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Bern, 28 February 2020

Subject: Membership of NEAQA in ENQA

Dear Jelena Kočović,

I am writing to inform you of the decision taken by the ENQA Board on 20 February 2020 regarding the membership of NEAQA in ENQA. After a thorough consideration and discussion on the review report, the ENQA Board concluded that, although progress has been made, the overall level of compliance with the ESG is not sufficient to renew the NEAQA membership at this stage. The Board was especially concerned about the cases where only partial compliance with the ESG is reached:

ESG 3.4 Thematic analysis

The Board shares the panel's view that a more reflective and analytical attitude toward the external quality assurance activities of the agency should be put in place through thematic analyses, which would unveil the potential and complexities of those activities. As the panel writes, the thematic analyses "have the potential to fight the [...] complacency in the HE system by encouraging self-reflection and promoting innovations". Therefore, the Board urges the agency to start producing thematic analyses regularly and use them as a tool for self-reflection and further development.

ESG 3.6 Internal quality assurance and professional conduct

The review report reads: "there is a lack of systematic collection and analysis of feedback provided from [...] various participants in the [external quality assurance] process, and the majority of feedback is collected informally". The panel further notes that the agency "should triangulate [the collected feedback] by e.g. creating opportunities for ex-post evaluation discussions about its processes and how to improve them". The Board supports the panel's analysis and asks the agency to follow the requirement of the standard more closely. As the standard reads, agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their processes.

ESG 2.1 Consideration of internal quality assurance

The Board agrees with the panel's call to the agency to start a broad discussion with all stakeholders on how to reorient the whole external quality assurance system towards the development of the quality culture that will presuppose institutional responsibility for implementing Part 1 of the ESG. As the report

writes, “NEAQA needs to define in which areas quality control is needed and integrate these aspects into an approach that targets quality enhancement”.

ESG 2.2 Designing methodologies fit for purpose

The Board shares the panel’s critical view on the need to adapt the agency’s procedures in external quality assurance to fit the variety of types of institutions, and their contexts, in Serbian higher education sector.

ESG 2.3 Implementing processes

In regard to the standard 2.3 Implementing processes, the Board considers it urgent for the agency to deepen the level of its assessments and consider prolonging the site visits, as recommended by the review panel. Furthermore, the Board supports the panel’s proposal to rationalise processes of external quality assurance for similar programmes at the same higher education institution, as feasible.

ESG 2.7 Complaints and appeals

The Board is concerned of the possibility of the National Council to overrule the decision of the agency’s Commission for Accreditation and Quality Assurance, which is a major threat to the independence of formal outcomes of the agency’s procedures. As the report reads, “a fair, independent, and effective mechanism of [complaints and appeals] is a crucial piece of the [higher education] system and needs to be in place to nurture the trust of [higher education] institutions”. Therefore, the Board calls upon the action to redefine the agency’s appeals procedure and establish a separate complaints procedure that will be in line with the requirements of the ESG.

Despite the concerns stated above, the Board commends the efforts NEAQA is making to improve its processes of external quality assurance and invites the agency to continue with its efforts. Much work remains to be done on improving the effectiveness of higher education institutions’ internal quality assurance and encouraging these institutions to take primary responsibility for their quality.


Should NEAQA wish to re-apply for ENQA membership in the future, you can do that in two years’ time from this decision. The ENQA Board advises the agency to carefully follow up and implement the panel’s recommendations before re-applying.

In addition, NEAQA can still avail of the voluntary progress visit – a new enhancement-led feature in the review process. The visit will not have the objective of checking the agency’s ESG compliance but might be helpful to determine if the agency has addressed the areas of concern, in light of preparation for a possible new review. The visit would take place in about two years’ time from this decision. The ENQA Secretariat will be in touch with you in about a year’s time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the Guidelines for ENQA Agency Reviews.

Should NEAQA object to the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 24 of ENQA's Rules of Procedure.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,



Christoph Grolimund
President

Annex: Areas for development

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As outlined by the review panel, NEAQA is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

ESG 3.1 Activities, policy and processes for quality assurance

Even within the present legal constraints, NEAQA is recommended to strive towards involving all stakeholders, and particularly students, as full members in all of its bodies. The agency should use its international connections to also more actively encourage the participation of international experts in its bodies.

The governance of the agency should reflect the diversity of stakeholders and of the HE system and avoid being dominated by a small number of institutions, regardless of their prestige and importance.

NEAQA is recommended to, in cooperation with the stakeholders, develop a new strategy which would enable the implementation of its mission of enhancing quality of Serbian HE in line with the international standards while keeping a level of control that they find is needed in their system.

