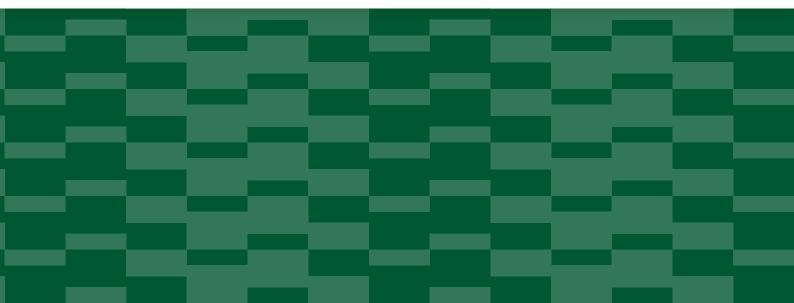


ENQA AGENCY REVIEW: ANDALUSIAN AGENCY OF KNOWLEDGE, DEPARTMENT OF EVALUATION AND ACCREDITATION (AAC-DEVA)

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EXECUTIVE SUMMARY

An Overview of DEVA in 2019

This is the third ENQA review of AAC-DEVA, the agency charged with the quality assurance of Higher Education in the Spanish Autonomous Region of Andalusia. The review panel read a self-evaluation (SAR) conducted by AAC-DEVA in 2018, examined the hyperlinks in the SAR, made themselves familiar with the web site of the agency and conducted a site visit in April 2019.

The SAR was informative and very open and self-critical in many ways. The rather complicated system – also in legal terms – sometimes made it a little difficult to understand all the procedures and the rationale behind them but everyone the panel met was very forthcoming and helped the panel with additional information and documents.

Overall, the panel found an agency well appreciated by their key constituencies and fully aware of the current change of philosophy from a more control oriented External Quality Assurance driven approach to an enhancement oriented Internal Quality Assurance driven approach. AAC-DEVA has a good relationship with the regional government. However, the review panel concluded that the agency is under a lot of duress and stress. A range of factors (i.e. legal changes, new government, changes in the management team, vacancies in key positions, more procedures) is leading to a situation where the agency is encountering some difficult pressures. Across many interview groups it was confirmed that there might be not enough resources at the moment to deal with the daily business, the system change and the projects to bring the agency forward (implementing the recommendations of the last panel to their full effect for example). This results in a situation where important reforms are delayed, ideas are not followed up on and the agency's clear commitment to institutional approaches might be subverted by a lack of time and energy to manage the change proactively.

However, the panel believes that there is a lot of potential within the agency to meet these challenges. For this reason, AAC-DEVA can rely on the considerable strengths identified by the review panel.

Under the new management in the last two years, AAC-DEVA has already implemented some important changes as a reaction to previous recommendations and in order to pave the way for the future. Procedures have been simplified to a certain degree (e.g. with regard to follow ups), students are now far more strongly involved and take full responsibility in the expert teams; the IT system has been updated and expanded with new functionalities; the internationalisation efforts have been increased and the panel saw a general spirit of cautious optimism.

Strengths of AAC-DEVA

- The agency's staff is very dedicated, experienced and loyal and is dealing in a commendable manner with the increased workload of the past years;
- The guidelines for its reviews are well developed and very helpful for all the actors involved;
- The agency has developed robust processes and is constantly trying to reflect and improve them. In this, it can rely on professional and highly committed partners on its Technical Committee and in the universities;

- The universities are by and large full of praise for AAC-DEVA's openness for suggestions, for their collaborative attitude, for their strong tendency towards constructive dialogue. They recognise major improvements in the last two years towards a more enhancement-oriented approach;
- Decisions seem to be consistent and transparent and the appeals process is clear to all the concerned parties;
- The agency is fully committed to the ESG 2015, Part 1, and follows the standards and guidelines closely in their criteria and processes.

Overview of Recommendations

On the other hand, there are also some issues that the panel diagnose as potential impediments to change and which should be addressed by the agency in the near future. The panel knows that many of these observations will not come as a surprise as they are reflected in the SAR and were voiced in meetings with the panel:

- AAC-DEVA is placing a lot of its hope for the future in the implementation of an institutional approach: everyone the panel interviewed was highly positive about this new direction. However, the panel emphasises that this change will take time and won't happen by itself. This was also the major hope of AAC-DEVA five years ago. In addition, the agency should not lose sight of the fact that there will be programme level procedures for a long time to come, so dedicating time to make sure that the methodology there fits the overall strategy/philosophy is worth the effort.
- The panel recommends that AAC-DEVA should focus more on impact/effectiveness and less on processes and procedures in the agency's methodology. There is tight rope between helping institutions to develop their IQA systems without patronising them. The panel shares the universities' belief that there might still be some further room for making the processes and criteria catalogues less complicated and bureaucratic.
- The agency's understanding of relevant stakeholders is somewhat limited as are the ways in which it involves stakeholders in the development of its methodologies. Formally, one student (representing the Student Advisory Council of Andalusia)in the Technical Committee counts as involvement but it might not be enough to really include student needs and expectations. Representatives from the labour market and civil society, but also the international experts and colleagues seem to be under-represented in the discourse on programmes and methods and the technical implementation of procedures. Maybe making more frequent use of the Technical Committee and Governing Board and creating a specific advisory board for DEVA may be helpful in this regard.

There are several issues (IQA, thematic reports, managing the change) where the agency seems to have difficulties making progress because of a lack of resources and the dominance of daily routines. The panel recommends that one solution might lie in unlocking potential for creativity and innovation within a historically rather rigid and control oriented system: Thematic reports for example could be conducted in collaboration with Higher Education researchers or PhD students; regular management meetings could be used for closing the loops in the IQA system and the meeting minutes could function as low threshold documentation; financial resources could be used to hire temporary contractual staff in order to develop some of the extra projects and as a temporary fix for workload spikes.

AAC-DEVA should reflect on the extent to which, in its work, it embodies the philosophy that it is trying to inculcate in the institutions. In some cases (not least when it comes to following up on the

recommendations from five years ago) this panel found a tendency that progress is more about ticking the boxes than about sustained improvement. Advising universities to have a clear quality policy does require that the agency itself must have such a policy. This panel could find no clear goals and objectives related to AAC-DEVA's specific challenges and activities, in particular on how the move towards institutional accreditation will be supported strategically, no concrete actions and resource planning translating from such goals, no indicators of success and no formal processes and structures making sure there will be continuity in the development of current areas of improvement. Similarly, the review panel did not find a plan of preparing staff for changes to come and a systematic communication plan directed to stakeholders inside and outside of the agency. The review panel strongly recommends a stronger institutional focus in AAC-DEVA on self-reflection, sustained planning and extended stakeholder consultation.

General Commendation:

The review panel commends the professionalism and dedication of the administrative staff during a period of disruption and unplanned changes.

Confidence in the Future of AAC-DEVA

Overall, however, the panel commends AAC-DEVA on all its achievements, in particular in the last two years. The staff is committed and optimistic and there is a strong desire to make the agency a strong player in the Andalusian Knowledge system. The current director showed a strong awareness of what needs to change and a willingness to consult with others. This is a considerable foundation upon which to build.

Compliance with ESG (2015) Standards

ESG 3.1: Partially Compliant

ESG 3.2: Fully Compliant

ESG 3.3 Fully Compliant

ESG 3.4 Substantially Compliant

ESG 3.5 Substantially Compliant

ESG 3.6 Substantially Compliant

ESG 3.7 Fully Compliant

ESG 2.1 Fully Compliant

ESG 2.2 Substantially Compliant

ESG 2.3 Fully Compliant

ESG 2.4 Fully Compliant

ESG 2.5 Fully Compliant

ESG 2.6 Fully Compliant

ESG 2.7 Substantially Compliant

INTRODUCTION

This report analyses the compliance of Agencia Andaluza del Conocimiento - Dirección de Evaluación y Acreditación (AAC-DEVA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from April 2018 to June 2019.

(As the formal title of the agency is AAC-DEVA, this is used throughout the document except when, for the purposes of clarity, the term "DEVA" (the entity within AAC-DEVA responsible for quality assurance) is required.)

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is AAC-DEVA's third review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2014 REVIEW

In 2014, the Review Panel concluded that AAC-DEVA could renew its membership and concluded that the criteria where full compliance has been achieved were:

"ENQA membership criterion 1 / Activities /ESG 3.3 (Activities), 2 / ESG 3.2 (Official status), 3

/ ESG 3.4 (Resources), 4/ ESG 3.5 (Mission Statement) 5 / ESG 3.6 (Independence), 6/ ESG 3.7

(External quality assurance processes used by the members) and 8 / Miscellaneous."

Substantial compliance has been achieved in the following criteria:

"ENQA membership criterion 1 / Activities / ESG Part 2 / ESG 3.1 (Use of external quality assurance procedures)."

Finally, the panel considered that the agency was partially compliant regarding ENQA

Membership criterion 7/ ESG 3.8 (Accountability procedures).

Thus, in summary, the agency was found to be in full compliance with ESG 3.1, 3.2, 3.4, 3.5, 3.6, 3.7.

Substantial compliance was awarded in respect of ESG 3.1/ESG part 2.

Partial compliance was awarded in respect of ESG 3.8

The Review panel made 10 recommendations that were reiterated in the letter from ENQA (26 September 2014) reconfirming AAC-DEVA full membership of ENQA for a period of 5 years. The complete statement of the recommendations conveyed by ENQA reads:

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

AAC-DEVA should make sure that the programme accreditation process and specifically, the new accreditation stage are able to foster real enhancement and contribute to the goals set for the Andalusian region: employability and enhanced institutional accountability. ESG2005, 3.1,3.3,3.5/ESG 2015, 3.1)

Regarding the number of site visits, AAC-DEVA is recommended to foresee the planning is feasible in terms of delays and resources. Universities will be visited several times per year (i.e. University of Seville will receive between 42 and 55 visits in the period 2014-2017) which will impose a heavy burden on the HEIs. An additional challenge associated to this scheme is avoid losing the global view of a given institution and to ensure consistency along the different site visits. AAC-DEVA should carefully consider these issues. (ESG 2005, 2.2, 2.4, /ESG 2015, 2.2)

AAC-DEVA is encouraged to reflect on the way the selection of experts is done and the registers of AAC-DEVA's expert database are updated so as to capitalise on its full potential. (ESG 2005, 3.7/ESG 2015, 2.4)

It is recommended that the process of selection of student experts is revised. The fact that the student expert selection procedure is completely open could lead to some problems (i.e. students could be pointed out in advanced and be encouraged to apply, which would pervert the selection process). Additionally, the Council of Students could provide some support to the agency in order to improve the selection and training of student experts. (ESG 2005, 3.7/ESG 2015, 2.4)

AAC-DEVA's Technical Commission is not yet fully functional and AAC-DEVA is therefore encouraged to remain vigilant and ensure that the student representative is really treated as an equal. (ESG 2005,3.7/ESG 2015,2.4)

Regarding the use of international experts, additional efforts should be invested to this regard, as introducing international expertise brings in important benefits in terms of introduction of an international perspective, exchange of practices and avoidance of conflict of interest. (ESG 2005,3.7/ESG 2015,2.4)

As the whole accreditation cycle is not yet implemented, it is not clear whether a follow-up after the first accreditation phase is intended. Introducing such a follow-up phase would be consistent with the spirit of the ESG. AAC-DEVA is recommended to consider this issue in consultation with the rest of Spanish agencies and the National and Regional Governments. (ESG2005, 2.2,2.4/ESG 2015, 2.2)

More work could be done in order to increase AAC-DEVA's contribution to system-wide analysis. In particular, the AAC-DEVA is recommended to prepare a publication devoted to the current state and trends of the quality assurance system in Andalusia which will enable AAC-DEVA to profit from the rich and abundant information gathered after the first verification and follow-up rounds. In consistency with the results of the 2009 AAC-DEVA review, further opportunities for cross-regional studies in collaboration with other Spanish quality assurance agencies could be explored. (ESG 2005, 2.8/ESG 2015, 3.4)

AAC-DEVA should operate its Internal Quality Assurance system in a more formal and documented way in order to ensure that continuous improvement is actually implemented. The results of the different satisfaction surveys should be formally considered. The impact of the improvement initiatives adopted should be assessed in order to ensure that continuous improvement is actually taking place. Lean quality approaches are taking place, however, some written records should be found on this improvement process, based on an annual SWOT assessment of the agency's practice. Additionally, AAC-DEVA is recommended to introduce formal feedback mechanisms addressed to the staff of the Agency. ESG, 2005, 3.8/ESG 2015, 3.6)

Concerning the international activities of AAC-DEVA, it is recommended that an international strategy is clearly defined which is consistent with AAC-DEVA's mission and available resources. (ESG 2005, 3.5/ESG2015, 3.1)

In view of the considerable resources that are allotted annually to programme accreditation and various other evaluation schemes, it can be considered somewhat disappointing that AGAE/DEVA has not yet, after many years of agency activity, been able to complete a full-wheel cyclic review, including site visits, of the Andalusian HE sector. With 11 universities making up the sector, some kind of institutional approach would certainly have made this possible, if only at the expense of some of the voluntary schemes that are currently in operation. As it now is, the external quality assurance regime presents itself as rather fragmented. It is understandable that the agency follows the regulations and plans that are set at the national or inter-agency level, but it is still recommended use its influence to make the system more coherent and holistic in its totality, and less detail-oriented." (ESG 20052.2,2.4/ESG 2015, 2.2)

The response of AAC-DEVA to these recommendations is an important component of this review.

REVIEW PROCESS

The 2019 external review of AAC-DEVA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of DEVA was appointed by ENQA and composed of the following members:

- Dr Oliver Vettori, Chair, EUA Nominee, Austria;
- Marion Coy, Secretary, ENQA Nominee, Ireland;
- Isabel Ortega, ENQA Nominee, Spain;
- Damian Michalik, ESU Nominee, Poland.

Goran Dakovic was ENQA review coordinator.

Self-assessment report

AAC-DEVA started the self-review process in April 2018. A small working group was established within the agency to write the review (hereafter, SAR) and the agency states that it simultaneously reviewed the Action Plan 2016-2020 of DEVA. The Governing Board of AAC-DEVA reviewed a draft of the SAR in December 2018, prior to its submission to ENQA.

The SAR mentions stakeholder involvement in this process and states that the draft report was presented to the Technical Committee of AAC-DEVA, the Director's Management Team, the Agency's staff, and to representatives of universities, students and evaluators.

In September 2018, Agency staff attended an ENQA seminar for agencies preparing to undergo an initial external review.

The review is a well-structured document that charts the history of the agency, the Higher Education system of Andalusia, the work of the agency and a timeline of key events from 2014-2018. The legal status of the agency is clearly explained, as is the structure of AAC-DEVA. A section of the document deals with the internal quality assurance of the agency. The SAR outlines the agency's perception of its compliance with ESG 2015 and provides evidence under each standard. The document also gives information on the international activity of the agency in Russia. There is a SWOT analysis and a section dealing with responses to the recommendations of the 2014 review.

The document provides excellent hyperlinks to other documents and to sections of the website. It has tabulated a lot of information in well-organised appendices.

The SAR describes the process of self-review and provides what proved to be an accurate picture of how the agency understands the term "stakeholder". The project team presented drafts to the internal committees, and to the universities. The staff of the agency was also consulted. There was limited consultation with students - only insofar as they are represented on the committees of AAC-DEVA. There was no evidence of wider consultation and this was confirmed during the panel's site visit.

The document describes in great detail the activity of the agency. A reader of the document might understandably assume initially that the DOCENTIA (teaching evaluation system used by universities) and IMPLANTA (institutional quality assurance system evaluation) are activities of equal magnitude to programme evaluation in the agency. This is not the case. Both of these programmes are voluntary in Spain. DOCENTIA is a programme that a university can use to implement procedures to evaluate teaching staff. Spanish quality assurance agencies then evaluate the procedures implemented by the universities. The DOCENTIA programme has had a chequered history in the region since 2012 and is not an established part of the activity of DEVA. This situation arises from matters outside the control of AAC-DEVA. There has been a very limited, recent pilot programme of IMPLANTA. AAC-DEVA would prefer to be using both these programmes more extensively but they did not form any significant component of the work of AAC-DEVA during the period of time covered by this review.

The SAR includes a separate section on the recommendations of the 2014 review panel and there is a table in the final section of the SAR that shows the responses of AAC-DEVA in the last five years. It would have been useful if the recommendations were dealt with under the appropriate heading in its evidence of compliance with each standard in the ESG. The document contains no reference to the findings and recommendations of EQAR. This oversight arose from a misunderstanding in DEVA and a change of personnel. The annual reports to EQAR, including details of its activities in Russia were provided to the panel at the beginning of the site visit.

The project team was led by the Co-coordinator of International Relations, Belen Floriano Pardal, who also acted as the agency liaison with the review panel. She assumed the role of coordinator in AAC-DEVA in mid-2018 on a part-time basis, on secondment from her university. She then took on the additional task of preparing the SAR. The panel acknowledges her courteous and professional assistance and the scale of the task that confronted her in 2018.

Site visit

The site visit took place to the AAC-DEVA offices in Cordoba from 2nd to 5th April, 2019.

In advance of arriving in Cordoba, the panel had received the SAR and ENQA guidelines and had already participated in a videoconference. At this video conference, the ENQA coordinator, Goran Dakovic, outlined the main components of a review and highlighted guidelines and good practices. The panel members had already read the SAR and the Chair of the review panel then sought initial reactions to the document. The panel then discussed any additional documentation required from AAC-DEVA to assist their deliberations. The panel agreed on the optimal configuration of meetings to be scheduled during the site visit. The secretary then undertook to prepare a draft site-visit schedule and to contact the agency with a list of additional documentation required. The principal documents requested were translations of recent minutes of meetings of the Governing Body and the Technical Committee.

The secretary prepared a draft schedule of meetings based on the ENQA template, modified to meet the local context and the key issues identified in the review of the SAR and linked documentation. This proposed schedule included meetings with the President and representatives of the Governing Body, the Technical Committee, the Managing-Director of AAC-DEVA, the Director of DEVA, the project group that prepared the SAR, the staff of the agency, University rectors, quality assurance professionals from the universities, student evaluators, national and international experts, stakeholders and a final clarification meeting with the DEVA Director.

The chair then asked that each panel member prepare and submit to him an individualised list of the principal queries and observations and top-line issues arising from more detailed consideration of the SAR, the previous review in 2014 (and follow-up), the EQAR observations following on from the last review, the agency website and the various hyper-links provided in the SAR.

Some modifications to the personnel for the meetings with the Governing Board and the Technical Committee had to be made because the Governing Board had been replaced at the end of 2018 and a new Chair appointed. These changes were necessitated by a change in regional government. In addition, the Technical Committee had also had some change in membership (planned rotation) and had not met since November, 2018.

