

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

Register Committee
15/10/2021

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Ver. 1.0
Date 2021-10-15
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Application of:	05/06/2020
Agency registered since:	03/12/2016
External review report of:	24/06/2021
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Padraig Walsh (chair), Ewa Kolanowska (secretary), Carmen Fenoll, Aleksandar Šušnjar (student)
Decision of:	15/10/2021
Registration until:	31/08/2021
Absented themselves from decision-making:	Aleksandar Šušnjar
Attachments:	<ol style="list-style-type: none">1. Minutes of Telephone Conversation in regard to confirmation of eligibility, 29/06/20212. Confirmation of eligibility, 03/07/20203. External Review Report (separate file), 24/06/20214. Clarification request to the Review Panel, 14/09/215. Response to clarification request by the Review Panel, 22/09/21

1. The application of 05/06/2020 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 03/07/2020 having considered clarification received from the agency on 26/06/2020.
3. The Register Committee considered the external review report of 24/06/2021 on the compliance of ACPUA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

4. The Register Committee sought and received clarification from the chair of the review panel on 14/09/21.

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Analysis:

5. In considering ACPUA's compliance with the ESG, the Register Committee took into account the following activities:

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- *Study programme initial accreditation (including Study programme modification, Ex-ante evaluation of master programmes in the arts and 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*
- *QAS Certification (PACE SGIC)*
- *Institutional Accreditation*
- *Follow-up Accreditation*
- *Certification ODS/Agenda 2030 (ALCAEUS Programme).*

6. *Junior academic staff research activity evaluation, Strategic foresight studies / surveys, Consultancy: support to decision making process, University research institutes initial accreditation & accreditation* are not within the scope of the ESG and, thus, not pertinent to the application for renewal of registration.

7. The Register Committee found that the report provides sufficient evidence and analysis on ACPUA's level of compliance with the ESG.

8. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.4 – Peer-review experts

9. ACPUA involves diverse groups of stakeholders in its panels. The agency includes students in all activities except in the HEI initial accreditation reviews and partner HEI evaluations.

10. The Register Committee learned that the absence of student members in the panels in the two activities is due to the specificity of the processes; the procedures focus on quantitative indicators on teaching offering and the human, material and financial resources.

11. The Committee, however, understood that the process goes beyond a purely technical check of numbers, as it generally involves other experts also making a qualitative assessment. The Committee could not agree with the panel's conclusion that the "student perspective could not add any value" in those procedures and considered that the students' views could offer an important insight into the matters under observation in both activities.

12. **As ACPUA is not involving students' perspective in some of its activities the Register Committee was unable to concur with the panel's conclusion, but found the agency to be partially compliant with the standard.**

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ESG 2.6 – Reporting

13. ACPUA distinguishes two types of reports: full reports and final reports, written by separate bodies. The panel noted that the agency only publishes the final reports, even though the full reports can be richer content wise.

14. The Committee sought further clarification from the panel on the substantial difference in the content presented in both types of reports. The Register Committee learned that the information presented in the final reports matches the one in the full reports; they only differed in language and depth, rather than in judgement. In the panel's view, the full reports were aimed at audiences with more technical knowledge in quality assurance.

15. **While the Register Committee was able to concur with the panel's conclusion on the standard given that the final reports lack no substantial information, it underlined that the agency should consider publishing the full reports along with the final reports when they are richer in content.**

ESG 3.3 – Independence

16. The agency's structure entails a complex system of decision-making and governance bodies that involve a wide range of experts. The Register Committee sought further clarification on the processes for election and dismissal of members in the advisory body (i.e. Committee of Experts) and the body responsible for preparing the methodologies and procedures (i.e. the Commission for Evaluation, Certification and Accreditation).

17. The Committee learned that in the agency there is a clear division of responsibilities in regard to proposing, appointing and dismissal of committees' members that prevents conflict of interest. **The Committee was able to concur with the panel's conclusion that ACPUA complies with the standard.**

ESG 3.4 – Thematic analysis

18. ACPUA has produced several studies that elaborate on topics of interest for diverse groups of stakeholders. The thematic analyses are part

of the Strategic Plan 2019-2022 and ACPUA has increased the budget for its research activities. Additionally, the agency has hired staff dedicated to performing research and analytical activities. The Committee has learned that the agency's studies have inspired innovations among stakeholders (e.g. development of a graduate career tracking tool).

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19. The Register Committee welcomed ACPUA's efforts to introduce a more systematic approach to thematic analyses. **The Register Committee agreed with the panel's conclusion and found the agency now to be compliant with the standard.**

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ESG 3.5 – Resources

20. The Register Committee learned that ACPUA's budget has increased in the past years and that now the share of tasks and staff time is appropriate for the workload of the agency. The additional funding also led to development of the research activities (see standard 3.4). As the agency slowly shifts its focus on institutional accreditation only, it is expected that the staff team will have more time to perform activities of developmental nature.

