
ENQA AGENCY REVIEW: COMMISSION FOR ACCREDITATION AND QUALITY ASSURANCE (CAQA)

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22 FEBRUARY 2018

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EXECUTIVE SUMMARY

This report analyses the compliance of the Commission for Accreditation and Quality Assurance (CAQA) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an ENQA-coordinated external review conducted between March 2017 and February 2018, with a site visit to Belgrade, Serbia, between 16 and 18 October 2017. This is the second external review of CAQA. CAQA has been a full member of ENQA since 2013 and has been listed in EQAR since 2014. It is now applying for renewal of its ENQA membership and EQAR registration.

CAQA was established in 2005 and currently operates on the basis of the 2005 Law on Higher Education which introduced the principles of the Bologna Process into higher education in Serbia. It conducts initial and periodic accreditation reviews of higher education institutions and programmes to ensure compliance with minimum requirements, and institutional-level audits aimed at quality enhancement. All processes are mandatory for institutions, with their frequency predetermined by law. CAQA is funded from accreditation fees paid by higher education institutions and the State budget.

CAQA is quite unique in terms of its structure and overall design of its processes, largely predefined by law. Its 17 members share among themselves tasks related to management (with the President and Vice-President taking overall responsibility in this respect) and daily work, and to external quality assurance, and are supported by a small secretariat. As the management tasks are not separated from those in external quality assurance, resources can hardly be used most efficiently, and with the heavy workload related to the latter, there are, in practice, no human resource reserves left for the former. In external quality assurance processes, all CAQA members are extensively involved as experts (from analysis of documentation to the drafting of reports as the basis for decisions) and, at the same time, are the decision-making body. External experts either only assess compliance with the standards based on documentation (academic experts whose identity should be protected, as required by law) or only participate in site visits together with CAQA members (students and employers). This has a bearing on the extent to which CAQA may comply with some of the ESG (design and implementation of processes, peer-review experts and reporting) which are based on a 'model' where a central role is played by a group of external experts and the agency takes decisions based on reports written by them.

Regardless of this, the Law on Higher Education provides CAQA with a clear legal basis for its regular external quality assurance activities and for outcomes of its processes to be recognised by its stakeholders. CAQA has gradually gained a reputation of a trustworthy institution and its work is appreciated by the stakeholders. While students and employers are not represented in its governance and, overall, stakeholder involvement in external quality assurance is limited, all relevant stakeholders contribute to the methodologies for CAQA's processes insofar as it is possible within the framework set by law. Adequate financial resources are, in principle, available for CAQA's activities. However, regulations for the public sector, coupled with CAQA's dependence on administrative and financial services provided by the Ministry of Education, to a large extent predetermined by law, do not allow it to make effective use of the funding available; as a result of this and in combination with issues resulting from CAQA's structure, the human resources actually available are too limited for further development activities. Despite that, CAQA has produced a number of valuable thematic analyses; in the future, they would need to have a broader focus, covering not only quantitative aspects but also quality and internal quality assurance in institutions. Internal quality assurance within CAQA is underdeveloped. The various existing constraints impose limitations on CAQA's organisational or operational independence but do not undermine its autonomy in decision-making.

CAQA's external quality assurance processes and decisions are based on published standards and procedures, though some documents would benefit from amending for full clarity, transparency and / or consistency. The standards for CAQA's processes address Part 1 ESG quite comprehensively. At the same time, more consideration would need to be given to the effectiveness of internal quality assurance, and to encouraging institutions to take the primary responsibility for quality; this would also help CAQA to ensure that its processes are better fit for the purpose of quality enhancement. Aside from the 'systemic issue' inherent in the overall design of CAQA's processes highlighted above and its implications for a number of Part 2 ESG, there is space for some specific improvements in external quality assurance; for example, site visits to be included as part of all periodic programme accreditation reviews, regular training to be provided to experts (already addressed by a recent CAQA regulation) and greater involvement of international experts. CAQA has, in practice, a consistent approach to its decision-making. Its reports, which, overall, follow the relevant ESG, are published, except those produced as part of accreditation of new institutions and their programmes. A procedure for complaints would need to be put in place, and the appeals arrangements would need to be more transparent, with a separate body to be established.

The review panel has found CAQA to be fully compliant with ESG 3.2 and 3.7; substantially compliant with ESG 3.3, 3.4, 3.5, 2.1 and 2.5; and partially compliant with ESG 3.1, 3.6, 2.2, 2.3, 2.4, 2.6 and 2.7. It has made recommendations under most of the ESG and a number of suggestions for CAQA's further development. Despite the 'partially compliant' judgments under seven ESG, the panel concludes that CAQA is, overall, in substantial compliance with the ESG. This is mainly because the 'systemic issue' of CAQA members performing a double role as key experts and the decision-making body in external quality assurance processes not only predetermines the level of compliance with ESG 2.2, but also – given the limited involvement of external experts – 'carries over' its implications for compliance to ESG 2.3, 2.4 and 2.6; otherwise, the panel would have considered CAQA to be substantially compliant with these three ESG. Additionally, the same 'systemic issue' affects, though to a lesser extent, the panel's judgements under ESG 3.1, 3.5 and 3.6 insofar as CAQA's structure, more suitable for a committee of experts than a fully-fledged agency, imposes some limitations on effective performance of its management functions.

A new Law on Higher Education passed by the National Assembly in Serbia in October 2017 will establish a new National Accreditation Body, incorporating CAQA, within a year, thus changing the operational framework for the latter. Revised standards for CAQA's external quality processes will be applied as from 2018. In view of the prospective changes, the panel considers that CAQA could be requested by the ENQA Board to submit a follow-up report when all the new arrangements are fully in place.

INTRODUCTION

This report analyses the compliance of the Commission for Accreditation and Quality Assurance (CAQA) (*Komisija za akreditaciju i proveru kvaliteta, KAPK*) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in a twelve-month period from March 2017 to February 2018.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. CAQA underwent its first review in 2012 and was granted full membership of ENQA in 2013. In 2014, it was entered on the European Quality Assurance Register (EQAR). The present review has been conducted as part of CAQA's application to confirm its ENQA membership and renew its EQAR registration.

The review addresses all of CAQA's external quality assurance processes, including initial accreditation, accreditation of higher education institutions and programmes and audits (as they are identified in the Terms of Reference for the review).

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

The report analyses ESG compliance of the arrangements which were in place at the time of the review, based on the national legislation and CAQA's internal regulations still in force then. A new Law on Higher Education which will establish a new accreditation body, incorporating CAQA, within a year was passed by the National Assembly in Serbia in October 2017. The panel has briefly outlined the main prospective changes in the introductory section and has taken them into consideration in its suggestions for CAQA's further development. In the context of the new Law, the panel is aware that a number of its recommendations may either be no longer applicable soon or may be addressed only for the new quality assurance body.

MAIN FINDINGS OF THE 2012 REVIEW

The 2012 review panel found CAQA:

- fully compliant with 2005 ESG 3.2 (Official status), 3.3 (Activities), 2.1 (Use of internal quality assurance), 2.5 (Reporting) and 2.7 (Periodic reviews);
- substantially compliant with 2005 ESG 3.1 (Use of external quality assurance procedures), 3.6 (Independence), 3.7 (External quality assurance criteria and processes), 2.2 (Development of external quality assurance processes), 2.3 (Criteria for decisions) and 2.4 (Processes fit for purpose);
- partially compliant with 2005 ESG 3.4 (Resources), 3.5 (Mission statement), 3.8 (Accountability procedures) and 2.6 (Follow-up procedures);
- non-compliant with 2005 ESG 2.8 (System-wide analyses).

The panel made recommendations under most of the 2005 ESG; they are included and addressed under the corresponding 2015 ESG in the present report.

REVIEW PROCESS

The 2017 external review of CAQA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of CAQA was appointed by ENQA and composed of the following members:

- Achim Hopbach (Chair, ENQA nominee), Managing Director, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria;
- Ewa Kolanowska (Secretary, ENQA nominee), freelance higher education and quality assurance consultant, Poland;
- Danutė Rasimavičienė (EURASHE nominee), Dean, Faculty of Business Management, Vilniaus Kolegija / University of Applied Sciences, Lithuania;
- Marija Vasilevska (ESU nominee), Master student, Iustinianus Primus Faculty of Law, Ss. Cyril and Methodius University in Skopje, Macedonia.

CAQA produced a self-assessment report which provided a substantial portion of the evidence that the panel used to draw its conclusions. At the panel's request, CAQA provided additional documents, including its 2013-2017 Strategy, and clarifications in writing (hereafter referred to as Pre-visit clarifications). On this basis, the panel identified the lines of enquiry for the review. An ENQA telephone briefing was held for the panel to discuss the review process. The panel conducted a site visit to validate CAQA's self-assessment and clarify points at issue. All decisions of the panel on CAQA's compliance with the ESG were taken by consensus. The panel drafted a report based on the self-assessment report, additional documents received and findings from the site visit. The draft was sent to the ENQA coordinator for pre-screening and, subsequently, to CAQA for a factual accuracy check. The final report was submitted to ENQA. The panel confirms that it had access to all documents and people it wished to consult throughout the review. The ENQA coordinator and the CAQA liaison person provided administrative support to the panel; the ENQA coordinator also offered clarifications on the review process and other issues when sought by the panel.

Self-assessment report

CAQA's self-assessment relied to a large extent on inputs from the 2012 self-assessment since, as explained to the panel, the circumstances had not changed much since then. To collect external feedback, CAQA conducted surveys among higher education institutions and academic experts in 2017. They were based, however, on the same methodology as regular surveys which focus on CAQA's external quality assurance processes; thus, findings could be relevant to only some of the ESG. Students or employers were not consulted as part of the self-assessment. Within CAQA, the process involved mainly three of its members as the self-assessment working group, though administrative staff provided inputs and findings were discussed at a CAQA meeting. Overall, in the panel's view, the self-assessment process did not involve a thorough review of CAQA's activities against the 2015 ESG, and it was rather limited in scope, as acknowledged by CAQA, and in terms of stakeholder engagement. The panel is aware, however, that CAQA's engagement in discussions on the new Law on Higher Education during the self-assessment period put a heavy strain on its human resources, and uncertainty about the future was not a particularly helpful factor in self-analysis.

The SAR followed the structure recommended by ENQA. It was comprehensive and, overall, informative with regard to the national framework for higher education and quality assurance and CAQA's activities. Nonetheless, while the introductory sections described in detail CAQA's external quality assurance processes and methodologies, some procedures and practices had to be further clarified before the site visit. The ESG sections reflected some critical self-analysis, identifying a number of aspects of the ESG

where further change was still needed to ensure full compliance. They would have benefited, however, from a more thorough self-assessment of compliance, in particular, with regard to the ESG Part 2 standards and guidelines. The analysis also centred mainly around external, in particular legislative, constraints which limited progress or development prospects and the issues to be resolved by the new Law on Higher Education. Less consideration was given to improvements that could have been made within the existing framework. For further comments, see the ESG sections.

Site visit

The site visit programme was prepared in cooperation with the CAQA liaison person. On the day preceding the visit, the panel had a discussion on the Serbian higher education and quality assurance system with the CAQA resource person, and an internal preparatory meeting. The visit took place between 16 and 18 October 2017. The panel interviewed all key stakeholders, including the SAR working group, CAQA's members and staff, academic experts, students and employers involved in its processes, and representatives of higher education institutions and their conferences, students' conferences and the national authorities. Except for a Skype interview with a slightly delayed start, the visit was well organised. The meetings were conducted efficiently, despite interpreting provided in most meetings. At the end of the visit, the panel had an internal meeting to agree conclusions from the review and a debriefing for CAQA on the main findings. For details, see the site visit agenda in Annex 1.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM IN SERBIA

HIGHER EDUCATION SYSTEM

At the time of the review, higher education was governed by the 2005 Law on Higher Education (LoHE). It introduced a three-cycle degree structure, with programmes based on the European Credit Transfer and Accumulation System (ECTS), a Diploma Supplement and a quality assurance system, in line with the principles of the Bologna Process which Serbia had officially joined in 2003. The Strategy for Education Development in Serbia 2020, adopted in 2012, sets a framework for reforms at all levels of education which seek to increase participation, enhance the quality and relevance of education and ensure efficient use of resources. Higher education reforms outlined in the Strategy range from restructuring aimed at more rational use of resources, introducing new performance-related funding mechanisms and streamlining governance to redesigning curricula and improving quality assurance.

The 8-level National Qualifications Framework is yet to be regulated by a law covering both pre-university and higher education and referenced to the European Qualifications Framework. Higher education covers programmes at three levels: (1) first-cycle programmes which include basic academic programmes (180-240 ECTS) and professional programmes (180 ECTS), leading to the degree of Bachelor or Bachelor (Appl.) respectively; (2) second-cycle programmes, including master academic (60-120 ECTS) and professional (120 ECTS) programmes, leading to the degree of Master or Master (Appl.) respectively; and specialist academic and professional programmes, both bearing 60 ECTS and leading to a Specialist degree / diploma; and (3) third-cycle programmes / studies leading to a PhD degree, 180 ECTS (with at least 300 ECTS earned earlier). Master's degree programmes in medical fields are offered as long-cycle programmes.

Serbia has 212 accredited higher education institutions (HEIs): 17 (8 state and 9 private) universities; 125 (87 state and 38 private) faculties or academies of arts within universities; 5 (2 state and 3 private) colleges ('higher schools') of academic studies; and 65 (48 state and 17 private) colleges ('higher schools') of professional studies. Faculties and academies of arts with at least three accredited programmes may operate as legal entities; they are counted as HEIs and are subject to institutional accreditation. Universities (and faculties and academies of arts) may provide programmes at all three levels, whereas

colleges are authorised to offer only first- and second-cycle programmes. LoHE also provides for the establishment of academies of professional studies, with five accredited programmes in at least two fields, but there are no such HEIs yet. Accredited state and private HEIs award state diplomas.

There are approximately 240,000 students, and student numbers have remained relatively stable over the last decade. The overwhelming majority (83%) of students are enrolled at state universities. Nearly 43% of students are State-funded; other students pay tuition fees at both state and private HEIs.

A new LoHE was passed by the National Assembly in October 2017. The higher education system, including types of HEIs and programmes, remains unchanged. The main changes introduced concern the establishment of a new accreditation body within one year (see below); the appointment and composition of the National Council for Higher Education (for its current role in quality assurance, see below); arrangements for the elections to management positions in HEIs; and the retirement age.

QUALITY ASSURANCE

The first Commission for Accreditation was set up in 2002 and tasked with evaluating newly established private HEIs and developing an accreditation methodology. A legal basis for the quality assurance (QA) system in place at the time of this review was provided by the 2005 LoHE, amended several times in the last decade. It defined the types of external quality assurance (EQA) processes, established CAQA as the main body responsible for EQA, specified the responsibilities of CAQA and other national bodies concerned and laid down basic arrangements for internal quality assurance (IQA) at HEIs. For the main changes to be introduced in EQA by the new LoHE, see the final section of the Introduction below.

EQA processes include: initial accreditation of HEIs and programmes (though the term ‘initial accreditation’ refers in the 2005 LoHE only to new HEIs and their programmes, whereas accreditation of programmes to be established at existing HEIs is actually addressed by what LoHE describes as accreditation of HEIs and programmes); periodic accreditation of HEIs and programmes (covered by accreditation of HEIs and programmes in LoHE); and audits (referred to as external quality assurance or external quality control in law)¹. Accreditation is required for all HEIs to operate and provide programmes at all three levels. It aims to assess compliance with minimum standards, including legal requirements concerning the number and type of programmes and the number of teachers and mode of their employment. Accredited HEIs obtain an operating licence which also specifies, among other things, all accredited programmes. It is revoked for an HEI which has failed to pass a periodic institutional review and amended to include new accredited programmes or remove existing ones which have not been re-accredited. Periodic reviews are conducted every five years. Audits, which are also mandatory, are conducted at institutional level every five to eight years and are geared towards quality enhancement. They do not lead to any legal consequences, but where shortcomings are identified, HEIs are subject to a follow-up procedure (see below). HEIs pay fees for accreditation processes, whereas costs of audits are covered from the State budget.

Aside from CAQA, EQA involves, to varying extents, the following bodies: the Ministry of Education, Science and Technological Development (MoESTD); the National Council for Higher Education (NCHE); the Conference of Universities (CONUS) and Conference of Higher Schools (Colleges) (COHS); and the Student Conference of Universities (SCONUS) and Student Conference of Higher Schools (Colleges) (SCOHS). CAQA conducts initial and periodic accreditation reviews and audits. The MoESTD issues,

¹ Confusing terminology in LoHE was also mentioned as an issue in the 2012 review report. For the sake of clarity, the present report uses the term ‘initial accreditation’ as referring to accreditation of both new HEIs and their programmes and new programmes at existing HEIs, ‘periodic accreditation’ as referring to re-accreditation of existing HEIs and programmes, with additional clarifications where necessary, and the term ‘audit’.

amends and revokes operating licences for HEIs on the basis of CAQA's opinions (initial accreditation) and decisions (periodic accreditation) which are both binding on the Ministry. It also provides administrative support to the NCHE and CAQA. The NCHE is a 21-member body elected by the National Assembly of the Republic of Serbia from among candidates proposed by CONUS (12) and COHS (2), the Government (3) and other organisations (4). It supports the MoESTD in strategic planning and has overall responsibility for the harmonisation of Serbian higher education with European and international standards. It elects CAQA members from among candidates recommended by CONUS and COHS; approves standards and procedures for CAQA's processes; and acts as the appeals body in accreditation processes. Finally, the MoESTD may instruct CAQA to conduct an extraordinary accreditation review or audit, and the NCHE may do so in the case of audits.

CONUS and COHS bring together rectors of all universities and principals of all colleges respectively. Aside from proposing candidates for NCHE and CAQA members, both Conferences provide advice on QA standards for education, research and other activities of HEIs. SCONUS and SCOHS, composed of representatives of student parliaments operating at HEIs, nominate two representatives who take part, without the right to vote, in the work of the NCHE on QA standards and procedures. Though this is not addressed by LoHE, both Conferences also select students to be involved in CAQA's processes. Similarly, the Serbian Chamber of Commerce selects employers' representatives for CAQA's processes.

HEIs are required by LoHE to set up a body responsible for IQA and carry out a self-evaluation at least every three years. Such a body should be composed of teaching and non-teaching staff and students and is responsible for self-evaluation. Self-evaluation obligatorily takes into account findings from student course evaluations. HEIs conduct a self-evaluation and prepare a self-evaluation report in accordance with CAQA's standards and guidelines. Reports are taken into consideration in CAQA's periodic institutional accreditation reviews and audits.

COMMISSION FOR ACCREDITATION AND QUALITY ASSURANCE

CAQA was established in 2005 as a 'separate working body' of the NCHE on the basis of LoHE. LoHE sets an overall framework for its activities and defines its powers and responsibilities, and CAQA's Rules of Procedure lay down its detailed operational arrangements. In its mission statement, CAQA aims to maintain and enhance quality of higher education in Serbia, comply with international standards, create a pool of reviewers for its EQA processes, and be the main driving force for QA development in the Western Balkans.

CAQA members for the first four-year term were appointed in 2006. Between 2006 and 2007, CAQA developed its EQA methodologies and related guidelines, selected and trained a pool of reviewers and organised training seminars for HEIs and reviewers. Since 2007, it has completed two cycles of periodic institutional and programme accreditation reviews (2007-2011 and 2012-2016) and one cycle of audits (2011-2015); the third accreditation cycle is underway. In total, it conducted 29 initial accreditation reviews (only new HEIs and their programmes included here) between 2013 and 2017; 465 institutional and 4 401 programme accreditation reviews (including initial accreditation reviews of programmes at existing HEIs) between 2007 and 2016 (plus 13 institutional and 151 programme reviews by the time of the submission of the SAR in 2017); 187 audits between 2011 and 2015, and 6 extraordinary ones requested by the MoESTD between 2014 and 2017 (Terms of Reference for the Review; SAR, Table 5).

