the Board on the agency's activities.

The **Committee of Experts**, an advisory body for the Board and the Director, consists of national and international experts, including one from Aragon. It provides information on international higher education developments and advice on the agency's structure and EQA activities and methodologies.

The technical bodies have specific responsibilities in EQA activities. The **Commission of Evaluation, Certification and Accreditation** (CECA) develops, modifies and approves evaluation methodologies

and protocols; sets up technical committees; and selects reviewers for evaluation panels. It is not involved in evaluation processes. It consists of the ACPUA Director and QA experts: national academic and international experts, students (including one from Aragon) and external stakeholders.

The **Programmes Evaluation Committee** (SET) and the **Institutions Evaluation Committee** (SEC) are the technical bodies that decide final evaluation outcomes and produce final evaluation reports in the programme and institutional evaluation processes respectively. SEC also carries out initial institutional accreditation and training school accreditation reviews and teaching staff evaluation system audits. Each Committee consists of national and international academic experts, a student and external stakeholders, all from outside Aragon. The **Research Evaluation Committee** (SEI), composed of researchers external to the Aragon higher education system, decides the final outcomes and produces final reports in the research evaluation processes. There are five **Evaluation Committees by Field of Knowledge and PhD** (CERs), one for each major field (Arts and Humanities; Engineering and Architecture; Basic Sciences; Health Sciences; and Social and Legal Sciences). The Committees by Field of Knowledge are composed of academic experts in each field, students and external stakeholders from outside Aragon. They conduct initial programme accreditation reviews and submit reports to SET which produces final reports. A Doctoral Committee, which is expected to be set up at the beginning of 2021 and include PhD students and international experts, will be involved in initial accreditation and reaccreditation of PhD programmes. The **Follow-up Committee** is responsible for follow-up processes in programme, institutional and research evaluation schemes and submits its reports to SET. It is composed of national academic experts, a student and an external stakeholder from outside Aragon and an international expert.

The **Appeals Committee** oversees proper conduct of evaluation processes and ethics in the agency's activities, and considers appeals and complaints. It consists of experts, including at least two with a legal background and a student, whose main professional or learning activity takes place outside Aragon and who are not members of any other ACPUA body.

The eight **staff** members of the agency are assigned to the administration area and the technical area. Quality technicians are involved in evaluation processes, with no voting rights, as technical secretaries to ensure proper and consistent implementation of the agency's procedures.

External reviewers conduct external evaluations in most processes and submit their reports to the Evaluation Committee which produces final evaluation reports.

ACPUA's FUNCTIONS, ACTIVITIES, PROCEDURES.

ACPUA's activities can be divided into three main strands:

- EQA activities as part of programme, institutional and research evaluation schemes;
- Strategic foresight activities: producing reports and studies to support higher education policy decisions at the request of the Government of Aragon;
- Dissemination or outreach activities promoting quality culture in higher education: regular ACPUA Seminars and other events and initiatives for stakeholders as part of the transversal ACPUA+Society and ACPUA+Students Programmes.

ACPUA is extensively engaged in international activities, which are now part of the transversal ACPUA+International Programme. The agency has been listed on EQAR and a member of ENQA, the International Network for Quality Assurance in Higher Education (INQAAHE) and the European Consortium for Accreditation (ECA) since 2016. It has participated in ENQA, EQAR and other seminars, hosted the 2018 ENQA Members' Forum and contributes on an ongoing basis to the ECA Working Group on Innovation in QA and Accreditation. As part of EQAR's DEQAR project, it hosted a presentation event and publishes its evaluation reports in the Database of External Quality Assurance Results. Through its involvement in the INQAAHE project 'Making connections between the

institutional evaluation and the Sustainable Development Goals', ACPUA was inspired to establish its ALCAEUS evaluation scheme. It is also an associate partner in ongoing EU-funded projects involving Aragon, other Spanish and international universities; for example, the European Universities project 'UNITA' which focuses on joint degrees, and the Campus Iberus project 'Pack Alliance-European alliance for innovation training and collaboration towards future packaging' which supports academia-industry collaboration.

ACPUA's EQA activities

Programme evaluation schemes

Pursuant to the national legislation, all evaluation processes are mandatory for programmes leading to officially recognised Bachelor's and Master's and PhD degrees ('official degrees').

Study programme initial accreditation / ex-ante programme evaluation

New programmes undergo an initial accreditation review to be established. Any subsequent significant modifications in accredited programmes are also subject to approval by the agency. This evaluation scheme comprises initial accreditation of Bachelor's, Master's and PhD degree programmes and Master's programmes in art fields; joint programme review (not yet in place); and study programme modification. The processes in place are desk-based reviews which include an analysis of a HEI's SAR (or a report on changes for the 'modification' process) and end with an evaluation report. Based on ACPUA's reports, final accreditation decisions are taken by the Council of Universities as accredited programmes are entered on the national register of official degrees to be recognised across the country.

Study programme follow-up

During the accreditation cycle, ACPUA monitors proper implementation of programmes based on the approved design and improvements made by HEIs. The process is a desk-based review of a HEI's report, with a site visit undertaken where the positive (re-)accreditation decision was conditional on the submission of an improvement plan. HEIs submit at least one follow-up report in an accreditation cycle; annual reports are required only in the following specific cases: (re-)accreditation conditional on the submission of an improvement plan; significant shortcomings identified through the follow-up process; and for teacher training programmes where student internships are hosted by training schools (see Training school accreditation below). ACPUA takes final decisions in the process, based on its evaluation reports.

Study programme accreditation (programme reaccreditation) / ex-post programme evaluation

Accredited Bachelor's and PhD programmes undergo a reaccreditation review every six years and Master's programmes every four years. A review includes an analysis of a HEI's SAR and a site visit and ends with an evaluation report. Final decisions are taken by the Council of Universities.

ACPUA has carried out so far the following programme evaluations **outside the Aragon higher education system**: an ex-ante evaluation of a Master's degree programme for the Quality Agency AQU Catalunya (2017), and programme evaluations for the Agència de Qualitat de l'Ensenyament Superior d'Andorra (AQUA) (2018, 2019, 2020).

Institutional evaluation schemes

- **Evaluation schemes established by national legislation**

Certification of the implementation of an internal quality assurance system in a university centre / IQAS certification (PACE-SGIC)

This scheme focuses on the functioning of an internal quality assurance system (IQAS). It is a voluntary process, but the IQAS certification is required for university centres to apply for initial institutional accreditation. The process involves an analysis of a centre's SAR and a site visit and ends with an

evaluation report. Final decisions are taken by ACPUA. Certification is valid for five years. Intervals for follow-up reporting during the certification cycles are specified in ACPUA's evaluation reports.

Institutional accreditation (initial institutional accreditation)

The process has been introduced as an alternative to the reaccreditation of official degrees. Where a centre has obtained initial institutional accreditation, the accreditation of all official degrees is renewed without an ex-post evaluation of each programme. A centre may apply for initial institutional accreditation in cases where at least half of its official Bachelor's and Master's degrees have been reaccredited and it has successfully undergone an IQAS certification review. The process is a desk-based review where ACPUA verifies the validity and accuracy of data and documents based on the IQAS certification and programme reaccreditation reviews (review reports, IQAS implementation certificate, a list of registered official degrees, the Rector's statement on programmes currently delivered). Final decisions are taken by the Council of Universities which grants accreditation for five years.

Follow-up accreditation / Institutional follow-up accreditation (follow-up and reaccreditation)

Pursuant to the national legislation, institutional accreditation includes initial accreditation, follow-up and reaccreditation, and the length of an accreditation cycle is five years. Follow-up accreditation, including a follow-up and institutional accreditation renewal, is still at the developmental stage. A national protocol for the processes is expected to be approved at the beginning of 2021. Institutional reaccreditation in Aragon should be launched in 2023 – five years after the first initial accreditation reviews conducted in 2018. Based on the documents available at the time of the review, a reaccreditation review will include a review of a HEI's SAR and a site visit and will end with a report.

HEI initial accreditation

Initial accreditation is required by the Government of Aragon to authorise a university to establish or affiliate a new centre. While affiliated centres have some operational autonomy, the process aims to ensure that new centres comply with the national requirements for university education and affiliation with a university. The process focuses on the teaching offering and human, material and financial resources of a centre. A review is based on a university's SAR and ends with an evaluation report. Final decisions are taken by the Government of Aragon. There is no specific follow-up phase as programmes in accredited centres undergo a cyclical accreditation review.

- **Evaluation schemes based on regional regulations**

Partner HEI evaluation (Viability evaluation)

ACPUA evaluates the viability of centres affiliated to the universities at the request of the Government of Aragon (the last evaluation conducted in 2014). As affiliated centres do not receive basic funding from the Government, their financial viability depends on tuition fees paid by students and contributions from their boards of trustees. An evaluation aims to verify whether a centre meets viability conditions and focuses on the teaching offering and human, material and financial resources. The process includes an analysis of a centre's SAR and site visit and ends with an evaluation report. Final decisions are taken by the Government of Aragon. There is no regular follow-up; the Government requests follow-up reports where necessary.

Training school accreditation

Teacher training programmes provided by the universities comprise a compulsory teaching internship. Students in such Bachelor's and Master's degree programmes carry out internships in infant, primary and secondary education or vocational training centres. Training school accreditation is a voluntary process; applications can be submitted by centres that have hosted internships for at least two years. It is a desk-based review ending with a report, where ACPUA examines a dossier (an application / SAR, follow-up and reaccreditation reports for the university's programmes concerned and other

relevant documents) and focuses on specific aspects such as possible incidents in hosting student internships, student satisfaction rates and possible student complaints. ACPUA takes final decisions and grants accreditation for three years. During the cycle, monitoring is based on follow-up reports for the degree programmes concerned.

Teaching staff evaluation system audit

The process provides the basis for the Government of Aragon to grant additional salary allowances for dedication and performance to teachers at the University of Zaragoza. It aims to ensure that the University's teaching staff evaluation system works properly and in compliance with the criteria laid down in the regional legislation. It involves a review of the University's annual self-evaluation reports and ends with an evaluation report. Final decisions are taken by ACPUA.

- **Evaluation scheme developed in cooperation with ANECA and other Spanish agencies**

DOCENTIA Programme / Teaching activity evaluation system audit

This is a voluntary programme which aims to help universities design and implement a teaching activity evaluation system based on a DOCENTIA model which they can adapt to their specific contexts. Thus, it promotes a key role that universities are expected to play in evaluating teaching activities and developing training plans for their academic staff. It is divided into three phases: (1) Design evaluation: a desk-based review of compliance of the university's system with the model; (2) Follow-up of implementation: a desk-based review of the implementation of the system; and (3) Certification of the system implementation: an evaluation of results after two years of implementation, which includes a site visit. ACPUA produces an evaluation report in each phase and takes final decisions. Certification is valid for five years. During the certification cycle, a university submits four follow-up reports.

- **Evaluation scheme developed by ACPUA**

ALCAEUS Programme / Agenda 2030

ALCAEUS is a voluntary scheme designed to provide visibility to institutions or centres that demonstrate commitment and contribute to the achievement of the UN Sustainable Development Goals (SDGs) / Agenda 2030. It has been inspired by the afore-mentioned INQAAHE project 'Making connections between the institutional evaluation and the Sustainable Development Goals'. The pilot run of the Programme is scheduled for December 2020. ALCAEUS will be open to institutions and centres which have successfully undergone an IQAS certification review. It will be based on a SAR and a site visit and will end with an evaluation report. ACPUA will take final decisions and award a quality label for five years. Institutions will submit annual follow-up reports.

Research evaluation schemes

ACPUA performs evaluations of research conducted by junior academic staff and ex-ante and ex-post evaluations of university research institutes. These processes fall outside the scope of the ESG and thus are not included in the ToR for the present external review.

ACPUA'S FUNDING

ACPUA is funded mainly by the Autonomous Community of Aragon. Its budget is approved annually by the Regional Parliament in the Budget Law of the Autonomous Community of Aragon. Additional sources of income are fees for EQA activities conducted outside the Aragon higher education system and the official evaluation schemes, and project grants. Fees for such EQA activities represent around 4% of the total budgets for the last four years. The agency's total annual budget has increased from €509,503 in 2015 to €753,552 in 2020.

FINDINGS: COMPLIANCE OF ACPUA 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.

2016 review recommendation: The panel recommends to further increase the stakeholder participation in the agency's work, mainly through involving representatives of the labour market and society in evaluation panels and committees, wherever deemed relevant.

Evidence

In its mission, ACPUA aims to assure and promote the quality of the university system in Aragon. In doing so, it seeks to develop useful links between the university, the social-productive areas, the institutional decision-making bodies and the society of Aragon as a whole, and promote the exchange of experience, not only with other national and international university systems but also with other educational levels (secondary education, vocational training, etc.). (SAR; ACPUA website)

The agency's Strategic Plan 2019-2022 (SAR, Annex II) defines strategic lines and annual goals which guide annual activity plans. For the areas of particular relevance to the ESG, the Plan sets the following goals for 2020 within the strategic lines: (1) Institutional accreditation and its impact on QA: promote institutional accreditation; develop teaching staff evaluation programmes; design institutional follow-up and reaccreditation protocols; (2) Continuous improvement in teaching and learning assessment: carry out programme evaluations; (3) Promotion of excellence, strategic evaluations and thematic analyses: conduct graduate labour market insertion studies; promote thematic analyses; (4) Development of the social dimension of quality: develop an evaluation programme for the implementation of Agenda 2030 in higher education; promote equality and respect for sexual diversity; (5) Openness to stakeholders: increase stakeholder involvement in the agency's committees and processes; (6) Internationalisation: increase the agency's participation in international activities and visibility in Spain.

ACPUA's EQA activities include the following processes at programme and institutional or unit levels:
- programme evaluations: initial accreditation; accreditation renewal; follow-up;
- institutional evaluations: IQAS certification; initial and follow-up accreditation; HEI initial accreditation; partner HEI evaluation; training school accreditation; ALCAEUS / Agenda 2030; DOCENTIA / teaching activity evaluation system audit; and teaching staff evaluation system audit.

Joint programme review (as part of programme accreditation), institutional follow-up accreditation and ALCAEUS are not yet fully developed or implemented. The objectives and methodologies of the fully developed processes are defined in ACPUA's protocols. Except for initial accreditation reviews and partner HEI evaluation, the processes are cyclical, with the length of a cycle laid down in the law and / or the agency's protocols. Like other Spanish agencies, ACPUA is now shifting the focus of its EQA activities from programme accreditation, which is to a large extent regulated by the national legislation, to institutional accreditation which gives greater autonomy to centres that have more than

half of their programmes reaccredited and have successfully undergone an IQAS certification. (SAR; Evaluation protocols; Meetings with the Director).

Apart from EQA activities, ACPUA carries out strategic foresight activities, producing reports and studies for the Government of Aragon, and outreach activities, including, in particular, regular seminars on higher education and QA topics for HEIs and other stakeholders, and dialogue meetings with heads of HEIs to discuss their needs and obtain feedback on its activities. (SAR; ACPUA website) As the Director clarified for the panel, the agency does not provide any consultancy services; it supports the Government of Aragon in policy development by producing foresight studies. It does not charge fees for such studies; the costs are covered by the agency's regular budget.

Following the 2016 review recommendation, ACPUA has increased stakeholder involvement in its bodies and EQA activities. Currently, the regional authorities and the Aragon universities have their high-level representatives on the governing body that approves the agency's strategy and annual plans, budgets and reports. An academic and QA expert representing the Aragon universities is a member of the advisory body. National academic and QA experts from outside Aragon sit on the advisory body, all of the technical bodies (responsible for EQA activities) and review panels. International experts are members of the advisory body, the technical bodies, and all programme reaccreditation review panels since 2020. Students of the Aragon universities are represented on the governing body and the technical body in charge of EQA methodologies; non-Aragon students are members of the technical bodies and review panels. Social and business partners have representatives on the governing and technical bodies and review panels. (SAR; Evaluation protocols)

ACPUA has three transversal programmes designed to ensure active participation of stakeholders. As part of the ACPUA+Society Programme, which aims specifically at engagement with external stakeholders, ACPUA organises the above-mentioned regular seminars and dialogue meetings. In 2021, the agency will also have regular meetings with business partners to discuss labour market and graduate employability issues. Under the ACPUA+Students Programme, the agency carries out communication and training activities to promote student involvement in QA. The ACPUA+International Programme provides a framework for international initiatives, and for more extensive involvement of international experts in the agency's bodies and EQA activities in recent years. (SAR; ACPUA website; Pre-visit meeting)

As the panel learned from ACPUA's Director and members of its technical bodies, inputs from the stakeholders are particularly valuable in shifting the focus from an excessively formalistic approach towards more substantive issues such as learning outcomes and labour market needs. The involvement of international experts brings a new perspective in designing and conducting evaluation processes.

