

ENQA TARGETED REVIEW

# QUALITY ASSURANCE AGENCY FOR THE UNIVERSITY SYSTEM IN CASTILLA Y LEÓN (ACSUCYL)

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## EXECUTIVE SUMMARY

This report analyses the compliance of the Quality Assurance Agency for the University System in Castilla y León (ACSUCYL) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from January until October 2024 with an on-site visit from 9 until 11 July 2024. The agency underwent the review against the ESG following the methodology outlined in the *Guidelines for ENQA Targeted Reviews*.

ACSUCYL is the external assessment body for higher education in Castilla y León. Its mission is the assessment, accreditation and certification of quality in universities in Castilla y León as well as research and higher education centres. All activities related to evaluation and accreditation of degree programmes and higher education institutions fall within the scope of the ESG.

The targeted review focuses on the ESG standards in which ACSUCYL was assessed as partially compliant by the EQAR Register Committee during the previous full review, specifically ESG 3.1 and 3.3. The review also addresses ESG 2.1 to 2.7 for the European Approach for QA of Joint Programmes following the 2024 EQAR Register Committee decision on ACSUCYL's change report. Furthermore, ESG 2.1 covers all the agency's activities following the ENQA guidelines for targeted reviews. Finally, the report covers ESG 3.6 as the self-selected enhancement area.

The review panel found that ACSUCYL plays a significant role in ensuring the quality of higher education in the region of Castilla y León. Stakeholders value the agency's efforts, and the outcomes of its evaluations provide a strong foundation for improving the quality of the educational programmes. Additionally, there is effective collaboration with higher education institutions.

A matter of concern is the involvement of students in the agency's activities. Although the review panel has observed an increase in student involvement, no significant governance changes have occurred since the 2019 review. A more proactive approach is needed to stimulate and facilitate student participation, enhancing opportunities and creating a greater impact. It is encouraging that most stakeholders support this idea. A significant step forward would be to establish formal student representation with voting rights on both the Board of Directors and the Advisory Board. This would enhance inclusivity and ensure diverse perspectives in decision-making. Also, the position of assessment commissions in the decision-making process must always remain impartial, with its task focused solely on maintaining consistency of judgement without interfering with the evaluation reports produced by the expert panels. Furthermore, the review panel recommends revising the organisational chart to promote a more balanced and collaborative governance structure, particularly scrutinising the director's position. The shortage of organisational independence is also evident in the lack of both financial and human resources. To fully address the agency's independence issues, it must increase efforts to persuade the regional government to adapt the legal framework to align with ESG standards. Due to the limited progress made since the last review, the review panel determines that ESG 3.1 is partially compliant. Additionally, since there have been no significant governance changes to address the agency's independence issues, the review panel concludes that ESG 3.3 is non-compliant.

The review panel has found that ACSUCYL effectively links universities' internal quality assurance systems with its own external quality assurance activities, including the European Approach for Quality Assurance of Joint Programmes. The review panel also noted that the agency has addressed the 2019 recommendation on ESG 1.3 by taking steps to integrate student-centred learning into its quality assurance processes. However, the review panel emphasises the importance of the student-centred learning approach and encourages the agency to advance to the next phase. Therefore, ACSUCYL should offer university leaders additional guidance on expanding educational methods that foster active student engagement in the learning process.

Considering ACSUCYL's adherence to ESG Part 2 for the European Approach for Quality Assurance of Joint Programmes, the review panel identified issues with both the implementing process (ESG 2.3) and the reporting (ESG 2.6). While the review process covers all necessary steps, there is considerable room for improvement. Specifically, the site visit is deemed inadequate in both duration and depth, leading to an assessment report that also lacks thoroughness. The review panel found the reports and their publication deficient in many ways. It believes that implementing the European Approach for Quality Assurance of Joint Programmes would benefit from greater consistency and transparency. Given the numerous and varied deficiencies the review panel concludes that ACSUCYL does not meet the requirements for ESG 2.6 and is partially compliant with ESG 2.3.

During the site visit, the review panel discussed the selected enhancement area ESG 3.6 with various stakeholders and found that the agency is still close to implementing the 2019 recommendation to increase its impact on higher education and improve quality. As ACSUCYL has yet to decide on a specific course of action, the review panel recommends a general four-step approach: diagnosis, action plan, implementation, and analysis. This methodology provides a structured framework for problem-solving and project management, facilitating systematic identification, planning, execution, and evaluation of actions. By adopting these four steps, ACSUCYL can more effectively address the 2019 recommendations and capitalise on opportunities. This approach has the potential to transform the agency's internal quality assurance and professional practices, promote a culture of self-reflection and continuous improvement, and ultimately enhance the quality of higher education in the Castilla y León region.

The review panel assessed the agency's compliance with the ESG Parts 2 and 3 as indicated in the table below.

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

ESG	Compliance according to the targeted review <sup>1</sup>	Compliance transferred from the last full review <sup>2</sup>
2.1	Compliance	N/A
2.2	Compliance (for new or changed QA activities only)	
2.3	Partial compliance (for new or changed QA activities only)	
2.4	Compliance (for new or changed QA activities only)	
2.5	Compliance (for new or changed QA activities only)	
2.6	Non-compliance (for new or changed QA activities only)	

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

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

2.7	Compliance (for new or changed QA activities only)	
3.1	Partial compliance	N/A
3.2		Compliance > Compliance
3.3	Non-compliance	N/A
3.4		Compliance > Compliance
3.5		Compliance > Compliance
3.6		Compliance > Compliance
3.7		Compliance (by virtue of applying) > Compliance

Based on ACSUCYL's compliance with the ESG standards presented above and based on the review panel's analysis provided in this report, the review panel considers that ACSUCYL does not comply with the ESG. The agency is recommended to take appropriate action to achieve compliance in all standards at the earliest opportunity.

# INTRODUCTION

This report analyses the compliance of the Quality Assurance Agency for the University System in Castilla y León (La Agencia para la Calidad del Sistema Universitario de Castilla y León, ACSUCYL) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in January until September 2024 and should be read together with the external review report of the agency's last full review against the ESG.

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

### BACKGROUND OF THE REVIEW

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 compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

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

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

### SCOPE OF THE REVIEW

As listed in the terms of reference, ACSUCYL is carrying out the following activities within the scope of the ESG:

- Verification of official degrees (ex-ante accreditation) / modification
- Follow-up of official degrees
- Renewal of accreditation of official degrees (ex-post accreditation)
- Assessment of Higher Art Master Programmes (ex-ante and ex-post evaluation)
- European Approach for QA of Joint Programmes
- Institutional accreditation and Certification of the implementation of the internal quality assurance system (ELENCHOS Programme)
- Teaching performance assessment programme (DOCENTIA Programme)
- Evaluation to create, recognize, modify or withdraw university centres

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

- Assessment programmes evaluating research
- Assessment programmes evaluating teaching staff

The terms of reference also list the focus areas for ACSUCYL's targeted review:

- Standards with a partial compliance conclusion in the 2020 Register Committee's renewal decision: ESG 3.1 and 3.3

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

- Standards 2.1 to 2.7 for the European Approach for QA of Joint Programmes following the 2024 Register Committee's decision on the agency's change report
- Standard 2.1 as required by the ENQA guidelines for targeted reviews
- Standard 3.6 as the self-selected standard for enhancement

## MAIN FINDINGS OF THE 2019 REVIEW

ACSUCYL's last review against the ESG took place in 2019. The review panel from that year determined that the agency fully complied with six standards. The remaining eight standards were assessed as being substantially compliant.

Following the decision by the EQAR Register Committee on 25 June 2020, ACSUCYL's level of compliance with ESG Parts 2 and 3 was as follows:

<b>Standard</b>	<b>Review panel conclusion</b>	<b>Register Committee conclusion</b>
ESG 2.1	substantial compliance	compliance
ESG 2.2	substantial compliance	compliance
ESG 2.3	full compliance	compliance
ESG 2.4	substantial compliance	compliance
ESG 2.5	full compliance	compliance
ESG 2.6	substantial compliance	compliance
ESG 2.7	full compliance	compliance
ESG 3.1	substantial compliance	partial compliance
ESG 3.2	full compliance	compliance
ESG 3.3	substantial compliance	partial compliance
ESG 3.4	substantial compliance	compliance
ESG 3.5	substantial compliance	compliance
ESG 3.6	substantial compliance	compliance
ESG 3.7	full compliance	compliance (by virtue of applying)

## REVIEW PROCESS

The 2024 external targeted review of ACSUCYL was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews* (2021), the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference.

The review panel for the targeted review of ACSUCYL was appointed by ENQA and composed of the following members:



- Nora Skaburskienė (Chair), Director for Academic Affairs Office, Vilnius Gediminas Technical University, Lithuania, ENQA-nominated Member;
- Michèle Wera (Secretary), Policy Officer, Accreditation Organisation of the Netherlands and Flanders, the Netherlands, ENQA-nominated Member;
- Manuel João Tavares Mendes Costa, Professor, Pro-rector for Student Affairs and Pedagogical Innovation, University of Minho, Portugal, EUA-nominated Member;
- Adrian Korzeniowski, Bachelor studies in Electronics and Telecommunication, Lodz University of Technology, Poland, Member of the European Students' Union (ESU) Quality Assurance Student Experts Pool.

Goran Dakovic (ENQA Head of Agency Reviews) acted as the review coordinator.

On 15 May 2024, ENQA organised an online panel briefing. EQAR joined the meeting to introduce the agreed terms of reference. The key points of focus included the scope of the review and the procedures for conducting a targeted review. Two days later, on 17 May 2024, the review panel received ACSUCYL's self-assessment report (SAR). Subsequently, the review panel participated in two additional online meetings on 13 June and 1 July 2024 to discuss the content of the SAR including the selected enhancement area and to prepare for the site visit. In between both review panel meetings, an informative meeting with the ACSUCYL resource person took place on 18 June 2024.

At an early stage, all review panel members began working on the draft review report. The draft report was completed on 11 September 2024 and sent to ACSUCYL for correction of factual errors on 11 September 2024. The agency's response was received on 25 September 2024. The agency identified very few factual errors but primarily commented on differing views. After making some minor revisions, the final review report was submitted to ENQA's Agency Reviews Committee on 2 October 2024.

### **Self-assessment report**

ACSUCYL established both internal and external working groups to prepare the SAR. Throughout this process, all ACSUCYL staff members were actively involved. At a later stage, the agency's various bodies and stakeholders, including the Advisory Board and Student Board, were invited to provide feedback on the report. After incorporating their comments, the report was finalised and sent to ENQA. When asked for their comments, however, none of the interviewees were able to provide specific examples.

The review panel found the document informative and complete. However, the self-critical analysis was relatively concise. Also, the information on the European Approach for Quality Assurance of Joint Programmes was somewhat lacking in depth, mainly due to the limited number of procedures. Near the end of the site visit, the review panel received new material on joint programmes that needed further scrutiny.

Additionally, the agency shared its perspective on the selected enhancement area, ESG 3.6 Internal quality assurance and professional conduct. The agency finds it challenging to implement the recommendations as the outcome from the 2019 review. However, the document did not clearly convey what the agency's intentions were or what plans were already established. When prompted to provide additional information or documentation, the agency was unable to do so. As a result, the

review panel relied on discussions and exchanges of views with the agency and stakeholders to gather insights.

### **Site visit**

The site visit took place from July 9 to 11 July 2024. While in Valladolid, the review panel met with ACSUCYL's internal and external stakeholders. On the first day of the visit, the review panel met with the agency's leadership and staff, the Student Board, and the Advisory Board. During the second day, the review panel spoke with officials from the Ministry of Education, representatives of higher education institutions, students and alumni, external experts, and the Degree Assessment Commission. The interviews provided ample opportunity to discuss and verify the findings in the SAR and gather additional specific evidence. At the end of the visit, the review panel assessed compliance with each standard, assigning scores of compliant, partially compliant, or non-compliant. On the third and final day, the site visit concluded with a debriefing meeting with the agency.

Throughout most interview sessions, an interpreter's services were utilised. This somewhat hindered the discussion and reduced the time available for exchanging views. Nevertheless, the review panel greatly appreciated the excellent service provided over the entire three-day visit.

A more detailed programme of the site visit is provided in the Annex.

## **CHANGES WITHIN THE AGENCY**

### **HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM**

The higher education system in the Castilla y León region consists of nine universities, including four public and five private institutions. There have been no changes since the last full review in 2019.