In 2016, CAQA revised its standards to adjust them to the amended LoHE and the revised ESG and integrate the experience gained so far in accreditation and auditing. The revised standards were published in the Official Gazette in September 2017. CAQA will revise its guidelines and templates and organise training seminars for reviewers and HEIs as from autumn 2017. The standards will be

introduced for applications based on the new templates (those submitted by HEIs in November 2017 are still based on the 'old' standards and templates).

CAQA'S ORGANISATION/STRUCTURE

CAQA is composed of 17 members who are elected and appointed by the NCHE, for a maximum of two four-year terms, from among distinguished academics, artists and experts recommended by CONUS and COHS. The 15 members appointed at CONUS' recommendation represent five main subject areas (natural sciences and mathematics; social sciences and humanities; medical sciences; engineering and technology; and fine arts), with three members from each. The two COHS-recommended members represent professional programmes (see the higher education system above); they joined CAQA on the basis of 2015 amendments to the 2005 LoHE.

CAQA has a President and a Vice-President elected from among its members. The President is in charge of overall management, convenes and chairs CAQA's meetings, signs its decisions, and represents it in external relations. The Vice-President is responsible for the organisation of CAQA's work. The Secretary General (an informal position) is responsible for human resources management; there is also a contact person for ENQA, EQAR and international relations. There are five sub-commissions, composed of CAQA members, for the main subject areas. The 17 CAQA members perform a double role; they are directly involved in EQA processes (see the procedures below) and are the CAQA decision-making body. CAQA may also establish sub-commissions for specific tasks (e.g. revision of standards, SAR). An ad-hoc Ethics Commission is set up for individual cases.

Until summer 2017, CAQA's administrative office had 8 staff members, including a lawyer / office manager, employed by the MoESTD, who no longer works for CAQA (Pre-visit clarifications). The seven staff members are hired and paid by CAQA. The MoESTD provides premises and administrative support to CAQA. While the President has the exclusive responsibility for managing CAQA's budget, funds are kept, as a separate budget line, in a MoESTD bank account and payments are made by the Ministry.

CAQA is supported by 721 national and 17 international academic experts, and students and employers participating in EQA processes.

The NCHE (see the QA system above) acts as the appeals body in accreditation processes. It appoints rapporteurs from among its members for each appeal filed and takes decisions in its plenary sessions.

CAQA'S FUNCTIONS, ACTIVITIES, PROCEDURES

CAQA conducts initial and periodic accreditation of HEIs and programmes and audits (for the different terminology used in the 2005 LoHE, see the QA system above) as its core activities. As stated in the 2005 LoHE, its responsibilities also include supporting HEIs in assuring and improving quality. Thus, it organises training seminars to help HEIs implement internal quality assurance standards and conduct self-evaluations which provide the basis for audits. As mentioned above, periodic institutional and programme accreditation reviews are conducted every five years, and audits every five to eight years, between accreditation cycles. LoHE also requires that academic experts – other than CAQA members – participating in EQA processes remain anonymous; thus, they assess compliance with the standards based only on documentation submitted by HEIs and are not involved further on in processes.

For new HEIs and their programmes, initial accreditation combines an institutional and programme review. The procedure comprises a pre-screening of documentation by a CAQA sub-commission; an analysis of documentation by academic experts who produce individual reports; and a site visit undertaken by a CAQA sub-commission which subsequently prepares an overall report, integrating experts' assessments. CAQA gives a positive or negative opinion which is binding on the MoESTD. A

positive opinion provides the basis for the MoESTD to issue an operating licence for one year. Then both the HEI and its programmes undergo a periodic accreditation review within a year. A review of a new programme at an existing HEI is based on the procedure for periodic accreditation.

A periodic institutional accreditation review consists of an analysis of documentation by academic experts who prepare individual reports; a site visit by a panel composed of CAQA sub-commission members, a student and an employer which ends with a report; and an overall report integrating all findings, prepared by the CAQA sub-commission concerned. The procedure for programme reviews provides for an analysis of documentation by academic experts and an overall report produced by a CAQA sub-commission on the basis of experts' reports. While institutional and programme reviews are usually combined and, thus, include a site visit, no visit is undertaken as part of a 'separate' programme review, except in specific cases (see ESG 2.3).

Periodic reviews lead to accreditation, an 'act of warning' (considered to be part of an ongoing process) or refusal of accreditation. CAQA's decisions are binding on the MoESTD. Accredited HEIs and programmes receive an accreditation certificate from CAQA. HEIs and programmes with an 'act of warning' have up to six months to eliminate shortcomings and submit revised documentation as part of a follow-up, followed by the accreditation decision. Where accreditation is refused, the operating licence (for an HEI as a whole as a result of an institutional review or with regard to a given programme as a result of a programme review) is revoked; it remains valid for one year, but students may no longer be enrolled. An HEI whose licence has been revoked may apply for a new licence one year after the date of the revoking decision. Where accreditation is refused to a faculty / academy of arts which operates as a legal entity and is thus subject to institutional accreditation (see the Higher education system above), this has no implications for an accreditation decision of its 'home' university if the university has accredited programmes in all least three fields and at all three levels.

Audits follow the same procedure as periodic institutional accreditation reviews. Where an HEI successfully passes an audit, no further action is taken until the next one. Where major shortcomings are identified, the HEI is required, as part of a follow-up procedure, to design a remedial action plan and report on its implementation within six months, and CAQA may subsequently undertake a site visit. HEIs which are subject to an audit follow-up procedure may not be granted accreditation; CAQA takes an accreditation decision only after an audit has been completed with a positive report.

As a full member of ENQA, CAQA participates in ENQA General Assembly sessions and seminars. It is a full member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). In recent years, it has been a partner in several international QA projects (Tempus, Council of Europe, WUS Austria), has undertaken study visits to QA agencies in several countries (e.g. Austria, Croatia, Finland, Hungary, Ireland, Norway and Slovenia) and (co-)organised several international events on QA. It has established close links with the QA agencies in the Western Balkans and regularly takes part in regional meetings devoted to higher education and QA.

CAQA'S FUNDING

CAQA is funded from the State budget. Accreditation fees are paid by HEIs to a MoESTD bank account, and the State-budget / MoESTD provides funding to cover the costs of audits. The main expenditure items are salaries for CAQA members and staff, and fees for academic experts, students and employers involved in EQA processes. While premises and administrative support are provided by the MoESTD free of charge, CAQA purchases IT and office equipment and covers costs of external services, including equipment maintenance, travel costs and membership fees for international organisations from its own budget. It has had a budget surplus in recent years.

NEW LoHE: MAIN PROVISIONS CONCERNING THE QA SYSTEM AND CAQA'S OPERATIONAL FRAMEWORK

The new LoHE will establish a new accreditation body as a legal entity within one year. The body will have a Board and a Director and will incorporate CAQA. CAQA members will be appointed by the Board from among candidates put forward by the NCHE; both the Board and the NCHE will be appointed by the Government, the former composed of seven members recommended by the MoESTD (3), the Serbian Chamber of Commerce (2), CONUS (1) and COHS (1), and the latter of 17 members recommended by the MoESTD (7), the Chamber of Commerce (2), CONUS (6) and COHS (2). CAQA's operational arrangements will be laid down in its Statutes; it will be funded from its own revenues and the State budget. Its EQA processes will remain unchanged, but the length of a cycle will be extended to seven years for accreditation and reduced to four years for audits, with self-evaluation conducted by HEIs in-between. The MoESTD will retain its responsibility for operating licences issued to HEIs. The new LoHE does not contain provisions whereby CAQA's academic experts should remain anonymous.

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

A note from the panel: The panel would like to highlight CAQA's unique structure and other features, outlined in the Introduction and discussed in the relevant ESG sections, as these are crosscutting issues which impact, to varying extents, on CAQA's compliance with ESG 3.1, 3.5, 3.6, 2.2, 2.3, 2.4 and 2.6.

CAQA, with its 17 members, including its President taking overall responsibility for management and Vice-President for work organisation, is the only body of the agency, carrying out all functions in the areas of strategic planning, management, daily operations, conducting EQA processes and taking decisions, with tasks shared among the members. CAQA is supported by an administrative office with seven staff members.

The multifunctionality of CAQA becomes particularly clear in its unusual role in EQA processes. Its members see themselves as being at the core of the peer review system and their involvement in EQA processes as their primary duty. CAQA uses external experts in its processes; academic experts should, however, remain anonymous, as required by LoHE. Thus, it is CAQA members themselves that both play a central role in the preparation and conduct of, and take decisions in, EQA processes.

For its EQA processes, CAQA appoints a sub-commission composed of its members as responsible for a given review / audit. Then it nominates external academic experts who, independently of each other, conduct a desk-based analysis of the documentation submitted by an HEI and each of them writes an anonymous report on compliance with CAQA's standards. Reports are submitted to the CAQA sub-commission. Where a site visit is part of the process, it is conducted by CAQA sub-commission members together with a student and an employer representative and ends with a report. Based on external experts' reports and the site visit report, the CAQA sub-commission drafts the final report which forms the basis of a decision taken by CAQA.

This particular structure should be born in mind in order to understand the rationale behind CAQA's operations and in the analysis of its compliance with the ESG regarding its overall activities, resources and, in particular, the overall design and implementation of EQA processes, the role of peer reviewers and reporting.

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.

2012 review recommendations²: *(1) It is strongly advisable that CAQA's mission statement is translated into long term strategic plans (every 3-5 years) with more detailed actions plan agreed each year to ensure its implementation [...]. (2) The mission statement might also include the range of responsibilities and a clear statement on the working principles of CAQA. (3) It might also be possible in a foreseeable future to rethink the composition of the Commission. The panel recommends giving serious consideration to adding nominees of the Student Conferences and representatives from the labour market to the Commission [...] [o]nce the legal frameworks are changed [...].*

Evidence

CAQA's remit is defined in the 2005 LoHE. As its core activities, it conducts initial and periodic accreditation reviews of HEIs and programmes and audits based on procedures and standards (see ESG 2.1-2.3). Additionally, as part of its statutory task to support HEIs in assuring and improving quality, CAQA provides training on IQA standards to help HEIs carry out self-evaluations which provide the basis for its audits (SAR). Initial accreditation reviews are carried out in a fixed period of the year (if any applications are submitted by an annual deadline) (SAR; Meeting with staff), periodic accreditation reviews every five years (unless requested earlier by the HEI concerned or the MoESTD), and audits every five to eight years (unless requested earlier by the HEI concerned, MoESTD or NCHE) (LoHE). In addition to a number of initial accreditation reviews, CAQA has completed two accreditation cycles and one audit cycle since 2007, and the third accreditation cycle is ongoing (for statistics, see the introductory section on CAQA).

In its mission statement, CAQA aims to (1) maintain and enhance quality of higher education in Serbia; (2) comply with international standards; (3) create a pool of trained reviewers for its EQA processes; and (4) be the main driving force for QA development in the Western Balkans. CAQA's Strategy 2013-2017, which is available only in English and is not mentioned in the SAR, defines its mission, vision, tasks and objectives. In its general objectives, CAQA seeks to implement and develop a QA system and culture in Serbian higher education, and strengthen its position within the country and at international level (ENQA membership, EQAR registration, a leading position in the Western Balkans). These are further translated into specific objectives (e.g. to ensure CAQA's compliance with the ESG, its optimal performance and use of resources, etc.; to ensure that every HEI and programme meets CAQA's standards, etc.), together with activities, performance indicators and risk management mechanisms. An action plan was adopted for the Strategy (Final clarification meeting with CAQA).

CAQA has an annual plan of its EQA activities, and a five-year plan for an accreditation cycle (SAR; Pre-visit clarifications). As explained in the Pre-visit clarifications, there is no overall annual plan covering a full range of CAQA's activities, including, for example, a review of the Strategy, training for HEIs, CAQA experts or staff, events to be organised or attended. Activities such as training or participation in international events are included in the financial plan submitted to the MoESTD as the basis for CAQA's budget; the latter are then planned on a short-term basis due to uncertainty as to whether funding will be made available by the MoESTD in time; **thematic analyses are planned but not in writing**. Various ad-hoc tasks are assigned to CAQA by the MoESTD and the NCHE (e.g. opinion on the new LoHE draft or extraordinary audits requested by the former; the recent revision of EQA standards initiated by the latter).

CAQA monitored progress in the implementation of its Strategy until roughly one year ago when it ceased to do so due to the heavy workload (additional tasks related to the new LoHE draft and the revision of the standards) (Final clarification meeting). Its 2016-2017 Annual Report provides statistics on accreditation

² Given the length of the 2012 recommendations (some also combined with factual statements on the arrangements in place and / or analytical comments) on the one hand and the space limit for the present report on the other hand, only the key phrases of the recommendations are quoted in this and the following sections.

reviews and their outcomes, and information on CAQA members' activities (participation in national and international activities, contributions to various studies / papers on higher education and QA, etc.).

CAQA, which is a decision-making body in itself, has 17 members who are all academics (LoHE; see also ESG 2.5); they are also directly involved in EQA processes, assessing documentation, participating in site visits and drafting reports (for details, see CAQA's functions and ESG 2.2-2.3). Its President is responsible for convening and chairing meetings, signing CAQA's decisions, financial management, and communication with external bodies (CAQA's Rules of Procedure). As explained in the Pre-visit clarifications, the President is in charge of overall management and the Vice-President for work organisation.

Academic experts assess documentation submitted by HEIs and are not involved further on in EQA processes. Students and labour market representatives participate in site visits in some processes. (See also the note from the panel above and further details under ESG 2.3 and 2.4)

As explained by MoESTD representatives during the visit, when CAQA was established, students were not appointed as CAQA's members or involved in its decision-making as the emphasis was placed on CONUS and, later also, COHS involvement and no students' conference existed yet. The new LoHE does not provide for the involvement of students in CAQA's governance (though they will be obligatorily involved in audits). However, all relevant stakeholders interviewed by the panel were in favour of the idea and, as the panel learned from the MoESTD representatives, this can still be addressed by a bylaw to the newly enacted LoHE. The employers' representatives that the panel met are satisfied with the current arrangements where they participate only in EQA processes and consider that it would be difficult to find individuals who could be more extensively involved in CAQA's activities as its members.

The representatives of HEIs, students, employers and experts interviewed confirmed that they had ample opportunities to contribute to CAQA's EQA methodologies (for details, see ESG 2.2).

In all their meetings with the panel, CAQA members emphasised that improving quality in higher education was their principal objective, and ensuring that basic pre-conditions (an adequate number and qualifications of staff, space and facilities) were in place at HEIs to provide high-quality education, and combatting the problem of 'fake' qualifications (awarded by HEIs not accredited to do so), especially PhD degrees, were of paramount importance in Serbian higher education. This view was shared, and CAQA's work in this area greatly appreciated, by all the stakeholders interviewed. All of them agree that CAQA's work is both necessary and important, and it has done a great job in making QA 'settle in' in Serbian higher education, increasing transparency of HEIs' activities and promoting quality improvement. While there was resistance in HEIs and some criticism in the media in the past, this is understandable as QA was a novelty a decade ago and accreditation decisions cannot make everybody happy, and CAQA has gained acceptance for its activities over the years.

Analysis

The panel confirms that CAQA is engaged only in EQA activities and conducts them on a regular basis, and in accordance with predefined standards and procedures (see ESG 2.1 and 2.3), with the requirement for regularity of EQA processes being explicitly laid down by the national legislation.

The panel also confirms that CAQA's mission statement is published on its website. CAQA's objectives as such are clearly defined in the statement. The objective of maintaining and enhancing quality may be slightly misleading, though, as CAQA's processes actually seek to both ensure compliance with minimum requirements (accreditation reviews) and enhance quality (audits). Further, while the 2005 LoHE does not impose any constraints in this respect, the mission statement has not been revised so as to identify

CAQA's remit and principles, as suggested by the 2012 review panel. This would have also clarified CAQA's position in the national QA landscape as a key body in mandatory EQA processes and its position vis-à-vis HEIs and other stakeholders.

The 2013-2017 Strategy, developed in line with the related 2012 recommendation, addresses, in the panel's view, all the objectives defined in the mission statement and could provide a comprehensive framework for CAQA's daily operations; it fairly accurately translates CAQA's objectives into activities and covers both its core EQA activities and supporting ones (e.g. training for experts, development of internal documents, meetings with stakeholders). Since, however, no overall annual activity plans are devised to operationalise the Strategy, there is no formal basis to guide CAQA's daily work towards its objectives. Further, the Strategy is available only in English and, thus, does not seem to be intended to inform stakeholders in Serbia about what CAQA seeks to achieve.

The panel also notes that CAQA does not have in place a mechanism for reviewing progress in the implementation of the Strategy and, thus, for assessing how effectively it pursues its objectives through its daily activities. Progress checks or follow-up actions are no longer undertaken, while this would also contribute to better forward planning. All the written and oral evidence available shows that CAQA's daily activities are, overall, geared towards the first three objectives in its mission which centre around its EQA tasks; the one related to its leading position in the Western Balkans appears slightly too ambitious, given all the constraints which limit the scope of its activities extending beyond EQA processes. It is also clear from the evidence collected that management activities (e.g. regular external feedback collection and development of improvement action plans as part of IQA; continuing training of staff, analysis of interviews with staff), which can improve daily performance of a QA agency and help it effectively pursue its objectives, have not been carried out as planned in the Strategy.

The evidence collected indicates that there is a strong focus in CAQA on its EQA-related activities and little consideration given to institutional planning and management or linking policy (mission, strategy) with activities and processes. Aside from the limited human resources available (see ESG 3.5), this seems to result from CAQA's specific structure – it is conceived more as a committee of experts than a fully-fledged QA agency, with no clear separation between planning and management and EQA-related functions. This is also reflected in CAQA's internal regulations which clearly define the President's responsibilities relevant to EQA processes but do not assign explicitly the responsibility for overall institutional planning and management, except for financial management, to the President or Vice-President. In practice, planning is limited to EQA processes and funding. Since all CAQA members are extensively involved in EQA processes as their primary duty and ad-hoc tasks add to their heavy workload, this results in trimming management tasks such as assessing performance against the objectives. The QA body to be set up by the new LoHE is likely to address these issues; see Additional observations and Suggestions for further development.

It is a significant improvement that CAQA has engaged employer representatives in its EQA processes since 2013. However, despite the 2012 recommendation, stakeholder involvement is still limited in both CAQA's governance and EQA work. Neither students nor employers are represented among CAQA members. While the 2005 LoHE provided no space for change and the new LoHE has failed to tackle the issue for the prospective QA body, there seems to be a consensus among the stakeholders, including the MoESTD, about involving students in CAQA governance, and it still seems possible to address this in legal terms, as the panel gathers from its interview with MoESTD representatives. It would indeed be imperative to do so not only because students are a key stakeholder, but also because they take part in the NCHE's work on standards for EQA processes, their engagement in IQA features prominently in EQA standards and they are represented in HEIs' governance bodies at all levels. The panel understands that it would be unrealistic to expect more extensive involvement of

employers due to CAQA's heavy workload. However, the panel notes that the double role of CAQA members might be one reason for this, and the issue will be in a way addressed by representatives of the Chamber Commerce sitting at least on the Board of the new QA body (see the Introduction). The involvement of external academic experts, students and employers in EQA is limited to one of the several stages in a process, which largely results from the 2005 LoHE requirement for academic experts to be anonymous. For further comments, see ESG 2.2-2.4. The panel also believes that, like many other QA agencies, CAQA would benefit from consulting regularly its own advisory body which could bring together national and international experts.