All of the stakeholders whom the panel met emphasised closeness to the agency, its responsiveness to their suggestions, providing examples of how they contributed to its activities, and the impact of its activities on quality enhancement in the Aragon higher education system. For the Regional Parliament and Government, ACPUA also has a key role in translating policy priorities, such as a student-centred perspective and the social dimension, including SDGs, and in promoting the region within Spain. Representatives of the Aragon HEIs welcome the agency's move towards institutional accreditation as a process which helps them develop a holistic approach to education and IQA, going beyond individual programmes and engaging all stakeholders. The students interviewed feel fully engaged and treated as equal partners in both the governance and EQA activities of the agency. The social and business partners value highly ACPUA's engagement with social issues and its efforts to develop activities which link universities and the business world and enhance the social dimension of higher education.

Analysis

The panel confirms that ACPUA's mission and the protocols which define the objectives of evaluation processes are published on its website. The mission makes it clear that the agency seeks to combine the accountability and quality enhancement dimensions in its EQA activities. The evaluation processes are a

mix, some clearly focusing on compliance with threshold requirements, and others aiming to address both EQA dimensions or focusing on enhancement. Regardless of their specific objectives, as the panel found in the discussions with stakeholders, there is unanimous agreement that the agency's activities have contributed greatly to both the accountability and quality enhancement of higher education in Aragon. There is also strong support in HEIs for the shift from a centralised and dirigiste system of programme accreditation towards a more autonomous system of institutional accreditation.

The objectives and methodologies of most processes are largely predefined by the national legislation and adapted by the agency to the regional priorities and needs. However, the panel's discussions demonstrate that they are fully endorsed by all ACPUA stakeholders. The consensus reflects the agency's consistent efforts to seek inputs from its stakeholders in the development and improvement of its evaluation processes. It is also facilitated by the fact that ACPUA, the Aragon Government and universities have their representatives in the national bodies that contribute to or approve the national framework for QA (see 'Introduction').

It is evident to the panel that ACPUA conducts its EQA activities on a regular basis. Overall, they are also designed and carried out in compliance with Part 2 of the ESG. The panel sees, however, room for improvement in how ACPUA's evaluation methodologies address student-centred learning, teaching and assessment (ESG 2.1), and in reporting in some evaluation processes (ESG 2.6). Since the panel is expected to evaluate only what is in place, its conclusions under ESG 2.1, 2.2 and 2.3. do not take into consideration the three evaluation processes that have not yet been fully developed or implemented.

The panel fully agrees with ACPUA that the ALCAEUS Programme, which aims to raise the visibility of HEIs or centres that carry forward the SDGs, should be widely promoted in Spain and beyond. This is a pioneering scheme designed to enhance the social dimension of higher education, and a flagship example of how the agency responds to the interests and needs of its stakeholders.

It is clear to the panel from the documents examined, including the Strategic Plan, and the discussions with stakeholders, that ACPUA carries forward its EQA objectives into its daily work not only through its evaluation processes but also through outreach and development activities. In the stakeholders' view, outreach activities and thematic analyses add much value in supporting quality enhancement.

Agencies are expected to make a clear distinction between EQA and other fields of activity. Based on all the evidence collected, the panel confirms that ACPUA does not provide consultancy services. Its EQA, outreach and strategic foresight activities are clearly separated on its website. While the agency makes use of findings from its EQA processes in its outreach and strategic foresight activities, the Director and staff involved in such activities have no influence on findings or outcomes of evaluation processes.

The agency has made great efforts following the 2016 review to widen the involvement of professional and social partners who are now represented on its governing, advisory and technical bodies and review panels, and contribute extensively to its activities through the outreach programmes. The 2016 review panel commended ACPUA for the involvement of students; since then, the agency has engaged even more extensively with students and continues to make them feel important in its EQA and outreach activities. As the Aragon higher education system is small and ACPUA takes care to safeguard its independence, regional stakeholders have representatives on its governing and advisory bodies and the technical body responsible for EQA methodologies, but they have no role in evaluation processes. This arrangement, as the panel found in the interviews, is fully accepted by all stakeholders who have plenty of opportunities to contribute to the agency's work through its outreach programmes. All relevant groups, including academic staff, students and external stakeholders, are well represented through their membership of the ACPUA bodies and review panels who come from outside Aragon. The panel also notes the extensive involvement of international experts who have joined the agency's governing, advisory and technical bodies and review panels since 2016.

It is clear to the panel from the examples given by the stakeholders that all of them have a tangible impact on the agency's activities, contributing to its Strategic Plan, the design of new evaluation processes and the improvement of those already in place. The panel was impressed by the engagement of the stakeholders and their commitment to pursue jointly the agency's mission.

Panel commendations

The panel commends ACPUA for developing ALCAEUS as a pioneering evaluation scheme focused on the UN Sustainable Development Goals, which aims to enhance the social dimension of higher education in Aragon.

The panel commends ACPUA for ensuring extensive and meaningful involvement of all stakeholders, including students and professional and social partners, as well as international experts, in its governance and external quality assurance processes.

Panel conclusion: fully 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

The 2001 and 2007 Organic Laws on Universities assign QA responsibilities to ANECA and evaluation bodies set up by the Autonomous Communities. ACPUA was established by the Aragon Higher Education Act of 14 June 2005 (Law 5/2005) as a public law entity with legal personality and its own assets. The Act defines the aims and functions of the agency as the EQA body and lays down its basic organisational and operational arrangements. It also states that ACPUA may provide QA services to the other Autonomous Communities and HEIs outside the Aragon higher education system and Spain. The main source of the agency's funding is the budget approved by the Regional Parliament.

Pursuant to the national legislation, ACPUA's evaluations are recognised in the entire territory of Spain. The Council of Universities (a national-level body composed of the Minister responsible for higher education and the Rectors of universities) and the Government of Aragon take final decisions in some of ACPUA's EQA processes based on its evaluation reports (initial and periodic programme accreditation, initial institutional accreditation, HEI initial accreditation and partner HEI evaluation). The Government also grants salary allowances to teaching staff of the University of Zaragoza based on the outcomes of ACPUA's teaching staff evaluation system audits. To conduct programme evaluations in Andorra (see section 'ACPUA'), ACPUA signed an agreement with the Agència de Qualitat de l'Ensenyament Superior d'Andorra (AQUA). (Legislation; Agreement between ACPUA and AQUA; SAR)

Analysis

It is evident to the panel that ACPUA has a clear legal basis for its EQA activities both within and outside the Autonomous Community of Aragon and the outcomes of its evaluations are fully recognised by the national and regional authorities. Furthermore, the panel's interviews during the site visit demonstrate that ACPUA is well recognised for its work by the government, political actors, HEIs and other stakeholders in Aragon. It is clear that the agency is seen as being a key player in delivering on the vision of embedding the SDGs within the university system of Aragon and its study programmes.

ACPUA's evaluations conducted outside Spain in the past few years were duly underpinned by a formal agreement with the competent body which ensured the recognition of their outcomes in the country where the services were provided.

Panel conclusion: fully compliant

ESG 3.3 Independence

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

Evidence

The Aragon Higher Education Act (Law 5/2005) states that ACPUA shall conduct its activities with organic and functional independence. In performance of its functions, it must guarantee the objectivity of the methods and procedures it uses, and the impartiality of its governing and administration bodies.

ACPUA is a public law entity with legal personality and its own assets. It is funded mainly by the Government of Aragon, with roughly 96% of its funding coming from the budget approved by the Regional Parliament. (Legislation; SAR) As the Director and representatives of the Ministry of Science, Higher Education and Knowledge Society explained to the panel, the agency has full power to allocate funding within the approved total budget, hire permanent and temporary staff and conclude outsourcing contracts. As a public law entity, ACPUA is required, however, to follow complex procedures in hiring technical staff and concluding outsourcing contracts. The Ministry is working with the competent government department to amend the law and ease the burden of the procedures.

As explained in the SAR, ACPUA's structure is designed so as to separate responsibilities and decision-making powers in governance and EQA processes. The Board of Directors, a governing body, approves the agency's strategy, annual plans, budgets and reports. It is composed of three representatives of the Government of Aragon, including the Minister as the Chair; ACPUA Director; two experts who are members of the ACPUA Committee of Experts; five top-level management and two student representatives of the two Aragon universities; and two trade union and two business association representatives. Pursuant to the legislation, except for the representatives of the ACPUA Committee of Experts who are appointed by the Minister, all members sit on the Board on an ex-officio basis. The Director, a corporate sole (or a governing body as described in ACPUA's documents), is the chief executive, responsible for the implementation of strategic plans and reporting to the Board. (S)he is appointed by the Government of Aragon, on the recommendation of the Minister, for a four-year term which may be extended once. The Committee of Experts advises the governing bodies on the agency's activities and methodologies. It consists of two Spanish QA experts, including at least one from outside Aragon, and two international QA experts, appointed by the Chair of the Board on the recommendation of the Director who consults the Board.

QA activities are the responsibility of the technical bodies. CECA develops and approves evaluation methodologies, selects reviewers for panels and appoints members of the Evaluation Committees, but is not involved in evaluation processes. The membership consists of the Director and national and international QA experts, students and external stakeholders (currently, one member from Aragon), appointed by the Director on the recommendation of the Committee of Experts. The Evaluation Committees, which decide evaluation outcomes and produce final evaluation reports based on panel reports, are composed of academic experts, students and external stakeholders, all coming from outside Aragon and including international experts. Members of the Appeals Committee are experts whose main professional activity takes place outside Aragon and who do not sit on any other ACPUA body.

Pursuant to the Aragon Higher Education Act, ACPUA independently establishes procedures and criteria for its QA processes within the general framework set by the national and regional legislation and appoints members of its Evaluation Committees and external reviewers. In accordance with ACPUA's Reviewer Selection Procedure, reviewers involved in evaluation processes within Aragon must come from outside the Autonomous Community. Candidates for review panels are pre-selected by technical staff, selected by CECA and formally appointed by the Director.

Evaluation decisions are taken by the Evaluation Committees. The Aragon Higher Education Act states that the Committees shall act fully independently, and the outcomes of their actions cannot be modified by any other body of the agency.

In accordance with the Act, the agency's collaborators and evaluators and individuals working for the agency must observe the Code of Ethics. As stated in the SAR and confirmed in the panel's interviews, the Code is now signed by members of all ACPUA bodies, its staff and external reviewers. As the panel learned from the Appeals Committee, there has been no case of a breach of the Code as yet.

The Board of Directors emphasised that their role is limited to overall governance. Funding for ACPUA comes from the Government, but it has increased over the years regardless of the political party in power. Members of the Evaluation Committees explained that while the agency provides administrative support to them, they have the exclusive competence to examine findings from evaluations, decide their outcomes and produce final reports. The Committees modify reports submitted by review panels only to make them more concise and consistent in terms of the application of the criteria and the use of terminology, while keeping their substantive content. If they have any doubts, they refer back to panels to check if the new wording captures the original intent.

Analysis

Organisational independence

The legislation explicitly guarantees ACPUA's independence and requires it to put in place arrangements safeguarding its independence. The panel also notes that members of all ACPUA bodies and staff sign the Code of Ethics. The Code clearly defines a conflict of interest and requires that those who sign it adhere to the principles of independence and integrity and abstain from participation in processes and decisions which give rise to a conflict of interest.

The agency relies heavily on government funding. However, considering the consensus among the political parties in the Regional Parliament over the steady increase in ACPUA's budget, the panel does not see any likelihood in the regional authorities using funding as leverage. Furthermore, the agency is free to decide how this funding is allocated to perform its statutory duties. Within the total budget allocated, it also hires staff without approval needed from any other body. As the cumbersome procedures for public law entities put some constraints on ACPUA's operational efficiency, the panel was glad to hear about the efforts of the Ministry to address this issue.

While the Minister acts as the Chair of the Board of Directors and the Board also includes other Government officials, they are far outnumbered by members representative of the universities and social and business partners. Furthermore, the Minister has no real power in appointing members (except two who represent the agency's Committee of Experts) as the legislation explicitly specifies their functions or positions (e.g. ACPUA Director, the Rectors, top-level managers holding specific functions and students chosen by the highest-level student representative bodies in the two universities).

ACPUA's independence is further guaranteed by the clear separation in its structure between the governing bodies (the Board of Directors containing the political actors and the representatives of the Aragon universities, and the Director) and the technical bodies responsible for EQA (CECA and Evaluation Committees). While the Director chairs CECA, this body is responsible only for evaluation methodologies and has no role in evaluation processes. As the Aragon higher education system is very small, the agency's ground rule that most of CECA members (except the Director) and all members of the Evaluation Committees, which are involved in evaluation processes, come from outside Aragon is essential to ensuring their independence from both the regional authorities and the universities.

Operational independence

The procedures for ACPUA's evaluation processes are to a large extent prescribed by legislation. In practice, however, the agency contributes to the national QA framework as a member of REACU which drafts evaluation protocols subsequently approved by the competent bodies. Within the national framework, ACPUA's independence in developing detailed procedures and criteria is effectively ensured by the regional legislation and its internal structure and regulations where the exclusive responsibility for evaluation methodologies is assigned to CECA.

The responsibility for evaluation processes is shared between reviewers, who conduct evaluations as part of most of the processes and submit reports to the Evaluation Committees, and the Committees which conduct evaluations in some processes on their own (see ESG 2.3) and produce final evaluation reports in all processes. As indicated above, the Committees enjoy full autonomy thanks to the separation of the responsibilities within the agency's structure and their members coming from outside Aragon. The procedure for the appointment of reviewers, involving technical staff, CECA and finally the Director who only formally signs decisions (as required in public law entities), leaves no room for interference from a third party; the law provides further guarantees of ACPUA's autonomy in this respect. The independence of reviewers in performing their duties in Aragon is well safeguarded by the agency's requirement that all evaluators must be external to the higher education system. Finally, all the parties involved in the operation of the agency's procedures sign the Code of Ethics.

The Director, a CECA member, and technical staff who preselect candidates for reviewers, are also involved in ACPUA's outreach and / or foresight activities, but the panel does not see how this could have any bearing on the agency's operational independence.

Independence of formal outcomes

The Evaluation Committees as the decision-making bodies are well protected against potential internal and external interference by the explicit provision in the law about their exclusive powers, the separation of the responsibilities in the agency, and the inclusion of only non-Aragon experts as their members. This is further reinforced by the two-step procedure where evaluation findings are examined first by review panels in their initial reports and subsequently by the Committee in their final reports. It is also clear to the panel from the discussions that the Committees respect the integrity of evaluations conducted by review panels as their 'interventions' do not change the substance of panel reports.

The panel recognises that the higher education system in Aragon is small. However, in all its discussions, the participants were keen to stress the independent nature of the agency and the non-interference with the decision-making processes. The university representatives stressed the close working relationship between the universities and the agency, which contributes to quality assurance and improvement, but were keen to stress the importance of the external independent examinations conducted by the agency through its procedures.

Panel conclusion: fully 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.

2016 review recommendation: The panel encourages the agency to sustain its efforts for different thematic analysis and to allocate resources to these activities as these may contribute to enhance the relevance and legitimacy of its role in promoting awareness and informed policies about quality assurance.

Evidence

The SAR describes the following activities undertaken by ACPUA and studies and reports, drawing on its evaluation findings, which it has produced or to which it has contributed:

- Seminars on QA and topics of particular interest to stakeholders (e.g. labour market insertion, internationalisation);
- regular activity reports and annual ANECA reports on external quality assurance in Spain;
- reports on findings from accreditation reviews;
- regular technical reports on specific aspects of the Aragon higher education system, requested by the Government of Aragon (e.g. a study on graduate employability);
- technical reports for the official university education planning in Aragon which the agency produces as a member of the Commission for Monitoring University Programming in Aragon (e.g. an analysis of low-demand degree programmes);
- comparative analyses on specific topics, based on evaluations conducted by the Spanish agencies.

Topics of thematic analyses are chosen by ACPUA, suggested by its stakeholders or agreed within REACU where relevant to evaluation processes across the country. (Meetings with the Director, staff and stakeholders) The REACU agencies have recently agreed to address specific topics in their joint thematic analyses (e.g. results of the first programme reaccreditation round, with special regard to teaching staff, learning outcomes and / or resources; IQAS; public information and transparency; and sustainability of specific programmes) (SAR).

Following the 2016 recommendation, ACPUA has increased the funding allocated to 'Studies and technical work' in its budget (€34,100 in 2015; €100,000 in 2019). Thematic analyses are now included in ACPUA's Strategic Plan 2019-2022 (SAR, Annex II). Work is in progress on analyses based on programme evaluations, that address: cross-cutting competencies related to sustainability and SDG; good practices in teaching; connection between evaluation results and the university rankings; comparison of results between similar programmes in Aragon; and PhD programmes. Analyses have been developed by technical staff or external experts. A new technician hired recently is expected to enable the agency to enhance its performance under ESG 3.4. The agency is now looking for a foresight research training course for the newcomer. (SAR; Meeting with staff)

As the panel learned from the Heads of evaluated HEIs, ACPUA's reports inspire teaching and governance innovations and ideas for internal seminars, provide guidelines to streamline an IQAS and develop new tools (e.g. for graduate career tracking), and help centres to prepare for accreditation reviews.