Public universities:

1. University of Burgos
2. University of León
3. University of Salamanca
4. University of Valladolid

Private universities:

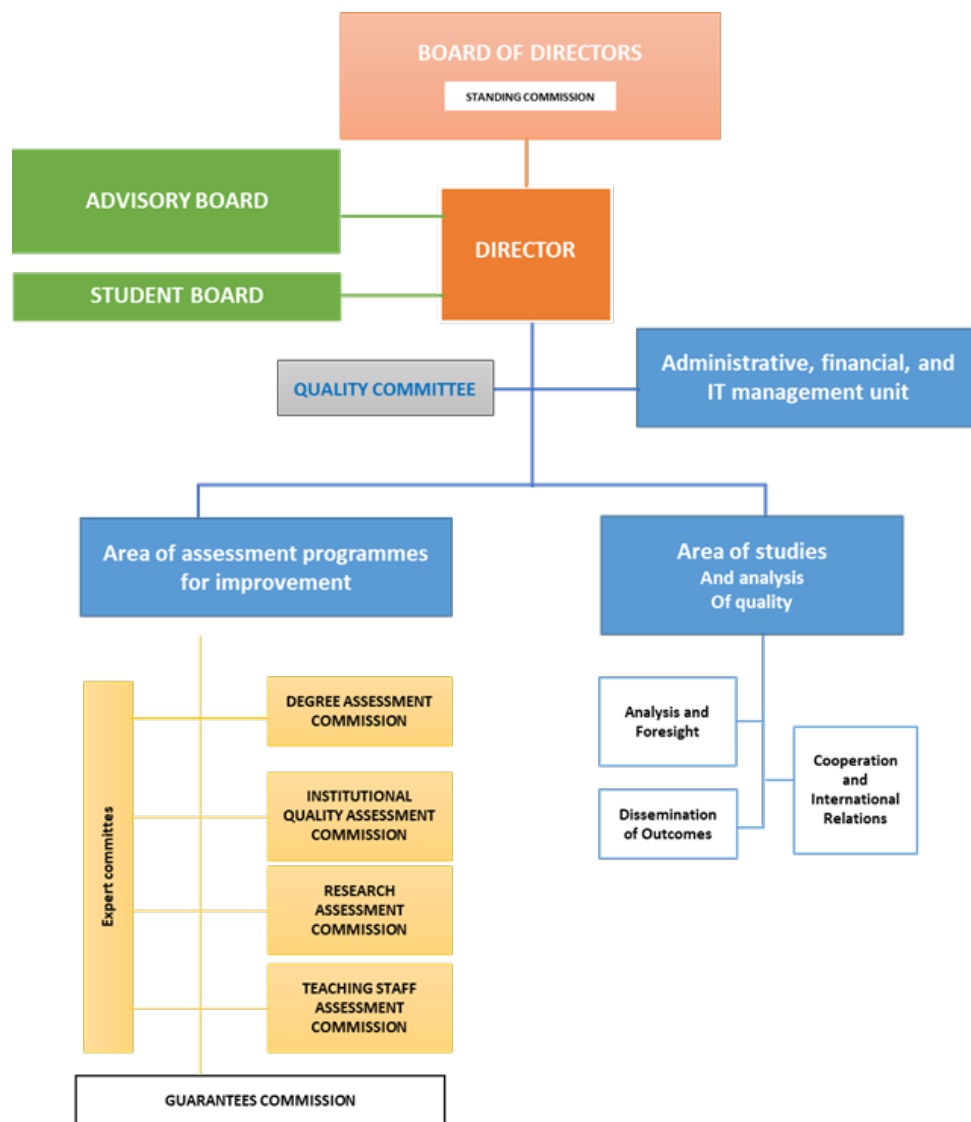
1. IE University (Segovia)
2. Isabel I de Castilla International University (Burgos)
3. Miguel de Cervantes European University (Valladolid)
4. Pontifical University of Salamanca
5. Santa Teresa de Jesús Catholic University of Ávila

Since the previous review, higher education institutions in the Castilla y León region have progressively increased their involvement in international activities. Recently, regional universities have redefined their roles and missions, emphasising the enhancement of innovative teaching and learning methods.

The quality assurance system supports these initiatives, and external assurance mechanisms ensure that the degrees awarded to students achieve international recognition. This strategy seeks to expand access to higher education for both students and staff in a global context. The newly introduced activity focused on assessing joint programmes represents the latest addition to the quality assurance system.

Additionally, the SAR highlights a number of legislative changes in Spain, which have had minimal impact on ACSUCYL's core activities. The agency's procedures have been updated to comply with the new regulations. Also, during the review period, both the universities and the agency had to adjust to the restrictions imposed by the COVID-19 pandemic, effectively utilizing the agency's guidelines for remote teaching.

## ACSUCYL'S ORGANISATION/STRUCTURE



ACSUCYL's structure distinguishes between bodies responsible for governance, management, representation, advising, and consulting, and those tasked with carrying out assessment, certification, and accreditation activities:

- Governing bodies: Board of Directors, Director
- Consultative bodies: Advisory Board

- Assessment bodies: Teaching Staff Assessment Commission, Research Assessment Commission, Degree Assessment Commission, Institutional Quality Assessment Commission

To ensure compliance with international standards in its activities, ACSUCYL has established the following bodies:

- Student Board: to encourage student participation in the agency's activities.
- Guarantees Commission: to serve as a technical appeals mechanism for the agency's activities.

To ensure the proper execution of the agency's processes, a Quality Committee has been established to oversee and ensure that the commitments made within the internal quality assurance system are fulfilled.

More detailed information on the key bodies can be found on the agency's website: <https://www.acsucyl.es/web/en/agency/about.html>

ACSUCYL's organisational structure and governance have remained largely unchanged since the last full review. According to the SAR, following the 2019 review, student representation has increased in at least three of the agency's official bodies. In accordance with an internal agreement, student participation is allowed in additional bodies and committees taking into account legal constraints. Further student involvement is still under discussion and will be addressed under ESG 3.1.

Noteworthy is the change in ACSUCYL's leadership, with a new director serving from 2021 until 2023. At the time, procedures were underway to select and appoint his replacement. For the time being, an acting director had been appointed. She combines this function with the position of director of universities and research at the ministry of education. For this reason, the review panel asked the acting director to recuse herself from the meeting with the ministry as part of the site visit programme. The review panel will assess the agency's reliance on the regional government under ESG 3.3.

During the period under review, both the universities and the agency faced numerous challenges due to the pandemic. Procedures were adapted accordingly, with remote working being implemented. The SAR emphasises that, at no time during this period, did work cease.

## ACSUCYL'S FUNDING

There has been no change in the basic funding of ACSUCYL since the previous review. The agency has its own separate and multi-year budget that ensures sufficient funding for its current activities and tasks. Furthermore, to diversify its sources of income and meet the demands of its various stakeholders, ACSUCYL has continued to work on its services for public and private entities. These revenues assist in addressing the agency's additional needs.

## ACSUCYL'S FUNCTIONS, ACTIVITIES, PROCEDURES

The SAR notes some legislative changes in Spain that prompted the agency to update guidebooks and protocols. The new law and decrees, however, have not significantly impacted ACSUCYL's operations, which continue much as before.

ACSUCYL identifies eight ongoing activities within the scope of the ESG, including one new initiative: the European Approach for Quality Assurance of Joint Programmes. This eighth activity is explicitly mentioned in the 2024 ENQA Terms of Reference as one of the focus areas of the targeted review.

1. Verification and modification of official degrees (ex-ante accreditation)
2. Follow-up of official degrees
3. Renewal of accreditation of official degrees (ex-post accreditation)
4. Assessment of master's degrees in art
5. Institutional accreditation and certification of the implementation of internal quality assurance systems (ELENCHOS programme)
6. Assessment programme for teaching performance (DOCENTIA programme)
7. Assessment for the creation, recognition, modification or discontinuance of university centres
8. European Approach for Quality Assurance of Joint Programmes

In addition to its regular assessment programmes, ACSUCYL collaborated on various activities with the Spanish Network of University Quality Agencies (REACU). They jointly worked on implementing legislative changes and the European Approach for Quality Assurance of Joint Programmes. The latter will be discussed under Part 2 of the ESG.

Lastly, in 2021, ACSUCYL's new Strategic Plan 2021-2025 was approved.

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

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

#### 2019 ENQA review recommendation

ACSUCYL is recommended to further increase the involvement of students in its Governing and Advisory Board.

#### 2020 EQAR renewal decision

The limited involvement of students in the agency's governance and work.

#### 2024 Terms of Reference 2024

Consider how the agency has addressed the limited involvement of students in its governance and work, and whether relevant changes have been made.

#### Evidence

According to the SAR, the agency maintained its commitment to fostering continuous quality improvement in the region throughout the review period. ACSUCYL's mission is reflected in its core activities, which include the assessment, accreditation, and certification of quality for universities and research centres in Castilla y León in line with the agency's strategic plan. The evaluation activities conducted during the period from 2020 to 2024 are outlined in Table IV of the SAR. The visit indicated adequate engagement of stakeholders in general as referred to in ESG 3.1. Guided by the Terms of Reference, the review panel directed specific efforts to understand the role of students in the governance of ACSUCYL.

During the site visit, stakeholders highlighted the crucial role of the agency in upholding the quality of higher education in Castilla y León. They acknowledged ACSUCYL's efforts and the outcomes of its evaluations, viewing them as a vital foundation for improving their programmes. Furthermore, legal changes necessitate adjustments to universities' educational programmes.

Under ESG 3.1, both the SAR and the targeted review focused primarily on student involvement. The 2019 review of ACSUCYL, particularly regarding ESG 3.1, revealed several concerns about student

involvement in the agency's activities, including both management and operational aspects, which were included in the standard's recommendation. These concerns pertain to the standard's call for agencies to actively engage stakeholders in their governance and operations.

The strategic plan for years 2021-2025 (approved in May 2021) includes two objectives related to student participation. Under Line I - Assessment Processes, the goal is "to boost the role played by university students in assessment processes." Under Line VI - Organisation, Resources, and Communication, the aim is "to increase student involvement in defining assessment processes and in decision-making bodies."

Within these objectives, specific actions were undertaken to enhance student involvement. Specifically, the agency mentions in its SAR that "through a Degree Assessment Committee agreement, since April 2021 a student has been present at Degree Assessment Committee meetings, taking part in all the assessment processes." This was confirmed by various interviewees during the site visit. Additionally, according to the SAR "by agreement of the Board of Directors at its meeting on 25 October 2021, there is now student representation at those Board meetings where the agenda advises their participation". The SAR states that no such invitations have been extended to date, which was confirmed during the site visit. A proposal to have a student representative present on the Advisory Board has been rejected on the grounds of this body being a consultative body, similar in its role to the Student Board.

The Student Board, established at the Board of Directors meeting on 28 April 2017, remains the main body dealing with participation of students in the agency's work. It functions according to specific rules. According to them, the Student Board is made up of "one representative from each university within the Castilla y León higher education system (SUCYL) who shall hold the position of student representative on the Social Council or equivalent body at their university". Additionally, the Board "shall be chaired by the Director of ACSUCYL" and "The Board shall have a Secretary, who shall have the right to speak and vote, and who shall be a senior consultant in quality programmes at ACSUCYL".

According to its rules, the Student Board shall meet no less than twice a year. The annual activities reports that can be found on the agency website state that while in 2021, the Student Board met on 9 July and on 30 November, in 2022 only one meeting was held - on 30 November. In its response to the review panel's draft report, the agency highlights that the Student Board convened on 13 February 2024 to discuss proposals for inclusion in the agency's action plan. Additionally, on 27 February 2024, the Student Board was informed of the SWOT analysis, and a questionnaire was distributed to all members, inviting their participation. However, the review panel was unable to verify this information. No annual activities report for 2023 has been published on the website to date. According to information provided during the site visit, the Student Board met on 17th April 2024 to discuss the draft of the SAR. The student body was not involved in writing the report.

Apart from its long-term strategy, the agency issues an annual action plan, detailing specific actions needed to achieve the strategy's objectives. These documents are available on the agency's website. In the annual action plans for the past three years (2024, 2023, and 2022), the actions related to student objectives are listed. However, they lack specific timings and show little to no changes over these years.

For line I, "Promotion of student participation in the internal quality assurance systems of Universities," the aim is described as: "In the development of the powers that the autonomous university regulations grant to the Agency, to promote and promote the development of internal quality assurance systems (IQAS) for the evaluation and improvement of Universities, this program aims to enhance participation and achieve greater student involvement in these SGIC." Regarding phases and timing: "With the

collaboration of the student representative bodies in the Universities, the Agency will carry out actions to promote student participation in the SGIC, informing about the impact that these systems have in improving the training offer of the universities.”

For line VI, “Student participation in the analysis and planning of ACSUCYL activities,” the aim is “Promote participation and achieve greater involvement of students from the University System of Castilla y León in the Agency's advice.” Regarding phases and timings: “Through the Student Council, the involvement of students in the functioning of the Agency and in the proposal of initiatives for its improvement will continue to be encouraged. In particular, its performance will be enhanced in the following aspects:

- Contribution of proposals to the Agency's Annual Program of Actions, identifying and proposing Agency activities with an impact on students.
- Issuance of reports on those issues of interest to students in relation to the Agency”.

In the SAR, the agency highlighted one of “Possible areas of improvement” for this standard to be a need for “a greater involvement of students in its Student Council to obtain more feedback from them on the Agency's activities. The regulation of this body should be reviewed to establish a different selection criterion of its members to achieve greater involvement”.

In its SWOT analysis, the agency identified two weaknesses regarding student participation: “scant Student Board involvement in the Agency's activities” and “scant student involvement in conducting the quality assurance processes.”

Also, during the site visit, the review panel noted that although there was a general awareness of the importance of student contributions, a consensus on their added value was not consistently apparent. The review panel encountered differing opinions on the benefits of student involvement, which was especially evident within the Student Board itself.

### **Analysis**

The panel has determined that all stakeholders align with the principles of ACSUCYL's mission and vision, as well as the derived activities for quality assurance. These activities are carried out according to a set framework with a clear focus on improvement and accountability. The panel also noted that both the institutions and the agency have seamlessly adapted to legal changes.

The review panel found that ACSUCYL enjoys a high level of trust among its stakeholders. This was also apparent in the 2019 review. However, the agency recognizes issues with student involvement in its operations, and the panel finds that additional measures are needed to adequately address these concerns.

The strategic plan appropriately includes objectives related to student participation, but the specific actions detailed in the annual action plans do not seem to ensure the intended developments and the required accountability. The student-related objectives in recent action plans have been generally and consistently worded over the past few years. However, there is an opportunity to introduce new initiatives and reflect on them in the annual reports to further advance progress on these important issues.

While having a Student Board as a consultative committee is considered useful by various stakeholders, including students, and student participation has been properly guaranteed in the Degree Assessment Committee with praiseworthy effect, these measures do not fully address the issues identified in previous review.



