

ENQA TARGETED REVIEW

# AGENCY FOR THE QUALITY OF THE BASQUE UNIVERSITY SYSTEM (Unibasq)

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European Association for  
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## EXECUTIVE SUMMARY

This report summarises the analysis and conclusions of the European Association for Quality Assurance in Higher Education (ENQA) review of the Agency for Quality of the Basque University System (Euskal Unibertsitate Sistemaren Kalitate Agentzia, Unibasq / Agencia de Calidad del Sistema Universitario Vasco) Spain (Unibasq/the agency). The review was performed against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) following the methodology described in the Guidelines for ENQA Targeted Reviews.

The purpose of the review was the renewal of Unibasq's membership in ENQA and the European Quality Assurance Register for Higher Education (EQAR) registration for a period of 2024-2029.

The review took place from May 2023 to February 2024 with the site visit on 3<sup>rd</sup>-5<sup>th</sup> October 2023.

The Agency for Quality of the Basque University System (Unibasq) is a state-owned body governed by private law attached to the Basque Government's department responsible for universities. Its objective is the evaluation, accreditation and certification of quality in the area of the Basque University System, taking the Spanish and international frameworks into account. Unibasq was created under Article 79 of Act 3/2004 on the Basque University System and began its activities in 2006. Unibasq has been registered on EQAR since April 2014.

Unibasq's vision is to carry out its activities independently, transparently, objectively, effectively and competently, basing itself on international standards that guarantee quality in higher education. The mission of the agency is to help improve the Basque University System by promoting its quality and taking into account the interest groups involved in higher education.

This report addresses the ESG standards where Unibasq was evaluated as partially compliant by the EQAR Register Committee during the previous full external review of the agency in 2018, namely ESG 3.1 Activities, policy and processes for quality assurance, ESG 2.6 Reporting and ESG 2.7 Complaints and Appeals.

Since the last full external review against ESG in 2018, Unibasq has also reported to EQAR substantial changes related to revision of the current procedures and implementation of new ones (2022).

Therefore, this review also addresses the standards of the ESG Part 2 for the following activities:

- Accreditation renewal of study programmes outside the Basque University System (new);
- Labels (new): Dual and International;
- CeQuint Certification (new);
- Ex-post evaluation of artistic study programmes (new);
- Institutional Accreditation, covering those areas where changes were made and at least the following in detail:
  - ESG 2.2: how the agency ensures that the revised methodology is fit for purpose and how were stakeholders involved in the development of the processes and criteria;
  - ESG 2.4 training of the review panels for this activity;
  - ESG 2.6: details about the stage when reports are published.

Also, the review panel was asked to evaluate ESG 2.1 Consideration of internal quality assurance across all of Unibasq's activities.

Finally, this report also addresses Unibasq's selected enhancement area ESG 3.4 Thematic analysis.

The summary of UNIBASQ's compliance with the ESG Part 2 and Part 3, based on this review, is demonstrated in the table below:

## Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review <sup>1</sup>	Compliance transferred from the last full review <sup>2</sup> (Judgement of the 2018 review panel → Judgement of the EQAR Register Committee)
2.1	Compliant	
2.2	Compliant (for new or changed QA activities only)	
2.3	Compliant (for new or changed QA activities only)	
2.4	Compliant (for new or changed QA activities only)	
2.5	Compliant (for new or changed QA activities only)	
2.6	Partially compliant	
2.7	Compliant	
3.1	Compliant	
3.2		Fully compliant → Compliant
3.3		Fully compliant → Compliant
3.4		Substantially compliant → Compliant
3.5		Substantially compliant → Compliant
3.6		Fully compliant → Compliant
3.7		Fully compliant → Compliant

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<sup>1</sup> Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

<sup>2</sup> Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

# INTRODUCTION

This report analyses the compliance of the Agency for Quality of the Basque University System (Euskal Unibertsitate Sistemaren Kalitate Agentzia, Unibasq / Agencia de Calidad del Sistema Universitario Vasco) Spain (Unibasq/the agency) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted in May 2023 – February 2024 and should be read together with the external review report of the agency's last full review against the ESG.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

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

Registration on the European Quality Assurance Register for Higher Education (EQAR) is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's compliance with the ESG. An external review is a prerequisite for registration.

As Unibasq has undergone two successful reviews against the ESG Parts 2 and 3 (in 2014 and 2018), it was eligible and opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes<sup>3</sup> during the past five years while at the same time further strengthening the enhancement part of the review.

In the period between 2018 and 2023 Unibasq submitted a substantive change report to EQAR (in 2022).

The review addresses the standards where Unibasq was found to be partially compliant with the ESG during the last review in 2018 by EQAR's Register Committee (in 2019), also the substantive changes made between 2018 and 2023 and the enhancement area selected by Unibasq.

### SCOPE OF THE REVIEW

This review focuses on three ESG standards where Unibasq was found to be partially compliant during the last review against the ESG: 3.1 Standards and guidelines for quality assurance agencies, ESG 2.6 Reporting and ESG 2.7 Complaints and appeals.

Since the last review in 2018, Unibasq reported to EQAR substantial changes to its operations (in 2022), namely related to the modification of its current external quality assurance procedures (Institutional Accreditation) and introduction of new activities.

Such modifications as well as new activities that were included in the scope of this review are the following:

- Accreditation renewal of study programmes outside the Basque University System (new);
- Labels: Dual and International (new);

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<sup>3</sup> e.g. organisational changes, the launch of new external QA activities.

- CeQuint Certification (new);
- Ex-post evaluation of artistic study programmes (new);
- Institutional Accreditation, covering those areas where changes were made and at least the following in detail:
- ESG 2.2: how the agency ensures that the revised methodology is fit for purpose and how were stakeholders involved in the development of the processes and criteria;
- ESG 2.4 training of the review panels for this activity;
- ESG 2.6: details about the stage when reports are published.

Also, the review panel was asked to evaluate ESG 2.1 “Consideration of internal quality assurance” in all activities.

Finally, this report also addresses Unibasq’s selected enhancement area ESG 3.4 Thematic analysis.

During the review process the review panel did not find any evidence of activities that were not assessed during last full review against the ESG and that were not included in the Terms of Reference of this review. The review panel also did not discover any other substantial changes to the quality assurance activities carried out by Unibasq that were not already reported to EQAR and included in the Terms of Reference.

## MAIN FINDINGS OF THE 2018 REVIEW

Unibasq went through the full agency review in 2018. According to the EQAR Register Committee’s decision (2019), Unibasq was found to be in the following state of compliance with ESG Part 2 and 3:

ESG 2.1 Consideration of internal quality assurance – Compliance;

ESG 2.2 Designing methodologies fit for purpose – Compliance;

ESG 2.3 Implementing process – Compliance;

ESG 2.4 Peer-review experts – Compliance;

ESG 2.5 Criteria for outcomes – Compliance;

ESG 2.6 Reporting – Partial compliance;

ESG 2.7 Complaints and appeals – Partial compliance;

ESG 3.1 Activities, policy and processes for quality assurance – Partial compliance;

ESG 3.2 Official status – Compliance;

ESG 3.3 Independence – Compliance;

ESG 3.4 Thematic analysis – Compliance;

ESG 3.5 Resources – Compliance;

ESG 3.6 Internal quality assurance and professional conduct – Compliance;

ESG 3.7 Cyclical external review of the agencies – Compliance (by virtue of applying).

In 2018 the review panel concluded that Unibasq is in compliance with the ESG.

Regarding ESG 2.6, EQAR Register Committee in the Approval of the Application (2019) stated: “In the last review of the agency the Register Committee flagged for attention the publication of reports for evaluation of study programmes and monitoring reports of study programmes, which then were only

communicated to the interested party. The review panel found that Unibasq published all reports, except for the ex ante accreditation reports on programmes that have not been successful. In its additional representation Unibasq confirmed that it does not publish reports for the from ex-ante accreditation, arguing that it would be confusing for readers to find information on a study programme that will never exist. Unibasq did not express any intention to change this practice in future. The Register Committee underlined that all reports should be published as required by the standard. The Committee underlined that even if a study programme will not be offered it can be of interest for the public to know which concepts were denied accreditation and why. In particular, such information is important if the same programme applies for accreditation by another agency, which needs to be able to find out that it was earlier denied accreditation by another agency. **As the flag was largely, but not fully, addressed the Register Committee did not concur with the review panel's conclusion of compliance, but concluded that Unibasq still complies only partially with ESG 2.6."**

Regarding ESG 2.7 the EQAR Register Committee concluded that "In order to improve the appeals procedure, the former Ethics Committee became the Ethics and Guarantees Committee, which was composed of members who play an active role within the agency. The review panel noted that the composition of the Committee was limiting its independence. The Register Committee underlined the recommendation of the panel that the Ethics and Guarantees Committee be composed of members who are independent from the agency and the Basque higher education system. In its additional representation, Unibasq stated that the composition of the Committee had been changed. The new Ethics and Guarantees Code, which was approved by Unibasq's Governing Council, established that the Committee is now composed of experts from outside the Basque University System, who moreover cannot be part of any other Unibasq body or committee. The Register Committee was able to see the new composition on Unibasq's website. Furthermore, while the panel confirmed that Unibasq has developed clear appeals processes, it referred to "a more general procedure for the reception and handling of complaints and suggestion" but did not analyse that in detail. In its additional representation, Unibasq did not comment further on the complaints procedure. **Given the unclear process for handling complaints, the Register Committee remained unable to concur with the review panel's conclusion of compliance but concluded that Unibasq complies only partially with ESG 2.7."**

In regard to ESG 3.1 "The Register Committee sought and received clarification regarding the evaluation of "títulos propios". Unibasq clarified that these activities were not listed in its application for renewal of registration because Unibasq "realized that it was more a consultancy activity as Unibasq just provides an external expert report" and thus did not consider them as activities within the scope of ESG. In support of its classification, Unibasq stated that it acted only as a subcontractor to the UPV/EHU and had no responsibility for the review process or the outcomes. The Register Committee also noted that Unibasq does not provide "accreditation" of "títulos propios", contrary to what was published by UPV/EHU. Unibasq, however, stated on its website that it "will evaluate and certificate" those degrees. Unibasq further noted that the misunderstandings were caused by a discrepancy between the internal regulations of the UPV/EHU and the public information on their website, stating that some programmes are accredited by Unibasq. Having considered Unibasq's response, the Register Committee accepted that the evaluation of "títulos propios" may be classified as consultancy service performed by Unibasq to UPV/EHU. The Register Committee further considered how Unibasq ensured a clear distinction from its external quality assurance activities within the scope of the ESG (see EQAR Policy on the Use and Interpretation of the ESG, standard 3.1 and Annex 5). The Committee noted that such a clear distinction was particularly crucial in this case, given that the terminology and the characteristic of the activity caused an actual risk of confusion with ESG activities. The Register Committee concluded that the presentation on Unibasq's website was misleading and did not ensure clarity as to the different nature of these evaluations; it thus considered that Unibasq did not comply with the standard. In its additional representation, Unibasq stated that it held specific meetings with the UPV/EHU, sent a formal letter regarding this issue and elaborated a new agreement with the UPV/EHU, which was approved by Unibasq's Governing Council. As stated in the agreement, the evaluations of "Títulos propios" are consultancy activities which cannot be represented as "Accredited, validated or reviewed by Unibasq". In addition, Unibasq



removed from its website the information that could have been misleading about “títulos propios” previously. The Committee, however, noted that UPV/EHU continues to refer to an “external report” by Unibasq in its advertisement of “títulos propios”. The Register Committee welcomed Unibasq’s steps that were taken to clarify the status of this activity and to avoid further misinterpretations. At the same time, the Register Committee considered that it cannot be fully determined at this stage whether the new communication is fully clear to all stakeholders and avoids any misrepresentation; this should thus be analysed in the next external review of Unibasq. **The Register Committee remained unable to concur with the panel’s conclusion of compliance but concluded that Unibasq now complies partially with standard 3.1.”**

The review panel would like to note that the transfer of compliance with the ESG standards from the 2018 review applies to all activities that have been covered in the earlier review. However, the judgement on compliance for the new and revised activities has been made based on the evidence presented in 2023 and therefore can differ.

## REVIEW PROCESS

The 2023 external targeted review of Unibasq was conducted in line with the process described in the Guidelines for ENQA Targeted Reviews, the EQAR Procedures for Applications, and in accordance with the Terms of Reference. The panel for the targeted review of Unibasq was appointed by ENQA and composed of the following members:

Achim Hopbach, Higher Education Consultant, Independent, Austria, Chair, QA professional (ENQA nominee);

Ieva Vaiciukevičienė, Head of Legal and General Affairs Division, Centre for Quality Assessment in Higher Education (SKVC), Lithuania, Secretary, QA professional (ENQA nominee);

Mar Campins Eritja, Catedrática de Universidad (Professor) in Public International Law, Department of Criminal Law and Criminology and Public International Law and International Relations, Universitat de Barcelona, Spain, panel member, academic (EUA nominee);

Adrian Korzeniowski, Bachelor studies in Electronics and Telecommunication, Lodz University of Technology, Poland, panel member, student (ESU nominee, member of the European Students’ Union Quality Assurance Student Experts Pool).

Fiona Crozier, ENQA’s representative, acted as the review coordinator.

The review took place from May 2023 to February 2024. The review panel received the SAR in June 2023 and on 14<sup>th</sup> July 2023 the first briefing meeting was held. During this meeting the review panel was provided with the input from review coordinator and the representatives from EQAR – Blazhe Todorovski and Melinda Szabo. Other meetings of the review panel took place on 8<sup>th</sup> August, 14<sup>th</sup> and 28<sup>th</sup> of September 2023.

The site visit was organized from 3<sup>rd</sup> to 5<sup>th</sup> October 2023 in Unibasq’s premises. Most of the participants attended the meetings face-to-face, however in some meetings online technologies were used. Thanks to the excellent technical arrangements, the online meeting did not have any negative impact on its efficiency.

The draft report was completed on 25<sup>th</sup> November 2023 and sent to Unibasq for the factual error check on 27<sup>th</sup> November 2023. Unibasq’s feedback on factual errors was received on 11<sup>th</sup> December 2023. The final review report was submitted to the ENQA’s Agency Review’s Committee on 13<sup>th</sup> December 2023.

The review panel would like to confirm that the arrangements by ENQA ensured a smooth and well-coordinated review process.

All the findings and conclusions of this review report are the joint opinion of the review panel and have been agreed on during the report drafting process.

### **Self-assessment report**

Unibasq started the self-assessment process with a review of the previous evaluation report and the follow-up report regarding actions taken in the areas for development suggested by the ENQA Board and sent to ENQA in February 2021, in parallel with a compilation of information about Unibasq's activities since 2018 and a careful reading of the ENQA and EQAR guides. In order to have a clearer idea of what a targeted review meant Unibasq attended the ENQA Agency Reviews' seminar for agencies planning to undergo a review in 2022-2023 (31 May – 1 June 2022, Cologne, Germany). After that there was an initial reflection in the Unibasq Directorate to decide whether to undergo a targeted review and to decide on the standard or standards for enhancement followed by a communication of the decision to Unibasq Governing Board and Advisory Board.

In order to consider all different views expressed during the development of the SAR, Unibasq involved its entire operational staff and set up a specific working group with the following composition: Unibasq's Internationalisation and projects manager and representatives from the agency's Advisory Board, Institutional Accreditation Committee and Students' Consultative Committee.

The draft document was discussed in the working group during May and June 2023. It was presented afterwards to the Advisory and Governing Boards.

The review panel would like to indicate that the quality of the SAR was good: it was informative and clear, however the agency was asked to provide additional documents and clarifications (additional information regarding "títulos propios", reporting issues incl. examples of negative reports, expert training materials as well as translations of a couple of documents.).

### **Site visit**

The site visit was held on 3<sup>rd</sup>-5<sup>th</sup> October 2023 in the Unibasq premises. Most of the meetings were organized face-to-face, however some meetings (e.g. with Student Consultative Committee, members of Evaluation Committees, members of the Expert pool, members of Ethics and Guarantees Committee and representatives of higher education institutions from outside the Basque system and stakeholders) were organized using online technologies. The organization of the site visit was agreed in advance with the review panel, the agency and ENQA. The proposed technical arrangements (visual and sound equipment, internet connection) enabled the review panel to conduct the interviews in a proper manner.