Analysis

ACPUA has put a lot of work and emphasis in the seminar programmes that it runs for the benefit of stakeholders and has worked on useful exercises such as the study on labour market insertion of graduates, the analysis of low-demand programmes and reports on findings from programme accreditation reviews. Clearly, in choosing the topics for analysis, the agency caters to the diverse interests and needs of all stakeholder groups. There is also a commitment in the agency to develop its research function, as evidenced by the inclusion of thematic analyses in its Strategic Plan, the increase in funding for such activities and the new staff member hired.

The panel reviewed a number of thematic reports, translated into English by the agency for this review (see the list in Annex 4). Some of them provide a good insight into ACPUA's EQA activities and clearly identify areas for improvement in its methodologies (e.g. structure of documents, review schedules, training sessions). Other reports contain useful data, for example, on student enrolment in individual programmes, which feeds into regional university planning. In its programme accreditation reports, ACPUA has provided statistical data on its reviews and collected from its evaluation reports examples of good practices and areas for improvement in individual programmes and institutions. These address

a wide range of areas from teaching to strategic management, societal engagement and internationalisation. The panel agrees with the Heads of HEIs that such reports are useful in guiding improvements in institutional policy and practice. The panel feels, however, that a more systematic and deeper approach to analysing the outputs of EQA processes and the subsequent publication of the findings of such analyses would be very helpful for the higher education system and its stakeholders. ACPUA has also gathered sufficient material in its evaluation processes to take its research to the next level and invest effort in reports which discuss general findings and identify trends at the system level. Such thematic analyses could be developed in cooperation with other agencies through REACU and could focus on the topics that have been agreed by the agencies.

In this context, a research training course for the new staff member will indeed be very helpful. Where the agency needs support for deeper and / or system-level analyses, such work could be outsourced or commissioned to external experts, as has already been the case for some studies.

The panel confirms that thematic reports are published on the ACPUA website. As the panel found in the discussions, they are also widely promoted through seminars and other outreach activities.

Panel recommendations

The panel recommends that ACPUA develop a more systematic and deeper approach to the analysis of findings from its evaluation processes, and expand its research activities to provide reports that discuss trends and developments at the level of the Aragon higher education system.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

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

2016 review recommendation: The panel recommends that ACPUA reflects about the necessary resources in the light of longer-term achievement of strategic goals and the expansion of activities. Hence, the panel recommends that the agency tries to anticipate the impact of those activities on staff, not only in terms of staffing levels but also with regard to the need for staff development and training in order to manage transition effectively. Also in relation to resources, the panel recommends that ACPUA considers the impact of the achievement of strategic goals on current activities and processes to ensure that it can adapt to work with possibly a larger number of stakeholders and also to the requirements of systems outside Aragon and Spain.

Evidence

The main source of funding for ACPUA is the budget approved annually by the Regional Parliament. Other sources include fees for EQA services provided outside the Aragon higher education system and the nationally regulated evaluation schemes (around 4% of the total budgets in the last four years), and project grants. ACPUA's annual budget has grown by 48% from €509,503 in 2015 to €753,552 in 2020. Since ACPUA's staff are on the official List of Jobs, the personnel component of the budget is guaranteed by law. The amount allocated by the agency to 'Studies and technical work', including thematic analyses, has nearly tripled recently to reach €100,00 now. (SAR) As the panel learned from the SAR and the stakeholders, the budget has always been approved unanimously by the Parliament, and there is a broad political consensus on no reduction, or even an increase if possible, in funding for the agency as part of the overall science and higher education budget. The Board of Directors and the Ministry of Science, Higher Education and Knowledge Society agree that a 4-year funding system would help ACPUA in strategic planning, and work is underway in the Ministry to amend the law to facilitate this.

Since 2017, ACPUA has conducted several evaluations at the request of institutions outside Aragon (Spanish regions and Andorra) and the schemes established by the legislation. In such cases, the agency can pursue a private pricing policy, but pursuant to the national law, some evaluation processes within Spain can be conducted by ANECA only. (Legislation, SAR; Meetings with the Director)

ACPUA has eight staff members: a secretary, a technical coordinator, three quality technicians, the head of administration and two administrative assistants. Two new staff members have been hired since 2017. (SAR) As the panel learned from staff, all technical staff have work experience in the education sector or relevant areas (QA, human resources). Technical staff are involved as non-voting secretaries in evaluation panels, and staff also do most of the work for the thematic analyses. All staff find the work enriching; while each of them has specific tasks, they work in a transversal way, which builds a good team spirit and gives them an overall view of the agency's activities. As the workload was heavy in the agency's formative years, the newcomers have made a greater difference to the team. Each year, 2% of the personnel budget is allocated to staff development. Where needed, staff take external courses (around 20 such interventions have taken place between 2016 and 2019), some follow a degree course in university quality management, but they also emphasised the value of internal mentoring, attending ENQA seminars and ACPUA outreach events, job shadowing in other Spanish agencies, and peer learning via tools such as the REACU chatroom.

ACPUA has its own office, including the Director's office, a single room for staff and a meeting room with ICT equipment, and free-of-charge access to meeting rooms in the building where the agency is located.

Analysis

The panel notes the increased resources allocated to the agency over the past number of years and the commitment given by the representatives of the Ministry and the Parliament that its budget cannot be reduced. Although a multiannual funding system is not yet in place, the panel considers that the political consensus over the level of funding provides a solid basis for ACPUA to devise long-term plans, with the confidence that it will be well provided for to carry forward its strategic goals. It is also clear from the recent significant increase in the amount for studies and technical work that the budget provides space for both regular EQA activities and development work.

There is little diversification in ACPUA's funding sources. However, the contracts for 'external' services that it has carried out so far are quite an achievement for a small agency, and in view of the legal constraints for such services in Spain. Additionally, ACPUA may consider exploring EU funding opportunities for transnational projects, not only with the Aragon universities as is the case now, but also with other Spanish and international QA agencies.

The panel notes that the agency's team is small but that the higher education system is also small. In the panel's view, thanks to the sharing of tasks and efficient use of staff time, the team is able to perform effectively their technical and administrative duties and engage in development work such as thematic analyses. The staff workload is also likely to decrease gradually as the agency moves away from extensive EQA activities at programme level towards institutional accreditation. Furthermore, as explained earlier, ACPUA can and does hire temporary staff and can outsource contracts for specific tasks, including thematic analyses.

The panel notes that the professionalism and commitment of staff was commented on favourably by all of the stakeholders interviewed. The effort that the agency invests in staff development is commendable, and various internal and external training opportunities are appreciated by the team.

Overall, the panel considers that both the human and financial resources available are sufficient for ACPUA to carry out its EQA activities and expand its development activities as recommended under

ESG 3.4. Since there are also some prospects for more funding in the coming years, any further financial resources could be allocated to the commission of further development work.

Panel commendations

The panel commends ACPUA for the professionalism of its staff and their passionate commitment to work which is highly valued by its stakeholders.

The panel commends ACPUA for the significant increase in the funding allocated to development work.

Panel suggestions for further improvement

The panel suggests that ACPUA allocate any possible further financial resources in the coming years to the commission of further development work. The agency may also consider applying for EU project grants for its development work in collaboration with other national and international agencies.

Panel conclusion: fully 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.

2016 review recommendation: The panel recommends that ACPUA strengthens its collaboration with other agencies to consolidate its achievements and to foster a continuous awareness about possible limitations, areas of improvements, and necessary changes.

Evidence.

ACPUA's 'Values' statement highlights its commitment to high-quality work, the principles of independence, objectivity, social responsibility and transparency in its work and relations with the stakeholders, and teamwork based on respect and cooperation. The agency has established an IQA system in line with ISO 9001. Detailed arrangements are laid down in internal regulations and in documents such as Process Map, Quality Manual and Staff Training Plan. The IQA Committee, composed of the Director, staff member responsible for quality management and area managers, reviews processes and indicators on a quarterly basis and the IQA system on an annual basis, using evidence collected through the mechanisms in place to make improvements. (SAR)

ACPUA conducts a meta-evaluation after each EQA review to collect feedback on the process and its impact. It is based mainly on surveys among those involved in a review in the evaluated institution and review panel members. The Evaluation Committees and staff involved in evaluations as technical secretaries, also assess the performance of reviewers against specific criteria (teamwork skills, observance of deadlines, technical competence and quality of deliverables). Each year ACPUA carries out satisfaction surveys among management teams of the reviewed centres, coordinators of reviewed programmes and reviewers. Findings are communicated to CECA and the IQA Committee to make improvements where necessary. (SAR; Meetings with the stakeholders involved)

ACPUA has periodic focus group meetings with management teams and QA officers of HEIs which centre on how its processes can be made more effective and achieve greater impact. Various other regular meetings are held between the agency and HEIs to discuss its evaluation processes, recently focusing on IQAS certification, institutional accreditation and ALCAEUS. (SAR; Meetings with the stakeholders)

The representatives of all stakeholders whom the panel met were unanimous in praising ACPUA for its readiness to take their suggestions on board. In response to their feedback, the agency, for example,

revamped its draft Strategic Plan, put equality and gender issues higher on its agenda, made various improvements in its evaluation methodologies (see ESG 2.2) and will soon set up a PhD Evaluation Committee within its structure to address better the specificity of PhD programmes.

Findings from meta-evaluations are reported to CECA but it does not receive feedback on the performance of individual panels or reviewers whom it has selected. Reviewers do not receive, and would appreciate, direct feedback on their performance. While they see, after some time, how the agency has amended its evaluation protocols, they would be happy to get more immediate feedback on the suggestions they make in meta-evaluations. (Meetings with CECA members and reviewers)

The agency's management and staff have regular meetings to collect internal feedback and reflect on enhancement actions. Staff communicate with the Director on a daily basis. Their performance is assessed through indicators set for the IQAS, and, in the case of technicians, by the Evaluation Committees against the same criteria as for reviewers. (SAR; Meetings with the SAR Group and IQA Committee, and staff).

As confirmed in the panel's meetings, members of all ACPUA bodies and all staff and reviewers sign the Code of Ethics. Compliance with the Code is monitored by the Appeals Committee. There has been no reported breach of the Code, and ACPUA does not have in place a procedure for dealing with such possible cases. However, a breach of the Code principles would have serious consequences as stipulated in the Administrative Procedure Act (SAR; Meeting with the Appeals Committee).

The Code of Ethics highlights the principles of tolerance, non-discrimination and respect for diversity. In collaboration with the University of Zaragoza, ACPUA is now developing its Equality Plan and gender-related indicators which can be integrated into its evaluation protocols. Since 2018, the agency's annual reports have included a section on gender balance; the data collected has helped to achieve a better gender balance in the agency's Committees and review panels. (SAR)

Following the 2016 review recommendation, ACPUA has had regular meetings with REACU agencies to discuss evaluation methodologies, has signed agreements with them for joint student training and exchange of reviewers, and has been involved in study visits and joint events with international agencies. Student reviewers from outside Aragon working for ACPUA attend training courses offered by the Student Council of the University of Zaragoza, (SAR; Meetings with reviewers and students)

ACPUA does not sub-contract any of its EQA activities within the scope of the ESG to third parties.

Analysis

The policy and procedural documents underpinning the IQAS clearly define ACPUA's quality standards and the processes and procedures in place to achieve them. The panel confirms that the values statement and the documents are published on the agency's website. Overall, the responsibilities within the IQA system are clearly distributed, the processes and procedures are regularly reviewed, and there is evidence that the agency acts upon the feedback collected. The effectiveness of the IQA is not, however, fully reflected in the agency's SAR which, as the panel noted in the introductory section of the report, would have benefited from a more self-critical and analytical approach.

ACPUA has in place a mix of complementary, formal and less formal, mechanisms for gathering regularly external feedback which are fully satisfactory to its stakeholders. The examples given by the stakeholders demonstrate that the agency acts upon their feedback in improving its strategic plans, organisational structure and EQA activities. Internally, feedback from staff is collected in a less formal way. However, the panel would not see any added value in introducing a formal mechanism such as a survey as the agency is small, works in a spirit of collegiality and the staff interviewed seemed to feel entirely free to express their views and suggest possible improvements on an ongoing basis.

The panel considers, however, that further work needs to be done to improve the internal and external feedback mechanisms. It would be useful to close the feedback loop to review panel members on their performance, and on the impact of their recommendations and how they have been incorporated into the higher education system in the region. There is also a gap in the feedback loop between the bodies responsible for the selection of reviewers and the assessment of their performance.

The panel notes that ACPUA reviews aggregate data and other findings from its meta-evaluations to improve its evaluation processes and publishes such meta-analyses on its website, along with information on some actions undertaken as a result of such analyses. However, the panel believes that a more systematic and in-depth analysis of aggregate findings, including those from satisfaction surveys, could be undertaken and could also feed into the agency's thematic analyses.

The panel found that the agency acts in a very professional manner in all its activities. It has a sound procedure for the selection of reviewers and provides them with adequate training (see ESG 2.4). The self-introductions in the meetings indicate that ACPUA has appointed individuals with impressive academic or professional achievements as members of its bodies and review panels. As noted under ESG 3.5, staff have relevant previous work experience and continuously enhance their skills. The panel also notes that a mechanism is in place for performance appraisal of staff and reviewers (though this could still be improved by closing the feedback loop, as indicated above). The Code of Ethics, signed by members of all bodies, staff and reviewers, clearly defines a conflict-of-interest, and the values and principles of professionalism and integrity that they are expected to adhere to in their work. The panel has found no evidence of ethical issues that ACPUA should (have) address(ed). However, it notes that no procedure to do so is in place, and the Code is not very explicit about possible consequences of a breach of its principles. While this is dealt with by the legislation, the Appeals Committee would need specific guidelines on how it should proceed in such cases.

ACPUA has made commendable steps to incorporate the principles of tolerance, non-discrimination, equality and gender balance into its policy and activities. The panel agrees with ACPUA that gender-related indicators can be usefully integrated into its evaluation schemes.

The panel notes that ACPUA has engaged extensively in collaboration with other agencies to carry out the 2016 review recommendation. This has allowed the agency to recruit some competent and experienced academic experts and to benefit from enhanced expertise of well-trained student experts.

Panel commendations

The panel commends ACPUA for its responsiveness to the feedback collected from stakeholders in a continuous effort to enhance its policies, structures and procedures.

The panel commends ACPUA for its efforts to ensure that the principles of tolerance, non-discrimination, equality and gender balance feature prominently in its policy and practice.

Panel recommendations

The panel recommends that ACPUA bridge the gaps in its internal quality assurance system by closing the feedback loops between its evaluation bodies and reviewers, and by putting in place a procedure to deal with breaches of its Code of Ethics that might occur in the future.

Panel suggestions for further improvement

The panel encourages ACPUA to consider the value and feasibility of publishing periodically more systematic and deeper analyses of the overall findings from its meta-evaluations and satisfaction surveys.

Panel conclusion: substantially 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

The Aragon Higher Education Act stipulates that periodically, and at least every five years, ACPUA's activities must be subject to an external review conducted by an international committee of experts. As explained in the SAR, this provision was incorporated into the Act on the agency's initiative. Pursuant to Royal Decrees 1393/2007 and 420/2015, only QA agencies which are listed on EQAR are authorised to conduct a full range of evaluation processes established by the national legislation.

The present review is the second ENQA-coordinated review of the agency. In 2018, ACPUA hosted an ENQA Progress Visit. As emphasised in the SAR, discussions with all stakeholders during the visit inspired continuous self-reflection and guided the agency in taking enhancement measures in the last two years.

Analysis

The requirement for ACPUA to undergo an external review at least every five years is explicitly laid down in the regional legislation. It is also clear to the panel that ACPUA is strongly motivated to undergo an ESG-compliance review by the national legislation where listing on EQAR is a pre-condition for a regional agency to conduct a full range of programme and institutional evaluations. Accordingly, the agency has initiated the present review to renew its ENQA membership and listing on EQAR. ACPUA's commitment to the principles underlying the ESG is further demonstrated by the action it has taken as a follow-up to the 2016 review as discussed in this report, explicit references to the ESG in its internal regulations, as well as its active participation in ENQA and EQAR activities.

Panel conclusion: fully 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 1 of the ESG.

2016 review recommendation: The panel recommends that ACPUA continues to work with the university system to further develop the relationship between standard 2.1 and the development of effective internal quality assurance processes at institutional level. Among the possible areas for further attention, the panel would highlight the following ones: Further strengthen the coherence of different evaluation procedures. More schools and educational centres should be encouraged to strengthen their internal quality systems through external reviews such as the Audit[1]. More attention should be given to a student-centred learning and assessment practices.

Evidence

This review addresses ACPUA's 12 programme and institutional or unit-level evaluation processes. However, methodologies, including criteria, for institutional follow-up (follow-up and reaccreditation) and joint programme review are not fully developed as national protocols, which would set a framework

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[1] 'Audit' refers to a review of an IQAS (currently, IQAS certification / PACE - SGIC).

for ACPUA's processes, have yet to be approved by the national authorities (see also the Background to the Review). The panel received from ACPUA the REACU protocols for joint programme review and institutional follow-up accreditation which will provide the basis for national protocols.