The panel has found ample evidence that CAQA is strongly committed to pursuing its QA mission and ensuring adequate conditions (officially recognised qualifications held by staff, space and facilities) for higher education; and in doing so, it seeks views on, and inputs to, its EQA processes from its stakeholders – insofar as it is possible within the constraints set by the national legislation. It is also evident to the panel that CAQA has gradually developed into a trustworthy institution and the value of its work is widely recognised and greatly appreciated by its stakeholders.

Panel commendations

The panel commends CAQA for continued commitment to its mission and doing its job in a way which is genuinely appreciated by its stakeholders despite tough accreditation decisions it has made.

Panel recommendations

The panel recommends that CAQA (1) revise its mission so that it clearly defines the range of its responsibilities, principles underlying its work and the nature of its interaction with stakeholders; (2) put in place mechanisms for effective forward planning and reviewing progress towards its objectives; and (3) take action, insofar as it is possible within its remit, to ensure that students and employers have their representatives in CAQA governance.

Panel suggestions for further improvement

The panel encourages CAQA to consider establishing an advisory body involving international experts.

Panel conclusion: Partially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

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

Evidence

CAQA was established and currently operates on the basis of the 2005 LoHE where it is referred to as a 'separate working body' of the NCHE. LoHE provides an overall framework for CAQA's activities, including the procedure for the appointment of its members, its EQA remit as including accreditation reviews and audits, its basic operational arrangements, and its relationship with the MoESTD and the NCHE (see the section on the QA system). Pursuant to LoHE, CAQA's accreditation opinions and decisions (see ESG 2.7) are binding on the MoESTD and provide the basis for the Ministry to issue, amend and revoke operating licences for HEIs; while outcomes of CAQA's audits do not lead to any consequences defined by law, they are obligatorily taken into account in its accreditation processes.

Analysis

CAQA is not a legal entity. However, it is evident to the panel from LoHE that CAQA has a clear legal basis for its EQA activities, is the only statutory body responsible for conducting accreditation reviews and audits in the Republic of Serbia, and the outcomes of all of its EQA processes are recognised by the national authorities. They are, likewise, accepted by HEIs and stakeholders, as the panel found in its interviews with their representatives (see ESG 3.1). It is also clear from LoHE that CAQA's 'jurisdiction' does not extend beyond the Republic of Serbia, and all the evidence collected by the panel confirms that CAQA indeed conducts its EQA activities only within the country.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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

2012 review recommendation: *The [...] panel would advise that the independence of CAQA in procedural matters is more clearly stated and supported in the legal documents and that CAQA's relation and its role as an independent body towards NCHE is clarified. Particularly, it would be advisable that NCHE is not the body responsible for both establishing CAQA and serving as an appeal body to CAQA's decisions. It would be procedurally better to establish a separate Appeals body.*

Evidence

Pursuant to LoHE, CAQA is a 'working body' of the NCHE, and its members are appointed, for a maximum of two terms, by the NCHE from among candidates recommended by CONUS and COHS and identified through an open call. Members may not hold any function in central or local government, or a body of a political party, or an executive position in an HEI. They may be dismissed by the NCHE before the end of a term at their own request; for failure to perform duties conscientiously or misconduct damaging reputation of the office, at the reasoned request from CONUS and COHS, or for failure to meet deadlines for EQA processes set by law; or when they take up any of the positions listed above. No member has been dismissed until now (SAR). CAQA elects its President and Vice-President from among its members and establishes sub-commissions to perform its tasks (LoHE; Rules of Procedure). Until summer 2017, CAQA's administrative office had a lawyer / office manager employed by the MoESTD; currently, all staff are hired and paid by CAQA (SAR; Pre-visit clarifications).

CAQA is financed from the State budget (LoHE) on the basis of its financial plans approved by the MoESTD; its budget is managed by its President (Rules of Procedure). It does not have a bank account; funds are kept, as a separate budget line, on the MoESTD's account and payments made by its services. Some activities can be planned only on a short-time basis as funds are not readily available, and there have been delays in payments for experts; this is considered a major constraint by CAQA. (SAR; Pre-visit clarifications; Meeting with CAQA members). The MoESTD also provides premises and administrative support to CAQA (LoHE; SAR).

CAQA adopts its Rules of Procedure which lay down its organisational and decision-making arrangements. It draws up its own schedules of EQA activities and may also be requested to carry out a periodic accreditation review by the MoESTD and an audit by the MoESTD and the NCHE. Its

standards and procedures for EQA processes are approved by the NCHE; recently, standards have been revised by CAQA and the NCHE as part of a joint working group. (LoHE; Rules of Procedure; SAR; Meetings with CAQA members and the NCHE) Academic experts participating in EQA processes are selected for the pool of experts and appointed for individual reviews and audits by CAQA (SAR) (see ESG 2.4). Student and employer representatives involved in EQA processes are selected for the pool of experts by SCONUS and SCOHS and by the Serbian Chamber of Commerce, respectively, and appointed for individual reviews and audits by CAQA (SAR; Pre-visit clarifications), in consultation with SCONUS and SCONUS in the case of students (Meeting with SCONUS and SCOHS).

CAQA takes formal decisions in its EQA processes (see ESG 2.5) in accordance with its Rules of Procedure (LoHE). Decisions are taken by a simple majority vote, with at least two-thirds of its 17 members required to attend a meeting (Rules of Procedure). The NCHE acts as the appeals body for accreditation processes; it may confirm CAQA's decision, take its own decision or refer the case back to CAQA to reconsider its decision (LoHE; SAR) (see ESG 2.7). CAQA is not satisfied with the appeals arrangements (SAR, SWOT analysis). To address the 2012 recommendation, it suggested that a separate body should be set up either within the new QA body to be established by the recently enacted LoHE or within the NCHE (CAQA's Analysis of the draft LoHE). CAQA's Rules and regulations on standard procedures of external quality control (i.e. audits) state that the outcome of an audit is confirmed by the NCHE. However, the NCHE makes no changes in CAQA audit reports and approves them only in formal terms (Pre-visit clarifications; Meeting with the NCHE).

As stated in the Standards of CAQA Work, CAQA works independently of the Government, HEIs, industry and other organisations. CAQA members, staff, academic experts, students and labour market representatives involved in EQA processes are obliged to adhere to CAQA's Rules of Procedure, Code of Ethics and the Standards of CAQA Work (SAR) and sign the Code of Ethics, as confirmed by all the groups concerned during the visit. The Code of Ethics defines a conflict of interest, values and rules of conduct such as independence, integrity, objectivity, impartiality and individual responsibility, and specifies cases considered a breach of the Code and sanctions. An Ethical Commission is elected on an ad-hoc basis. One expert has been removed from the pool for contacting an HEI under review, thus breaching the Code (Meeting with CAQA members).

In its meetings with the panel, CAQA members emphasised they felt fully independent in their decision-making and expected to become fully independent in terms of organisational and financial arrangements when incorporated into the QA body to be set up as a legal entity by the new LoHE. While some mentioned attempts to exert political leverage, the stakeholders interviewed are unanimous in their view that CAQA has firmly resisted all pressure and highlight independence as its distinctive feature. Experts, students and employers involved in EQA processes feel completely free in making their judgments.

Analysis

The arrangements in place have remained unchanged since the previous review, except that CAQA no longer has its own bank account. The framework for CAQA's activities and, thus, the extent of its independence is largely predetermined by the national legislation. Neither the 2005 LoHE nor, consequently, CAQA's internal regulations explicitly refer to it as a fully independent body, and the panel agrees with the 2012 review panel that CAQA's autonomy in procedural matters is limited to some extent by legal documents (it is not in a position to judge whether this will be adequately addressed by the new LoHE, but see Suggestions for further development). It notes, however, that CAQA's Standards of Work show its determination to safeguard its autonomy within the legal constraints and the oral evidence collected confirms that this is indeed the case in practice.

Though not a legal entity and referred to in LoHE as the NCHE's working body, CAQA is a separate body in organisational terms. The panel considers it to be independent insofar as it appoints its head and deputy head, determines its internal structure (sub-commissions), currently employs its own staff and manages its own budget. At the same time, the 2005 LoHE evidently ties up CAQA to the NCHE through the arrangements for the appointment and dismissal of its members and to the MoESTD through funding, premises and administrative and financial services. However, in the panel's view, this gives no or very little leverage to the NCHE as its role in appointment is limited to choosing from among candidates put forward by CONUS and COHS, and the rules for dismissal are clearly defined and a reasoned request from the two Conferences is necessary in the cases of negligent performance and misconduct. State budget funding received via the MoESTD does not seem to pose any risk, in particular, considering that the MoESTD is not involved at all in the appointment and dismissal of CAQA members, and CAQA decisions are taken collectively (see below). However, the fact that CAQA does not have its own bank account and its dependence on the Ministry's administrative and financial services place limitations on its planning, management and operational efficiency. This, quite unusual, form of dependence is pre-determined by LoHE insofar as it refers to support services to be provided by the MoESTD but it does not explicitly refer to a bank account; this issue would need to be resolved.

CAQA's operational independence is formally limited by the LoHE requirement for its EQA standards and procedures to be approved by the NCHE; the panel notes, however, that in practice, standards are developed or revised jointly where the two bodies collaborate on an equal footing. While the MoESTD and the NCHE may instruct CAQA to undertake an extraordinary accreditation review and / or audit, the panel has found no evidence that those isolated cases disrupt in any way processes conducted according to CAQA's own schedule. Full autonomy in selecting and appointing academic experts for EQA processes is explicitly guaranteed by LoHE and the panel has found evidence that it is exercised in practice. Though SCONUS and SCOHS and the Chamber of Commerce pre-select students and employers for the pool and CAQA also consults the former in nominating students for individual reviews or audits, in the panel's view, this is an indication of close collaboration rather than of interference in CAQA's independence.

The panel considers that CAQA has full independence in decision-making. As signalled above, it is not undermined by any of the organisational or operational constraints. Some buffers protecting CAQA against potential interference by those having political power or HEIs are also provided by LoHE (exclusion criteria for CAQA members). Collective rather than individual decision-making serves as another protective barrier, especially in combination with CAQA's internal documents, including the Standards of Work and Code of Ethics; in the panel's view, the latter makes it totally clear that independence of judgment based exclusively on expertise is a fundamental principle. All the interviews held clearly demonstrate that CAQA has been both very conscious of the value of independent judgment and vigilant, and the panel notes that this is both very important for, and much appreciated by, stakeholders.

The panel confirms that CAQA members and staff, academic experts, students and employers interviewed are aware of the contents of the Code of Ethics. An expert removed from the pool is a good example of how the Code works in practice, though given the limited involvement of external experts in EQA processes (see also ESG 2.4), it is more important that the Code 'reinforces' independence of CAQA members in decision-making.

Finally, as regards the 2012 review panel's concerns over the dual role of the NCHE as appointing CAQA members and acting as the appeals body, the panel agrees that the arrangement is not very transparent. However, in the panel's view, the appeals arrangements do not in any way interfere with CAQA's decision-making and, as noted above, the appointment and dismissal procedures leave no or

little space for the NCHE to use them as leverage, in particular, in combination with CAQA's collective decision-making. For further comments on appeals, see ESG 2.7.

Panel commendations

The panel commends CAQA for sustained and successful efforts to safeguard its independence within the constraints placed by the national legislation.

Panel recommendations

The panel recommends that CAQA be provided with its own bank account to reduce its dependence on the Ministry of Education in administrative terms which has significant impact on CAQA's planning and management. For the recommendation on the appeals procedure, see ESG 2.7.

Panel conclusion: Substantially compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2012 review recommendation: [...] CAQA has already decided to implement a strategic system-wide analysis in the near future. This decision [...] is strongly supported by the [...] panel. In this context, it is also recommended that CAQA office staff should be able to provide appropriate support to this activity.

Evidence

CAQA has produced a number of thematic analyses since 2012. They include: System-wide analyses of higher education institution units in Serbia, of higher schools of professional studies in Serbia, and of HEIs in the field of medicine; Accreditation of faculty units (in Serbian only); Accreditation in higher education in the field of agriculture; Distance learning in Serbia; Effects of quality assurance in Serbian higher education after the first round of accreditation; Impact of the evaluation process on HEIs in Serbia; and CAQA experience after two cycles of study programme accreditation (a presentation) (CAQA website). CAQA now plans to analyse findings from the second accreditation cycle (Pre-visit clarifications). Analyses aim to guide national policies, present impact of QA on higher education to the public, and promote CAQA's achievements. Those covering specific subject areas or types of HEIs are intended to help the MoESTD plan student enrolment in public higher education. (SAR)

CAQA presents findings from its analyses at national and international events and uses feedback from participants to revise its standards (e.g. those for PhDs introduced). An example of their impact at policy level is the NCHE's decision to suspend the accreditation of new HEI units as one of the analyses showed that existing ones already ensured adequate coverage across the country. As the analyses also show that many ongoing programmes are in social sciences and humanities, the MoESTD now expects HEIs to submit IT programmes for accreditation. HEIs and students are informed about findings at regular meetings. (SAR; Meetings with CAQA members; CONUS and COHS; SCONUS and SCOHS)

Stakeholders have not requested any thematic studies on specific topics. Topics and contents of analyses are chosen by CAQA members. Administrative staff supporting the CAQA sub-commissions for specific fields of study contribute to sectoral analyses and, together with other staff, provide technical support. (SAR; Meetings with the SAR Group, CAQA members, staff and stakeholders).

Analysis

The studies produced so far, with the support from staff, show much progress made under this ESG since the previous review. The panel has found evidence that studies are regularly produced. It has read the studies available in English. They provide and analyse detailed statistics on accreditation reviews and their outcomes and on accredited HEIs and programmes. Some also compare accreditation review outcomes and key indicators for HEIs between two accreditation rounds, showing trends and improvements (improved student-teacher ratios; decreasing or increasing student numbers by area, etc.). Thus, the panel agrees that they provide invaluable inputs to evidence-based policies for higher education at national level. There is also evidence that CAQA itself makes use of the data to improve its EQA processes and increase awareness of its stakeholders. The focus of the analyses on quantitative data reflects the main aim of accreditation reviews to assess compliance with threshold requirements for programmes, teaching staff and space.

The panel understands from its meetings that the information available in the analyses is sufficient for the stakeholders. In the panel's view, however, CAQA would now need to broaden the focus of its analyses so that they cover not only quantitative but also qualitative aspects, including all those related to quality itself and quality enhancement. The studies produced refer to improvements such as high-quality self-evaluation reports from HEIs and their findings being consistent with experts' assessments; good SWOT analyses in HEIs' reports; well-organised site visits; and better understanding of processes among stakeholders. Surveys among HEIs (see ESG 3.6) provide general feedback on the impact of processes. There is, however, no analysis of areas of good practice and areas for improvement in terms of quality or IQA. These could be identified, for example, by CAQA audits, which are aimed primarily at quality enhancement, together with the audit standards which HEIs fully or substantially complied or were struggling with in the first audit cycle. The panel considers that the audit standards, which cover a wide range of quality-related issues, enable CAQA to collect ample evidence for analysis and reflection. A study focusing on quality would be instrumental in guiding development of IQA at HEIs (before the second audit cycle), and useful for the MoESTD and the NCHE in designing or revising national QA policies, and for CAQA in reviewing its methodologies (see also ESG 2.1).

Panel recommendations

The panel recommends that CAQA produce regularly thematic analyses addressing quality and internal quality assurance, in addition to those available and planned which focus on quantitative aspects.

Panel conclusion: Substantially compliant

ESG 3.5 RESOURCES

Standard:

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

2012 review recommendations: *The panel would strongly encourage CAQA to set up concrete steps and actions towards a sustainable strategy concerning its human resource development. [...] It is important that CAQA has a permanent and trained and skilful office staff to support it in all its activities. [...] [S]taff members, when appropriate, should [...] be involved in CAQA's strategic or methodological discussions [...], be able to provide appropriate support for [...] [system-wide analyses].*

CAQA should encourage the participation of the staff members in training, and specific training events and seminars on national but also on international level.

Evidence

CAQA is funded from the State budget (LoHE), with accreditation fees paid by HEIs (to the MoESTD account) and costs of audits covered by the State budget (SAR; Pre-visit clarifications). The level of accreditation fees is determined by CAQA with the approval of the NCHE and the Government (LoHE). Funds are disbursed in accordance with financial regulations for the public sector (Meetings with CAQA members, staff and the MoESTD). CAQA's budget is set annually on the basis of its financial plans approved by the MoESTD. Premises and administrative support are provided by the MoESTD free of charge. The main items in CAQA's budget are salaries for its members and staff, fees for experts, students and employers involved in EQA processes; costs of equipment purchase; external services; missions; and membership fees for international organisations. CAQA had a budget surplus in the last few years. (CAQA's Rules of Procedure; SAR, Annex 4). The budget usually provides the level of funding that CAQA needs for its activities (Meeting with CAQA members).

In their meetings with the panel, CAQA members and staff and the MoESTD representatives all pointed to complex procedures for financial management, including public procurement, in the public sector as laid down in the national legislation. Furthermore, it is not possible now to employ new staff and raise salaries in the public sector.

CAQA has 17 members who divide among themselves tasks related to overall institutional planning and management, daily operations and internal quality assurance, and to conducting EQA processes and related decision-making (SAR; see also the Introduction and the Note from the panel). While salaries are considered acceptable by local standards, heavy workload is a big issue, as the panel learned in all its meetings with CAQA members.

CAQA's administrative office has seven staff members, including five officers supporting EQA processes (three on a full-time and two on a part-time basis), a financial officer and a secretary; a lawyer / office manager, employed by the MoESTD, was also available until summer 2017. Most of the administrative staff have worked since 2012; the recruitment of a new officer assisting in the preparation of reports was a major change in recent years. (SAR; Pre-visit clarifications) There is no incentive scheme for staff; they may get a day-off as a reward for good performance. The staff shortage could be at least partly addressed by re-distributing work among staff (uneven workload related to EQA processes in the individual fields of study). Career development opportunities for staff are limited as CAQA is bound by the regulations for the public sector. However, staff feel to be an important part of CAQA's activities, contributing to the revision of its EQA standards, annual reports and thematic analyses, and some also being involved in site visits and related preliminary report drafting, in addition to their regular tasks. As most of them have worked in CAQA for 5-7 years, their experience is often relied upon and increasingly appreciated by CAQA members. More training would be needed, though they occasionally participate in training and have attended some international events to establish links. (Meetings with CAQA members and staff)

CAQA's premises include three offices and a conference room in a state building, with IT equipment and access to the Internet. CAQA has its own website and IT system for the management of EQA processes; both have recently been improved (e.g. an option to monitor follow-up processes in the IT system; more reports and information available on the English-language website). (SAR)

On the one hand, the SAR states that CAQA has adequate human, financial and infrastructural resources to conduct its EQA processes efficiently, as evidenced by the scale of its activity; the SWOT analysis identifies professionalism, experience and commitment of CAQA's members and staff among its

strengths. A great majority of HEIs (87%) and academic experts involved in EQA processes (90%) consider CAQA's accreditation processes to be conducted 'very' or 'reasonably' efficiently (CAQA's 2017 survey findings published on its website). This was confirmed by the stakeholders interviewed.