21. While the diversification of funding is still a matter of concern, the panel noted that ACPUA has signed several contracts for external services. The Committee found this to be a positive development.

22. The Register Committee underlined the panel's views on the benefits of introducing a multi-annual budget, currently being discussed with the regional stakeholders, instead of an annual one; such an approach will enable the agency to do long-term planning and strengthen the sustainability of its processes.

23. Recognising the improvements made by ACPUA, **the Register Committee was able to concur with the panel's conclusion that ACPUA complies with the standard.**

24. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Full compliance	Compliance
2.3	Full compliance	Compliance
2.4	Full compliance	Partial compliance

2.5	Full compliance	Compliance
2.6	Substantial compliance	Compliance
2.7	Full compliance	Compliance
3.1	Full compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Substantial compliance	Compliance
3.5	Full compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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26. The Register Committee considered that ACPUA only achieved partial compliance with one standard. In its holistic judgement, the Register Committee concluded that this is a specific issue limited to two activities, and that ACPUA therefore continues to comply substantially with the ESG as a whole.

27. The Register Committee therefore renewed ACPUA's inclusion on the Register. ACPUA's renewed inclusion shall be valid until 30/06/2026¹.

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

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

Application by Aragon Agency for Quality Assessment and Accreditation (ACPUA) Renewal of Registration

Register Committee

Minutes of Telephone Conversation

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Date of the conversation:	26/06/2020
Representative of ACPUA:	Ana Isabel Ortega, Eva Sánchez, Nacho Lozano
Representative of EQAR:	Melinda Szabo

1. ACPUA has submitted on 05/06/2020 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and ACPUA's activities within the scope of the ESG, EQAR contacted ACPUA via telephone to clarify the matters below.
3. ACPUA set up a Zoom video-conversation and provided a comprehensive presentation of all its external QA activities.
4. The agency was asked to clarify the nature of activities that have not been included in ACPUA's application but are included in the agency's register entry on the EQAR website i.e. *Joint programme review, Study programme modification, Ex-ante evaluation of master programmes in the art.*
5. ACPUA explained that the missing activities are in fact part of the *study programme's initial accreditation* activity (see annexed presentation). The agency further clarified that Spain has different legislation governing the organisation of these external QA activities assessment, but that their review processes were identical to the accreditation of study programmes and thus should be considered together.
6. The agency was also asked about the newly included procedures in its application: *Certification ODS/Agenda 2030 (ALCAEUS Programme)* and *Follow-up accreditation* (at institutional level).
7. ACPUA explained that these are newly introduced procedures, that they follow predefined processes and that they concern teaching and learning within higher education, and thus are to be considered within the scope of the ESG.
8. Through the *certification ODS/Agenda 2030 (ALCAEUS Programme)* ACPUA awards a label to higher education institutions that fulfil the

Sustainable Developmental Goals set in the 2030 Agenda of the United Nations.

9. The *Follow up accreditation* is an activity in its own right that is carried out for higher education establishments that have undergone a certification for the implementation of internal quality assurance. The Follow-up accreditation is carried out once every five years and considers the reviews carried out as part of the study programme follow-up procedure.
10. The *ALCAEUS Programme* arises from the participation of ACPUA in the Project Making connections between the Institutional Evaluation and the Sustainable Development Goals (INQAAHE capacity building). The pilot programme is planned to be launched during 2020-2021.
11. The first *follow-up accreditation* process is planned to be launched in 2023, five years after the first Institutional Accreditation by ACPUA took place (2018).

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

Avda. de Ranillas nº 5 D, 1ª Planta
Eva Sánchez

50018 Zaragoza
Spain

Brussels, 7 July 2020

Confirmation of Eligibility: Application for Renewal of Registration Application no. A97 of 05/06/2020

Dear Eva,

We hereby confirm that the application by ACPUA for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by European Association for Quality Assurance of Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

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

- *Study programme initial accreditation* including
 - *Study programme modification* ⁽¹⁾
 - *Ex-ante evaluation of master programmes in the arts* ⁽²⁾
 - *Joint Programme review* ⁽³⁾

Based on the information provided we understand that these activities ^(1,2,3) are considered part of the *study programme initial accreditation* process. As they are however separate activities in themselves, they should be considered individually to the extent they differ in their methodology, criteria or process.

- *Study programme accreditation*
- *Study programme follow-up*
- *Training schools accreditation*
- *Higher education institutions initial accreditation*

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- *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)**

Following the clarification provided (see minuted conversation) we understand that ACPUA has recently set up two new activities (*). Since these (*) activities have not yet been launched, they should be considered in the self-evaluation and external review of ACPUA to the extent they are ready at the time of the review.