As stated in the SAR, ACPUA has taken several steps to implement the 2016 review recommendations. In 2017, the agency introduced the IQAS certification scheme which provides the basis for initial institutional accreditation; five centres of the two Aragon universities have received certification and have been granted initial accreditation. Institutional accreditation is included in the Strategic Plan and translated into the 2020 goals to promote the process and develop institutional follow-up and reaccreditation protocols. ACPUA's recent dialogue meetings with HEIs (see ESG 3.1) aimed to promote institutional accreditation. As the panel learned from the Director, the agency has developed a preliminary draft protocol for institutional follow-up accreditation, where it seeks to ensure better integration of student-centred learning (SCL); the draft will be finalised when a national protocol is approved. Finally, the increasing involvement of international experts, especially since 2019, alongside external stakeholders and students, aims to ensure that evaluations give more consideration to SCL.

In the discussions with the panel on SCL, some members of the ACPUA bodies responsible for evaluation methodologies and processes referred in broad terms to the need for a change of paradigm from student obligations to student rights, and to education that responds to the needs of students and society and ensures graduate employability. Other participants highlighted the diversity and flexibility of teaching and learning methods; student assessment methods adapted to teaching and learning approaches; support for underachieving students; and student feedback collected through surveys.

As the panel learned from the representatives of the Ministry of Science, Higher Education and Knowledge Society, SCL is a policy priority and the Ministry is planning to create a forum for interaction with students that will be used to design strategies promoting SCL.

The table below, based on Annex VIII of the SAR (as amended by ACPUA before the panel's site visit), shows the self-assessed compliance of ACPUA's evaluation criteria with Part 1 of the ESG.

Analysis

The panel is unable to comment on how Part 1 of the ESG is addressed in **institutional follow-up** and **joint programme review** as approved evaluation protocols are not available yet. The REACU protocols only outline the frameworks for the two processes. The panel notes, however, that the framework for institutional follow-up is largely based on the ESG, and the one for joint programme review broadly follows the European Approach for Quality Assurance of Joint Programmes.

The panel confirms that Part 1 of the ESG are not addressed in training school accreditation and teaching staff evaluation system audit, and are not directly addressed in initial institutional accreditation, as indicated in the table below. There are no specific criteria for **initial institutional accreditation**, but the process is based on IQAS certification and programme reaccreditation reviews, both embracing Part 1 of the ESG, as discussed below. **Training school accreditation** is based on follow-up and reaccreditation reports for the university's teacher training programmes and additional documents that relate specifically to the hosting of student internships. There are only three specific criteria which applications should address: (1) Commitment: submission of an application for accreditation with the approval of the management and academic staff of a school; (2) Participation: hosting student internships for at least two years; (3) Results: no incidents in internship hosting identified in the university's reports or other documents; student satisfaction rates, and no student complaints. **Teaching staff evaluation system audit** is a specific process that provides the basis for the Government of Aragon to grant salary allowances to individual academic teachers at the University of Zaragoza. ACPUA verifies whether

SAR: Alignment of ACPUA's evaluation criteria with Part 1 of the ESG

ESG PART 1	PROGRAMME EVALUATIONS			INSTITUTIONAL EVALUATIONS								
	Initial accreditation	Accreditation (Accreditation renewal)	Follow-up	IQAS certification	Institutional accreditation	Follow-up	ALCAEUS (*10)	HEI initial accreditation	Partner HEI evaluation	Training school accreditation	DOCENTIA	Teaching staff Evaluation System Audit
1.1. Policy for QA	9	3	3	1.1	Assessment based on IQAS certification and programme reaccreditation (*8)	In development	1, 3	A	1	Certification based on the programme follow-up and reaccreditation reports (*14)	1	N/A (*17)
1.2. Design and approval of programmes	2, 5, 8	1	2, 5, 8	2.1			4a.1	N/A	N/A		2	
1.3. Student-centred learning, teaching and assessment	3, 5, 8	1, 6	1, 6	3.1			4a	N/A	N/A		2	
1.4. Student admission, progression, recognition and certification	4	1.4, 1.5	1.1, 1.2	3.1			N/A	N/A	N/A		N/A	
1.5. Teaching staff	6	4	4	3.2			5	B	2		1, 2, 3	
1.6. Learning resources and student support	7	5	5	3.3			6	C	3		2	
1.7. Information management	8, 9	3, 7	3, 6	4.1, 5.1			1	N/A	N/A		2	
1.8. Public information	4	2	2	5.2			2 / 2.1	N/A	N/A		1, 2	
1.9. On-going monitoring and periodic review of programmes	8, 9	1, 3	1.1, 3	2.1			N/A	N/A	N/A		2	
1.10. Cyclical external quality assurance	(*1)	(*3)	(*5)	(*7)	(*9)		(*11)	(*12)	(*13)	(*15)	(*16)	(*18)
Reference document	Evaluation Protocols			Evaluation Protocols			Evaluation Protocols					
	(*2)	(*4)	(*6)									

(*1) Official degrees undergo a cyclical external evaluation; reaccreditation every 6 years for Bachelor's and PhD degrees and every 4 years for Master's degrees (Royal Decree 1393/2007 as amended).

(*2) This refers to Bachelor's and Master's degrees (Guide for the Study Programme Initial Accreditation of Degree and Master). For PhD degrees: all Part 1 standards are considered, although they may appear to be linked to other criteria due to the specificity of programmes reflected in the adapted evaluation protocol.

(*3) Official degrees undergo a cyclical external evaluation: reaccreditation every 6 years for Bachelor's and PhD degrees and every 4 years for Master's degrees (Royal Decree 1393/2007 as amended).

(*4) This refers to Bachelor's and Master's degrees (Guide for the Study Programme Accreditation of Degree and Master). For PhD degrees: all Part 1 standards are considered, although they may appear to be linked to other criteria due to the specificity of programmes reflected in the adapted evaluation protocol.

(*5) Official degrees undergo a cyclical external evaluation: reaccreditation every 6 years for Bachelor's and PhD degrees and every 4 years for Master's degrees (Royal Decree 1393/2007 as amended).

(*6) This refers to Bachelor's and Master's degrees (Guide for the Study Programme Accreditation of Degree and Master). For PhD degrees, all Part 1 standards are considered, although they may appear to be linked to other criteria due to the specificity of programmes reflected in the adapted evaluation protocol.

(*7) Certification requires renewal every 5 years.

(*8) Initial institutional accreditation may be applied for only by centres with IQAS certification and 50% of reaccredited programmes (Royal Decree 420/2015)

(*9) Certification requires renewal every 5 years.

(*10) A certificate in the Programme may be applied for by centres with a certified IQAS. Compliance with ESG 1.4 and 1.9 is reviewed as part of IQAS certification.

(*11) Certification requires renewal every 5 years.

(*12) The process is based on a review of the proposed teaching offering, human material and financial resources (Royal Decree 420/2015). Once a centre has been accredited, its programmes undergo a cyclical accreditation review (Royal Decree 1393/2007 as amended).

(*13) The process is based on a review of the teaching offering, human, material and financial resources (Royal Decree 420/2015). Once a centre has been evaluated, its programmes undergo a cyclical accreditation review (Royal Decree 1393/2007 as amended).

(*14) The process is based on programme follow-up and reaccreditation reports.

(*15) Certification requires renewal every 3 years.

(*16) Certification requires renewal every 5 years.

(*17) The process consists of the certification of the teaching staff self-evaluation carried out annually by the University of Zaragoza.

(*18) Annual certification.

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the university's system works in compliance with the requirements set by the legislation (e.g. no disciplinary penalty or negative outcome of a performance appraisal; teaching courses in English; participation in conferences).

According to ACPUA's alignment table, **HEI initial accreditation** and **partner HEI evaluation** address ESG 1.1, 1.5, 1.6 and 1.10. The criteria for the two processes are very similar, covering teacher and student offering, human, material and financial resources. In the panel's view, they do not address some key elements of ESG 1.1, including a published QA policy, organisation and principles of the QA system and stakeholder involvement in QA. They focus on aspects such as the extent to which the teaching offering of a centre is consistent with its profile and the offering of the university; an adequate number of student places in relation to the demand; and, for partner HEI evaluation, elements such as mechanisms to prevent student dropout which could undermine the viability of a centre. The criteria embrace ESG 1.5 with regard to the adequate number, qualifications and development of teaching staff, though not explicitly with regard to staff recruitment, and cover learning resources and student support services as included in ESG 1.6. As regards ESG 1.10, the two processes are not cyclical but, as indicated in the agency's table, programmes at centres which have successfully undergone such a

review are subject to programme accreditation reviews. Considering this, the lack of correspondence between the criteria of the two processes and ESG 1.1 is not an issue in the panel's view.

The other six processes include **initial programme accreditation, programme follow-up and programme reaccreditation**, **IQAS certification, DOCENTIA,** and **ALCAEUS**. The panel does not consider programme modification (listed as part of initial programme accreditation in the ToR for this review) separately as the process reviews only changes in initially accredited programmes which have undergone a review based on the initial accreditation criteria. The criteria for Master's and Bachelor's degree programmes and Master's programmes in arts fields, and PhD programme are essentially the same, except for addressing aspects specific to research in PhD programmes. Thus, these initial programme accreditation processes are considered jointly. The panel's comments on ALCAEUS are based on the evaluation protocol approved for the pilot run of the process.

ESG 1.1: The three programme accreditation processes address structures, processes and procedures as part of an IQA policy and, additionally, the effectiveness of an IQA system in follow-up accreditation and reaccreditation. The agency could, however, review the criteria for full coherence as external stakeholder involvement is more explicitly taken into consideration in initial accreditation and the follow-up than in reaccreditation. IQAS certification takes into account all key elements of ESG 1.1 at the unit (centre) level. DOCENTIA addresses comprehensively the rationale, objectives, structures and mechanisms of a teaching activity evaluation system, and measures to ensure its acceptance among teaching staff. Understandably, ALCAEUS tackles a QA policy by focusing specifically on internal and external recognition of the engagement of a centre, staff and students with the SDGs (e.g. internal procedures for the recognition of good practice; external certificates).

ESG 1.2: The criteria for the three programme accreditation processes and IQAS certification embrace in an overall manner the programme design and approval elements of the ESG, though the methodologies could be reviewed for consistency insofar as stakeholder involvement in programme design is not explicitly tackled, in particular, in programme reaccreditation. The standard is indirectly addressed in DOCENTIA which reviews the planning of teaching activity as part of a comprehensive teaching activity evaluation system. Reflecting its specificity, ALCAEUS addresses ESG 1.2 by focusing on guidelines and frameworks for the development of good practices, including specific training and guidance for students and staff, in relation to the SDGs.

ESG 1.3: Initial programme accreditation and reaccreditation focus on the coherence of learning outcomes, contents and graduate profiles, and the achievability of learning outcomes for students; the follow-up process also explicitly addresses the variety of teaching and learning methods to promote student autonomy. While various elements contributing to SCL may be considered in this way, the evaluation methodologies for the three processes do not explain how these elements are expected to be translated into an approach where students take centre stage in curriculum design and delivery, and how learning and teaching is linked to a student-centred approach in assessment.

IQAS certification takes a more holistic approach in reviewing procedures that should involve students and attend to their diverse profiles and should be supported by the use of suitable teaching and learning methods, tutorial action plans, assessment systems and services, and resources that help students achieve learning outcomes. Here too, though, the extent to which SCL is addressed would depend on how the concept is understood.

The relevant criterion in ALCAEUS refers only in broad terms to student-centred programmes that provide students with theoretical and practical training to acquire SDG-related knowledge and competences, and an assessment system that allows verifying whether students have acquired them.

DOCENTIA does not explicitly address SCL. Where HEIs have integrated a student-centred approach into curriculum design and delivery and student assessment, DOCENTIA can be considered to embrace this standard as part of the planning of teaching activity and its evaluation which should involve students.

The panel understands from the discussions during the visit and the evaluation reports examined that there is a need to arrive at a common understanding of the concept of SCL in the Aragon higher education system, and of a coherent approach to addressing student centred teaching, learning and assessment in evaluation methodologies. A debate involving all stakeholders could also feed into SCL strategies that the Ministry of Science, Higher Education and Knowledge Society is planning to devise.

ESG 1.4: ACPUA's criteria for the three programme accreditation processes cover all stages from student admission to graduation. IQAS certification reviews procedures for admission, progression and graduation as parts of student-centred teaching, learning and assessment. The panel confirms that ALCAEUS and DOCENTIA do not address ESG 1.4.

ESG 1.5: Although a transparent process for staff recruitment is not explicitly mentioned, the three programme accreditation processes, IQAS certification, and DOCENTIA in greater detail, address an adequate number, competence and development of teaching staff. ALCAEUS fully addresses ESG 1.5 by looking at elements such as job requirements, staff development plans and opportunities and performance appraisal specifically in relation to the SDGs.

ESG 1.6: Initial programme accreditation focuses on learning resources, while broadly addressing student support (orientation procedures for newly enrolled students and their integration in university life), but both aspects, including their fitness for purpose, are fully taken into account in programme follow-up and reaccreditation, and in IQAS certification. DOCENTIA takes these aspects into account indirectly, insofar as they are relevant to the methodology underlying a teaching activity evaluation system. The ALCAEUS criterion indicated in the table above partly covers ESG 1.4, 1.1. and 1.5 as it refers to funding allocated by a centre to SDG-related initiatives and having a team in place which plans, implements and evaluates SDG-related initiatives, and staff training.

ESG 1.7: Initial programme accreditation broadly addresses information management as part of procedures for the assessment of student progress in learning and achieving learning outcomes, and of an IQAS which should ensure effective implementation and development of a study plan. All aspects of the ESG, including data collection, analysis and use, are explicitly taken into account in programme follow-up and reaccreditation and in IQAS certification. DOCENTIA looks at all these elements in relation to teacher evaluation. Reflecting its specific focus, the ALCAEUS criterion refers to the inclusion of the SDGs in strategic documents of a centre and a periodic review of compliance of activities with specific indicators to be defined.

ESG 1.8: The three programme accreditation processes assess whether a centre publishes a full range of information about a programme. IQAS certification covers a full range of information on a centre's programmes and activities to be published, with an exhaustive list included, and procedures for review and improvement of public information in line with stakeholder needs. Under ALCAEUS, centres are expected to publish information about their SDG-related initiatives. DOCENTIA does not refer explicitly to public information.

ESG 1.9: Initial programme accreditation clearly addresses programme monitoring and review as part of procedures for the assessment of learning outcomes and student progress and an IQAS in place, and the follow-up process as part of an IQAS which should ensure continuous improvement of a programme, and collection, analysis and use of data for programme management and improvement. The criteria for programme reaccreditation refer to mechanisms for coordination between different courses that should allow allocating adequate student workload and adequate time planning for the achievement of learning outcomes. This is further clarified in the evaluation reports examined by the panel; they explicitly address periodic review of the IQAS which should facilitate follow-up, modification

and accreditation of programmes and ensure continuous improvement. IQAS certification explicitly tackles programme monitoring and review that should involve all stakeholders, including students. The panel confirms that ALCAEUS does not directly address this standard, but a centre should evaluate SDG-related activities, as noted under ESG 1.6 and 1.7 above. DOCENTIA focuses on teaching rather than programmes, but periodic evaluation of teaching activity is explicitly addressed in its criteria.

ESG 1.10: The panel confirms that all of the processes which are in place, except initial accreditation reviews and partner HEI evaluation (a review requested by the Government of Aragon where necessary), are cyclical, with intervals as indicated in the explanatory notes to the table above. Programmes at centres which have successfully undergone an initial HEI accreditation review or a partner HEI evaluation are subject to programme reaccreditation reviews. Pursuant to the national legislation, which lays down only general arrangements for institutional reaccreditation, reaccreditation reviews will be conducted at five-year intervals. Based on the evaluation protocol for the pilot phase of ALCAEUS, reviews process will, likewise, be carried out every five years.

Following the 2016 review recommendation, ACPUA has successfully promoted IQAS certification (and initial institutional accreditation based on this process), as evidenced by several centres that have obtained initial accreditation, and continues to do so in its dialogue meetings. Along the same lines, it has made efforts to develop the institutional follow-up accreditation processes which are expected to address better SCL and focus on supporting quality enhancement, even though the progress in its work has been hampered by the COVID-19 pandemic. The agency has also streamlined its programme follow-up to make the programme accreditation processes more coherent, although there is limited space for changes as the procedures are largely predetermined by the national legislation. The programme accreditation processes, and reaccreditation in particular, could still address more explicitly aspects such as stakeholder involvement in IQA, as indicated above.

As indicated above, some of the evaluation processes run by the agency are not designed to, and do not, address Part 1 of the ESG or do so only to a limited extent. The panel considers them as complementary to the main programme accreditation, IQAS certification and institutional accreditation processes. While the various standards of Part 1 are, to a large extent, addressed in the methodologies of the main processes, the panel would have liked to have seen a more explicit transposition of the ten standards of the ESG Part 1 in the various methodologies.