Because of lack of student participation in the governing body, students' roles are confined to supporting the agency in its work, missing opportunities for involvement in governance or strategic discussions. The Student Board can offer opinions and recommendations but meets infrequently and is often consulted on decisions already made rather than being involved in the discussion. The Student Board provides a platform for feedback, Increasing the frequency of meetings and actively involving board members in discussions earlier in the decision-making process would enhance its influence and overall effectiveness in shaping discussions. Additionally, with the Director's presence in most agency bodies, with voting rights on the Board of Directors, and the inclusion of agency staff as the Student Board secretary, the independence of the Student Board is questionable. Ensuring the full independence of the Student Board could further enhance its credibility and impact. Further details on this issue are discussed under ESG 3.3.

During the site visit, the review panel met with dedicated students who support the agency's operational work. However, not all student representatives appeared equally informed about the various opportunities for student participation, nor did they seem equally prepared to take on a more proactive role. The agency itself may need to adopt a more proactive approach to stimulate and facilitate student involvement, increasing opportunities for participation and creating a greater impact. Enhanced communication strategies, such as developing a dedicated section on the agency's website with detailed information about participation opportunities, could help ensure that students are better informed and more effectively engaged in the agency's work.

Considering the previously issued recommendation for this standard 3.1 and the evidence provided, the review panel concludes that the agency has only partially resolved the issues related to student participation. While there has been some improvement in involving students in the agency's work, no significant changes have been made regarding governance. The Student Board remains a purely consultative body with no real influence on decision-making. While the review panel acknowledges the challenges posed by the legal framework, it believes that additional actions within this framework could enhance student participation. Although student participation in Board of Directors meetings became possible in October 2021 - a positive development - the agency has not utilised this opportunity in the past years. Furthermore, the review panel emphasises that previously recommended governance changes are still relevant and remain critical for incorporating students' perspectives into strategic decision-making.

Aside from the follow-up on the recommendation on student involvement, the review panel finds that ACSUCYL meets some aspects of ESG 3.1. However, this does not change the fact that student participation is still not up to standard. Despite the agency's response to parts of the recommendation from the previous review, meaningful progress in this critical area is lacking. The review panel considers this issue to be of utmost urgency. Consequently, as the agency has addressed only part of the recommendation from the last visit, the review panel considers the agency to be only partially compliant with this standard according to the relevant terms of reference.

### **Panel recommendations**

1. Enhance students' involvement in governance by providing more opportunities for active participation and ensuring their voices are heard in decision-making processes.
2. To maximise impact, actively facilitate and stimulate student involvement by creating engaging opportunities and fostering clear, open communication.

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

3. Consider establishing a separate section on the agency's website dedicated to student-related matters to enhance accessibility and encourage greater student participation in the agency's governance and activities.

**Panel conclusion: partially 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.

### **2020 EQAR renewal decision**

The Register Committee could not concur with the conclusion of the panel of (full) compliance but concluded that ACSUCYL complies only partially with the ESG 3.3. In terms of organisational independence, the evidence presented by the panel shows that members of the Governing Board are appointed by the regional minister responsible for universities and that the Governing Board has a strong representation of its regional Government, including the Chairperson. Also, the panel's analysis further shows that the agency is largely dependent on the regional Government, not only for the appointment of its Governing Board members, but also for the approvals and hiring of new staff and the annual approval of its budget.

### **2024 Terms of Reference**

Consider how the agency ensures its independence from the regional Government, in particular, appointment of members in the Governing Board by the regional minister, approvals and hiring of new staff and the annual approval of its budget by the regional Government as well as financial and staffing decisions.

### **Evidence**

In its SAR, the agency references the law governing universities in the region (Law 3/2003, of March 28, on Universities of Castilla y León). According to this law, the agency is a public body with legal personality and its own assets. It is also stipulated that the Board of Directors is the official governing body, chaired by the head of the regional ministry responsible for universities. The Minister has the authority to appoint eight members to the Board of Directors, including the rector of a private university in the region, two presidents of the social councils of the public universities, two people from the General Directorate, a labour market representative, and two recognized individuals from the academic or scientific community. The remaining positions on the board are filled by individuals holding specific positions as indicated in the law.

Most of the board members are appointed by the Minister of Education or assume their roles by holding specific positions within state administration institutions, such as the Head of the Department responsible for Universities, the Head of the General Directorate responsible for Universities and Research, and the Head of the General Treasury of the Ministry of Finance. At present, the positions of Head of the General Directorate responsible for Universities and Research and the agency's director are combined in the person of the interim director. As a result, the Board of Directors

consists of 16 members instead of 17. In her position as Head of the General Directorate responsible for Universities and Research, the agency's interim director also acts as the vice chair of the Board of Directors.

Currently, the majority of the members of the Board of Directors (11 out of 16) represent the agency's stakeholders, including representatives from public and private universities, the business sector, and the academic and research sectors. International experts are not included on the Board of Directors. In reply to the review panel's draft report, the agency notes that at least two Spanish board members have international careers. Due to legal restrictions, the Board of Directors does not include students. According to an internal agreement (25 October 2021), students may attend board meetings if invited. No invitations have been extended to date.

Decree 15/2015, of 19 February, establishes the rules governing the agency. It is stipulated that the Board of Directors is responsible for hiring and dismissing the director, defining the director's functions, and setting the director's remuneration. The director serves as ACSUCYL's single-person governing authority, responsible for implementing and ensuring compliance with the Board of Directors' agreements, organising and managing the agency's activities, and overseeing its staff.

The previous director, who was appointed in 2021, stepped down in mid-2023. Since then, an acting director has been appointed. This acting director is the Vice President of the Board of Directors and also serves as the head of the General Directorate responsible for Universities and Research in the Ministry responsible for universities. The selection process for the new director is still ongoing and follows state-regulated procedures.

ACSUCYL's organisational structure places the director at the centre, acting as the sole connection among all constituent units: the Board of Directors, the Advisory Board, and the Student Board. These boards do not formally interact with one another, which positions the director as the only entity capable of synthesising advice and recommendations from all these boards.

The director seeks guidance from the Advisory Board, which includes representation from various stakeholders, including international experts and employers. According to the SAR, a proposal for including student representation on the Advisory Board was considered but ultimately rejected based on agency's reasoning that the Advisory Board functions solely as a consultative body comparable to the Student Board.

ACSUCYL is required to regularly sign an agreement with the regional Ministry of Education, ensuring that the agency will operate independently in all assessments it undertakes. The most recent agreement was signed in 2021 and is valid for four years. This agreement specifically covers evaluations related to research only and is not within the scope of the ENQA targeted review.

As a public entity, the agency's funding is provided by the regional government. The Board of Directors approves the agency's annual draft budget, balance sheet, financial report, and accounts, which are then submitted to the regional government for final approval. In the SWOT analysis presented in the SAR, the agency identifies the threat of "being unable - due to a lack of staff - to attend to all of the requests for assessment and to take on all of the tasks assigned to ACSUCYL in the decree that established its creation." During the site visit, the issue of staffing was highlighted and suggested as an area for improvement by the responsible university officers. A summary of their opinion is presented in the SAR.

The director of the agency appoints the experts for internal assessment committees, and the composition of each assessment body is published on the agency's website. The agency designs and approves assessment procedures and methods in accordance with national legislation. The law

regulating the activities of universities in the region stipulates that the assessment bodies of the agency are responsible for issuing assessment reports. These reports then form the basis for formal decisions by the Regional Ministry of Education of Castilla y León.

Finally, the SWOT analysis identified the agency's transparency, objectivity, reliability, and independence as key strengths of ACSUCYL. Many stakeholders confirmed this sentiment during the site visit. In this case, independence was primarily referring to lack of interference in the universities.

## **Analysis**

### *Organisational independence*

The review panel has determined that members of the Board of Directors are nominated and appointed in accordance with regional laws. The review panel observed that the Board of Directors primarily handles managerial issues, such as the agency's budget and staffing. As the main governing body of ACSUCYL, the board could benefit from focusing more on the quality aspects of the agency's work. Addressing operational matters in alignment with the agency's vision and action plans would make meetings more productive and engaging for the stakeholders on the board, including student representatives. Since 2021, students have had the opportunity to attend board meetings depending on the relevance of the agenda items. However, none of the topics have been deemed relevant by the agency to students thus far. The review panel views this as a missed opportunity for involving students more actively in the agency's governance as already noted under ESG 3.1.

During the site visit, the review panel asked various interviewees whether any discussions regarding organisational independence and the involvement of students in the agency's governance had taken place since the previous review in 2019. None of the interviewees were aware of any such discussions or attempts to organise them. However, some of the individuals the review panel met, including representatives of the Ministry of Education, expressed openness to discussing and reconsidering the agency's independence and student involvement. As a result, the review panel recommends the agency to establish formal student representation with voting rights on the Board of Directors to improve inclusivity and incorporate a range of perspectives in decision-making.

For similar reasons, the review panel encourages ACSUCYL to appoint a student representative to the Advisory Board. Additionally, the agency would benefit from a more proactive stance by this consultative body. During the site visit, it was evident that the Advisory Board was eager to adopt a more active role and enhance its influence on the agency's future.

The review panel noted that the question of the agency's independence, given that the acting director currently holds a leading position in the General Directorate responsible for higher education, did not prompt any consideration of the agency's direct subordination to the Ministry of Education of Castilla y León. However, the review panel views this arrangement as a considerable hindrance to the agency's independence.

Additionally, the review panel noted that ACSUCYL's organisational structure is heavily centred around the role of its director, who is involved with many of the agency's bodies and committees. This central role grants the director substantial influence and authority within the organisation. The review panel also noted that the director is a full member of the Board of Directors with voting rights and serves as its vice chair. Furthermore, due to the dual role of the interim director, the number of members of the Board of Directors has been reduced to 16, rather than the intended 17, which may limit the board's capacity to operate effectively and make comprehensive decisions. According to the delegated authorities outlined in the law, the director's primary responsibility is the management and economic health of the organisation. The review panel concludes that the director should not be a

member of the Board of Directors, as this conflicts with the board's responsibilities under Law 3/2003. The Board of Directors makes decisions closely related to the director's role. For the director, serving simultaneously as a full member and the vice chair of the Board of Directors, presents a significant conflict of interest, potentially compromising the impartiality and objectivity required when making decisions directly related to their responsibilities and functions. This setup undermines essential checks and balances, allowing limited oversight over decisions that directly impact the director's own role and duties. This lack of separation between the director's responsibilities and the role on the board diminishes the board's ability to provide independent scrutiny and hold the director accountable, leading to potential conflicts and undermining the integrity of governance processes. Therefore, the review panel strongly urges the agency to address this long-standing issue with the Ministry of Education. The review panel believes that, after over twenty years, Law 3/2003 is in urgent need of revision, with the aim of removing the director from the board and including students and international experts in ACSUCYL's governance. Such developments are essential to establish a more independent, balanced, and collaborative governance structure.

#### *Operational independence*

The framework for the agency's evaluation processes is prescribed by legislation. Agency staff participate in working groups with other Spanish agencies to design or improve quality assurance processes. Operational independence is assured by both the law and internal legal acts. The two governing bodies - the Board of Directors and the Advisory Board - do not interfere with evaluation procedures. According to the law regulating universities, assessment committees are in charge of preparing assessment reports. ACSUCYL is responsible for selecting experts for its internal assessment committees. Complaints and appeals are handled by an independent Guarantees Committee.

The review panel found that the agency continues to rely heavily on government funding, without long-term security. The current financing arrangements significantly limit the agency's operations. Various stakeholders reported that the agency lacks both the financial and human resources to always meet deadlines, undertake additional tasks, invest in ongoing staff development, or engage more regularly in international quality assurance activities. This financial shortfall seriously hampers the agency's ability to advance, affecting its capacity to recruit new staff, initiate new projects, gain new insights, or form new partnerships. Most importantly, it obstructs the agency's ability to continuously reflect on and evaluate its work. Despite these challenges, the review panel was impressed by the expertise and commitment of the agency's current staff.

The review panel also discovered that ACSUCYL is not directly involved in the recruitment of its own staff, as the agency adheres to public regulations. A recent request to hire two new staff members is still pending approval. While acknowledging regional policies, the review panel strongly urges the agency to explore options for at least interviewing potential candidates prior to their appointment.

#### *Independence of formal outcomes*

Assessment commissions operate with full independence from both the agency's governing bodies and any other administrative or management entities. These commissions make the final assessment decisions in the processes for which they are responsible. The governing and advisory bodies have no influence over these decisions. Nevertheless, the review panel has concerns about the impartiality of the Degree Assessment Commission. This issue will be further discussed under ESG 2.6, particularly when reviewing the commission's role in reporting on assessments conducted under the European Approach for Quality Assurance of Joint Programmes. Additionally, the review panel observed that the appointment of permanent members to this standing commission could potentially impact the

independence of the assessment. Permanent members may develop close ties with stakeholders or develop biases over time, which could influence their impartiality. Their long-term involvement might lead to a situation where they are less likely to challenge the status quo or make unbiased decisions. Rotating members can introduce new ideas and viewpoints that challenge standard practice and enhance the robustness of assessments.

Given the lack of significant progress since the previous review, the review panel concludes that the core issues remain unresolved. The agency continues to demonstrate a troubling dependency on the regional government by the position of the interim director.

Despite the review panel's previous recommendations in 2019 which addressed the agency's reliance on the regional government for both the appointment of its Governing Board and funding, the SAR claims adherence to the Law and asserts independence. However, substantial challenges persist, particularly concerning budgetary and staffing constraints that remain contingent upon regional government approval. This dependency severely limits the agency's operational flexibility and autonomy.

While the review panel acknowledges that the existing legal framework might impede addressing the ongoing shortcomings, the regional government needs to be persuaded to amend the law in order to align with ESG standards. For ACSUCYL to achieve true independence, it must intensify its advocacy for legal reforms and engage in discussions with the Ministry of Education regarding necessary changes. Additionally, the agency and many of its stakeholders have differing perspectives on ACSUCYL's independence. Moreover, they do not appear to fully understand the significance and critical impact of the agency's independence. The review panel is unequivocal in its interpretation of ESG 3.3 and its implications for the agency's structure and activities regardless of the local context.