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

We further remind you that ACPUA was found to comply only partially with the following standards when ACPUA was admitted to the Register; the issues related thereto should be specifically addressed in your self-evaluation report and the external review report:

ESG 3.4 – Thematic Analysis

Considering the lack of a systematic approach in developing thematic analysis, the Register Committee was unable to concur with the panel's conclusion on compliance and formed the view that ACPUA only partially complies with ESG 3.4.

ESG 3.5 - Resources

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

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

- *Junior academic staff research activity evaluation*
- *Strategic foresight studies / surveys*
- *Consultancy: support to decision making process*
- *University research institutes initial accreditation & accreditation*

While these activities are not relevant to your application, it is ACPUA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

While consultancy services are activities outside the scope of the ESG, ACPUA is expected to demonstrate that adequate policies and processes are in place to prevent conflict of interest in performing its QA function and that a clear separation exists between consultancy activities provided to higher education institutions and the agency's external QA procedures (see Annex 5 of the Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies¹).

We will forward this letter to European Association for Quality Assurance of Higher Education (ENQA) in its capacity of the coordinator of the external review. At the same time we underline that it is ACPUA's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

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

Yours sincerely,

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

Colin Tück
(Director)

Cc: ENQA (coordinator)

¹ Version 2.0 of November 2017 https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf

Padraig Walsh

– by email: pwalsh@qqi.ie –

Brussels, 21 September 2021

Application by ACPUA for Renewal of Registration on EQAR

Dear Padraig Walsh,

The ACPUA - Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 24/06/2021 on which ACPUA's application is based.

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

In regards to ESG 2.6:

1. In the review report, the panel suggested that the agency publishes the full panel reports along with the final reports produced by the Evaluation Committees, when they contain more valuable information.

To which extent and how often do the final reports differ from the full review reports? Could you please illustrate what type of information is excluded from the final reports?

In regards to ESG 3.3:

1. In the review report, the panel has described the organisational structure of the agency, including information about several bodies within the agency. Could you please explain the procedure

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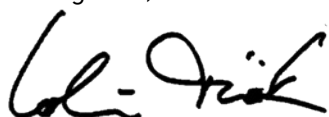
for appointing and dismissing of the members of the (1) Committee of Experts and (2) Commission of Evaluation, Certification and Accreditation?

We would be grateful if it was possible for you to respond by 05/10/2021, and we would appreciate if you get in contact with us should that not be feasible.

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

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

Kind regards,

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

Colin Tück
(Director)

Cc: Ewa Kolanowska (Secretary)
ENQA (coordinator)
ACPUA

Colin Tück

Director

European Quality Assurance Register for Higher Education (EQAR)

Aarlenstraat 22 rue d'Arlon

BE-1050 Brussels

BELGIUM

22/9/21

Re: Application by ACPUA for Renewal of Registration on EQAR

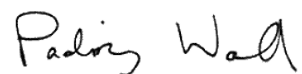
Dear Colin,

I refer to your letter of 21 September in relation to the above report.

Please find in Appendix the response of the members of the ENQA appointed review panel to EQAR's queries in relation to ESG 2.6 and ESG 3.3.

I trust that the response satisfies your questions.

Yours sincerely,

A handwritten signature in black ink that reads "Pádraig Walsh". The signature is written in a cursive, slightly slanted style.

Dr. Pádraig Walsh

Chair, ENQA Panel for ACPUA review

APPENDIX

Response from ENQA Review Panel to the queries from the EQAR Register Committee in relation to the ACPUA review report

EQAR: Could you please explain the procedure for appointing and dismissing of the members of the (1) Committee of Experts and (2) Commission of Evaluation, Certification and Accreditation?

Committee of Experts – Advisory Body

The Committee of experts is an advisory body of ACPUA and is composed of national and international experts. It is responsible for providing advice and recommendations and supervising the enhancement of ACPUA's methodologies and activities.

The appointment procedure for the Committee of Experts is laid down in the Aragon Higher Education Act 5/2005 of 14 June 2005. The provisions of the Law are incorporated into ACPUA's internal regulations.

Committee of Experts - Law, Article 91 states that:

1. There will be a Committee of Experts as advisory body of the Agency with the composition and functions regulated in this Law and in the Agency's Bylaws.
2. The number of experts will be adapted to the needs and functions progressively required by the Agency. In any case the following will initially form part of it:
 - a) Two Spanish experts of recognised standing in issues related to university quality and accreditation. One of them, at least, must develop its regular professional activity outside the Autonomous Community of Aragon.
 - b) Two foreign experts of recognised standing in issues related to university quality and accreditation.
3. The people that are part of the Committee of Experts will be appointed by the President (the Chair of the Board of the Directors) of the Agency, on the proposal of the Director and heard by the Board of Directors. The appointment is published in the *Aragon Official Gazette*. The dismissal of the members of the Committee of Experts requires following the same procedure.