In common with many other higher education systems, there is still some way to go in Spain, and in Aragon, to embedding the concept of SCL into the curriculum. As the panel found in its discussions, the agency's leadership and stakeholders are committed to taking up these issues. The panel considers that it would also be useful to discuss the issues within REACU and provide a common approach to addressing student-centred learning, teaching and assessment in EQA processes across the country.

As the panel is expected to evaluate only what is in place, its conclusion under this standard does not take into consideration joint programme review and institutional follow-up accreditation that are not fully developed yet.

Panel recommendations

The panel recommends that ACPUA develop a coherent approach to address more explicitly student-centred learning, teaching and assessment in its evaluation methodologies, and pay special attention to these issues in its training for reviewers.

Panel suggestions for further improvement

ACPUA could consider how some aspects highlighted in the guidelines to Part 1 of the ESG, such as stakeholder involvement in internal quality assurance, could be more explicitly addressed in its evaluation methodology, in particular, for programme reaccreditation.

The panel encourages ACPUA to initiate discussions within REACU with a view to developing a common approach to addressing student-centred learning, teaching and assessment in external quality assurance processes.

See also ESG 2.2. for the suggestion concerning the development of methodologies for the new processes that is relevant to ESG 2.1.

Panel conclusion: substantially 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.

2016 review recommendation: The panel encourages ACPUA to pursue its efforts to explore the possibilities of adapting procedures to the size and priorities of the regional higher education system. This will benefit as well from deepening the involvement of external stakeholders in designing and assessing existing and future quality assurance mechanisms.

Evidence

ACPUA conducts evaluation processes which are either regulated by national or regional legislation or developed by the agency on its own or in collaboration with REACU agencies.

Where the process is nationally regulated, the legislation sets a broad framework (for example, for institutional accreditation to be based on programme reaccreditation and IQAS certification) or lays down detailed requirements (for example, for programme evaluation and HEI initial accreditation). General common guidelines and criteria are drafted by REACU and subsequently discussed and agreed by the stakeholders within the University Commission for Follow-up and Accreditation (CURSA) and the General Conference on University Policy (CGPU). ACPUA adapts and develops further the general criteria and guidelines in line with the strategic goals and needs of the Aragon higher education system. To do so, it holds consultation meetings with its stakeholders. (SAR)

For the processes that are not nationally regulated, ACPUA follows its internal procedure, while taking into account the regional legislation where applicable (partner HEI evaluation, training school accreditation and teaching staff evaluation system audit). The Board of Directors, which represents all stakeholder groups, approves a new activity and its objectives. CECA drafts an evaluation methodology following internal consultations with the Committee of Experts, Evaluation Committees and reviewers. A draft protocol is sent to HEIs and subsequently discussed in consultation sessions with the stakeholders, including HEIs, reviewers and the regional higher education authorities. The final version of an evaluation protocol, approved by CECA, is published on the ACPUA website. Where time allows, the agency conducts a pilot evaluation to assess the implementation arrangements and impact of the process. For example, it plans to pilot the new ALCAEUS Programme in December 2020. (SAR; Meetings with the stakeholders)

Upon completion of each process, the agency carries out a meta-evaluation, based on feedback surveys among the reviewed HEIs and review panels. ACPUA also collects feedback on its ongoing processes in regular dialogue and various other meetings. CECA modifies methodologies where needed. (see ESG 3.6) (SAR; Meetings with CECA, representatives of evaluated HEIs and external stakeholders).

To address the 2016 recommendation, ACPUA has involved external stakeholders and international experts in its bodies (see ESG 3.1), holds more meetings with the HEIs at the stage of process design, strategically plans its seminars to explain new methodologies, and has introduced special training for QA units in HEIs that prepare documentation for initial programme accreditation (SAR).

As the panel learned from the representatives of HEIs, students and social and business partners, they all contributed to the development of IQAS certification and ALCAEUS. Based on their feedback on the ongoing processes, ACPUA introduced a new training session for HEIs on initial programme accreditation, and an improvement plan into the IQAS certification procedure; and revised the procedure for second programme reaccreditation to make it more flexible and better linked to previous reviews.

ACPUA's evaluation protocols define the objectives, procedures, criteria, possible outcomes and follow-up arrangements for each process. Each process ends with an evaluation report that contains the agency's decision (see ESG 2.5). Most processes include a follow-up (see ESG 2.3). (SAR; Evaluation protocols) As explained under ESG 2.1, the methodologies for institutional follow-up accreditation and joint degree evaluation are not fully developed yet. ACPUA's evaluations outside Aragon are based on agreements with the competent bodies (e.g. the Andorran QA agency). As explained by the Director, the agency largely follows its regular methodology, but panels include professionals from a given country and the evaluation protocol is adapted to the national legislation.

In the view of the Evaluation Committees, the evaluation processes combine in a balanced way the accountability and enhancement dimensions of EQA; while reviewing compliance with legal requirements, they identify good practices and make recommendations that lead to improvements. As explained by the representatives of HEIs, evaluations have guided centres in developing a systematic approach to IQA and establishing an IQAS, engaging in continuous reflection on improvement and in continuous improvement of degree programmes. They have led to tangible improvements such as strategic and quality goals defined and regularly reviewed; involvement of staff and students in IQA; mechanisms in place for programme reviews and graduate career tracking; better definition of student competences.

ACPUA is now shifting the focus in its activities from programme accreditation to institutional accreditation. The ACPUA bodies responsible for EQA activities and the representatives of HEIs highlighted the benefits of initial institutional accreditation as a process which encourages centres to take a strategic approach to quality management, 'synchronise' programme-level IQA mechanisms and involve all stakeholders in IQA, and which simplifies and de-bureaucratises EQA processes and ensures more efficient use of the resources available at HEIs. As explained in the SAR and the discussions with the Director, institutional follow-up accreditation should focus more on quality enhancement, the identification of innovative practices and the congruency of IQA procedures with a centre's goals.

Analysis

ACPUA operates in a highly regulated context where both the objectives and procedures for most of its evaluation processes are, to a large extent, laid down by legislation. In practice, however, as the panel found in the discussions with the Director, the agency actively contributes to the design of the nationally regulated processes via REACU, and the Aragon authorities and universities take advantage of their involvement in CGPU and CURSA, to ensure the relevance of processes to regional priorities and needs. The panel also notes that, at the regional level, ALCAEUS is most welcome by policy makers, HEIs and social and business partners alike as a scheme that pursues their shared priority of promoting the social dimension in higher education (see ESG 3.1).

The agency invests great effort to develop fit-for-purpose evaluation methodologies through a procedure involving extensive internal and external consultations and pilot implementation of processes. A pilot run of institutional follow-up accreditation would be important to assess its efficiency and effectiveness and its added value in relation to the other established processes.

It is also clear to the panel that the agency has made great strides since the 2016 review in ensuring greater involvement of students, professionals and other stakeholders in its bodies responsible for EQA activities (see ESG 3.1) and in the design of the various EQA processes and methodologies. The agency also makes commendable efforts to seek inputs from its stakeholders through meta-evaluations and dialogue meetings and to integrate them in continuous improvement of its ongoing processes.

ACPUA conducts some specific evaluation processes, including, for example, HEI initial accreditation, partner HEI evaluation and teaching staff evaluation system audit, which serve mainly regulatory or accountability purposes. This is clearly reflected in the evaluation methodologies which are based on a quantitative approach and associated indicators (e.g. number and formal qualifications of teaching staff, teacher-student ratios; financial situation; no negative outcome of a teacher performance appraisal).

Programme accreditation and IQAS certification aim to serve both accountability and enhancement purposes. Within the highly regulated national framework for programmes, in response to the 2016 review recommendation, ACPUA has clearly made efforts to streamline the programme accreditation system, and also shift it more towards quality enhancement, by focusing in the second accreditation renewal round on improvement plans for degrees, based on previous reviews, and action taken to overcome weaknesses and further develop strengths. IQAS certification aims to combine the two dimensions of EQA. Its methodology focuses quite heavily on the structures, procedures and mechanisms required to be in place. However, the evaluation reports that the panel examined also address the effectiveness of the IQA in place and provide clear guidelines for quality improvement going beyond purely quantitative aspects. The follow-up in programme (re)accreditation and IQAS certification is a light procedure based on an improvement plan. Programme accreditation and IQAS certification are well designed so as to complement rather than duplicate each other as the latter clearly focuses on overall quality management at centre level. It is also clear to the panel from the discussions with the representatives of HEIs that the benefits from setting up a functional IQAS and improving degrees far outweigh the costs in terms of the time and resources invested.

The panel welcomes the current shift in the focus of ACPUA's activities from the centralised and dirigiste system of programme accreditation to a more autonomous system of institutional accreditation based on programme reaccreditation and IQAS certification. Initial accreditation, gradually introduced in recent years, evidently increases the overall efficiency of the agency's EQA system and reduces the workload for HEIs related to its processes, in line with the 2016 review recommendation. The panel also supports the agency's plans to design institutional follow-up accreditation so that it focuses more on quality enhancement and congruency of IQA procedures with a centre's goals. However, since a methodology for institutional follow-up accreditation is not yet fully developed and the REACU protocol provided by ACPUA describes only a broad framework for the process, the panel is unable to comment on the overall coherence and fitness-for-purpose of the institutional accreditation system. As the panel's conclusion may take into account only what is in place at the time of the review, this is addressed by a suggestion for further improvement.

The panel is also unable to comment on the methodology for joint programme review as it, too, is not fully developed yet and the REACU protocol does not provide sufficient detail. The panel notes, however, that the protocol is based on the European Approach for Quality Assurance of Joint Programmes. The use of this approach by the agency will be particularly important when dealing with any new programmes developed under the European University alliance that the University of Zaragoza has recently entered into.

Based on ACPUA's report on the reviews conducted in Andorra, the panel confirms that the methodology for such processes takes due account of the national legislation. Its fitness for purpose is enhanced by the involvement of local professionals.

Panel commendations

The panel commends ACPUA for involving extensively all stakeholders in the design of its evaluation methodologies, and for seeking regularly and integrating their inputs in continuous improvement of its processes.

Panel suggestions for further improvement

The panel suggests that ACPUA prioritise the development of a methodology for institutional follow-up accreditation geared towards supporting university centres in quality enhancement and thus enhancing the overall fitness-for-purpose of the institutional accreditation system, and a methodology for joint programme review consistent with the European Approach for Quality Assurance of Joint Programmes.

Panel conclusion: fully 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

2016 review recommendation: The panel considers that ACPUA should reflect on the possibility of involving stakeholders other than those from universities in oversight committees for evaluation processes.

Evidence

The procedures for individual evaluation processes are described in ACPUA's evaluation protocols and guides and published on its website. The table below, based on the SAR and evaluation protocols, provides an overview of the stages in each process.

Evaluation scheme	Self-assessment	External assessment		Report		Follow-up
		Responsible body / panel	**Site visit**	**Report**	**Responsible body / panel**	
Programme evaluations						
Initial accreditation*	√	CER		√	SET	√
Follow-up	√	Follow-up Committee	√**	√	SET	N/A
Accreditation (Renewal)	√	Review panel	√	√	Initial report: Review panel; Final report: SET	√
* Initial accreditation, including modification. **In case the positive outcome of an accreditation review is linked to the submission of an improvement plan.						
Institutional evaluations						
IQAS certification	√	Review panel	√	√	Initial report: Review panel; Final report: SEC	√

(Initial) Institutional accreditation		SEC		√	SEC	In develop-ment
Follow-up accreditation	In development					
HEI initial accreditation	√	Review panel		√	Initial report: Review panel; Final report: SEC	
Partner HEI evaluation	√	Review panel	√	√	Initial report: Review panel; Final report: SEC	
Training school accreditation	√	SEC		√	SEC	√
ALCAEUS	√	Review panel	√	√	Initial report: Review panel; Final report: SEC	√
DOCENTIA	√	Review panel	√	√	Initial report: Review panel; Final report: SEC	√
Teaching staff evaluation system audit	√	SEC		√	SEC	

For full names of the ACPUA bodies involved, see the Glossary at the end of the report.

The SAR explains the reasons for no site visit and / or no follow-up in the other processes:
- Initial programme accreditation: no site visit as this is an ex-ante programme evaluation.
- Initial institutional accreditation: no site visit as the process is based on IQAS certification and reaccreditation reviews of programmes, both including a site visit.
- HEI initial accreditation: no site visit as the process applies to new centres; no follow-up as programmes in accredited centres undergo a mandatory programme accreditation review.
- Partner HEI evaluation: no follow-up as such evaluations are requested by the Government of Aragon when considered necessary; programmes in evaluated HEIs undergo a mandatory programme accreditation review;
- Training school accreditation: no site visit and follow-up as the process is based on programme reaccreditation and follow-up reports for the teacher training programmes concerned.
- Teaching staff evaluation system audit: no site visit and follow-up as this is a specific regionally regulated process where ACPUA reviews the University of Zaragoza's annual self-evaluation reports to ensure that the internal system works according to the official criteria.

As explained under ESG 2.1 and 2.2., evaluation methodologies for institutional follow-up and joint programme review are not yet fully developed.

ACPUA has in place the following mechanisms to ensure that the evaluation processes are reliable and consistently implemented:
- Evaluation protocols and guides, including templates for documents to be submitted by HEIs and for evaluation reports, are published on the agency's website.
- The agency provides training to HEIs and review panels (see also 2.4).
- Each panel includes at least one reviewer with previous involvement in the agency's evaluations. As an ad-hoc arrangement, where several centres are evaluated in parallel, panels have the same chair, if possible.
- Technical staff assist review panels and the Evaluation Committees throughout an evaluation. Quality technicians are appointed as technical secretaries of panels. They participate in all

panel meetings before, during and after a site visit, and in all Committee meetings, and are available on an ongoing basis to provide assistance. Technical staff are coached internally for their tasks and new staff participate in evaluations as observers.

- The agency's TRELLO platform for collaborative work helps panels and the Committees to follow a systematic approach at each stage of the evaluation process.
- The agency collects feedback from HEIs through a meta-evaluation after each review and in regular dialogue meetings (see ESG 3.6)

(SAR; Meetings with the Evaluation Committees, staff and reviewers)

As regards the 2016 recommendation, ACPUA's Evaluation Committees, as well as review panels, currently include non-academic external stakeholders (see ESG 3.1).

The reviewers whom the panel met find the agency's protocols and guidance very clear and the training sessions sufficient to gain a good understanding of the evaluation methodology (see ESG 2.4). The representatives of reviewed HEIs appreciate the protocols and guides and training sessions that guide them through all stages of a process and are tailored to the specific profile of each centre.

Analysis

The panel confirms that the evaluation processes currently in place, as well as ALCAEUS in its pilot phase, are based on predefined and reliable methodologies which are clearly described in the protocols and guides available on the ACPUA website. The panel's discussions during the site visit also clearly indicate that the processes are very useful for HEIs (see ESG 2.2).

The panel recognises that the traditional programme accreditation system, including initial accreditation, follow-up and reaccreditation, is well developed and largely follows all of the stages recommended under this ESG. Programme follow-up is identified by the agency as a separate process, but it forms an integral part of initial accreditation and reaccreditation as it focuses on improvements made, based on findings from either of the two processes. A site visit, which is undertaken in the follow-up phase where a positive outcome of a (re)accreditation review was conditional on the submission of an improvement plan, makes the initial accreditation and follow-up processes more reliable. However, as a site visit usually offers useful inputs for improvement, the agency may consider including a visit in initial programme accreditation, at least for programmes designed by centres which have not yet successfully undergone an IQAS certification review.

The panel notes that a methodology for joint programme review has yet to be developed, although the REACU protocol provided by the agency indicates that the process will follow the four recommended stages.

The panel recognises the changing nature of the EQA system in Spain and in Aragon with the move from programme accreditation to institutional accreditation based on programme reaccreditation and IQAS certification. The two processes, both following the four stages recommended under this standard, provide a solid basis for initial institutional accreditation. However, the institutional accreditation system is still at a relatively early stage of development, and the follow-up to initial institutional accreditation has yet to be designed, let alone implemented. The panel is expected to evaluate only what is in place, but it notes that the REACU protocol agreed for the process covers the four recommended stages.

HEI initial accreditation, partner HEI evaluation, training school accreditation and teaching staff evaluation system audit are all based on a self-assessment and end with a report but do not include a follow-up and / or a site visit. The panel agrees, overall, with ACPUA that this is justified by the specific nature of these processes (though, in principle, a new centre, like a new programme, could still benefit from a site visit as part of initial accreditation, as noted above).

DOCENTIA includes the phases of design evaluation, implementation follow-up and certification, with each phase based on a self-assessment and ending with the agency's report, and a site visit undertaken in the final phase. This is a reasonable arrangement as DOCENTIA is a voluntary process complementing ACPUA's main processes that evaluate various aspects of the teaching activity at programme and centre levels. As ALCAEUS is a pioneering process, all of the four recommended stages are essential to maximise its usefulness. Based on the discussions with the agency, the panel is confident that the process will be based on the normal four stages after the pilot phase is completed.