Taking into consideration the scope of the review, specified in the Terms of Reference, the panel decided to address all focus areas in every interview with different group, including the selected enhancement area. There was a specific meeting with the staff of the agency to deepen the exploration of issues concerning the selected enhancement area.

The full list of meetings that the review panel conducted is provided below:

- Meeting with the CEO and the representatives of the Governing Board;
- Meeting with the Agency's representatives involved in study programmes and institutional reviews;
- Meeting with the representatives of Advisory Board;

- Meeting with the representatives of different Evaluation Committees (hybrid meeting with one participant online);
- Meeting with the representatives of Ethics and Guarantees Committee;
- Meeting with the Agency's staff on the agency's self-selected enhancement area (ESG 3.4)
- Meeting with representatives of the Basque Government's Education Department;
- Meeting with the representatives of the Student Consultative Committee (online)
- Meeting with representatives from the reviewers' pool (online)
- Meeting with stakeholders (employers, students, local community) (hybrid meeting with one participant online);
- Meeting with the representatives of local HEIs (including quality assurance officers of HEIs);
- Short meeting with the representatives of foreign HEIs (online);
- A session to further investigate additional topics that may arise during the site visit regarding agency's compliance with the ESG;
- Meeting with CEO/resource person to clarify any pending issues.

During the site visit there was no necessity for translation.

It was decided not to conduct the separate interviews with the SAR working group considering the size of Unibasq and enabling all staff members' participation in the meeting with agency's staff.

The review panel was able to clarify pending issues with the staff twice: once with the agency's resource person and once with the Director and the resource person.

The Unibasq premises were appropriate for the site visit and were well-equipped for the interviews. The staff of Unibasq was very helpful.

The review panel appreciates the quality and the atmosphere of the interviews: all the participants were very open and engaged in the discussions.

## CHANGES WITHIN THE AGENCY

### HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

The last full review was done based on the information gathered in the SAR (June 2018) and the site visit to Unibasq (October 2018). Since then, several changes have happened in the Basque Higher Education System:

- a new university has been created;
- new regulations and adaptations occurred in the Spanish higher education and quality assurance system;
- new external quality assurance activities were introduced.

The following table gives an overview of the current state of the Basque University System. If compared with the data from 2018, the main changes are the creation of the new university EUNEIZ, a private university integrated into the Basque University System which, from the academic year 2022/2023, will gradually begin to offer study programmes specialising in new technologies, sport, and health.

According to the SAR, the current Basque University System consists of 4 universities (one public and three private). A total of 120 bachelor’s programmes, 168 master’s programmes and 78 doctoral programmes are offered to around 61000 students. The system has almost 6000 academic staff and 2500 administration and services staff.

Basque University System overview is presented in this table (from Unibasq SAR):

Table 1. Basque University System overview.

University (Year creation)	Type of institution	of Faculties or Schools	Bachelor programmes	Master programmes	Doctorate programmes	Academic staff	Administration and Services staff
UPV/EHU (1980)	Public	20 (4)	69	107	66	4505	1883
Deusto University (1886)	Private, not-for profit Church	6 (2)	29	42	8	735	555
Mondragon Unibertsitatea (1997)	Private, not-for profit cooperative	4	18	19	4	615	164
Euneiz (2022)	Private, for profit	2	4	--	--	--	--

Data source: University Information Integrated System (SIU) 2022-2023 data regarding institutions and study programmes – SIU 2021-2022 data regarding staff. The numbers between brackets stand for affiliated university centres.

Also, in the period 2018-2023 there were changes in the legal environment, including at the national level. Unibasq has been working together with the agencies in the Spanish Network of Quality Assurance Agencies (REACU) to analyse the impact of these changes in the regulatory framework on the agency’s procedures. The changes will mainly affect the specific evaluation guides of each of the agencies (which are still under development), and the online platforms used.

## UNIBASQ’S ORGANISATION/STRUCTURE

In the last five years, there have been no changes in the structure of the governing or technical bodies nor in the operational structure of Unibasq.

Unibasq is a public entity governed by private law (which gives it more administrative and financial autonomy) and accountable to the Basque Government department in charge of universities. The Governing Board is responsible for the governance of the agency in strategic and structural terms. The approval of its strategic and annual management plans, the agency’s preliminary budget plan and the programme-contract are its main functions. It includes representatives from the Basque Government, the director of the agency, the rectors of the four Basque universities, one student, another person with recognized academic prestige, and six persons appointed by the Basque University Council (three of them working outside the Basque Autonomous Region, one of whom at least must work outside Spain and two must work outside the university community).

The Advisory Board is responsible for the development and approval of all evaluation procedures and criteria to be used by the agency. It is also responsible for the submission of proposals to the Director of the agency for the appointment and, where appropriate, the dismissal of members of the Evaluation Committees. Finally, it acts to safeguard the impartiality of the work of Unibasq.

The Evaluation Committees are the scientific/technical bodies through which the Agency performs its evaluation, accreditation and certification functions; they are responsible for decision-making. In each Evaluation Committee academics, students and professionals are represented. The Ethics and Guarantees Committee evolved from just being the Ethics Committee to supervising the correct

implementation of Unibasq's evaluation, certification and accreditation procedures and the correct application of its Ethics and Guarantees code. In addition, this body has been charged of handling the appeals against the agency's assessment procedures. The Consultative Students Committee for student involvement is established in order to enhance student participation. It is composed of the students who are part of the Governing Board, Advisory Board and of some of the Evaluation Committees.

The most significant organisational changes at the agency since the last review are:

- The appointment of a new director on 1 November 2019, due to the end of term of the previous director;
- The adoption of the Strategic Plan 2020-2023;
- Adaptation of activities to the effects of the Covid-19 pandemic. Before the lockdown in March 2020, Unibasq had just finished uploading all its documents from physical servers to a SharePoint as part of the change to Microsoft Office 365. This facilitated working from home and the use of the available online communication platforms made possible to continue with the external reviews. In addition, communication with universities and REACU became more active.
- Consolidation of staff. In 2023 two temporary technical positions became permanent.
- Redesign and update of the Observatory of the Basque University System – Unibasq-Behatokia. The aim of the Observatory of the Basque University System – Unibasq-Behatokia is to offer a global and detailed vision of the activity of the Basque University System. This online tool enables collection of different data and documents from Basque university system and makes the quantitative indicators about student access and enrolment, performance, and employment rates available to the public.

## UNIBASQ'S FUNDING

There were no changes in Unibasq's funding.

Unibasq's budget is included in the budget of the Basque Autonomous Region, annually approved by the Basque Parliament. Basic funding includes the Agency's staff structure and the overhead costs, i.e. the Agency's current basis expenses. This funding covers the expenses of the fulfilment of the functions and activities that are entrusted to Unibasq by the law. Performance-based funding corresponds to the activity plan in order to improve and increase its consultancy and evaluation activities, as well as to enhance the quality and the international perspective of the Basque University System.

## UNIBASQ'S FUNCTIONS, ACTIVITIES, PROCEDURES

Some of the new external quality assurance activities that became operational since the last review were already introduced in the SAR 2018, although there were no completed procedures at that stage. For instance, the procedure for the accreditation renewal of study programmes outside the Basque University System and Dual Label procedures that were launched after the 2018 review. Also, in 2018 the first stage of Institutional Accreditation of university centres (schools and faculties) began as the Royal Decree 420/2015 of May 29th, about establishment, recognition, authorisation and verification of universities and university centres came into the power.

All the new or modified activities under the scope of the ESG will be further described below:

### **External Quality Assurance (EQA) activities for higher education institutions (HEI, HEIs)**

**Institutional Accreditation:** In order to obtain the initial Institutional Accreditation and in line with the procedure established in the Resolutions of 7 March 2018 and 3 March 2022, of the Spanish General Secretariat for Universities, HEI centers are required, to have renewed the accreditation of at least half of their study programmes as well as to obtain certification of their internal quality

assurance activities (IQAS) in accordance with the ESG and the procedures and guidelines developed by ANECA or the corresponding regional agency. On the grounds of the assessment report prepared by the Unibasq Institutional Accreditation Committee the Spanish Council of Universities makes the decision to accredit HEI centers. Thus, the study programmes offered by an accredited center no longer need to be individually submitted for accreditation renewal. The second phase of the Institutional Accreditation procedure has just started in 2023 as a pilot procedure. The essence of this modification is that the university centres can grant the renewal of accreditation of the study programmes they deliver without the obligation to undergo an external review of each of the study programmes as they have already proved the effectiveness of their own internal quality assurance systems. The pilot procedure was underway at Unibasq at the time of the targeted review.

**Ex-post evaluation of artistic study programmes:** The aim of this evaluation procedure is the evaluation of higher education artistic study programmes in the Basque Country. In 2021, Unibasq carried out the first review to renew the accreditation of one of these programmes. After 6 years the programmes need to renew their accreditation following the criteria and procedure for the renewal of accreditation of study programmes, which includes a site visit. One master programme has already renewed its accreditation following this procedure.

### **Voluntary EQA activities for HEIs**

**Labels:** The Unibasq Quality Labels are voluntary acknowledgements granted by the agency at the request of the universities in the Basque University System (SUV). The main objective of these awards is to promote and stimulate the efforts of the universities to improve their study programmes, with the secondary objective of improving the visibility of these efforts in society. The Unibasq Quality Labels focus, in particular, on those aspects of the universities' study programmes on which the university policy of the Autonomous Region of the Basque Country establishes its focus of attention and improvement. The quality labels deal with learning acquired in a work environment (Dual Label) and with the internationalisation. These reviews are additional to the regular ex-ante accreditation procedure. The aim of the Dual Label is to evaluate and recognize a learning methodology that combines learning at university and in a working environment; the aim of the internationalisation label is to evaluate and recognize the level of internationalisation of study programmes based on several aspects such as: internationalisation strategy, international mobility, satisfaction with these mobility activities, education offered in different languages and capability of the academic staff to offer the programme in different languages.

**Accreditation renewal of study programmes outside the Basque University System:** As Unibasq may also carry out evaluation, accreditation and certification activities at HEIs outside the Basque Autonomous Region, the agency has introduced a separate procedure as a quality assurance (QA) agency outside Basque University System. This led to the pilot external review of the Law programme of the University of Aconcagua (Chile) in 2018. The procedure is the same as that used in the accreditation renewal of Basque study programmes with some contextualization regarding higher education in Chile. The second initiative was done in the framework of an agreement signed between Unibasq and the Chilean accreditation agency AcreditAcción to provide a joint accreditation procedure. After an analysis of both frameworks, in 2022 a pilot joint accreditation procedure was carried out.

**CeQuint Certification:** As member of the European Consortium for Accreditation in Higher Education (ECA), Unibasq can coordinate reviews using the CeQuint methodology to assess the quality of internationalisation at programme or institutional level. A successful assessment leads to the award by ECA of the Certificate for Quality in Internationalisation.

The quantity of Unibasq's activities is demonstrated in the table below (from Unibasq SAR):

Table 2. Unibasq's procedures for each EQA activity (2018-2023).

	Activity	2018	2019	2020	2021	2022	2023 <sup>22</sup>
Activities under the scope of the ESG	Study programmes						
	Ex-ante accreditation	5	13	11	2	11	15
	Follow-up	66	93	271	86	--	2 <sup>23</sup>
	Modification	7	10	12	10	62	21
	Ex-post accreditation	15	57	20	46	65	1
	Ex-post accreditation abroad	--	1	--	--	1	--
	European Approach	--	1	--	--	--	2
	Label dual	26	13	8	6	--	--
	Label internationalisation	--	18	10	5	--	4
	Ex-ante Arts	4	--	--	--	--	--
	Ex-post Arts	--	--	--	1	--	--
	Institutions						
	CeQuint (Institutional)	--	--	--	1	--	1
	AUDIT	3	5	4	1	5	2
DOCENTIA	3	1	2	1	2	1	
Institutional accreditation	13	3	4	2	2	2	
Renewal of institutional accreditation	--	--	--	--	--	1-4 <sup>24</sup>	
Activities outside the scope of the ESG							
Academic staff evaluation	Titulos propios (life-long learning UPV/EHU)	23	21	12	12	12	4
	Academic staff accreditation	734	719	691	598	705	714
	Academic performance	--	287	420	410	968	876
	Research activity (sexenios)	156	143	189	170	169	228
	Research activity (Ikertramos)	84	115	46	53	43	33
	Research activity (Iker 22)	22	5	1	4	2	1
Research	Research institutes	--	1	--	--	--	--
	Research projects/teams	--	--	37	34	242	--

# FINDINGS: COMPLIANCE OF UNIBASQ WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

## 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.

#### 2018 review recommendation<sup>4</sup>:

*“Unibasq is recommended to clearly distinguish its ESG-based evaluation procedures and its consultancy activities.”*

#### 2019 EQAR conclusion<sup>5</sup>:

*“The Register Committee sought and received clarification regarding the evaluation of “títulos propios”. Unibasq clarified that these activities were not listed in its application for renewal of registration because Unibasq “realized that it was more a consultancy activity as Unibasq just provides an external expert report” and thus did not consider them as activities within the scope of ESG. In support of its classification, Unibasq stated that it acted only as a subcontractor to the UPV/EHU and had no own responsibility for the review process or the outcomes. The Register Committee also noted that Unibasq does not provide “accreditation” of “títulos propios”, contrary to what was published by UPV/EHU. Unibasq, however, stated on its website that it “will evaluate and certificate” those degrees. Unibasq further noted that the misunderstandings were caused by a discrepancy between the internal regulations of the UPV/EHU and the public information on their website, stating that some programmes are accredited by Unibasq. Having considered Unibasq's response, the Register Committee accepted that the evaluation of “títulos propios” may be classified as consultancy service performed by Unibasq to UPV/EHU. The Register Committee further considered how Unibasq ensured a clear distinction from its external quality assurance activities within the scope of the ESG (see EQAR Policy on the Use and Interpretation of the ESG, standard 3.1 and Annex 5). The Committee noted that such a clear distinction was particularly crucial in this case, given that the terminology and the characteristic of the activity caused an actual risk of confusion with ESG activities. The Register Committee concluded that the presentation on Unibasq's website was misleading and did not ensure clarity as to the different nature of these evaluations; it thus considered that Unibasq did not comply with the standard. In its additional representation, Unibasq stated that it held specific meetings with the UPV/EHU, sent a formal letter regarding this issue and elaborated a new agreement with the UPV/EHU, which was approved by Unibasq's Governing Council. As stated in the agreement, the*

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<sup>4</sup> If the ENQA Board deviated from the recommendations made by the review panel, the Board version of the recommendation is referred to.

<sup>5</sup> EQAR conclusions are only referred to when they go beyond assessments and include reasoned deviations from the assessments made by the review panel.



evaluations of “*títulos propios*” are consultancy activities which cannot be represented as “Accredited, validated or reviewed by Unibasq”. In addition, Unibasq removed from its website the information that could have been misleading about “*títulos propios*” previously. The Committee, however, noted that UPV/EHU continues to refer to an “external report” by Unibasq in its advertisement of “*títulos propios*”. The Register Committee welcomed Unibasq’s steps that were taken to clarify the status of this activity and to avoid further misinterpretations. At the same time, the Register Committee considered that it cannot be fully determined at this stage whether the new communication is fully clear to all stakeholders and avoids any misrepresentation; this should thus be analysed in the next external review of Unibasq. **The Register Committee remained unable to concur with the panel’s conclusion of compliance but concluded that Unibasq now complies partially with standard 3.1”.**

## Evidence

Unibasq is a state-owned body governed by private law that has been created under Article 79 of Act 3/2004 on the Basque University System. The agency is mandated by the Basque government to pursue external quality assurance in higher education. Its responsibilities as determined in Act 13/2012 of 28 June 2012 and -based on the act- in Unibasq’s statutes approved by Decree 204/2013 include evaluation, accreditation, and certification of quality in the Basque University System. Furthermore, the agency’s remit includes QA activities outside the scope of the ESG namely evaluation of scientific staff and research.

During the period 2018-2023 Unibasq’s activities in the field of external quality assurance within the scope of the ESG have been the following:

	2018	2019	2020	2021	2022	2023
Reviews at programme level	123	216	332	156	139	45
Reviews at institutional level	19	9	10	5	9	10

During the site visit the review panel learned that the number of programme accreditations will stay at a significantly lower level compared to the years 2018-2022 because of the implementation of re-accreditation of university centres which replaces programme accreditation.