On the other hand, the SAR acknowledges that resources are 'a constant challenge' and most of the weaknesses related to human resources in the 2012 SWOT analysis are yet to be addressed; the 2017 SWOT analysis points to an insufficient number and excessive workload of CAQA members, and a shortage of administrative staff. As noted under ESG 3.1, CAQA no longer reviews progress in the implementation of its Strategy due to its heavy workload. As the panel learned from CAQA members (see also ESG 3.6), IQA activities could not be expanded due to CAQA's limited capacity. For the same reason, CAQA is unable to provide 'refresher' training to experts (SAR). The MoESTD representatives interviewed stated that activities such as regular training for experts could be funded if they were included in CAQA's annual financial plan. There is a shortage of IT equipment, and what is in place is largely obsolete (Meeting with CAQA members). The SAR also refers to delays in payments made by the MoESTD, whose representatives emphasised, in turn, the need to adhere to protracted procedures. CAQA expects that the problem of under-resourcing will be solved when the new QA body is established by the recently enacted LoHE (SAR).

Analysis

The panel notes two positive developments since the previous review: the recruitment of a staff member assisting in the preparation of reports, which has reduced CAQA members' workload, highlighted as an issue by CAQA itself; and, in line with the 2012 recommendation, full integration of staff in CAQA's activities who also appear fully competent to support CAQA members in a wide range of activities, despite few training opportunities. Great commitment of both CAQA members and staff should also be highlighted as a big asset of the institution. The budget surplus indicates that CAQA has a sound pricing policy for its accreditation reviews.

Paradoxically, CAQA finds itself in a situation where, judging from the budget surplus, the funding available appears to be more than adequate, whereas the human resources are too limited and the infrastructure would need to be modernised. The panel has found evidence that CAQA does conduct effectively and efficiently its EQA processes, despite late MoESTD payments. However, it is also evident that this puts a heavy strain on both CAQA members and staff, in particular considering the number of EQA processes (see the Introduction), and the fact that CAQA members are extensively involved in these processes and, at the same time, have other duties in CAQA. While some analytical work is done (see ESG 3.4), there seem to be no human resources 'reserves' for other tasks which would help CAQA enhance its performance and push forward its development (e.g. strategic management, more robust IQA activities, and regular training for experts). As most of the CAQA members and the staff are in the office every day, the office space appeared to the panel quite modest, but it heard no complaints about that. Given the obsolete IT equipment, improvements made on the website and in the database for EQA processes indicate that CAQA makes a very good use of what is available.

The problem of adequate funding versus inadequate human and technical resources can be largely explained by external constraints (a limit set for the number of staff to be employed, protracted procurement procedures, etc.), but there also seems to be an issue with human resources planning and management. The 2012 recommendation to devise a human resources development strategy is yet to be addressed. In more general terms, the panel has found no evidence of human resources planning (see related comments under ESG 3.1). A review of the resources available, including both CAQA members and staff, against the tasks to be performed would show how the latter can be divided so as to ensure most efficient use of the former and facilitate planning. Multiannual planning is

unlikely, given the budget setting cycle, but annual planning would be necessary. The suggestion about the redistribution of workload among staff indicates that human resources management could also be improved; this does not seem to be related to the fact that CAQA no longer has an office manager.

In broader terms (though slightly extending beyond this ESG), the panel considers that the overall structure and the division of work between CAQA members and staff would need to be streamlined for CAQA to arrive at a more rational and sustainable human resources allocation. CAQA members combine a whole range of functions from experts to managers and staff of a QA agency, and there is no clear distinction between operational tasks performed by CAQA members and staff. Expert and other functions would normally be separated, with a committee of experts being supported by an administrative office or secretariat. Tasks such as those related to IQA of CAQA activities would usually be assigned to staff, though this means that CAQA would need to have a much bigger secretariat. These comments are meant mainly to support CAQA's further development in the coming years as the panel is aware that the issues could hardly be addressed within the current framework for CAQA's activities; the new QA agency to be established, with a Director, Board and CAQA as an 'expert body', offers much better prospects in this respect.

Panel recommendations

The panel recommends that CAQA enhance its resource planning and management to ensure that it makes best possible use of the resources available. See also the related recommendation about a bank account under ESG 3.3.

Panel conclusion: Substantially compliant

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.

2012 review recommendation: [...] CAQA should devote proper time and human resources to deal with the issues under [2005] ESG 3.8. [...] this should not only involve the CAQA members but the entire staff and the expertise it can provide, including e.g. financial prospects.

Evidence

Various aspects related to internal quality and professional conduct are addressed by CAQA's Policy of Quality and Code of Ethics, and the Standards of CAQA Work, all published on its website. The Policy aims to provide a framework for the establishment and assessment of CAQA's IQA system; it affirms CAQA's commitment to improve the quality of its activities and defines principles underlying the policy. The Standards include 16 standards for various aspects of activity (e.g. independence, decision-making, resources, IQA, EQA processes). As noted under ESG 3.3, the Code of Ethics defines rules of conduct, and cases considered, and sanctions for, a breach of the Code, and provides for the establishment of an ad-hoc Ethics Committee to deal with a breach; the Code is obligatorily signed by CAQA members, staff, academic experts, students and employers involved in EQA processes.

CAQA collects external feedback through surveys among HEIs (2011, 2015 and 2017), students (2011 and 2015) and academic experts (2017) (SAR; Meetings with evaluated HEIs, students and experts; Survey results on the CAQA website). The questionnaires have a number of common questions about

EQA processes and decisions (e.g. clarity and relevance of standards, efficiency in processes, decisions taken independently), impact of processes on quality improvement, and performance of CAQA members. The majority of stakeholders tend to give two highest ratings, and roughly 40 to 50% give the highest rating, in response to most of the questions. In 2017, CAQA members' performance was rated as 'very good' by 38% of HEIs, 'good' by 37%, 'satisfactory' by 15%, and 'bad' by 10% of HEIs (as compared to 0% in 2015); 'very good' and 'good' ratings were given, respectively, by 47% and 40% of academic experts; the proportion of students giving the two ratings increased from around 65% in 2011 to nearly 80% in 2015. The survey response rate in 2017 was lower than in previous years. CAQA is aware that surveys should be conducted more often but it does not have the capacity to do so. (Meetings with the SAR WG and the CAQA member responsible for IQA). As the panel learned from SCONUS and SOHS leaders, students are usually involved in EQA processes for a short time (arrangements for appointment by student parliaments on an annual basis, and graduation). All the stakeholders interviewed emphasised that they had many opportunities to give feedback in informal ways (meetings, visits to CAQA, phone calls, etc.).

As stated in the SAR, internal feedback is collected through a SWOT analysis involving CAQA members and staff, self-evaluation and discussions with staff. The staff interviewed also mentioned internal satisfaction surveys conducted by CAQA and the MoESTD several times a year.

The SAR states that findings from external stakeholder surveys are compared to identify trends, and survey findings, self-evaluations and SWOT analyses serve as a basis for internal discussion and reflection and for quality improvements. The 2017 stakeholder surveys did not reveal any issues for IQA within CAQA that could be addressed as comments in response to an open question focused on specific EQA standards. Improvements such as greater experience of staff and thematic analyses produced and aspects for improvement such as limited involvement of international experts were identified in the 2017 self-evaluation, as compared to the one in 2012 (Meeting with the SAR WG). The staff interviewed gave examples of specific improvements they had suggested which had been introduced (wider IT use in EQA processes; and deadlines for accreditation requests earlier submitted on a rolling basis); they feel that CAQA members are keen to get and act upon their feedback.

As suggested by some stakeholders, CAQA could provide greater technical support to HEIs and establish an IT system ensuring easy access to all reports from its EQA processes. While the main role in encouraging student engagement in EQA should be played by student parliaments, CAQA could also offer some incentives such as a certificate for those involved as a way of recognising the value of their work. As the panel learned from CAQA members, CAQA would appreciate honest critical feedback from its stakeholders.

Analysis

The arrangements under ESG 3.6 have remained unchanged since the previous review.

The Quality Policy, Standards of Work and Code of Ethics evidently show CAQA's commitment to assuring and enhancing the quality of its own activities. In the panel's view, the Code clearly explains what CAQA means by professional standards and integrity and the Standards offer further guidance. The Policy could not yet provide a meaningful framework for CAQA's IQA system as it focuses very much on values and principles and does not refer to any mechanisms underpinning the system (e.g. for feedback collection, self-analysis and self-assessment, and follow-up action).

While HEIs and academic experts appear to be satisfied with the arrangements in place, the panel considers that mechanisms for external feedback collection would need to be much more robust; it is encouraging that CAQA is well aware of this and the responsible member has various other good ideas

to improve the IQA system. In the panel's view, surveys enable CAQA to collect some data which could help enhance its performance or encourage further 'probing' (see the example given above), and the publication of findings on the website shows that CAQA seeks to demonstrate its accountability. However, as the only formal mechanism, surveys are conducted too infrequently. They should normally be conducted among evaluated HEIs and external experts (academic experts, students and employer representatives) after each review / audit; otherwise, a QA agency has no formal way to learn about the conduct of a process and performance of a site visit panel and, thus, no real basis to address issues which may arise on an ongoing basis. In CAQA's case, the panel considers that feedback should be collected from all those involved after each review / audit but CAQA could develop a shorter questionnaire for academic experts, students and employers, given their limited involvement in processes. The three groups of experts could then be canvassed for views on a broader range of issues once a year; this would be important, in particular, considering that students participate in processes only for a short time. The panel is aware of CAQA's heavy workload (see ESG 3.5), but there is a wide range of free or low-cost software which would do a large part of the job in processing survey data. Further, while the survey response rates have dropped, the stakeholders seem to rely too much on feedback given informally; CAQA could seek to encourage a 'cultural change' in this respect.

Similarly, internal feedback collection relies too much on informal daily exchanges; staff surveys are indeed commendable; there is, however, no such mechanism, addressing both management and EQA-related activities, for CAQA members, while they are the ones who do the core work. The SAR refers to a SWOT analysis and self-assessment, but these have been conducted only every five years as part of an ENQA external review. CAQA would need to engage in self-analysis both regularly and more frequently (e.g. on an annual basis), using external and internal feedback collected, and have a formal mechanism for this. See also comments on the self-assessment process in the Introduction.

The panel also notes that CAQA does not have any formal mechanism to act upon the external and internal feedback collected. It gathers from the interviews held that CAQA receives from its stakeholders very few suggestions on possible specific improvements (except in EQA standards); thus, it is difficult for it to find examples demonstrating its responsiveness to feedback. However, judging from the examples of changes given by CAQA staff, the interview with the CAQA member responsible for IQA and the panel's discussions on the recent revision of EQA standards (see ESG 2.2), there is genuine willingness in CAQA to listen, learn and improve.

The survey ratings quoted above and the very positive feedback from stakeholders on CAQA's overall performance given in various interviews show that, despite gaps in the IQA system, the high standards of the Code of Ethics are put into action. However, a formalised approach to IQA is particularly important in CAQA's case as its members perform a double role, overseeing the work of the institution and being the core people doing the work. An action plan to develop a fully-fledged IQA system would need to be devised, with clear milestones for CAQA to check progress.

Panel recommendations

The panel recommends that CAQA (1) devise an action plan for the development of its internal quality system, and (2) put in place formal mechanisms for gathering external feedback after each accreditation review and audit and internal feedback on a regular basis, and for following up on internal and external feedback collected.

Panel conclusion: Partially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

Evidence

CAQA is not explicitly required by LoHE to undergo a (cyclical) external review but should ensure that its standards and procedures are consistent with those of the EHEA. CAQA's Policy of Quality and the Standards of CAQA Work state that it should conduct its activities in accordance with the ESG.

This is the second ENQA-coordinated external review of CAQA. As a result of the first review in 2012, CAQA was granted full membership of ENQA in 2013 and entered on EQAR in 2014. The present review has been initiated by CAQA with a view to confirming its ENQA membership and renewing its registration in EQAR.

Analysis

The panel confirms that CAQA undergoes periodic external reviews as recommended by this ESG. Both the national legislation and CAQA's internal regulations also evidently demonstrate commitment to translate ENQA's standards into practice.

Panel conclusion: Fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2012 review recommendation: *[The] panel recommends that CAQA gives support to higher education institutions in their efforts to fully implement the internal quality assurance processes for their own sake, and not just in anticipation of the external quality assurance. Next, CAQA's work should focus strongly on the fact that the institutions themselves have the primary responsibility for the quality of their study programmes and the related actions. [...] One consequence would be that external quality assurance could change from a quality control to quality enhancement [...].*

Evidence

CAQA developed its standards in 2006, based on the 2005 LoHE and the 2005 ESG, and revised them slightly between 2008 and 2015 in response to amendments in LoHE and requests from stakeholders; for example, it defined more precisely conditions for the establishment of HEIs, and introduced a Transparency standard (public availability of programmes and theses) for the PhD level to tackle the issue of plagiarism. (SAR) In 2016, the standards still in place at the time of the review, and discussed below, were revised to adjust them to further amendments in LoHE and the 2015 ESG and integrate past experiences. The revised standards were published in September 2017 and will be introduced for applications from HEIs based on new templates (SAR; Pre-visit clarifications); see Additional observations.

Currently, CAQA has separate standards for initial institutional accreditation, periodic institutional accreditation, periodic programme accreditation, and audits. Initial accreditation reviews of programmes (at both new and existing HEIs) are based on the standards for periodic reviews. There are only slight differences between the standards for first-/second-cycle and third-cycle programmes (11 common standards; distance learning as an additional one for the former; transparency as an additional one for the latter). Audits are based on general standards related to methodology (e.g. use of HEIs' self-evaluations, procedure, reporting) and on the standards for self-evaluation conducted by HEIs. (CAQA's internal regulations for each process, as listed in Annex 4 to this report; SAR).

The SAR maps the Part 1 ESG onto CAQA's standards for all processes (see below) and discusses the compliance of the standards with the ESG only for periodic institutional accreditation and programme accreditation. It does not identify any gaps between the Part 1 ESG and CAQA's standards.

The panel had discussions on how student-centred learning (SCL) was addressed by the standards with those involved in EQA processes. For some interviewees, SCL is about providing students with knowledge they will need for successful employment; it is addressed, in particular, by the standards on programmes (workload distribution, ECTS, independent work), learning and teaching facilities and teaching staff, and student involvement in self-evaluation. For others, SCL is covered by the standards concerning programmes, teaching methods and student assessment (what is included in the final grade, etc.). Some emphasised that students were increasingly put at the centre of learning, and all aspects relevant to them (programmes, literature, facilities, and quality control) were incorporated into the standards. (Meetings with CAQA members, experts and students) Recognition of qualifications based on the Lisbon Convention is not addressed by the standards (Final clarification meeting).

As explained by CAQA members, the effectiveness of IQA systems at HEIs is assessed mainly through outcomes achieved by graduating students, and each HEI is required to have a QA body and plan and report on QA activities; student involvement in IQA is very important. For the representatives of evaluated HEIs interviewed, CAQA's EQA processes are very useful in that the standards provide a structure which HEIs have to follow and the processes identify standards which they do not meet and should do so. As the panel also learned in its discussions, 'surprise checks' would be helpful between the cycles of EQA processes.

In response to the 2012 recommendations, the SAR explains that CAQA's thematic analyses show progress made in building quality culture between the first and second accreditation cycles, and that CAQA will focus more in the future on the development of IQA in HEIs and gradually shift from accreditation to auditing only. The newly enacted LoHE provides for less frequent accreditation reviews (seven years) and more frequent audits (four years) (Final clarification meeting).

The panel has examined CAQA's EQA standards, guidelines and report templates for HEIs and academic experts, and eight reports to see how the individual Part 1 ESG and, in more general terms, the effectiveness of IQA are addressed.

Analysis

In the panel's view, CAQA's mapping table may be slightly misleading as the standards (including guidelines) for the individual processes address Part 1 ESG to varying degrees (and some additional and / or more relevant ones were also included by the panel in the table below). While all processes fully embrace ESG 1.6, the standards for accreditation reviews focus on few selected aspects of Part 1 ESG, and those for audits cover the ESG quite comprehensively. The panel considers that this is fully justified as institutional and programme accreditation reviews serve the purpose of checking

compliance with minimum requirements, whereas audits aim at quality enhancement and, thus, all processes are complementary, and audits are conducted between periodic accreditation reviews.

The standards for audits fill in 'gaps' in those for accreditation reviews and integrate the contents of the ESG except for very few aspects. External stakeholder involvement (ESG 1.1) would need to be integrated not only for programmes, as now, but also for QA policy and overall QA activities. Academic integrity and fraud (ESG 1.1) could feature more strongly, not only with regard to the PhD level, and the standards would need to refer explicitly to a student complaint procedure (ESG 1.3), and recognition of qualifications based on the Lisbon Convention, study periods, prior learning and non-formal and informal learning (ESG 1.4). Unlike ESG 1.7, the corresponding standards do not define precisely the kind of data to be collected for management purposes. The panel also notes that student involvement in IQA is very comprehensively covered by the standards (strategy, structures, development of standards and procedures, programme review, and self-evaluation). At the same time, while the standards do indeed capture various aspects of SCL, the panel believes that it would be a good idea for CAQA members, experts and students to have a joint discussion on how SCL could be addressed consistently in EQA processes. The panel also felt that issues related to recognition could have been, in general, given more consideration in CAQA's internal discussions on compliance with the ESG.

Judging from the standards, guidelines for experts, the sample of reports available to the panel and the interviews, CAQA's processes, including audits, focus quite strongly on IQA-related documents, bodies, procedures and mechanisms in place at HEIs. They would need to give more consideration to the effectiveness of IQA: whether what is in place does indeed work effectively and contribute to quality enhancement. This is particularly important as it is quite evident from the panel's meeting with representatives of HEIs that rather than taking themselves the responsibility for quality, they look to CAQA to identify weaknesses and push through improvements. Such a fundamental cultural change may indeed be encouraged by more frequent audits provided for in the newly enacted LoHE, but CAQA would need to support HEIs in this process through re-focused audits and training sessions, as also recommended by the 2012 review panel. See also related comments under ESG 2.2.