As it stands, the review panel concludes that the agency does not meet ESG 3.3, and that the significant issues related to the independence highlighted in the previous review remain unresolved. It is crucial for the agency to prioritize long-term financial security and establish a more independent operational framework to effectively resolve these ongoing challenges. Addressing these issues is essential for fostering a more robust and autonomous agency.

### **Panel recommendations**

1. Address the significant concerns regarding the agency's independence, especially given the acting director's dual role, which includes a leadership position within the General Directorate responsible for higher education. Assess the implications of this arrangement to ensure that the agency's organizational structure remains free from direct subordination to the Ministry of Education of Castilla y León.
2. Revise the organisational chart to reduce the focus on the director and exclude the director as a member of the Board of Directors, promoting a more balanced and collaborative governance structure.
3. Shift the Board of Directors' focus towards maintaining the agency's independence and prioritising quality content and strategic vision, rather than primarily concentrating on operational responsibilities.
4. Ensure formal student representation with voting rights on both the Board of Directors and the Advisory Board to enhance inclusivity and ensure diverse perspectives in decision-making.
5. Implement regular rotation or new appointments of members to ensure a diversity of thought and perspective in the Degree Assessment Commission.

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

1. Entreat the Advisory Board to adopt a more proactive attitude to increase impact.
2. Consider implementing a process for interviewing potential candidates for staff positions before their appointment.

**Panel conclusion: non-compliant.**

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

### **2020 EQAR renewal decision**

The Register Committee expects that the European Approach for Quality Assurance of Joint Programmes be analysed in full as part of ACSUCYL's next review for renewal of registration.

### **2024 EQAR decision on substantive change report**

The Committee expects that this activity [European Approach for Quality Assurance of Joint Programmes] be analysed in full as part of ACSUCYL's next review for renewal of registration.

### **2024 Terms of Reference**

Standards 2.1 to 2.7 for the following activities: European Approach for Quality Assurance of Joint Programmes.

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

Standard:

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

### **Evidence**

In the SAR, Table III's matrix outlines the connection between the internal quality assurance systems of higher education institutions (ESG Part I) and the agency's various quality assurance activities (ESG Part 2). Additionally, Table V's matrix delineates the relationship with the European Approach for Quality Assurance of Joint Programmes, highlighting this as the agency's latest initiative.

The matrix below summarises the mapping of ESG Part I standards against the agency's external quality assurance activities. Each ESG standard corresponds to one or more ACSUCYL standards. Regarding cyclical external quality assurance under ESG I.10, each activity follows a specific cycle as outlined in the relevant framework. For example, a joint programme is assessed every six years.

<b>ESG</b>	Verificati n and modificati on of bachelor's and master's degrees	Verificati on and modifica tion of PhDs	Follow- up and renewal of accredit ation of bachelor 's degrees and master's degrees	Assess ment of Artisti c Degr ees	Follo w-up and rene wal of accre ditati on of PhDs	DOCE NTIA*	ELENC HOS**	Universi ty centres	European Approach for Quality Assurance of Joint Programm es
I.1 Policy for quality assurance	8.1	8	2.2, 2.3	2.2	3	1	1	9	9
I.2 Design and approval of programmes	1, 2, 4, 6.2	1, 2	1	1.1	1	2	2	1, 2, 3, 10	2, 3
I.3 Student-centred learning, teaching and assessment	4.2, 4.3	4, 5	1.2	1.2	1, 6	2	3	5, 8	5
I.4 Student admission, progression, recognition and certification	3.1, 3.2, 8.1	3	1.2	1.2	1	NA	3	4	4
I.5 Teaching staff	5	6	3.1	3.1	4	1, 2, 3	4	6	7
I.6 Learning resources and student support	6.1, 6.3	7	3.2	3.2	5	2	5	7	6, 7
I.7 Information management	8.1	8	4	4	3, 7	2	6	8, 9	9
I.8 Public information	8.2	8	2.1	2.1	2	1, 2	8	4, 8	8
I.9 Ongoing monitoring and periodic review of programmes	8.1	8	2.2	2.2	3	2	7	8, 9	9

\* DOCENTIA programme = assessment programme for teaching performance

\*\* ELENCHOS programme = certification of the implementation of internal quality assurance systems; institutional accreditation

In follow-up to the previous review, the SAR outlines under this standard how student-centred learning, teaching, and assessment (ESG I.3) are fundamental to all the agency's procedures. It details several actions that demonstrate the agency's commitment to addressing the recommendation. Notably, the student perspective is highlighted in ACSUCYL's 2021-2025 Strategic Plan. Training and briefing sessions with external peers and university staff have also emphasised the significance of student-centred educational programmes. Additionally, ACSUCYL has published a guide on designing learning outcomes that place the student at the centre of the learning process. Finally, recent changes in legislation allow greater autonomy to the universities to implement student-centred learning, teaching, and assessment in the curricula. Consequently, this approach has been integrated into the



internal quality assurance systems at the university level. This shift is also evident in ACSUCYL's revised protocols, where attention to student-centred learning has been made more explicit in at least three of the agency's assessment procedures. During the site visit, it became evident that interviewees were less familiar with the concept and implementation of student-centred learning than suggested by the SAR and supporting documentation. The constituents primarily view student-centredness as student participation in committees and involvement in decision-making, placing less emphasis on their contributions to reflection, planning, or strategy development. Above all, a student-centred approach focuses on teaching methods, curricula, course and assessment design, and activities that are inclusive and designed around the needs, interests, and learning styles of students, emphasizing active participation and personalized learning experiences.

Specifically, regarding the European Approach for Quality Assurance of Joint Programmes, the SAR describes how this new activity aligns with the standards of Part I of the ESG. ACSUCYL references the document 'European Approach for the Quality Assessment of Joint Programmes' and the 'Protocol to Assess Joint International University Degrees in Accordance with the European Approach to Quality Assurance.' This protocol is based on the Royal Decree 822/2021, dated 28 September 2021, and is the product of collaborative efforts among all agencies in REACU. It outlines the organisation of university programmes, the procedure for their quality assurance, and the European Approach itself.

## **Analysis**

The SAR effectively demonstrates the agency's integration of internal and external quality assurance processes in alignment with the ESG standards, as presented in Table III and V. The review panel has established that each standard from ESG Part I corresponds to one or more ACSUCYL standards for external quality assurance (ESG Part II), based on the mapping grid above.

This integration also extends to the European Approach for Quality Assurance of Joint Programmes, as detailed in a separate protocol available on the ACSUCYL website. Furthermore, the review panel noted that ACSUCYL has evaluated two new joint programmes in accordance with the guidelines of the European Approach, as adapted by REACU in the specified protocol.

ACSUCYL mandates that universities develop and implement comprehensive quality assurance policies that engage both internal and external stakeholders (ESG I.1). This is evident in evaluation procedures at both the programme and institutional levels. For programme design and approval (ESG I.2), universities follow procedures that meet national and international requirements. Evaluation procedures cover student admission, progression, recognition, and certification (ESG I.4). The quality assurance of teaching staff (ESG I.5) is addressed through the agency's standards concerning academic staff or human resources. Each procedure also evaluates learning resources and student support (ESG I.6). Universities ensure effective information management (ESG I.7), which is assessed in all ACSUCYL procedures. Additionally, external assessments give due consideration to public information (ESG I.8) regarding the university's educational activities. All universities and programmes comply with ongoing monitoring and periodic reviews as per ESG I.9. Finally, the review panel has verified that for ESG I.10, cyclical external quality assurance is incorporated into all the agency's activities, accommodating different cycles for each procedure.

Additionally, the SAR clearly outlines the progress made since the previous review in student-centred learning, teaching, and assessment (ESG I.3). A student-centred approach is now integrated into both the universities' internal quality assurance and ACSUCYL's external quality assurance systems. However, despite the extensive documentation presented to the review panel indicating a robust understanding and implementation of student-centred learning, discussions with stakeholders revealed a different perspective. Many interviewees displayed a limited understanding of student-centred

principles and practices. When asked about their educational approaches, representatives from various universities admitted that the introduction and implementation of student-centred learning still required significant development. They pointed out ongoing challenges and the need for additional resources and training to effectively transition to a student-centred educational model. Furthermore, the agency's staff was less familiar with student-centred learning than expected.

The review panel has determined that ACSUCYL effectively connects the universities' internal quality assurance systems (ESG Part 1) with the agency's various external quality assurance activities, including the European Approach for Quality Assurance of Joint Programmes (ESG Part 2). It has also established that the agency has responded to the recommendation on ESG 1.3 by taking a decisive step to integrate student-centred learning into its activities, policies, and quality assurance processes. However, the review panel reiterates the importance of the student-centred learning approach and encourages the agency to swiftly move to the next phase. Therefore, ACSUCYL should provide university leaders with additional guidance on expanding educational methods that promote active student engagement in the learning process.

### **Panel recommendations**

- I. Provide leadership and guidance to broaden the institutional adoption of educational approaches that actively encourage students to take an engaged and participatory role in their own learning process.

**Panel conclusion: compliant.**

## **ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Standard:

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

### **Evidence**

The SAR provides evidence of ongoing good practices and of improvements in relation to ESG 2.2. The report testifies to the continuation of effective practices identified in previous reviews, particularly the engagement of universities in collaborative processes. For example, the practice of sharing experiences and practices with REACU has persisted, fostering a collaborative environment conducive to quality enhancement.

The SAR highlights that a significant goal for the agency is to “underscore a qualitative approach” that integrates quantitative evaluation. Such an approach should be administratively feasible and fit for purpose. The SAR suggests the agency is paying importance of not solely relying on quantitative metrics but also considering qualitative dimensions to achieve a comprehensive and effective evaluation system.

In terms of improvements in the qualitative dimension, the SAR indicates that ongoing work is being conducted, with notable additions to the training of experts and assessment committees. One of the key outcomes of this effort is the publication titled "Assessment Guide for the Verification and Substantial Modification of Curricula." This guide is highlighted as a significant transformation in their qualitative improvement initiatives. Interviews with representatives of the institutions strongly suggest

that this guide was indeed a valuable addition. The interviewees revealed that the guide enhanced the understanding of institutions about the specificities of what is expected in the process of verification or modification of curricula. This improved clarity has streamlined the processes and ensured more consistent and high-quality curricular changes. Furthermore, the guide has facilitated better communication and alignment between institutions and assessment bodies, fostering a more collaborative and efficient environment for academic programme development.

In what concerns student integration within its quality assurance processes, aligning with Standard ESG 2.2., the SAR emphasises that students have been integrated into various assessment committees, notably the Degree Assessment Commission. This was confirmed during the site visit when discussing the assessment procedure for joint degrees.

Specifically, regarding the European Approach for Quality Assurance of Joint Programmes, REACU, the Spanish network of quality assurance agencies, developed a general protocol - "Assessment protocol for joint international university degrees adopting the European approach for their quality assurance" (approved at the REACU meeting of 29 April 2022). In accordance with Royal Decree 822/2021, of 28 September, which establishes the organisation of university courses and the procedure for their quality assurance, Spanish universities may request verification of a joint programme, designed by one or more Spanish universities and one or more foreign universities (article 5.5.) leading to an official university bachelor's, master's or doctoral degree. The same Royal Decree established that universities may use the European Approach for the Quality Assurance of Joint International Programmes (articles 6 & 7). The REACU protocol includes procedures for the recognition of joint degree assessment reports and for conducting reviews. Furthermore, the European Approach for Quality Assurance of Joint Programmes document has been adapted to Spanish legislation. While the criteria and evaluation process remain unchanged, there has been a slight modification to criterion 2.4 concerning regulated professions. However, during the site visit, stakeholders reported that they had not been involved in the design of the REACU protocol.

At the moment of the site visit, ACSUCYL had issued two ex-ante positive accreditation reports on joint degree masters submitted by the University of Burgos, one in 2022 and another in 2023. During the site visit, representatives from the University of Burgos highlighted the agency's support and accessibility throughout the joint degree assessment process. Experts involved in the European Approach for Quality Assurance of Joint Programme also expressed positive views about the agency's role. They noted the existence of 'provisional' assessment reports including recommendations for improvement. However, these documents are not publicly available on the agency's website and were provided only upon the review panel's request. Further discussion on report writing will take place under ESG 2.6.

## **Analysis**

The review panel established that ACSUCYL has played a role in developing a methodology for the European Approach to Quality Assurance of Joint Programmes to fit the national context. The agency effectively utilised the collaboration and expertise of the regional network REACU. Consequently, the review panel considers the REACU protocol to be fit for purpose. However, the review panel observed that ACSUCYL's stakeholders were not directly involved in designing the protocol. This was confirmed during various meetings held during the site visit, particularly by the Student Board and Advisory Board.

When discussing stakeholders' involvement in the design and continuous improvement of the European Approach to Quality Assurance of Joint Programmes, the agency recognised that this

assessment procedure was still in a pioneering phase. In future, it intends to increase its quality improvement endeavours.

The review panel concludes that ACSUCYL's methodology for the external assessment of joint programmes fully aligns with the European Approach to Quality Assurance of Joint Programmes. Additionally, the REACU protocol for joint degrees ensures compliance with Spanish regulations. The review panel also supports the agency's intention to engage stakeholders more actively in further improving the external quality procedures related to joint programmes. In summary, the review panel finds that the agency meets the requirements of ESG 2.2.

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

- I. Continue to ensure that stakeholders are actively involved in developing and refining the methodology for the implementation of the European Approach for Quality Assurance of Joint Programmes, to ensure it is fit for purpose and aligns with their needs and expectations.