Unibasq’s mission is “*To help improve the Basque university system by promoting its quality and taking into account the interest groups involved in higher education.*” It is complemented by the vision that “*Unibasq carries out its activities independently, transparently, objectively, effectively and competently, basing itself on international standards that guarantee quality in higher education.*” Together with these, Unibasq publishes on its website underlying values for its operations that include among others independence and autonomy, transparency, user orientation, respect for autonomy and diversity of universities, collaboration with stakeholders and continuous improvement.

The agency has a Strategic Plan (2020-2023) which presents three strategic lines namely 1. Services: Evaluation, Accreditation, Counselling and Foresight, 2. Projection and Relationship with the Environment, 3. Management, Resources and People. These strategic lines are translated into strategic objectives and action lines. The Strategic plan is the reference for developing annual management plans that direct the daily activities. At the time of the site visit Unibasq was about to begin drafting the new strategic plan; this process was slightly postponed to make use of the findings of the opportunity for internal and external evaluation provided by this ENQA review.

Unibasq has a governance structure that is determined by the statutes and includes a Governing Board, an Advisory Board, a Students’ Consultative Committee, various Evaluation Committees, and an Ethics

and Guarantees Committee. The composition of the governance bodies is regulated in the statutes and assures involvement of stakeholders namely representatives from academia and from students and also representatives from outside the Basque region. At the core of stakeholder involvement in Unibasq's governance is the Advisory Board whose role goes beyond giving general advice and includes decision-making functions; one of its core responsibilities is approval of methodologies. The involvement of stakeholders in review activities at programme and institutional level is regulated and guaranteed by the Unibasq Act. This Act also applies to review panels and to the Evaluation Committees. Professionals with a proven track record in the knowledge area to be evaluated are involved as participants in the committees for the evaluation of study programmes, and quality assurance experts are part of the Institutional Accreditation and Quality Systems Certification Committee.

## **Analysis**

The numbers of conducted reviews demonstrate that Unibasq undertakes EQA activities as defined in Part 2 of the ESG on a regular basis. The role as external QA agency for higher education is determined by its legal mandate, and the agency has been fulfilling this mandate since its foundation. The panel wants to emphasize as a relevant feature that Unibasq's legal mandate goes beyond EQA within the scope of the ESG. The mission statement gives direction for Unibasq's activities with two aspects to be emphasized: Firstly, the improvement of the Basque University System translates into the recently started comprehensive reorientation of its QA activities towards enhancement -which will be discussed later in this report-, secondly, the consideration of the relevant positions of interested parties translates into close collaboration with stakeholders. During the site visit, especially in the meetings with representatives from the government and with other stakeholders the panel learned how much these appreciate the role Unibasq plays in the university system and its general contribution to the development of higher education, research and innovation and its role in the context of thematic analysis.

The panel commends Unibasq for the close collaboration with and involvement of its stakeholders. During the site visit the panel learned that stakeholders are involved on a regular basis in the development of review methodologies etc., and that they use direct communication channels on a regular basis. It is worth mentioning that Unibasq developed the Label procedure in response to discussions with stakeholders from industry about strengthening employability and the collaboration between universities and industry. This is one example of the close collaboration with stakeholders not only in reviews but also in further developing quality assurance and the higher education system in general. Stakeholders of all kinds confirmed the important role of Unibasq in bringing together stakeholders in such developments. The bond among Unibasq and HEIs has been strengthened since 2018, especially during the COVID-19 pandemic, when Unibasq and HEIs had meetings every week. The panel was pleased to learn about the high appreciation of Unibasq by stakeholders.

At the same time the panel wants to mention that the stakeholder representation in Unibasq's governance bodies is slightly imbalanced because academics dominate the membership (apart from the Student Consultative Committee) whereas stakeholders such as social partners are not represented, particularly in the Advisory Board. Although the collaboration with stakeholders on a day-to-day basis is close and feedback from all stakeholders about their involvement in the agency's activities was very positive and although the review panel did not hear complaints about this situation, it suggests that Unibasq considers broadening the formal stakeholder representation in the agency's governance bodies, namely the Advisory Board.

The broad legal mandate translates into Unibasq's strategic plan which contains goals and objectives that guide its operations through well written and detailed annual management plans. It is worth noting that the strategy takes into consideration the overall strategy for higher education, research and

innovation of the Basque government and is hence not an isolated document but demonstrates the important contribution of the agency to the development of the entire system.

**As far as the 2018 review recommendation and the 2019 EQAR conclusions are concerned,** the panel confirms the statements made by Unibasq in the relevant communication with EQAR after the last review and in the Follow-up report that was submitted to ENQA in 2021. Unibasq removed all information about “títulos propios” from the section related to study programmes and the different review procedures and from the webpage in general. As a consequence, only procedures that are within the scope of the ESG are presented as external quality assurance procedures in the relevant sections of the website. In so doing, Unibasq avoids misunderstandings about the nature of its activities within the scope of the ESG. On the other side, the panel is of the opinion that not mentioning consultancy activities regarding “títulos propios” at all, does not give clarity about the nature of these activities. An alternative but not necessarily better solution would have been to not just erase this information but to put it in another section of the website together with a clear statement about which activities fall under the ESG and which do not.

The panel wishes to emphasize that Unibasq has made all possible efforts to request from HEIs not to use misleading information on their websites and has succeeded as far as the panel could determine through an internet search. The panel wishes to emphasize that if HEI publish incorrect information, this is outside Unibasq’s responsibility. In conclusion, Unibasq had already addressed the 2018 review recommendation and the 2019 EQAR conclusions appropriately by 2021.

In conclusion, the panel confirms that Unibasq has a clear strategy that translates into planning of daily activities and that the agency involves stakeholders effectively in its operations.

#### **Panel commendation I**

The panel commends Unibasq for the close collaboration with and involvement of its stakeholders.

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

The panel encourages Unibasq to strengthen formal involvement of stakeholders beyond academics in its governance bodies, namely in the Advisory Board.

#### **Panel conclusion: compliant**

## **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

### **ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE**

Standard:

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

#### **2018 review recommendation:**

*“Unibasq is recommended to integrate the concept of student-centred learning as a core element in the agency’s work and in its procedures (ESG 1.3)”*

#### **Evidence**

Unibasq carries out various external QA activities, both compulsory and voluntary. Since the previous review of the agency in 2018, several changes to the law have been introduced, notably Organic Law

2/2023 of 22 March on the University System, Decree 90/2022 of 19 July, Royal Decree 822/2021 of 28 September and Royal Decree 640/2021 of 28 July. Although none of them directly affects the activities carried out by Unibasq, they imply certain changes to existing procedures.

Apart from changes to activities already in place, since the last review of the agency in 2018 several new QA activities have been fully carried out (being introduced previously, but with no completed procedures). Examples include the procedure for the accreditation renewal of study programmes outside the Basque University System, the Label regarding dual education and the first stage of Institutional Accreditation of university centres (schools and faculties).

Institutional Accreditation has already started as a pilot procedure during 2023, while the procedure for the ex-post evaluation of artistic study programmes has already resulted in one master programme's accreditation being renewed. Remaining activities (i.e. Labels, Accreditation renewal of study programmes outside the Basque University System and CeQuint Certification), while also deemed to be subject to the ESG, are voluntary.

Correspondence between Unibasq's external QA activities regarding study programmes and standard of Part I of the ESG is presented below. This table is adapted from Annex I of Unibasq's SAR.

Study programmes										
ESG part I	Ex-ante Accreditation and Authorisation	Modifications	Follow-up	Accreditation renewal of study Programmes (including joint programmes)	Accreditation renewal of study programmes (outside the Basque University System)	Labels – Dual & International	Ex-ante evaluation of master programmes in the arts	Ex-post evaluation of artistic study programmes	CeQuint certificate programme	European Approach for QA of Joint Programmes
1. Policy for quality assurance	9	9	3	3	3	8	9	3	1	9
2. Design and approval of programmes	2, 5, 8	2, 5, 8	1	1	1	2,5	2, 5, 8	1	2a, 3a	2, 3
3. Student-centred learning, teaching and assessment	5, 8	5, 8	1, 6	1, 6	1, 6	5	5, 8	1, 6	3, 2b	5
4. Student admission, progression, recognition and certification	4	4	1.4, 1.5	1.4, 1.5	1.4, 1.5	4	4	1.4, 1.5	5, 2c	4
5. Teaching staff	6	6	4	4	4	6	6	4	4	7
6. Learning resources and student support	7	7	5	5	5	7	7	5	3c, 4c, 5a	6, 7
7. Information management	8, 9	8, 9	3, 7	3, 7	3, 7	8	8, 9	3, 7	*	9
8. Public information	4	4	2	2	2	4	4	2		8
9. On-going monitoring and periodic review of programmes	8, 9	8, 9	1, 3	1, 3	1,3	8	8, 9	1, 3		9

<b>10. Cyclical external quality assurance</b>	Once the programme is accredited it must undergo a review every 6 years	Once the programme is accredited it must undergo a review every 6 years	Every 5 years	Once the programme is accredited it must undergo a review every 6 years	Every 5 years	Every 6 years
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Criteria marked with an asterisk (\*) are not applied to CeQuint certification procedures, since, according to the framework, “The assessment of internationalisation is voluntary, and it does not substitute existing external quality assurance or accreditation procedures. An assessment of internationalisation may be combined with regular external quality assurance procedures, but it is a supplementary and improvement-oriented service. This means that the Certificate for Quality in Internationalisation can only be awarded to programmes and institutions that have been externally quality assured, though not necessarily at the same level.” Thus, they are assessed in regular accreditation procedures for study programmes.

The mapping covering institutional-level procedures is presented below. This table is adapted from Annex I of Unibasq’s self-assessment report.

ESG part I	Institutional			
	AUDIT	DOCENTIA	Institutional accreditation	CeQuint certificate Institutional
<b>1. Policy for quality assurance</b>	1	1	1	1, 2, 4, 5
<b>2. Design and approval of programmes</b>	2	2	2	1c, 2b
<b>3. Student-centred learning, teaching and assessment</b>	3	2	3	1c, 2b
<b>4. Student admission, progression, recognition and certification</b>	3	n/a	3	2b
<b>5. Teaching staff</b>	4	1, 2, 3	4	2b
<b>6. Learning resources and student support</b>	5	2	5	2c
<b>7. Information management</b>	6	2, 3	6	3b, 3c
<b>8. Public information</b>	7	1, 3	7	3a
<b>9. On-going monitoring and periodic review of programmes</b>	2	2, 3	8	4
<b>10. Cyclical external quality assurance</b>	Every 6 years	Every 5 years	Every 6 years	Every 5 years

## **Analysis**

The application of parts of ESG part I are discussed below:

### **1. Policy for quality assurance**

Having comprehensive quality assurance policies is considered mandatory by Unibasq and hence it is reflected in all types of evaluations currently being conducted by the agency. Within this area, both presence and implementation of QA policies are considered with the inclusion of different stakeholders' feedback.

### **2. Design and approval of programmes**

Multiple types of accreditations in the Basque Country deal with programme design, specifically Ex-ante accreditation and Authorisation, Modifications, Accreditation renewal of study programmes (including joint programmes) and follow-up. Since AUDIT and Institutional Accreditation procedures focus on university centres, they put emphasis on not only the design, but also approval procedures for programmes.

### **3. Student-centred learning, teaching and assessment**

In the previous review of Unibasq, this standard was found to be lacking a common understanding of its purpose. With regards to the recommendation from the last review about further integration of student-centred learning as a core concept (ESG I.3), Unibasq has made necessary changes to the procedures, building on the lessons learnt from the INNOMETH project. This has been demonstrated both in the documents provided by the agency and in meetings with various stakeholders during the site visit. In the "Guide to standards and criteria for the renewal of Institutional Accreditation of University Centres" the description of Criterion 3 clearly deals with "Deployment and implementation of the centre's student-centred academic project". In general, the focus of the agency in evaluating student-centred learning in its reviews can be clearly seen, both within the documentation provided and according to stakeholders interviewed.

### **4. Student admission, progression, recognition and certification**

As part of the assessment criteria for all types of study programs, this standard is addressed when evaluating the qualifications expected from applicants, the admission procedures, and the academic rules relevant to the programme. Hence, it is encompassed within a respective evaluation of admission review. The fitness of academic recognition procedures is evaluated by the experts during accreditation renewal procedures.

### **5. Teaching staff**

This standard is considered by Unibasq in all procedures. It should be noted that Unibasq has the responsibility of evaluating individual candidates before they start working as a teacher at higher education institutions. While this activity does not fall within the scope of this review, it is crucial to the work of Unibasq. One of the procedures operated by Unibasq (DOCENTIA) focuses specifically on the quality of individual teaching staff members. Amendments have been made to include stronger emphasis on student-centred learning within this procedure, which the panel notes positively.

### **6. Learning resources and student support**

This standard is considered by Unibasq in all procedures, in most cases dealing with support staff and services for students. With regards to institutional procedures, DOCENTIA does not consider student-related matters directly (although it can be reviewed indirectly); however, these are explicitly reviewed within the AUDIT and the Institutional Accreditation procedure.

## **7. Information management**

Institutions reviewed by Unibasq are required to demonstrate a systematic approach to data collection and analysis. Within programme reviews, this standard is analysed with regards to internal quality assurance. Reviews at institutional level explicitly require analysis of the collected data.

It should be noted that Unibasq maintains a custom-made web service called Observatory of the Basque University System, which allows the public to see quantitative data on various programmes being offered by the Basque Country universities. The website, while simple, presents the data effectively, which allows for an overview on how the system works, even if the reader is not familiar with local laws and regulations.

## **8. Public information**

Public information is a vital aspect of Unibasq's external quality assurance processes. The agency places significant emphasis on the publication of information by educational institutions. Various evaluation procedures, including ex-ante accreditation and modifications, and Institutional Accreditation, assess this in relation to student information and admission. The follow-up and ex-post accreditation processes include a specific standard related specifically to this aspect.

## **9. On-going monitoring and periodic review of programmes**

This standard is considered by Unibasq in all procedures, and it is in the centre of Institutional Accreditation. Emphasis is put on internal procedures and this has been confirmed and appreciated by different stakeholders.

Approval, monitoring and periodic review of programmes are reviewed as crucial components of the AUDIT procedure. The DOCENTIA procedure does not cover reviews of the programmes but considers the internal processes dealing with quality assurance that are related to the teaching staff.

The aforementioned aspects are addressed within the expected outcomes and the quality assurance system (for Bachelor's and Master's degrees) and when assessing the revision, enhancement and outcomes of the programme (for Doctoral programmes). They are also addressed as part of the evaluation of the internal quality assurance system during the follow-up. As for the ex-post accreditation, these aspects are included in the criteria dealing with programme organisation and development and with internal quality assurance.

## **10. Cyclical external quality assurance**

The compliance with this standard is guaranteed through local law, where specific periods between external reviews of both programmes and institutions are defined. In most cases this is once every 6 years, but in some (DOCENTIA, CeQuint and Labels) it is one every 5 years.

**As far as the 2018 review recommendation is concerned**, as mentioned previously Unibasq amended the standards of the various procedures and engaged in awareness-raising activities with universities.

In conclusion, the panel emphasizes that consideration of the effectiveness of internal quality assurance can be seen in all the activities conducted by Unibasq that were in scope of this targeted review. Given the evidence provided by the Agency in the SAR and discussions with stakeholders it can be concluded that ESG part I is fully and comprehensively addressed in the activities mentioned above, regarding both study programmes and institutional reviews.

## Panel commendation 2:

The panel commends Unibasq for its efforts regarding opening access and publishing data on study programmes within the Basque Country on a custom-made website called Observatory of the Basque University System.

## Panel conclusion: compliant

## ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

## 2018 review recommendation:

*“The panel recommends the agency to further develop its quality assurance procedures in order to further increase the fitness for purpose of the whole external quality assurance system, aiming for better balance between qualitative and quantitative approaches.*

*The panel recommends to involve the Advisory Board more often at a strategic level in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.”*

## Evidence

Unibasq’s QA procedures are described in their internal documents, which are approved by Unibasq’s Advisory Board, and which define their aims and objectives in accordance with Spanish and regional laws, regulations and the ESG. These documents are published on Unibasq’s website.