ESG 3.3 Independence

In addition to involving more experts from outside the system (see ESG 3.1), the agency is recommended to strengthen its independence from HEIs as well as the government by following the steps, which need to be taken in cooperation with all stakeholders in the system:

- (1) To uphold the operational independence of the agency, define the criteria for membership in the bodies of the system which would focus on a balance of their personal experiences and motivation, in addition to the proportional representation of the system and formal criteria defined by LoHE.
- (2) To uphold the organisational independence of the agency as well as the independence of formal outcomes, ensure that the Director is a full-time position with no contractual obligations towards HEIs within the system.
- (3) To uphold the organisational independence of the agency as well as the independence of formal outcomes, work with the National Council to define a clearer appeals procedure (see ESG 2.7).

ESG 3.4 Thematic analysis

NEAQA is recommended to not only start regularly producing thematic analyses, but to use them as a tool for self-reflection (see ESG 3.6) and as a tool to promote good and innovative practices that can be spread throughout system.

ESG 3.5 Resources

NEAQA is recommended to establish full costs of the procedures, in order to streamline them if possible and thus reduce the overall costs to HEIs, but also to establish long-term financial plans which would enable it to acquire timely additional support from the state budget if necessary.

NEAQA is recommended to establish a human resources development plan which would provide not only the criteria and plans for employing new staff, but also training and development activities for both existing and new staff.

ESG 3.6 Internal quality assurance and professional conduct

NEAQA is recommended to introduce formal mechanisms for collecting feedback from experts and institutions after each procedure, collect more qualitative additional feedback, e.g. through focus groups, interviews etc. to reflect on the procedures, especially the pilot procedures and establish similar mechanisms to regularly collect feedback from internal stakeholders – staff and CAQA members. The feedback should be collected and analysed in a manner that enables the stakeholders to comment on what they find relevant, and that can be used by NEAQA to continuously improve its work and the framework in which it operates, and report this to the public.

ESG 2.1 Consideration of internal quality assurance

NEAQA internal stakeholders need to reflect on the 2017 recommendations and start a broad discussion with all stakeholders on how to implement them and start the reorientation of the whole system towards the development of the quality culture which presupposes institutional responsibility for implementing the first part of the ESG in its entirety, rather than a more lenient system of external control.

ESG 2.2 Designing methodologies fit for purpose

The agency is recommended to consider the ways in which it could adapt its procedures to different types of institutions it evaluates and their varying contexts.

In addition to and while implementing the recommendations under ESG 2.1, 3.4 and 3.6 which are all also relevant for this standard, NEAQA should establish, in collecting feedback from the HEIs, which issues are strategic and require long-term institutional action, as opposed to details which can be corrected quickly. This should be emphasised in guidelines to panels and taken into account by CAQA when giving recommendations, to avoid an overtly prescriptive approach and enable change and development.

ESG 2.3 Implementing processes

NEAQA is recommended to deepen the level of assessment, in which longer site visits would be of help. This would enable longer meetings which could thus serve as a forum for enhancement-oriented discussions in addition to being a source for evidence checking.

The agency is recommended to develop mechanisms of clustering similar programmes in the same institution to assure greater congruence and efficiency of evaluations, rather than organising this ad-hoc and without an impact on the costs of the evaluation.

The agency is recommended to decide in a broad discussion with stakeholders if audit is meant to serve as a follow-up to accreditation or a separate follow-up procedure is necessary, and if audit itself should have a clear follow-up also in cases when the opinion is not issued.

ESG 2.4 Peer-review experts

The training of reviewers should be more regular and focus on gaining actual competences, preferably through working in much smaller groups. These competences include the skills necessary to successfully lead interviews and organise group work, as well as understanding of key EHEA concepts such as student-centred learning, ECTS and learning outcomes, etc.

NEAQA is recommended to develop a process which secures that an expert is not asked to assess their previous employers, e.g. by checking short CVs of the experts before inviting them.

ESG 2.5 Criteria for outcomes

NEAQA is recommended to implement the 2017 recommendation to provide benchmarks for its decisions and not base them solely on numerical grades.

In addition to improved trainings (see ESG 2.4) NEAQA should also implement one or more of the numerous practices existing to improve consistency in its decision-making – such as critical readers of preliminary reports, committee of experienced reviewers, a scrutiny group of experts who check the reports, systematic comparison of different standards in the same field, a database of decisions and precedents, etc.).

ESG 2.6 Reporting

The agency is recommended to uphold the practice of publishing all full reports, and include this in the regulations, at least the NEAQA statute as other regulations can only be changed by other bodies.

The responsibility for the dissemination of results should be awarded to both the agency and to the institutions, which should ensure that prospective and current students, employers, and other stakeholders have easy access to the results of accreditation processes. Furthermore, the agency should find creative ways to make those stakeholders aware of its work and its impact, as this is critical to build trust upon the HE system and to show the relevance of its work in that respect.

ESG 2.7 Complaints and appeals

The agency is recommended to ensure that an independent body decides on appeals in line with an established procedure of decision-making. Such a procedure should not have changing the decision as an outcome, and the agency and its stakeholders should try to ensure this to the degree in which this is possible without changing the law. Such an independent body should always include not only different stakeholder perspectives but also legal and QA expertise and experience.

The panel recommends NEAQA to develop a complaints procedure adapting the Administrative Law.