Table 1: ESG Part 1 mapped onto CAQA's standards in the SAR (with additional and / or more relevant standards identified by the panel in brackets)

Process	Initial institutional accreditation	Periodic institutional accreditation	Initial and periodic programme accreditation*	Self-evaluation as a basis for audit
ESG 1.1	Standards 1 (HEI's objectives and tasks); 12 (IQA mechanisms)	Standards 1 (Goals and objectives); 12 (IQA mechanisms)	Standard 11 (Quality control)	Standards 1 (QA strategy); 3 (QA system) (<i>Panel: additionally, Standards 2 (QA standards and procedures) and 8 (with regard to discrimination)</i>)
ESG 1.2	Standards 3 (Programmes/Studies); 4 (Research)	Standards 4 (Programmes/Studies); 5 (Research)	Standards 1 (Programme structure); 5 (Curriculum); 6 (Quality, modernity and international comparability); 12 (Distance learning)	Standards 4 (Quality of programmes); 6 (Quality of research / artistic / professional activities) (<i>Panel: additionally, Standard 3 with regard to student involvement in programme design</i>)
ESG 1.3	Standards 3 (Programmes/Studies); 8 (Students)	Standards 4 (Programmes/Studies); 8 (Students)	Standards 4 (Graduate competences); 5 (see above); 8 (Student assessment and progression)	Standards 4 (Quality of programmes); 5 (Quality of the teaching process); 8 (Quality of students)
ESG 1.4	Standard 8 (Students)	Standard 8 (Students)	Standards 7 (Student admission); 8 (Student assessment and progression)	Standards 8 (Quality of students)
ESG 1.5	Standards 4 (Research); 5 (Quality of teaching staff); 6 (Requirements for teaching staff)	Standards 5 (Research and artistic activities); 6 (Teaching staff)	Standard 9 (Teaching staff)	Standards 6 (Quality of research / artistic / professional activities); 7 (Quality of teaching staff)
ESG 1.6	Standards 7 (Non-teaching staff); 9 (Facilities); 10 (Library resources and IT); 11 (Funding)	Standards 7 (Non-teaching staff); 9 (Facilities); 10 (Library resources and IT); 11 (Funding sources)	Standard 10 (Organisational and material resources)	Standards 9 (Quality of library resources and IT facilities); 10 (Quality of HEI management and non-teaching support); 11 (Quality of facilities); 12 (Funding)
ESG 1.7	Standard 2 (Organisation of HEI)	Standards 2 (Planning & monitoring); 3 (Organisation & administration)	Standard 11 (Quality control)	Standards 3 (QA system); 10 (see above); (<i>Panel: additional / more relevant: Standards 1 (QA strategy), 2 (QA standards and procedures) and, in particular Standard 14 (Systematic surveillance and periodic quality control)</i>)
ESG 1.8	<i>Available after a positive decision</i>	Standard 13 (Transparency)	2 (Programme purpose); Standards 9 (Teaching staff); (<i>Panel: additionally, 12 (Transparency: 3rd cycle programmes)</i>)	Standards 1 (QA strategy); 2 (QA standards and procedures); 4 (Quality of programmes); 7 (Quality of teaching staff) (<i>Panel: additionally, Standard 5: Quality of the teaching process</i>)
ESG 1.9	Standard 12 (IQA mechanisms)	Standard 12 (IQA mechanisms) (<i>Panel: additionally, Standards 4 (Programmes/Studies) and 5 (Research and artistic activities)</i>)	Standard 11 (Quality control)	Standards 1 (QA strategy); 2 (QA standards and procedures); 3 (QA system); (<i>Panel: more relevant, Standards 4, 5 and 13 (see above)</i>)
ESG 1.10	Periodic accreditation after one year required by LoHE	Required by LoHE	Required by LoHE	Required by LoHE

*Both initial and periodic accreditation programme reviews based on the same standards.

Panel commendations

The panel commends CAQA for addressing very comprehensively student involvement in internal quality assurance as part of its standards for audits.

Panel recommendations

The panel recommends that CAQA (1) amend slightly its audit standards so that they embrace all aspects of ESG 1.1, 1.3, 1.4 and 1.7, and have a discussion with academic experts, students and employers participating in processes to arrive at a common understanding of how student-centred learning and recognition should be addressed; (2) refocus audits more towards the effectiveness of internal quality assurance; and (3) provide greater support for HEIs to take the primary responsibility for quality.

Panel conclusion: Substantially 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.

2012 review recommendations: *(1) For the future revision of quality assurance processes CAQA should focus on stronger stakeholder involvement beyond the well-addressed academic community. [...] there is no routine engagement of representatives from the labour market, professional bodies [...]. (2) The [...] panel recommends limiting the roles of CAQA members to decision making. In other words, they should not be involved in sub-commissions [as part of EQA processes] and other procedural activities. This would free them to focus on planning and strategic monitoring, as well as the further development of CAQA's own procedures, in cooperation with higher education institutions. (3) [...] various sets of standards, rules and regulations provide a valuable basis for CAQA's work. However, for reasons of further clarity and comprehensibility it might be worth considering a revision of these documents, also based on the experience gained so far.*

Evidence

The overall aims of CAQA's processes are defined in LoHE. Accreditation reviews aim to assess compliance with minimum standards and conditions laid down in LoHE (types and minimum number of programmes for the individual types of HEIs; number, qualifications, mode of employment and workload for teachers, etc.). Audits are intended to assess whether HEIs comply with their QA obligations, and are geared towards quality enhancement.

LoHE also requires that external academic experts involved in CAQA's processes remain anonymous.

This has a bearing on the design of CAQA's processes as, consequently, academic experts only assess documentation submitted by HEIs and produce preliminary reports, integrated by CAQA into its final reports (SAR). The involvement of students and employers as experts is not explicitly addressed by LoHE; in practice, they are involved only in site visits and comment on site visit reports. CAQA members have a double role in EQA processes; they are directly involved in processes (analysing documents submitted by HEIs, taking part in site visits, drafting final reports which provide the basis for decisions) and, at the same time, are a decision-making body. (SAR; Meetings with all groups concerned;

for details, see ESG 2.3-2.6). In response to the 2012 recommendations, CAQA suggested changes in the new LoHE to reduce the workload of its members so that they can focus on strategic planning, and has involved employer representatives in its processes since 2013 (SAR).

The SAR refers to the small size of the academic community in Serbia as the reason behind anonymity of experts. As the panel learned from MoESTD representatives, the requirement for academic experts to be anonymous had been introduced in the 2005 LoHE to protect the system and improve quality; anonymity is not mentioned in the newly enacted LoHE. CAQA members see themselves primarily as experts / reviewers and 'the core' of the peer review system, and much less as those taking decisions (SAR; Meeting with CAQA members). Most of the experts that the panel met consider that anonymity allows experts to express their opinion freely, without any constraint, and ensures objectivity. Few believe that it would be useful to participate in site visits as a lot of relevant information could be gathered in direct contact with staff and students, and it would be easier to draw reliable conclusions, but it would take time for the academic community to accept that.

Pursuant to LoHE, CAQA's standards and procedures are approved by the NCHE, composed mainly of representatives of HEIs; the remit of CONUS and COHS includes providing advice on standards for quality evaluation of education, research and other activities of HEIs; and SCONUS and SCOHS may appoint representatives to take part in the NCHE's work related to CAQA's standards and procedures. The SAR states that CAQA's methodologies, developed in 2006-2007, have been revised since then in consultation with HEIs, students and labour market representatives. They have been discussed as part of public debates initiated by CAQA, the NCHE, CONUS and COHS, and conferences for HEIs. In their meetings with the panel, all stakeholders, including representatives of SCONUS and SCOHS and the labour market, gave examples of various fora (public debates, regular meetings, joint committees, etc.) through which CAQA sought their views on its standards, and of changes they suggested; except in very few cases, suggestions were taken on board by CAQA.

According to 41% of HEIs (2017), slightly more than 50% of students (2015) and over 30% of academic experts (2017), accreditation reviews contribute to a 'very' large extent to improving the quality of programmes (CAQA's survey findings published on its website). The representatives of evaluated HEIs interviewed consider that CAQA's processes are 'costly' (in terms of real costs) and 'time-consuming' but, at the same time, very useful for quality improvement. Improvements in terms of space (square metres per student) and teaching and learning facilities, incl. equipment, and student-teacher ratios were given as most typical examples by both CAQA members and HEIs. Single HEIs referred to more information relevant to students published on the website or student performance and graduate employment monitoring introduced in response to CAQA's recommendations. CAQA also mentioned problems such as members of HEI governing bodies remaining in office beyond the statutory term and the retirement age not respected by academic as those rectified by its processes. Both CAQA members and HEIs confirmed that improvements were taken into consideration by CAQA in the next cycle.

Overall, CAQA has given a negative opinion on 62% of initial accreditation applications (new HEIs and their programmes) so far; in the second accreditation round (2012-2016), almost 12% of HEIs and 21% of programmes received an 'act of warning', and 5% of programmes were not accredited; as a result of the first audit cycle (2011-2015), 3% of HEIs were subject to the follow-up procedure (the panel's calculations based on data provided before the visit and in the SAR). CAQA's accreditation reviews have detected cases of unauthorised award of PhD degrees at 9 of 10 private universities and, due to such problems, an 'act of warning' was issued in 67 cases (SAR).

Analysis

The aims and objectives of CAQA's processes are predefined by the national legislation and appear to be widely accepted among the stakeholders. It is also clear to the panel from its analysis of the documentary evidence that CAQA's EQA methodologies are firmly based on the legislation. In the context of the aims, the panel notes, though, that its discussions with representatives of HEIs tended to drift towards accreditation and the term was often used as referring to all CAQA's processes. While all the processes make up a whole and the term as such is not of primary importance, it would be important that HEIs do not lose sight of quality enhancement as the primary aim of audits, as opposed to compliance with minimum requirements addressed by accreditation reviews (see also below).

The panel confirms that the stakeholders are involved in the development and revision of CAQA's standards and appear to be satisfied with the opportunities to provide feedback. Involvement of some stakeholders (NCHE, CONUS and COHS, SCONUS and SCOHS) is 'built into' CAQA's approach by the LoHE obligations, but the interviews also clearly show that CAQA genuinely engages in discussions with the stakeholders and is responsive to the feedback received. The procedures for EQA processes do not leave much space for consultations insofar as they are largely predetermined by the legislation (accreditation and audit cycles, the anonymity of experts and its implications, etc.). In any case, the representatives of HEIs interviewed did not suggest any changes in the procedures. The panel also notes that, while CAQA's processes, unavoidably, create some burden for HEIs, there is, overall, a reasonable balance between their costs and benefits, as perceived by HEIs. There is, further, just little overlap between accreditation reviews and audits, judging from the standards for each process and reports. And, as recommended under this ESG, the processes are designed so that they lead to clearly defined outcomes and a follow-up (see ESG 2.3, 2.5 and 2.6).

In line with the 2012 recommendation, labour market representatives are now involved in the development of CAQA's standards and to a greater extent than before in its processes (see ESG 2.4). There still is, however, a key 'systemic issue' where the overall design of CAQA's methodologies does not follow the letter or spirit of the ESG. The ESG refer to external experts, including academics, students and employer representatives, as having a central role in EQA processes, and it is assumed that they are external not only to evaluated HEIs but also to the QA agency which takes decisions based on reports from experts. In CAQA's case, the agency both does the core peer-review job, at least to a large extent, and takes decisions, whereas the involvement of external experts is very 'selective' as limited to one stage in a process. This issue has implications also for CAQA's compliance with ESG 2.3, 2.4 and 2.6. It could be tackled for the new QA body to be established by the recently enacted LoHE since, as the panel understands from the MoESTD representatives, it does not contain provisions about the anonymity of experts. However, as the panel understands from its interviews, their anonymity is also a sensitive issue. Change is likely to meet with resistance, but this could be addressed, like in other smaller European countries, by involving international experts to a much larger extent than now (see ESG 2.4). For comments on planning and management functions, referred to in the 2012 recommendation, see ESG 3.1 and 3.5.

The panel has found ample evidence (statistics on outcomes of CAQA's processes and examples of improvements above, and data in the thematic analyses, see ESG 3.4) that accreditation reviews are designed so as to be fully fit for their purpose, and their crucial role in Serbian higher education cannot be overestimated (see ESG 3.1). At the same time, judging from the examples of improvements given, these aspects seem to dominate CAQA's processes and, with only one cycle of audits completed, it may be too early to see how they contribute to quality enhancement, beyond improving the basic conditions for quality education (see related comments under ESG 3.4). In the panel's view, they allow

HEIs to assess and demonstrate improvement, but they would serve their purpose better if refocused more towards qualitative aspects, and towards effectiveness of IQA, as suggested under ESG 2.1.

Finally, the panel agrees with the 2012 recommendation that CAQA's internal regulations on EQA processes would benefit from revision for full clarity, consistency and readability, though it has found no evidence that the design of processes or related procedures are not clear to HEIs. To give an example, CAQA's Rules of Procedure, as its main internal regulation, define a procedure which includes a site visit and would appear to apply to all EQA processes, whereas a site visit is not, in fact, part of a periodic programme accreditation review unless combined with an institutional review and in other specific cases (see ESG 2.3). This is not further clarified in more detailed regulations on the processes, and it is an established practice rather than a clearly defined rule that periodic institutional and programme accreditation reviews are conducted together.

Panel recommendations

The panel recommends that CAQA (1) devise, in cooperation with the national authorities, arrangements where its members do not combine the role of a body taking decisions with the role of key external experts, and where they focus on the former role in line with the spirit of the ESG; (2) place a stronger emphasis on quality improvement in its processes; and (3) amend its internal regulations to ensure full clarity and consistency. For a related recommendation about expert involvement, see ESG 2.4.

Panel conclusion: Partially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

2012 review recommendation: *CAQA is advised to develop more structured and systematic follow-up procedures. The follow-up should focus on whether CAQA's recommendations are dealt with appropriately and the required action plans are properly prepared and implemented by the institutions and/or by the study programmes [...].*

Evidence

CAQA has adopted a number of internal documents for its processes, including the Rules of Procedure, internal regulations on the standards and procedures for each process, and site visit protocols for the relevant processes (see a full list in Annex 4). LoHE predetermines CAQA's procedures insofar as it states that self-evaluation should be conducted by HEIs at least every three years and provide the basis for audits, and outcomes of HEIs' self-evaluations and CAQA's audits should be taken into account in accreditation decisions. HEIs' self-evaluation reports are taken into consideration in periodic institutional accreditation reviews and audits (CAQA's internal regulations; SAR). They are not taken into account in programme accreditation as there are no standards for programme self-evaluation; HEIs conduct

internal programme reviews in line with the programme accreditation standards; and institutional and programme accreditation reviews are usually conducted together (Pre-visit clarifications).

CAQA has organised training for HEIs entering a given accreditation cycle, and training for all HEIs on self-evaluation. Briefing sessions are held for individual HEIs, if they wish so, six months before a review / audit. (SAR)

An initial accreditation process for a newly established HEI combines an institutional and programme review. A sub-commission composed of CAQA members analyses documents submitted by an HEI with regard to compliance with several threshold standards. If they are not met, CAQA gives a negative opinion to the MoESTD. Where they are met, the next stages include assessment of the documentation by two external academic experts, each producing an individual report on compliance with the standards; a site visit undertaken by two CAQA sub-commission members which ends with a report; and an overall report produced by the CAQA sub-commission which integrates findings from experts' reports and the site visit report, and which provides the basis for CAQA's decision. The site visit (approx. 3 hours) includes meetings with the HEI management, programme heads and non-teaching staff, a tour of facilities, and a final meeting. A new HEI and its programmes are subject to periodic accreditation after one year. Reviews of new programmes at existing HEIs are conducted in accordance with the procedure for periodic programme accreditation (see below); as CAQA members explained during the visit, they do not comprise a site visit unless an HEI intends to establish a programme in a different location / town.

In a periodic institutional accreditation review, external academic experts (three for a university; two for a faculty operating as a legal entity) assess an HEI's self-evaluation report and other documents, each delivering an individual report on compliance with the standards; a panel composed of at least two CAQA sub-commission members, a student and an employer undertakes a site visit, ending with a report drafted by the CAQA members, with comments from the student and employer; and the CAQA sub-commission concerned drafts an overall report, integrating findings from the experts' and site visit reports, for CAQA to take a decision. A site visit (6 to 8 hours) includes meetings with the HEI management, self-evaluation team, programme heads and non-teaching staff, students, other staff holding management positions (e.g. finance, library, IT); a tour of facilities; and a final meeting; additional documents are also collected.

The procedure for periodic programme accreditation reviews includes: assessment of the documentation from an HEI by two external academic experts (an additional one for distance learning), each producing a report on compliance with the standards; and a report prepared by a CAQA sub-commission, integrating findings from experts' reports, which serves as the basis for CAQA's decision. The SAR explains that there is no site visit in the procedure as most institutional and programme accreditation reviews take place at the same time; in both processes, site visit panels, set up for institutional reviews, discuss programmes with programme coordinators and students and have an insight into resources / facilities for every programme, so a separate visit for a programme 'would be a waste of time and resources'. No site visit is undertaken if an HEI applies for a programme accreditation in-between regular accreditation cycles, as the panel learned from CAQA members during the visit.

CAQA has a kind of a built-in follow-up process for HEIs and programmes which have received an 'act of warning' as an outcome of a periodic review (for possible outcomes, see ESG 2.5). HEIs are required to address the shortcomings identified and submit revised documentation within a timeframe set by CAQA (between one week and six months, depending on the type and number of shortcomings). On this basis, CAQA takes a final decision and prepares a final report.

The procedure for audits consists of the same main stages, including a site visit, as for periodic institutional accreditation reviews. A follow-up process for audits has been introduced to address the 2012 review recommendation (SAR). It is initiated where a self-evaluation has not been conducted in accordance with the standards and / or significant issues have been identified as a result of an audit. HEIs are required to design an action plan to implement recommendations and submit, within six months, a report which provides the basis for CAQA's final report and decision; if necessary, a site visit is undertaken before the final decision.

Site visits as part of both accreditation reviews and audits serve primarily the purpose of validating evidence provided in documentation submitted by HEIs, but HEIs also usually discuss various problems with site visit panels. When CAQA members know an HEI well, they do not need more time for a visit than planned in the Site Visit Protocol, but their duration is often longer than indicated in the Protocols (for the nominal duration, see Evidence). An interview with students is conducted only by a student member of the site visit panel so as to ensure an open and frank discussion, which is highly appreciated by students. (Meetings with CAQA members and students involved in EQA processes). In their meeting with the panel, representatives of evaluated HEIs stated that CAQA should have more members, only two representatives of colleges in CAQA were 'not enough', and some subject (sub-)areas were not represented by CAQA members, especially within the broad area of social sciences.

To ensure consistency in its processes, CAQA has templates for HEIs to prepare documentation, templates with guidelines for external academic experts conducting assessment as part of each process and Site Visit Protocols (see the list in Annex 4 to this report). The representatives of evaluated HEIs interviewed stated that CAQA's processes were conducted consistently. There are sometimes great variations between scores given by academic experts in their reports or the highest scores are not justified by comments; where problems are detected by the CAQA sub-commission concerned, facts are verified during a site visit or, where necessary, an additional expert is hired (SAR; Meeting with the CAQA member for IQA). The experts that the panel met receive all the training and guidelines they need for their job; briefing given by CAQA is also fully sufficient for students and employers involved in EQA processes to know how they should do their job. For further details, see ESG 2.4.

Analysis

The panel confirms that CAQA conducts pre-defined EQA processes and the regulations describing the related standards and procedures are published on its website. As noted under ESG 2.2, the documents could more clearly define the rules for conducting site visits as part of programme accreditation reviews to make the process more transparent. Nonetheless, the survey findings quoted earlier and the panel's interview with representatives of evaluated HEIs show that processes are conducted professionally and, as mentioned under ESG 3.6, CAQA's Code of Ethics clearly defines high professional standards and those involved undertake to adhere to it. Judging from the feedback from experts, the guidelines for them are fully sufficient for them to know how to do their job properly.

A self-evaluation by an HEI is a regular process rather than the first stage of an audit or periodic accreditation review. The panel does not see any issue here as, overall, EQA processes are conducted quite frequently and evidence on recent developments can be collected during site visits as part of periodic institutional accreditation reviews and audits. There is no self-evaluation linked to a periodic programme accreditation review. This is indeed balanced by the practice of conducting jointly institutional and programme accreditation reviews; nonetheless, in the panel's view, some aspects of self-evaluation related to programmes (e.g. Standards 4, 5, 7 and 9) could be usefully taken into consideration where a programme review is not combined with an institutional one.

Initial accreditation of HEIs and their programmes, periodic institutional accreditation and audits follow ESG 2.3 insofar as they comprise an assessment which is external to an HEI, including a site visit, and lead to a report. This is, however, where the 'systemic issue' highlighted under ESG 2.2 comes into play: only the preliminary part of the external assessment is done by external academic experts; a site visit is conducted by CAQA members, though accompanied by a student and an employer representative; and a final report is drawn up by CAQA members, though integrating academic experts' assessments. Related to this, there are only 17 CAQA members, which, as confirmed in the interviews, does not ensure a fully adequate representation in terms of the types of HEIs and subject areas, regardless of how overall competent CAQA members are. In the panel's view, this limits, at least to some extent, potential usefulness of a site visit as an opportunity for expertise sharing between an HEI and experts; this is important as even though a visit aims mainly to validate documentary evidence, it is also taken by HEIs as an opportunity to seek advice from panel members, as explained by CAQA members.