Unibasq takes a collaborative approach to developing its QA procedures. As explained in the SAR, the agency’s technical staff prepares the draft documents for the procedures, before they are sent to the Advisory Board, which discusses the drafts and, if necessary, adds modifications or changes, and approves them. The board includes: academics, students, quality assurance professionals and international experts.

The drafts of these procedures are discussed in advance with HEIs. If the draft concerns the Basque University System, such topics are included in periodic meetings with HEIs. Such statements were strongly supported by the interviewees during the site-visit, where different stakeholders (representatives of HEIs, the Basque Education Department and the labour market) confirmed very close connection and cooperation with Unibasq, to tackle problems and find possible solutions.

In particular, the representatives of the labour market (e.g., Euskalit, Confebask) were very positive about being actively involved in the drafting and implementation of processes, especially in Label procedures. In addition, different stakeholders (members of the expert panels, Evaluation Committees, Student Consultative Committee, etc.) stated that Unibasq always seeks feedback, propositions, and the discussion of different problematic aspects. The agency provides various ways to provide such feedback such as surveys, direct contact, e-mail, etc.

The new QA procedures, Institutional Accreditation and Labels are good examples of this collaborative approach. Stakeholders have been involved intensively in the design of the methodologies



and procedures through regular meetings and informal interactions with Unibasq and through their involvement in the preparation of the Basque University-Business Strategy. This collaboration occurs both formally through the Unibasq Committees and the Advisory Board, and informally through constant interaction with the agency. With regard to HEIs, for instance, the panel learned during the site visit that the procedure for the renewal of Institutional Accreditation has included the regular involvement of the IQAS units at HEI centres. Interaction and cooperation with economic and social agents in the Basque Country, particularly with the two main associations Euskalit and Confebask are also especially notable in relation to the Dual Label. For example, in the meetings held during the site visit, the panel found out how, at the initiative of one of the most important stakeholders (Euskalit), the agency is promoting the use of the self-assessment model Advanced Management Model (AMM) for some of the assessment procedures, such as the renewal of Institutional Accreditation. Therefore, this model has been included in the Unibasq 2022 “Guide to standards and criteria for the renewal of Institutional Accreditation of university centres” (p.5). The final decision of new revised QA procedures is taken by the Advisory Board.

The stakeholders mentioned the changes in the Basque QA system and its shift towards a qualitative approach with a focus on enhancement; in particular, the role of the new institutional re-accreditation was highlighted in this context. Different stakeholders demonstrated their appreciation of Unibasq’s guiding role in addressing local problems, as well as embedding national requirements (implementation of Royal Decrees, participation in REACU and etc.) in their procedures and were very positive about it.

**Institutional Accreditation:** Multiple interviewees confirmed that Institutional Accreditation is a core instrument to achieve the goal of shifting towards the qualitative approach. If Institutional Accreditation is renewed successfully, external accreditation of study programmes is not carried out and HEIs are entrusted with the QA at study programme level.

At the time of this review, Basque Universities were participating in the pilot evaluation against the renewal of Institutional Accreditation procedure, so their representatives were able to give their first impressions about this procedure. The review panel was informed that the procedure is clear, and generally it addresses their expectations.

**Ex-post evaluation of artistic master level study programmes:** The purpose of this procedure is to evaluate the Artistic Study programmes of the Basque Country Higher Education in order to issue a report for their official approval by the Education, Culture and Sports Ministry. For these purposes the agency decided to apply the well-established methodology of ex-post accreditation renewal, which was already judged as compliant with ESG 2.2, ensuring that artistic programmes would meet specific requirements, set in Spanish national legal acts.

**Labels:** All of the stakeholders that were interviewed, brought the review panel’s attention to the Label procedures. They were extremely positive about this newly introduced voluntary procedure and were satisfied with Unibasq’s key role among other Spanish agencies. The procedures focus on different parameters: orientation towards labour market (Dual) and state of internationalisation (International) and were highlighted during the site visit as very important to the whole Basque system with the potential to be transferred to the national level.

**CeQuint:** CeQuint was introduced as a result of an international Erasmus+ project. This methodology can be used to evaluate the level of internationalisation at both institutional and programme level. If successful, the applicant is awarded with the Certificate for Quality in Internationalisation by the European Consortium for Accreditation (ECA). Although Unibasq was not a part of the project, but a member in ECA, it decided to implement this procedure as well.

**Ex-post evaluation of study programmes outside the Basque system:** This procedure is also voluntary and is performed according to the already existing methodology of the renewal of accreditation of study programmes, but without the specific requirements of the Spanish and Basque regulations, taking into consideration the context of the study programme. The agency has chosen to specify the outcomes and criteria with the foreign higher education institution and Chilean accreditation agency; this practice was deemed positive by the representatives of the foreign HEI who met with the panel during the site visit.

## **Analysis**

The review panel commends the agency for the level of stakeholder involvement in designing methodologies. Although there are formal ways to involve different stakeholders in internal bodies, e.g. Governing Board, Advisory Board, Evaluation Committees, etc., the level and ways of informal stakeholders' participation is much broader. All interviewees met by the review panel were very engaged in Unibasq's activities. The communication with HEIs, that was strengthened during the Covid-19 pandemic, is a very positive trend, which ensures better understanding and movement towards mutual goals. All the stakeholders, including labour market and students' representatives felt very confident during meetings and expressed their trust towards Unibasq, their competences and their importance in QA system. The review panel also concluded after the site visit that Unibasq and the Basque Education Department have very strong partnership bonds.

During interviews HEIs, the Basque Education Department, students and labour market representatives confirmed that Unibasq's compulsory and voluntary QA activities are addressing the main issues that Basque education system is facing (for example student centered learning, student satisfaction, teaching staff and etc.) and emphasized that the shift towards qualitative approach and quality enhancement is very positive.

The review panel witnessed that, according to the HEIs representatives, the pilots for Institutional Accreditation that were still ongoing at the time of the site visit have already had a very positive impact to the internal QA systems of those involved, in particular in relation to quality enhancement. During the interviews the representatives of HEIs referred to a certain evaluation fatigue caused by countless procedures of ex-post accreditation of study programmes and emphasized that the new approach was very useful and strengthening their autonomy. Design and implementation of Institutional Accreditation play a core role in the general development to shift towards a qualitative approach and focus on the enhancement, however it is fair to say that the accreditation system is only on its way. Assessing the effective accountability of HEIs as opposed to ensuring that they meet the minimum educational, organizational, financial, procedural and logistic requirements has so far not been in the focus and the change is challenging for HEIs and the agency. Nonetheless the move towards the more qualitative approach currently reflected in European trends is timely. A sound framework for doing so is through the implementation of the renewal of Institutional Accreditation. In fact, it is clear from what the panel learned during the site visit that the pilot phase being carried out by Unibasq, including its formal and informal discussions with the various actors, is leading Unibasq and the HEIs to redirect their efforts towards revising their indicators and better targeting the focus of evaluations. In contrast, a system of periodic external accreditation of all study programmes appears to be unsustainable, so the move to a more decentralized model aimed at strengthening the autonomy of HEIs is welcomed by the stakeholders. In the review panel's view, it is also seen as a sign of the system's maturity. The review panel wishes to emphasize the important role of the pilot evaluations that give participating HEIs and Unibasq the opportunity to test the methodology and make revisions, if necessary, which was highly appreciated by interviewees.

Regarding the other new QA procedures, the review panel has observed that the establishment of the Labels (more specifically Dual) procedures is an outstanding example of fruitful cooperation of QA

agency, HEIs and labour market representatives to establish a procedure, especially to strengthen employability and collaboration between HEIs and industry. Unibasq has demonstrated leadership in shaping this methodology and promoting it on the national level and the stakeholders appreciate this role very much. On the one hand, the Dual Label recognizes the quality of study programmes in relation to the development of students' transversal skills linked to employability. Since 2016, this has been a strong driving force in the Basque University System and constitutes an important axis of the Basque University-Business Strategy 2017-2022 and 2022-2026 and the Basque Government's Plans for the Basque University System 2019-2022 and 2023-2026. The Basque Country is a pioneer in the introduction and development of the Dual Label, to the extent that the Unibasq protocol is becoming the model followed by REACU to apply the label across the entire Spanish university system. On the other hand, as part of the Basque government's aim to internationalize the Basque University System and as one of the central axes of the Basque Government's University System Plan and Unibasq Strategy, the Internationalization Label recognizes and promotes efforts to improve the international dimension of Basque HEIs' study programmes.

The review panel supports Unibasq's initiatives and plans to introduce this methodology to a broader audience in future.

The panel was also impressed by the Observatory of the Basque University System (Behatokia). This online tool that aggregates different data concerning studies performed in Basque University System, together with the evaluation results, could be an extremely useful tool to further explore the fitness for purpose of the procedures and their practical application.

Although Unibasq performs a number of different QA procedures, the introduction of new or modified procedures did not cause any cases of overlap. The aims and outcomes of these procedures are complimentary to the existing ones and, taken as a whole, provide a logical and solid QA framework.

In conclusion, it is the review panel's view that Unibasq successfully uses a very collaborative approach to design and review its new and existing QA procedures, especially institutional accreditation and Labels to strengthen the relevant purposes.

**As far as the 2018 review recommendation is concerned**, the review panel was in no doubt that Unibasq has properly addressed the recommendation to move towards the qualitative approach, that was recommended in the 2018 review. All stakeholders testified that the Basque system, with the strong leadership of Unibasq, is further moving towards a more qualitative approach and with a modified institutional approach the agency has taken important steps in this process. Without doubt the Advisory Board plays a crucial role in this development, as it actively participates in both shaping and approval of Unibasq's methodologies.

### **Panel commendation 3**

The panel commends Unibasq for its involvement of stakeholders in shaping methodologies which is very active and fruitful.

### **Panel commendation 4**

The panel commends Unibasq for the revised Institutional Accreditation that has initiated real impact for HEIs and their internal QA systems.

### **Panel commendation 5**

The panel commends Unibasq for being instrumental in shaping and developing Label procedures, that demonstrate the synergies between HEIs and labour market.

## Panel conclusion: compliant

### ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

#### 2019 EQAR conclusion:

*“The external review panel noted that for (voluntary) international accreditation procedures “the full responsibility to request any kind of follow-up lies in the hands of the institution”. The Register Committee considered the clarification by Unibasq that it follows up programmes' improvement plans in its international quality assurance activities, which is mentioned in the relevant protocol. **Having considered Unibasq's clarification, the Register Committee was able to concur with the panel's conclusion of compliance. The Register Committee, however, encouraged Unibasq to look into possibilities to strengthen its follow-up procedure for (voluntary) international reviews, and to clarify the expectation towards HEIs regarding the follow-up.”***

#### Evidence

Each QA procedure that falls under the scope of the Terms and References is defined in separate documents which are published on the agency's website.

**Accreditation of study programmes outside the Basque University System:** Accreditation of study programmes outside the Basque University System are carried out “on the basis of prior agreements signed with other regional, national or foreign agencies, universities or educational authorities” (SAR p. 9). Agreements have been reached with the Universidad de Aconcagua (Chile) for the accreditation its Law degree, and with AccreditAcción, a Chilean agency, to prepare a methodology for accreditation aligned with international standards (ESG), which has been used for the accreditation of the Civil Engineering degree at the Universidad Tecnológica Metropolitana.

Although specific elements are included to better address the context, the procedure is essentially the same one used in the accreditation (renewal) of Basque study programmes. Unibasq 's specific 2018 “Protocol for the accreditation of university degrees (bachelor's and master's level) external to the Basque University System” defines the scope and purpose, all the procedures and the evaluation criteria, and it can be found on the Unibasq website, together with the reports of expert panels, the reports of the Unibasq Evaluation Committee and the final decisions from Unibasq. The procedure starts with an HEI's self-assessment report and follows with an on-site visit from the expert panel that will prepare the assessment report. The report is then sent to the Evaluation Committee, which draws up its own preliminary report to which the HEI can submit allegations or comments. Once those have been reviewed and addressed, the Evaluation Committee adopts its final report, which is published on the Unibasq website. This procedure includes follow-up monitoring.

**Label (Dual and International):** Obtaining the UNIBASQ labels is voluntary in its first stage. By contrast, Label renewal is part of the regular process involved in the renewal of the accreditation of

study programmes, where the labels are incorporated as an additional element in the overall process (i.e. the same dimensions are reviewed, including specific criteria on dual learning and internationalization).

The 2020 Unibasq “Protocol for obtaining recognition of dual training for official university degrees and master's degrees” and the REACU 2022 “Evaluation Protocol for the inclusion of the Dual Mention, according to RD 822/2021”, set out the scope and framework, all procedures and the assessment criteria for the Dual Label, while the procedure for the Internationalization Label is set out in detail in the 2022 “Protocol for obtaining recognition of internationalization for official university bachelor’s and master's degrees”, which establishes the scope and framework, together with all procedures and assessment criteria.

Nowadays, the initial procedure for both labels start with a submission from an HEI and follows with a desk-based report by the Unibasq Vectors Committee to which the HEI can submit allegations and comments. Once those are reviewed and addressed, the Vectors Committee approves the final report, which is published on the Unibasq website. Subsequently, the renewal procedure for any label follows the regular process for renewal of the accreditation of study programmes. As noted earlier, therefore, this renewal includes an on-site visit by a panel of experts as part of the renewal of the accreditation of study programmes, which draws up an evaluation report and sends it to the Evaluation Committee that includes the Label’s renewal in its decision on renewal of the accreditation of study programmes. Accordingly, the Evaluation Committee prepares its report, which is sent to the HEI for allegations and comments and, once those have been reviewed and addressed, the Committee’s final report is sent to the Spanish Council of Universities. This is followed by the monitoring activities that in case of failure to meet the requirements might lead to the withdrawal of the of Quality Label.

Royal Decree 822/2021 establishing the organization of university education and the procedure for QA provides a general regulation governing dual labels for bachelor's and master's degrees and establishes the general procedure for their award, to be developed by the Spanish QA agencies. A transitional clause requires that any study programmes that have been granted dual recognition by a Spanish agency must request their modification in order to adapt them to the requirements set out in the aforementioned regulation. These modifications must be processed as substantial modifications of study programmes in accordance with the ex-ante verification process. Therefore, once the dual model is implemented at State level, for which REACU has already approved the 2022 “Evaluation Protocol for the inclusion of the Dual Mention”, the protocol drawn up by Unibasq will require some adjustments and adaptations and any current study programmes affected are supposed to undergo the substantial modification/verification procedure. This is obviously one of the issues that is now the focus of a significant amount of work at Unibasq.

**CeQuint Certification:** The Erasmus+ CeQuint project has developed a methodology for assessing the quality of internationalization in HEIs in order to grant the ECA Certificate of Quality in Internationalization. Unibasq as a member of ECA carries out these assessments.

The procedure follows guidelines laid out in ECA’s 2015 “Frameworks for the Assessment of Internationalization” and 2017 “Guide to Assessing the Quality of Internationalization”, which set forth the framework for action, the procedures, the evaluation criteria, and the templates to be used, and can be accessed through the Unibasq website. The procedure includes a self-assessment report, an expert panel on-site visit, a preliminary panel evaluation, and a final evaluation by ECA. So far, two evaluations have been carried out at two Spanish private universities owned by the San Pablo CEU University Foundation (Universidad CEU San Pablo and Universidad Cardenal Herrera). Although this framework does not include follow-up step, Unibasq has decided to apply its’ regular follow-up procedure in practice.

**Ex-post evaluation of artistic study programmes (Masters):** This is a procedure for renewal of the accreditation of any HEI artistic study programmes (music, dance, theatre, conservation and

restoration of cultural heritage, design, fine arts) at masters level that have already been accredited by the Ministry in charge of Education.