SARs to be submitted by HEIs are well structured to provide relevant evidence for external evaluations. As the panel learned from the Evaluation Committees, the quality of SARs has improved in recent years; this also indicates that the guidelines and the training sessions, in which the agency has invested great effort, are indeed useful. Based on the evaluation protocols and the discussions with students, the panel also notes that review panels interview the relevant stakeholders during a site visit, and that the feedback gathered from students feeds into evaluation findings. Except in problematic cases in programme accreditation and IQAS certification, the follow-up in most processes is a desk-based review, which is sufficient for this intermediate stage of the evaluation cycle. The follow-up arrangements, including the intervals for reporting, are clearly described in the protocols, and follow-up reports are structured around the evaluation criteria where areas for improvement have been identified, which ensures a consistent approach.

The panel notes that some processes (initial programme accreditation and programme follow-up; initial institutional accreditation; training school accreditation; teaching staff evaluation system audit) are conducted by ACPUA's Evaluation Committees rather than review panels. This does not undermine the usefulness of the processes as the agency has committees for all fields of knowledge and, following the 2016 review recommendation, the Evaluation Committees now include not only academic staff and students, but also non-academic stakeholders, as well as international experts.

Overall, with the protocols and guides, training for HEIs, reviewers and technical staff, the selection of reviewers which ensures that at least one member of each panel has already worked with the agency, the support from technical secretaries and the use of the TRELLO platform, ACPUA has in place a set of sound mechanisms to ensure consistency in the implementation of its evaluation processes. These are further strengthened by the agency's mechanisms for collecting feedback on completed evaluations, which may help to rectify any shortcomings.

Panel suggestions for further improvement

The panel encourages ACPUA to consider conducting a site visit as part of initial accreditation reviews of programmes designed by centres which have not yet successfully undergone an IQAS certification review.

Further to the suggestion under ESG 2.2, the panel encourages ACPUA to pursue vigorously its efforts to design methodologies for the new processes based on the four stages as recommended under ESG 2.3.

Panel conclusion: fully 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).

2016 review recommendation: The panel recommends that ACPUA should consider involving representatives from employers and broader society in expert panels. The panel considers that this

would assist the Agency in developing thematic reviews and in meeting society's demands and expectations for information. The panel furthermore recommends to review the selection mechanism of international experts, in order to facilitate the participation of international experts in review panels.

Evidence.

Depending on the process (see the table under ESG 2.3), external evaluations are conducted by review panels or the Evaluation Committees. Panels submit evaluation reports to the relevant Evaluation Committee and the Committees produce final evaluation reports in all processes.

The Evaluation Committees are composed of national academics with considerable teaching or research and QA expertise, students with QA experience and reputable professional practitioners, all coming from outside Aragon, and international experts. The Committees by Field of Knowledge cover all academic areas. The Committees work independently of the other ACPUA bodies (see ESG 3.3). Their members sign the Code of Ethics. (SAR; Internal regulations; Meeting with the Committees)

ACPUA's Reviewer Selection Procedure sets out general criteria for all categories of reviewers to be registered in the Pool, including academic reviewers, international experts, students and external stakeholders, and arrangements for the selection, training and performance appraisal of reviewers.

Interested reviewers register in ACPUA's Pool via its website. The agency has agreements with other REACU agencies for the exchange of reviewers. It also finds prospective reviewers through its national and international links and encourages them to register in the Pool. Following the 2016 review recommendation, ACPUA has extended the Pool to include external stakeholders and international experts. Currently, 1,437 national and 35 international experts are registered in the Pool. (SAR; Meetings with the Director and reviewers)

Reviewers who have professional ties with the Aragon universities (academic and international experts), have studied for or obtained a degree in the last three years at an Aragon university (students), or conduct their professional activity mainly in Aragon (external stakeholders) may be involved only in evaluations that ACPUA undertakes outside the Autonomous Community. The criteria for reviewers include teaching and university management experience for academic and international experts; QA experience for these two categories and students; and an officially recognised degree and familiarity with ACPUA's activities for external stakeholders. International experts should also be fluent in Spanish. (Reviewer Selection Procedure)

Reviewers for individual evaluation panels are preselected by technical staff and selected by CECA. The selection is based on specialist expertise, QA experience and gender balance; additionally, at least one panel member should have previous experience of working with the agency. The composition of the panel is forwarded to the HEI under review which may raise objections, and the panel is formally appointed by the Director. Before the appointment, reviewers are required to sign the Code of Ethics. (SAR; Reviewer Selection Procedure; Meetings with CECA and staff)

As defined in the evaluation protocols, the composition of panels for individual processes is as follows:
- Programme reaccreditation: at least two academic experts, a student, an external stakeholder or professional and, where possible, an international expert, all with expertise in the field of knowledge of the degree programme(s) to be evaluated. Since 2020 all review panels have included international experts (SAR).
- IQAS certification: experts in quality management, including an academic expert representing the field of knowledge to which most programmes provided by a given centre are assigned, a student and an external stakeholder / professional.
- HEI initial accreditation: three institutional management and academic experts.

- Partner HEI evaluation: three experts, including an economist with experience in university management as a former university or affiliated centre manager, a former director of a prestigious affiliated centre, and an expert in evaluation methodologies.
- ALCAEUS: at least one academic expert, an expert in national or international sustainability, a student or researcher in training, and an external stakeholder;
- DOCENTIA: at least four experts, including academic experts who have held a position related to the management of teaching staff or have experience in academic staff appraisal and / or international teaching experience; a student and, where appropriate, a non-academic professional expert in human resources and quality management.

Before an evaluation, technical staff provide training to review panels which covers ACPUA's activities, processes and values, and the methodology for a given process and report writing. All sessions are recorded so that they are accessible to reviewers later on, and the agency can evaluate them. The reviewers whom the panel met commended the agency for the training, which is customised depending on previous work experience with a Spanish agency. Students also appreciate very much student training sessions run jointly by the REACU agencies. (SAR; Reviewer Selection Procedure; Meetings with staff, reviewers and students)

As the panel learned from reviewers, each panel works as a team where all members, including students and practitioners, have the same level of responsibility, ask questions during a site visit, look at the same aspects and contribute their specific expertise. Students feel they are treated as full and equal panel members and appreciate that ACPUA collaborates with other agencies to train them.

The performance of reviewers is assessed upon completion of each evaluation by the technical secretary of the panel and the relevant Evaluation Committee. The criteria include teamworking skills, completion of tasks by deadlines, technical competence and the quality of deliverables. (SAR) Reviewers whose performance has not been satisfactory are not invited to participate again. As explained under ESG 3.6, reviewers do not receive direct feedback on their performance.

Analysis

Evaluations in all processes, except HEI initial accreditation and partner HEI evaluation, are conducted in compliance with the ESG, and in line with the 2016 review recommendation, by the Evaluation Committees or review panels, which bring together external experts, including academics, students and professional practitioners. The panel also notes that the Evaluation Committees (see also ESG 3.1) and review panels ensure genuine and full involvement of student members.

While review panels in HEI initial accreditation reviews and partner HEI evaluations do not include students, the panel considers that this is justified by the specificity of the two processes. Both focus on quantitative indicators for the teaching offering and human, material and financial resources (see ESG 2.1), where a student perspective could hardly provide added value. Furthermore, where the outcome is positive, programmes in accredited or evaluated centres undergo accreditation reviews conducted by a panel or the relevant Evaluation Committee, which involves students.

The Reviewer Pool is quite big, in particular for the small Aragon higher education system, even if this is not necessarily a fully meaningful indicator since, as the panel learned from the agency, the Pool is open to any interested experts and the selection is made at the stage of appointing individual panels. ACPUA does not advertise reviewer recruitment via any national or international channels, relying on interested experts to register on their own initiative or upon ACPUA's suggestion, on other Spanish agencies and on its own links. While this might potentially limit the range of external expertise that the agency can benefit from, the panel has found no evidence that ACPUA is struggling to find in the Pool suitable academics, students or practitioners for its panels.

Since the 2016 review, ACPUA has made commendable efforts to involve international experts, who are now members of the Evaluation Committees and all programme reaccreditation panels. As the agency is now refocusing its activities towards institutional accreditation, the panel believes that IQAS reviews, in particular, in the second certification cycle, could benefit greatly from an external perspective offered by international experts. To ensure that a wide range of most competent experts are involved, ACPUA may consider being more pro-active in looking for experts via QA agencies beyond Spain or other international channels.

The panel finds that the agency has in place mechanisms to ensure that competent and suitable reviewers are selected from the Pool, with the two-stage procedure that involves the technical staff and CECA scrutinising reviewer profiles, the possibility for HEIs to raise reasoned objections, and the rule that each panel includes at least one expert with prior experience in the agency's evaluations. The agency takes care to ensure that the training gives all reviewers a good understanding of the overall framework of ACPUA's activities and the evaluation methodology for a given process. The reviewers were particularly complimentary of the TRELLO platform which greatly facilitates, and guides them in, their work. The performance appraisal procedure for reviewers allows the agency to assess all relevant aspects of their work, though the feedback loop between the agency and reviewers has yet to be closed, as recommended under ESG 3.6. The panel's discussions with the representatives of evaluated HEIs provide ample evidence that review panels, as well as the Evaluation Committees, perform their duties to a high standard.

A no-conflict-of-interest principle is built into the composition of the Evaluation Committees and review panels insofar as all of their members come from outside Aragon. As noted earlier, the Code of Ethics, signed by Committee and panel members, clearly defines a conflict-of-interest situation and requires that they adhere to the principles of independence and impartiality.

Panel commendations

The panel commends ACPUA for involving international experts in all programme reaccreditation reviews.

Panel suggestions for further improvement

As ACPUA is refocusing its activities towards institutional accreditation, the panel encourages it to consider involving international experts in IQAS certification reviews.

Panel conclusion: fully 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 criteria for all of the evaluation processes in place are defined in the evaluation protocols and guides, which are published on ACPUA's website. Except for programme follow-up which ends with recommendations where appropriate, all processes lead to a formal outcome (favourable or unfavourable, or favourable, conditional, unfavourable). Evaluation decisions are taken by the Evaluation Committees (see also ESG 3.3). (SAR; Evaluation Protocols)

ACPUA's evaluation outcomes are final formal decisions in IQAS certification, training school accreditation, teaching staff evaluation system audit, DOCENTIA (and will be final formal decisions in ALCAEUS). Based on the agency's final evaluation reports, the Council of Universities / the Spanish Government takes final decisions in initial programme accreditation, programme reaccreditation and initial institutional accreditation, and the Government of Aragon in HEI initial accreditation and partner HEI evaluation. (SAR; Evaluation protocols)

Most of the agency's processes (see ESG 2.3) follow a two-stage model: a review panel conducts an external evaluation, prepares a report and submits it to the Programmes or Institutions Evaluation Committee, and the Committee produces the final report which contains the final outcome. In the other processes, the competent Committee by Field of Knowledge or the Follow-Up Committee carries out an evaluation and drafts a report for the Programmes Evaluation Committee who produces the final report, or the Evaluation Committee conducts an evaluation and produces the final report.

CECA and the Evaluation Committees discuss criteria in detail at the stage of designing a methodology and after its final approval to ensure they are clearly defined and consistently interpreted within the agency. The agency has put in place the following mechanisms to ensure consistent application of the criteria in evaluation processes:

- Before an evaluation, review panels attend a training session. Additionally, each panel includes at least one reviewer with previous involvement in the agency's evaluations. (See also ESG 2.3 and 2.4)
- Technical staff support review panels and the Evaluation Committees throughout the evaluation process. Quality technicians are appointed as technical non-voting secretaries of panels to ensure that the criteria are applied systematically and uniformly and to clarify any doubts reviewers may have in interpreting the criteria. (For further details, see ESG 2.3) The technical team also provides support to ensure that there are no errors in the interpretation of the criteria in reports.
- Reviewer reports are scrutinised and moderated by the Evaluation Committees. The Committees do not change the substance of reports, instead their role is to ensure that the views of different panels involved in programme and institutional reviews are presented in a consistent manner in the final versions of all reports.
- The agency's TRELLO platform for collaborative work helps review panels and the Evaluation Committees to follow a systematic approach at each stage of the evaluation process.
- The agency collects feedback from HEIs through a meta-evaluation after each review and in regular dialogue meetings, and quality technicians and the Evaluation Committees assess the performance of reviewers (see ESG 3.6 and 2.4)

(SAR; Meetings with CECA, the Evaluation Committees, staff and reviewers)

Analysis

The panel confirms that the evaluation criteria are defined in the protocols and guides, which are easily accessible on the ACPUA website. The criteria are explicit and detailed, with sub-criteria or guidelines which clearly indicate what evidence should be collected and analysed to assess the level of compliance. The protocols and guides also clearly define general requirements for compliance levels under the individual criteria and for final formal outcomes. The panel's view is shared by the reviewers and the Heads and QA Officers of evaluated HEIs interviewed who all expressed their appreciation for the clarity and readability of the agency's documents.

The panel finds that the agency has put in place a system designed to ensure that the final reports from evaluations are as consistent as possible in addressing the evaluation criteria. The reviewers confirmed that the discussions in the training sessions and the presence of a panel member with prior experience

of working for the agency are very helpful to gain a common understanding of the criteria. Nothing was indicated to the panel in the meetings that raised any concerns or confusion among the reviewers as to what their function was in relation to findings for the processes they were engaged in. With the involvement of technical staff in review panels and the arrangement that the Evaluation Committees produce the final reports, consistency can be effectively ensured throughout each review. The panel has gathered ample evidence in the discussions with the Committees, reviewers and representatives of evaluated HEIs that the technical staff are well trained for their role of 'consistency assistants' and their support in this respect is highly valued. A systematic and uniform approach in discussions within review panels and the Committees is, clearly, also helped by genuine involvement of all members, which the panel highlighted earlier, and by collective decision-making.

Within the small Aragon higher education system, the evaluated institutions can easily detect any inconsistencies in how the criteria are being applied in practice and draw ACPUA's attention to the issue through its feedback collection mechanisms. The panel has found no evidence of such issues in the interviews, and the Heads and QA Officers of HEIs were very complimentary about the agency's performance in this regard. The panel also confirms that the criteria are applied uniformly in the sample of evaluation reports examined.

Evaluation methodologies, including criteria, have yet to be developed for institutional follow-up and joint programme review, and ALCAEUS has yet to be piloted (see ESG 2.1, 2.2. and 2.3). However, as the mechanisms for ensuring consistency work transversally in all the current evaluation processes, the panel is confident that ACPUA will follow the same approach for the new processes.

Panel conclusion: fully 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.

2016 review recommendation: The panel considers that ACPUA should remain vigilant to the need for consistency in the production of reports, especially in view of the expected growth in the number of type of activities.

Evidence

The structure of reports is defined in the documentation accompanying ACPUA's evaluation processes. Training for review panels covers report writing (see ESG 2.4).

Two kinds of reports are prepared in evaluation processes: initial reports drafted by review panels (where involved; see ESG 2.3) or the Evaluation Committees by Field of Knowledge or Follow-up Committee, and final reports produced by the Programmes and Institutions Evaluation Committees. As explained earlier, all members of review panels and the Evaluation Committees contribute to reports, and students, in particular, appreciate that their voice is heard and their inputs reflected in reports (see ESG 2.4). The Committees redraft review panels' detailed initial reports to make them more concise and ensure that they are consistent in terms of the approach to the criteria and the language, while keeping their core content and panel judgments. The technical team provides support in the review of reports to ensure that reports contain no errors in the interpretation of the criteria and the text is clear and accessible. Drafts of final reports are forwarded to the institutions under review for a factual accuracy check and feedback. (SAR; Evaluation protocols and guides; Meetings with the Evaluation Committees, staff and reviewers)

ACPUA publishes on its website all final evaluation reports produced by the Evaluation Committees, including those where an evaluation ends with a negative outcome. A search engine on the website allows reports to be accessed by evaluation process, HEI, faculty / school / centre, field of study, degree, publication year and report title. Additionally, ACPUA uploads its final reports onto the DEQAR portal managed by EQAR. (SAR)

To address the 2016 review recommendation, ACPUA put in place in 2018 the above-mentioned mechanism for scrutinising final reports to be published. It has also recently adopted some basic rules to be followed for consistency in reporting. The rationale for scoring must be clear and judgments duly substantiated, and formal phrases are not sufficient to describe the outcome of an evaluation. The Evaluation Committees producing final reports should provide feedback to review panels, and meta-evaluations should ensure more efficient communication between the different Committees.

The representatives of reviewed HEIs whom the panel met were unanimous in commending ACPUA for thoroughness in its evaluations and clear guidelines in final reports on what would still need to be improved. They also appreciate the opportunity to check the factual accuracy of reports and provide feedback on completed evaluations.