Two weeks prior to the review panel visit, the Director of DEVA, D. Francisco Gracia Navarro, had an accident and the panel's discussions with him took place via videoconference link. The review panel appreciates his willingness to talk with them in these difficult circumstances.

All panel members submitted their observations to the Chair and he then prepared a list of key queries and identified the most appropriate session at which to address each of these issues. The Chair circulated this framework for discussion in advance of the panel's arrival in Cordoba.

The panel met in private session on the afternoon of 2nd April to make final preparations for the meetings scheduled over the following three days. The panel reviewed and amended the framework document prepared by the Chair Dr. Vettori emphasised the fact that this was a third review of the agency, reviewed the recommendations from the last review, the issues raised by EQAR and the update provided by the agency in 2016. Dr. Vettori emphasised that the panel should work to the objective of enhancement and try to ensure that its report delivered added value for AAC-DEVA.

The Chair then agreed a rotation of session leaders for each of the meetings scheduled over the following three days in order to ensure that all panel members had an opportunity to fully participate in and influence the proceedings. (For obvious reasons, the secretary did not lead any session).

Finally, the panel also met the DEVA coordinator, Belen Floriano Pardal, on the afternoon of the arrival day. She clarified for the panel the national and regional framework of Higher Education in Spain and outlined the governance changes that were a consequence of the elections in Andalusia in late 2018. She explained that a new legislative enactment in 2018 had confirmed the organisational structure of AAC-DEVA and the complete independence of DEVA in the performance of its function within the AAC-DEVA structure.

The panel also clarified the staffing arrangements in AAC-DEVA and noted that all coordinator posts were filled on a part-time basis by staff seconded from the universities. One of the five coordinator posts was vacant at the time of the visit and the panel learned that D. Navarro, the Director of DEVA, had only been in post for two years.

The Chair also arranged for the panel to review some reports the following day. He also arranged to have the panel supplied with correspondence to and from EQAR. A meeting with the IT manager was scheduled in order to see the operation of the database of experts.

All scheduled meetings took place as planned. There were some minor amendments to attendees and the full schedule of meetings is attached to this report. At the end of each day, the panel reviewed its work and looked at the evidence provided in respect of each standard in ESG 2015.

The panel held two long meetings on the final day to review all its findings. They then agreed the schedule for the preparation and submission of the report.

The AAC-DEVA coordinator, Belen Floriano Pardal, provided excellent support to the panel during the site visit.

The panel had excellent support from Milja Homan, the ENQA coordinator for the site visit and from Goran Dakovic, the coordinator of the review.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The responsibilities and authorities of the decentralised Spanish University System (SUE) are distributed between the State, the Autonomous Communities and Universities. In order to guarantee homogeneity and coherence, the SUE is regulated by the following State Organic Laws:

- Organic Law 6/2001, December 21st, which develops the distribution of University competences provided by the Spanish Constitution and the Statute of Autonomy.
- Organic Law 4/2007, April 12th, modifying the Organic Law 6/2001, in accordance with the agreements on the European Higher Education policy and the European Union boost for research in member States. This Law aims for the harmonisation of Higher Education within the framework of the European Higher Education Area by structuring the Spanish Higher Education system in three degrees: Bachelor, Master and Doctorate.

At regional level, the Statute of Autonomy for Andalusia of 1981, reformed in 2007 by Organic Law 2/2007, March 19th, provided in article 53 that:

- "1. The exclusive competences in Higher Education that correspond to the Autonomous Community, notwithstanding universities' autonomy, are:
- a) Programming and coordination of the Andalusian University System within the framework of general coordination. b) Foundation of public universities and authorisation of private ones. c) Approval of public university Statutes as well as the private universities' organisation and functioning rules. d) Coordination of the procedures for access to universities. e) The legal framework of official university degrees. f) The universities' own funding and, where applicable, state-funded management in matters of Higher Education. g) Regulation and management of the grants and scholarships system to support Higher Education and, where applicable, state-funded regulation and management in these matters. h) The retributive regime of teaching and research staff employed by public universities, and the establishment of additional remuneration for civil servant teaching staff.
- 2. The Autonomous Community shares competence on all other functions excluded in section 1, notwithstanding universities autonomy, including:
- a) Regulation of the requirements for universities and university centre foundation and recognition and the ascription of these centres to universities. b) The legal framework of public university organisation and functioning, including governing bodies and representation. c) The ascription of public or private academic centres for the provision of official university degrees and the foundation, modification and elimination of university centres at public universities, as well as the recognition of these centres at private universities and the implementation and elimination of educational programmes. d) Regulation of the university access system. e) Regulation of the regime for hired and civil servant teaching and research staff. f) The evaluation, quality assurance and excellence in Higher Education, as well as of the teaching and research staff.
- 3. The competence on the execution of issuing university degrees corresponds to the Autonomous community".

Specifically, the Andalusian University System (SUA) is regulated by:

- Andalusian Law on Science and Knowledge 16/2007, December 3rd, regulating the Andalusian System of Knowledge which favours integration among its different stakeholders and the improvement of the ability to generate knowledge through quality research and knowledge transfer to productive sectors. By this Law the Andalusian Agency of Knowledge (AAC) is established (article 27).
- Law 12/2011, December 16th, revising the Andalusian Law on Universities which regulates full integration of the Andalusian university system within the European Higher Education Area. In particular, Chapter II is integrated to Title V denominated «Instruments for University Service Quality». In Article 78, Instruments for Quality and Excellence, it is provided that: "1. Universities should establish an integrated quality management system and undergo an external review of their quality management systems every five years by the Andalusian Agency of Knowledge. The outcomes will be published in accordance with the legally established limitations".
- Legislative Decree 1/2013, January 8th, approving the revised text of the Andalusian University Law which, without including normative changes, attempts to provide a unified

and systematic text, comprehensive of the normative currently applicable in Higher Education in Andalusia.

The Andalusian Higher Education System consists of eleven universities - ten public and one private. The SAR states that in 2018 the system had ca. 230,000 students, 17,400 "teachers" and ca. 9,600 "administration and service staff". There is a collaborative association of the Universities (AUPA) and an agency that regulates access to Higher Education (DUA). There have been no applications for accreditation of additional private universities since the date of the last review.

There is a public university in every province, except Seville, where three public universities coexist - Seville (US), Pablo de Olavide (UPO) and the Andalusian International University (UNIA), which has campuses in Jaén, Málaga and Huelva- with the private university Loyola Andalusia, which has another campus in Córdoba. The University of Granada has campuses in Ceuta and Melilla.



(Distribution of Universities in Andalusia, SER, p11)

The universities of Seville and Granada accounted for 47.2% of total enrolments in the academic year 2018/19. Many of the other universities are small and this is an important factor in their response to the quality assurance regime of AAC-DEVA.

Andalusian universities provided a total of 398 bachelor and 520 master degrees and 169 doctorate programmes for the 2018/19 academic year. The oldest public universities (Granada and Seville) offer the highest number of degrees.

UNIVERSITY	BACHELOR	MASTER	DOCTORAT E	TOTAL
Almería (UAL)	29	36	14	79
Cádiz (UCA)	44	50	18	112
Córdoba (UCO)	34	39	11	84

Granada (UGR)	62	101	28	191
Huelva (UHU)	30	31	11	72
UNIA	-	18	2	20
Jaén (UJA)	34	39	20	93
Málaga (UMA)	58	61	22	141
Pablo de Olavide (UPO)	20	39	9	68
Sevilla (US)	66	88	32	186
Loyola Andalucía (LA)	21	18	2	41
TOTAL	398	520	169	1087

Distribution of official Bachelor'S, Master'S and Doctoral degrees at Andalusian universities in 2018-19. Sources: <u>Dossier Opening of University Academic Year 2018/19</u> and <u>University Loyola Andalucia website</u>.

The vast majority of students come from the region. In 2016/17 (most recent data available) 4.3% of the student body was international with 34% of that cohort coming from Latin and South America and 30% from the E.U.

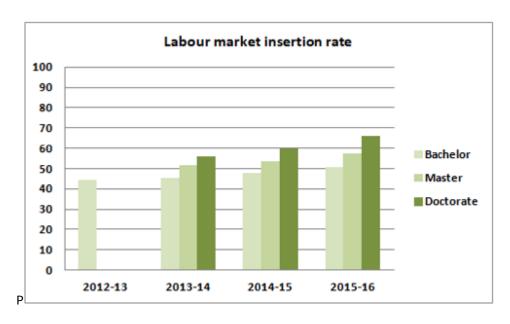
Academic indicators and Graduate Employment

The Royal Decree 1393/2007 provides three basic indicators for the quantitative assessment of official degree outcomes:

- **Graduation rate**: the percentage of students that graduate in the estimated time or an academic year later in relation to their cohort entry.
- Dropout rate: percentage of students from a cohort entry who should have obtained the
 degree the previous academic year and did not enrol the current academic year nor the
 previous one.
- **Efficiency rate:** number of credits required to obtain a degree divided by the total number of credits enrolled for by the student and expressed as a percentage.

According to the available data, the graduation rate in Andalusia is higher on Master's than on Bachelor's degrees but it is similar to the national average. On the other hand, the dropout rate on Bachelor degrees is lower in Andalusia than the national average, while the efficiency rate is similar to the national average in Bachelor's and Master's degrees.

Another essential indicator is graduate employment, referred to in the SAR as "labour market insertion". The Argos Observatory, from the Andalusian Service for Employment, provides data on the labour market insertion of graduates from Andalusian universities. According to this observatory, the percentage of labour market insertion a year after graduation has been increasing over the last few years and is higher for people with the top Higher Education level.



(Evolution of labour market insertion of graduates from Andalusian universities. Source: Data from Argos Observatory.)

The quality assurance officers from the universities had some reservations about the data source used for this information in the SAR. In particular, they suggested that it might not take into account the continuation of students in Higher Education in and outside the region.

The issue of graduate employment is an important concern in this region. The 2014 review recommendations listed this issue as one requiring attention. This issue arose during this site visit again in discussions with the Governing Board, the Ministry representative, the Director, the Students, the Stakeholders, the Technical Committee, and the University Representatives.

According to Organic Law 4/2007, April 12th, there are two different types of contracts used for teaching staff of public universities: (i) public civil servants as University Associate Professors (PTU) or University Professors (CU) or (ii) labour staff for the positions of Assistant, Doctorate Assistant Professor, contracted Doctoral Professor, Associate Professor, Visiting Professor and Emeritus Professor. A positive evaluation by the responsible quality assurance agency is necessary to access any of these contracts except for Assistant, Associate or Visiting Professors. The position of contracted Doctoral Professor with clinical connection to the Andalusian Health System is evaluated according to specific criteria. Private University teaching staff must also obtain a positive evaluation by the responsible quality assurance agency.

In 2018/19, teaching and research staff (PDI) at the Andalusian Public University System is composed of about 17,430 employees. In December 2017, 49% of teaching and research staff were civil servants and 51% contractual lecturers.

QUALITY ASSURANCE

With regard to the quality assurance system for the region of Andalusia, the following decrees established the Andalusian Agency of Knowledge (AAC) Statutes and, particularly, the Direction for

Evaluation and Accreditation (DEVA), which is the independent body within the AAC with this competence:

- Decree 92/2011, April 19th, approving the Statutes of the Andalusian Knowledge Agency (AAC), in accordance with the provisions by the aforementioned Andalusian Law on Science and Knowledge, by assigning the functions of university evaluation and accreditation, and evaluation of the Research, Development and Innovation (R&D&I) to the Direction for Evaluation and Accreditation (DEVA), as well as providing full independence and autonomy in the exercise of its competences.
- Decree 1/2018, January 9th, revising the Statutes of the Andalusian Agency of Knowledge, approved by Decree 92/2011, adapted to the new internal organisation and providing DEVA full independence and autonomy in the exercise of its functions for evaluation and accreditation in Higher Education and R&D&I evaluation.

AAC-DEVA-HISTORY

The Andalusian Agency for University Quality Evaluation and Accreditation (AGAE) was founded in 2005 with the competences established in Title V (evaluation and accreditation) of the Organic Law 6/2001, and in Title V (of university quality) of the Andalusian Universities Law (Law 15/2003). In 2011, the Law for reclassification of public sector in Andalusia (Law 1/2011, February 17th) established the Andalusian Agency of Knowledge (AAC), a public corporate agency, as the body that subrogates "all legal relations, rights and duties of the autonomous entity Andalusian Agency for University Quality Evaluation and Accreditation" which, since that moment, was extinguished. Nowadays, the AAC is assigned to the Regional Ministry of Knowledge, Research and Universities, specifically to the General Secretary of Universities, Research and Technology, under which it will act as its own entity and technical service.

The first AAC statutes were approved by Decree 92/2011, April 19th, and implemented in April 30th. The Agency has its own legal status, and has administrative and financial autonomy to carry out its activities. The functions performed by the extinct AGAE were assigned to the Direction for Evaluation and Accreditation (DEVA) which, within the AAC, exerts its independence, with respect to the rest of the Agency bodies, in the exercise of its functions of evaluation and accreditation of Higher Education institutions, teaching staff and their educational and research activities. In 2018, these statutes were modified (Decree 1/2018, January 9th) to be adapted to changes within the AAC organisational structure and its governing and management bodies. It includes a detailed revision of DEVA competences related to the assigned activities in the scope of the evaluation and accreditation of the Andalusian university system, and the assessment of Research, Development and Innovation (R&D&I) and reaffirm its management and operational independence from the rest of the AAC bodies.

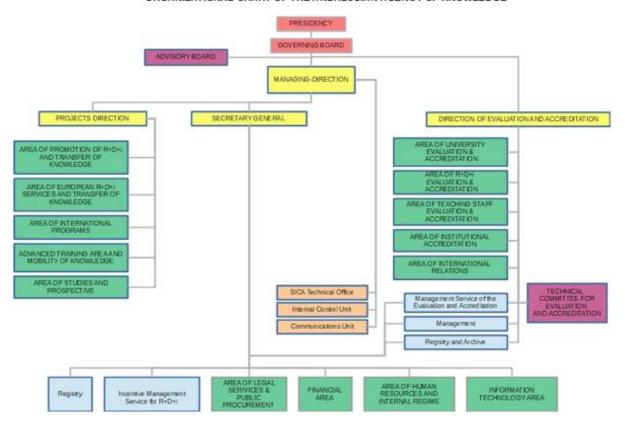
The AAC head office is located in Seville and DEVA's office is located in Córdoba.

AAC-DEVA ORGANISATION/STRUCTURE

General structure of the Andalusian Agency of Knowledge (AAC)

The bodies comprising the AAC structure are represented in the SAR in the following diagram:

ORGANIZATIONAL CHART OF THE ANDALUSIAN AGENCY OF KNOWLEDGE



AAC Organisational Chart. Source: http://deva.aac.es/?id=organigrama&LAN=en

The AAC is organised into two main bodies, one focused on R&D&I promotion and transfer of knowledge, led by the Managing Director, and another (DEVA) responsible for Higher Education and R&D&I evaluation and accreditation, managed by the DEVA's Director.

According to its statutes, the President and the Governing Board are the AAC managing and governing bodies. The Presidency is held by the head of the General Secretary of Universities, Research and Technology. The Governing Board is the highest collegiate body in the AAC that establishes its action guidelines. It comprises the President, the Managing Director, and eleven members with outstanding professional prestige from the scientific and technical fields: five representatives of the Andalusian Government Administration, (General Directors with competence in the areas of economy, finance, public administration, agriculture and health); three Higher Education and research prestigious academic members and three outstanding entrepreneurs related to innovation and technological development. This body is assisted by the DEVA's Director, with voice but without vote.

The Advisory Board is the AAC consultative body and for the institutional participation of representatives of the Andalusian System of Knowledge and other economic and social agents. It is composed of the President, the Managing Director, DEVA Director and two representatives elected from each of the following sectors: Andalusian Public universities;

Research Institutes and Centres;

Scientific or Technological Parks, Technology Centres or other entities with functions on R&D&I promotion;

Entrepreneurial Organisations;

Trade Union Organisations.

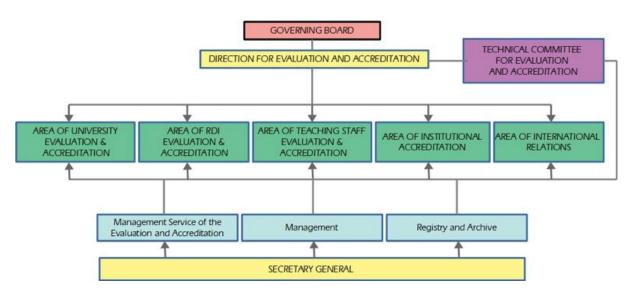
Andalusian Regional Government administration;

Andalusian University Students Advisory Council.

General structure of the Direction for Evaluation and Accreditation (DEVA)

The Direction for Evaluation and Accreditation (DEVA) reports directly to the Governing Board. In accordance with the statutes, "the Director of the Direction for Evaluation and Accreditation will be appointed by the Agency President, after Governing Board proposal, and she/he will be a prestigious member of academic and scientific areas and a civil servant. The appointment procedure will guarantee competitive concurrence." (Article 16, section 3). The statutes also state that: "The Director for Evaluation and Accreditation will perform her/his duties with full dedication, independence and impartiality, and without receiving guidelines by any particular authority with regards to her/his academic or evaluation decisions" (article 16, section 4).

The following diagram from the SAR shows the organisational structure of DEVA (as a distinct entity in AAC-DEVA):



DEVA Organisational Chart. Source: http://deva.aac.es/?id=organigrama&LAN=en

DEVA's current Director is D. Francisco Gracia Navarro and he is assisted in his role by the Manager and Legal Advisor and the DEVA coordinators of each of the five main areas of activity:

- A. Area of university Evaluation and Accreditation.
- B. Area of Research, Development and Innovation (R&D&I) Evaluation and Accreditation.
- C. Area of Teaching Staff Evaluation and Accreditation.
- D. Area of Institutional Accreditation. (vacant at the time of site-visit)
- E. Area of International Relations.

The Technical Committee for Evaluation and Accreditation (The Technical Committee) is DEVA's collegiate body for academic oversight and it is composed of the DEVA's Director, DEVA's Area Coordinators, and fifteen members, one of them a student. The Director of DEVA appoints them, after consultation with the Governing Board. This committee was renewed in December 2018. At the time of the panel visit, the Technical Committee had not met since November 2018. The functions and responsibilities assigned to this Committee are:

- A. Approval of the accreditation and assessment plans and programmes.
- B. The establishment and approval of the assessment and accreditation criteria.