Initial accreditation (ex-ante accreditation) is carried out in accordance with the general procedure established in REACU's 2022 "Protocol of evaluation for the Verification of syllabuses of university studies leading to the award of official Bachelor's and Master's degrees" and in the 2023 UNIBASQ "Guidelines for the Verification-Authorization, Monitoring, Modification and Accreditation of Official Bachelor's and Master's Degrees". The specific criteria are set by the regulation for this kind of artistic programmes. It consists of a desk-based report drawn up by the Evaluation Committee. The report is sent to the HEI for allegations and comments and, once those are reviewed and addressed, it is sent as a final report to the corresponding Ministry, which makes the final decision. UNIBASQ's procedures for follow-up (through its own internal evaluation indicators and the information available, together with the monitoring reports carried out by the HEI three years after implementation or renewal) and for any substantial modification of the study programmes (through a procedure analogous to the ex-ante accreditation) are also established and organized on the basis of REACU's 2022 "Protocol of evaluation for the modification of syllabuses of university studies leading to the award of official Bachelor and Master's degrees".

For renewal of the accreditation of master's degrees, the procedure is also based on Unibasq's "Support guide for the assessment of Master's degrees in arts education", which offers a basic template to guide the preparation of the evaluation panel's report. The accreditation renewal procedure already includes an on-site visit by a panel of experts, which draws up the evaluation report and sends it to the Evaluation Committee (Arts and Humanities sub-section). The latter then prepares its own evaluation report and sends it to the HEI for allegations and comments. Once those have been reviewed and addressed, the Evaluation Committee draws up the final report and UNIBASQ sends it to the corresponding Ministry, which makes the final decision.

**Institutional Accreditation:** Renewal of Institutional Accreditation, which takes place six years after the initial accreditation, is now a core activity of Unibasq. In addition, the REACU 2022 "Procedure for the evaluation of degrees taught in various centres within the framework of the protocols for Institutional Accreditation of university centres", Unibasq developed its own 2022 "Guide to standards and criteria for the renewal of Institutional Accreditation of university centres". The Guide constitutes an adaptation to the requirements of RD 822/2021 and takes as a reference the aforementioned resolutions and the documents drawn up by REACU (2020 "Protocol for the renewal of the Institutional Accreditation of university centres" and the 2022 "Procedure for the evaluation of the cases of degrees taught in several centres in the framework of the protocols of Institutional Accreditation of University Centres").

Basically, the procedure for the renewal of Institutional Accreditation consists of the preparation by UNIBASQ of a preliminary cross-cutting contextual analysis of the different aspects to be assessed; the preparation of a self-assessment report by the HEI center; the on-site visit of a panel of experts; the panel's issuing of the report, which is sent to the Institutional Accreditation Committee; the issuing of a preliminary report by said Committee, which is sent, in turn, to the HEI center in case it wishes to submit any allegations and comments. The procedure ends with the adoption of the final report by the committee and its referral to the Spanish Council of Universities, which is responsible for making the final decision. Next step for HEIs and Unibasq is a follow-up procedure.

The table below provides an overview that most of the procedures include self-assessment, external review, site visit and report. HEIs have the right to submit an appeal against the decision, and procedures include the step of follow-up (from SAR):

Evaluation procedure	SAR	External review	Site visit	Appeals	Report publication	Follow-up
Accreditation renewal of study programmes outside the Basque University System	x	x	x	x	x	x
Labels - Dual	x	x	*	x	x	x
Labels International	x	x	*	x	x	x
CeQuint certification	x	x	x	x	x	**
Ex-post evaluation of artistic study programmes	x	x	x	x	x	x
Institutional accreditation	x	x	x	x	x	x

\* The Labels procedures are desk-based reviews and no site-visit is included. Nevertheless, as the study programmes are already accredited and will have to undergo a reaccreditation either at programme level or as part of an institution, the site visit is included at some stage of the programme review.

\*\* In the case of CeQuint certifications, the framework doesn't establish a specific follow-up procedure; it is the regular follow-up procedures of the Agency which apply.

However, Labels (both Dual and International) and CeQuint Certification have specific features:

The procedure of Label (both Dual and International) is specified as “desk-based” and does not include a site visit. However, these certificates are issued to already accredited study programmes and the level of the compliance with the Label requirements would be evaluated again during the following cyclical procedures (e.g. Institutional Accreditation) which includes the site visit, e.g. the stage when the stakeholders are interviewed.

In case of CeQuint certification, the methodology that was established by the international Erasmus+ CeQuint project does not involve specific follow-up step. In the SAR and during the interview with the agency's staff the agency explained that in this procedure they perform their regular follow-up procedures.

During the site visit the review panel investigated the issues of consistency of the reports and decisions. The review panel was informed by different stakeholders that the consistency is ensured through different tools, including: templates for the reports and the decisions, the involvement of the coordinator in reading the report and providing feedback to the panels, discussions etc.

## Analysis

The panel confirms that each review process performed by Unibasq is based on frameworks that are reliable, publicized, and pre-defined. Such frameworks demonstrate that the main requirements of professional conduct and transparency are embedded in these methodologies. The evidence collected in the interviews with different stakeholders indicates that the review processes are clear, regarded as useful and implemented consistently in the Basque University System environment.

The panel confirms that the main review processes include the four steps required by the ESG. Those evaluation schemes include self-evaluation, external evaluations by experts, site visits, public reports and follow-up, although not all elements are considered relevant for each individual procedure.

Although the Label procedures do not include site visit, during the interviews the agency's representatives stressed the “factual check” nature of this procedure and indicated that after the certification the compliance against the requirements would be repeatedly checked during the cyclical

external QA procedures (e.g. renewal of study programs' accreditation and Institutional Accreditation).

The review panel, after getting acquainted with all accessible information and after investigating the whole QA framework and keeping in mind that this procedure is voluntary, found that the limited scope of this procedure and the fact that the subject matter of the Labels are included as regular features in the subsequent compulsory review with site visit makes it acceptable that the Labels procedures waive the site visit.

It is important to acknowledge that the CeQuint procedure does not include a specific follow-up step in its framework, which was established as a result of international cooperation in Erasmus + programme. However, during the site visit, the panel was informed that in addition to the established CeQuint framework the agency applies its regular follow-up procedures to observe the progress of the implementation of the recommendations., The panel considers such implementation of CeQuint procedure as consistent and compliant with ESG 2.3 requirements.

The review panel considers the measures to ensure consistency are typical and useful among QA agencies and are suitable to ensure the consistency in a rather small Unibasq environment.

**As far as the 2019 EQAR conclusions are concerned,** the panel has found that the legal framework and its practical implementation demonstrates the sufficient level of follow-up in both compulsory and voluntary external QA activities.

In conclusion, the review panel confirms that Unibasq's QA procedures use the regular components of external quality assurance taking into consideration the justifiable specifics in the design of the Labels and CeQuint frameworks.

#### **Panel conclusion: compliant**

#### ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

**2018 review recommendation:** *“The panel recommends that the agency integrates the values and concepts underpinning the 2015 ESG, with special attention for student-centred learning more explicitly in the training of reviewers and experts.*

*The panel recommends that the agency pursues its efforts to increase the involvement of international experts in the panels.”.*

#### **2019 EQAR conclusion:**

*“In the previous review this standard was flagged due to the fact that the regular involvement of students on all review committees was yet to become practice. The Committee noted that steps have been taken in order to ensure regular involvement of students. Participation of students in evaluation procedures is guaranteed by the Basque Country Act 13/2012. The Register Committee therefore concluded that the flag has been addressed and concurred with the panel's conclusion that Unibasq (substantially) complies with the standard.”*



## Evidence

The peer review approach, involving external experts (incl. student members) performing mandatory review steps in compliance with ESG (including site-visit and other steps) is applied to all newly established or modified procedures, except Labels (Dual and International), where the desk-based evaluation is performed by a specific Evaluation Committee without a panel. Each procedure has a specific panel composition of experts which is described in a very clear manner and published on the Unibasq's website.

The composition of panels is determined in the relevant guidelines and varies slightly according to the specific focus of the procedure. They all include academics and students, while specific expertise in internal quality management and international expertise varies slightly:

**Accreditation renewal of study programmes outside the Basque University System:** The requirements for expert panels are laid down in Article 4.2 of The Procedure for the Accreditation of University Programmes (Bachelor's and Master's level) outside the Basque University System.

**CeQuint Certification:** The composition of the panels is described in Article 3.5 of Frameworks for the Assessment of Quality in Internationalisation.

**Ex-post accreditation of artistic study programmes:** The composition of expert panels is defined in Article 4.2 of the Procedure for Renewal of Accreditation of Official University Bachelor's and Master's Programmes in the Basque University System.

**Institutional Accreditation:** The composition of expert panels is defined in Article 3.2 of the Guide to Standards and Criteria for the Renewal of Institutional Accreditation of University Centres.

The Unibasq Advisory Board approved a Procedure for the selection of experts to collaborate with Unibasq. This document sets the criteria and recruitment procedures, as well as the principles for appointment, monitoring and evaluation of experts.

Every expert must sign, in advance, the declaration of their commitment to respect Unibasq's Code of Ethics and Guarantees and declare that in case of any conflict of interest they will communicate it to the Agency to allow it to take the relevant measures. Before any evaluation procedure takes place, the names of the participating experts are communicated to the institutions; this allows the HEIs to submit any reservations or objections they may have.

The panel observed that Unibasq uses a database to manage its Pool of Experts; a person could submit their application to be included to this database online. Once the application has undergone the internal process of verification within Unibasq, an expert is included on the database, and an e-mail is sent to the applicant. This process, however, is not automatic and after revision of information a person could get a negative response.

During the interviews with different stakeholders the panel explored the aspect of expert training. The agency explained that training activities take place in advance of every evaluation procedure. The methods may vary: these could be face-to-face trainings, online trainings, presentations, recorded materials etc. Experts that were interviewed have expressed their satisfaction with training materials both in regards of its content and form of presentation. Furthermore, they supported the idea that Unibasq is very active and helpful throughout the whole evaluation procedure. Experts highlighted that Unibasq had a very strong guiding role in introducing new procedures, and in explaining the criteria, expectations and expected outcomes to the experts.

Student experts, that are taking part in every panel, confirmed that their role in expert panels is equal both operationally and financially. Experts found the templates of the report and other written methodological materials very helpful and clear.

The review panel was able to scrutinise the expert training materials (e.g., power point presentations, videos on *youtube*). These materials contain information about procedures, criteria, evaluation scales and other evaluation related aspects.

During the interviews the question of international expert involvement was also explored. The agency explained that they intend to involve more international experts, however they had concerns regarding the knowledge of the Basque and Spanish legal requirements.

### **Analysis**

The review panel concluded that the procedures involving external experts generally meet the principles embedded in this standard: the composition, roles and responsibilities of experts are clear and published on the website. The obligation to declare their interests and act in coherence with ethical principles and standards corresponds to common European good practice. The role of the student expert has evolved over time and now is equal to other panel members. The panel has observed that in Unibasq methodologies the representatives of Unibasq are also included in the listings of expert panels. Although the agency explained that these representatives do not participate in decision making and serve as technical assistants, this role is not explicit in legal regulations.

Experts confirmed that the training activities were appropriate, effective and helpful.

The review panel observed that the Label procedure is desk-based and does not involve the peer-review approach. The panel thoroughly investigated the reasoning behind this model. The participants of different interviews stipulated clearly that the nature of this procedure requires the check of factual information without any further interpretations. As the compliance against Label requirements is evaluated in the following cyclical QA procedures, the review panel concluded that the lack of peer review approach in Label procedure does not affect the level of compliance against ESG 2.4.

**As far as the 2018 review recommendation and the 2019 EQAR conclusions are concerned**, the panel confirms that Unibasq has addressed the raised issues appropriately. Student involvement in review panels is compulsory in all procedures with panels, training activities are in place and are appreciated by experts, the involvement of international experts is growing, though very slowly.

In conclusion, the review panel confirms that Unibasq's QA procedures are based on peer review taking into consideration the justifiable specifics in the design of the Labels.

### **Panel conclusion: compliant**

## ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

### **Evidence**

Methodologies and procedures for the evaluation of new ESG-related activities are described in the relevant documents and are fully available on the Unibasq website, which also contains the accreditation reports and decisions of the Evaluation Committees. The documents establish the

specific criteria, furnish institutions with the necessary guidance for the preparation of the self-report, and provide external assessment panels with the necessary tools to carry out their activity. The usefulness, appropriateness and consistency of the documentation were confirmed by HEI representatives and members of the expert panels at the meetings held throughout the on-site visit.

**Accreditation of study programmes outside the Basque University System:** Although specific elements are included to better address the context, the procedure is essentially the same one used in the accreditation (renewal) of Basque study programmes. Unibasq's specific 2018 "Protocol for the accreditation of university degrees (bachelor's and master's level) external to the Basque University System" defines the scope and purpose, all the procedures and the evaluation criteria, and it can be found on the Unibasq website, together with the reports of expert panels, the reports of the Unibasq Evaluation Committee and the final decisions from Unibasq.

**Label (Dual and International):** The 2020 Unibasq "Protocol for obtaining recognition of dual training for official university degrees and master's degrees" and the REACU 2022 "Evaluation Protocol for the inclusion of the Dual Mention, according to RD 822/2021", set out the scope and framework, all procedures and the assessment criteria for the Dual Label, while the procedure for the Internationalization Label is set out in detail in the 2022 "Protocol for obtaining recognition of internationalization for official university bachelor's and master's degrees", which establishes the scope and framework, together with all procedures and assessment criteria.

RD 822/2021 2021 establishing the organization of university education and the procedure for quality assurance (BOE n° 233, of 29 September 2021) provides a general regulation governing dual labels for bachelor's and master's degrees and establishes the general procedure for their award, to be developed by the Spanish QA agencies.

**CeQuint Certification:** The Erasmus+ CeQuint project has developed a methodology for assessing the quality of internationalization in HEIs in order to grant the ECA Certificate of Quality in Internationalization. Unibasq as a member of ECA carries out these assessments.

The procedure follows guidelines laid out in ECA's 2015 "Frameworks for the Assessment of Internationalization" and 2017 "Guide to Assessing the Quality of Internationalization", which set forth the framework for action, the procedures, the evaluation criteria, and the templates to be used, and can be accessed through the Unibasq website.

**Ex-post evaluation of artistic study programmes (Masters):** Initial accreditation (ex-ante accreditation) is carried out in accordance with the general procedure established in REACU's 2022 "Protocol of evaluation for the Verification of syllabuses of university studies leading to the award of official Bachelor's and Master's degrees" and in the 2023 UNIBASQ "Guidelines for the Verification-Authorization, Monitoring, Modification and Accreditation of Official Bachelor's and Master's Degrees". The specific criteria are set by the regulation for this kind of artistic programmes. It consists of a desk-based report drawn up by the Evaluation Committee (following the "Support guide for the assessment of master's degrees in arts education). The report is sent to the HEI for allegations and comments and, once those are reviewed and addressed it is sent as a final report to the corresponding Ministry. UNIBASQ's procedures for follow-up (through its own internal evaluation indicators and the information available, together with the monitoring reports carried out by the HEI three years after implementation or renewal) and for any substantial modification of its study programmes (through a procedure analogous to the ex-ante accreditation) are also established and organized on the basis of REACU's 2022 "Protocol of evaluation for the modification of syllabuses of university studies leading to the award of official Bachelor and Master's degrees".

For renewal of the accreditation of master's degrees, the procedure follows the "Procedure for the renewal of accreditation of official university bachelor's and master's programmes in the Basque University System.

**Institutional Accreditation:** Unibasq developed the 2022 “Guide to standards and criteria for the renewal of Institutional Accreditation of university centres” which is published.

### **Analysis**

The criteria, standards and guidelines for the different procedures are clear not only for self-assessments and external evaluations but also for the adoption of final decisions. The documentation available at Unibasq and the discussions held during the on-site visit convinced the panel that the criteria of the new procedures are applied consistently and ensure evidence-based decision-making. All procedures are based on explicit criteria, and full documentation is published on Unibasq's website, including information on the framework and regulations, documents and guidelines relating to the procedures and evaluation criteria, the composition and functions of the Institutional Accreditation Committee, the Evaluation Committee and the Vectors Committee, and the evaluation reports.

Coherence in the application of the procedure and a consistent interpretation of the criteria are ensured by the Evaluation Committees. Within these committees, consistency is ensured with the help of templates that enable assessments to be homogeneous. Also, while the procedure for the renewal of Institutional Accreditation is still in the pilot phase (and therefore any consistency in the application of the criteria is difficult to assess), the Institutional Accreditation Committee usually includes a member of the expert panel who may take part in the deliberations as an observer. This makes it possible to strengthen coherence between the different evaluation procedures before the Committee and between the procedures and any decisions that it takes. Likewise, consistency between the decisions of the different Evaluation Committees is also ensured through the meetings held by the chairs of the Committees, together with the participation of Unibasq staff to ensure the common understanding different Committees. In addition, members of the expert panel and of Evaluation Committees benefit from training and support in the preparation of reports provided by Unibasq staff.