**Panel conclusion: compliant (for new or changed QA activities only).**

## **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

### **Evidence**

The SAR provides general information about the European Approach for Quality Assurance of Joint Programmes as adopted by the ministers for higher education (May 2015), without detailing the ACSUCYL's implementation of the assessment process or including documentation of the agency's authorship.

The REACU protocol for joint degrees, including the European Approach for Quality Assurance of Joint Programmes, requires consortia to jointly submit a self-evaluation report evidencing compliance with each standard, including national regulatory frameworks to contextualise the programme within each country's higher education system, and reflecting the joint nature of the programme. External assessment, including a site visit, is conducted by an expert panel of at least four members (ESG 2.4). The panel's report is based on the consortium's self-evaluation and site visit findings. Consortia receive a draft report to comment on and request amendments. If no comments are received, the draft report becomes final. The final report is reviewed and approved by the agency's Degree Assessment Commission, the competent body for degree assessment. The commission may indicate inconsistencies in the reports and is free to suggest changes to maintain consistency (ESG 2.6). The possibility of appeals and complaints (ESG 2.7), and the existence of the follow-up is also referred to.

In addition to the evidence provided under subsequent standards (ESG 2.4 to ESG 2.7), the review panel gathered more specific information about ACSUCYL's site visits conducted under the European

Approach for Quality Assurance of Joint Programmes. Both panel reports included an agenda of the site visits, which lasted 120 minutes, including breaks. The visits comprised two meetings: one with the teaching staff and another with the steering committee. During the site visit, the agency confirmed that no other stakeholders took part in the site visit. Both ex-ante reviews were online procedures and took place in 2022 and 2023.

## **Analysis**

The review panel found that the SAR lacked detailed information on ACSUCYL's implementation of the European Approach for Quality Assurance of Joint Programmes. Although the quality assurance processes for this approach are based on a well-defined and accessible external framework, the review panel anticipated a more self-critical evaluation of the implementation process.

The review panel determined that the external assessment for the European Approach for Quality Assurance of Joint Programmes follows all relevant steps including a self-evaluation report, an external assessment including a site visit by review-peers, a panel report, and follow-up procedures. However, the review panel also identified deficiencies in a number of areas.

The short duration of the site visit led the review panel to find the programme lacking in substance and depth, resulting in a shallow and inadequate assessment. The peer-review experts met only with two groups of stakeholders - teaching staff and management - excluding other potentially valuable perspectives. Although meetings with students and alumni were not expected for these ex-ante procedures, the absence of a meeting with employer or professional practitioner representatives was a missed opportunity. Additionally, an extra meeting with staff could have addressed various topics such as student-centred learning, assessment, research activities, guidance, exchange opportunities, and internships. Based on the assessment reports, none of these topics were adequately addressed during the site visit, indicating a substantial oversight. Given the multiple partners and challenges involved in joint degree programmes, a broader representation of teaching staff across partner institutions would have provided a more comprehensive assessment. When asked, the expert panel did not identify any deficiencies in the site visit programme. However, the agency acknowledged that the programme was relatively short and that including representatives from the professional field would have been beneficial. Additionally, the review panel found that the online format of the visits limited the opportunity to assess the infrastructure of at least one institution. Both site visits occurred in the post-Covid era, and there was no apparent reason for choosing the online mode. The review panel concludes that these limitations severely undermined the depth of the external review, as reflected in the overall succinctness of the assessment and the panel reports.

Additionally, these panel reports are susceptible to external changes at several stages. Initially, the panel's first report is considered a draft. Once the institution receives this draft, it can provide feedback and request corrections of any inaccuracies. However, as further discussed in ESG 2.6, the institution may also make changes that can alter the report's outcome, sometimes leading to standards initially deemed partially compliant being reclassified as fully compliant. This process is problematic because draft reports are not published, reducing transparency and potentially leading to significant changes in the final report without proper follow-up verification. As a result, stakeholders are left uninformed about any adjustments made, undermining the intended setup designed to ensure accuracy and accountability through a structured and transparent follow-up process. Additionally, there is no structured follow-up mechanism in place, as the process relies on a permanent exchange of documents rather than a formalized system to ensure that revisions are systematically addressed and tracked.

Also, there is concern about the Degree Assessment Commission's influence on the content of reports. The review panel learned that this commission could modify report contents independently

of the panel's input for consistency purposes. This practice undermines the validity of the external panel's assessments and further diminishes the transparency of the process, an issue also addressed in ESG 2.6.

The implementation of the European Approach for Quality Assurance of Joint Programmes also encounters some of the same issues found in other types of reviews. Namely, as it has been confirmed by the agency leadership, negative reports are not published on its website. During a meeting with the review panel, the agency leadership explained this situation to be caused by the fact of possible confusion, if negative ex-ante reports, causing a programme not to be launched, are published in one database with reviews or programmes that were launched. While the review panel understands this technical issue, the reasoning does not seem plausible enough to justify the lack of publication of negative reports in general. Possible solutions to this problem include setting up a separate page dedicated to negative outcomes of reviews (where it would be clearly indicated that these programmes were not launched) or adding them to aforementioned database with a clear label stating that the programme did not proceed. See also ESG 2.6.

The review panel concludes that ESG 2.3 partially meets the requirements. While all steps in the review process are included, the review panel identified numerous deficiencies that require urgent and substantial improvement. In particular, the site visit is found to be insufficient in both duration and depth, resulting in an assessment outcome that also lacks depth. Furthermore, the follow-up process lacks consistency and transparency as actions taken by the university are based on the draft report which is not the formal outcome of the assessment.

### **Panel recommendations**

1. Ensure the site visit, as part of the European Approach for Quality Assurance of Joint Programmes, includes sessions with all relevant stakeholders and allocates sufficient time to adequately address each aspect of the assessment of joint programmes.
2. Implement a robust and consistent follow-up process to monitor the formal outcomes of the external assessment for the European Approach for Quality Assurance of Joint Programmes.

**Panel conclusion: partially compliant (for new or changed QA activities only).**

## **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).

### **Evidence**

The 2019 review emphasised the need for the agency to increase efforts in recruiting international experts for the expert panels. In the SAR, the agency highlights a specific action taken in this direction, notably a seminar held in 2021, and states that "work is ongoing" in this regard. The SAR also mentions that the involvement of international experts has been "boosted" as a result of the assessment procedure for joint degrees. In the two expert panels for assessing joint degrees, there was one international expert, one of whom was a student.

ACSUCYL has introduced the European Approach for Quality Assurance of Joint Programmes as a new procedure. To date, the agency's experience in assessing joint programmes is limited to two programmes submitted by the same institution (one in 2022 and another in 2023), which have yet to be implemented into practice. Both reviews were ex-ante and had a positive outcome.

The requirements for assessment panels are laid down in the REACU protocol including the European Approach for Quality Assurance of Joint Programmes. They state that panels should be selected based on criteria such as suitability, independence, and gender balance, including at least four members with expertise in the joint programme's field, higher education quality assurance, and the relevant education systems and languages. The expert panel must include members from at least two countries involved in the consortium and at least one student.

The SAR provides evidence that the peer review process, involving external experts and student members, followed ESG standards with mandatory review steps, including an online site visit. Panel members were selected by the agency's staff and appointed by the director. The assessment reports of the two joint degrees include the expert panel composition, which consisted of four members each. Both panels included academics and students. Additionally, one staff member from another Spanish accreditation agency, experienced in the European Approach, provided relevant expertise regarding the assessment of joint programs. Both panels included representatives from two different countries. In one procedure, the student member was from abroad, while the other procedure was chaired by an international peer.

According to the SAR, all panel members are required to sign an ethical conduct document, ensuring adherence to ethical standards. Additionally, consortia have the opportunity to raise objections to the expert panel composition. No issues were reported.

Panels received support from the external panel secretary during the evaluation process. The secretary was also responsible for training her colleagues in the European Approach for Quality Assurance of Joint Programmes. The student who participated confirmed that the student's voice was valued in the review process.

## **Analysis**

The review panel established that the composition, roles, and responsibilities of external experts are in accordance with the guidelines of the European Approach for Quality Assurance of Joint Programmes. Although the expert panel composition met the minimum requirements, expanding the panels would benefit the quality of assessment and support the development of a reliable pool of (international) reviewers. The requirement for experts to declare their interests and adhere to ethical principles is also ensured. The voice of students is active in assessment panels. It remains important for ACSUCYL to prioritise the engagement of international experts in review panels.

Experts confirmed that the briefing on the European Approach for Quality Assurance of Joint Programmes was helpful. However, the training was conducted by an external individual rather than an ACSUCYL staff member. While recognizing the benefits of utilising external expertise during the initial phase of implementing the European Approach for Quality Assurance of Joint Programmes, the review panel encourages the agency to gradually build and develop internal expertise. In doing so the agency will assure long-term sustainability and self-sufficiency in managing joint programme assessments. Therefore, the agency should consider investing in training its own staff on the European Approach for Quality Assurance of Joint Programmes. The review panel will return to the issue of training under ESG 2.6 on report writing.

The review panel acknowledges that its evaluation is based on a limited number of joint degree procedures during the review period i.e. two programmes from the University of Burgos in 2022 and 2023. Consequently, the number of experts required for joint degree review panels was relatively small. It is crucial for the agency to consider the implications of a potential increase in review requests, which would necessitate a larger pool of trained experts in the European Approach. This is particularly important given one of the agency's challenges is ensuring the availability of international experts in assessment panels. As the volume of review requests grows, it will also be essential to enhance ACSUCYL staff preparation to effectively support the European Approach for Quality Assurance of Joint Programmes.

The review panel concludes that the expert teams in ACSUCYL's procedures for the European Approach for Quality Assurance of Joint Programmes generally align with the principles of this standard. Nevertheless, the agency could consider engaging more international peers in its review panels. Most importantly, it should ensure adequate training by its own staff.

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

- I. Invest in staff training on the European Approach for Quality Assurance of Joint Programmes to equip them with the skills needed to effectively provide high-quality, comprehensive support to both expert panels, especially students, and universities.

**Panel conclusion: compliant (for new or changed QA activities only).**

## **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**

Criteria and procedures for the European Approach for Quality Assurance of Joint Programmes are detailed in the REACU protocol, which is available on the ACSUCYL website in a dedicated section. The website also includes a presentation of the European Approach procedure with all the relevant European documentation, and a brief explanation of the rationale underlying this approach. It also describes the assessment procedure and the role of the Degree Assessment Commission. Finally, it published the assessment reports and decisions. These documents outline specific criteria, provide institutions with guidance for preparing the self-report, and equip external assessment panels with the tools needed for their activities.

The SAR explains that training of external experts ensures that panels pass judgments solely based on the established criteria. Furthermore, the SAR states that the agency's coordinator, responsible for managing the review process, ensures that criteria are consistently applied. More importantly, the Degree Assessment Commission is aimed at ensuring consistency in judgements in line with the standards of the European Approach for Quality Assurance of Joint Programmes.



As will be further discussed under ESG 2.6, the outcomes of the external assessment were altered during the drafting and finalising of the report. These changes pertain to both the conclusions and the recommendations, and result from improvement measures implemented between stages.

To date, no formal decisions have been taken about the two ex-ante procedures.

## Analysis

The criteria, standards, and guidelines for the European Approach for Quality Assurance of Joint Programmes are well-defined. The documentation provided by ACSUCYL, along with discussions during the on-site visit, assured the review panel that the new procedures' criteria were applied consistently in the ex-ante assessment of the two joint degrees. There are explicit criteria with comprehensive documentation available on the ACSUCYL website. This includes details on the framework and regulations, procedural documents and guidelines, assessment criteria, the composition and functions of the expert panel and the Degree Assessment Commission, and the peer-review reports.

The review panel deems the training of the expert panel essential for ensuring consistent outcomes, as it harmonises the understanding and application of criteria among all members. Standardising the assessment process enables the agency to achieve more reliable and comparable results across various joint programme procedures. Furthermore, the review panel acknowledges the critical role of a well-informed process coordinator in attaining this objective. Therefore, as stated in ESG 2.4, greater emphasis should be placed on training both staff and experts in the European Approach for Quality Assurance of Joint Programmes.

The review panel also acknowledges the crucial role of the Degree Assessment Commission in ensuring the consistent application of criteria for joint programmes. However, as noted in ESG 3.3 and ESG 2.6, the Commission's position must remain impartial at all times, with its task focused solely on maintaining consistency of judgement.

Lastly, the review panel noticed a considerable discrepancy in outcomes between the draft and final report, as will be discussed in the next standard.

**Panel conclusion: compliant (for new or changed QA activities only).**

## 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

During the period under review, ACSUCYL produced two reports following two ex-ante external assessment procedures using the European Approach for Quality Assurance of Joint Programmes. Both assessment reports are published in English and are published on the agency's website. To date, no formal decisions have been made based on these reports.

Each report adheres to a template developed by the ImpEA project, 'Facilitating Implementation of the European Approach for Quality Assurance of Joint Programmes' (2017-2020). The reports provide evidence and assessments for each standard and substandard. They open with an executive summary and conclude with recommendations and an overview of compliance. The reports do not include commendations. The annexes contain information on the composition of the expert panel, the site visit programme, and the documents reviewed by the panel.

The reports indicate that the panel's considerations and conclusions for each standard are based on the findings from the site visit and the assessment of relevant documents. The secretary drafted the report, which was then circulated to all panel members for review and feedback. Members' comments were incorporated into a final version, validated by the panel chair and subsequently by ACSUCYL's Degree Assessment Commission. The draft report was sent to the universities for comments, and a revised version was validated by the chair and the ACSUCYL's Degree Assessment Commission.