- C. Monitoring compliance with the accreditation plans and programmes by the organisational structure.
- D. Approval, where appropriate, of the necessary measures for the correct functioning of the organizational structure committees.
- E. Drafting reports and studies on matters within its competence.
- F. Knowledge and valuation of the reports on the outcomes of the evaluation and accreditation plans and programmes.
- G. Knowledge of the selection criteria and procedures and appointment of the evaluation committees and commissions.
- H. In general, all those attributions regarding the performance of its strictly technical and other functions delegated by other bodies of the Agency.

AAC-DEVA FUNCTIONS, ACTIVITIES, PROCEDURES

AAC-DEVA is engaged in the following range of activities:

- Promoting participation in R&D&I International Programmes;
- Encouragement of knowledge transfer;
- Realisation of technological and prospective studies about R&D&I in Andalusia;
- Promotion of talent;
- Evaluation and Accreditation.

The Evaluation and Accreditation activity is assigned to DEVA. Thus, DEVA is responsible within the AAC-DEVA for promoting and ensuring quality in the Andalusian university system by means of the evaluation, accreditation and follow-up of programmes, institutions and people in accordance with "the principles of activity in the public interest, with publicity and transparency, good administration, social profitability and responsibility" (Statutes, title 1, article 2).

The principal activity of the agency is **the mandatory quality assurance of programmes of study.** This involves a number of procedures: verification, follow-up, modification, accreditation renewal. According to Royal Decree 1393/2007, the study plans of Higher Education programmes must undergo a mandatory procedure for verification (first accreditation), follow-up after implementation, and an accreditation renewal process. Accreditation renewal is performed every 4 (Master's degree of 60/90 ECTS), 6 (Bachelor's degree of 180/240 ECTS and Doctoral Programmes), 7 (Bachelor's degree of 300 ECTS) or 8 (Bachelor's degree of 360 ECTS) years after implementation.

The volume of activity associated with the quality assurance of programmes occupies most of the time and resources of DEVA.

As outlined on p.9, there are some additional voluntary programmes operated by the agency that are also used in other regions of Spain. DOCENTIA is a programme for the quality assurance of teaching staff. In order to support Spanish universities, all the agencies in Spain have signed a cooperation agreement with ANECA, and the programme is developed and implemented by all the agencies. AAC-DEVA signed a cooperation agreement with ANECA in 2007 to collaborate on the DOCENTIA Programme. The supporting guide used by AAC-DEVA is developed by all the quality agencies participating in this programme, so that institutions can design and implement an evaluation programme of their teaching staff. There is a very limited uptake of this programme for reasons outside the control of AAC-DEVA.

Universities may also engage in a process for the certification of their internal quality assurance systems (IQAS). This procedure, it is hoped, will act as a stepping-stone towards a system of institutional accreditation. This process is called IMPLANTA in the AAC-DEVA catalogue of processes. Again this is a voluntary procedure and there has been a limited recent pilot that had mixed results. No formal evaluation of the pilot had taken place at the time of the site-visit as the evaluation had just been completed. Universities may also choose to seek to have their internal quality system assessed by ANECA using the AUDIT programme.

The following table from the SAR is a summary of types of activity:

	PROGRAMME
OFFICIAL DEGREES	VERIFICATION
	FOLLOW-UP
	MODIFICATION
	ACCREDITATION RENEWAL
	DOCENTIA
INSTITUTIONS	IMPLANTA
	INSTITUTIONAL ACCREDITATION
	PRIVATE UNIVERSITIES EVALUATION
	ACCREDITATION OF FOREIGN-LANGUAGE PROFICIENCY
	ACCREDITATION OF CONTRACTUAL TEACHING STAFF
STAFF	EVALUATION OF EMERITUS TEACHING STAFF
	REGIONAL ALLOWANCES
	R&D&I PROJECTS EVALUATION
RESEARCH	RESEARCH GROUPS EVALUATION
	UNIVERSITY RESEARCH INSTITUTES EVALUATION

AAC-DEVA's Evaluation Activities. Source: SAR p22)

For the purposes of this review, all the activities listed under "Official Degrees" and 'Institutions" were reviewed.

In its SER, AAC-DEVA provides a table of activity conducted in 2018:

	PROGRAMMES	EVALUATORS	COMMISSIONS
	Verification	145	8
	Modification	143	O
	Follow-up	99	8
	Accreditation renewal	115	14
	Docentia	4	1
Degrees/Institutional evaluation	Implanta	15	3
	Institutional accreditation	-	-
	Private universities evaluation	-	-
	Accreditation of foreign-language proficiency	5	1

Teaching staff evaluation	2	21	7
R&D&I evaluation	10	298	17

Number of evaluators and commissions for the different assessment activities in 2018. SER, p 56

AAC-DEVA stressed in the SER and in discussions with the panel that its ultimate objective is to move to a system of Institutional evaluation and accreditation. Such a move would require the implementation of recent legislative change (Resolution of March 2018), Ministry approval and a considerable culture change in the system as a whole.

In addition, AAC-DEVA provides quality assurance of the certification and accreditation of foreign language programme assessment operated by the universities.

Since the last review in 2014, Andalusian universities have requested verification for 26 Bachelor's degrees, 320 Master's degrees and 19 Doctoral programmes of which there have been favourable reviews for 24 (92.3%), 262 (81.9%) and 13 (68.4%), respectively. The requests corresponding to the verification call of 2018 are not included in the SAR given that the appeals submitted to the Spanish University Council by Andalusian universities have not been resolved at the time of writing the report. The review panel heard that this issue was resolved in the interim.

Since 2012, the follow-up of 870 Bachelor's Degrees, 1039 Master's degrees and 371 Doctoral programmes has been conducted. A full table of this review activity is provided in as annex to the SAR.

Since the last review by ENQA, 456 modifications for Bachelor's degrees, 305 for Master's degrees and 80 for Doctoral programmes have been reviewed, from which 415 (91%), 279 (91.5%) and 69 (86.25%), respectively, were positively evaluated.

The accreditation renewal of Andalusian official university degrees is managed by AAC-DEVA. According to the procedure established in Andalusia, the competent regional ministry publishes an annual resolution through the General Secretary for Universities, Research and Technology, providing the procedure and deadlines for the submission of accreditation renewal requests of the Andalusian University System official degrees.

Taking into consideration the guidelines approved by REACU and the ESG 2015, AAC-DEVA issued two guides, one for the accreditation renewal of official Bachelor and Master degrees, and another for Doctoral Programmes.

At the time of the last evaluation by ENQA in 2014, the cycle of official degree evaluation was incomplete. A pilot phase for accreditation renewal was established in 2014/15, with the participation of 20 degrees of 9 universities. Since its implementation, 352 Bachelor's Degrees (88.66% out of the verified ones) and 326 Master's Degrees (39.60% of the verified ones) have renewed their accreditation. The deviation with respect to the total of verified degrees, further emphasised in the case of Master's degrees, can be explained because (i) requests for degree verification are annually submitted, without corresponding to the accreditation renewal; (ii) some degrees are in the process of no longer being offered but are replaced by similar new ones that have to be verified, and (iii) because of degree withdrawal that universities make themselves (10%) prior to the accreditation renewal process to avoid a negative result. This is a clear example of how universities detect degrees with problems before completing the accreditation renewal cycle, which leads to their modification or withdrawal. Degree withdrawal must guarantee the students' rights to complete their studies. In the SAR, AAC-DEVA states that the highest deviation noticed in Master's

degrees can be explained because it is easier to adapt these degrees to the current offer and demand as most of them they are taught in one year (60 ECTS). In addition, the adaptation of Master's programmes that enable professional attributes to the regulatory normative changes requires a new verification/modification.

A pilot phase of the accreditation renewal of Doctoral programmes was carried out in 2017/18 with the participation of 10 Doctoral programmes from five different Andalusian universities. With the aim of improving the procedure, an outcomes report has been published including the main global results and the improvements suggested by the evaluation commissions and participant universities which will be provided in the next updated version of the guide.

The exchange of documents with universities is made through an AAC- DEVA electronic application in which all the process information is stored and institutions can only have access to their own information. The reports issued by AAC-DEVA are used by the Spanish University Council, the body responsible for renewing the accreditation of official university degrees according to the current regulations, to make the final decision.

The panel is very aware of the magnitude of this task and notes that notwithstanding the worries of the last review panel about the feasibility of completing the cycle, this has been achieved. Its completion may have had the unintended consequence of created other difficulties for AAC-DEVA, which are mentioned in the introduction to this report.

Evaluation activities at international level

Based on an agreement with the Russian quality assurance agency AKKORK, AAC-DEVA has carried out degree accreditation according to the standards and guidelines established by AAC-DEVA programme for Degree Accreditation and the assessment of the implementation of the IQAS, in accordance with the criteria established in the IMPLANTA programme. The information related to this activity can be checked online on the AAC-DEVA website.

The AAC-DEVA signed in 2010 an agreement with the Chilean accreditation agency AcreditAccion, which was renewed in 2014 and that, at the date of this report, is undergoing an updating process. No evaluation activities have been performed to-date with this agency.

AAC-DEVA'S FUNDING

Spanish quality assurance agencies for university evaluation and accreditation, both at national and regional levels, use public funds, which are administered by the corresponding public administration bodies.

AAC-DEVA does not charge the universities a fee for carrying out any of its activities. Both AAC-DEVA and the universities stated that they are happy to continue to operate in this way.

AAC-DEVA operates with one budget within which the Director of DEVA receives a portion of the budget earmarked specifically for the activities of DEVA. The Director of DEVA, assisted by the finance and legal managers prepares an annual budget requirement. The Managing-Director of AAC-DEVA then incorporates this into the total budget requirement for the agency and negotiates its allocation with the Regional Ministry.

The AAC-DEVA annual accounts are formulated by the Managing Director and they are submitted to the Governing Board for approval. Additionally, the agency operates under the public accounting regime, with the obligation of reporting in accordance with the provisions established by the Revised General Law for Public Treasury of the Andalusian Regional Government.

AAC-DEVA confirmed that there is no problem with accessing the required funding for the operation of the agency. The Director of DEVA and its finance and legal manager all confirmed that AAC-DEVA has no problem in accessing its requested budget.

In order to understand the operation of AAC-DEVA, it is important to distinguish between its budget allocation and its staffing allocation. Permanent public posts can only be created and filled with the prior approval of the Ministry. Thus, while the agency can use its budget for temporary work or to contract in expertise, it cannot create additional permanent posts. The agency does acknowledge that it is not easy to get permanent positions approved. Thus the agency has a pool of permanent administrators but its academic coordinators are part-time positions filled by secondment from the universities. The Director post is also filled on a contract basis. The current director has been in post for 2 years and the previous director had been unavailable for some time because of illness.

FINDINGS: COMPLIANCE OF AAC-DEVA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2014 review recommendation:

"The panel found DEVA to be fully compliant with ESG2.1, 2.2, 2.3, 2.5, 2.6, 2.7 and substantially compliant with ESG 2.4, 2.8. The overall judgment of the panel regarding section 2 of the ESG is that DEVA is substantially – or close to fully – in compliance with the standards.

Overall, the panel got the impression that the first round of the verification and follow-up processes were rather bureaucratic and control based. DEVA should make sure that the programme accreditation process and specifically, the new accreditation stage are able to foster real enhancement and contribute to the goals set for the Andalusian region: employability and enhanced institutional accountability.

Regarding the following stage (the accreditation phase and the organization of site visits), a number of challenges have been pointed out, namely, the great number of visits involved according to the current calendar (which will certainly suppose a considerable workload for both the HEIs and the agency) and the risk of losing institutional perspective."

Evidence

The review panel noted the large volume of activity carried out by AAC-DEVA. The bulk of this activity is at the level of programme evaluation. This involves procedures for programme verification, follow-up, modification and accreditation renewal. Since the date of the last review, the agency has completed the cycle of reviews, which was partially complete in 2014. In total the agency has completed over 1000 programme level reviews. The panel notes that it is a regulatory requirement that the agency carry out this work.

When considering its activities in the context of strategy and policy, the AAC-DEVA SAR makes reference to the strategic plan of AAC and to an 'Action Plan" for DEVA. The mission, vision and values listed in the SAR are described as "taken from the 2016-2020 Action Plan." The SAR also states that the action plan was reviewed as part of the preparation of the SAR.

An annual report is prepared by the agency and is published on its website. In addition, a separate listing on the major evaluations carried out each year is published.

The ESG Standard requires that "agencies should ensure the involvement of stakeholders in their governance and work". In its SAR, AAC-DEVA lists the involvement of the university representatives and the student representatives on its Governing Body and Technical Committee as examples of stakeholder participation. It also describes the process of consultation with the universities in the development of its procedures and guidelines. It also lists the existence of a mailbox for suggestions that is open "to all stakeholders and society".

The review panel could not find a Strategic Plan specifically dedicated to DEVA itself in the documentation. The Director confirmed its absence, stated that it was in the process of being developed and explained that the process of preparing the SAR had taken up available resources. The Director explained that it was not possible to include students in the Governing Board because the statutes of the agency do not allow it. He said that they were looking for other solution like the establishment of a Students Body inside the AAC-DEVA. Meanwhile, the Director attends the meetings of the Andalusian Students Association to try to collect their opinions.

The DEVA Director reports twice a year to the AAC-DEVA Governing Body. The SAR co-ordinator confirmed that very little of the work of the Governing Board is concerned with the quality assurance activities of DEVA itself and the review panel was able to see the extent of engagement of the Governing Body specifically with DEVA through a review of recent minutes of the Governing Body.

The panel met with four members of the Governing Board. They confirmed that the Board had met twice in the last year, in July and December, and that this was the usual pattern. The Board members are sent papers in advance of the meeting. These include reports on evaluations and the budget of the total agency. The Board was given a presentation last year on the ENQA review by the Director of DEVA and asked to approve the SAR.

Board members stressed that they had to deal with a lot of information last year and that there was not a lot of time for discussion or follow-up. At the time of the review panel visit in April 2019, no meetings had taken place between the newly constituted Governing Board and the Advisory Board, as a new Advisory Board had not been formed. There had been no direct contact between the Governing Board and the Technical Committee of AAC-DEVA. The review panel was notified at a meeting with key function managers that the Technical Committee of AAC-DEVA had not met since the previous November although it should meet at least every three months. The changes at governance level and the rotation of membership of the Technical Committee were given as reasons for the failure of the Technical Committee to meet. The Director also cited the pressure of work and preparation for the review as other reasons.

The Governing Body members were asked what they identified as the key challenges for AAC-DEVA over the next five years. They stated that AAC-DEVA needed to show the Universities that there was added value and positive impact to be gained from the quality assurance activity of the agency. They emphasised the need for a culture of collaboration. They felt that AAC-DEVA needed to focus more on impact. One member of the Governing Board stressed the importance of having some members from outside the University/Higher Education sector and described the universities and AAC-DEVA as "somewhat apart" from enterprise and business. This sentiment was echoed at the stakeholder meeting with comment about the need to ensure the currency and relevance of curricular content. The student representative on the Technical Committee spoke of the need for AAC-DEVA to pay

particular attention to the quality assurance of the internships, which are an essential component of study programmes. The ministry representative said that the issue of the quality assurance of internships had been raised with the Ministry by the Andalusian Student Council at its annual meeting.

The universities acknowledged the high administrative burden for AAC-DEVA created by the legal regulatory requirements. However, they argued that the "culture of control" mitigated against the creation of the conditions for enhancement both within AAC-DEVA and in the system.

All those interviewed agreed that the agency operated fully independently and that the government valued its work.

The member of the advisory board who has an entrepreneurial background confirmed that she did not know what the agency did in advance of being asked to serve on the board.

Analysis

The review panel found the absence of a strategic plan for DEVA itself (within the AAC-DEVA structure) to be a major reason for the lack of a developmental focus in the agency. The panel notes and accepts that the regulatory environment that requires mandatory programme evaluation absorbs a substantial amount of the resources of the agency but it is not a sufficient explanation for the failure of the agency to develop a clear strategy for enhancement. Such a strategy would also help to pave the road towards future institutional accreditations. As a consequence, the review panel concluded that AAC-DEVA was a very busy agency but that it was not making optimal use of its resources or time. In particular, the lack of a strategic focus resulted in a focus on short-term goals and fragmented activity. This mirrors the findings of the 2014 review panel and indicates an insufficient focus on addressing this recommendation from the last review.

The panel heard repeatedly from staff, co-ordinators, administrators and the DEVA director about the scarcity of time and resources. The agency is very busy administering one component of quality assurance and as a consequence has not developed any strategy to lead the agency and the system to more effective collaborative working relationships.

The staffing structure of the agency is heavily reliant on the appointment of university personnel to temporary management positions. This applies to the post of Director and to all the 5 co-ordinator posts (which are part-time). AAC-DEVA appoints the Director who is on leave from his professorial post. The DEVA Director then appoints the co-ordinators. This causes dis-continuities in strategic focus and business strategy. Clear and explicit goals and objectives are not defined. In the absence of a well-developed strategic plan with cascading goals, indicators and outcomes, attention is focussed on the immediate rather than the important and long-term. The panel heard on several occasions of "discussions" of issues but saw no evidence of a structured approach to creating solutions to well-known and long-standing problems.

The work plan is essentially an outline of planned programme evaluations and does not contribute to agency or system evolution. This creates frustration for both the agency personnel and the universities. In all meetings with agency staff and management, there was a focus on the constraints under which they operate. All expressed a desire for a move away from programme evaluation to institutional evaluation. The same comments were made by both the agency and the universities to the 2014 panel. However, there is no evidence that the two parties (Universities and agency) have

worked on a collaborative strategy to address their common concern and difficulty. This is an obvious area where AAC-DEVA could provide system-level leadership.

The governance structure, the infrequent meetings of statutory committees and the lack of contact between the various internal advisory and oversight committees contributes to the lack of strategic focus. There is no evidence of governance level oversight of strategic planning or review.

The SAR devotes considerable time to describing the voluntary programmes for teacher evaluation (DOCENTIA) and internal quality assurance system evaluation (IMPLANTA). Neither of these programmes has any real traction in the region or any substantial impact on system development. Therefore the review panel concluded that the agency, as at the time of the last review, continues to be absorbed with one facet of quality assurance and that the creation of a system-level culture of quality enhancement has not made substantial progress.

AAC-DEVA appears to have engagement with a limited number of stakeholders. The agency has very strong connections with the universities, improved but still limited relationships with student representative groups and a weak working relationships with other civic and social groups. This lack of engagement is reflected in both the composition, working arrangements and internal interaction of the agency's committees. Strengthening the relationship between the agency and stakeholders will certainly foster the real and sustainable enhancement of Andalusia's Higher Education area.