Based on the provided documents and the impressions gathered during the on-site visit, the panel's view is that the information about the procedures, the evaluation criteria, the Committees' roles, the calls for proposals and the Committees' reports are adequate and all available on the Unibasq website.

In conclusion, the review panel confirms that all criteria and other relevant documents are published and that Unibasq applies appropriate means to support consistent implementation of the criteria.

### **Panel conclusion: compliant**

## ESG 2.6 REPORTING

Standard:

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

### **2018 review recommendation:**

*"UNIBASQ is recommended to further research ways to offer the available information in a more integrated way, making both quantitative and qualitative data easily accessible and comparable for all stakeholders, including students and employers".*

## **2019 EQAR conclusion:**

*“In the last review of the agency the Register Committee flagged for attention the publication of reports for evaluation of study programmes and monitoring reports of study programmes, which then were only communicated to the interested party. The review panel found that Unibasq published all reports, except for the ex-ante accreditation reports on programmes that have not been successful. In its additional representation Unibasq confirmed that it does not publish reports for the from ex-ante accreditation, arguing that it would be confusing for readers to find information on a study programme that will never exist. Unibasq did not express any intention to change this practice in future. The Register Committee underlined that all reports should be published as required by the standard. The Committee underlined that even if a study programme will not be offered it can be of interest for the public to know which concepts were denied accreditation and why. In particular, such information is important if the same programme applies for accreditation by another agency, which needs to be able to find out that it was earlier denied accreditation by another agency. As the flag was largely, but not fully, addressed the Register Committee did not concur with the review panel’s conclusion of compliance, but concluded that Unibasq still complies only partially with ESG 2.6.”*

## **Evidence**

Unibasq systematically publishes documents and reports related to ESG-relevant activities on its website, so that members of the public can easily access the information. This publication is without detriment to the final outcome of the Unibasq report, favourable or unfavourable, and therefore also includes reports that result in a negative decision (in such cases, a disclaimer is added).

The information related to the evaluation of study programmes and Institutional Accreditation is organized under different tabs and every procedure adheres to the same scheme: the legal framework, which contains the applicable regulations at national and regional level; programme documentation for the development of the procedures, which contains the protocols and guides drawn up by Unibasq and, depending on the programme, also by REACU; the functions, composition and appointment resolutions of the Unibasq Committee responsible for the assessment procedure; and the reports drawn up in the assessments, differentiating those corresponding to each HEI, which are published in the language in which they were written (in Spanish or Basque and, occasionally, in English). This section, in turn, differentiates between bachelor's, master's and doctoral study programmes and puts them under three different tabs. In some procedures, the annual call for programme assessment is also published.

The information relating to AUDIT and DOCENTIA is organized according to the specific characteristics of each procedure. AUDIT distinguishes between the following: the certification of the design of the QAS, which includes the documents relating to an HEI’s application and the agreement that it must conclude with Unibasq, as well as a link to the ANECA website that provides information on the tools for design and assessment; the certification for the implementation of the QAS, where the guidelines to develop the procedure can be found, together with model reports; the functions, composition and appointment resolutions of the Evaluation Committee; and the reports resulting from the procedure in the different HEIs. DOCENTIA contains information about the programme documentation, which has links to the ANECA website; the functions, composition and appointment resolutions of the Evaluation Committee; the links to the DOCENTIA programme in each HEI; and the reports resulting from the procedure in the different HEIs.

The information provided both on the Accreditation of Degrees outside the Basque University System and on international accreditation (European Approach and CeQuint) is also in line with the characteristics of the programmes in question. In both cases, therefore, the information is offered under two tabs relating to programme documentation, which contains the protocols and guides drawn up by Unibasq, as well as any HEI reports involved.

According to the Unibasq SAR (p. 29) and the available documentation, "[c]urrently all review reports are published in the specific section of each procedure, but some of them (of study programmes of the Basque University System) are also published in the Observatory of the Basque University System which is being updated". The Observatory's website offers basic information on the Basque University System, the link to the Basque HEIs and their study programmes (credits, mode of delivery, curricula, campuses), together with the ex-ante accreditation, monitoring and renewal reports of their study programmes. In a sense, the Observatory's website functions as a "one-stop shop" where any potential students and interested members of the public can go for information. In addition, Unibasq periodically also uploads the corresponding reports to DEQAR. Since 2019, 299 positive decisions have been published on DEQAR concerning either the European Approach for QA in relation to joint programmes (3, including the decision of the Unibasq Evaluation Committee, which contains a rationale based on the report of the expert panel) or the Accreditation Renewal of study programmes (296 (in Spanish only), however some of the reports, cannot be accessed).

The general rule, which is clear from the Unibasq SAR (p. 29), is that "the structure of the reports follows the guides, templates, protocols, and criteria established in advance. In general, the reports are structured with an introduction (objectives of the report and description and analysis of the activities performed) followed by the main part containing the conclusions, commendations, and recommendations for enhancement". Notably, however, their content sometimes results in very brief and uninformative reports. Also, in some of the procedures, no analytical justification is provided to judge compliance in relation to individual standards, making the reports appear rather formulaic.

At the various meetings that the panel held during the site visit, it was observed that there does not seem to be a homogeneous practice in publishing the reports that result from the evaluation processes, but, on the contrary, there is a varied practice that responds to the nature and characteristics of different procedures.

In this respect, concerning the publication of all reports by Unibasq, a somewhat inconsistent practice can be observed regarding the publication of the reports of the panels of experts. According to what the panel learned from the site visit, Unibasq's practice on the publication of reports in the past has been to publish only its decision with a brief summary accounting for only two or three of the paragraphs of the expert panel's report, which was not published separately. Currently, the report of the expert panel is still not published separately, but its substantive content is at least partly included in the reports of the competent Evaluation Committee. During the site visit, several reasons of not publishing the expert panel reports separately were mentioned: the requirements of Spanish data protection regulations and the intention not to publish two documents that overlap to a large extent.

It was also pointed out to the panel that Unibasq's approach has been to make public what the panel of experts observed during their visit as well as all key findings leading to a positive or negative conclusion, which is already reflected in the competent Committee's report.

Ultimately, the reports published on the Unibasq website are as follows:

*Study programmes:*

-Verification-Authorization (ex-ante accreditation): The evaluation is prepared directly by the Evaluation Committee, whose final report is published. In some cases, the report includes an extensive rationale, while in other cases, only the final decision is published, sometimes together with the Evaluation Committee's recommendations.

-Modification: The evaluation is carried out directly by the Evaluation Committee, whose final report is published. It contains only an assessment of the issues identified in the modification or changes report of the study programme.

-Follow-up: Follow-up is carried out directly by the Evaluation Committee through the Unibasq indicators and the HEI's follow-up reports and any other available information, and only its final report is published.

-Renewal of Accreditation: In this procedure, the panel of experts and the Evaluation Committee intervene consecutively. Only the final report of the Evaluation Committee is published, whereas the separate report of the panel of experts is not. The usual wording in the Evaluation Committee's final report includes a reference to "having analysed the visit report prepared by the visiting panel attached to this report, and all available background information, generating the interim evaluation report" (own translation). Based on the reviewed documentation, however, it appears that the practice is for no more than a portion, if any, of the content of the expert panel's report to be included in the Evaluation Committee's report, which appears to take it into account, but does not attach it separately.

-Labels (Dual & International): The evaluation is carried out directly by the Vectors Committee, whose final report is published with its rationale for the decision in relation to each of the analyzed dimensions.

-Artistic programme studies (Masters): The ex-ante evaluation is carried out directly by the Evaluation Committee, whose final report is published, and it is accompanied in some cases by recommendations. The evaluation procedure for the renewal of accreditation includes a panel of experts who carry out a site visit. However, only the report of the Evaluation Committee is published. These reports state that the Committee "analyzed the visit report drawn up by the visiting panel and all the previous information" (own translation), but no such report is attached separately.

#### *Institutional review:*

-AUDIT: The evaluation is carried out by the Unibasq AUDIT Commission, whose decision and a report with its rationale are published.

-DOCENTIA: The evaluation is carried out by the DOCENTIA Unibasq Commission, whose decision and a report with its rationale are published.

-Institutional Accreditation: In the initial accreditation, only the final report of Unibasq is published (with no indication that it has been prepared by the Institutional Accreditation Committee). It contains only a very brief description of the process and Unibasq's decision. The report of the Unibasq AUDIT Commission regarding the implementation of the quality assurance system at the HEI center are quite complicated to find on the on the agency's website. Also, on the websites of some of these HEI centers, which also apply a diverse practice of publication. To date, these are the only reports to be published because the procedures for Institutional Accreditation renewal are still in the pilot phase and no assessment procedures have yet been finalized.

#### *International programmes:*

-Accreditations of study programmes outside the Basque university system: the report of the panel of experts and the final report of the Evaluation Committee are published.

-European Approach: The decision of the Evaluation Committee is published, stating that it is based on the report of the panel of experts, which is attached in full in the same document.

-CeQuint: The ECA-CeQuint report, which includes all the documents from the procedure including the report of the expert panel, is published.

In addition, Unibasq SAR (p. 29) specifies that "in the case of negative reports on the ex-ante accreditation process prior to the implementation of the study programmes", these negative reports are accompanied by "a note explaining that the study programme will not be taught" in order to avoid any possible confusion on the part of actors interested in accessing them. Moreover, this is an aspect that is addressed in the 2023 "Guide for the Verification-Authorization, Monitoring, Modification and

Accreditation of Official Bachelor's and Master's Degrees", which states that "[i]n accordance with ESG 1.7 on public information, special care must be taken with the information provided to the public with regard to non-verified-authorised degrees and, in particular, with regard to those that are in the assessment phase according to this general procedure".

## **Analysis**

Regarding the publication of negative reports, the panel's view is that Unibasq publishes all review reports, irrespective of their outcome. By attaching the disclaimer to negative ex-ante accreditation reports, UNIBASQ ensures that any members of the public who may potentially access the reports are aware of the situation and can correctly assess what it is. Therefore, Unibasq has responded to the objections raised by the EQAR Registration Committee in 2019.

However, the panel's view is different in relation to the publication reports produced by expert panels in procedures involving site visits to HEIs. This is the situation as it relates to the procedures for renewal of the accreditation of study programmes, renewal of the accreditation of artistic study programmes (masters) and renewal of Institutional Accreditation (which were not available at the time of the targeted review as the procedure was still on-going), where the panel of experts is involved and draws up a report. However, these reports are not published separately.

In accordance with the procedure, the competent Committee analyses the report of the panel of experts and adopts an interim report, which is forwarded to the HEI to identify any factual or non-factual allegations and comments. If any are raised, the competent committee reviews and addresses them and adopts its final report, which is jointly prepared and approved by consensus of the Committee members. The final report is sent to Unibasq technical staff for final review and then sent to the HEI and published on the agency's website. In the case of the renewal of Institutional Accreditation, a recently introduced approach allows for the participation of a member of the panel of experts in the Committee's discussions.

In practice, reports from the site visits of expert panels are only available for analysis by the Unibasq Committees. The preliminary and final review reports are prepared by the competent committees on the basis of the reports submitted by expert panels, but the full content of such reports is not made publicly available. Therefore, there is no way of knowing the extent to which the competent committee reproduces the key findings of the expert panel as a result of its site visit. The non-publication of reports submitted by panels of experts makes it impossible to distinguish their specific assessment of issues from the judgement of the Unibasq Committees, since any modification made by the latter has been integrated into the text without any mention of a possible different position held by the former. In some cases, the modifications may affect nothing more than stylistic drafting aspects, while in other cases they may affect substantial issues. In either case, however, it is impossible to tell from the final published report and, therefore, it will not be clear to interested members of the public.

Notwithstanding, the discussions held during the site visit, particularly the meeting with Unibasq staff members and the members of the experts' panels, suggest that the two reports are generally well aligned and there seems to be no discord between the position of the competent committee and the position of the expert panel, nor between the members of the each of the two bodies. However, the panel has also noted from the same meetings that, in the event that the competent committee makes any changes, whether minor or major, the members of the panel of experts are not made aware of them (with the exception of the renewal of Institutional Accreditation, where a member of the panel of experts may be present at the Committee's discussions). Nor are the HEIs themselves, who receive the interim report of the competent Committee, made aware of such modifications, since, as indicated in one of the meetings during the site visit, they first receive a "modulated version of the report of the panel of experts", to which they can submit allegations and comments, and then, once those have been



reviewed and addressed by the competent Committee, they receive a shorter version of the report, integrating the competent Committee's responses.

Therefore, no interested members of the public can know with certainty whether the HEIs have submitted factual and non-factual allegations and comments in response to the report of the panel of experts (they do not) or before the competent Committee, nor can they learn the outcome of any allegations and comments, thereby hindering the clarity and transparency of decision-making processes. On the one hand, the report sent to the HEIs for possible comments is the interim report adopted by the competent Committee and not the initial report of the panel of experts, which is only sent to the committee. On the other hand, there also seems to be a diverse practice in accounting for such allegations and comments. For instance, some final reports of the Evaluation Committee take note of the existence of any allegations and comments from the HEI and any responses from the Committee, while others only refer to the existence of such allegations and comments (without differentiating whether they point out factual errors or raise substantive issues or disagreements), or they simply do not mention them at all. In other words, it is not possible in most cases for members of the public to know whether and how any HEI allegations and comments have actually been raised and substantiated, or to learn the extent to which the process resulted in any deviation from the initial report of the panel of experts or the interim report of the Evaluation Committee.

To a certain extent, it can be considered that, if the report of the panel of experts and the report of the competent Committee are identical in form and content and no factual errors are found and no allegations or comments are submitted by the HEI, the meaning of ESG 2.6 would not be altered for practical purposes, since the competent Committee's report reproduces verbatim the content of the report submitted by the panel of experts. However, in any other situation where changes have occurred as a result of a different assessment by the competent Committee, full compliance with ESG 2.6 cannot be ensured. Unibasq should review this practice to be in line with the standard and ensure that the published reports at least include all "important" information.

**As far as the 2018 review recommendation and the 2019 EQAR conclusions are concerned**, the panel confirms the statements made by Unibasq in the relevant communication with EQAR after the last review and in the Follow-up report that was submitted to ENQA in 2021:

In its 2021 monitoring report, UNIBASQ confirmed the accessibility of review reports for all stakeholders, not only on its own website but also through the Observatory that monitors the activity of the Basque University System (<https://observatorio.unibasq.eus/es/>). Furthermore, in December 2022, EQAR received the Substantive Change Report of UNIBASQ on the renewal procedure for Institutional Accreditation. In its decision of April 2023, the EQAR Register Committee noted in relation to the procedure that "the regulations describe the several stages passed by a review report but leave open at which stage(s) exactly it is published (ESG 2.6)". Likewise, on March 2023, UNIBASQ communicated to EQAR a new Substantial Change corresponding to the following procedures: Labels (Dual and International), CeQuint certification, ex-post evaluation of Master programmes in the Arts, and Accreditation renewal of study programmes outside the Basque University System, in respect of which the EQAR Register Committee did not raise any specific questions about compliance with ESG 2.6.

On the one side, regarding the publication of negative reports, the panel's view is that Unibasq publishes all review reports, irrespective of their outcome. By attaching the disclaimer to negative ex-ante accreditation reports, Unibasq ensures that any members of the public who may potentially access the reports are aware of the situation and can correctly assess what it is. Therefore, Unibasq has responded to the objections raised by the EQAR Registration Committee in 2019.

On the other side, the publication of the expert panel's reports, insofar as the full publication of and access to these reports, is not guaranteed and full compliance with ESG 2.6 cannot be ensured.

In conclusion, the panel is of the opinion that Unibasq does not fully comply with this standard because of lack of transparency regarding the publication of the panel reports.

#### **Panel recommendation 1**

The panel recommends that Unibasq publishes in full the report of the panel of experts, which should stand as a separate document.

#### **Panel recommendation 2**

The panel recommends Unibasq to identify transparently in the competent committees' reports any deviations from the assessment of the panel of experts and to indicate the reasons that have led it to diverge from the position of the panel of experts and its assessment in this respect.