As mentioned under ESG 2.4, ACSUCYL will provide training in report writing for all panel members participating in the European Approach for Quality Assurance of Joint Programmes, with additional specialised training for the secretary making use of the online toolkit developed during the ImpEA project. The key focus areas of this training are clarity and the production of easily accessible texts. The agency's coordinator, responsible for managing the review process, ensures that the advisory reports are both evidence-based and consistent. To date, ACSUCYL has not offered such training on the European Approach for Quality Assurance of Joint Programmes. For the two Burgos procedures, the agency employed the services of an external secretary, who as a panel member also provided training to her colleagues. This was confirmed in the interview sessions.

During the site visit, the review panel gathered additional information on the operations of the Degree Assessment Commission and the various stages of report writing. The latter aspect, in particular, required further investigation as ACSUCYL procedures include a draft report (referred to in Spanish as 'un informe provisional', and in English also as an interim or provisional report) followed by a final report. This procedure is said to align with Royal Decree 822/2021, dated 28 September 2021.

The decree also stipulates that in the case of a positive outcome with conditions, the university has 15 working days to address the shortcomings to achieve a positive conclusion. Regarding the European Approach for Quality Assurance of Joint Programmes, both ACSUCYL assessments resulted in a positive outcome without any conditions. However, ACSUCYL permits universities to take follow-up actions based on the draft report, which results in a more favourable final report.

The Degree Assessment Commission plays a significant role in finalising the panel report. Generally, the Commission can suggest changes to the draft report for consistency and can add topics that require further attention, such as the surveillance of online student assessment. The chair of the external panel assessing the joint programmes according to the European Approach for Quality Assurance of Joint Programmes attends the meetings as an invitee. Regarding the joint programmes, the interviewees could not recall any major changes to the draft reports following the first meeting of the Commission. In the follow-up meeting of the Commission, the university's follow-up actions were reviewed, the panel's judgements were adjusted, and the report was finalised accordingly. This final report was drafted by ACSUCYL staff in consultation with the panel chair. Consequently, the draft report and the final report differ significantly. The final report is the document published on the agency's website.

Based on the draft report, the first ex-ante procedure of 2022 shows that one standard and several substandards are partially or substantially fulfilled, accompanied by seven recommendations and eight enhancement options. In the final report, all nine standards are considered fulfilled, with only two

recommendations adjusted slightly from their previous status as enhancement options, and no further suggestions for improvement.

In the 2023 ex-ante procedure, the draft report indicates that five standards and several substandards are either partially or substantially fulfilled and includes five recommendations and three enhancement options. In the final report, all nine standards are deemed fulfilled, with just two recommendations slightly modified and no additional suggestions for enhancement.

The SAR also references report writing in both the SWOT analysis in Table VI and stakeholder feedback in Tables VII and VIII. The SWOT analysis highlights a weakness, indicating the need for improvement in the qualitative aspects of the reports. Stakeholders expressed a preference for greater clarity and specificity in the reports, suggesting that formalities in assessments should be reduced. When asked, representatives of the University of Burgos found the reports on their two ex-ante procedures to be useful.

Finally, the ACSUCYL leadership confirmed that it does not publish negative assessment reports of ex-ante procedures. The University Register of Centres and Degrees, the Spanish national register of degrees and university centres, only permits the publication of assessment reports for registered degrees that have received a positive outcome. In response to the review panel's draft report, however, the agency provides new information and indicates that reports on joint degrees with unfavourable outcomes are publicly accessible on the EQAR website. This information contradicts what the review panel learned during the site visit. To date, there have been no negative reports for the European Approach for Quality Assurance of Joint Programmes.

## **Analysis**

The review panel examined both reports produced through ACSUCYL's coordination, adhering to the European Approach for Quality Assurance of Joint Programmes. The review panel concluded that the reports comply with the agency's protocol for joint programmes, utilising the ImpEA format and presenting their content in a clear, accessible manner.

The reports clearly indicate that the universities were given the opportunity to comment and identify factual errors. This was confirmed during the interview sessions on the site visit. Additionally, the review panel established that both reports are available on the agency's website, ensuring accessibility for interested parties and the general public.

These are the review panel's considerations based on the SAR and the underlying documents. However, near the end of the site visit, the review panel was presented with new evidence that cast a different light on the agency's compliance with ESG 2.6. Until then, the review panel had assumed the report published on the agency's website was the outcome of the external assessment. However, this turned out not to be the case. The published report is a revised version of the draft report, modified after the university was given the opportunity to address any shortcomings. It also incorporates comments from the Degree Assessment Commission. These proceedings resulted in the report now available on the agency's website.

The review panel notes that the ESG requires the agency to publish the full report resulting from the external assessment, as this report forms the basis for the university's follow-up actions. The review panel has determined that the so-called draft report meets this requirement, not the published report. Furthermore, Royal Decree 822/2021 does not provide for addressing shortcomings unless the outcome is conditionally positive, and the conditions are clearly formulated and provided in the draft report, which is not the case with the two ex-ante assessments. Therefore, the review panel finds that

the agency's procedure does not comply with the Royal Decree as none of the draft reports contained any conditions.

At an earlier stage during the ENQA procedure, the review panel found that the published reports primarily focus on compliance with the standards. The programmes under review could have benefited from a more improvement-oriented approach. Upon perusal of the so-called draft reports, the review panel found them to be more oriented toward quality enhancement. Evidence showed that most of the recommendations and suggestions for improvement had been addressed in the interim stage between the draft and published reports. In this respect, the draft report meets the spirit of the ESG, unlike the published report.

The review panel also noted significant differences in compliance with the standards of the European Approach for Quality Assurance of Joint Programmes between the draft and published reports. In the draft reports, numerous standards and substandards are only partially or substantially fulfilled, whereas in the published reports, all standards and substandards are marked as fulfilled. As discussed under ESG 2.3, these proceedings do not promote ACSUCYL's transparency in external quality assurance activities. The reports mention the process of pointing out factual errors in the draft report before finalisation, as is common practice. However, there is no mention of changing judgements or obliterating recommendations and suggestions. In this respect, the reports, and therefore the agency, lack transparency.

Upon perusal of the ACSUCYL reports for the European Approach for Quality Assurance of Joint Programmes, the review panel identified additional areas for improvement. Most notably, the review panel anticipated a thorough analysis of the evidence for each standard. However, under the heading 'Assessment', the external panel briefly reflects on the evidence, often in just one paragraph or sentence. For some standards, the analysis is missing, and the assessment merely repeats either the evidence or the standard. For standards with recommendations in the draft report, the published report briefly addresses the follow-up actions without explicitly mentioning them. Overall, the review panel found the reports lacking in a critical appraisal of the evidence. Furthermore, the evidence was primarily based on the SAR and the annexes, with additional evidence gathered during the site visit being less prominent. Additionally, the delineation between evidence and assessment (or analysis) was not always clear.

The European Approach for Quality Assurance of Joint Programmes expects the reports to pay particular attention to the distinctive features of the joint programme, especially in the conclusions and recommendations. The ACSUCYL reports would benefit from making them more programme-specific and providing greater depth in their analysis. For instance, the review panel noted the absence of an explicit reference to student-centred learning, a core principle of the ESG.

In conclusion, the review panel found that, at least for the draft reports, the agency effectively utilised the ImpEA format. However, the format is very basic and can be made more fit for purpose. The agency could learn from other reports using the European Approach for Quality Assurance of Joint Programmes. Numerous exemplary reports are available on the EQAR website, providing a more comprehensive reporting framework. In the future, the agency should distinctly separate evidence, analysis and conclusions, and include both commendations and recommendations. Most importantly, ACSUCYL must publish the full reports resulting from the external assessment. For the Burgos procedures, these reports are currently not publicly available. Also, during the site visit, the review panel discovered that ACSUCYL does not publish negative reports of ex-ante procedures, which is not in line with the expectations for an EQAR-registered agency. After the site visit, however, the

review panel received information about negative reports being published on the EQAR website, which conflicts with what it had gathered during the interviews. While there are no negative reports related to the European Approach for Quality Assurance of Joint Programmes, the review panel advises the agency to reassess its procedures and make sure to align them with the ESG. The review panel further refrains from commenting on the published reports as these are not the panel reports as envisaged in ESG 2.6.

The review panel could not confirm that all panel members receive comprehensive training in report writing for the European Approach for Quality Assurance of Joint Programmes. Upon verification, it was found that the same external and knowledgeable secretary was employed for both Burgos procedures. To address the aforementioned areas for improvement, the agency should invest in further training its staff in report writing using the European Approach for Quality Assurance of Joint Programmes (see also ESG 2.4). Additionally, more attention should be given to stakeholders' feedback, particularly regarding the clarity and specificity of the agency's reports, as noted in the SAR and the SWOT analysis. Despite these self-critical observations, the review panel found little progress was made based on the Burgos reports.

Finally, the review panel examined the role of the Degree Assessment Commission in finalising reports under the European Approach for Quality Assurance of Joint Programmes. While the commission's primary focus on consistency is beneficial to all stakeholders, as outlined in ESG 2.3, its significant steering role raises concerns about impartiality, as outlined in ESG 3.3. External quality assurance systems in the European Higher Education Area rely on reviews conducted by independent external peers, and the outcomes are published to ensure transparency and build trust. The involvement of an agency's body, like the commission, could undermine this principle. The review panel recommends that the Degree Assessment Commission should limit its adjustments to reports, focusing solely on ensuring consistency in line with the standards of the European Approach for Quality Assurance of Joint Programmes.

Given the numerous and varied deficiencies in the reporting of outcomes from reviews using the European Approach for Quality Assurance of Joint Programmes, the review panel concludes that ACSUCYL does not meet the requirements for ESG 2.6. To ensure transparency, the agency must publish the full reports from the expert panel's external assessments, including those with negative findings. Reports need to be more comprehensive, providing detailed, programme-specific information and in-depth analysis, while also considering stakeholder feedback on the clarity and specificity of the reporting. Additionally, the agency must ensure that assessment commissions remain impartial throughout the process. Lastly, further training for the agency's staff in report writing, especially for the European Approach for Quality Assurance of Joint Programmes, is necessary to address the 2019 recommendations on ESG 2.6.

### **Panel recommendations**

1. Publish the full panel report resulting from the European Approach for Quality Assurance of Joint Programmes, rather than a later version modified after implementing the recommendations.
2. Publish the full panel report resulting from the European Approach for Quality Assurance of Joint Programmes, also in cases of negative outcomes, as is expected from an EQAR-registered agency.
3. Review reports using the European Approach for Quality Assurance of Joint Programmes, as numerous exemplary reports on the EQAR website offer a more comprehensive reporting

framework. Clearly separate evidence, analysis, and conclusions, and include both commendations and recommendations in future reports.

4. Make the reports resulting from the European Approach for Quality Assurance of Joint Programmes more programme-specific, incorporate elements of student-centred learning, and ensure a balance between accountability and quality improvement.
5. Invest in further training the agency's staff in report writing using the European Approach for Quality Assurance of Joint Programmes.
6. Address stakeholders' feedback, particularly concerning the clarity and specificity of the agency's report resulting from the European Approach for Quality Assurance of Joint Programmes.
7. Ensure that the Degree Assessment Commission solely focuses on ensuring consistency in line with the standards of the European Approach for Quality Assurance of Joint Programmes.

**Panel conclusion: non-compliant (for new or changed QA activities only).**

## 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 Guarantees Commission - on the agency's website also referred to as Guarantees Committee - serves as the agency's designated authority for handling appeals and complaints across all ACSUCYL's processes, including those involving the European Approach for Quality Assurance of Joint Programmes. Its primary responsibility is examining appeals against final assessment decisions made by the agency's assessment commission and addressing complaints about procedural issues related to the assessment process. The rules governing this body are publicly available on the agency's website.

Currently, the commission consists of three members from academic, scientific and professional backgrounds who are well-acquainted with the agency's work and organisation. These members are prohibited from holding any representative positions within the universities in the Castilla y León region and from participating in agency reviews, which supports their independence. The commission does not include a student member. Additionally, the commission is assisted by a secretary and a senior technical officer from the agency, who does not have voting rights.

There are multiple ways to contact the Guarantees Commission in case such a need arises, namely via email, telephone and post.

According to the SAR, no appeals or complaints about the European Approach procedures have been filed to date, and this was confirmed during the site visit.

### Analysis

The appeals and complaints procedures for external reviews conducted under the European Approach for Quality Assurance of Joint Programmes follows the same process as for other ACSUCYL reviews.

The review panel determined that the composition and regulations of the Guarantees Commission are satisfactory. Additionally, no concerns regarding complaints and appeals procedures were raised during the review panel's meetings.

The commission's independence is assured by selecting members who have no connections to specific universities or agency procedures. Its rules are clear, understandable, and easily accessible to all interested parties. The review panel established that the Guarantees Commission can be reached through various methods. However, the contact details are not readily available on the agency's website.

The absence of complaints about procedures under the European Approach for Quality Assurance of Joint Programmes can be attributed to the fact that only two such reviews have been conducted so far, with no formal decisions made. In the review panel's opinion, this does not suggest any problems with the appeals and complaints procedure.

The review panel concludes that the agency is in compliance with ESG 2.7 with regards to reviews using the European Approach for Quality Assurance of Joint Programmes.

**Panel conclusion: compliant (for new or changed QA activities only).**

# ENHANCEMENT AREA

## 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.

ACSUCYL chose ESG 3.6 on internal quality assurance and professional conduct for further enhancement. This selection aims to provide insights on improving the agency's impact on the quality of higher education in the region and to strengthen its status as an accountability authority. The agency aims to achieve this by presenting informative and analytical reports, and engaging universities more actively.

In the SAR, the agency acknowledged facing challenges in implementing the recommendations from the 2019 review. However, the document did not clearly articulate the agency's intentions or detail any established plans. Therefore, the agency was invited to provide further information on enhancement standard ESG 3.6. This would help focus the discussions during the on-site meetings.

