

ENQA AGENCY REVIEW

INDEPENDENT KAZAKHSTAN CENTER OF ACCREDITATION (IKCA)

HELI MATTISEN, MARIE GOULD,
PAOLO CHERUBINI, STANIMIR BOYADZHIEV
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EXECUTIVE SUMMARY

This report summarises the findings and conclusions of the external review panel for the evaluation of compliance of the 'Independent Kazakhstan Center of Accreditation' (IKCA) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The review was coordinated by the European Association for Quality Assurance in Higher Education (ENQA) and the agency was reviewed following the methodology and guidelines prescribed by ENQA. The review was conducted over the period May 2022 to June 2023.

IKCA is a non-governmental and non-profit organisation established in 2016 and has been active in higher education since 2018. The agency's mission is two-fold, it includes the evaluation of institutions and programmes against predetermined standards and criteria, and the promotion of a quality culture in educational institutions in Kazakhstan. During the period 2019-2022 the agency has worked mainly in the field of technical and vocational education and with organisations of additional education. Since 2021, the agency has been focusing on accreditation in higher education, and in 2022, of 75 programmes accredited by IKCA, 64% were higher education or university programmes. ENQA membership and EQAR registration are strategically important and critical milestones for the agency's recognition and development in higher education in Kazakhstan.

Based on the range of documentation considered and the diverse range of stakeholders the review panel met with during the site visit, the review panel acknowledges the significant development in the agency's competence in higher education in a relatively short period of time. It is clear to the review panel that IKCA is a well-regarded and respected agency with its strategic partners and the institutions, and the review panel acknowledges and commends the commitment and professionalism of the agency's staff, who are held in high regard by external stakeholders.

The agency recognises the strategic importance of partnership and collaboration and has established key partnerships with external stakeholders, including the Ministry, representative bodies, industry, and the institutions. The review panel heard from higher education institutions that the agency is a key support for them in developing the system for internal quality assurance and in using accreditation as a tool for improvement. The mission of the agency is shared by the institutions. Similarly, the labour market representatives recognise the importance of the agency and the impact on the higher education system in Kazakhstan. The review panel met with the agency's experts, including many young and motivated students, all were aware of what their role was as experts and felt well supported by the agency.

The review panel wishes to acknowledge the strategic importance of the agency's initiatives and efforts to engage internationally and learn from other QA agencies. The IKCA has agreed MOUs with some established QA agencies to learn from. The review panel notes the importance of such collaborations for new agencies and considers cooperation on enhancement initiatives with other agencies in Kazakhstan would also be a positive initiative.

Nonetheless though the agency is developing strong partnerships and has excellent working relations with the institutions, the review panel would like to see more opportunities for engagement and feedback from stakeholders, and a more self-critical and self-reflective approach in the agency for continuous improvement, which was not evident in the SAR. Stakeholders are represented in the agency's governance structures, but the panel considers there is significant scope to increase their autonomy within these structures, namely, the Supervisory Board and Accreditation Council; and to enhance their involvement in the design, development, and decision-making processes, through for example more effective engagement with the Expert Councils.

The review panel notes the commitment of staff but considers that the agency will need to invest more time and resources into the development of staff members. The review panel considers it is very

important for IKCA to develop a systematic approach towards staff development. English language is one of the suggested competencies, identified by the agency's director, and it is clear to the panel that if the agency wants to be part of the international community of quality assurance, this will be extremely challenging without staff competency in the English language.

Regarding the agency's accreditation standards and compliance with the ESG, the agency is methodical in its approach and the Kazakh national context is reflected, which the panel considers important for the higher education institutions. But when reviewing the accreditation reports, the review panel notes however that some important topics from the ESG part I are not integrated in the reports. A focus on student-centred learning, student assessment, and information management was not evident to the review panel from its consideration of accreditation reports. The agency will need to consider how to develop the capacity of its 'experts' to enable them to have a full understanding of the ESG part I. The panel considers it is very important that there is a consistent understanding and embedding of the standards.

The review panel has a fundamental concern with regards to the governance of the agency. The panel is happy with the commitment of the agency governance representatives and with the agency's governance structures, and it is clear to the panel that the structures are currently operating without any undue interference in the processes of developing the standards and making accreditation decisions. But fundamentally, in the agency's charter the founder organisation has a significant role and the ultimate decision-making authority, which could potentially undermine the independence of the agency's decisions.