Panel recommendations:

As a matter of urgency, DEVA should complete its own Strategic Plan.

AAC-DEVA should conduct a review of its organisational structure with a specific focus on the DEVA structure. External expertise should inform this exercise.

AAC-DEVA should begin the process of much wider stakeholder engagement.

Panel conclusion: Partially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

AAC-DEVA has an established legal basis and is formally recognised as the quality assurance agency of Andalusia by both the regional and national government. The AAC was founded in 2007 by the Andalusian Law on Science and Knowledge 16/2007 and it was formally constituted with the approval of its statutes in 2011. According to the statutes, modified in 2018, DEVA (as an independent unit within AAC-DEVA) is assigned the following functions:

A. Evaluation of Higher Education provided by universities and Higher Education centres of the Andalusian University System.

- B. Evaluation, certification and accreditation of the university internal quality assurance systems, including those related to the teaching staff academic function.
- C. Evaluation and accreditation of university teaching staff contractual modalities.
- D. Evaluation of university institutions and centres.
- E. Evaluation, certification and follow-up of R&D&I programmes and the Andalusian Knowledge System activities.
- F. Other evaluation and accreditation functions within the Agency competency assigned by Law, and other regulations currently in force.

AAC-DEVA performs all these functions within an official public entity linked to the Regional Ministry of Economy, Knowledge, Enterprise and University. The AAC-DEVA's director enacts official resolutions in the exercise of her/his administrative faculties.

Decree 1/2018, January 9th, revising the Statutes of the Andalusian Agency of Knowledge, approved by Decree 92/2011, adapted to the new internal organisation and provided DEVA with full independence and autonomy in the exercise of its functions for evaluation and accreditation in Higher Education and R&D&I evaluation as an independent entity within the legal framework of AAC-DEVA

The official status of the agency was confirmed to the panel in its meetings with the current and former presidents of the Governing Board of AAC-DEVA and the Ministry representative. This official status is acknowledged by the universities in the system.

AAC-DEVA is also the authorised source of data on the Higher Education system of its region and it contributes this data to the generation of official national statistics and reports.

AAC-DEVA has been on the EQAR register since 2009.

Analysis

The review panel was fully satisfied that the AAC-DEVA has an established legal basis. This was confirmed in the legal statutes and reiterated in the amendment of 2018, which was passed to confirm the internal separation of function of DEVA inside the AAC-DEVA structure.

The panel understands the national legal constraints under which AAC-DEVA operates in respect of the requirement to conduct programme level evaluations.

This legal status enables AAC-DEVA to operate with complete legal authority in the functions devolved by law to it.

The panel noted the complete acceptance of the need for an established legal basis for AAC-DEVA by the Ministry and The Governing Authority. The Universities also expressed their confidence in the operation of this legal independence. AAC-DEVA has worked effectively to ensure understanding of the need for this legal independence and to utilise this independence in an appropriate manner.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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

2014 review observation:

"The programme accreditation process (one of the key processes that have been analysed in order to judge compliance) is heavily regulated at the Spanish level. The main features of the procedure as well as the items that should be taken into consideration are given. In consequence, the degree of independence of DEVA is somehow limited. This is a common feature of all Spanish agencies. However, the panel was confident that, to the extent they are allowed by the regulations in force, DEVA is acting in a professional and independent way."

Evidence

For the purpose of administrative and legal reporting, AAC-DEVA is a single agency that receives a single budget from the Ministry. This agency has a single governing body and that governing body operates in relation to the two internal entities, AAC and DEVA. AAC-DEVA is the focus of this ENQA review as it is the entity that is legally charged with the operation of the quality assurance system for Higher Education of Andalusia, in compliance with the standards of ESG 2015. Within the AAC-DEVA structure, DEVA operates with autonomy in respect of the quality assurance of the Higher Education system of the region.

AAC-DEVA continues to operate in a heavily regulated environment and is legally required to carry out programme level evaluations. Acknowledging this national and regional context, DEVA does act independently and is autonomous.

The legal independence of AAC-DEVA is confirmed in its statutes. The AAC statutes (article 16, part 1) state that the "Direction for Evaluation and Accreditation is the body dependent on the Governing Board, which will be independent for the exercise of its functions of direction, coordination and management in matters of university evaluation and accreditation, university teaching staff evaluation and accreditation, R&D&I evaluation and institutional and international relations related to the aforementioned issues".

Additionally, the DEVA director "will perform her/his position with full dedication, independence and objectivity, and will not receive express instructions from any authority with respect to academic or evaluation decisions" (article 16, part 4). He/she will be directly dependent on the Governing Board to which he/she will report on AAC-DEVA activities.

The DEVA's director is appointed by the AAC Presidency, after proposal by the Governing Board, through a procedure, which guarantees competitive concurrence. The AAC-DEVA Managing Director publishes a call for applications for the post of DEVA Director outlining the candidate requisites and the application and selection procedure. She/he has to be a prestigious academic or scientific scholar and must have the condition of civil servant.

The DEVA's Director has independence to establish the different areas of work within DEVA and to appoint the necessary technical collaborators to coordinate those areas. In addition, he/she is

responsible for appointing the members of the evaluation commissions, on the recommendation of the area coordinators.

This organisational independence is emphasised in the Code of Ethics of the AAC-DEVA which states that "in the assessment, certification and accreditation processes of the universities and their faculty, as well as in the management, assessment and accreditation processes of research, development and innovation activities of the Andalusian Agency of Knowledge agents, the workers of the Agency and its collaborators hired for this area shall enjoy complete independence" and that "the principle of independence has special relevance when performing the processes of assessment, certification and accreditation". The legislative changes of 2018 clarified the independence of the agency's work from third parties.

Operational independence is evident in how the agency controls its own procedures and methodologies. Experts are recruited from outside of Andalusia to avoid conflicts of interest and the expert panel is responsible of the final reports' content. AAC-DEVA staff provides methodological and practical support to the panel. This procedure was confirmed in discussion with representatives from the expert panels. The review panel also met a group of members of the Technical Committee that is responsible for the oversight and approval of protocols. The Technical Committee members confirmed that they carried out this function.

A separate committee consisting of panel chairs and secretaries reviews reports. They confirmed that they were sent all documentation in advance and their principal function was to ensure transparency, adherence to guidelines and consistency.

The evaluation reports are approved by the independent, expert panels (article 16, point 7 of the statutes). Those outcomes are binding for the AAC-DEVA's director who enacts the corresponding resolutions in the exercise of his/her administrative faculties, which are subject to administrative law, in accordance with article 69.1, Law 9/2007, October 22nd. The independence of formal outcomes is recognised in the legislation and is well understood and valued by all stakeholders.

The independence and autonomy of the agency was confirmed in meetings with representatives of the Governing Body, the universities and the key function managers.

The finance and legal managers both confirmed the budgetary independence of AAC-DEVA and of DEVA within that structure. They also acknowledged the difficulty in getting ministry approval for any increase in established staff numbers but added that there was no problem in accessing funding for any work required.

Analysis

The agency operates with independence and autonomy within the constraints of the national and regional legal framework. The Director of DEVA operates free from any unwarranted external interference. This independence extends right through the work of the expert panels and the Technical Committee.

AAC-DEVA operates independently in developing its own evaluation, accreditation and certification procedures and in the selection of its experts. These procedures are outlined in the SAR and there are hyperlinks in the document to all relevant legal confirmations of this independence and autonomy.

The review panel checked the documentary record and also sought the views of the universities on the independence of AAC-DEVA. The reality of the agency's independence was confirmed by the statements of the university representatives. The Governing Body and the Ministry representative were emphatic in their assertion of both the legal and practical independence and autonomy of the agency.

The panel found strong confirmation of the independence of AAC-DEVA and widespread recognition of the value of this independence among its stakeholders.

Panel conclusion: Fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

2014 review recommendation:

"The panel appreciates the efforts made by the agency in order to produce annual reports and meta-analysis of its multiple activities. However, the panel considers that more work could be done in order to increase DEVA's contribution to system-wide analysis. In particular, the panel recommends the preparation of a publication devoted to the current state and trends of the quality assurance system in Andalusia which will enable DEVA to profit from the rich and abundant information gathered after the first verification and follow-up rounds. In consistency with the results of the 2009 DEVA review, the panel believes that further opportunities for cross-regional studies in collaboration with other Spanish quality assurance agencies could be explored.

As for the criteria concerning system-wide analysis (ESG 2.8), the panel considers that more work could be done to this regard. In particular, a publication concerning the current state and trends of the quality assurance system in Andalusia would be appreciated."

Evidence

AAC-DEVA publishes an annual activity report and this is available on its website. AAC-DEVA collaborates in the development of the annual report on the status of the Spanish university external quality assurance system published by ANECA, the National Agency for Quality Evaluation and Accreditation. This report includes global data on the different external quality assurance activities provided by the Spanish quality assurance agencies that belong to the REACU network. It is addressed to the general public and to the relevant Ministry in Higher Education. It provides, not only a description of the activities of the external review agencies, but also a critical analysis of the outcomes obtained.

In 2017, the first thematic session was organised by AAC-DEVA on the Andalusian official degrees evaluation cycle. At this meeting the AAC-DEVA brief report, "Analysis and Evaluation of the Cycle for Verification, Follow-up and Accreditation of Official Bachelor and Master University degrees in Andalusia (2009-2016)" was presented. This report gathered data from verification, follow-up and accreditation renewal processes between 2009 and March 2017. This analysis focused on bachelor and master level degrees as the cycle of review of Ph.Ds. had not been completed. The methodology

followed to write the document relied upon a working group composed of vice-rectors and quality directors from four Andalusian universities appointed by AUPA, AAC-DEVA staff and three presidents of the expert panels from different fields of knowledge.

The resulting document describes in a brief manner the processes of evaluation and gathers statistical data from different open calls, universities or types of degrees. It also assesses the evaluation processes and their results, highlighting the strengths and weaknesses. It also contains a number of recommendations for improvement collected from the analysis of weaknesses. The report was sent to all Andalusian universities, experts that collaborate with the AAC-DEVA and other Spanish quality assurance agencies and all were invited to a session in which the report was presented and analysed. Final conclusions were updated to take account of the session results. All the information on this event, including the programme, videos on the participant presentations and final report, is available on the AAC-DEVA website.

In 2018 AAC-DEVA issued a report that collated and analysed all the recommendations on compulsory external internships that had appeared in all Bachelor and Master panel reports. The issue was also mentioned to the panel by the members of the Technical Committee, the students' representative and the Ministry official. The purpose of the AAC-DEVA report was to provide guidance and assistance to the universities in respect of the quality assurance of mandatory internships. This was an important issue as it gave rise to an exceptional volume of appeals in that year. This report is published on the agency web site.

Notwithstanding this evidence of progress, the review panel accepts however that the AAC-DEVA assessment in the SAR of continuing weaknesses in relation to thematic analysis is accurate. The DEVA Director identified the lack of thematic analysis and the failure of the agency to produce policy papers as areas of weakness in frank and thoughtful contributions to discussions with the review panel. He stated that there had been some discussion with some universities about collaboration on this type of work but that no concrete steps had been taken. He cited lack of resources as the reason why the agency had not made as much progress as it wished in this area.

The members of the Technical Committee spoke of the need to create a system with a greater focus on "self-regulation" and their belief that the universities needed the assistance and leadership of AAC-DEVA to make this transition. They also suggested that there is scope for additional simplification of the programme evaluation procedures and that this would free up some resources for analytical work. The Technical Committee members felt that there had been improvements in the last two years and that this must continue. One member spoke of the need for the agency to "create time to develop its thinking". Another member spoke of the need for AAC-DEVA to make decisions about discontinuing some lower order unnecessary scrutiny and that this would benefit both AAC-DEVA and the Universities.

The university rectors spoke of the need to move the system away from a focus on control to a more collaborative and enhancement-based approach. They felt that more collaboration should be used to bring a stronger analytical approach to the work of the agency. Academic coordinators and administrative staff all acknowledges that there had not been enough progress on this recommendation in the 2014 report.

The finance director confirmed that there is no difficulty in accessing funding for specific projects or contract work should it be requested in order to make progress on these deficits identified by AAC-DEVA itself

Analysis

The review panel acknowledges the honesty of AAC-DEVA in its SWOT when it identifies an ongoing weakness in relation to transversal analysis. The agency knows what it needs to do and, in its interviews, the panel heard several worthwhile suggestions on how the agency could create a feasible project to address this deficit. The panel also formed the view that the agency staff has much to offer to this work. The agency would also benefit from utilizing some of the expertise in the Spanish Higher Education sector. To take this step, the agency needs to first prepare a realistic and time-bound project plan and set itself specific targets and measurable outcomes.

The panel notes in respect of the recommendation of the 2014 panel that there was little response to this recommendation until two years ago. (It notes a similar pattern with other recommendations). There was no structured response put in place in 2015 and this has created the current difficulty. The changes in management and academic coordinator posts during the last five years appear to have impacted on the response to the 2014 recommendation. In the absence of clearly defined goals and impact and outcome indicators, it is difficult for new post holders to work effectively. In order to prevent a recurrence of this failure to respond to recommendations, AAC-DEVA needs to establish a methodology for sustained project planning.

AAC-DEVA continues to be absorbed by the processes associated with programme evaluation and will have to implement an internal re-orientation in order to ensure that the breadth of activity required to foster enhancement is put in place. Greater collaboration between AAC-DEVA, the universities and perhaps other quality assurance agencies could result in the type of system-level evaluation that would improve the effectiveness of the system. In addition if the institutions and AAC-DEVA worked more effectively with regional stakeholders, it would focus attention on the utility, currency and transferability of teaching and learning in the region.

Panel recommendations:

The review panel recommends that immediate steps be taken to start a programme of thematic analysis through the use of project funding and in association with the universities of the system. The thematic analysis of existing reports would be a useful starting point and it should, *inter alia* address the issue of regional priorities.

Panel conclusion: Substantially compliant

ESG 3.5 RESOURCES

Standard:

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

Evidence

AAC-DEVA operates with an establishment of 20 staff, 17 with labour contracts and 3 civil servants. This group includes the key administrative managers covering the legal, financial and IT functions. The administrative managers have a lot of experience in the agency. In addition 5 academic coordinators are appointed by the Director. At the time of the review panel visit, one of these posts was vacant. These are part-time, temporary, posts filled by university employees. There is no deputy director post. As previously noted, the Director is in post for 2 years and the previous Director had been unavailable for some time prior to the current appointment because of illness.

In the conduct of evaluations, AAC-DEVA uses external experts and has in place a database of those experts, which is used to create panels. There are 3.818 experts registered on the database at present. The current composition of the database is 75% academic experts, 10.5% students, and 6% professional. There continues to be a low number of international evaluators registered with the agency.

Spanish agencies for university evaluation and accreditation, both at national and regional levels, use public funds, which are administered by the corresponding public administration bodies. AAC-DEVA confirmed to the panel that it had been allocated its full requested budget in each year since the last review in 2014. The finance manager also confirmed that it is possible to get funds for specific projects. She did not see any merit in asking the universities to pay individually and proportionately for the work of the agency. She stated that this would simply be an unnecessary step, as all funding would ultimately be coming from the same source. The universities indicated that they are happy to continue the current funding mechanism.

At every meeting with internal staff and committees, the review panel was told that there was insufficient time and resources to do anything other than comply with the legal requirement for programme level evaluation. However, the finance manager stated that it was possible to get funding for specific projects and the Director said there had been some discussion with the universities about collaboration but it had not resulted in any outcomes.

The following statement appears in the SAR:

"Despite the fact that with these human and material resources the AAC-DEVA can perform its evaluation activities correctly, it would be necessary to have a prospective unit exploiting available data and conducting thematic studies. Besides, it would be desirable for AAC-DEVA staff to participate in international quality assurance projects."

The Technical Committee showed a strong awareness of the gaps in outcomes from the work of the agency. They referred to the need for wider stakeholder engagement, the need to focus on regional employability of graduates, the need for a different kind of relationship with the universities (including a greater degree of separation) and the need for leadership in driving cultural change in all components of the system.

The Director showed a strong awareness of deficits in the current pattern of activity of the agency. He explained the absence of a strategic plan, the absence of progress on moving to Institutional Evaluation, the absence of a focus on policy evolution and the limited engagement with students

with a general comment on the "lack of time and resources".

Analysis

AAC-DEVA acknowledges in its SWOT and in comments elsewhere in the SAR document that it has not achieved what it aspired to achieve in the five years since the last review. The review panel agrees with this internal assessment and has concluded that the agency needs to review its internal organisational structure, its approach to strategic planning and perhaps, most importantly, its internal culture in order to address its openly acknowledged lack of resources and its utilization of

those resources

The panel recognises and accepts that it is a difficult and protracted exercise to get additional permanent posts assigned to the agency. In those circumstances, AAC-DEVA, with the support of the AAC managing director and the Governing Board should move to seek funding, even if initially on a pilot basis for specific projects to enable the agency to do what it knows is required. AAC-DEVA needs to demonstrate in its output that the added value gained by this approach would benefit the system and then use these achievements to work with the universities to get the required legislative

change.

The review panel also concluded that the organisational structure of the agency hinders its effectiveness. AAC-DEVA needs a well-developed management structure and the current method of filling the academic-coordinator posts does not enable AAC-DEVA to achieve what is required. It is particularly important that AAC-DEVA look for feasible solutions to the difficulties created by lack of continuity in some posts. The creation of a deputy director function may also assist the agency in

dealing with the need for continuity.

Panel commendations:

The review panel commends the professionalism and dedication of the administrative staff during a period of disruption and unplanned changes.

Panel recommendations:

AAC-DEVA should review its organisational structure and its deployment of resources and make what changes are required to provide for consistent strategic planning and implementation and

review of that strategy.

Panel conclusion: Substantially compliant

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ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

2014 review recommendation:

"DEVA should operate its Internal Quality Assurance system in a more formal and documented way in order to ensure that continuous improvement is actually implemented. The results of the different satisfaction surveys should be formally considered. The impact of the improvement initiatives adopted should be assessed in order to ensure that continuous improvement is actually taking place. The panel understands and appreciates the value of lean quality approaches, however, some written records should be found on this improvement process, based on an annual SWOT assessment of the agency's practice. Additionally, the panel recommends the introduction of formal feedback mechanisms addressed to the staff of the Agency."

Evidence

AAC-DEVA acknowledges that it has only partially addressed the recommendation of the 2014 review. In May 2018, it established an Internal Quality Assurance Commission (IQA) to review its own internal quality assurance methodology. The committee is currently reviewing internal documentation and reporting back to the Director and his "management team". In discussions with the Director, the review panel learned that the term "management team" refers to an informal working structure composed of the Director, the legal advisor and the four academic coordinators. At a meeting with AAC-DEVA staff, the purpose of the IQA was described to the review panel as "attempting to simplify processes and do some updating". The staff explained the delayed commencement of the project until mid-2018 (their date) as a consequence of "lack of stability in direction". The work of this group is being conducted by the agency's administrators who are most familiar with procedures. The review panel did not see any terms of reference for this project and its entire focus at the present appears to be on reviewing documentation.