Analysis

The panel confirms that evaluation reports, including those with unfavourable decisions, are published on the ACPUA website, as well as on the DEQAR portal. The panel has examined a sample of reports for all fully implemented evaluation processes (provided by ACPUA and downloaded from its website) and finds them clear and accessible. Reports are intended primarily for the academic community, and the panel had no way of finding out to what extent they are read by, and readable to, a wider audience and, in particular, prospective students. However, the students interviewed consider that reports are clear and useful. The panel also understands from the discussions with the Director that in response to suggestions from external stakeholders, ACPUA will now move away from a formalistic approach towards a stronger focus on issues particularly relevant to student competences and employability, which would make evaluation reports more useful to prospective students and employers.

Reports have a predefined and clear structure. While all include a description of the procedure, with details on the Committee or the review panel involved, and conclusions or the final outcome, the extent to which, and the way in which, they cover the other elements highlighted under this ESG, including evidence, analysis and findings, good practices and recommendations, vary between evaluation processes.

The panel is aware that initial programme accreditation serves mainly the purpose of ensuring compliance with the national requirements, and that the scope of reports is largely determined by the national legislation. The panel notes, however, that reports provide only a briefly expressed judgment rather than an analysis per criterion, and no or little evidence to underpin findings. Recommendations are included where appropriate. Programme follow-up reports clearly acknowledge the progress made and indicate areas for further improvement; this is sufficient considering that the process is actually an integral part of programme (re)accreditation. Programme reaccreditation reports include a detailed analysis based on sufficient evidence to substantiate judgements, and good practices, strengths, weaknesses and related recommendations.

IQAS certification reports contain evidence and analysis, strengths, areas for special follow-up and related recommendations. They are somewhat uneven in quality, with an in-depth analysis and judgments well substantiated by evidence under most criteria, and only some broad statements under other criteria (for example, that procedures are in place to promote SCL), for which little evidence is provided. Initial institutional accreditation is a specific process, based on programme reaccreditation and IQAS certification, which is not a quality evaluation in its own right but involves verification of the

data and validity of the documents supporting these two processes. Thus, reports could not be expected to include the same kind of evidence, analysis or findings, good practices or recommendations as in other processes. The panel confirms that the reports examined demonstrate a thorough analysis of the documents, with clearly highlighted process-specific strong and weak points.

The partner HEI evaluation report and the HEI initial accreditation reports examined contain sufficient evidence to underpin a detailed analysis and findings. Although the latter do not separately provide strengths, areas for improvement and recommendations, these can be found in the analysis. As training school accreditation and teaching staff evaluation system audit are both very specific processes (see 'Introduction' and ESG 2.1 and 2.2), reports could not be expected to identify good practices or make recommendations similar to those in other processes. The panel confirms that the reports examined include detailed evidence, analysis and findings, with clearly identified process-specific strong and weak points where appropriate.

Finally, DOCENTIA reports include overall findings supported by an overview of areas for improvement and recommendations, and clear and well-substantiated suggestions for improvement for each criterion.

No reports are available as yet for institutional follow-up, joint programme review and ALCAEUS as the processes are not fully developed or implemented yet.

The panel notes that ACPUA has in place the good practice of sending reports for a factual accuracy check and feedback to reviewed HEIs. The panel found no evidence in the discussions with the representatives of HEIs that factual inaccuracy is an issue that would need to be addressed.

To implement the 2016 review recommendation, ACPUA has put in place a sound mechanism for scrutinising final reports, which involves the Evaluation Committees and technical staff. Based on the analysis of two or three reports per evaluation process (except for partner HEI evaluation where the most recent one was produced in 2014), the panel considers that there is a high level of consistency between reports produced in a given process. As indicated above, there is still room for improvement in terms of the depth of analysis and how analysis and findings are underpinned by evidence, in particular, in initial programme accreditation reports. In this context, the panel agrees with ACPUA that the feedback loop between its Committees and panels has yet to be closed; this is addressed by the recommendation under ESG 3.6.

The panel understands that the Evaluation Committees' role is to ensure that the original review panel reports are concise and consistent and that any changes made by the Committees are in language rather than judgement. That said, where the full reviewer reports are richer in content than the final reports of the Committees, the panel feels that they could be published together with the final reports.

Panel recommendations

The panel recommends that ACPUA continue its efforts to ensure that reports in all evaluation processes provide sufficient evidence and analysis to substantiate judgments, and that report writing for the new processes follow best practice. For a related recommendation on feedback to be provided to review panels, see ESG 3.6.

Panel suggestions for further improvement

Where the full review panel reports contain more valuable information than final reports produced by the Evaluation Committees, the panel encourages ACPUA to consider publishing them along with final reports of the Committees which are currently on its website.

Panel conclusion: substantially 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.

2016 review recommendation: The panel recommends that ACPUA pays attention to the actual implementation of the mechanism of appeals and its adequacy and effectiveness, namely regarding the time for processes to be analysed, and the formal and substantive fairness achieved. The panel encourages ACPUA to promote as far as possible the use of the internal appeal procedures before external judicial procedures can be started, for the sake of speed and greater collaboration with higher education institutions.

Evidence

As a public law entity, ACPUA is required to conduct its activities in accordance with the 2015 Administrative Procedure Act, which guarantees the rights of citizens, including the right to lodge appeals, complaints and claims. The Act has also allowed the agency to streamline its processes through e-governance tools. The Higher Education Act requires that ACPUA's complaints and appeals processes be clearly defined as part of all evaluation protocols and appropriately reported to the interested parties. Appeals, complaints and claims are considered by the agency's Appeals Committee. The processes are governed by the *Procedure for handling complaints and appeals* and the *Rules of Procedure of the Appeals Committee*. (Legislation; SAR; Internal regulations)

Information about the possibility of filing appeals, complaints and claims and the related internal regulations are published on the ACPUA website. The documents accompanying the evaluation processes have recently been amended to include explicit information for HEIs about the possibility to appeal. The website also contains an online form for filing complains and claims. (SAR; Meeting with the Appeals Committee; ACPUA website)

HEIs may appeal against any decision taken in an EQA process by ACPUA or the competent national or regional bodies (for the bodies concerned, see ESG 2.5). Where ACPUA takes the final decision, HEIs can challenge not only the outcome of an evaluation, but also, for example, a decision appointing a review panel. An appeal against the outcome of an evaluation can be filed either through an internal procedure within the agency, involving its Appeals Committee, or through a contentious administrative procedure in a court. In the former case, HEIs file an appeal within one month of the receipt of the final evaluation report produced by the Evaluation Committee. Where final decisions on evaluation outcomes are taken by the competent national or regional body, HEIs lodge appeals with that body. If an appeal is considered favourably, the body usually instructs an agency to conduct another evaluation. If an appeal is dismissed, an HEI may file an appeal with a court.

Complaints may address a delay, negligence or minor irregularities in daily activities of the agency; claims express dissatisfaction with the conduct of an evaluation or the performance of reviewers. Claims and complaints lead to follow-up action as part of ACPUA's IQA system. For example, acting on a complaint about the use of non-inclusive or gender insensitive language in an evaluation report, the steps taken by ACPUA led to the inclusion of gender equality and sexual diversity in its Strategic Plan, with a gender perspective to be reflected in its evaluation processes (SAR) (see also ESG 3.6).

The Appeals Committee should consist of at least three experts (at least two with a legal background); currently, it has six members, including national academic experts, an international expert and a PhD student. None of them may be based in Aragon or sit on any other ACPUA body. The involvement of an international expert and a student, who bring in a comparative perspective and a less legalistic approach, is a recent development, highlighted in the SAR as very innovative in Spain.

The Committee has 30 days to consider an appeal, complaint or claim. It analyses the dossier but may also request additional information or opinions from the parties concerned. In the case of appeals, it examines whether the evaluation procedure has been conducted correctly and the outcome of an evaluation is substantiated. (SAR; Internal regulations; Meeting with the Appeals Committee).

Around ten appeals per year are now filed with ACPUA, all regarding evaluations of junior academic staff research activity which fall outside the scope of the ESG. In these cases, the Committee has considered appeals within a few days as a formal response should be given within a month. The above-mentioned case of the use of gender-insensitive language was the only one that the Committee could give as an example of recently considered complaints. In purely legal terms, the case could not even be regarded as a complaint as the university concerned merely pointed in its feedback letter on the evaluation report that there was a certain lack of sensitivity to the need to use inclusive language.

ACPUA considers that the Appeals Committee has demonstrated its diligence and effectiveness over the last years. It has contributed to quality improvement in the agency's activities by making recommendations to the responsible bodies as regards the substantiation of judgments and consistency in evaluation reports. As demonstrated by no appeals filed with a court since 2016, the Committee's work has encouraged HEIs to use the internal procedure as giving more consideration to the rights of institutions and individuals. (SAR; Meeting with the Appeals Committee)

Analysis

The panel confirms that the information about the possibility of lodging an appeal and complaint and the related regulations are easily accessible on the ACPUA website. It is clear to the panel from the discussions with the representatives of HEIs that they are fully satisfied with the information provided by the agency. The appeals and complaints procedures are transparent and explained in detail in the agency's documents.

The panel finds that the agency has put in place an independent committee to adjudicate on complaints and appeals. There is a clear separation between the Appeals Committee and the bodies that are directly involved in taking decisions in evaluation processes. The panel also notes that findings from the cases considered by the Appeals Committee lead to improvements in the work of the evaluation bodies and other areas of the agency's activity.

The panel considers that despite very few opportunities to do so, the Appeals Committee has demonstrated its adequacy and effectiveness since the 2016 review. It is clear from the SAR and from the discussions with the members of the Appeals Committee that to date there have been very few cases of evaluation processes being the subject of their deliberations, which have largely been concerned with appeals from individual researcher assessments that are not part of this review process. As such cases were handled speedily, the panel is confident that the Committee will consider with the same high efficiency any appeals that might be lodged in the future in the processes which fall within the ESG. It is also evident that the timeframe set in the regulations for the Committee's decisions makes the agency's internal appeals process much more efficient than proceedings in a court. The fact that no appeal has been filed with a court since 2016 also demonstrates that the procedure in place ensures impartiality and fairness.

The agency has received even fewer complaints in recent years. The panel understands from the discussions with the representatives of HEIs that they can resolve any possible issues with the agency via its feedback mechanisms in a more amicable way than by filing a formal complaint. Nonetheless, the panel would recommend that the Committee develop a specific protocol about how they would handle any complaint relating to the agency's Code of Ethics, in advance of any future complaint that might be brought to its attention. This is addressed by the recommendation under ESG 3.6.

Panel conclusion: fully compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1: The panel commends ACPUA for developing ALCAEUS as a pioneering evaluation scheme focused on the UN Sustainable Development Goals, which aims to enhance the social dimension of higher education in Aragon.

The panel commends ACPUA for ensuring extensive and meaningful involvement of all stakeholders, including students and professional and social partners, as well as international experts, in its governance and external quality assurance processes.

ESG 3.5: The panel commends ACPUA for the professionalism of its staff and their passionate commitment to work which is highly valued by its stakeholders.

The panel commends ACPUA for the significant increase in the funding allocated to development work.

ESG 3.6: The panel commends ACPUA for its responsiveness to the feedback collected from stakeholders in a continuous effort to enhance its policies, structures and procedures.

The panel commends ACPUA for its efforts to ensure that the principles of tolerance, non-discrimination, equality and gender balance feature prominently in its policy and practice.

ESG 2.2: The panel commends ACPUA for involving extensively all stakeholders in the design of its evaluation methodologies, and for seeking regularly and integrating their inputs in continuous improvement of its processes.

ESG 2.4: The panel commends ACPUA for involving international experts in all programme reaccreditation reviews.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

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

The panel finds ACPUA to be:
-   fully compliant with ESG 3.1, 3.2, 3.3, 3.5, 3.7, and 2.2, 2.3. 2.4, 2.5 and 2.7;
-   substantially compliant with ESG 3.4, 3.6, and 2.1 and 2.6.

The panel provides recommendations for the agency to achieve full compliance with ESG 3.4. 3.6, 2.1 and 2.6.

ESG 3.4: The panel recommends that ACPUA develop a more systematic and deeper approach to the analysis of findings from its evaluation processes, and expand its research activities to provide reports that discuss trends and developments at the level of the Aragon higher education system.

ESG 3.6: The panel recommends that ACPUA bridge the gaps in its internal quality assurance system by closing the feedback loops between its evaluation bodies and reviewers, and by putting in place a procedure to deal with breaches of its Code of Ethics that might occur in the future.

ESG 2.1: The panel recommends that ACPUA develop a coherent approach to address more explicitly student-centred learning, teaching and assessment in its evaluation methodologies, and pay special attention to these issues in its training for reviewers.

ESG 2.6: The panel recommends that ACPUA continue its efforts to ensure that reports in all evaluation processes provide sufficient evidence and analysis to substantiate judgments, and that report writing for the new processes follow best practice. For a related recommendation on feedback to be provided to review panels, see ESG 3.6.

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel provides some suggestions, extending beyond a strict interpretation of the standards, that ACPUA may wish to consider when reflecting on its further development. These have already been signalled in the previous sections.

ESG 3.5: The panel suggests that ACPUA allocate any possible further financial resources in the coming years to the commission of further development work. The agency may also consider applying for EU project grants for its development work in collaboration with other national and international agencies.

ESG 3.6: The panel encourages ACPUA to consider the value and feasibility of publishing periodically more systematic and deeper analyses of overall findings from its meta-evaluations and satisfaction surveys.

ESG 2.1: ACPUA could consider how some aspects highlighted in the guidelines to Part 1 ESG, such as stakeholder involvement in internal quality assurance, could be more explicitly addressed in its evaluation methodology, in particular, for programme reaccreditation.

The panel also encourages ACPUA to initiate discussions within REACU with a view to developing a common approach to addressing student-centred learning, teaching and assessment in external quality assurance processes.

ESG 2.2 (also relevant to ESG 2.1 and 2.3): The panel suggests that ACPUA prioritise the development of a methodology for institutional follow-up accreditation geared towards supporting university centres in quality enhancement and thus enhancing the overall fitness-for-purpose of the institutional accreditation system, and a methodology for joint programme review consistent with the European Approach for Quality Assurance of Joint Programmes.

ESG 2.3: The panel encourages ACPUA to consider conducting a site visit as part of initial accreditation reviews of programmes designed by centres which have not yet successfully undergone an IQAS certification review.

Further to the suggestion under ESG 2.2, the panel encourages ACPUA to pursue vigorously its efforts to design methodologies for the new processes based on the four stages as recommended under ESG 2.3.

ESG 2.4: As ACPUA is refocusing its activities towards institutional accreditation, the panel encourages it to consider involving international experts in IQAS certification reviews.