#### **Panel recommendation 3**

The panel recommends that Unibasq publishes the final report of the competent committee under the rubric of a "decision" instead of a "report".

#### **Panel suggestion for further improvement 2**

The panel recommends that Unibasq publishes any allegations and comments submitted by the HEIs in response to the panel of expert's report or to the interim report of the competent committee, as well as any resulting outcome.

#### **Panel conclusion: partially compliant**

### **ESG 2.7 COMPLAINTS AND APPEALS**

Standard:

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

#### **2018 review recommendation:**

*"Unibasq is recommended to split the Ethics and Guarantees Committee and make sure the Appeals Committee is composed of members who are independent from the agency and the Basque higher education system."*

#### **2019 EQAR conclusions:**

*"In order to improve the appeals procedure, the former Ethics Committee became the Ethics and Guarantees Committee, which was composed of members who play an active role within the agency. The review panel noted that the composition of the Committee was limiting its independence. The Register Committee underlined the recommendation of the panel that the Ethics and Guarantees Committee be composed of members who are independent from the agency and the Basque higher education system. In its additional representation, Unibasq stated that the composition of the Committee had been changed. The new Ethics and Guarantees Code, which was approved by Unibasq's Governing Council, established that the Committee is now composed of experts from outside the Basque University System, who moreover cannot be part of any other Unibasq body or committee. The Register Committee was able to see the new composition on Unibasq's website. Furthermore, while the panel confirmed that Unibasq has developed a clear appeals process, it referred to "a more general procedure for the reception and handling of complaints and suggestion", but did not analyse that in detail. In its additional representation, Unibasq did not comment further on the complaints procedure. Given*

*the unclear process for handling complaints, the Register Committee remained unable to concur with the review panel's conclusion of compliance but concluded that Unibasq complies only partially with ESG 2.7."*

## **Evidence**

Unibasq has a procedure for appeals and complaints (Suggestions, Complaints and Claims). However, this document cannot be found on Unibasq website, which only refers to "Complaints and suggestions" regarding the services provided by the agency and then links to a single online document in which the user must indicate a choice between "complaint", "suggestion" or "information". Unibasq's governance includes the Ethics and Guarantees Committee with the responsibility "to ensure and guarantee that each and every one of the actions carried out within Unibasq are transparent and respect the provisions of the Code of Ethics" (Art 1, Regulations of the Ethics and Guarantees Committee) which includes appeals and complaints. The committee is composed of "three people from outside the Basque University System and from all the Agency's governing and/or evaluation bodies. One of them will be elected by the Governing Board, another by the Advisory Board and the third by the Unibasq Student Advisory Committee." (Art. 3, Regulations of the Ethics and Guarantees Committee) The procedure is governed by the Code of Ethics and Guarantees and by the Regulations of the Ethics and Guarantees Committee. According to Art 12 4) and 5) of the code the Ethics and Guarantees Committee has "To decide on appeals against certification and accreditation decisions, or evaluation reports issued by Unibasq that are based on a formal defect that damages any guarantees established in favour of the person or institution evaluated, or in the lack of impartiality of any person who has intervened in the process. 5) To report on the claims submitted for breach of the Code that are based on any other reason than the one specified in the previous paragraph."

The same clause determines the consequence of committee decisions: "If the resolution considers the appeal, the consequence will be the declaration of nullity of the decision and the repetition of the appealed certification, accreditation or evaluation report."

Art 6 of the regulations stipulates the reasons for appeal, and the procedural steps. Further to this Art 10 and 11 emphasize impartiality as reason for complaint/appeal and that the committee immediately removes the person in question from the panel.

Art 2 no. 2 and 3 of the regulations stipulate the consequences of the decisions of the Committee in case of complaints: "2. When the basis of the requirement is based on the contravention of other precepts of the Code of Ethics and Guarantees, the Committee's actions will end with the issuance of a non-binding report before the corresponding body or person following the procedure established in article 7. of this Regulation. 3. When the basis of the requirement is based on the contravention of other precepts of the Code of Ethics and Guarantees, the Committee's actions will end with the issuance of a non-binding report before the corresponding body or person following the procedure established in article 7. of this Regulation."

However, it is rather confusing since, besides dealing jointly with cases that are the subject of appeal and cases that are the subject of complaint, it refers, on some occasions, only to "communications" (in generic terms), while on other occasions it refers indistinctly to "communications, applications or appeals. It is clear from the text, however, that this "communication" will be treated as an appeal when it concerns "certification, accreditation or evaluation decisions issued by Unibasq".

On the other hand, Article 7 is applicable in case of complaints ("reclamaciones") about the infringement of the Code of Ethics and Safeguards other than those listed in the previous provision. Unlike the previous case, the outcome of the procedure is "a non-binding report making recommendations to the persons and bodies of Unibasq mentioned in the procedure".

Appeals have to be submitted by post or by Email to a dedicated Email address of the Ethics and Guarantees, the Committee ([comite\\_etica@unibasq.eus](mailto:comite_etica@unibasq.eus)); complaints can be filed either through the

same Email address or through an online form on the agency's website that includes separate sections for comments, suggestions and complaints. The procedure foresees an annual report about complaints.

The procedure is explained in the regulations or guidelines for the various procedures in different ways. The Unibasq "Protocol for the accreditation of university degrees (bachelor's and master's level) external to the Basque University System" for the Accreditation renewal of study programmes outside the Basque University System presents the procedure verbatim. As for the Dual & International Labels, the 2022 "Protocol for obtaining recognition of internationalisation for official university Bachelor's and Master's degrees" does not refer to the appeals and complaints procedure. They only refer to the stage at which the HEI can submit allegations to the Committees after receipt of the preliminary report and before it prepares its final report. Concerning the CeQuint Certification, this is an area not specifically covered in CeQuint's procedure guidelines, but the project's website (<https://cequint.eu/getting-certified/>) mentions that "the decision regarding CeQuint is taken by the ECA member agency" and that "the applicant will have to lodge an appeal to the decision with the agency, following the appeals procedure of the agency. If the decision is taken by the ECA Certification Group then the applicant will have to lodge an appeal to ECA". In the latter case, the appeals procedure is as set out in the ECA documentation.

For those new ESG related-activities in which the final decision is taken by the Council of Universities (Institutional Accreditation) or the corresponding Ministry (ex-post evaluation of artistic study programmes), the SAR (p. 32) provides little information as it mainly refers, again, to the stage at which the HEI submits allegations after receipt of the preliminary report from the Evaluation Committee and before the final report is prepared. Whereas complaints are supposed to be handled in the same way as above, according to the SAR (p. 31) and on what the panel learned during the on-site visit, there is no possibility of appeal to Unibasq, and the HEI must lodge an appeal directly before the Council of Universities. In the event of an unfavourable outcome, HEIs can litigate before the Spanish courts against the Council of Universities or the corresponding Ministry. Therefore, and in accordance with Article 26 of the RD 822/2021, the general procedure for appeals is as follows: The Council of Universities notifies the HEI and the agency of its decision. The HEI may request its review within ten days before the Council of Universities. If it deems it necessary, the Council of Universities may send the file to the agency that issued the report for an additional evaluation. The whole procedure, depending on whether or not a new action is sought from the agency, can take between one and three months. It ends the administrative path, so that only an appeal for reversal ("recurso de reposición") is possible, and the resolution may be challenged before the national courts (contentious-administrative jurisdiction).

During the site visit representatives from universities informed the review panel that they were aware of the formal process but that they don't use it for complaints but prefer direct communication with the agency which has proven effective and efficient to resolve any unclarities or complaints which are rare anyway. At the time of the site visit no appeals or formal complaints had been received which was also confirmed by members of the Ethics and Guarantees Committee.

The Panel heard that Unibasq is discussing the possibility of splitting the Ethics and Guarantees Committee into two separate bodies.

## **Analysis**

The procedure for appeal and complaints and the responsible Ethics and Guarantees Committee are regulated by bylaws. The regulations of the Ethics and Guarantees Committee and the Code of Ethics are transparent and provide HEIs with an appropriate procedure for appeals and complaints.

In this context a specific feature of the appeal procedure should be mentioned: the timing follows a regular pattern that applies to all procedures and includes the following steps:

1. The report is notified to the institution.
2. A period of usually 20 days is available for the institution to submit any claims or appeals, or to comment of factual errors.
3. The corresponding competent committee (e.g. Evaluation Committee, Vector Committee, etc.) reviews the draft report taking into consideration any observation made by the HEI and a final evaluation report is produced.

In case of an appeal however, the case will be processed by the Ethics and Guarantees Committee.

The specific feature is the parallelism of the appeal or complaint with the regular process of requesting correction of factual errors. Although this is not a problem as such and the procedures are regulated transparently, the panel believes that a separation of the request for correction of factual errors from appeals and complaints in the guidelines of the various procedures might support transparency. Such a separation would have also been beneficial for the presentation of the procedure in the SAR which seems unnecessarily complicated.

The panel was informed, through the SAR and at meetings at the site visit, that Unibasq is working on the revision of its Code of Ethics and Guarantees, currently under review by the Advisory Board and the Ethics and Guarantees Committee. This would be a good opportunity to review also the aspects related to the complaints procedure.

**As far as the 2018 review recommendation and the 2019 EQAR conclusions are concerned** the panel confirms the statements made by Unibasq in the relevant communication with EQAR after the last review and in the Follow-up report that was submitted to ENQA in 2021. The Ethics and Guarantees Committee is now composed of members from outside the Basque higher education system which enhances its independence; based on nil appeals and complaints the panel understands why Unibasq hesitated in splitting the committee into two. Based on its own findings the panel considers the second aspect of EQAR's comment to be a question of presentation of the appeals and complaints procedure to EQAR which seemed to have caused the same confusion as the SAR did. However, as explained in the previous paragraph, the regulations are clear, and a revision of the presentation to externals will support clarity. This leads to the panel's conclusion that these recommendations and concerns were addressed adequately.

In conclusion, the panel states that the procedure of appeals and complaints is in-line with the ESG.

### **Panel suggestion for further improvement 3**

The panel encourages Unibasq to adapt the general communication about and presentation of appeals and complaints in the guidelines for the various procedures by separating it from the request for correction of factual errors in review reports.

**Panel conclusion: compliant.**

# ENHANCEMENT AREA

## ESG 3.4 THEMATIC ANALYSIS

After the 2014 evaluation of Unibasq, EQAR emphasized the need to improve the agency's approach to thematic analysis (ESG 3.4) and to dedicate more resources to this activity. In 2019, while conceding that the thematic analysis had been carried out, it insisted that Unibasq should ensure sufficient resources to carry out this activity in a more sustainable manner. The 2019 review recommendation included the structural integration of the publication of thematic analyses into the agency's strategy and daily work.

For its 2023 targeted review Unibasq chose Thematic Analysis as its Enhancement Theme. In the SAR, the agency summarizes briefly current deliberations about future directions in this area and highlights among others, aims such as involving the universities in working groups to conduct thematic analyses, creating a space for co-creation and mutual learning among universities, and presenting good practice. The deliberations have a strong focus on methodologies for conducting thematic analyses. The agency wished to receive input from the 2023 panel for their discussions around three explicit questions and topics:

- “ ■ if the external experts should be part of the working group or they could participate in peer-learning activities joint or at each of the universities;
- if the universities should provide case studies or good practices, if there are any;
- the way to select topics and if a previous desk-based research would be useful.”

The review panel did a desk-based analysis of the material submitted by the agency and held an additional meeting before the site visit to discuss thematic analysis in general and the specifics of Unibasq and explored provisionally directions of future developments. During the site visit the panel addressed the topic in almost all meetings and particularly in a meeting with Unibasq management and staff that was dedicated to thematic analyses exclusively. The analysis of the current activities in the field of thematic analysis reveals the following findings:

In recent years, Unibasq has only been involved in a few thematic analyses developed in the framework of ENQA (one) and in international projects (three). In addition, Unibasq has participated in a REACU working group on thematic analysis, which has organised webinars and which has analysed and published an analysis on degree re-evaluation processes. The few Unibasq publications that are available on the website date from 2017-2018 or earlier (Meta-evaluation of programmes) consist of data collection without qualitative analysis carried out by other entities (Sociological Prospecting Office of the Basque Government and other); or are articles published in journals about general reflections. In any case, this activity shows a certain reliance on international/external initiatives, on the other hand such analyses do not seem to occur on a regular, systematic, and sustained basis over time. Between 2018 and 2022, Unibasq shifted its focus towards other activities due to factors like the development of new quality assurance procedures and the impact of COVID-19. Thematic analysis, which demands time, and human resources, took a backseat during this period.

The improvement of thematic analysis is included in the 2020-2023 Strategy and in the draft of the 2024-2027 Strategy. The 2020-2023 Strategy does not provide much information on this objective. The development of thematic analyses is included in the strategic objective "Innovation in evaluation, advisory and foresight services for SUVs", and in the action line "Promoting new advisory and foresight services that add value to SUVs". The achievement of this objective is assessed only quantitatively, as the only indicator is the "No. of new advisory services and foresight/thematic analyses".

With regards to the 2024-2027 Strategy, although there is only limited specific information, the SAR underscores thematic analysis as a significant priority and outlines potential future directions. These

encompass identifying relevant topics (with a prerequisite definition of the methodology), establishing a working group (pending clarification of its composition and mandate), and compiling best practices from universities (pending clarification of the methodology and scope). Unibasq acknowledged, not much progress has been made since that last review and emphasized its eagerness to strengthen its activities substantially.

Based on the desk-based analysis and the various meetings during the site visit the review panel wants to emphasize certain framework conditions of Unibasq to be taken into consideration in the development of future plans:

- Unibasq is the only recognized quality assurance agency in the Basque higher education system.
- Through its broad remit of reviews at programme and institutional levels, the Docentia programme and its various evaluations in the area of research, it collects a wide range of information about institutions and their activities; this is complemented by Unibasq's involvement in the Observatory of the Basque University System.
- Close collaboration with stakeholders who perceive Unibasq as an important agent to develop the higher education system in general, not limited to reviews of programmes and institutions, and who explicitly support the agency's intention to strengthen thematic analysis, is a particularly strong feature of the agency.
- The size of the higher education system with only four institutions reduces necessary resources and makes collaborative approaches together with the sector and stakeholders easy. Furthermore, Unibasq is a relatively small organisation which makes it easy to maintain the overview about collected information and data; it is acknowledged at the same time that allocation of staff resources is key.
- The network REACU and existing collaborations regarding thematic analyses can add a comparative perspective which might be relevant or even sought for by institutions and stakeholders.
- The Basque University System Activity Observatory – Unibasq Behatokia is a unique source of data that complements information collected from reviews.

The panel offers the opinion that these framework conditions create a favourable basis for Unibasq to contribute to the development of the Basque University System through comprehensive thematic analyses.

The discussions during the site visit confirmed the review panel's impression that Unibasq is looking for a certain appropriate or good practice to conduct thematic analyses. In particular, the three questions posed to the review panel seem to be based on the understanding that there is an agreement on a preferred type of thematic analysis or preferred methodologies.

The review panel wishes to emphasize that there is no blueprint for thematic analysis, and that purpose, topics and methodologies can vary greatly. Furthermore, the concept of thematic analysis has evolved over the years.

The decisions in agency reviews taken by ENQA demonstrate that the concept of thematic analysis has widened over the years. Although ESG 3.4 is quite clear ("Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.") and requires analyses based on review reports, some agencies -often based on a remit that goes beyond conducting reviews- have always applied a broader approach that included analytical or research work with other information or data bases than review reports. An ENQA report of 2020 presents three types of analytical reports that were considered thematic analyses namely:

- "The systematic use of quality assurance reports for analysis;
- thematic reports on specific topics;

- additional gathering of information (via internal or external projects and possibly involving other parties such as other national institutions or bodies).”<sup>6</sup>

It is worth noting that only the first one refers to the former narrow understanding of thematic analysis. The wider concept of thematic analysis takes account of the fact that the roles of external quality assurance and external quality assurance agencies have been evolving, as have the methodologies. Many agencies have broader remits than conducting compulsory external reviews of the provision of higher education which broadens the basis of information and data collected and generated by the agencies. Furthermore, as far as the enhancement dimension of external quality assurance is concerned, activities such as thematic analyses might also contribute to enhancement through presentation of relevant information, good practice or opportunities to benchmark activities.<sup>7</sup>

As a consequence, and based on the previously mentioned favourable framework conditions, Unibasq might also wish to apply a wider concept of thematic analysis as one component of a wider concept to contribute to the development of the whole higher education sector.