In the SAR, the functions of the IQA are described as "the revision of the internal quality assurance system and the documents that are part of it such as the quality manual, the action plan and its objectives and its adaptation to the strategic plan and the services charter." The Director confirmed at a separate meeting that the agency is now working on creating a strategic plan, specifically for DEVA so it is not clear what "strategic plan" is being used as a reference point for this work. The administrative staff working on this IQA who met the review panel did not mention any strategic plan.

Work has taken place on the 2014 recommendation to make more effective use of feedback from surveys. A report on the issues raised by panel experts is prepared. This is used to inform any updating of guidelines and to assist in the subsequent training of experts.

There is no formal feedback mechanism on the quality of panels. The administrative staff who coordinate the accreditation reports told the ENQA review panel that if they receive informal feedback about the unsatisfactory performance of a panel member they do not document this feedback but do not subsequently use the individual. Experts were asked if they get any feedback on their performance and they had not received any. The secretaries of the panels stated that the universities gave them informal feedback on panel members.

Based on feedback, the agency has developed new coordination mechanisms to ensure greater consistency in reports and it has prepared a guideline for panel chairs and secretaries. The review panel was told by the AAC-DEVA staff and by the quality assurance officers of the universities of a committee of secretaries that now operates to try to ensure greater consistency in all reports going to a single institution. The Director stated that he would like to see the preparation of regional reports on fields of study but that there is neither the time nor resources to do such work at the moment.

Notwithstanding these improvements, the panel were told of issues with reports in their meeting with quality assurance officers of the universities. Issues of consistency were raised though it was acknowledged that there had been improvements in the last two years. They also mentioned more recent examples of what they described as an "unduly negative" tone in the first draft reports associated with the pilot IMPLANTA programme. The university in question raised the matter with the agency and an amended report was issued with a moderated tone, which did not change the original decision. The university felt that this was acceptable as there was more emphasis on recommendations for improvement.

The SAR lists the following documents as part of the internal quality assurance documentation of the agency: the Action Plan, services Charter, Quality Manual, Ethics Code.

The panel did not see formal documentation of annual SWOT analyses of the agency's own performance except for the SWOT contained in the SAR.

The staff of AAC-DEVA do not have a formal system in place for staff evaluation and development.

Analysis

The structural problems mentioned already (e.g. fluctuation at the management level) impede any sustained and effective development of internal quality assurance.

The posts of Director and Coordinators are all filled on a contract basis by staff seconded from the universities whilst the administrative staff of AAC-DEVA in general has permanent posts in the agency. As a consequence, there is 'lack of direction" of internal quality assurance at management level. Gaps in the filling of these senior posts result in gaps in institutional memory and lack of continuous and sustained focus on internal quality assurance. This is most evident in relation to the agency's capacity to review its own performance and to create a long-term development strategy.

The more stable administrative staff is working away at improving the administrative procedures and this is reflected in the greater cohesion in report writing, in the greater consistency of reports, in the consolidated reports prepared for each university and in the internal review of documentation. The panel therefore accepts that a start has been made on addressing one component of an effective internal quality assurance system

However, the panel saw insufficient evidence of a pattern of continuous improvement in the internal quality assurance of AAC-DEVA. There has been a spurt of activity in the last year, associated with the preparation of the SAR but this activity commenced too late to yield meaningful results for this review.

Panel recommendations:

A rigorous and continuous programme of internal quality assurance needs to be embedded in AAC-DEVA and used as an exemplar throughout the system.

Panel conclusion: Substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

Spanish regulations currently in force on official university degree verification and accreditation activities require quality assurance agencies' compliance with the ESG 2015 by means of an external review for full membership by ENQA and the registration in the EQAR (Royal Decree 861/2010, July 2nd).

In order to achieve and maintain such requirement, the AAC-DEVA has undergone two successful external reviews by ENQA. The first one was in 2009 and its respective follow-up report in 2011, and the second one was in 2014, and its follow-up in 2016. This current assessment is the third external review of AAC-DEVA activities. This external review compliance has allowed registration in EQAR since 2009.

Analysis

AAC-DEVA complies with the requirement for cyclical review of the agency. The agency meets the threshold requirement of this standard. However, its pattern of activity suggests that it could more effectively embody in its own activities that which it urges on the universities: a sustained and embedded culture of self-assessment, reflection, and continuous improvement. This is particularly evident in the delayed response to some of the recommendations in the last report. The panel notes the heavy burden placed on the Director and Co-ordinators who were not with AAC-DEVA at the time of the last review. It is important that a formal and well-documented project plan is put in place to deal with whatever recommendations are made by the Board of ENQA at the conclusion of this review and the panel concluded that AAC-DEVA is both willing and able to carry out this project.

It is noteworthy that much of the commentary of this review report echoes what was written in the 2014 report. The panel acknowledges and welcomes the honesty of AAC-DEVA in its admission of lack of progress.

Panel commendations:

The panel commends the reflective quality of the self-assessment carried out by AAC-DEVA.

Panel suggestions for further improvement:

AAC-DEVA may have an influential role in the Andalusian system evolution if the agency itself shows that the requirement for periodic review is just one step in the internal process for quality assurance.

Panel conclusion: Fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Evidence

In its SAR, AAC-DEVA outlines in detail how it has reviewed and aligned its evaluation procedures for institutions with Part 1 ESG 2015. It shows the links in its guidelines to each of the 10 standards in ESG part 1 and provides hyperlinks to all the relevant documentation. The review panel inspected reports to check on this compliance in relation to programme evaluation procedures. It confirmed the following programme evaluation procedures:

- Ex-ante verification of study programmes/Modification of study programmes: general information on the degree, applicable committee and legislation, motivation for each of the proposed criteria, recommendations. AAC-DEVA assures its use by requesting an explanation of how each recommendation has been attended at the next evaluation call.
- Follow-up/monitoring of study programmes: general data on the applicable degree, committee and legislation, and remarks for each of the dimensions. AAC-DEVA assures its use requesting an explanation of how each recommendation has been attended at the next evaluation call.
- Ex-post re-accreditation verification of study programmes: general information on the degree, applicable committee and legislation, compliance with the assessment criteria, motivation.
- Accreditation of Quality Assurance Systems (IMPLANTA): administration information about the centre and programmes. Applicable legislation and committee, compliance with the assessment criteria and justification, opportunities for improvement and strengths (pilot programme in Andalusia and used for one Russian evaluation).
- Institutional accreditation: No evaluations have been carried out.
- Reviews of private universities for recognition: No evaluations have been carried out.
- DOCENTIA: Composition of the assessment committee, context of the institution, overall evaluation, compared data, analysis, main conclusions, recommendations and suggestions for improvement, and good practices implemented by the institution.
- Accreditation of foreign languages skills: applicable committee and legislation, scope of evaluation, compliance with the assessment criteria, motivation and opportunities for improvement.

In respect of each standard in Part 1 of the ESG 2015, the SAR provides the following summary of its application by AAC-DEVA:

"1.1 Policy for quality assurance. The AAC-DEVA applies this criterion to all its evaluation programmes related to official degrees quality (verification, modification, follow-up, and

accreditation renewal), the IQAS implementation at the Andalusian University Centres (IMPLANTA) and teaching staff quality (DOCENTIA) considering it is an essential pillar in quality culture for university institutions.

- 1.2 Design and approval of programmes. The official degree verification programme assesses whether the design complies with ESG 2015. The follow-up programme monitors the implementation of such design. The accreditation renewal programme verifies if the outcomes that result from this implementation are in accordance to the initial design or the modifications that were applied resulting from the monitoring and continuous improvement of the degree. Additionally, IMPLANTA programme establishes that the IQAS has to include a quality procedure for programmes design and approval.
- 1.3 Student-centred learning, teaching and assessment. The design of the official degree must take into consideration aspects such as the skills and competences acquisition, the evaluation systems testing such acquisition and the planning for the degree implementation. Additionally, the available students support and counselling systems are assessed in the verification/modification programme. In the follow-up and accreditation renewal procedures, the implementation process outcomes are analysed. Assessment of this criterion as inadequate may imply an unfavourable decision for degree accreditation renewal. IMPLANTA programme assess the IQAS procedures related to management of the teaching-learning procedures. DOCENTIA programme includes an assessment of teaching methodologies used by teaching staff and in the accreditation of foreign language proficiency; institutions must justify the competency test characteristics, which guarantee language competence acquisition.
- 1.4 Student admission, progression, recognition and certification. These processes are considered at the degree design/modification levels (Verification/Modification), its follow-up and accreditation renewal. IMPLANTA programme requires the existence of procedures to guarantee the quality of these processes. In foreign language accreditation specific criteria are established for these assessments.
- 1.5 Teaching staff. Quality of teaching staff is an essential element for university institutions and therefore all AAC-DEVA evaluation programmes include elements which monitor the institutions concern on their teaching staff competence, how are they assessed and the development of actions for their improvement. The evaluation of this criterion as unfulfilling may imply an unfavourable decision for degree accreditation renewal.
- 1.6 Learning resources and student support. Adequate and enough resources availability is another essential element in AAC-DEVA evaluation programmes. In fact, the evaluation of this criterion as unfulfilling in the accreditation renewal process may imply an unfavourable decision for degree accreditation renewal.
- 1.7 Information management. AAC-DEVA evaluation programmes monitor that institutions have systems for collecting information derived from the official degrees implementation, perform its analysis, and use for improvement. The IQAS procedures must define key indicators and the mechanisms for data collection and its analysis by quality commissions in which teaching staff and students are involved. The development of plans for improvement (compulsory for follow-up and accreditation renewal programmes) is an essential element for the evaluation of this aspect.
- 1.8 Public information. Publicly available information is a dimension assessed in all the programmes. The first follow-up that degrees undergo consists of the assessment of their public information by the student members of the expert panel.

- 1.9 Ongoing monitoring and periodic review of programmes. The continuous follow-up and periodic evaluation of the educational programme must be considered by the IQAS procedures and systematically applied. Feedback of key stakeholders has to be considered by institutions in this process. AAC-DEVA programmes assess this activity performance resulting in the establishment of plans for improvement whose implementation and effectiveness have to be evaluated.
- 1.10 Cyclical external quality assurance. All AAC-DEVA evaluation programmes provide a validity period for the obtained outcome, so that institutions must undergo cyclical external reviews processes."

This AAC-DEVA table maps in detail the correspondence between its criteria and ESG 2015:

Standards and guidelines for internal quality	DEVA-AAC PROGRAMMES						
assurance (Part I)	Verification Modification	Follow-up	Accredita tion Renewal	implant A	DOCENTIA	Accreditatio n of foreign languages skills	
1.1 Policy for quality assurance	9. Internal quality assurance system	Criterion 2. Application of the Quality Assurance System	2. Quality assurance system	·	1. Strategic dimension of teaching assessment	Criterion 7. Revision, improvement and responsible people of the procedure	
1.2 Design and approval of programmes	All criteria	Criterion 3. Degree implementatio n process	Design, organiz ation and	CRITERION 3. Design, follow-up and improvement of educational programmes	2. Methodolog ical dimension of teaching assessment	Criterion 2. Exam characteristic s: contents, structure and evaluation criteria	
1.3 Student-centred learning, teaching and assessment	3. Competences 5. Planning of teaching	Criterion 3. Degree implementatio n process	Learnin g outcom es	CRITERION 6. Management of the teaching- learning processes	2. Methodolog ical dimension of teaching assessment	Criterion 2. Exam characteristic s: contents, structure and evaluation criteria	

1.4 Student admission, progression, recognition and certification	4. Access and admission of students	Criterion 3. Degree implementatio n process	3. Design, organiz ation and develop ment of the educati onal progra mme	CRITERION 6. Management of the teaching- learning processes	Non applicable according to ANECA	Criterion 3. Exams administratio n Criterion 4. Procedure for exam revision Criterion 5. Certificates
1.5 Teaching staff	6. Academic staff	Criterion 4. Teaching staff	4. Teachin g staff	CRITERION 4. Research and teaching staff	1. Strategic dimension of teaching assessment 2. Methodolog ical dimension of teaching assessment 3. Results of the teaching assessment	Criterion 6. Examiners' suitability
1.6 Learning resources and student support	7. Material resources and services	Criterion 5. Facilities, services and resource allocation	5. Infrastr ucture, services and provisio n of resourc es	CRITERION 5. Resources for the students' learning process and support	2. Methodolog ical dimension of teaching assessment	Criterion 3. Exams administratio n Criterion 4. Procedure for exam revision
1.7 Information management	9. Internal quality assurance system	Criterion 2. Application of the Quality Assurance System		CRITERION 2. Quality assurance policy	2. Methodolog ical dimension of teaching assessment	Criterion 1. Characteristi cs of the context Criterion 3. Exams administratio n
1.8 Public information	1. Description of the degree 9. Internal quality assurance system	Criterion 1. Available public information	1. Public informa tion availabl e	CRITERION 1. Public information	1. Strategic dimension of teaching assessment 2. Methodolog ical dimension of teaching assessment	Criterion 1. Characteristi cs of the context Criterion 3. Exams administratio n

1.9 On-going monitoring and periodic review of programmes	9. Internal quality assurance system	Criterion 6. Indicators and results Criterion 7. Improvement plan	7. Satisfac tion and perform ance indicato rs	CRITERION 3. Design, follow-up and improvement of educational programmes	2. Methodolog ical dimension of teaching assessment	Criterion 7. Revision, improvement and responsible people of the procedure
1.10 Cyclical quality assurance	Accreditation renewal every 6/8 years Bachelor degree and Doctorate Programmes and 4 years Master degrees.	8. How the recommendati ons in the verification report and the possible recommendati ons in the modification reports are addressed. Follow-up processes for degrees according to the stage they are in.	and Doctora te Progra mmes	CRITERION 2. Quality assurance policy Certification renewal every 5 years	Certificatio n renewal every 5 years	Criterion 7. Revision, improvement and responsible people of the procedure Certification renewal every 4 years

(*An error in the version of the table in the SAR was brought to the attention of the panel and this amended version is included in this report)

The review panel checked in particular, the operation of the criteria in relation to the foreign language proficiency. There is a specific guide for this programme. For accreditation of foreign-language proficiency, seven criteria are evaluated:

- 1. Characteristics of the context
- 2. Exam characteristics: contents, structure and evaluation criteria
- 3. Exams administration
- 4. Procedure for exam revision
- 5. Certificates
- 6. Examiners' suitability
- 7. Revision, improvement and responsible people of the procedure.

The panel also spoke to one of the experts involved in the evaluation of these foreign language programmes. She confirmed that the panel met in advance to examine criteria and procedures. She confirmed that the panel visited the institution, examined the facilities, reviewed the appropriateness of the training of teachers and reviewed the criteria used for assessment of language proficiency.

The AAC-DEVA coordinator responsible for foreign language assessment explained that AAC-DEVA evaluates the process that universities use to assess the student foreign language level. The Universities define the process of evaluation under the Common European Framework of Reference for Languages (Marco Común Europeo de Referencias para las Lenguas) (MCERL) and AAC-DEVA

evaluates the coherence and application of this assessment process. Four levels of language competence are assessed in the institutions.

The universities told the review panel how they use these reports for the development of their improvement plans. They find the review meetings, which take place at the end of an expert panel visit to be particularly useful. The university rectors stated that AAC-DEVA is acting as a change agent in the system and that its influence has led the universities to take more responsibility for the development of internal quality assurance policies and procedures. AAC-DEVA confirms their use by requesting an explanation of how each recommendation has been addressed at the next evaluation call.

The review panel discussed the mapping of standards with the agency staff, the quality assurance officers of the universities, the Technical Committee and the experts. All agreed that the time and resources of the agency are fully absorbed in programme level evaluations that are well aligned with ESG 2015. The review panel checked the congruence between what was described in the SER and the reports produced by AAC-DEVA and confirmed this congruence.

The agency staff described using feedback from the expert panels and the universities to modify their own procedures and their subsequent training of panels.

All evaluators confirmed that they were given a full briefing on all sections of ESG 2015 before they commenced a review. The Technical Committee confirmed that they reviewed compliance with the European Standards and Guidelines.

Analysis

The review panel found evidence in the SAR and in discussion with AAC-DEVA staff, committee members and evaluators of meticulous attention to compliance with this standard. The need to address the effectiveness of the internal quality assurance processes is emphasised. Such is the level of detail at which this work is carried out that it may be contributing to both the universities' perception of an overly bureaucratic approach and the agency's own difficulties in having enough resources to attend to other necessary dimensions of its function. Universities and AAC-DEVA share a common objective in seeking to progress the move to institutional level evaluations. The review panel realises that this will require a legislative change.

The review panel did find evidence that in the last two years attempts are underway in AAC-DEVA to realign its activity in order to address the problem. A member of the Technical Committee observed that the agency could consider simplifying some of its present activities. The review panel felt there was merit in examining this proposal.

The review panel paid particular attention to the impact on universities of the system of external quality assurance. There was a notable interest among a number of the universities in assuming more responsibility for their own internal quality system and they suggested that they had been influenced in their thinking by their interaction with AAC-DEVA over the previous five years.

The experience of external quality assurance differs to some extent in smaller and larger universities. This is an inevitable result of the availability of proportionate resources. It may be useful for AAC-DEVA to consider if it could further assist the smaller universities so that they can devote more time to implementing recommendations and developing their own internal systems. There may also be

scope for AAC-DEVA to partner with the larger universities on projects focussed on system-level analytics.

Panel suggestions for further improvement:

The review panel suggests that AAC-DEVA continue its practice of seeking to simplify procedures.

Panel conclusion: Fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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.

2014 review recommendation:

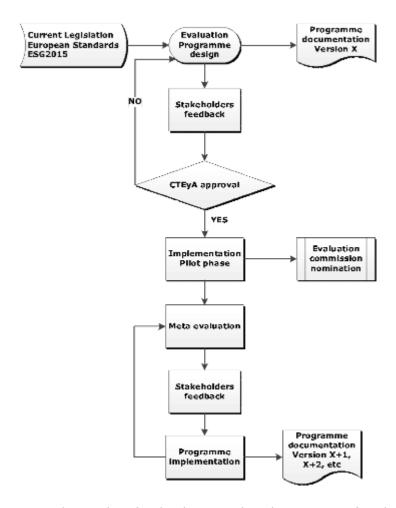
"DEVA should make sure the programme accreditation process and specifically, the new accreditation stage are able to foster real enhancement and contribute to the goals set for the Andalusian region: employability and enhanced institutional accountability.