ESG 2.6: Where the full review panel reports contain more valuable information than final reports produced by the Evaluation Committees, the panel encourages ACPUA to consider publishing them along with final reports of the Committees which are currently on its website.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

18 NOVEMBER 2020 (WEDNESDAY)		
TIMING	**TOPIC**	**PERSONS FOR INTERVIEW**
12.45-13.00	*Checking the stability of internet connection (review coordinator and the agency's contact person)*	**Eva SANCHEZ** (Liaison person)
13.00-15.00	Review panel's kick-off meeting and preparations for day I	
15.00-17.00	A pre-visit meeting with the ACPUA Director and / or liaison person to clarify elements related to the overall system and context and to collect / check any additional or missing information.	**Antonio SERRANO** (Director) **Eva SANCHEZ** (Liaison person) **Isabel ORTEGA** (Technical Staff Coordinator)
25 NOVEMBER 2020 (WEDNESDAY)		
TIMING	**TOPIC**	**PERSONS FOR INTERVIEW**
8.45-9.00	*Connection set-up*	
9.00-9.30	Review panel's private meeting	
9.30-9.45	*Connection set-up*	
9.45-10.30	Meeting with the ACPUA Director	**Antonio SERRANO** (Director)
10.30-10.45	*Connection set-up*	
10.45-11.30	Meeting with the ACPUA SAR Steering Group and Internal Quality Assurance Committee	**Nacho LOZANO** (QA Technician, Teaching and Learning) **Isabel ORTEGA** (Technical Staff Coordinator) **Eva SANCHEZ** (Liaison person) **Antonio SERRANO** (Director)
11.30-12.00	Review panel's private discussion *(and connection set-up for the coordinator)*	
12.00-12.45	Meeting with the ACPUA Board of Directors	**José Antonio MAYORAL** (Rector U. Zaragoza) **María Berta SAEZ** (Rector U. San Jorge) **Eva FERREIRA (**U. País Vasco & Member of Committee of Experts) **Josefina JIMENEZ** (Representative of UGT trade union) **Ana DEHESA (**Representative of CEOE, Confederation of employers and industries)

12.45-13.15	Review panel's private discussion (and connection set-up for the coordinator)	
13.15-14.15	Lunch break	
14.15-15.15	Review panel's private discussion	
15.15-16.00	Meeting with the ACPUA Evaluation Committees: Programmes Evaluation Committee (SET), Institutions Evaluation Committee (SEC), Evaluation Committees by Field of Knowledge and PhD (CERs), and Follow-Up Committee	**Jordi SURIÑACH** (U. Barcelona & Chair of SET) **Irene MELCHOR** (Teacher of Secondary Education & Member of SET) **José Ángel DOMINGUEZ** (U. Salamanca & Chair of SEC) **Berta FERNANDEZ** (Senior Policy Officer Quality, U. Leiden, The Netherlands & Member SEC) **Gloria ZABALLA** (Quality Director U. Deusto & Member of SEC) **Celso RODRIGUEZ** (U. Santiago de Compostela & Chair of CER Sciences) **Julio POLO** (U. Cantabria & Chair of Follow-up Committee)
16.00-16.30	Review panel's private discussion *(and connection set-up for the coordinator)*	
16.30-17.15	Meeting with the ACPUA Commission of Evaluation, Certification and Accreditation (CECA) and Committee of Experts	**Laurent MAYALI** (Berkeley Law, U. California, USA & Chair of the Committee of Experts) **Carlos MARTIN** (TB vaccine leading researcher, U. Zaragoza & Member of Committee of Experts) **Leonor GONZALEZ** (U. La Rioja & Member of CECA) **Francisco GRACIA** (U. Córdoba & Member of CECA) **Teresa SANCHEZ** (Politechnic University of Madrid, QA expert & Member of CECA) **Erika SOBOLEVA** (Director of AKKORK & Member of CECA)
17.15-17.45	Review panel's private discussion *(and connection set-up for the coordinator)*	
17.45-18.30	Meeting with the ACPUA Appeals Committee	**Gabriel MORALES** (State Lawyer, Member of the Aragon Advisory Council & Chair of the Appeals Committee) **Manuel CACHON** (Faculty of Law, U. Autònoma Barcelona) **Cosimo CASCIONE** (Faculty of Law, U. Napoli "Federico II", Italy) **Patricia CIFREDO** (Ph. D. Student, Faculty of Law, U. Sevilla) **Carmen OCAL** (ICMAB – Institute of Material Sciences of Barcelona) **Cristina RODRIGUEZ** (Faculty of Law, U. Rey Juan Carlos Madrid)
	Break	
As necessary *(an evening session)*	Wrap-up meeting among panel members and preparations for day II	

26 NOVEMBER 2020 (THURSDAY)		
TIMING	TOPIC	PERSONS FOR INTERVIEW
8.45-9.00	*Connection set-up*	
9.00-9.30	Review panel private meeting	
9.30-9.45	*Connection set-up*	
9.45-10.30	Meeting with the ACPUA staff	**Esteban BLASCO** (Administration Manager) **Ana CLEMENTE** (Administration Assistant) **Nacho LOZANO** (QA Technician, teaching and learning) **Natalia MARTINEZ** (QA Technician, research, innovation and prospective) **Isabel ORTEGA** (Technical Staff Coordinator) **Eva SANCHEZ** (QA Technician, internationalisation)
10.30-11.00	Review panel's private discussion *(and connection set-up for the coordinator)*	
11.00-11.45	Meeting with heads of reviewed higher education institutions (including partner institutions)	**Cristina ACIN** (Vice-dean of the Faculty of Veterinary, U. Zaragoza) **Fernando COCA** (Dean of the Faculty of Communication and Social Sciences, U. San Jorge) **Francisco José GOMEZ** (Director of the CUD – University Center of Defense, U. Zaragoza partner) **Carmen PEREZ-LLANTADA** (Director for Teaching Quality and Innovation Secretariat, U. Zaragoza) **Inmaculada PLAZA** (Director of the University Politechnical School, campus Teruel, U. Zaragoza) **Eliseo SERRANO** (Dean until Nov. 2020 of the Faculty of Philosophy and Letters, U. Zaragoza) **José Antonio YAGÜE** (Director of the School of Engineering and Architecture, U. Zaragoza)
11.45-12.15	Review panel's private discussion *(and connection set-up for the coordinator)*	
12.15-13.00	Meeting with quality assurance officers of higher education institutions	**Cristina BELLOSO** (EUPLA, U. Zaragoza partner) **Juan Carlos BUSTAMANTE** (Faculty of Education, U. Zaragoza) **Dolores CEPERO** (EPS – The Technological College of Huesca, U. Zaragoza) **Alberto MARTIN** (Quality Area, U. San Jorge) **Belén PINA** (Quality and Improvement Area, U. Zaragoza)
13.00-14.00	*Lunch break*	
14.00-15.00	*Review panel's private discussion (and connection set-up for the coordinator)*	

15.00-15.45	Meeting with representatives of the ACPUA Pool of Reviewers: representatives of all groups of external experts (academic and international experts, external stakeholders and students)	**Belén FLORIANO** (U. Pablo Olavide, Sevilla / *institutional accreditation*) **Pilar GOMEZ** (U. Complutense de Madrid / *study programme accreditation*) **Francisco JIMENEZ** (Student, Politechnic U. Cartagena / *institutional accreditation*) **Clara MATEO** (practitioner, CreAcademia / *study programme accreditation*) **Bienvenido SAEZ** (QA expert, CONEAUPA, Panamá & Member of Follow-up Committee) **Alexander SAUER** (managing director of Enerparc Int AG, Hamburg, Germany / *study programme accreditation*)
15.45-16.15	Review panel's private discussion *(and connection set-up for the coordinator)*	
16.15-17.00	Meeting with stakeholders: social and business partners involved in ACPUA's governance and activities, incl. the ACPUA + Society Programme	**Maribel CAMPO** (U. Salamanca, coordinator of the project "University Training in Design for All" from ONCE Foundation/CRUE/Spanish Government) **Patricia ESPEJO** (UCLM, feminist platform 1,2,3 Educafem & Member of CECA) **Enrique INIESTA** (Head of Human Resources Development, Pikolin Group) **Marta FONOLLEDA** (Director AQUA, Andorra) **Ignacio PEMAN** (European Council of Spatial Planners ECTP-CEU / *INQAAHE project about the SDG, ALCAEUS*) **Luis POLO** (Coordinator of the Business Cooperation Area, Spanish Red Cross & Member of CECA / *ACPUA+Sociedad programme*) **Máximo VALENCIANO** (President of Inycom & Member of the Committee of Experts)
17.00-17.30	Review panel's private discussion *(and connection set-up for the coordinator)*	
17.30-18.15	Meeting with stakeholders: students involved in ACPUA's governance and activities and the ACPUA + Students Programme	**Beatriz ATIENZA** (Student, U. Valencia & Member of SET) **María Jesús BLANCO** (Student, U. Pablo Olavide, Sevilla & Member of SEC) **Rubén ESCUSOL** (Representative of Students, U. Zaragoza & Member of Board of Directors) **Manuel MAS** (Representative of Students, U. San Jorge & Member of Board of Directors) **Laura PEIRO** (Student, U. Zaragoza) **Diego SANCHEZ** (Student, U. Complutense Madrid & Member of CER Sciences)
	Break	
As necessary (an evening session)	Wrap-up meeting among panel members: preparation for day III and provisional conclusions	

27 NOVEMBER 2020 (FRIDAY)		
TIMING	TOPIC	PERSONS FOR INTERVIEW
8,45-9.00	*Connection set-up*	
9.00-9.45	Meeting with representatives of the Government and Parliament of Aragon	**Maru DIAZ** (Minister of Science, Higher Education and Knowledge Society, Government of Aragon & President of the ACPUA´s Board of Directors) **Ramón GUIRADO** (Aragon General Director for Higher Education, Government of Aragon & Vice-president of the ACPUA´s Board of Directors) **Itxaso CABRERA (**MP Aragon, Parliamentary Committee for Sciences and Higher Education, Cortes de Aragón)
9.45-10.45	Meeting among panel members to agree on final issues to clarify	
10.45-11.00	*Connection set-up*	
11.00-12.00	Meeting with the ACPUA Director and resource person to clarify any pending issues	**Antonio SERRANO** (Director) **Eva SANCHEZ** (Liaison person) **Isabel ORTEGA** (Technical Staff Coordinator)
12.00-13.30	Private meeting among panel members to agree on the main findings	
13.30-14.30	*Lunch break (and connection set-up for the coordinator)*	
14.30-15.30	Final de-briefing meeting with the ACPUA Management and key staff to inform about the panel's preliminary findings	**ACPUA team**

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) by the European Association for Quality Assurance in Higher Education (ENQA)

TERMS OF REFERENCE

April 2020

1. Background and context

ACPUA is a public body that was created in 2005 and started operating in 2006. Since its foundation by Law of the Aragon Parliament, the Agency is the main instrument in the region for the assurance and promotion of quality in higher education. According to the law, the purpose of Agency is double: an evaluation, certification and accreditation mission, as well as the promotion of continuous enhancement, reflection and innovation in the university system. While its main activities focus on Aragon, the Agency is also active at national (Spanish) and international level.

ACPUA performs its functions objectively, impartially and independently, recognised and guaranteed by law. It is governed by its own bylaws, approved in 2006 (Decree 239/2006, of 4 December).

ACPUA mainly develops technical quality assurance activities, such as evaluation, assessment, certification and accreditation. This public service is complemented with strategic foresight and research, as well as with activities to promote a culture of quality in higher education within the region. Consequently, the ACPUA activities can be classified in three main areas:

- Quality assurance evaluations and reviews: programmes, institutions and research. In the last four years new evaluations tasks have been strongly developed within each of these areas (e.g. programme initial accreditation, since 2107; institutional accreditation, since 2018; certification ODS/Agenda 2030, since 2020).
- Strategic foresight activities through the production of reports to support higher education policy decisions upon request of the Aragon Government, as well as research and prospective studies.
- Outreach activities for the promotion of quality culture and internationalization in higher education (notably through seminars, networks and events).

A cross-cutting concern in all ACPUA activities is the development of links between university, institutional decision-making bodies, sustainable productive areas and society. Following recommendations of the ENQA review of ACPUA carried out in 2016, the Agency has increased the stakeholder participation in its work. ACPUA wants to build up its strength. The new Strategic Plan (2019-2022) provides a roadmap to implement collaborative networks (not only with other national and international university systems, but also with other educational levels) and exchanges with stakeholders committed with the future of higher education in Europe.

ACPUA has been a member of ENQA since 2016 and is applying for ENQA renewal of membership.

ACPUA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2016 and is applying for renewal of EQAR registration.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which ACPUA fulfils the requirements of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will provide information to the Board of ENQA to aid its consideration of whether membership of ACPUA should be reconfirmed and to EQAR to support ACPUA application to the register.

2.1 Activities of ACPUA within the scope of the ESG

In order for ACPUA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of ACPUA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary.

The following activities of ACPUA have to be addressed in the external review:

- Study programme initial accreditation including:
    - Study programme modification
    - Ex-ante evaluation of master programmes in the arts
    - Joint Programme review
- Study programme accreditation
- Study programme follow-up
- Training schools accreditation
- Higher education institutions initial accreditation
- Teaching activity evaluation system audit (DOCENTIA Programme)
- Teaching staff evaluation system audit
- Partner higher education evaluation
- IQAS Certification (PACE SGIC)
- Institutional accreditation
- Follow-up accreditation*
- Certification ODS/Agenda 2030 (ALCAEUS Programme)*.

Important note: The activities marked with asterisk (*) have not yet been fully implemented. These activities should be addressed as far as they can, based on the stage of development at the time of ACPUA's review.

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 evaluation procedure consists of the following steps:

- Formulation of the draft Terms of Reference for the review;
- Finalising the Terms of Reference for the review following EQAR's Eligibility Confirmation (if relevant);
- Nomination and appointment of the review panel;
- Self-assessment by ACPUA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ACPUA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the Board of ENQA and their decision regarding ENQA membership;
- Follow-up of the panel's and/or the Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

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 eventually a labour market representative (if requested). One of the members will serve 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 under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

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

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

ENQA will provide ACPUA with the list of suggested experts and their respective curricula vitarum to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the ACPUA review.

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

ACPUA is responsible for the execution and organisation of its own self-assessment process and shall take into account 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 broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which ACPUA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny 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 whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case 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 reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months 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 shall be given to ACPUA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by ACPUA in arriving in Zaragoza, Spain.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each ESG. A draft will first be submitted to the ENQA review coordinator who will check the report for consistency, clarity and language, and it will be then submitted to ACPUA usually within 10 weeks of the site visit for comment on factual accuracy. If ACPUA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by ACPUA and finalise and submit the document to ENQA.

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

When preparing the report, the review panel should also bear in mind the EQAR Policy on the Use and Interpretation of the ESG to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

For the purpose of applying for ENQA membership, ACPUA is also requested to provide a letter addressed to the Board of ENQA outlining its motivation for applying for membership and the ways in which ACPUA expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board of ENQA together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

ACPUA will receive the expert panel's report and publish it on its website once the Board of ENQA has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the Board. ACPUA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the Board of ENQA within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to ACPUA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

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

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether ACPUA is in compliance with the ESG and can thus be admitted/reconfirmed as a member of ENQA. The report can also be used for registration on EQAR, and is designed to serve these two purposes. However, the review report is to be considered final only after being approved by the Board. Once submitted to ENQA and until it is approved by the Board, the report may not be used or relied upon by ACPUA, the panel, or any third party and may not be disclosed without the prior written consent

of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

6. Budget

ACPUA shall pay the review related fees as specified in the contract between ENQA and ACPUA.

It is understood that the fee of the progress visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the board of ENQA and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as the travel and subsistence costs related to the second site visit will be charged to the agency.

7. Indicative schedule of the review

Agreement on terms of reference	April 2020
Appointment of review panel members	May 2020
Self-assessment completed	31 July 2020
Pre-screening of SAR by ENQA coordinator	End-August 2020
Preparation of site visit schedule and indicative timetable	September 2020
Briefing of review panel members	October 2020
Review panel site visit	Second half of November 2020
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	End-January 2021
Draft of evaluation report to ACPUA	February 2021
Statement of ACPUA to review panel if necessary	March 2021
Submission of final report to ENQA	April 2021
Consideration of the report by Board of ENQA	June 2021
Publication of report	July 2021

Annex 3: Glossary

ACPUA	Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education
ANECA	National Agency for Quality Assessment and Accreditation
CECA	ACPUA Commission of Evaluation, Certification and Accreditation
CERs	ACPUA Evaluation Committees by Field of Knowledge and PhD
CGPU	General Conference on University Policy
CURSA	University Commission for the Regulation of Follow-up and Renewal of Accreditation
DEQAR	Database of External Quality Assurance Results (managed by EQAR)
ECA	European Consortium for Accreditation
ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
EQAR	European Quality Assurance Register for Higher Education
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015*
HE	higher education
HEI	higher education institution
INQAAHE	International Network for Quality Assurance in Higher Education
IQA	internal quality assurance
IQAS	internal quality assurance system
QA	quality assurance
REACU	Spanish Network of Higher Education Quality Assurance Agencies
SAR	self-assessment report
SDGs	UN Sustainable Development Goals
SEC	ACPUA Institutions Evaluation Committee
SET	ACPUA Programmes Evaluation Committee
ToR	Terms of Reference

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ACPUA AND REQUESTED BY THE PANEL

ACPUA's Self-Assessment Report and its annexes, including the Strategic Plan and the Reviewer Selection Procedure

Aragon Higher Education Act

ACPUA internal regulations and documents:

- Procedure for the processing of appeals, complaints and claims
- Regulations on the functioning of the Appeals Committee
- Evaluation protocols and guides for all of the evaluation processes which were available at the time of the review

ACPUA Evaluation reports for all evaluation processes which are in place

REACU agreement for ex-ante (verification) and ex-post (renewal of accreditation) accreditation of joint official European inter-university qualifications

Thematic analyses:

- Findings on the programmes renewal accreditation on the university system of Aragon in 2015
- Results of the evaluation for the renewal of the accreditation of programmes in the university system of Aragon in 2015
- ACPUA and change management in the university system of Aragon: from recommendations to good practice
- Technical analysis for the Government of Aragon on the results of the evaluations carried out on the university system of Aragon (2016-2020)
- Analysis of low-demand programmes in the university system of Aragon
- Guide for the Management of Transversal Competences according to the SDG in the higher education
- Materials based on a survey on labour market insertion of graduates of the Aragon university system

OTHER SOURCES USED BY THE REVIEW PANEL

- Royal Decrees 1393/2007 and 420/2015
- Decree 239/2006 of the Government of Aragon of 4 December 2006 approving ACPUA's Statutes
- ACPUA website: information on the agency's transversal programmes (ACPUA+Society, ACPUA+Students, ACPUA+International)
- ANECA website: ANECA 2018 Report on External Quality Assurance in Higher Education in Spain (a summary in English), based on contributions from REACU agencies, including ACPUA

ENQA AGENCY
REVIEW 2021

THIS REPORT presents findings of the ENQA Agency Review
of the Aragon Agency for Quality Assurance and Strategic
Foresight in Higher Education (ACPUA), undertaken in 2020.