Considering the documentary and oral evidence with regards to consistency and reliability of external quality assurance decisions (ESG 2.5), the review panel must conclude that there are deficiencies in the transparency and clarity of the criteria for decisions as well as their consistent application.

The panel also learned that the agency does not publish negative accreditation decisions, or decisions on withdrawal of accreditation, which is in clear contradiction to ESG standard 2.6. Although there is a database of accreditations on the agency's website, it is still not possible to find all accreditation reports along with the final outcomes.

The review panel finds IKCA compliant with the ESG standards:

- 3.1 (Activities, policy and processes for quality assurance)
- 3.2 (Official status)
- 3.5 (Resources)
- 3.7 (Cyclical external review of agencies)
- 2.4 (Peer review experts)
- 2.7 (Complaints and appeals)

The review panel finds IKCA partially compliant with the ESG standards:

- 3.3 (Independence)
- 3.4 (Thematic analysis)
- 3.6 (Internal quality assurance and professional conduct)
- 2.1 (Consideration of internal quality assurance)
- 2.2 (Designing Methodologies fit for purpose)
- 2.3 (Implementing processes)

The review panel finds IKCA is non-compliant with the ESG standards:

- 2.5 (Criteria for outcomes)
- 2.6 (Reporting)

The review panel believes that IKCA has made significant progress since its establishment and is considered a trusted agency by external stakeholders in the higher education system in Kazakhstan, with ambitious plans for future development. The panel hopes that its analysis and recommendations will contribute and support IKCA in this development and in realising its long-term strategic goals.

INTRODUCTION

This report analyses the compliance of Independent Kazakhstan Centre of Accreditation - IKCA (Независимый Казахстанский центр аккредитации - НКЦА) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted for the purposes of ENQA membership and registration in EQAR, in May 2022 to June 2023.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

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

As this is IKCA's first external review, the panel is expected to pay particular attention to the policies, procedures, and criteria in place, being aware that full evidence of concrete results in all areas may not be available at this stage.

SCOPE OF THE REVIEW

The initial terms of reference for this external review identified the following activities for inclusions within the scope of the review:

- institutional accreditation of higher education organisations, including post-accreditation monitoring;
- specialised (programmatic) accreditation of educational programs, including post-accreditation monitoring;
- accreditation of organisations of additional (further) education, including post-accreditation monitoring.

The terms of reference also stated that the review 'should further analyse how IKCA ensures a clear separation and prevents conflicts of interest between the above-mentioned external quality assurance activities and its tasks of *provision of methodological and advisory assistance to educational organisations on accreditation issues, as well as consulting services for auditing and assessing the quality of education*'.

The review panel considered it necessary to investigate more closely whether the accreditation of the organisations of additional education falls under the scope of the ESG. Additional education of adults is defined in the Kazakhstan Law (Article 37) as follows: '*Education of adults (persons who have reached the age of eighteen) is aimed at meeting their educational needs throughout their lives in order to obtain an additional amount of knowledge and skills in accordance with the ongoing socio-economic changes in society. Obtaining additional knowledge and skills by adults is carried out through additional and non-formal education.*' The Law says that the additional education can be provided by different types of organisations, both formal and non-formal education institutions. The Law also mentions that the additional education can be provided by the 'preparatory departments of higher education institutions', which is understood as preparatory courses provided to the candidates applying for degree programmes. The courses provided by accredited organisations of additional education can be later recognised by higher education institutions as part of degree programmes, if applicable. Thus, the law provides a legal basis for recognising previous learning experience acquired as additional education as part of higher education programmes. However, as confirmed by the sample of reports

on accreditation of educational institutions provided to the review panel (LLP "Republican Center professional development "BILIM" and LLP "Multiprofile Medical College "Avicenna") the IKCA regulation on accreditation of organisations of additional education does not address higher education institutions and the additional education programmes are not linked to the EQF levels 6-8. Therefore, the review panel is not addressing the organisations of additional education in this review report, they are not within the scope of the review.

Further, the review panel learned that IKCA had recently developed and published regulations on accreditation of medical institutions and medical programmes, which were not included in the original terms of reference for the review. The panel confirmed during the preliminary meeting and through additional evidence requested and provided by IKCA that the agency offers accreditation both of medical institutions and programmes, although no corresponding accreditation has been carried out so far. As this is in the area of higher education, accreditation of medical institutions and programmes is deemed within the scope of the review.