The panel confirms that the protocols for site visits include meetings with all relevant stakeholders, as recommended under this ESG. The arrangement where only students interview students is indeed worth highlighting as a guarantee of open exchanges. The duration of a site visit appears sufficient for initial accreditation and periodic institutional accreditation reviews, given their scope. It seems, however, too short for audits considering the range of issues addressed by the standards. The panel also believes that the process would be more useful for HEIs if a site visit aimed not only at validating documentary evidence but also at providing HEIs greater support in the development of IQA and assessing its effectiveness (see the related comments under ESG 2.1 and 2.2).

In the panel's view, a site visit would not be necessary to make initial accreditation of programmes at existing HEIs, aside from when it is now undertaken, a reliable process since much of what it checks is based on documentation; a tour of facilities might be useful, though, considering that space and facilities seem to be a quite common problem (see ESG 3.1). A visit should, however, be part of a periodic programme accreditation review in all cases.

CAQA has addressed the 2012 recommendation by introducing a structured follow-up for audits revealing significant issues, in addition to a previously existing follow-up for 'acts of warning' in accreditation. As accreditation reviews alternate with audits, CAQA visits HEIs at shorter intervals than is the case in many other systems. Thus, it can see progress made in the implementation of its recommendations by successfully accredited and / or audited HEIs and programmes and, as the stakeholders assured the panel, this is indeed done. Aside, however, from site visits, there is currently no way for HEIs to report on progress as there is no space for this in the templates for accreditation documentation or self-evaluation reports. To address this, CAQA would need either to amend accordingly its templates or introduce a short progress report.

CAQA's approach to initial and periodic programme accreditation reviews is not fully consistent as a site visit is not conducted in all cases, though, as noted above, this is more of an issue for periodic than for initial accreditation reviews. The templates and guidelines produced contribute to consistency in processes, as does, in fact, the central role played by CAQA members in each process. Inconsistencies in experts' assessments spotted by CAQA may not necessarily be of decisive importance for the overall consistency in the implementation of processes as CAQA members verify the accuracy of experts' assessments during site visits. Nonetheless, the panel believes that typical strengths and weaknesses justifying individual scores could be identified in the guidelines for experts to help further increase consistency, without interfering with independence of academic judgement. Though no such suggestion was made by students, CAQA could also ask SCONUS and SCOHS if any written guidelines would help newcomers address consistently all relevant issues, in particular because, as mentioned earlier, there is a high 'turn-over rate' in the pool of students.

Panel recommendations

The panel recommends that CAQA (1) revise its procedures to include a site visit as part of each periodic programme review; and (2) devise a way for HEIs to report on progress in the implementation of its recommendations as part of existing or new arrangements; (3) consider developing guidelines on scoring for academic experts to ensure greater consistency in their approach to assessment. Involvement of CAQA and external academic experts in line with the ESG is addressed by recommendations under ESG 2.2 and 2.4 respectively.

Panel conclusion: Partially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2012 review recommendation: *The panel recommends that CAQA focus on stronger stakeholder involvement from the labour market. The engagement of representatives from the labour market, professional bodies should become routine.*

Evidence

Aside from CAQA members having a central role as experts (see ESG 2.2 and 2.3), three groups of experts participate in CAQA processes: academic experts (referred to as ‘reviewers’ in LoHE and CAQA’s documents), and students and labour market representatives (not referred to as experts in LoHE or CAQA’s documents). Since, as mentioned earlier, academic experts should remain anonymous (LoHE), they carry out assessment based solely on documentation submitted by HEIs; they do not take part in site visits or contribute to final reports, though their assessments are taken into account in CAQA’s final reports. National academic experts (in total, 721) are involved in all processes, and international experts (17) occasionally in periodic PhD programme reviews. Delays in payments made by the MoESTD and limited funding coupled with high translation costs are the main reasons behind limited involvement of international experts; thus, where possible, CAQA uses international experts living in Serbia or Serbian-speaking academics living abroad. Students (in total, 50) and employer representatives (since 2013) take part in periodic institutional accreditation reviews (and periodic programme reviews insofar as these are usually combined with institutional ones; see ESG 2.3) and audits as members of site visit panels who also comment on CAQA’s site visit reports. (CAQA’s internal regulations; SAR; Pre-visit clarifications; List of reviewers; Meetings with students and employers)

As explained under ESG 2.2, most of the academic experts interviewed would like to remain anonymous and are satisfied with the current level of their involvement in CAQA processes. As the panel learned from students, during site visits, they interview students and, overall, focus on student matters (involvement in decision-making and IQA, etc.); they would like to be involved in ‘non-student’ matters on a regular basis too, and CAQA has promised to address that. Employers, as their representatives explained, focus on issues related to links between higher education and the labour market. Students and employers comment on site visit reports which are drafted by the CAQA members involved. The representatives of evaluated HEIs and international experts interviewed believe it would be a good idea to involve more international experts, especially for PhD programmes, to support national

experts; working with outsiders would encourage change and would be important for international standard development.

CAQA recruits academic experts for its pool through an open call (LoHE) or at the recommendation of its relevant sub-commission if a call fails to attract a sufficient number of candidates (CAQA's Rules of Procedure). Applications (a form available on the CAQA website) are assessed by the relevant CAQA sub-commission and candidates approved at a CAQA meeting (Rules of Procedure). Students are selected by SCONUS and SCOHS and employer representatives by the Serbian Chamber of Commerce; CAQA receives lists of nominees. Experts, students and employers for individual reviews / audits are pre-selected from the pool / lists by the relevant CAQA sub-commission, in consultation with SCONUS and SCOHS in the case of students, and approved by CAQA. Selection is based on expertise, the type of HEI subject to a review / audit, and the principle that an academic expert and student should not come from the HEI concerned. All three groups sign the Code of Ethics, as mentioned earlier. (SAR; Pre-visit clarifications; Meetings with experts, SCONUS and SCOHS, students and employers)

Guidelines and report templates for academic experts have been available since 2013. Since 2007, CAQA has organised 20 seminars for academic experts in all big academic centres, especially for the first accreditation round, the last one in 2009, and two bigger seminars for students (2010 and 2011). New students have also been trained recently, and all employers were trained when selected. There are also briefings for site visit panels. Aside from receiving the guidelines, international experts clarify any possible issues via Skype. CAQA has been unable to organise 'refresher' training for academic experts due to a lack of time and human resources. Seminars for academic experts are planned when documents are prepared for the recently revised standards (autumn 2017). (SAR; Meetings with the CAQA member responsible for IQA, experts, international experts, students and employers)

Reports from academic experts vary in quality, from accurate, focused and well-substantiated to those which do not provide clear, consistent and sufficient information to CAQA (SAR). As mentioned under ESG 2.3, scores given by some experts vary greatly or high scores are not substantiated by evidence (e.g. roughly 1 in 10 cases in social sciences). The experts involved in such cases are removed from the pool, and variations are rectified by CAQA when it drafts its reports; nevertheless, additional training is definitely needed, as the CAQA member for IQA told the panel. In September 2017, CAQA adopted the Rules on reviewers (provided to the panel) which lay down the procedures for the selection and appointment of academic experts (as outlined above) and state that CAQA provides training to experts at least every two years and organises annual meetings with them to improve collaboration.

As mentioned under ESG 2.3, the guidelines are detailed and entirely clear to the experts interviewed; thus, as most of them stated, they would not need any additional or regular training. However, feedback from CAQA on their reports would be appreciated, though they can always read CAQA's final reports on its website to see what inputs from their reports have been included. Both students and employer representatives are fully satisfied with the guidance provided by CAQA.

Analysis

This is another ESG where CAQA's compliance is limited by the 'systemic issue' highlighted under ESG 2.2 and 2.3. The 2.4 ESG standard and guidelines refer to EQA as carried out by groups of external experts, and to the wide range of expertise provided by peer experts who contribute to the work of the agency as being at the core of EQA. As the panel noted under the previous ESG, CAQA members have largely taken over the role of academic experts and are at the core of all EQA processes; the contribution of external academic experts is limited, with their job finished when they submit their reports based on the analysis of documentation. This limited role of experts external to CAQA is clearly

not in line with the idea of peer review as highlighted by the ESG. While experts are satisfied with this arrangement, in the panel's view, it does not allow CAQA to make best possible use of the expertise available among over 700 hundred experts. The panel examined a few CAQA's final reports, which does not demonstrate explicitly to what extent experts' perspectives are reflected in the reports. As it understands from its interview with experts, this is not regularly 'checked' by them.

The panel agrees with students that they both can meaningfully and should contribute to a wider range of aspects analysed during accreditation reviews and audits than is the case now. As student participation in EQA on an equal footing with other panel members is considered a good practice in the EHEA, it is reassuring that CAQA has promised to address this. Involving labour market representatives in CAQA's processes since 2013, in line with the 2012 recommendation, is indeed a significant step forward, even though, as the panel understands from CAQA's regulations, their participation in audits is optional (rather than compulsory as in the case of institutional accreditation). The panel believes that participation of students and employers, both being key stakeholders, would also be essential in periodic programme accreditation reviews where these are not combined with institutional ones (see the related comments under ESG 2.3). Where involved, employer representatives seem to have enough space to address the issues relevant to them during a site visit.

Involvement of international experts is currently very limited (but, judging from oral evidence, this is addressed by the new LoHE). More extensive involvement would be desirable, in the panel's view, not only in PhD programme reviews, as suggested by representatives of HEIs and international experts, but also in audits where their external perspective could help CAQA focus more on quality enhancement (see the related comments under ESG 2.1). As mentioned under ESG 2.2, their involvement would also help address the 'systemic issue' as anonymity would not be a concern. While CAQA is now caught in a 'resource trap' (see ESG 3.5), it would need to find a way to use its more than adequate financial resources to draw more on international expertise.

In the panel's view, the details to be provided in the application form for academic experts and the procedure for their selection, with the relevant sub-commission pre-screening applications, enables CAQA to identify candidates who have the required knowledge and skills in a given area; the Rules on reviewers recently adopted to formalise the procedure are a positive development. There is also evidence that experts whose performance is not satisfactory are not reappointed. There are no predefined formal criteria for students and employers, but it was evident to the representatives of SCONUS and SCOHS and the Chamber Commerce that the selection should be based on expertise. Both students and employers that the panel met appeared to be fully competent to do their job. The panel also notes that both expertise and the no-conflict-of-interest principle guide the appointment of experts and students for individual processes, and confirms that experts, students and employer representatives are aware of the contents of the Code of Ethics (see also ESG 3.3).

Considering CAQA's limited human resources, the effort it has made to provide adequate training to all newly recruited academic experts, students and employers is worth noting, and the detailed guidelines for academic experts are indeed helpful. The fact that half of the experts that the panel met were former CAQA members may, at least partly, explain why the group did not see any urgent need for additional training. Given the other evidence provided above, the panel agrees, however, with the CAQA member responsible for IQA that both additional and regular training would be necessary, as would be CAQA's feedback on experts' reports. Thus, it is glad to note that this is addressed by the newly adopted Rules on reviewers. As signalled under ESG 2.3, additional guidelines on scoring for experts and guidelines for students would be useful. As noted under ESG 2.1, the panel also believes that CAQA members, experts and students might benefit from a joint brainstorming session on how to approach SCL in EQA processes.

Panel recommendations

The panel recommends that CAQA (1) ensure the involvement of external experts as playing a central role in EQA processes, in line with the ESG; (2) ensure the involvement of students and labour market representatives in all periodic programme accreditation reviews; (3) provide space for students to contribute to its EQA processes beyond a range of aspects considered to be strictly student matters; (4) ensure much wider involvement of international experts, not only in periodic programme accreditation reviews but also in audits; (5) provide regular training, and feedback on reports, to academic experts. See also the related recommendation about CAQA's role in EQA processes under ESG 2.2. and guidelines for experts under ESG 2.3.

Panel conclusion: Partially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

2012 review recommendations: *(1) [The] panel would recommend a revision of the whole decision-making procedure. Even though [...] in the end the decisions are clear and consistent, the Panel would recommend a stronger division of labour between the external reviewers and CAQA members and CAQA itself. Especially the double role and the double involvement of CAQA members [...] in both the external quality assurance and in the final decision-making process calls for a clear separation of the two tasks. (2) Concerning the decision-making process, [...] the panel would recommend [...] a more structured feedback between the external reviewers and the CAQA members.*

The recommendations are included under 2005 ESG 2.3 (Criteria for decisions) in the 2012 report. They are all addressed under ESG 3.1, 2.2, 2.3 and / or 2.4 in this report as the panel believes that they fit better under these 2015 ESG.

Evidence

All of CAQA's processes end with a formal outcome, and accreditation outcomes are binding on the MoESTD. Initial accreditation reviews lead to a positive or negative opinion which provides the basis for the MoESTD to issue or refuse an operating licence to a new HEI and its programmes or (refuse to) include a new programme in the licence of an existing HEI. Upon completion of a periodic accreditation review, CAQA may grant accreditation and issue an accreditation certificate, or issue an 'act of warning' (regarded as an intermediate or temporary outcome), or refuse accreditation. In the case of refusal, the MoESTD revokes an HEI's licence or amends it to exclude the non-accredited programme (see also the QA system). An audit ends with CAQA adopting a report which confirms that an HEI fulfils its QA obligations or initiating a follow-up process (this is also considered an intermediate or temporary outcome). (LoHE; CAQA's Rules of Procedure and regulations on its processes listed in Annex 4 to this report; SAR; Meetings with CAQA members) (For procedures, see ESG 2.3)

Decision-making arrangements, defined in CAQA's Rules of Procedure, are the same for all of its processes. Decisions are proposed by the CAQA sub-commission whose members are directly involved in a given review / audit. CAQA takes decisions in its meetings by a simple majority vote, with at least

two-thirds of the membership required to attend; a member from an HEI undergoing the review / audit concerned is not present.

CAQA takes decisions based on compliance with the standards defined for its EQA processes, as assessed in its final reports where CAQA integrates findings from its own analysis of documentation, academic experts' reports and site visit reports (SAR; Pre-visit clarifications). The panel has examined six periodic institutional and programme accreditation review reports and two audit reports. As CAQA members explained to the panel during the site visit, the key standards for accreditation are those covering curriculum, staff, space and facilities. An 'act of warning' is issued where shortcomings can be eliminated in a short time (one week to six months, according to the procedure) (e.g. one course to be replaced; mission and vision not clear), and otherwise (e.g. significant gaps in curricula, inadequate qualifications of staff) accreditation is refused. No minimum criteria or benchmarks are defined for follow-up in audits, but there are detailed reports with as many recommendations as possible, and follow-up is initiated if a significant shortcoming is identified under any standard.

In 2017, 50% of HEIs consider that CAQA is 'very' consistent in applying its standards and 28% that it is 'reasonably' consistent, as compared to 67% and 21%, respectively, in 2015. The corresponding figures are 62% and 24% for students (2015) and 49% and 29% for academic experts (2017). (Survey findings published on the CAQA website). The representatives of evaluated HEIs that the panel met consider that decisions are taken consistently.

Analysis

The panel confirms that CAQA's decisions are based on the standards for its EQA processes which are pre-defined, clear and published on its website. It has found evidence, also in its discussions in the context of ESG 2.3, that CAQA members, acting as key experts, apply the standards consistently in processes. Some of the evidence provided under ESG 2.3 and 2.4 indicates that the approach of external experts is not always consistent. However, this does not affect final outcomes of processes as the issues identified in experts' reports are addressed by CAQA members drafting final reports which provide the basis for decisions. Judging from the sample examined by the panel, final reports provide ample evidence to justify decisions taken by CAQA. CAQA does not have any specific mechanism for ensuring consistency in final reports (except for a predefined structure for reports; see ESG 2.6). This is understandable as they are prepared by its members directly involved in processes and any possible inconsistencies can still be spotted at the stage when all CAQA members consider a decision to be taken (see below); (such a mechanism would be necessary, however, if the current arrangements were changed for the new Accreditation Body to be established and final reports were written by external experts). The reports examined by the panel are consistent in terms of both addressing all the standards for a given process and the approach to assessing compliance with the standards.

The criteria or benchmarks that CAQA uses when taking its decisions (an 'act of warning' or refusal of accreditation, and approval or follow-up in audits) are, likewise, clear and consistently reflected in the sample of final reports examined by the panel. This is further aided by collective decision-making in CAQA. Though this is not a major issue, it would be advisable to state these benchmarks more explicitly in CAQA's internal regulations, even if those for accreditation can be inferred from the procedure following an 'act of warning'. The rigorous approach for audits adopted by CAQA (a follow-up initiated in the case of a significant issue under any standard) is not entirely clearly explained in the regulation on audits; it refers only in general terms to a self-evaluation not being conducted in accordance with the standards and findings indicating low level of quality. Audits do not and will not lead to any legal consequences; however, explicitly defined benchmarks for follow-up would increase transparency in

decision-making (even if such a decision is not ‘final’ but part of an ongoing process) and may be more important when audits are carried out more often in accordance with the newly enacted LoHE.

Panel recommendations

The panel recommends that CAQA define more explicitly in its internal regulations the benchmarks for its decisions (an ‘act of warning’ as opposed to refusal of accreditation, and approval as opposed to follow-up in audits) which are consistently used in practice.

Panel conclusion: Substantially compliant

ESG 2.6 REPORTING

Standard:

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

2012 review recommendations: *[A] policy of open publication of the full reports should be continued. This would avoid or at least counter the possibility of a distorted perception by the general public, and (sometimes) even media attacks on CAQA’s decisions and overall work that has happened in the past.*

Evidence

Three types of reports are produced as part of CAQA’s processes: (1) individual academic experts’ reports (referred to as preliminary reports) based on the analysis of documentation from HEIs (all processes); (2) site visit reports (where a visit is undertaken) drafted by CAQA members involved, with comments on drafts from students and employer representatives integrated; and (3) what may be called overall / final reports, drafted by the CAQA sub-commissions concerned, which incorporate findings from the other ones, including experts’ views on compliance with the standards, and provide the basis for CAQA’s decisions / opinions (all processes). Only CAQA’s overall / final reports are intended for, and made available to, stakeholders. (SAR; Meetings with CAQA members)

Experts are occasionally asked to clarify some issues orally but never change their reports (Meetings with CAQA members and experts). As explained by experts, there is no need to change reports as it is CAQA who takes decisions. Where there is a difference of opinion between experts in their preliminary reports, CAQA members verify this during a site visit and rely on their findings (Meeting with the CAQA member for IQA). One of the experts interviewed suggested that it might be a good idea to have a joint preliminary report from experts involved in a given review / audit.

While there are guidelines and templates for academic experts’ reports and site visit report templates for each relevant process (see the list in Annex 4), CAQA does not have a template / form for its overall / final reports. There is, however, a pre-defined structure for reports: standard legal paragraphs at the beginning and end, quantitative data and comments on compliance with each standard for accreditation reports; and background information, comments on compliance with each standard and concluding remarks for an audit report. (Pre-visit clarifications) The main body of reports follows the accreditation or HEI self-evaluation / audit standards (SAR). Drafts of CAQA’s final reports are never sent to HEIs for a factual accuracy check before the final version is approved at a CAQA meeting (Meeting with CAQA members; Final clarification meeting).