Concerning the international activities of DEVA, the panel recommends that an international strategy is clearly defined which is consistent with DEVA's mission and available resources."

Evidence

Taking into account the current Spanish regulations and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015), AAC-DEVA designs evaluation programmes and submits them to some stakeholders, principally the universities. Once the universities' opinions are collected and analysed, the programme documentation is issued and approved by the Technical Committee. Before final implementation of the programme, a pilot phase is developed after which a meta-evaluation is performed, supported by those involved in the pilot, to identify the issues for improvement.

The SAR uses the following diagram to illustrate the process of defining and designing quality assurance processes:



General procedure for the design and implementation of evaluation programmes at AAC-DEVA. SER. P.31

Some of the experts who met the panel had been involved in the design and testing of processes. In relation to the most recent process, they described the design of assessment criteria that were then tested for the Ph. D. programmes. After completing the initial development and testing, a pilot implementation took place and the universities were heavily involved in providing feedback. The same experts involved in development were then involved in the induction and training of the expert panel assembled to work on the pilot phase.

University rectors and quality assurance officers told the review panel of their ongoing feedback to AAC-DEVA in relation to what they see as a need to reduce levels of bureaucracy. They suggested that there is still more work to be done in this area and that the bureaucratic burden is particularly onerous on smaller universities. They stated that the impact of this bureaucracy means that smaller institutions do not have enough time to devote to the meaningful implementation of recommendations. They did acknowledge the willingness of AAC-DEVA to work with them on streamlining processes and they also stated that their feedback had already resulted in some improvements.

The universities told the review panel how they use these reports for the development of their improvement plans. AAC-DEVA confirms their use by requesting an explanation of how each recommendation has been addressed at the next evaluation call.

The review panel discussed the mapping of standards with the agency staff, the quality assurance officers of the universities, the Technical Committee and the experts. All agreed that the time and resources of the agency are fully absorbed in programme level evaluations that are very well aligned with ESG 2015.

The agency staff described using feedback from the expert panels and the universities to modify their own procedures and their subsequent training of panels.

A member of the governing body and an entrepreneur at the general stakeholder meeting with a background in research and entrepreneurship suggested that review design needed to pay more attention to evaluating the currency and relevance of curricular content. Both alluded also to the need for greater speed in system responsiveness.

There is evidence of consistent and constant communication with the universities. However, the panel saw little evidence of consultation with students outside the student member of the Technical Committee. The SAR does not document any specific procedures for consultation with a wider group of stakeholders. At the stakeholder meeting, it transpired that there was effectively no substantive agency interaction outside of the universities.

On the other hand, evaluators involved in the development of evaluation processes for PhD programmes spoke of the agency's responsiveness to feedback from institutions and the emphasis on streamlined and consistent procedures.

AAC-DEVA does collect the opinions of its experts on its evaluation instruments and does use this information in modifying and updating its procedures. This was confirmed to the review panel by the experts. The international experts did suggest that greater use could be made of their expertise.

The SAR does not detail how AAC-DEVA gathers opinions on the fitness for purpose of its policies and procedures from stakeholders in the business, professional, civic and social sectors of society. The review panel did not find any evidence of this type of engagement when it met with regional stakeholders.

AAC-DEVA has collaborated with the Russian quality assurance agency, AKKORK, and carried out a number of evaluations in Russia. The review panel checked the documentation to confirm that this activity had been notified to EQAR and noted the responses from EQAR. The panel checked the procedures used for this work and confirmed that they were the same procedures that AAC-DEVA used inside the Andalusian System, adapted to the requirements of the Russian institution(s). The Academic coordinator for this area confirmed that the documents and protocols used were those created by AAC-DEVA for international evaluation. The first evaluations took place in 2016 and in the period between the submission of the SAR and the panel visit, an IMPLANTA type evaluation on the Psychology Faculty at the St Petersburg University was completed. AAC-DEVA considers that the experience gained through this joint international evaluation activity has been very beneficial both to the agency itself and to the panels of Andalusian experts involved in the work.

The SAR contains a table of work undertaken since the last review:

University	Programme level	Program title	Status
Peoples' Friendship University of Russia	Bachelor	Advertising and Public Relations	Evaluated
		Psychology	Evaluated
	Master	Fundamental informatics and information technologies	Evaluated
		Fundamental and applied chemistry	Evaluated
		Plan protection	Evaluated
		Accounting, analysis and audit	Evaluated
		Technologies of Geodesy and Cadastre	Evaluated
		Psychological counselling	2019
Saint Petersburg State University	Bachelor	Psychology	Ongoing
	Master Developmental Psychology		Ongoing
		Educational Psychology	Ongoing

Programme degree evaluations at international level. , p.33

The expert panel used for this work was created in a joint process with AKKORK. A specific training session was organised for the Spanish evaluators carrying out work in Russia in order to familiarise them with the Russian system.

The review panel held one specific meeting with Universities that had experience of the use of the DOCENTIA and IMPLANTA programmes in Andalusia.

The panel learned that the DOCENTIA programme had a history stretching back to 2012 in Andalusia. DOCENTIA had never been implemented across the system because there was no agreement with the trade unions to implement it and this was a prerequisite to its implementation. In the last two years the Ministry has sought the assistance of AAC-DEVA to resolve the difficulties. In 2017 AAC-DEVA called a meeting of all interested parties to see if they could agree on solutions. This did not prove possible. It has been possible for some universities, for example, Cordoba, to implement DOCENTIA on an individual basis. Cordoba has developed its own software for the programme. This is a university-led initiative and the university sought the assistance of AAC-DEVA to review its own activity.

The history of IMPLANTA has a national dimension. Some years ago (before the establishment of the national legal framework for institutional accreditation) ANECA had a program (AUDIT) that was voluntary for the evaluation of IQAS. After the RD 420/2015 and the Resolution of 7 March 2018, AAC-DEVA has defined the IMPLANTA programme based on this regulation.

The IMPLANTA program recognizes the certificates of AUDIT. So, if a university has its IQAS certificate by AUDIT programme (such as the University of Jaen), it can ask AAC-DEVA for recognition of the certificate. So far, only a very limited pilot has taken place in Andalusia with very mixed outcomes and responses. Institutions are however using the framework to look at how their own internal systems of quality assurance are organised.

The SAR brought to the notice of the review panel the high level of appeals of decisions experienced by AAC-DEVA in 2018. This matter was still awaiting resolution when the SAR was submitted but has since been resolved. The narrative around the volume of appeals in 2018 is all concerned with a difference in approach between AAC-DEVA and the universities regarding the requirement for the quality assurance of internships on programmes. The former Ministry representative stated that the student representatives had raised the issue of the quality assurance of internships with it at its annual dialogue. The Technical Committee stated that it fully supported the decision of AAC-DEVA not to approve programmes that did not comply with the quality assurance requirements for the internships.

Analysis

AAC-DEVA has designed quality assurance procedures at a very detailed level for programme evaluations. By its own admission, confirmed by comments from the universities, it now knows that it needs to further simplify its procedures and reduce the onerous bureaucratic burden, particularly for smaller universities. In a system of 11 universities where two of them account for almost 50% of student enrolments, the proportionality of requirements needs to be further examined. The smaller universities, in particular, need structures that will foster greater cohesion in internal quality assurance structures and promote a culture of enhancement. The concern of the 2014 panel that the agency's work was an inadvertent cause of fragmentation of its own and the universities' quality assurance structures remains a concern for this panel.

The history of the IMPLANTA and DOCENTIA programmes show that AAC-DEVA cannot be held responsible for all the delays in the roll-out of these programmes and there is evidence of attempts in the last two years to get some developments under way. AAC-DEVA does need the support of all actors in the system to make progress. It does need to develop a road-map for the system-wide introduction of these programmes and work vigorously to get buy-in from other parties. Five years ago, AAC-DEVA saw the need to move to Institutional Accreditation; it is still signalling this as the **primary** solution to all its problems. The review panel does not concur with this opinion because it is not a change-management process that is entirely within AAC-DEVA's control. AAC-DEVA needs to rigorously change what is within its control- its approach to programme evaluation in order to create time for the agency to do the work it knows is now neglected.

AAC-DEVA has made a start on expanding its international activity. The agency would like to do more. Again, time and human resources were cited as the reason for the limited progress. This will not suffice as a response. AAC-DEVA would like to build wider international partnerships and the Director is supportive of this ambition. AAC-DEVA has identified potential partners and activities in Latin and South America and the review panel supports building these wider relationships. It could

also assist in enlarging the pool of international experts. The staffing structure of the agency and the budget allocation process need to be aligned with this objective.

AAC-DEVA does involve the universities in the design of its quality assurance processes. However, it needs to make greater use of student stakeholders, both the student body of the Andalusian system and the student evaluators recruited from outside the region.

AAC-DEVA has no effective communication with the wider stakeholder body. This creates a very narrow focus in the agency and possibly in the system as a whole. As there is effectively no entity specifically concerned with policy development in AAC-DEVA, there is no channel for external stakeholder involvement at this level.

Panel recommendations:

AAC-DEVA's engagement with stakeholders needs to be reviewed in order to create the same weight of influence and parity of esteem with stakeholders outside the universities.

In particular, the creation of an advisory board for DEVA itself (as distinct from AAC-DEVA) would be of assistance.

Panel suggestion:

The review panel suggests that the international activity of AAC-DEVA get additional focus when AAC-DEVA looks at the deployment of its resources.

Panel conclusion: Substantially 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

2014 review recommendation:

"The current calendar involves an important number of site visits and the panel wonders whether this planning is feasible in terms of delays and resources. The panel noted that universities will be visited several times per year (i.e. University of Seville will receive between 42 and 55 visits in the period 2014-2017) which will certainly impose a heavy burden on the HEIs. An additional challenge associated to this scheme is avoid losing the global view of a given institution and to ensure consistency along the different site visits. DEVA should carefully consider these issues."

Evidence

The SAR provides a table to map compliance with this standard:

Elements for assessment	DEVA-AAC PROGRAMMES					
	Verificati on/Modif ication	Follow- up	Accreditat ion renewal	IMPLANT A	DOCENTIA	Accreditation of foreign languages skills
Self- assessment report	YES	YES	YES	YES	YES	YES
External assessment by a review panel which includes students	YES	YES	YES	YES	YES	YES
Site visit	NO	NO	YES	Only if the initial phase is positive	,	YES
Preliminary report from external assessment	YES	NO	YES	YES	YES	YES
Allegations to the preliminary report	YES	NO	YES	YES	YES	YES
Public final report from external assessment	YES	YES	YES	YES	YES	YES
Complaints and appeals	YES, to the Spanish University Council	NO	YES, to the Spanish University Council	YES, to AAC- DEVA	YES, to AAC- DEVA	YES, to AAC-DEVA
Recommendations included in the final report from external assessment	YES	YES	YES	YES	YES	YES

Elements for assessment included in AAC-DEVA evaluation programmes. SER, p.52

These processes are aligned with the ESG 2015. The processes are fully described in a separate document, "Programmes for Evaluation: Procedures and Functions". AAC-DEVA coordinators review all the elements of this document with all expert panels. The AAC-DEVA administrators and academic coordinators review this document on a regular basis to take account of stakeholder and panel expert feedback.

The review panel checked the documentary record of the quality assurance processes and found a complete and consistent documentary trail including reports and published outcomes.

The panel examined in detail the process used in writing reports. Specific expert panels are selected for the evaluation of each program. Experts have different roles (academic, technical, professional and students.). AAC-DEVA is working for the incorporation of international evaluators when

appropriate through the signing of agreements with international agencies but AAC-DEVA reports difficulty in finding experts fluent in Spanish in the EHEA.

The panel asked students about their involvement in the evaluation process. Students interviewed expressed their satisfaction with the entire process and felt that their voices are listened to in the same way as that of the other experts on the panels.

The experts interviewed were satisfied with the level of support received from the staff of the agency during the evaluation process. There is always a representative of the agency present at every meeting to assist the panel with the formal aspects of reporting.

Before submitting the reports to the interested parties, AAC-DEVA has set up control mechanisms for quality assurance and to guarantee consistency in the results shown in the reports. These mechanisms are based in two committees (Field secretaries committee and Committee for the Issue of reports (CIR)). The first committee is composed of the secretaries of the evaluation committees. This committee reviews all the reports. The second committee membership is the AAC-DEVA Director, the Area coordinator, one member of AAC-DEVA technical staff, and the chair/ coordinator (academic profile) of each committee. This committee approves the reports.

The universities pointed out the improvement found in the reports after the establishment of the two committees mentioned above.

The quality assurance officers of the universities said that they would like to see a reduction in bureaucracy and a simplification of procedures. They feel that current procedures are too onerous and that they distract from a necessary focus on continuous improvement. Some of the officers expressed the view that there are too many steps in the procedures. They also spoke about the deficiencies in the system-level software that is used by the universities to make applications for initial programme verification. This software is not controlled by AAC-DEVA and the officers would like AAC-DEVA to work with the Ministry on its updating, modification and integration. They acknowledged that there have been improvements in the last two years. They feel there is room for further improvement in moving the system away from "permanent control" to a "continuous improvement focus". They would like a stronger "future orientation" in reports. They were very happy with the assistance they receive from AAC-DEVA. When asked about the principal contribution of AAC-DEVA, they stated that AAC-DEVA was very influential in developing a culture of quality assurance in the region.

All evaluators confirmed that they were given a full briefing on all sections of ESG 2015 before they commenced a review. The Technical Committee confirmed that they reviewed compliance with the European Standards and Guidelines.

The agency always gives the institution under review the opportunity to comment on the preliminary report and to present any supporting arguments or to point out what it considers to be any errors of fact in the report. The expert panels consider the responses of institutions and the committee approves the final report.

The evaluation reports (ex ante verification and ex post re-accreditation verification) are sent to the Council of Universities of Spain, which takes the final decision by law.

There have been isolated cases in the verification process in which a negative report was issued by AAC-DEVA and the Council of Universities of Spain did not approve the programme. Institutions affected have an opportunity to appeal to the Council of Universities of Spain. In these cases, the Council of Universities of Spain asked AAC-DEVA about the issues presented by the institutions and

AAC-DEVA reviewed these evaluations and gave an explanation about the assessment of each criterion that was evaluated as negative. The Council then arrives at a final decision.

The review panel had access to the appeals received last year and the responses prepared by AAC-DEVA. The reports, written by AAC-DEVA's experts answering the appeals, were evidence-based and aligned to published criteria. All the cases reported were related to the necessity to have the agreements of internships to assure the practical period to all the students inside the degrees before the authorisation of the programme. The students of the Universities of Andalusia, through their representative in the Technical Committee of AAC-DEVA, informed the agency of the difficulties they encounter in undertaking internships in companies in their degrees. To ensure that all students could complete their internships, AAC-DEVA decided to apply for internships agreements with universities in the ex-ante evaluation of the degrees, but the Andalusian universities did not agree and appealed. This resulted in a decision to allow the universities to meet the requirement before the commencement of the programme and the programmes were then approved.

The agency ensures that all review reports are accessible to the academic community, external collaborators and other stakeholders. The AAC-DEVA evaluation reports are published in open-access on its website. All the reports detailing the formal decisions are available on the official website and are notified to the relevant institutions.

On the Spanish website there is a very useful application for searching the reports related to the different evaluation processes carried out by AAC-DEVA on a specific program (degree, masters or doctorate). On the website in English there are a selection of reports translated to English.

Reports on the international evaluation of foreign institutions, DOCENTIA, IMPLANTA and Accreditation of foreign languages skills are published in the corresponding section on the AAC-DEVA website.

Analysis

The review panel saw the consistent requirement for a self-assessment in the procedures of AAC-DEVA. The quality of the guidelines produced by AAC-DEVA is very high. The guidelines are detailed and they are constantly reviewed to reflect the findings of the users. The guidelines for institutions are based on the learning AAC-DEVA has done itself. Administrative staff and coordinators displayed a strong commitment to ongoing improvement of guidelines. This was supported by the comments of the quality assurance officers of the universities.

The review panel heard similar positive views on the guidelines provided to experts. All categories of experts confirmed that the guidelines were very useful and that at training and meetings in advance of site visits the guidelines were used to ensure that experts understood the procedures, were familiar with the regional context and were informed on the requirements of ESG 2015.

Site visits are a well-established practice. Reports are produced and there is a strong emphasis on producing consistent and reliable reports. This has improved since the introduction of transversal committees. Follow-up procedures are transparent and have clearly defined timelines. In respect of clear guidance for institutional action, there are clear recommendations and progress reports are sought from institutions.

The pre-defined four steps contained in this standard are well embedded in the procedures of AAC-DEVA.

Panel commendations:

The panel commends the high standard of guidelines prepared by AAC-DEVA

Panel conclusion: Fully compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2014 review recommendations:

"The panel welcomes the fact that students are represented in DEVA's government bodies (AAC advisory board and DEVA's Technical Commission). It is also aware of the fact that the Technical Commission is not yet fully functional and encourages DEVA to remain vigilant and ensure that the student representative is really treated as an equal.

Regarding the use of international experts, the panel acknowledges the practical difficulties associated with recruiting and training this kind of experts. However, it considers that additional efforts should be invested to this regard, as introducing international expertise brings in important benefits in terms of introduction of an international perspective, exchange of practices and avoidance of conflict of interest.

With regard to the fitness for purpose of the processes (ESG 2.4), the panel pointed out some issues related to the selection and training of experts. In particular, it referred to the interest of increasing the presence of international experts in the evaluation panels and some potential problems linked to the current methods of selecting student experts."

The panel recommends that the process of selection of student experts is revised. The fact that the student expert selection procedure is completely open could lead to some problems (i.e. students could be pointed out in advanced and be encouraged to apply, which would pervert the selection process). Additionally, the panel considered that the Council of Students could provide some support to the agency in order to improve the selection and training of student experts."

Evidence

AAC-DEVA provided details in its SAR of how it recruits and trains its experts. During the site visit, the review panel had an opportunity to examine the database of experts and to see how it operates. The review panel interviewed a variety of experts across three different sessions. These included national, international and student experts. The review panel also specifically requested a cross-section of reviewers who had conducted different types of evaluations. The review panel asked the AAC-DEVA academic coordinators and administrators to outline how they selected, trained, used and reviewed the performance of experts. University quality assurance professionals were asked for their views on panel effectiveness. The review panel also discussed the effectiveness of expert panels at the meeting with the AAC-DEVA Technical Committee.