The review panel learned that ASCUCYL internal quality assurance system commenced in 2006, operating on the foundational principles of Plan-Do-Check-Act. From inception, the agency has conducted annual internal and external audits to ensure effective procedure execution. A quality handbook outlines the comprehensive management system, detailing all processes. Regularly reviewed by the Board of Directors, the agency's Quality Policy guides operations. Monitoring activities are facilitated by an integrated internal dashboard, providing real-time evaluation data. Oversight is conducted by the Quality Committee, which performs biannual analyses incorporating dashboard insights and meta evaluation results.

In the 2018 review of the system, an annual risk analysis was introduced. The agency proved to be committed to ensuring the effectiveness of its procedures, with a strong focus on incorporating stakeholder feedback. This approach helps to ensure the consistent and qualitative implementation of procedures.

As noted in the SAR, the last review of ACSUCYL recommended that the agency complement its process-oriented approach to internal quality assurance with a more self-critical attitude and further strengthen the focus on the impact of its work on the quality of higher education in Castilla y León. Additionally, the 2019 review panel suggested increasing efforts to ensure gender balance in its governance and advisory bodies.

The SAR lists ACSUCYL's actions since the last review, noting the 2021-2025 Strategic Plan, which explicitly aims to enhance higher education in the region. The SAR also highlights joint efforts with universities, particularly in managing the pandemic, and the collection of opinions during meta evaluation sessions regarding the indicators and information provided by the agency. Also, the gender balance in the ACSUCYL committees has improved.

The review panel noted that the SAR mentions "certain" actions without detailing them. The document also outlines "intended improvements," such as the more systematic gathering and analysis of loosely collected information. Interestingly, the agency envisions this in two phases: initially for internal improvement and subsequently to enhance sector-wide work. There is a plan to establish a working group with local universities and integrate a dashboard into the agency's operations. The process starts by identifying valid interlocutors, such as academic officers responsible for quality, official degrees, and academic organisation. It is also essential to determine which agency personnel will coordinate the



process, involving experts in higher education quality assurance. Next, key areas where the agency's activities have an impact must be pinpointed to define appropriate indicators, taking into account potential differences among universities. Finally, it is crucial to establish the frequency, analysis, and presentation methods for gathering information.

During the site visit, the review panel learned that the agency is still on the verge of implementing the 2019 recommendation, with discussions with stakeholders yet to take place. When asked about relevant topics to increase the agency's impact on higher education and enhance its quality, stakeholders mentioned student-centred learning, internationalisation, innovation, and societal needs. Especially the Advisory Board showed an interest in future involvement.

As ACSUCYL has not yet decided on a concrete way forward the review panel suggests a general four-step approach aimed at making this recommendation a reality:

#### *Step 1: Diagnosis*

The first step helps to identify and understand the issues at hand and the opportunities. It involves pooling together all relevant materials and information within ACSUCYL to produce an initial list of topics that need enhancement. This diagnostic phase should engage the agency's human resources extensively – technical and committee staff - , leveraging their expertise and insights to identify key areas for improvement. This process involves summarising points extracted from available documents, such as the meta-evaluation and reports.

#### *Step 2: Action plan*

In step 2, a comprehensive plan is developed to address the diagnosed issues. The preliminary list from step 1 is used to engage the Advisory Board, other agency's bodies, universities, students and other community stakeholders. This engagement process aims to gather their input for developing an action plan. During this second phase, it is crucial to foster collaboration between all ACSUCYL's bodies and stakeholders, and to learn from international good practice. Clearly defining who is involved and ensuring that everyone connected to the agency's activities feels represented are essential elements of this step. The action plan should be practical and produce results giving input for the next strategic plan.

#### *Step 3: Implementation*

In the next step, the action plan from step 2 is implemented after having identified the required resources (e.g., personnel, budget, tools). More specifically, this might involve adding more staff to gather both quantitative and, more importantly, qualitative information for reflection. Also, during this step, regular communication with stakeholders should be maintained. The collected data will be used to evaluate the outcomes of the implementation in the next step.

#### *Step 4: Analysis*

The final step is to analyse the collected data and act on the insights gained. This helps to understand how well the changes worked and make any needed adjustments. It is important to provide feedback to stakeholders on lessons learned and good practice. Repeating this process regularly will support ongoing improvement and keep the focus on quality enhancement. In the end, future plans can be adjusted accordingly.

This methodology provides a structured framework for problem-solving and project management, facilitating the systematic identification, planning, execution, and evaluation of actions. By adhering to these four steps, ACSUCYL can better address the 2019 recommendations and capitalise on opportunities. This approach can transform the agency's internal quality assurance and professional conduct, promoting a culture of self-criticism and continuous improvement, thereby ultimately enhancing the quality of higher education in the region.

To achieve these significant goals, the agency should invest in a dedicated oversight team to develop a comprehensive approach that includes all stakeholders at every step, also beyond the agency's official bodies. Additionally, information collection efforts should yield tangible short-term benefits for external participants. Otherwise, stakeholders may view the initiative as primarily benefiting the agency rather than the sector as a whole.

The 2024 stakeholders' survey highlights the challenge of achieving a more balanced approach to quality improvement and accountability. Once standards are met, peer reviews can shift focus to quality enhancement. Recommendations and suggestions for improving education delivery would provide tangible benefits for both students and universities. ACSUCYL may need to review and enhance its assessment procedures to ensure that its services to universities, students, and society are optimal, as envisioned under ESG 3.6. This will most certainly imply that the focus will shift to quality improvement.

Finally, stakeholder involvement is crucial for determining relevant actions. The review panel considers students the most important stakeholders in higher education, and what interests students should also interest universities. Ultimately, the shared concerns of both students and universities will guide the agency's efforts to enhance the quality of higher education in Castilla y León.

## ADDITIONAL OBSERVATIONS

### HUMAN RESOURCES

The review panel noted that part of ACSUCYL's strength comes from its experienced and dedicated staff, whose professionalism and commitment drive continuous improvement. External stakeholders frequently recognize and appreciate the staff's readiness and willingness to help.

However, on numerous occasions during the site visit, various stakeholders also mentioned the shortage of ACSUCYL staff. Both the SAR and the SWOT analysis repeatedly refer to this lack of staff, noting its impact on the agency's daily work. Also, this shortage significantly hampers further development and new initiatives. Considering the agency's ambition to have a greater impact on the quality of higher education in the region, as discussed under ESG 3.6, it is crucial to address the current staffing levels and adjust them to meet future needs.

The review panel established that for additional human resources, the agency is entirely dependent on the regional government. During the site visit, the review panel learned that a request to increase the current staff by two to three new members is currently under review by the Ministry of Education. The review panel firmly believes that additional human resources are essential for ACSUCYL to continue ensuring the quality of higher education in the region efficiently and effectively, and to fully meet the expectations of its stakeholders. Therefore, the review panel fully supports this request.

### FORMAL BODIES

ACSUCYL relies on various bodies for its quality assurance processes, including the Board of Directors, the Advisory Board and the Student Board (both consultative bodies), and four assessment commissions. While these bodies and commissions contribute to the agency's smooth operation, they primarily handle routine administrative matters and recurring topics such as budget, staff remuneration, accreditation decisions, and annual reports. Reflection on the agency's work and improvement strategies are not typically prioritised in their agendas. Representatives from the consultative bodies have confirmed that they tend to be reactive rather than proactive. They simply respond to issues brought forward by the agency's leadership.

ACSUCYL would benefit from a more qualitative and proactive approach from all these bodies. In particular, student representatives need to increase their efforts to effect change, even if it challenges the local context. Currently, student representation would do well to explore good practice in an international context to develop a more critical and assertive attitude. It is encouraging that the Advisory Board has shown interest in actively contributing to the follow-up of the present review. By fostering a more strategic and reflective culture among all bodies involved, ACSUCYL can enhance its effectiveness and better address the evolving needs of higher education in the region. Strengthening these collaborative efforts will be crucial for achieving long-term improvements and maintaining high standards of quality assurance.

### REPORTS

During the review of ESG 2.6 for the European Approach for Quality Assurance of Joint Programmes, it became clear only during the interviews that ACSUCYL permits universities to address recommendations in the draft report of the external assessment panel, a detail that was not mentioned in the SAR. This practice which can lead to a more favourable final report, and the review

panel found that this is a standard practice for ACSUCYL. To enhance transparency and trust in the assessment process, the panel strongly recommends that the agency publish the full reports from all external assessment procedures in their original form, rather than revised versions altered after the implementation of recommendations.

# CONCLUSION

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

### Judgements

ESG 3.1 Activities, policy and processes for quality assurance	partially compliant
ESG 3.3 Independence	non-compliant
ESG 2.1 Consideration of internal quality assurance	compliant
ESG 2.2 Designing methodologies fit for purpose	compliant
ESG 2.3 Implementing processes	partially compliant
ESG 2.4 Peer-review experts	compliant
ESG 2.5 Criteria for outcomes	compliant
ESG 2.6 Reporting	non-compliant
ESG 2.7 Complaints and appeals	compliant

### Recommendations

1. Enhance students' involvement in governance by providing more opportunities for active participation and ensuring their voices are heard in decision-making processes.
2. To maximise impact, actively facilitate and stimulate student involvement by creating engaging opportunities and fostering clear, open communication.
3. Address the significant concerns regarding the agency's independence, especially given the acting director's dual role, which includes a leadership position within the General Directorate responsible for higher education. Assess the implications of this arrangement to ensure that the agency's organizational structure remains free from direct subordination to the Ministry of Education of Castilla y León.
4. Revise the organisational chart to reduce the focus on the director and exclude the director as a member of the Board of Directors, promoting a more balanced and collaborative governance structure.
5. Shift the Board of Directors' focus towards maintaining the agency's independence and prioritising quality content and strategic vision, rather than primarily concentrating on operational responsibilities.
6. Ensure formal student representation with voting rights on both the Board of Directors and the Advisory Board to enhance inclusivity and ensure diverse perspectives in decision-making.
7. Implement regular rotation or new appointments of members to ensure a diversity of thought and perspective in the Degree Assessment Commission.
8. Provide leadership and guidance to broaden the institutional adoption of educational approaches that actively encourage students to take an engaged and participatory role in their own learning process.
9. Ensure the site visit, as part of the European Approach for Quality Assurance of Joint Programmes, includes sessions with all relevant stakeholders and allocates sufficient time to adequately address each aspect of the assessment of joint programmes.

10. Implement a robust and consistent follow-up process to monitor the formal outcomes of the external assessment for the European Approach for Quality Assurance of Joint Programmes.
11. Publish the full panel report resulting from the European Approach for Quality Assurance of Joint Programmes, rather than a later version modified after implementing the recommendations.
12. Publish the full panel report resulting from the European Approach for Quality Assurance of Joint Programmes, also in cases of negative outcomes, as is expected from an EQAR-registered agency.
13. Review reports using the European Approach for Quality Assurance of Joint Programmes, as numerous exemplary reports on the EQAR website offer a more comprehensive reporting framework. Clearly separate evidence, analysis, and conclusions, and include both commendations and recommendations in future reports.
14. Make the reports resulting from the European Approach for Quality Assurance of Joint Programmes more programme-specific, incorporate elements of student-centred learning, and ensure a balance between accountability and quality improvement.
15. Invest in further training the agency's staff in report writing using the European Approach for Quality Assurance of Joint Programmes.
16. Address stakeholders' feedback, particularly concerning the clarity and specificity of the agency's report resulting from the European Approach for Quality Assurance of Joint Programmes.
17. Ensure that the Degree Assessment Commission solely focuses on ensuring consistency in line with the standards of the European Approach for Quality Assurance of Joint Programmes.

In light of the documentary and oral evidence considered by it, the review panel considers that, in the performance of its functions, ACSUCYL does not comply with the ESG. The agency is recommended to take appropriate action to achieve compliance in all standards at the earliest opportunity.

## **SUGGESTIONS FOR FURTHER IMPROVEMENT**

1. Consider establishing a separate section on the agency's website dedicated to student-related matters to enhance accessibility and encourage greater student participation in the agency's governance and activities.
2. Entreat the Advisory Board to adopt a more proactive attitude to increase impact.
3. Consider implementing a process for interviewing potential candidates for staff positions before their appointment.
4. Continue to ensure that stakeholders are actively involved in developing and refining the methodology for the implementation of the European Approach for Quality Assurance of Joint Programmes, to ensure it is fit for purpose and aligns with their needs and expectations.
5. Invest in staff training on the European Approach for Quality Assurance of Joint Programmes to equip them with the skills needed to effectively provide high-quality, comprehensive support to both expert panels, especially students, and universities.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

### Schedule for ENQA targeted review site visit ACSUCYL

Valladolid, 9-11 July 2024

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
1	13.06.2024 12.00 – 13.30 90 min 01.07.2024 17.00 – 18.30 90 min	Review panel's kick-off and follow-up meetings, and preparations for site visit		
2	18.06.2024 17.00 - 18.30 90 min	An online clarification meeting with the ACSUCYL's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	<ul style="list-style-type: none"><li>ACSUCYL's resource person</li></ul>	
Monday 08.07.2024 – Day 0, pre-visit				

3	15.00 - 16.00 60 min	Review panel's pre-visit meeting and preparations for day 1		
4	16.15 - 17.00	A pre-visit meeting to clarify any remaining questions after the online clarifications meeting	<ul style="list-style-type: none"> <li>• ACSUCYL's acting director</li> <li>• ACSUCYL's resource person</li> </ul>	