The discussions during the site visit revealed an abundance of topics proposed by Unibasq itself and also by all stakeholders which, indeed, were not limited to topics directly linked to review activities. One topic that stood out is the current development from a control-oriented and largely quantitative approach to external quality assurance to a more qualitative approach that should strengthen the enhancement function of external quality assurance and the prime responsibility of universities for quality and quality assurance. Discussions about the challenges in pursuing this direction and the impact on universities that go beyond methodological questions of the review but affect internal cultures of the institutions demonstrated that all parties involved acknowledge the need to further analyse these challenges and suitable solutions.

Notwithstanding the plea for a wider approach, it is to be emphasized that Unibasq should pursue also analysis of the information collected through reviews -hence the traditional approach to thematic analysis-, for three reasons:

- Review reports are a unique source of independent information about institutions’ activities.
- Review reports might be a relevant source for identifying relevant topics or issues to be analysed at a system-level.
- Review reports are an important source of information about the agency’s own procedures namely the relevance, clarity and applicability of standards, criteria and review methodologies.

Regarding methodology this means that, depending on the topic a variety of methods should be used as appropriate: Analysis of data and/or documents, surveys, presentation of case studies, etc. One approach which is to be emphasized is the use of various sources such as statistical data namely the Basque University System Activity Observatory – Unibasq Behatokia, qualitative information from review reports or university material, etc to address a research question.

Also, the aspect of stakeholder involvement is to be emphasized. Starting from the aim to pursue thematic analyses that support the higher education system and the individual universities it seems straightforward to involve stakeholders. This goes without saying for the selection of topics that are

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<sup>6</sup> ESG 2015–2018 ENQA Agency Reports: Thematic Analysis (Occasional Paper 28) ([ESG-2015-ENQA-Thematic-Analysis-final.pdf](#)), p. 7.

<sup>7</sup> Achim Hopbach/Anne Flierman, Higher Education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), in: [Advancing quality in European higher education: celebrating 20 years of ENQA](#), ed. By ENQA; Brussels ([Advancing-quality-in-European-higher-education-celebrating-20-years-of-ENQA.pdf](#)), p. 35.



relevant for stakeholders. It goes even further because, depending on the topic it might make sense or at least be cost effective to involve stakeholders in the conduct of the analysis by utilizing their expertise. Especially in case of thematic analyses that use more or other sources than the review reports, it might even be obvious or even necessary to collaborate with stakeholders. The positive feedback by stakeholders that the panel heard during the site visit regarding the relevance of thematic analyses and the willingness to collaborate create an opportunity not to be missed.

The collaborative approach suits especially such thematic analyses that go beyond analysis and include recommendations or identification/presentation of good practice. This type of thematic analysis has huge potential for joint and mutual learning of universities and stakeholders. In addition, this complements the role of Unibasq vis-à-vis the universities and stakeholders by establishing itself as a centre of expertise.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

1. The panel commends Unibasq for the close collaboration with and involvement of its stakeholders.
2. The panel commends Unibasq for its efforts regarding opening access and publishing data on study programmes within the Basque Country on a custom-made website called Observatory of the Basque University System.
3. The panel commends Unibasq for a very active and fruitful involvement of stakeholders in shaping methodologies.
4. The panel commends Unibasq for the revised Institutional Accreditation that has initiated real impact to HEIs and their internal QA systems.
5. The panel commends Unibasq for being instrumental in shaping and developing Label procedures, that demonstrate the synergies between HEIs and labour market.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

1. The panel recommends that Unibasq publishes in full the report of the panel of experts, which should stand as a separate document.
2. The panel recommends Unibasq to identify transparently in the competent committees' reports any deviations from the assessment of the panel of experts and to indicate the reasons that have led it to diverge from the position of the panel of experts and its assessment in this respect.
3. The panel recommends Unibasq to publish the final report of the competent committee under the rubric of a "decision" instead of a "report".

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

## SUGGESTIONS FOR FURTHER IMPROVEMENT

1. The panel encourages Unibasq to strengthen formal involvement of stakeholders beyond academics in its governance bodies namely in the Advisory Board.
2. The panel recommends that Unibasq publishes any allegations and comments submitted by the HEIs in response to the panel of expert's report or to the interim report of the competent committee, as well as any resulting outcome.
3. The panel encourages Unibasq to adapting the general communication about and presentation of appeals and complaints in the guidelines for the various procedures by separating it from the request for correction of factual errors in review reports.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
08.08.2023 – <b>Online</b> meeting with agency’s resource person			
	13:00-14:50 CET	Review panel’s kick-off meeting and preparations for site visit	
	15:00-16:00 CET	An <b>online</b> clarification meeting with the agency’s resource person to clarify the agency’s changes since the last full review against the ESG and to understand the background and motive of the agency’s choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	Unibasq resource person
Monday, 02.10.2023– Day 0 (pre-visit)			
1	17:00-18:00 (here and further on – local time)	Review panel’s pre-visit meeting and preparations for day 1 – Unibasq	
2	18:15-19:00	A pre-visit meeting with the agency’s resource person to clarify any remaining questions after the online clarifications meeting	Unibasq resource person
		Diner (panel only)	
Tuesday, 03.10.2023 – Day 1			
	9:00-9:30	Review panel’s private meeting	
3	9:30-10:15	Meeting with the CEO and the Representative of the Governing Board	CEO of Unibasq Representative of the Governing Board

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	15 min	Review panel's private meeting	
4	10:30 - 11:30	Meeting with the Agency's representatives involved in study programmes and institutional reviews	Staff members of Unibasq
	30 min	Review panel's private meeting	
5	12:00 (12:05) - 12:45	Meeting with the representatives of Advisory Board	Members of the Advisory Board
	12:45-13:45	Lunch (panel only)	
6	13:45 - 14:30	Meeting with the representatives of different Evaluation Committees	Members of the Evaluation Committees: Institutional accreditation – QA professional-UNIR Study programmes – Architecture and Engineering – chair – Universidad de Cantabria Social Sciences and Law – academic- Universidad Pública de Navarra Vectors/Labels – PhD student – online
	15 min	Review panel's private meeting	
8	14:45 – 15:30	Meeting with the representatives of Ethics and Guarantees Committee (online)	Members of Ethics and Guarantees Committee
	15 min	Review panel's private meeting	
9	15:45 – 16:30	Meeting with the Agency's staff on the agency's self-selected enhancement area	CEO of Unibasq Unibasq resource person

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
10	16:30 – 17:30	Wrap-up meeting among panel members and preparations for day 2	
		Dinner (panel only)	
Wednesday, 04.10.2023 – Day 2			
	9:00 – 9:45	Review panel's private meeting	
11	9:45 -10:30	Meeting with representatives of the Basque Government's Education Department	Universities Director of the Basque Government
	15 min	Review panel's private meeting	
12	10:45 -11:30	Meeting with the representatives of the Student Consultative Committee (online)	Member of Study programmes Committee
	15 min	Review panel's private meeting	
13	11:45 -12:30	Meeting with representatives from the reviewers' pool (online)	Representatives that have participated in different types of evaluations:  CeQuint, DOCENTIA  University of Algarve, Portugal-European Approach  PhD student member of the Study Programmes evaluation committee of the Science Area and member of several panels and European Approach  PhD student – Institutional accreditation panel
	12:30 – 13:30	Lunch (panel only)	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
14	13:30 – 14:15	Meeting with stakeholders (employers, students, local community)	Member of Students Council, UPV/EHU Director of Euskalit Representative of Confebask – Basque Business Confederation
	15 min	Review panel's private meeting	
15	14:30 – 15:15	Meeting with the representatives of local HEIs (including quality assurance officers of HEIs)	Vice rector, Mondragon Unibertsitatea Vice rector, UPV/EHU
	45 min	Review panel's private meeting	
16	16:00-16:20	Meeting with the representatives of foreign HEIs (online)	Former rector of the Universidad de Aconcagua-Chile Vice rector CEU-San Pablo
17	16:30 – 17:00	Session to further investigate additional topics that may arise during the site visit regarding agency's compliance with the ESG	Unibasq resource person
18	17:00 – 17:30	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
Thursday, 05.10.2023 – Day 3			
19	9:00 – 10:00	Meeting among panel members to agree on final issues to clarify	
20	10:00 – 11:00	Meeting with CEO/resource person to clarify any pending issues	CEO of Unibasq Unibasq resource person

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
21	11:00 – 12:30	Private meeting between panel members to agree on the main findings	
	12:30 – 13:30	Lunch (panel only)	
22	13:30 – 14:00	Final de-briefing meeting with staff and Board members (tbc – online) of the agency to inform about preliminary findings	

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

# Targeted review of Agency for Quality of the Basque University System (Unibasq) against the ESG

# Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between Unibasq (applicant), ENQA (coordinator) and EQAR.

## 1. Background

The Agency for Quality of the Basque University System (Unibasq) has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 01/04/2014 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Agency for Quality of the Basque University System-Unibasq has been a member of the ENQA since 2014 and is applying for renewal of ENQA membership.

Unibasq is carrying out the following activities within the scope of the ESG:

Programme level

- *Programme ex-ante accreditation and authorisation in the Basque University System*
- *Review of study programme modifications*
- *Accreditation renewal of study programmes*
  - *in the Basque University System*
  - *outside the Basque University System<sup>8</sup>*
  - *of joint study programmes*
- *Follow-up of study programmes in the Basque University System*
- *Labels<sup>8</sup>*
  - *Dual*
  - *International*
- *CeQulnt Certification<sup>8</sup>*

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<sup>8</sup> See [decision of 17/04/2023 on Unibasq's Substantive Change Report of 15/03/2023](#)



- *Ex-ante evaluation of master programmes in the arts*
- *Ex-post evaluation of artistic study programmes<sup>8</sup>*
- *European Approach for QA of Joint Programmes*

#### Institutional

- *Institutional Accreditation<sup>9</sup>*
- *AUDIT (Audits of internal quality assurance systems of faculties, shared programme with ANECA, AQU and ACSUG)*
- *DOCENTIA*

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

The following activities of the applicant are outside the scope of the ESG:

- *Evaluation of research teams*
- *Evaluation of research activities*
- *Review of applications for grants by research groups<sup>9</sup>*
- *Evaluation of university research institutes<sup>8</sup>*
- *Technical reports on institutional agreements<sup>8</sup>*
- *Evaluation of academic staff*
- *Reports for non-accredited study programmes (UPV/EHU) - Títulos propios*

While these activities are not relevant to the application for renewal on EQAR, the clear distinction between Unibasq activities within and outside the scope of the ESG is one focus area of this review (see below re. ESG 3.1).

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

This review will evaluate the extent to which Unibasq continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support Unibasq's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

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<sup>9</sup> See [decision of 17/04/2023 on Unibasq's Substantive Change Report of 01/12/2022](#)

## 2.1 Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision<sup>10</sup>:

**ESG 2.6:** considering the publication of all and full reports **in all activities**, in particular negative ex-ante accreditation reports as well as from Unibasq's new activities;

**ESG 2.7:** reviewing the composition and independence of Unibasq's appeals committee as well as Unibasq processes and procedure for handling complaints;

**ESG 3.1:** addressing how Unibasq ensures a clear distinction and presentation of its quality assurance activities outside the scope of the ESG in particular considering the activity *Titulos propios*, as well as the new activities outside the scope of the ESG;

B) Standards 2.1 to 2.7 for the following new/changed activities:

a. *Accreditation renewal of study programmes outside the Basque University System* (new)

b. *Labels* (new)

i. *Dual*

ii. *International*

c. *CeQulnt Certification* (new)

d. *Ex-post evaluation of artistic study programmes* (new)

e. *Institutional accreditation*, covering those areas where changes were made and at least the following in detail:

ESG 2.2: how the agency ensures that the revised methodology is fit for purpose and how were stakeholders involved in the development of the processes and criteria;

ESG 2.4: training of the review panels for this activity;

ESG 2.6: details about the stage when reports are published;

C) *(not applicable)*

D) **ESG 2.1** Consideration of internal quality assurance (**in all activities**);

E) Selected enhancement area: **ESG 3.4** Thematic analysis

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

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<sup>10</sup> See [https://backend.deqar.eu/reports/EQAR/2019-11-A65\\_Application\\_Decision\\_Unibasq.pdf](https://backend.deqar.eu/reports/EQAR/2019-11-A65_Application_Decision_Unibasq.pdf)

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

### **3. The review process**

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, Unibasq and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by Unibasq including the preparation and publication of a self-assessment report;
- A site visit by the review panel to Unibasq;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

#### **3.1 Independence of the review coordinator**

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to Unibasq during the past 5 years, and conversely Unibasq has not provided any remunerated or unremunerated services to the coordinator.

#### **3.2 Nomination and appointment of the review team members**

The review panel consists of at four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. 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. At least two panel members come from outside the national system of the agency under review (if relevant).

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

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

Once appointed, the coordinator will inform EQAR about the appointed panel members.

### **3.3 Self-assessment by Unibasq, including the preparation of a self-assessment report**

Unibasq is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);
- a SWOT analysis of the agency as a whole;

- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which Unibasq fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

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

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

### **3.4 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to Unibasq at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

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.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

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

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

### **3.5 Preparation and completion of the final review report**

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should 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.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If Unibasq 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 Unibasq and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel will sign off on the final version of the external review report. The coordinator will provide to Unibasq the [Declaration of Honour](#) together with the final report.

## **4. Publication and use of the report**

Unibasq will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

## 5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in June 2024. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

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

## 6. Indicative schedule of the review

Agreement on Terms of Reference	May 2023
Appointment of review panel members	May 2023
Self-assessment report (SAR) completed by Unibasq	12 <sup>th</sup> June 2023
Screening of SAR by ENQA Review Coordinator	June 2023
Preparation of site visit schedule and indicative timetable	July 2023
Briefing of review panel members	July 2023

Review panel site visit	3-5 October 2023
Submission of the draft review report to ENQA Review Coordinator	w/c 20 <sup>th</sup> November 2023
Factual check of the review report by the Unibasq	November/December 2023
Statement of Unibasq to review panel (if applicable)	December 2023
Submission of review report to The European Association for Quality Assurance in Higher Education (ENQA)	January 2024
Validation of the review report by the Agency Review Committee	February 2024
EQAR Register Committee meeting and decision on the application by Unibasq	February or June 2024 (tbc)
Decision on ENQA membership by the ENQA Board	June 2024 (tbc)



### **ANNEX 3: GLOSSARY**

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY UNIBASQ

1. Self-assessment report;
2. Additional information:
  - 2.1. Examples of assessment reports;
  - 2.2. Collaboration agreement between The University of the Basque Country/Euskal Herriko Unibersitatea and the Agency for Quality of the Basque University System (Unibasq), for the Evaluation of The University of the Basque Country/Euskal Herriko Unibersitatea own degrees (Títulos propios);
  - 2.3. Procedure of Suggestions, complaints and claims (SQR);
  - 2.4. Guide for the Verification-Authorisation (Ex-ante accreditation), Monitoring, Modification and Ex-post accreditation of Official Bachelor's and Master's Study Programmes;
  - 2.5. Information regarding involvement of international experts;
  - 2.6. Examples of negative reports (Labels: Dual and International);
  - 2.7. Procedure for the Contentious-Administrative Phase in the Academic staff evaluation procedures
  - 2.8. Regulations for the Operation of Study Programmes Operation of Study Programmes Evaluation Committees (CET);
  - 2.9. Rules of Procedure of the Unibasq Ethics and Guarantees Committee;
  - 2.10. Information regarding Unibasq staff;
  - 2.11. Examples of experts' training materials;
  - 2.12. Protocol for the Evaluation of University International Joint Programmes according to the European Approach for its Quality Assurance;
  - 2.13. Additional information about reporting and expert panels in every QA procedure.

## ENQA TARGETED REVIEW 2023

THIS REPORT presents findings of the ENQA Targeted Review of the Agency for the Quality of the Basque University System (Unibasq), undertaken in 2023.

**enqa.**

European Association for  
Quality Assurance in Higher Education