Pursuant to LoHE, CAQA's accreditation opinions (reports) on new HEIs and their programmes should be submitted to the MoESTD as the basis for it to (refuse to) issue an operating licence (see ESG 2.5), and outcomes of audits should be published. CAQA's Rules of Procedure do not address explicitly the publication of reports; the Standards of CAQA Work refer to the publication of outcomes of both accreditation and audit processes; the regulation on audits states that reports should be published; there are no similar provisions in the regulations on accreditation processes. CAQA does not publish its accreditation opinions (reports) on new HEIs and their programmes. Reports on new accredited programmes at existing HEIs (which are subject to the periodic accreditation procedure), final periodic accreditation reports and audit reports are published on its Serbian-language website. (SAR; CAQA website) Accreditation reports with an 'act of warning' and those initiating a follow-up as part of an audit are only sent to HEIs and are not published (except examples in English) as they are considered part of an ongoing process; the final report is published upon completion of the process. (SAR; Meeting with CAQA members; Final Clarification Meeting) Examples of reports for each process, with each of the possible outcomes (including an 'act of warning' and an audit 'follow-up'), are available on the CAQA English-language website. A 'Guide through accredited institutions of higher education and study programmes in Serbia', intended for students and available on the CAQA website, provides an overview of all accredited HEIs and programmes, with accreditation dates.

The representatives of evaluated HEIs that the panel met find reports to be very useful as they clearly identify shortcomings and show what should be done to comply with the standards. As the panel learned from SCONUS and SCOHS leaders, the Guide is a valuable source of information for prospective students.

The panel has examined six periodic institutional and programme accreditation review reports and two audit reports.

Analysis

The 'systemic issue' discussed under the previous ESG has obvious implications for how CAQA addresses ESG 2.6. While it is expected in the ESG that a final report is written by a group of external experts, including a student and a labour market representative, their contributions are not really visible, and their views not necessarily reflected (for example, where academic experts' opinions differ) in CAQA's final reports. Even with the LoHE constraint for academic experts to remain anonymous, this could be at least partly addressed by involving all groups of experts in the drafting of overall / final reports or agreeing drafts with them (though the panel notes that the current arrangements are perfectly acceptable to experts). The panel also supports the idea put forward during the visit to have a joint report from academic experts; this could improve the overall quality of reports and ensure greater consistency and, in more general terms, bring the procedures slightly closer to the spirit of the ESG based on the idea that experts work as a team, contributing their collective expertise.

The panel confirms that initial accreditation reports on newly accredited programmes at existing HEIs, final periodic accreditation, including those with a negative outcome, and audit reports are published on CAQA's website. Since 'act of warning' accreditation reports and 'follow-up' audit reports are part of an ongoing process, the panel agrees that there is no reason to publish them. It may be helpful, though, to publish information on common quality-related shortcomings identified in such reports (see the related comments and recommendation on thematic analyses under ESG 3.4). The arrangement where initial accreditation reports on new HEIs and their programmes are not published is to some extent justifiable as these are considered CAQA's 'opinions' for the MoESTD, and newly accredited HEIs and programmes undergo a periodic accreditation review after one year (see ESG 2.3); CAQA is also constrained by the LoHE provision that its opinions should (only) be sent to the MoESTD.

The panel believes, however, that if allowed by law, such opinions / reports should be available to the public at least in cases where a review ends with a positive outcome as they provide the basis for an operating licence and are a source of information for prospective student applicants. For full clarity and transparency, it would also be advisable to state explicitly the rules for the publication of reports in CAQA's internal regulations. Furthermore, though none of the representatives of evaluated HEIs referred to factual errors in CAQA's reports, sending draft reports to the HEI concerned for a factual accuracy check is considered a good practice under this ESG.

While CAQA does not have templates / forms for its final reports, the sample of reports examined by the panel follow the structure adopted. Accreditation reports contain information about the HEI or programme concerned and the procedure, evidence combined with conclusions on each standard, and a decision. There are no explicit recommendations, but it is entirely clear from the text what should be improved to comply with the standards. Reports are very short (3 to 5 pages) and do not include much analysis. Though reports are signed by the CAQA President, for the sake of transparency, they could also include the names of the individuals involved in a given review where a site visit has been undertaken. Audit reports (15 to 35 pages) include all the elements recommended under this ESG; the final section provides a useful summary of strengths and weaknesses and recommendations. Both accreditation and audit reports are written in a language which should be easily understandable to stakeholders and are entirely clear. While summary reports are not prepared, the panel notes that the Guide to accredited HEIs and programmes is appreciated by students.

Panel commendations

The panel commends CAQA for publishing the Guide to accredited HEIs and programmes as a useful source of information for prospective students.

Panel recommendations

The panel recommends that CAQA (1) devise a way for ensuring, even within the current legal constraints, a more substantial contribution from external experts, including academic experts, students and labour market representatives, to its final reports; (2) devise, in collaboration with the Ministry of Education, an arrangement for CAQA to publish its initial accreditation opinions / reports on newly accredited institutions and their programmes; (3) define more clearly the rules for the publication of reports in its internal regulations; and (4) consider providing drafts of its reports to HEIs for a factual accuracy check. For a related 'systemic' recommendation about the involvement of external experts, see ESG 2.2.

Panel conclusion: Partially compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

Evidence

The SAR discusses appeals against CAQA's accreditation decisions, referring to the 2005 LoHE which lays down basic arrangements and the NCHE's regulation which defines the appeals procedure. CAQA's internal regulations available to the panel do not address complaints. During the visit, CAQA

members and representatives of evaluated HEIs confirmed that there was no formal procedure for complaints. HEIs could complain to the CAQA President but they have never had a reason to do so.

LoHE states that in the case of refusal of accreditation, the HEI concerned (or its founder) may lodge an appeal to the NCHE (for details about the NCHE, see the QA system). The appeals procedure is laid down in the NCHE's Rulebook on deciding on the appeals on CAQA decisions, published on its website. Information about the NCHE as the accreditation appeals body is available on CAQA's website; basic arrangements for appeals are explained in its Rules and regulations of accreditation standards and procedures for HEIs and their study programmes, also published on the website; and a clause about the possibility to lodge an appeal is included in CAQA's final accreditation reports. Representatives of the evaluated HEIs confirmed that they were fully familiar with the appeals arrangements.

Pursuant to the NCHE's Rulebook, an appeal is lodged with CAQA; if it finds the appeal justified, it may change its original decision, with or without an additional review. Otherwise, an appeal is considered by the NCHE within 90 days. Rapporteurs appointed from among its members analyse documents, may request further clarifications and undertake a site visit, and submit a report to the NCHE together with a proposed decision. The NCHE takes a decision by a majority vote. It may (1) reject the appeal if the procedure was properly implemented by CAQA (or procedural faults had no impact on its decision) and its decision is justified and taken in compliance with the relevant regulations; (2) override CAQA's decision, in whole or in part, and instruct it to reconsider its decision and conduct another review if key evidence is incomplete or incorrect, or the relevant regulations were not taken into account, or the decision is unclear or not adequately substantiated; (3) override CAQA's decision and take its own decision based on the evidence collected if the evidence was incorrectly assessed or led to an erroneous conclusion, or the relevant regulations were incorrectly applied.

The representatives of evaluated HEIs that the panel met consider that the appeals arrangements are entirely clear and ensure transparency, and did not raise any issues related to appeals arrangements. The only issue mentioned is that when the NCHE does not arrive at an appeals decision on a programme early enough, it cannot be launched in the coming academic year.

The SAR states that most of the appeal decisions taken by the NCHE are in agreement with CAQA's; for example, 11 (4%) of CAQA's 256 accreditation decisions in 2016 were overruled by the NCHE. The proportion of CAQA's decisions overruled by the NCHE would be larger if calculated in relation to CAQA's refusal decisions taken (rather than both positive and negative as the former are not appealed against). As explained by the NCHE, HEIs' appeals concern mainly qualifications of teaching staff, facilities and the harmonisation of programmes with those offered by HEIs in the European Higher Education Area (EHEA).

CAQA is not satisfied with the appeals arrangements and suggested establishing a separate body within the new QA body to be set up or within the NCHE (SAR: CAQA's Analysis of the draft LoHE).

Analysis

ESG 2.7 makes a distinction between an appeal which is lodged when an HEI questions the formal outcome of a process and a complaint where an HEI states its dissatisfaction with the conduct of a process or those carrying it out. It is clear that CAQA does not have in place any procedure for complaints. This should be addressed, with cases in which a complaint may be filed clearly specified, even if HEIs do not see an urgent need for CAQA to do so.

The panel acknowledges that appeals can be filed only in case accreditation is refused, whereas there is no possibility to appeal against CAQA's 'act of warning' as an outcome of an accreditation review

and its decision to initiate a follow-up process as a result of an audit (for outcomes, see ESG 2.5). It does not, however, see an issue here as both are regarded by CAQA as an intermediate stage in a process which ultimately ends with (refusal of) accreditation or approval of the final audit report.

The panel confirms that information about the possibility to file an appeal is easily accessible to HEIs. The procedure is clear, as confirmed also by HEIs, and, in the panel's view, embraces the cases in which filing an appeal may be justified as recommended by ESG 2.7. Unlike HEIs, the panel considers that the appeals procedure itself is not fully transparent (though this is not CAQA's procedure). While the NCHE is the appeals body, CAQA may actually be involved at the preliminary stage as a 'decision-maker' as, pursuant to the procedure, it can still change its original decision if it finds the appeal justified. CAQA does not have a separate body within itself to consider appeals in a fully transparent way at this preliminary stage nor a formal, explicit and published procedure to do so (its Rules of Procedure, which lay down decision-making arrangements, do not address such 'appeals' cases). This concern seems to be partly addressed by an established practice where, as the panel understands from its discussions with the NCHE and HEIs, it is, in fact, only the NCHE that considers appeals.

Aside from this, the appeals arrangements are quite unusual as the NCHE is a completely separate institution, whereas agencies normally establish an appeals body within their own structures, and ESG 2.7 refers to agencies themselves that are expected to consider appeals and complaints. Assessing how professionally or consistently the NCHE handles appeals would extend far beyond the Terms of Reference for the panel. However, as the panel learned in its interviews, where CAQA refused accreditation, the NCHE would have rather issued an 'act of warning' if it had been the body taking a decision. It is, obviously, much more difficult to arrive at fully consistent approaches to decision-making in two separate bodies than within one. Thus, while the current arrangement is acceptable within the framework set by the 2005 LoHE, the panel believes that it would be much better to have a separate appeals body within CAQA now or the QA agency to be established by the new LoHE (though the panel notes that the new Law already provides for the involvement of the NCHE in appeals). See also the related 2012 recommendation under ESG 3.3.

Panel recommendations

The panel recommends that (1) CAQA put in place a procedure for HEIs to file a complaint as it is defined under ESG 2.7, and (2) a separate appeals body be established within CAQA (or, if possible, within the new quality assurance body to be set up by the newly enacted Law on Higher Education).

Panel conclusion: Partially compliant

ADDITIONAL OBSERVATIONS

NEWLY ENACTED LAW ON HIGHER EDUCATION

As explained in the Introduction, the new LoHE enacted by the National Assembly in Serbia in October 2017 will establish a National Accreditation Body incorporating CAQA within a year, thus changing the latter's operational framework, and introduce a different procedure for the appointment of its members. The final version of the new LoHE was not yet available in English at the time of the review. Detailed operational arrangements for the new body and CAQA are yet to be laid down in separate regulations. The changes may have impact on CAQA's compliance with the ESG.

NEW STANDARDS FOR CAQA'S EXTERNAL QUALITY ASSURANCE PROCESSES

As mentioned under ESG 2.1, the standards still in place at the time of the review were revised in 2016. The new version was approved by the NCHE in April 2017 and published in the Official Gazette in September 2017; the standards will be introduced for applications to be submitted by HEIs based on new templates (those submitted in November 2017 are still based on the 'old' standards and templates). The revised standards were not yet available in English at the time of the review. A brief update provided by CAQA before the site visit seems to suggest that the revisions will not have any significant impact on CAQA's compliance with ESG 2.1, but the panel is not in a position to make a reliable judgement.

In view of the changes in the legislation and CAQA's standards, the panel suggests that CAQA be requested by the ENQA Board to submit a follow-up report when the new QA body is fully established, CAQA's operational arrangements put in place and the new standards introduced in its processes.

CONCLUSION

SUMMARY OF COMMENDATIONS

The panel commends CAQA for:

ESG 3.1: continued commitment to its mission and doing its job in a way which is genuinely appreciated by its stakeholders despite tough accreditation decisions it has made;

ESG 3.3: sustained and successful efforts to safeguard its independence within the constraints placed by the national legislation.

ESG 2.1: addressing very comprehensively student involvement in internal quality assurance as part of its standards for audits.

ESG 2.6: publishing the Guide to accredited HEIs and programmes as a useful source of information for prospective students.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel concludes that in the performance of its functions, CAQA is, overall, in substantial compliance with the ESG. The panel has found CAQA to be partially compliant with seven of the ESG. However, in four cases, all under ESG Part 2, this results mainly from one issue in the overall design of the EQA system in Serbia where CAQA acts as both the core group of peer-review experts conducting EQA processes, with only limited involvement of external experts, and the decision-making body in these processes. This 'systemic issue' emerges under ESG 2.2 but, unavoidably, has implications for compliance under ESG 2.3, 2.4 and 2.6, as explained at length in the previous sections; otherwise, the panel would have found CAQA substantially compliant with the latter three ESG. As another consequence of the 'systemic issue', CAQA is conceived more as a committee of experts than a fully-fledged QA agency, which has implications for how effectively it can perform its planning and management functions, as also demonstrated in the previous sections; this, in turn, has influenced, though to a lesser extent than under ESG Part 2, the panel's judgments under ESG 3.1, 3.5 and 3.6.

ESG 3.1: Partially compliant

Recommendations: CAQA should (1) revise its mission so that it clearly defines the range of its responsibilities, principles underlying its work and the nature of its interaction with stakeholders; (2) put in place mechanisms for effective forward planning and reviewing progress towards its objectives; and (3) take action, insofar as it is possible within its remit, to ensure that students and employers have their representatives in CAQA governance.

ESG 3.2: Fully compliant

ESG 3.3: Substantially compliant

Recommendations: CAQA should be provided with its own bank account to reduce its dependence on the Ministry of Education in administrative terms which has significant impact on CAQA's planning and management. For the recommendation on the appeals procedure, see ESG 2.7.

ESG 3.4: Substantially compliant

Recommendations: CAQA should produce regularly thematic analyses focusing on quality and internal quality assurance, in addition to those already available and planned which address quantitative aspects.

ESG 3.5: Substantially compliant

Recommendations: CAQA should enhance its resources planning and management to ensure that it makes best possible use of the resources available. See also the related recommendation about a bank account under ESG 3.3.

ESG 3.6: Partially compliant

Recommendations: CAQA should (1) devise an action plan for the development of its internal quality system; and (2) put in place formal mechanisms for gathering external feedback after each accreditation review and audit and internal feedback on a regular basis, and for following up on internal and external feedback collected.

ESG 3.7: Fully compliant

ESG 2.1: Substantially compliant

Recommendations: CAQA should (1) amend slightly its audit standards so that they embrace all aspects of ESG 1.1, 1.3, 1.4 and 1.7, and have a discussion with academic experts, students and employers participating in processes to arrive at a common understanding of how student-centred learning and recognition should be addressed; (2) refocus audits more towards the effectiveness of internal quality assurance; and (3) provide greater support for HEIs to take the primary responsibility for quality.

ESG 2.2: Partially compliant

Recommendations: CAQA should (1) devise, in cooperation with the national authorities, arrangements where its members do not combine the role of a body taking decisions with the role of key external experts, and where they focus on the former role in line with the spirit of the ESG; (2) place a stronger emphasis on quality improvement in its processes; and (3) amend its internal regulations to ensure full clarity and consistency. For a related recommendation about expert involvement, see ESG 2.4.

ESG 2.3: Partially compliant

Recommendations: CAQA should (1) revise its procedures to include a site visit as part of each periodic programme review; and (2) devise a way for HEIs to report on progress in the implementation of its recommendations as part of existing or new arrangements; (3) consider developing guidelines on scoring for academic experts to ensure greater consistency in their approach to assessment. See also the related recommendations about the involvement of CAQA members and experts under ESG 2.2. and 2.4.

ESG 2.4: Partially compliant

Recommendations: CAQA should (1) ensure the involvement of external experts as playing a central role in EQA processes, in line with the ESG; (2) ensure the involvement of students and labour market representatives in all periodic programme accreditation reviews; (3) provide space for students to contribute to its EQA processes beyond a range of aspects considered to be strictly student matters; (4) ensure much wider involvement of international experts, not only in periodic programme accreditation reviews but also in audits; (5) provide regular training, and feedback on reports, to academic experts. See also the related recommendation about CAQA's role in EQA processes under ESG 2.2. and guidelines for experts under ESG 2.3.

ESG 2.5: Substantially compliant

Recommendations: CAQA should define more explicitly in its internal regulations the benchmarks for its decisions (an ‘act of warning’ as opposed to refusal of accreditation, and approval as opposed to follow-up n audits) which are consistently used in practice.

ESG 2.6: Partially compliant

Recommendations: CAQA should (1) devise a way for ensuring, even within the current legal constraints, a more substantial contribution from external experts, including academic experts, students and labour market representatives, to its final reports; (2) devise, in collaboration with the Ministry of Education, an arrangement for CAQA to publish its initial accreditation opinions / reports on newly accredited institutions and their programmes; (3) define more clearly the rules for the publication of reports in its internal regulations; and (4) consider providing drafts of its reports to HEIs for a factual accuracy check. See also the related recommendation about involvement of external experts under ESG 2.2.

ESG 2.7: Partially compliant

Recommendations: (1) CAQA should put in place a procedure for HEIs to file a complaint as it is defined under ESG 2.7; and (2) a separate appeals body should be established within CAQA (or within a new quality assurance body to be set up by the newly enacted Law on Higher Education).

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel would like to make some suggestions which extend beyond the scope of the individual ESG and / or are related to the newly enacted LoHE, and which may be taken into account in reflection on further development of CAQA. Some of them have already been signalled in the previous sections.

Insofar as the panel may judge from the oral evidence collected, the new LoHE defines some elements of CAQA’s future operational framework, but other elements may still be open for discussion. Under ESG 2.2, 2.3, 2.4 and 2.6, the panel highlighted a major ‘systemic issue’ where CAQA members are both key experts conducting assessment and writing reports and the body taking decisions in EQA processes. This, together with all its implications, is largely predetermined by the 2005 LoHE and seems to be fully acceptable to the entire CAQA stakeholder community. However, by definition, it limits CAQA’s compliance with the ESG as they are based on a ‘model’ where external assessment is conducted by a group of experts who are external to both HEIs and the QA agency, and the agency takes decisions based on reports written by external experts. While the panel understands that sensitive issues such as expert anonymity are involved, it would encourage CAQA and all stakeholders to reflect jointly on how the current arrangements could be revamped along the lines of the ESG.

The panel also understands from the oral evidence that the National Accreditation Body to be set up by the new LoHE, and incorporate CAQA, will have a Steering Board and Director. This could be used as an opportunity to separate (strategic) planning and management functions from those strictly related to EQA, which CAQA members are now expected to combine and are overburdened with, transfer the former to the Board and allow CAQA members to focus on the latter, in particular, its role as a body taking decisions in EQA processes. As suggested under ESG 3.1, the new operational framework could also be used by CAQA to establish an advisory body bringing together national and international experts, as is the case in many QA agencies.

In their meeting with the panel, representatives of the MoESTD stated that, under the new LoHE, CAQA would have the same degree of independence in EQA processes as currently and the

Government would have no influence over CAQA. Various other stakeholders emphasised that CAQA had earned a reputation of an institution making unbiased judgements and being resistant to pressure, and expressed concerns about its future independence as the new LoHE had changed the arrangements for the appointment of CAQA members. As the panel is not in a position to make any judgement in this respect, it may only emphasise that, aside from being highlighted by one of the ESG, independence is, obviously, a great value in itself in EQA and a precondition for HEIs to accept decisions taken by a QA agency. In line with the ESG, CAQA's independence could be explicitly addressed in its founding documents.