At the time of the evaluation the members of the Committee of Experts were:

- Laurant Mayali (Chair), Professor of Law, University of California, Berkeley
- Fiona Crozier, International expert (UK) – ex Head of International QAA
- Eva Ferreira Garcia, Professor of the University of Pais Vasco
- Carlos Martin Mortanes, Professor of the University of Zaragoza
- Maximo Valenciano Arranz, President of INYCOM

The Commission of Evaluation, Certification and Accreditation (CECA) – Technical Body

CECA is the technical body that in charge of evaluation, certification and accreditation.

The members of the Commission of Evaluation, Certification and Accreditation are proposed by the Committee of Experts and appointed/approved by the Director. The dismissal of the members CECA requires following the same procedure.

Articles 90 and 91 of the Law, *powers/responsibilities of the Committee of Experts* confer on this Committee the power to propose the composition of the evaluation, certification and accreditation commissions developed within the Agency to the Director and the Director to appoint the members of the Evaluation Committees proposed by the Committee of Experts.

The functions of CECA are to:

- Produce the evaluation, certification and accreditation procedure proposals and the required updates and modifications
- Issue the proposals for experts to be appointed as reviewers
- Provide advice about any related issue upon requests of ACPUA's Director or Board of Directors.

CECA prepares and approves the Agency's evaluation methodologies, protocols and procedures. It does not do evaluations or issue evaluation reports. It is made up of academic experts, students professional, international experts and external stakeholders. The Commission is Chaired by the Director of ACPUA.

CECA is composed of at least, five renowned experts in the field of evaluation and quality assurance.

The members of CECA, at the time of the evaluation were:

- Antonio Serrano Gonzalez, Director ACPUA (Chair)
- Patricia Espejo Megias, University of Castilla La Mancha
- Maria Leonor Gonzalez Menorca, University of La Rioja
- Francisco Gracia Navarro, University of Cordoba
- Ignacio Ladrero Panos, Student, University of Zaragoza
- Luis A. Polo Rubio, external stakeholder, Cruz Roja Espanola

EQAR: In the review report, the panel suggested that the agency publishes the full panel reports along with the final reports produced by the Evaluation Committees, when they contain more valuable information. To which extent and how often do the final reports differ from the full review reports? Could you please illustrate what type of information is excluded from the final reports?

Reporting

ACPUA publishes all its evaluation reports on its website, including the initial programme accreditation reports that are negative. The format of the reports follows the guidelines established by general regulations, as well as those of the agency itself, in terms of structure and content. Prior to the preparation of these documents, the experts receive detailed information from the ACPUA technical team to ensure that the reports are systematised and standardised.

The agency maintains in most processes a two-stage model in which the evaluation panel makes an initial assessment and issues a report in a consensual manner. The presence of an ACPUA technician on all evaluation panels, with speaking rights but no vote, ensures the correct and uniform application of the evaluation protocols by the different panels.

Two kinds of reports are prepared in evaluation processes: initial reports drafted by expert review panels and final reports produced by the Programmes and Institutions Evaluation Committees. All

members of the expert Review panels and the Evaluation Committees contribute to reports, and students appreciate that their voice is heard and their inputs reflected in reports.

The Committees redraft the 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 Committees do not change the substance of the report or the meaning of the comments in the panels' reports but do sometimes change the wording as the same terminology based on the same approach to the use of the criteria should be used in all reports to avoid discrepancies. When the Committee intends to change the wording, it gets back to the panel and asks if the new wording conveys the meaning that the panel wished to convey.

The review committee issues its report in constructive terms (including not only formal outcomes and recommendation but also best practices, strengths and weaknesses) and indicating the area for improvement and ensuring consistency between reports thanks to the cross-cutting vision it has of all of them.

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. This information was gleaned by the ENQA panel from the ACPUA SAR; Evaluation protocols and guides and from Meetings with the Evaluation Committees, staff and reviewers. 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.)

In relation to the extent and how the final report differs from the expert panel's initial report, the ENQA panel, in our report, 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 to complement the final Evaluation Committee report.

There is no sense that the final published reports are deficient. This was clear from the panel's meetings with the evaluated institutions. The final reports are concise to make them more readable and so that the reader can find the judgment easily and clearly. The panel's suggestion in relation to the publication of the expert panel report as a complement in that they may be richer in information, for the interested technical reader.