\* Participants joining the meeting online

**Tuesday 09.07.2024 – Day 1**



	08.30 - 09.00 30 min	Review panel's private meeting		
5	09.00 - 09.45 45 min	Meeting with the ACSUCYL director and representatives of the Quality Committee	<ul style="list-style-type: none"> <li>• ACSUCYL's acting director</li> <li>• ACSUCYL's staff member responsible for Assessing Accreditation Centres and Secretary of the Student Board</li> <li>• ACSUCYL's staff member responsible for Finances</li> <li>• ACSUCYL's staff member responsible for IT</li> </ul>	
	09.45 - 10.00 15 min	Review panel's private discussion		
6	10.00 - 10.45 45 min	Meeting with the ACSUCYL Board of Directors	<ul style="list-style-type: none"> <li>• Member of the Board of Directors, academic. University of Burgos</li> <li>• Member of the Board of Directors, Head of Service, Ministry of Education</li> <li>• Member and secretary of the Board of Directors</li> </ul>	
	10.45 - 11.00 15 min	Review panel's private discussion		

7	11.00 - 11.45 45 min	Meeting with ACSUCYL staff/representatives on the agency's self-selected enhancement area ESG 3.6	<ul style="list-style-type: none"> <li>• ACSUCYL's acting director</li> <li>• ACSUCYL's resource person and responsible for Assessing Doctoral Degrees and European Approach</li> <li>• Academic, Pontifical University of Salamanca</li> </ul>	
	11.45 - 13.00 75 min	Lunch (review panel only)		
8	13.00 - 13.45 45 min	Meeting with ACSUCYL key staff in charge of external QA activities including the European approach for quality assurance of joint programmes	<ul style="list-style-type: none"> <li>• ACSUCYL's staff member responsible for Assessing Accreditation Centres and Secretary of the Student Board</li> <li>• ACSUCYL's staff member responsible for Assessing Degrees and Institutional Accreditation</li> <li>• ACSUCYL's staff member responsible for Assessing Doctoral Degrees and European Approach</li> <li>• ACSUCYL's administrative staff member</li> <li>• ACSUCYL's staff member, secretary of the Guarantees Commission</li> </ul>	
	13.45 - 14.00 15 min	Review panel's private discussion		
9	14.00 - 14.45 45 min	Meeting with the ACSUCYL Student Board	<ul style="list-style-type: none"> <li>• Member of the Student Board, University of Salamanca*</li> <li>• Member of the Student Board, University of Valladolid*</li> <li>• Member of the Student Board, University of Valladolid</li> <li>• Member of the Student Board, Isabel I University*</li> </ul>	
	14.45 - 15.00 15 min	Review panel's private discussion		

10	15.00 - 15.45 45 min	Meeting with the ACSUCYL Advisory Board	<ul style="list-style-type: none"> <li>• Chair of the Advisory Board, former Regional Ministry of Educación*</li> <li>• Secretary of the Advisory Board, Unileo and Barali Enterprises</li> <li>• Academic member of the Advisory Board, UNED</li> </ul>	
	15.45 - 16.00 15 min	Review panel's private discussion		

11	16.00 - 17.00 60 min	Meeting with representatives from the reviewers' pool (different processes, also with reference to the European approach for quality assurance of joint programmes)	<ul style="list-style-type: none"> <li>• Peer-review expert, professional, degrees*</li> <li>• Peer-review expert, academic &amp; degrees*</li> <li>• Peer-review expert, international and academic chair, European Approach*</li> <li>• Peer-review expert and panel secretary, European Approach</li> <li>• Peer-review expert, professional, degrees &amp; European Approach</li> <li>• Student peer-review expert, European Approach &amp; degrees*</li> <li>• Student peer-review expert, degrees</li> </ul>	
12	17.00- 18.00 60 min	Wrap-up meeting among review panel members and preparations for day 2		
	21.00	Dinner (review panel only)		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
<b>Wednesday 10.07.2024 – Day 2</b>				
	09.00 - 09.30 60 min	Review panel's private meeting		
13	09.30 - 10.15 45 min	Meeting with ministry representatives	<ul style="list-style-type: none"> <li>• General Secretary of the Ministry of Education</li> <li>• General Director of Vocational Training and Special Regime</li> </ul>	
	10.15 - 10.30 15 min	Review panel's private discussion		
14	10.30 - 11.15 45 min	Meeting with heads of some reviewed HEIs representatives (private and public HEIs, also with reference to the European approach for quality assurance of joint programmes)	Representatives of the following HEIs: <ul style="list-style-type: none"> <li>• University of León</li> <li>• IE University</li> <li>• Isabel I University</li> <li>• Pontifical University of Salamanca</li> <li>• University of Valladolid</li> <li>• University of Burgos</li> <li>• Miguel de Cervantes European University</li> </ul>	
	11.15 - 11.30 15 min	Review panel's private discussion		

15	11.30 - 12.15 45 min	Meeting with quality assurance officers of HEIs (private and public HEIs, also with reference to the European approach for quality assurance of joint programmes)	Representatives of the following HEIs: <ul style="list-style-type: none"> <li>• University of Burgos, European Approach*</li> <li>• University of Burgos</li> <li>• University of Salamanca</li> <li>• University of Valladolid</li> <li>• University of León</li> <li>• Santa Teresa de Jesús Catholic University of Ávila</li> <li>• Pontifical University of Salamanca</li> </ul>	
	12.15 - 13.30 75 min	Lunch (review panel only)		
16	13.30 - 14.15 45 min	Meeting with the representatives of ACSUCYL's assessment bodies, also with reference to the European approach for quality assurance of joint programmes	<ul style="list-style-type: none"> <li>• Member and secretary of the Degrees Assessment Commission, academic</li> <li>• Student member of the Degrees Assessment Commission*</li> <li>• Student member of the Degrees Assessment Commission</li> <li>• Member of the Degrees Assessment Commission, professional*</li> <li>• Member of the Institutional Quality Assessment Commission, academic</li> <li>• Panel President, academic, European Approach*</li> </ul>	
	14.15 - 14.30 15 min	Review panel's private discussion		

17	14.30 - 15.15 45 min	Meeting with directors and academics with reference to the European approach for quality assurance of joint programmes	<ul style="list-style-type: none"> <li>• Master's Coordinator. University of Burgos</li> <li>• Master's Coordinator. University of Burgos*</li> <li>• Academic, Instituto Politécnico de Leiria*</li> <li>• Academic, Turun Ammattikorkeakoulu - Turku University Applied of Applied Sciences*</li> <li>• Academic, Instituto Politécnico de Coimbra*</li> <li>• Academic, Universidade Federal da Bahia*</li> <li>• Academic, Universitatea de Vest din Timișoara - West University of Timisoara*</li> </ul>	
18	15.15 - 18.30	Wrap-up meeting among review panel members: preparation for day 3 and provisional conclusions		
	21.00	Dinner (review panel only)		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
<b>Thursday 11.07.2024 – Day 3, Conclusions</b>				
19	09.30 - 10.00 60 min	Meeting among review panel members to agree on final issues to clarify		
20	10.00 - 11.00 60 min	Meeting with the ACSUCYL director to clarify any pending issues	<ul style="list-style-type: none"> <li>• ACSUCYL's acting director</li> <li>• ACSUCYL's resource person</li> </ul>	
21	11.00 - 12.15 90 min	Private meeting between review panel members to agree on the main findings		
	12.15 - 12.45 30 min	Final de-briefing meeting with staff and director of the agency to inform about preliminary findings	<ul style="list-style-type: none"> <li>• ACSUCYL's acting director</li> <li>• ACSUCYL's staff</li> </ul>	
	12.45 - 13.30 60 min	Lunch (review panel only)		

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

# Targeted review of Quality Assurance Agency for the University System in Castilla y Leon (ACSUCYL) against the ESG

## Annex I: TERMS OF REFERENCE

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

January 2024

### 1. Background

Quality Assurance Agency for the University System in Castilla y Leon-ACSUCYL has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Quality Assurance Agency for the University System in Castilla y Leon-ACSUCYL has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2010 and is applying for renewal of ENQA membership.

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

- Verification of official degrees (ex-ante accreditation) / modification
- Follow-up of official degrees
- Renewal of accreditation of official degrees (ex-post accreditation)
- Assessment of Higher Art Master Programmes (ex-ante and ex-post evaluation)
- European Approach for QA of Joint Programmes
- Institutional accreditation and Certification of the implementation of the internal quality assurance system (ELENCHOS Programme)
- Teaching performance assessment programme (DOCENTIA Programme)
- Evaluation to create, recognize, modify or withdraw university centres



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

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

- Assessment programmes evaluating research
- Assessment programmes evaluating teaching staff

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

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

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

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

### **2.1 Focus areas**

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

- a. 3.1 Activities, policy and processes for quality assurance
  - Consider, how the agency has addressed the limited involvement of students in its governance and work, and whether relevant changes have been made.
- b. 3.3 Independence
  - Consider how the agency ensures its independence from the regional Government, in particular, appointment of members in the Governing Board by the regional minister, approvals and hiring of new staff and the annual approval of its budget by the regional Government as well as financial and staffing decisions.

B) Standards 2.1 to 2.7 for the following activities:

- a. European Approach for QA of Joint Programmes<sup>4</sup>

C) Standards affected by other types of substantive changes:

- a. N/A

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<sup>4</sup> [See Decision on Substantive Change Report from 2024-01-25](#)

- D) ESG 2.1 Consideration of internal quality assurance;
- E) Selected enhancement area: ESG 3.6 Internal quality assurance and professional conduct
- F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

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

Should any substantive changes occur in ACSUCYL between now and the review (e.g., organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

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

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

The evaluation procedure consists of the following steps:

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

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

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

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

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

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

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

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

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

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

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

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

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

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;

- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

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

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

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

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

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

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

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

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

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

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

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

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

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR<sup>5</sup>.

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

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If ACSUCYL chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by ACSUCYL and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be

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<sup>5</sup> See here: [https://www.eqar.eu/assets/uploads/2020/09/RC\\_I2\\_I\\_UseAndInterpretationOfTheESG\\_v3\\_0.pdf](https://www.eqar.eu/assets/uploads/2020/09/RC_I2_I_UseAndInterpretationOfTheESG_v3_0.pdf)

finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to ACSUCYL the [Declaration of Honour](#) together with the final report.

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

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

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

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

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

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

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

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not

renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

## 6. Indicative schedule of the review

Agreement on Terms of Reference	January 2024
Appointment of review panel members	February 2024
Self-assessment report (SAR) completed by ACSUCYL	29 April 2024
Screening of SAR by ENQA Review Coordinator	April 2024
Preparation of site visit schedule and indicative timetable	May 2024
Briefing of review panel members	April 2024
Review panel site visit	End-June or early July 2024
Submission of the draft review report to ENQA Review Coordinator	August 2024
Factual check of the review report by the ACSUCYL	September 2024
Statement of ACSUCYL to review panel (if applicable)	September 2024
Submission of review report to ENQA	End-September 2024
Validation of the review report by the Agency Review Committee	October 2024
EQAR Register Committee meeting and decision on the application by ACSUCYL	Autumn/2024
Decision on ENQA membership by the ENQA Board	Autumn/2024

## ANNEX 3: GLOSSARY

ACSUCYL	Quality Assurance Agency for the University System in Castilla y León
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
ESU	The European Students' Union
EUA	European University Association
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
REACU	Spanish Network of University Quality Agencies
SWOT	strengths, weaknesses, opportunities, and threats
SAR	self-assessment report



## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY ACSUCYL

- 2024 Self-Assessment Report
- Enhancement Standard 3.6
- Strategic Plan 2021-2015
- Quality Policy, 28 April 2017
- Board of Directors and Advisory Board, Law 3/2003, 28 March 2003, on Universities of Castilla y León
- Rules Governing the Internal Functioning of ACSUCYL's Student Board, April 2017
- Propuesta del director de la agencia para la calidad del sistema universitario de Castilla y León sobre la relación de puestos de trabajo de la agencia para el año 2019
- Real Decreto 822/2021, de 28 de septiembre, por el que se establece la organización de las enseñanzas universitarias y del procedimiento de aseguramiento de su calidad
- Assessment Handbook, 2021 edition
- Assessment Protocol for Joint International University Degrees Adopting the European Approach for their Quality Assurance "European Approach for Quality Assurance of Joint Programmes", REACU, 22 April 2022
- ELENCHOS Programme, Framework, March 2023 edition
- Renovación de la acreditación títulos de grado y master, Proceso General de evaluación, 23 October 2023
- Information about international experts 2019-2024
- Certificates on student representation in the Degrees Assessment Commission, October 2021
- Consejo de estudiantes, Composición actualizada a fecha 5 de septiembre de 2023
- Current student representation in the various ACSUCYL committees, July 2024
- Assessment report of the Erasmus Mundus Joint Master's Degree Programme on the Integrated STEAM Education (MASTED), draft report, November 2022
- Assessment report of the Erasmus Mundus Joint Master's Degree Programme on the Integrated STEAM Education (MASTED), final report, December 2022
- Assessment report of the Erasmus Mundus Joint Master Degree Programme in Computer Science for the Human-centric and Sustainable Industry (EMaCS), draft report, December 2023
- Assessment report of the Erasmus Mundus Joint Master Degree Programme in Computer Science for the Human-centric and Sustainable Industry (EMaCS), final report, January 2024

### OTHER SOURCES USED BY THE REVIEW PANEL

- Guidelines for ENQA Targeted Reviews, 27 October 2022
- European Approach for Quality Assurance of Joint Programmes, October 2014, approved by EHEA ministers in May 2015
- 2019 ENQA Review report ACSUCYL
- ENQA reconfirmation of membership of ACSUCYL in ENQA, 3 December 2019
- EQAR Approval of the Application by ACSUCYL for Renewal of Inclusion on the Register, 22 June 2020
- ENQA's approval of ACSUCYL's follow-up report to the 2019 ENQA review, 8 March 2022
- EQAR's decision on the Substantive Change Report by ACSUCYL, 25 January 2024

- ACSUCYL website
- ENQA website
- EQAR website

## ENQA TARGETED REVIEW 2025

THIS REPORT presents findings of the ENQA Targeted Review of the Quality Assurance Agency for the University System in Castilla y León (ACSUCYL), undertaken in 2024.