The SAR gives extensive details on panel composition and the ongoing efforts to recruit international experts who can carry out their work in Spanish. This continues to be a challenge for the agency and AAC-DEVA is now attempting to find additional experts in Latin and South America. Evaluators related to activities under ESG 2015 are classified into four possible types: academic, technical, professional and students. Their independence is guaranteed, as they are not part of the Andalusian University System. AAC-DEVA signs agreements with international agencies for the incorporation of international evaluators when appropriate.

Candidates for the evaluation commissions are selected from the database in accordance with their profile and the evaluation programme for which they may be required. The appointment of the evaluators is conducted, at the request of the academic coordinator, by AAC-DEVA's Director. After confirming their participation, evaluators formally accept their appointment, which entails accepting the AAC-DEVA code of ethics, ensuring, among other things, the confidentiality of the documentation supplied by the applicants (person/entity) and the results of the evaluation. Specific expert panels are selected from the evaluation commissions of each programme to assess each degree. To be appointed as a member of an expert panel it is necessary to attend a training day.

The institutions may request the recusal of one or more members of the expert panel but must offer justification for this type of request. The area coordinator, AAC-DEVA staff and evaluators assess the work of the commission members. This assessment is used for the commission renewal, which takes place every three years. As a matter of preference, rather than all the members being replaced simultaneously, renewal takes place in a staggered manner. The appointment of the evaluation commissions necessary for every programme is made in accordance with the provisions included in the AAC-DEVA document, "Programmes for Evaluation: Procedures and Functions".

The procedures for the selection of student evaluations have been modified and strengthened. In 2015, AAC-DEVA issues a formal request to Student Associations to participate in the process. The procedures were codified in the document, "Selection and Appointment of Evaluators". A meeting was held with student associations in 2016 in order to get their feedback on how to improve the processes. The Technical Committee approved this document in 2016. Student evaluators in Andalusia are selected from outside the region.

Specific training for students who were due to participate in ex-ante- verification, follow-up and accreditation renewal took place in December 2017. In the opinion of students-evaluators it allowed them to gather adequate knowledge and skills to participate in the above-mentioned procedures.

At the review panel's meeting with student evaluators, they described being treated in exactly the same way as other expert members and being allocated roles within panels, which were no different to other members. They confirmed that they took part in the preparatory sessions for the institutional visits. They received all the necessary manuals and guidelines in advance. Student evaluators noted a much more positive acceptance of their role now than four years ago by university staff. The student member of The Technical Committee expressed the same opinions. The student panel members confirmed that a consensual approach was taken to decision-making and that their opinions were always considered.

The review panel also asked the other evaluators they met about the role of students on the panels. They confirmed that student evaluators were treated in exactly the same way as other panel members and they commented on the thoroughness and professionalism with which the students did their work. One expert commented ruefully that the only problem was that they "inevitably ceased to be students".

The experts described the training they received in advance of working on all types of reviews. There is an annual training session for all new national experts involved in modification and verification reviews. In the case of international reviewers this was done on-line though when possible they also attended training in Cordoba. Experienced experts were used as part of the training programme in order to give new reviewers an opportunity to learn from the first-hand experience of others. Staff from AAC-DEVA were also involved in the training.

The international evaluators described a more varied experience of induction and interaction with the agency but all those interviewed by the panel confirmed that they were given an introduction to the Andalusian and Spanish Higher Education system.

The database of experts is used to select members of evaluation panels. The staff of AAC-DEVA and the coordinators all agree that more work is required to enhance the usability of the database. The review panel also established that the database does not have any record of the formal evaluation of a panel's performance.

The composition of the present database shows that only 6% are classified as professional evaluators.

Analysis

Considerable work has taken place to improve the selection and utilization of experts since the last panel visit. The agency has developed good documentation for experts, has improved its database management and has developed more consistent induction and training. It has made improvements in the recruitment and utilization of international experts and this appears to have accelerated in the last two years. The evaluators to whom the panel spoke confirmed that they had received guidelines in advance, had been briefed on the Andalusian higher-education system and that a mechanism existed for them to provide feedback to the agency.

The review panel acknowledges the work that has been done on the database and AAC-DEVA's own awareness that its usability by the academic coordinators requires further development. Improving accessibility and functionality for the academic coordinators will streamline work procedures.

There has been a marked improvement in the agency's selection, utilization and integration of student evaluators. There remains scope for the fuller use of students on the agency's committees and the review panel supports the Director's proposal that AAC-DEVA establish its own more formal communication links with the students in the system.

AAC-DEVA has also made efforts to improve its pool of international evaluators. The review panel understands the requirement that experts be able to work in Spanish and acknowledges the language constraints. The review panel thinks that there should be greater integration of the international experts into the review process as some feel they are operating at a remove from the process. The AAC-DEVA proposal to build partnerships in Latin America may improve the number of eligible experts working with the agency and this would be a positive development.

Universities express the view that not all panel members were as familiar as they needed to be with the Andalusian system. This was balanced by the comments from the Technical Committee that they were familiar with the different "vagaries and peculiarities" of the different institutions and that their work helped in coping with this understandable feature of an autonomous system. The panel

sees the work of the Technical Committee as an important internal check on the quality of expert panels and it is important that it operates is a regular manner.

Panel suggestions for further improvement:

AAC-DEVA could consider strengthening its efforts to recruit more international experts and develop procedures for the more effective utilization of their expertise.

AAC-DEVA might consider recruiting a larger cohort of evaluators with a professional background outside of Higher Education.

Panel conclusion: Fully compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

AAC-DEVA has published a guide for each programme in which the criteria used for assessment are explicitly stated. In its training sessions for evaluators it stresses the need for a systematic and consistent application of the criteria. For homogenisation, all preliminary reports are revised by specific committees of each programme formed by members of the evaluation committees. Once revised, reports are approved by a committee for the issue of reports of each programme formed by the AAC-DEVA's Director, the Area coordinator, one AAC-DEVA technical staff, and the chair/coordinator (academic profile) of each committee.

For verification/modification programme, ten criteria are evaluated:

- 1. Description of the qualification
- 2. Rationale
- 3. Competences
- 4. Access and admission of students
- 5. Planning of the qualification
- 6. Teaching staff
- 7. Material resources and services
- 8. Results envisaged
- 9. Internal quality assurance system
- 10. Implementation calendar.

Each aspect is evaluated by the expert panel as Insufficient, Sufficient but improvable, Satisfactory or Not applicable using the provided questionnaire.

For degrees accreditation renewal, criteria for assessment are:

- 1. Public information available.
- 2. Quality assurance system.

- 3. Design, organisation and development of the educational programme.
- 4. Teaching staff.
- 5. Infrastructure, services and provision of resources.
- 6. Learning outcomes.
- 7. Satisfaction and performance indicators.

The expert panel evaluate each aspect in one of the following levels: passed with excellence, passed, partially passed or not passed using the criteria provided in the specific guides.

For IMPLANTA programme, six criteria are assessed:

- 1. Public information
- 2. Quality assurance policy
- 3. Design, follow-up and improvement of educational programmes
- 4. Teaching and research staff
- 5. Resources for the student support and learning process
- 6. Management of the teaching-learning processes

For DOCENTIA programme, three criteria are assessed:

- 1. Strategic dimension of teaching assessment
- 2. Methodological dimension of teaching assessment
- 3. Results of the teaching assessment

Institutional accreditation takes into account accreditation renewal and IMPLANTA criteria.

For Accreditation of foreign-language proficiency, seven criteria are evaluated:

- 1. Characteristics of the context
- 2. Exam characteristics: contents, structure and evaluation criteria
- 3. Exams administration
- 4. Procedure for exam revision
- 5. Certificates
- 6. Examiners' suitability
- 7. Revision, improvement and responsible people of the procedure

The people involved in writing the initial report handle alterations or modifications of the preliminary reports, requested by institutions. This is essentially a process of clarification. If an institution raises a matter concerned with accuracy, completeness or tone, it would be addressed here. The final report that contains the favourable or unfavourable decision is also approved by the committee for the issue of reports and is sent to the University Council, the responsible body of the final decision.

AAC-DEVA now uses transversal committees to review all reports from an institution in order to moderate outcomes and ensure consistency. The AAC-DEVA committee of secretaries and chairs works across reports from a number of institutions to improve consistency and transparency.

The Technical Committee members outlined how they approach their work to the review panel. They begin by examining the criteria, then the guidelines and then the procedures. They stressed that their aim is to achieve consistency and transparency. In response to questions from the Chair of the review panel, they explained how they check for alignment with ESG 2015. In the case of applications for programme renewals, they check that the reports contain detail of student surveys and they also focus on the role of students in internal quality assurance and on the expert panels.

This was confirmed by the student experts in a separate meeting. The students stated that the impact and influence of students on internal quality assurance had improved over the previous five years as a direct consequence of the approach adopted by AAC-DEVA.

Analysis

Published criteria are available for all assessment processes and are applied consistently. Both the university rectors and the quality assurance officers highlighted the improvement in the quality of published guides. In addition, the experts interviewed by the review panel emphasised the thoroughness and care with which criteria were explained to all panel members. Experts were also asked to focus on the consistent application of criteria.

The quality assurance officers of the universities confirmed that they too receive full briefings on all criteria and that they are afforded an opportunity at development stage to contribute to the definition, development and clarification of all criteria.

The review panel noted the emphasis on having explicit and published criteria in the comments made by the Technical Committee. The members of that committee emphasised their role in ensuring that external quality assurance operated in an equitable and reliable manner.

The review panel was impressed by the constant focus of administrative staff and academic coordinators on developing, reviewing and publishing criteria that are applied consistently. The published criteria have a strong focus on the absolute necessity for an evidence-based approach. Transversal scrutiny has become an embedded part of its procedures and this has proved a valuable learning tool for the agency itself. In addition, it is now assisting the institutions by providing a more holistic view of each institution. This is now beginning to influence how each institution develops its own quality assurance culture and structure. The review panel concluded that there was sustained evidence of enhancement in the improvements implemented in this area.

Panel commendations:

The review panel commends the emphasis on consistency in the reports produced by AAC-DEVA.

Panel Conclusion: Fully compliant

ESG 2.6 REPORTING

Standard:

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

Evidence

The AAC-DEVA evaluation reports are published in open-access format on its official website. All institutions receive full copies of reports. The official degrees verification, modification, follow-up and accreditation renewal reports are available in Spanish and a selection of reports is translated to English. In the case of DOCENTIA, IMPLANTA and Accreditation of Foreign Language Proficiency, the reports are published on the websites of the respective programmes.

For verification programmes, the AAC-DEVA publishes only positive final reports. The agency considers that is not necessary to publish information about degree projects that have not been implemented. For the rest of the degree evaluation programmes, both positive and negative outcomes are published. No Institutional evaluations reports have been published yet as no institutional evaluations have taken place. During the development of the self-assessment report AAC-DEVA discovered that the accreditation of foreign languages proficiency evaluation reports were not published and only the formal outcome was published. This situation has already been corrected.

The review panel reviewed reports and can confirm that the reports use a strong evidence-base. They provide a context for the report that explains the Higher Education system in Andalusia and the key information about the institution. The reports contain a list of recommendations. There was not always a consistent approach to the highlighting of good practice.

The Quality Assurance Officers of the Universities confirmed that they were given an opportunity to comment on the accuracy of the reports while they were in draft form. They suggested that an unduly negative tone was used in some reports and that they would welcome more emphasis on the positive findings. The University Rectors confirmed that they too had no difficulty in raising matters of accuracy with AAC-DEVA. They also described the advice they received informally from the DEVA Director in the recent past as very useful.

The review panel did not find any evidence of the reports being brought to the attention of the wider civil, social and business community beyond their publication on the website.

At its meeting with stakeholders who were not university rectors or quality assurance professionals the panel checked to see if they were familiar with the reports and did not find any awareness of their existence. The entrepreneur who is a new member of the governing body remarked on the extent to which the Higher Education system in the region was detached from wider society.

The former ministry official told the panel that the student representatives in their annual meeting with the ministry had raised concerns about the quality of internships and the oversight of this element by AAC-DEVA. The panel notes that the issue of internships was addressed in verification reports and that this gave rise to an unusually large volume of appeals.

Analysis

AAC-DEVA publishes full reports and the universities are very familiar with the reports. The Students representative body is also familiar with the reports and the presence of this material on the web site.

The review panel concluded from its examination of reports that a greater focus could be placed on using a positive tone in a consistent manner and being more specific in pointing out innovative/transferable good practices.

The panel sees scope for improvement in the agency's interaction with wider society.

Panel suggestions for further improvement:

In addition to publishing reports on its official web site, AAC-DEVA might consider how best to communicate its work to a wider audience.

AAC-DEVA could view its reports through the lens of enhancement in order to ensure a stronger focus on a positive tone and specific recommendations for enhancement.

Panel conclusion: Fully 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.

Evidence

The appeals' procedures for AAC-DEVA evaluation programmes are provided in the document, "Resolution of Complaints and Appeals" and this document is available on the agency website. These procedures are notified to the institutions during the development of new evaluation programmes.

As part of the Spanish regulatory system, the final resolution on the procedures for verification, modification and accreditation renewal is performed at University Council level and this body manages and resolves the appeals received. This is a national body and has jurisdiction over the entire Spanish system. It may request an AAC-DEVA report to assist its deliberations.

In discussion with the agency staff and Director, the panel learned that an institution can seek to have errors of fact in the first draft remedied. Institutions have also referred reports back for clarification. In the case of the recent IMPLANTA pilot, an Institution that got an unfavourable outcome referred a document back because of what it described as a "harshly negative tone". The tone of the report was modified but the original decision was not changed. The institution was satisfied with this outcome.

The number of claims and appeals received has been usually very low. However, the number of appeals to the final reports of the last verification call has increased. In their appeals, Universities have questioned how AAC-DEVA applies some criteria established in this programme. The panel sough additional information on the increase in the number of appeals in 2018. All of these appeals arose from the same issue concerning the lack of confirmation on internships in the programme documentation. The Technical Committee supported the decision of the expert panels. The student member of the Technical Committee emphasised the importance of the quality assurance of internships and the other members of the committee supported his view. AAC-DEVA raised the matter with ANECA and REACU, in order to establish if a similar problem was occurring in other regions. The Universities appealed the decisions to the University Council which modified the original decision by allowing the universities to implant degrees before signing internship agreements.

AAC-DEVA has mechanisms by which complaints and suggestions about AAC-DEVA activities can be made in a limited manner. The SAR states, "any individual or institution can use the online contact form or communicate via email to deva.aac@juntadeandalucia.es. The AAC-DEVA states that it is committed to answering all these communications."

The panel checked with staff and the director on the existence of a formal complaints' procedure and could find no evidence of such a procedure. In conversation with staff and the Director, they stated that it was always possible to make a phone-call to the agency about any issue.

Members of staff were asked how they would raise complaints and they also said that it would be done informally.

Analysis

AAC-DEVA has a well-developed system that deals with appeals. This system is well understood by the universities and operates efficiently and effectively. AAC-DEVA follows well-defined procedures in the operation of this system and the institutions accept its outcomes.

A process of formal appeal is available and the appeal body is a national one. The panel saw evidence of its operation in 2018 in relation to the unprecedented number of appeals arising from the requirement in respect of student internship programmes. The process worked effectively.

The panel could find no evidence of the existence of any formal complaints' procedure. From discussion with various groups, it became apparent that complaints are handled informally. This is a gap in the quality assurance procedures.

Panel recommendations:

AAC-DEVA needs to develop a specific procedure to deal with complaints.

Panel conclusion: Substantially compliant

2014 REVIEW PANEL CONCLUSIONS -A 2019 REVIEW PANEL COMMENTARY ON PROGRESS

The 2014 review panel, in its conclusions and recommendations, called attention to the context in which AAC-DEVA operates. In particular, it noted the legal and regulatory requirements placed on the agency in respect of programme accreditation. These requirements have not changed in the last five years. The agency and the universities are all in agreement that this system, as it currently operates, creates a huge administrative burden. Whilst continuing to advocate change in the regulatory environment, it would be advisable for AAC-DEVA to more proactively seek to modify and simplify its procedures. This is a change, which is within the control of AAC-DEVA.

The independence of AAC-DEVA, which the 2014 panel described as "limited" continues to be limited to the extent that is required to conduct programme level evaluations. However, the legal framework of the agency was modified in 2018 in order to confirm the independence of the agency in its structure and operation.

The complete ex-ante accreditation/follow-up/ex-post accreditation had not been fully implemented in 2014. This has now been completed and has accounted for the bulk of the activity of the agency. The 2014 panel observed that verification and follow-up processes had developed into a "significantly bureaucratic and control-based exercise". Whilst there have been some modifications, the consensus from the universities is that the process is essentially unchanged in character. The Technical Committee also commented on the need for the system to develop a much stronger enhancement focus. The review panel concurs with this opinion. It is essential that AAC-DEVA works to change the current processes so that there is real evidence of change at the time of the next

review. The 2014 panel emphasised the need for AAC-DEVA to "foster real enhancement" (sic). This review panel re-states that exhortation.

The 2014 review panel stated that AAC-DEVA should contribute to the achievement of the Andalusian goals for the region: "employability and enhanced institutional accountability". Both of these goals are still significant regional priorities and it would be constructive to see AAC-DEVA create policies that can measurably address these goals.

The 2014 panel suggested that AAC-DEVA should give more attention to creating a "global view of a given institution". AAC-DEVA has made important progress on this recommendation by addressing the consistency of its reports going to the one institution. The universities find these reports useful and they suggest that the procedure has increased the consistency of all reports. The Director's suggestion that this process be extended to a field of study ("for example, engineering") for the region is a very good one and would certainly help the system and the region.

In 2014 the panel wrote:

"The panel encourages DEVA to reflect on the way the selection of experts is done and the registers of DEVA's expert database are updated so as to capitalize on its full potential."

AAC-DEVA has done a lot of work on improving its database of national experts. By its own admission, it needs to do more work on recruiting international experts. The presence of representatives from business, enterprise, the professions and civil society on the database could be increased as it presently stands at 6%. AAC-DEVA could also consider if it is making optimal use of its international experts. The selection and integration of students has improved since 2014.

In 2014, the panel commented that the Technical Committee was not "fully functional". In April 2019, the Technical Committee had not met since the previous November. The panel was very impressed with the expertise, insight and commitment of the members of the Technical Committee whom it met. AAC-DEVA should consider if it is making optimal use of this committee.

The 2014 panel suggested that there was a need for more system-wide analysis. This panel repeats this recommendation.

In respect of internal quality assurance, the 2014 panel felt that there was a lack of formality in internal procedures. This remains the case. As in 2014, there is additional work required to address the approach to internal quality assurance. The Internal Quality Assurance Commission (IQA), established in 2018, is at the moment reviewing internal documentation. This is a necessary but insufficient response to the 2014 recommendation.