As noted more than once in the previous sections, CAQA is highly valued by stakeholders for the admirable 'cleaning job' (to quote the students interviewed) it has done so far in higher education. As signalled under ESG 3.4, 2.1 and 2.2, the panel believes that, after roughly a decade of EQA in Serbia, its activities have laid the groundwork for both CAQA itself and HEIs to focus more on quality enhancement. It would also strongly encourage CAQA to use not only its EQA processes and training seminars for HEIs, but also its good working relations with CONUS and COHS, SCOUS and SCOHS and HEIs and various jointly organised meetings, to enhance awareness among HEIs of their primary responsibility for quality.

It seems that in its analysis of, or efforts to address, some of the ESG (for example, 2.1, 2.6 and 2.7), CAQA could have given more consideration to all of the aspects covered not only by a given standard but also by the related guidelines. The re-establishment of CAQA as part of the new QA body would provide a good opportunity to review thoroughly its (planned) activities and arrangements against the ESG.

Finally, under ESG 2.2, 2.5 and 2.6, the panel noted that CAQA's internal documents would need to be amended for full clarity, consistency or transparency, even if they are entirely clear to the national stakeholders. This, too, could be done when CAQA is re-established within the new QA body.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

15.10.2017				
15:30-16:15: A discussion on the HE and QA system with the CAQA Resource Person, Prof Mirosljub Milivojčević				
16:15-19:00: Preparatory meeting of the panel				
16.10.2017				
TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
08:30- 9:00	Arrival to the agency, tour of facilities			
09:00 - 9:30	Review panel private meeting			
09:30-10:15	Meeting with the CAQA Working Group responsible for the self-assessment report	1. Prof Sofija Pekić Quarrie, CAQA member, WG leader 2. Prof Mirko Savić, CAQA member, WG member 3. Prof Vesna Kuntić, CAQA member, WG member	Preparation for the external review	
10:15-10:30	Discussion among panel members			
10:30-11:30	Meeting with the CAQA Chairman and members, Part I: CAQA management	1. Prof Ćemal Dolićanin, CAQA president 2. Prof Biljana Predić, CAQA member 3. Prof Zoran Todović, CAQA member 4. Prof Zorana Jelić-Ivanović, CAQA member 5. Prof Šćepan Miljanić, CAQA member	Strategic goals and planning; communication policy (ESG 3.1); Status and independence (ESG 3.2 and 3.3); Research capacity and thematic analyses (ESG 3.4); Funding and human resources (ESG 3.5); Complaints and appeals (ESG 2.7)	
11:30-11:45	Discussion among panel members			
11:45-12:45	Meeting with the CAQA members, Part II: CAQA external quality assurance processes	1. Prof Dubravka Jovičić, CAQA member 2. Jovan Popović, CAQA member 3. Prof Mirosljub Milivojčević, CAQA member	External quality assurance processes and methodologies, criteria for decisions (ESG 2.1- 2.6)	
12:45-13:45	Lunch/Discussion among panel members			
13:45-14:45	Meeting with CAQA staff	1. Ana Marjanović, CAQA officer 2. Tanja Ristić, CAQA officer 3. Jelena Đukanović, CAQA officer 4. Marin Milojević, CAQA officer 5. Anja Tot, CAQA officer 6. Miloš Bokan, CAQA officer (finance)	Working conditions; development opportunities; independence; staff involvement in CAQA internal quality assurance and thematic analyses (ESG 3.3, 3.4, 3.5 and 3.6)	
14:45-15:00	Discussion among panel members			
15:00-16:00	Meeting with the National Council for Higher Education (NCHE)	1. Jelica Đokić, NCHE member 2. Prof Endre Pap, NCHE member 3. Prof Milan Aleksić, NCHE member	Selection of CAQA members and CAQA independence (ESG 3.3); Designing external quality assurance methodologies and implementing	

			processes (ESG 2.2 and 2.3); Criteria for decisions, and appeals (ESG 2.5 and 2.7); CAQA thematic analyses (ESG 3.4)	
16:00-16:15	Discussion among panel members			
16:15-17:15	Meeting with the Ministry of Education, Science and Technological Development (MoES)	1. Prof Vladimir Popović, Secretary of State Ministry of Education, Science and Technological Development 2. Mr Dragan Popović, Head of Sector for Development and Higher Education	Current national QA framework and changes planned in a new LoHE draft; CAQA independence (ESG 3.3) and funding (ESG 3.5); CAQA thematic analyses (ESG 3.4)	
17:15-17:45	Wrap-up meeting among panel members			
17.10.2017				
09:00-10:00	Meeting with experts involved in external quality assurance processes	1. Prof Vera Vujčić 2. Prof Ivan Milentijević 3. Prof Dušica Pavlović 4. Neda Bokan 5. Marina Topuzović 6. Jelica Protić	External quality assurance processes and methodologies; selection and training of experts; reporting; criteria for decisions (ESG 2.1-2.6); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)	
10:00-10:15	Discussion among panel members			
10:15-11:00	Meeting with students involved in external quality assurance processes	1. Šćepan Sinanović, college 2. Marko Radić, college 3. Ivana Vraneš, faculty 4. Nenad Drekalo, college 5. Anja Conev, faculty	External quality assurance processes and methodologies, incl. selection and training of students, role of students in CAQA processes, and student perspective (ESG 2); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)	
11:00-11:30	Skype meeting with international experts involved in external quality assurance processes	1. Paul Murray, prof of performing arts, University of Winchester, UK 2. Matthew Gorton, prof of agro-economics, University of Newcastle, UK	External quality assurance processes and methodologies; selection and training of experts (esp. ESG 2.3 & 2.4); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)	
11:30-11:45	Discussion among panel members			
11:45-12:30	Meeting with the CAQA member responsible for internal QA	1. Prof Mirko Savić, member of CAQA	Internal quality assurance policy, feedback collection and follow-up mechanisms (ESG 3.6)	
12:30-13:30	Lunch			
13:30-14:45	Meeting with HEIs: Universities and Higher Schools / Colleges	1. Prof Nada Kovačević, vice rector, Belgrade University 2. Prof Ivana Sekeruš, dean of the Faculty of Philosophy, University Novi Sad 3. Prof Vera Petrović, director of the College of electronics and computing Belgrade 4. Milorad Rančić, director of the College of technical professional studies Zrenjanin	External quality assurance processes and methodologies; experts; criteria for decisions; reporting; and appeals (ESG 2); CAQA independence and accountability, incl. external feedback collection (ESG 3.3 and 3.6)	

		5. Ljiljana Đorđević, director of the College of applied studies Vranje		
14:45-15:00	Discussion among panel members			
15:00-16:00	Meeting with representatives of the Conferences of Universities (CONUS) and Higher Schools (COHS)	1. Prof Vladimir Bumbaširević, president, rector of Belgrade University 2. Prof Ivanka Popović, vice rector of Belgrade University 3. Prof Svetlana Karić, vice president of COHS 4. Prof Miladin Kalinić, vice president of COHS	HEIs' perspective on CAQA governance and independence, incl. relations between CAQA, and NCHE and MoES (ESG 3.1 and 3.3); Involvement in designing CAQA methodologies (ESG 2.2); CAQA accountability (ESG 3.6); CAQA thematic analyses (ESG 3.4)	
16:00-16:15	Discussion among panel members			
16:15-17:00	Meeting with representatives of the Students Conferences of Universities (SCONUS) and Higher Schools (SCOHS)	1. Milutin Marković, vice-president of SCOHS 2. Nebojša Andrejević, president of SCOHS Assembly 3. Nenad Drekalović, SCOHS 4. Milan Videhović, SCONUS 5. Ilija Gavrilović, SCONUS	CAQA governance, and students' role in external quality assurance (ESG 3.1); Involvement in designing CAQA methodologies (ESG 2.2); Selection and training of students for CAQA processes (ESG 2.4); student perspective in CAQA processes (ESG 2); Independence of CAQA and students involved in its processes (ESG 3.3) and professional conduct (ESG 3.6).	
17:00-17:15	Discussion among panel members			
17:15-18:00	Meeting with the employers' organisation (Serbian Chamber of Commerce) and employer representatives involved in external quality assurance processes	1. Mirjana Kovačević, director of the Education division of Chamber of Commerce 2. Jelena Jakovljević, deputy director of the Education division of Chamber of Commerce 3. Lazar Turbatović, employer involved in QA process	CAQA governance, and employers' role in external quality assurance (ESG 3.1); selection and training of employers for CAQA processes (ESG 2.4); employability and related issues in CAQA processes (ESG 2); Independence of CAQA and employers involved in its processes (ESG 3.3) and professional conduct (ESG 3.6).	
As necessary	Wrap-up meeting among panel members			
18.10.2017				
09:00-9:45	Meeting among panel members to agree issues to be clarified			
09:45-10:30	Meeting with the CAQA Chairman and members (or the Self-Assessment Report Working Group) to clarify any pending issues	1. Prof Čemal Dolićanin, CAQA president 2. Prof Sofija Pekić Quarrie, CAQA member, WG leader 3. Prof Dubravka Jovičić, CAQA member 4. Prof Vesna Kuntić, CAQA member, WG member	Outstanding issues	

		5. Prof Miroljub Milivojčević, CAQA member, resource person		
10:30-13:00	Private meeting among panel members to agree on the main findings			
13:00-13:45	Lunch			
13:45-14.30	Final meeting with the CAQA Chairman and members to inform about preliminary findings	1. Prof Ćemal Dolićanin, CAQA president 2. Prof Biljana Predić, CAQA vice-president 3. Prof Sćepan Miljanić, secretary general of CAQA 4. Prof Miroljub Milivojčević, CAQA member 5. Prof Sofija Pekić Quarrie, CAQA member, WG leader 6. Prof Mirko Savić, CAQA member, WG member 7. Prof Vesna Kuntić, CAQA member, WG member 8. Prof Dubravka Jovičić, CAQA member 9. Prof Zoran Todović, CAQA member 10. Prof Zorana Jelić-Ivanović, CAQA member 11. Prof Vera Milošević, CAQA member CAQA officers	Preliminary findings of the review	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Commission for Accreditation and Quality Assurance (CAQA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

March 2017

1. Background and Context

The Commission for Accreditation and Quality Assurance (CAQA) is formed in 2006 by the Law on higher education as an independent body of the National Council for higher education. It is the only formally recognised body responsible for the external quality assurance for higher education in Serbia. CAQA has 17 members from different scientific/educational fields from both, academic and professional sector supported by 8 members of administrative staff. It is financed by the accreditation fees, and the Ministry for education provides technical and administrative support. CAQA has operational and decision-making independence from all stakeholders (Ministry, National Council, higher education institutions).

CAQA carries out the accreditation procedure for higher education institutions (HEIs) and study programmes (both periodical on 5 years), decides on the application for accreditation and issues a certificate of accreditation which is a prerequisite for licencing HEIs in Serbia. CAQA has a mandate to develop accreditation and quality assurance standards, and to run the processes of initial accreditation, periodic accreditation of study programmes and institutions as well as process of external quality control at the institutional level (auditing). In these processes CAQA uses pool of over 700 external experts. CAQA prepares the standards for all evaluation processes (accreditation at institutional and study programme level, auditing, initial accreditation, and self-evaluation of HEIs) together with accompanying procedures and guidelines. The first standards were developed in 2007 and in 2016 CAQA has prepared a revised version according to the changes in the ESG, minor changes in the Law on higher education as well as to the 10 years of experience in implementing the standards.

Since 2007, CAQA has completed 2 rounds of accreditations at both, institutional and study programme level: the first during 2007-2011 and the second during 2012-2016, as well as one round of the external quality control – auditing. In total over 200 HEIs and 1600 study programmes have been accredited in every accreditation round. Methodology used in these processes is also defined and strictly followed. For the accreditations, applications are first sent to the reviewers, then on-site visits to the institutions are organised with the participation of the CAQA members, students and labour market representative. Reports are prepared for adoption at the CAQA meeting. Accreditation decisions are: accreditation, if all the quality standards are met; act of warning, if the standards are partially met; and rejection, if the standards are not met. Reports on the decisions are then publicised. External quality control (auditing) is based on the self-evaluation reports that are peer reviewed and after the site visit expert team prepares the extensive report for the CAQA meeting. Positive report is publicised and in the case of the substantial problems in the quality, institution is submitted to the follow-up procedure. Using the method described above, CAQA has conducted since 2007 a total of **5234** (2233 in the period of 2007-2011, and 3001 in the period of 2012-2016) quality assessments, of which 465 (232 plus 233) were accreditation requests for HEIs; 4401 (1947 plus 2454) accreditation requests for study programmes and 126 (54 plus 72) requests for external quality control (audit) of HEIs. Since 2013 CAQA has received 19 requests for initial accreditation.

CAQA has also the role of advising HEIs on how to implement the standards of internal quality control, how to write the self-evaluation report and how to prepare for the external quality control. CAQA runs seminars for the new peer-reviewers. CAQA has developed international cooperation with the agencies within the region and at the European level. CAQA has also developed the system of internal quality control by analysing questionnaires given to all its stakeholders on the regular basis (every 2-3 years). Since the last evaluation by ENQA, CAQA has published 3 system wide analysis and several reviews in which many aspects of its activities have been analysed. Majority of them are comparative analysis of the accreditation outcomes for 2 accreditation cycles in the different sectors. That enable the information on the effects of the process of external quality control on development of internal quality control mechanisms within the HEIs as well as on overall improvement of HEIs.

CAQA has been a member of ENQA since April 2013 and is applying for renewal of ENQA membership.

CAQA has been registered on EQAR since November 2014 and is applying for renewal.

2. Purpose and Scope of the Evaluation

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

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

2.1 Activities of CAQA within the scope of the ESG

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

CAQA is conducting 2 types of external evaluations: accreditation (at institutional and programme level) and external quality control (audit) based on the self-evaluation of HEIs. There are also 2 types of accreditations: initial and periodic (on 5 years). CAQA has developed, and recently revised standards for all those groups of standards with accompanying guidelines.

The following activities of CAQA have to be addressed in the external review:

1. Accreditation of study programmes
2. Accreditation of HEIs
3. Initial accreditation
4. Audits

3. The Review Process

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

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by CAQA, including the preparation of a self-assessment report;

- A site visit by the review panel to CAQA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

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

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

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

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

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which CAQA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-

scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

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

The review panel will be assisted by CAQA in arriving in Belgrade, Serbia.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and CAQA.

3.4 Preparation and completion of the final evaluation report

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

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

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

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

4. Follow-up Process and Publication of the Report

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

Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

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

5. Use of the report

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

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

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

6. Budget

CAQA shall pay the following review related fees:

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

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

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

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

7. Indicative Schedule of the Review

Agreement on terms of reference	March/April 2017
Appointment of review panel members	March 2017
Self-assessment completed	By July 2017
Pre-screening of SER by ENQA coordinator	July 2017
Preparation of site visit schedule and indicative timetable	August 2017
Briefing of review panel members	September 2017
Review panel site visit	October 2017
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	By December 2017
Draft of evaluation report to CAQA	January 2018
Statement of CAQA to review panel if necessary	January 2018
Submission of final report to ENQA	February 2018
Consideration of the report by ENQA Board	March/April 2018 (depending on the date of ENQA Board meeting)
Publication of report	March/April 2018

ANNEX 3: GLOSSARY

CAQA	Commission for Accreditation and Quality Assurance
COHS	Conference of Higher Schools (colleges)
CONUS	Conference of Universities
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
EQAR	European Quality Assurance Register
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
ECTS	European Credit Transfer and Accumulation System
HEI	higher education institution
IQA	internal quality assurance
LoHE	Law on Higher Education
MoESTD	Ministry of Education, Science and Technological Development
NCHE	National Council for Higher Education
QA	quality assurance
SAR	Self-assessment report
SCL	Student-centred learning
SCOHS	Student Conference of Higher Schools (colleges)
SCONUS	Student Conference of Universities

ANNEX 4: DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY CAQA

Self-assessment report

Written clarifications provided by CAQA at the panel's request ('Addendum' to the SAR)

Hyperlinks and annexes to the self-assessment report:

NATIONAL DOCUMENTS

Law on Higher Education

CAQA REGULATIONS AND INTERNAL DOCUMENTS

General

2013-2017 Strategy

Annual Report on the work of the Commission for Accreditation and Quality Assurance for the period 13.05.2016-21.04.2017

Budget overview 2012-2016

Rules of Procedure of CAQA

Policy of Quality

Standards of CAQA work

Code of Ethics

2017 Decision on improving, intensifying and operationalisation work with reviewers

Survey on CAQA's work 2011 and 2014

Survey on CAQA's work 2017

EQA methodologies

Rules and regulations on standards for the initial accreditation of HEIs and study programmes

Rules and regulations of accreditation standards and procedures for accreditation of HEIs and their study programmes (with amendments)

Rules on amendments and additions to the bylaw on standards and the procedure for accreditation of study programmes of the first and second level

Rules on amendments and additions to the bylaw on standards and the procedure for accreditation of doctoral programmes

Rules and regulations on standard procedure of external quality control (with a follow-up procedure) (*addressing audits*)

Rules and regulations about self-evaluation and assessment of quality of HEIs (with standards for self-evaluation) (*also providing the basis for audits*)

Guidelines for preparing documentation for accreditation of study programmes of the first and second level including accompanying tables and attachments (for HEIs)

Guidelines for preparing documentation for accreditation of study programmes of doctoral studies including accompanying tables and attachments (for HEIs)

Guidelines for preparing documentation for accreditation of interdisciplinary and transdisciplinary, distance learning and joint programmes (for HEIs)

Guidelines for preparing documentation for accreditation of HEIs including accompanying tables and attachments (for HEIs)

Guidelines for preparing documentation for initial accreditation (for HEIs)

Guidelines for preparing a self-evaluation report (for HEIs)

Guidelines for preparing additional documentation for external quality control of HEIs including accompanying tables and attachments (for HEIs)

Instructions for reviewers for initial accreditation of HEIs

Instructions for reviewers for accreditation of HEIs

Instructions for reviewers for accreditation of study programmes

Instructions for reviewers for accreditation of doctoral study programmes

Instructions for reviewers for audit

Protocol for the site visit for initial accreditation

Protocol for the site visit for institutional accreditation

Questions for interviews during the site visit

Template for the reviewer's application (candidates applying to be reviewers)

Template for the request for accreditation

Template for the request for external quality control

Template for the request for initial accreditation

Template for the reviewer's report for accreditation of study programmes of the first and second level

Template for the reviewer's report for accreditation of doctoral study programmes

Template for the reviewer's report for accreditation of HEIs

Template for the reviewer's report for external quality control of HEIs

Template for the reviewer's report for initial accreditation of HEIs

Template for the site visit report for initial accreditation

Template for the site visit report for institutional accreditation

List of reviewers

Examples of final reports for each process

OTHER SOURCES USED BY THE REVIEW PANEL

National documents

Strategy for Education Development in Serbia 2020

Strategy on Science and Technological Development 2016-2020

Documents related to QA methodologies

Rulebook on deciding on the appeals on CAQA decisions

Documents provided by ENQA

2012 External Review Report

2013 ENQA decision on CAQA membership

CAQA Progress Reports for ENQA

2014 QAR decision on CAQA registration



THIS REPORT presents findings of the ENQA Agency Review of the Commission for Accreditation and Quality Assurance (CAQA), undertaken in 2017.



2018 ENQA AGENCY REVIEW