In 2014, the panel wrote:

"Concerning the international activities of AAC-DEVA, the panel recommends that an international strategy is clearly defined which is consistent with AAC-DEVA's mission and available resources"

The AAC-DEVA SAR concludes that there has been some progress on this recommendation. The review panel considers that there has been some activity and development of international activity. This is an area that will require additional strategic focus, the development of goals and the allocation of resources. The review panel notes the desire of the Director of DEVA to make further progress on this 2014 recommendation.

In its concluding paragraph, the 2014 panel again reiterated its wish that AAC-DEVA "uses its influence to make the system more coherent and holistic in its totality, and less detail-oriented".

This panel did not see sufficient evidence of a structured approach by AAC-DEVA towards inculcating change in the system. This is regrettable because AAC-DEVA knows what is required.

As this is a third review, the review panel paid particular attention to seeking evidence of continuous improvement and enhancement. AAC-DEVA does display a commendable focus on doing things better. The staff is enthusiastic, motivated, committed and capable of self-reflection. The changes in personnel have caused some difficulties but the review panel saw evidence of positive change in the last two years and is impressed by the willingness of management and staff to address any outstanding problems. The institutions are well served by the meticulous work of AAC-DEVA and a renewed system level collaboration should yield dividends for the quality assurance of Higher Education in the region.

CONCLUSION

SUMMARY OF COMMENDATIONS

The review panel commends the professionalism and dedication of the administrative staff during a period of disruption and unplanned changes. (General and ESG 3.5)

The panel commends the reflective quality of the self-assessment carried out by AAC-DEVA. ESG 3.7)

The panel commends the high standard of guidelines prepared by AAC-DEVA (ESG 2.3)

The review panel commends the emphasis on consistency in the reports produced by AAC-DEVA. (ESG 2.5)

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

A list of judgements and recommendations in relation to each ESG standard:

ESG 3.1: Partially compliant

Panel recommendations:

As a matter of urgency, DEVA should complete its own Strategic Plan.

AAC-DEVA should conduct a review of its organisational structure with a specific focus on the DEVA structure. External expertise should inform this exercise.

AAC-DEVA should begin the process of much wider stakeholder engagement.

ESG 3.2: Fully compliant

ESG 3.3: Fully compliant

ESG 3.4: Substantially compliant

Panel recommendations:

The review panel suggests that immediate steps be taken to start a programme of thematic analysis through the use of project funding and in association with the universities of the system.

The review panel would like to see a thematic analysis of reports conducted and published. Such a thematic approach should *inter alia* address regional priorities.

ESG 3.5: Substantially compliant

Panel recommendation:

AAC-DEVA should review its organisational structure and its deployment of resources and make what changes are required to provide for consistent strategic planning and implementation and review of that strategy.

ESG 3.6 Substantially compliant

Panel recommendation:

A rigorous and continuous programme of internal quality assurance needs to be embedded in AAC-DEVA and used as an exemplar throughout the system

ESG 3.7: Fully compliant

ESG 2.1 Fully compliant

ESG 2.2: Substantially compliant

Panel recommendations:

AAC-DEVA's engagement with stakeholders needs to be reviewed in order to create the same weight of influence and parity of esteem with stakeholders outside the universities.

In particular, the creation of an advisory board for DEVA itself (as distinct from AAC-DEVA) would be of assistance.

ESG 2.3: Fully compliant

ESG 2.4: Fully compliant

ESG 2.5: Fully compliant

ESG 2.6: Fully compliant

ESG 2.7 Substantially compliant

Panel recommendations

AAC-DEVA needs to develop a specific procedure to deal with complaints.

This list of specific commendations and recommendations should be considered in conjunction with the holistic recommendations and strengths contained in the review summary at the beginning of this document.

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



ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

TIMING	ТОРІС	PERSONS FOR INTERVIEW
Day 1, 16.00-18.00	Review panel's kick-off meeting and preparations for day I	
60 minutes	A pre-visit meeting with the agency contact person to clarify elements related to the overall system and context	Belén Floriano Pardal , responsible for the area of international relations
Day 2, 9.00-10.15	Meeting with AAC President, AAC Managing Director and DEVA Director	Pilar Ariza Moreno, General Secretary of Universities, Research, and Technology Rosa María Ríos Sánchez, Managing Director of AAC, Francisco Gracia Navarro, Director of DEVA, Manuel Torrablo Rodriguez, Former General Secretary of Universities, Research, and Technology
15 minutes	Discussion among panel members	
45 minutes	Meeting with the team responsible for preparation of the SAR	Belén Floriano Pardal , responsible for the area of international relations
		Juan Carlos Fernández Luque, area of international relations
		José Gutierrez Pérez, responsible for the area of University Evaluation and Accreditation
15 minutes	Discussion among panel members	
45 minutes	Meeting with members of Governing Board	Isaac Túnez Fiñana, General Secretary of Research, Development and Innovation/Regional Ministry of Health
		Jerónimo José Pérez Parra, President of the Andalusian Institute of Agricultural, Fishing, Food and Ecological Production Research and Training
		Antonia Lorenzo López, CEO of Bioazul SL
		Asunción Fernández Camacho, Research Professor at the Institute of Materials Science (Consejo Superior de Investigaciones Científicas)
15 minutes	Discussion among panel members	
45 minutes	Meeting with Key function Managers	María Pérez García, Head of Service
		Seferina Palacios García, Financial issues
		Luis Manuel Muñoz Rodríguez, General IT
45 minutes	Lunch	
60 minutes	Meeting with 5 coordinators of: - University Evaluation and Accreditation	José Gutierrez Pérez, responsible for the Area of University Evaluation and Accreditation
	- R&D&I Evaluation and Accreditation - Teaching Staff Evaluation and Accreditation	Soledad Rubio Bravo, Responsible for the Area of Research, Development and Innovation(R&D&I) Evaluation and Accreditation
	- Institutional Accreditation	Isabel Burón Romero, Responsible for the Area of
	- International Relations	Teaching Staff Evaluation and Accreditation Belén Floriano Pardal, Responsible for the Area of International Relations
15 minutes	Discussion among panel members	
60 minutes	Meeting with Technical Committee for Evaluation and Accreditation (renewed in Dec, 2018), 2 members who have been re-appointed, the student member and one new appointee.	Eduardo García Jiménez, Humanities Area, University of Seville Teresa Bajo Molina, Legal and Social Sciences Area,

		University of Granada
		Mª del Mar Malagón Poyato, Biology and
		Biotechnology Area, University of Córdoba Pablo Quesada Martín , Student at the Pablo de
		Olavide University ,as representative of the Student Advisory Council
15 minutes	Discussion among panel members	
	Meeting with student evaluators on DEVA panels, Andalusian students nominated as evaluators to	Begoña Galián Nicolás, University of Murcia/Bachelor and Master Accreditation
	other agencies	Jaume Hombrado Trenado , University of Barcelona/Bachelor and Master Accreditation
		Juan Pablo Rojas Bustamente , University of Salamanca/Verification
		Irene Moreno Medina , University Autonomous of Madrid/Verification
		Ana Mirman, University of Seville
30 minutes	Review panel private meeting	
Day 3, 8.30- 9.00	Review panel private meeting	
45 minutes	Meeting with DEVA staff	Samaly Santa Cardona, Area of Research, Development and Innovation (R&D&I) Evaluation and Accreditation
		J. Rafael Maroto Escobar , Area of Teaching Staff Evaluation and Accreditation
		Esther Megía Serrano , Area of University Evaluation and Accreditation
		Pilar Romero Godoy , Area of University Evaluation and Accreditation
		Alfonso J. Lopez Baena , Area of University Evaluation and Accreditation
		Juan Carlos Fernández Luque , Area of International Relations
15 minutes	Discussion among panel members	
75 minutes	Meeting with heads of reviewed HEIs	Mª Soledad Cardenas Aranzana, University of Córdoba
		Dorothy Kelly, University of Granada
		José Ignacio García Pérez , Andalusian International University
		Gabriel Pérez Alcalá, University Loyola Andalusia
		Concepción Fernández lorenzo, University of Cádiz
		Juan Antonio Márquez Domínguez , University of Huelva
		Yolanda García Calvente, University of Málaga
		Vicente C. Guzmán Fluja, University Pablo de Olavide Cristina Yanes Cabrera, University of Sevilla
15 minutes	Discussion among panel members	
45 minutes	Meeting with QA Officers from HEIs	Mª Teresa Pozo Llorente, Head of the Quality
		Unit/University of Granada José Manuel Doblas Viso, Head of Quality
		Unit/University of Granada
		Unit/University of Granada José Manuel Doblas Viso, Head of Quality Area/University of Málaga Raúl Giráldez Rojo, Rector's Delegate for Quality
		Unit/University of Granada José Manuel Doblas Viso, Head of Quality Area/University of Málaga Raúl Giráldez Rojo, Rector's Delegate for Quality Assurance/ Pablo de Olavide University María de los Santos Bruzón Gallego, Quality
		Unit/University of Granada José Manuel Doblas Viso, Head of Quality Area/University of Málaga Raúl Giráldez Rojo, Rector's Delegate for Quality Assurance/ Pablo de Olavide University María de los Santos Bruzón Gallego, Quality Manager/ University of Cádiz Sergio Pérez Cuadrado, Head of Service, QA unit/

45 minutes	Meeting with HEIs that have implemented Docentia and Implanta programmes	Mª Teresa Pozo Llorente, Head of the Quality Unit/University of Granada
		Jacinto Fernández Lombardo, Head of the Planification and Evaluation Area/ University of Jaen/Implanta
		Juan Ramón Lama Ruiz, Secretariat Director of Monitoring and Accreditation /University of Seville/Implanta
		Rafael Infantes Lubián , Head of the Quality Service of the UCO/University of Córdoba/Docentia
45 minutes	Lunch	
90 minutes	Meeting with representatives from the reviewers' pool	Luis Pejenaute Rodríguez, Accreditation - University Pompeu Fabra
		Emilio Manuel Fernández Suárez, Accreditation - University of Vigo
		Jesús Félez Mindán , Verification - Polytechnic University of Madrid
		Mª del Carmen García Galera, Implanta - University Rey Juan Carlos
		Elena Pérez Zabaleta , Implanta - University of Valladolid
		Concha Serrano Alcaide, Docentia - Foundation Madrid+d
		Maria José González López, Verification - Cantabria University
		Laura Riera I Grau, Universidad Autónoma de Barcelona- Language Service
		Jesús López Romalde, Verification & Follow-up - University of Santiago de Compostela
15 minutes	Discussion among panel members	
45 minutes	Meeting with International evaluators from the reviewers' pool	Sandra Sandoval, Los Lagos University (Chile) José Alberto Cardoso Pereira, Polytechnic Institute of Bragança (Portugal)
		Anca Prisacariu, Quality Assurance Professional (Romania)
		Juan Martínez, National Institute of Applied Sciences of Lyon (France)
15 minutes	Discussion among panel members	
45 minutes	Stakeholder group	Librado Carrasco Otero, President of FUNDECOR and General Coordinator of Transfer and Empleability
		Rafael Linares Burgos, Managing Director/ FUNDECOR
		David Naranjo Gil , Executive Vice President of Foundations/UPO
		Pedro González-Velasco Calderón, General Coordinator of Foundations/UPO
		Manuel García Molina, General Secretary of Andalusian Young Entrepreneur (AJE Andalucía)
		Agustina María Herruzo Peralbo , Student Orientation University of Córdoba
30 minutes	Review panel private meeting	
Day 4, 8.30- 9.30	Morning meeting among panel members to agree on final lines of enquiry	
30 minutes	Meeting with CEO to clarify any pending issues	Francisco Gracia Navarro, DEVA's Director
30 minutes	Review panel private meeting	
30 minutes	Final meeting with CEO, senior management and self-assessment group to inform about preliminary findings	Francisco Gracia Navarro, DEVA's Director María Pérez García, DEVA Chief of Service, and legal advisor
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		José Gutierrez Pérez , Responsible for the Area of University Evaluation and Accreditation
		Soledad Rubio Bravo , Responsible for the Area of Research, Development and Innovation(R&D&I) Evaluation and Accreditation
		Isabel Burón Romero , Responsible for the Area of Teaching Staff Evaluation and Accreditation
		Belén Floriano Pardal , Responsible for the Area of International Relations
45 minutes	Lunch and final panel discussion	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Andalusian Agency of Knowledge, Department of Evaluation and Accreditation (AAC-DEVA) by the European Association for Quality Assurance in Higher Education (ENQA)

October 2018

1. Background and Context

The Agency for Quality Assurance in Higher Education and Research of Andalusia (AAC-DEVA) is an administrative autonomous organism from the Regional Ministry of Knowledge, Research and University (Government of Andalusia).

The National Organic University Law 6/2001, December 21st (Title V) and the Regional Andalusian University Law established the legislative and legal framework for the activities that AAC-DEVA may carry out. The objective of AAC-DEVA is to conduct the assessment, accreditation and certification of quality, within the terms of reference, of the universities and Higher Education institutions in Andalusia. In doing so, the Agency promotes and guarantees the quality of the Andalusian Knowledge System bearing in mind its adequacy to the social demands and to the European Higher Education Area.

Since its foundation in 2005, the Agency has become the main instrument to promote and evaluate the quality of the Andalusian Higher Education and Research System. Within its activities, AAC-DEVA performs the ex-ante verification of study programmes, the follow-up of their implementation and their ex-post re-accreditation verification of Andalusian Higher Education institutions. Moreover, AAC-DEVA has recently implemented new Programmes for Institutional accreditation and accreditation of Quality Assurance Systems of Higher Education institutions. In addition, AAC-DEVA covers the teaching staff accreditation and evaluates the quality of teaching, research and management activities of teaching staff members from Public Universities -permanent and/or under long-term contracts. These evaluations are part of a process used to to assign additional salary supplements based on productivity. Finally, evaluation of proposals for research grants is coordinated with the participation of expert panels from outside Andalusia.

AAC-DEVA has been an ENQA member since 2000 and is applying for renewal of its membership.

AAC-DEVA has been registered on EQAR since 2014 and is applying for renewal of registration.

2. Purpose and Scope of the Evaluation

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

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of AAC-DEVA within the scope of the ESG

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

Although DEVA-AAC operates a wide range of quality assurance processes related to Higher Education, teaching staff, and research and development, the main activities correlated to the scope of the ESG are:

- Ex-ante verification of study programmes
- Ex-post re-accreditation verification of study programmes
- Follow-up/monitoring of study programmes
- Modification of study programmes
- Accreditation of Quality Assurance Systems
- Institutional accreditation
- Reviews of private universities for recognition
- Joint programme accreditations

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by AAC-DEVA including the preparation of a self-assessment report;
- A site visit by the review panel to AAC-DEVA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a Higher Education institution and student member. One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

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

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

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

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which AAC-DEVA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to prescrutinise it before forwarding the report to the panel of experts. The purpose of the prescrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

AAC-DEVA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to AAC-DEVA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by AAC-DEVA in arriving in Córdoba, Spain.

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

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to AAC-DEVA within 11 weeks of the site visit for comment on factual accuracy. If AAC-DEVA chooses to provide a 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 AAC-DEVA, finalise the document and submit it to ENQA.

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

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

AAC-DEVA is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which AAC-DEVA expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

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

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

5. Use of the report

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

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether AAC-DEVA has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to AAC-DEVA and ENQA and until it is approved by the Board the report may not be used or relied upon by AAC-DEVA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. AAC-DEVA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

AAC-DEVA shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, AAC-DEVA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to AAC-DEVA if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	June/July 2018
Appointment of review panel members	November 2018
Self-assessment completed	December 2018
Pre-screening of SAR by ENQA coordinator	January 2019
Preparation of site visit schedule and indicative timetable	February 2019
Briefing of review panel members	March 2019
Review panel site visit	April 2019
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	Early June 2019
Draft of evaluation report to AAC-DEVA	Late June/Early July 2019
Statement of AAC-DEVA to review panel if necessary	July 2019
Submission of final report to ENQA	By August 2019
Consideration of the report by ENQA Board and response of AAC- DEVA	September 2019
Publication of the report	September 2019

ANNEX 3: GLOSSARY

AAC Andalusian Agency of Knowledge

AGAE Andalusian Agency for University Quality Assurance and Evaluation

CU University Professor

DEVA Direction for Evaluation and Accreditation

ECTS European Credit Transfer System

ENQA European Association for Quality Assurance in Higher Education

EQA External Quality Assurance

EQAR European Quality Assurance Register

ESG European Standards and Guidelines 2015

HE Higher Education

HEI Higher education institution IQA Internal Quality Assurance

IQAS Internal Quality Assurance System

SAR Self-Assessment Report

MCERL Common European Framework of Reference for Languages

PDI Teaching and Research Staff
PTU University Associate Teacher

R&D&I Research, Development and Innovation

REACU Spanish Network for Quality Assurance in Higher Education

RIACES Ibero-American Network for Quality Assurance in Higher Education

QA Quality Assurance

QAS Quality Assurance System
SUA Andalusian University System
SUE Spanish University System

ToR Terms of Reference
UAL University of Almería
UCA University of Cádiz
UCO University of Córdoba
UGR University of Granada
UHU University of Huelva
UJA University of Jaén

ULA University Loyola Andalusia

UMA University of Málaga

UNIA Andalusian International University

UPO University Pablo de Olavide

US University of Seville

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY AAC-DEVA

- Andalusian Agency of Knowledge (AAC) Direction for Evaluation and Accreditation (DEVA) Self-Assessment Report 2014-2018 (including extensive hyper-links to documents consulted by review panel)
- 2. Schedule of the site visit.
- 3. Translated examples of reports.
- 4. Minutes of the meetings of the Governing Board of the Andalusian Agency of Knowledge, (in translation) held on Jan 31st, June 20th, Oct 6th, Nov 24th in 2017 and Jul 9th, Dec 4th in 2018.
- 5. Minutes of the meetings of the Technical Committee for the Evaluation and Accreditation held on March 21st, June 22nd, Oct 23rd in 2017 and Feb 21st, May 10th, 23rd in 2018.
- 6. Assessment Reports (in Spanish and English)
- 7. Membership of all Committees in AAC-DEVA

ADDITIONAL MATERIAL

https://enqa.eu/index.php/publications/papers-reports/occasional-papers/

http://www.equip-project.eu

https://enqa.eu/wp-content/uploads/2013/06/Guidelines-for-external-reviews-of-quality-assurance-agencies-in-the-EHEA1.pdf



THIS REPORT presents findings of the ENQA Agency Review of the Andalusian Agency of Knowledge, Department of Evaluation and Accreditation (AAC-DEVA), undertaken in 2019.





2019 ENQA AGENCY REVIEW