During the review, it was also confirmed to the review panel that in June 2022 the IKCA charter had been amended and the reference to the 'provision of methodological and advisory assistance and consulting services on review and evaluation of quality to institutions', had been removed. This is no longer a stated function or activity of the agency. The review panel is happy that this addresses the previous concern regarding a potential conflict between external quality assurance activities and advisory/consultancy activities of the agency.

The institutional and program accreditation of technical and vocational education organisations is outside of the scope of the ESG and not relevant for the application for inclusion on EQAR.

The scope of the terms of reference for this review was subsequently amended to include:

- Institutional accreditation of higher education organisations, including post-accreditation monitoring;
- Specialised (programmatic) accreditation of educational programs, including post-accreditation monitoring;
- Accreditation of organisations of medical institutions, including post-accreditation monitoring;
- Accreditation of medical programmes.

REVIEW PROCESS

The 2022 external review of IKCA 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 review panel for the external review of IKCA was appointed by ENQA and composed of the following members:

- Heli Mattisen, Director, HAKA, Estonia, Chair, QA professional (ENQA nominee)
- Marie Gould, Head of Tertiary Education Monitoring and Review, QQI, Ireland, Secretary, QA professional (ENQA nominee)
- Paolo Cherubini, Full Professor, University of Pavia (formerly, when appointed in the panel, university of Milano-Bicocca), Italy, panel member, academic (EUA nominee)
- Stanimir Boyadzhiev, PhD Student in Theory of the State and Law, University of Ruse, Bulgaria, panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool)

Goran Dakovic, Head of Agency Reviews of ENQA, acted as review coordinator for ENQA.

The review panel would like to express sincere thanks to Goran Dakovic for his expert coordination and support for the panel both in advance and during the review visit, this enabled the process to run smoothly for both the agency and the review panel.

The Self-Assessment Report of IKCA, and a number of annexes were shared with the review panel on 25 July 2022. The panel met twice online to discuss the SAR and annex material, and following these meetings some additional documents were requested. Additional documents were received by the panel on 3 October 2022, and following a second additional request, on 14 October 2022. A preliminary meeting was held online with the agency on 26 October 2022 to provide clarification on context and scope for the review. The IKCA Expert on International Projects, acted as the review coordinator in advance of the site visit, and provided translation at the preliminary meeting.

In conducting the review, the primary sources of evidence used by the review panel were the SAR, the interviews conducted with stakeholders during the site visit, published documentation on IKCA website and significant supplementary information and documents received both in advance and during the review visit.

Self-assessment report

Evidence

A self-assessment report (SAR), largely following the template provided by ENQA, was drafted by the team chaired by the IKCA Director of the Methodology, Monitoring and Quality Assurance Department, and involving the Director of the Accreditation Department, staff from the International Projects Department, members of the Supervisory and Accreditation Boards and the Chief Accountant. A plan for developing the SAR was put in place, including deadlines for implementation and responsibility for individual tasks. The panel heard that self-assessment reports of other agencies were reviewed to identify good practice. Each department within IKCA was tasked with mapping their activities to the ESG and providing material and content for the SAR.

The SAR includes information on the higher education system, implementation of the Bologna process and quality assurance of higher education in Kazakhstan, and a mapping of IKCA activities with ESG Parts 2 and 3, with additional material provided in several annex documents. The report was reviewed internally by the senior management team, the Accreditation Council, and the Supervisory Board, before being translated into English and submitted to ENQA.

Analysis

The review panel found the SAR to be informative, the overview of the higher education system and implementation of the Bologna process in Kazakhstan assisted the panel in understanding the context for the establishment and activities of IKCA. The panel considers that while the SAR was informative, the report lacked self-reflection and analysis in the main. The mission and tasks of IKCA were identified, but it was not clear to the panel as to how the mission and objectives translated and were implemented in the work and activities of the agency.

Even though a mapping and analysis was included for ESG Parts 2 and 3, this lacked detail and it was difficult for the review panel to locate specific evidence. As documents referenced within the SAR were not hyper-linked, the panel often found it difficult to find material on the website. The panel found that many documents on the website were difficult to read, and some were of poor quality, with typing errors and corrections and track changes visible.

The review panel found some inconsistency in terminology within the SAR and acknowledges that while this may be due to challenges in translating technical terminology, it caused confusion for the panel in trying to understand the structures and processes of IKCA. The process of development of the SAR did not involve the external stakeholders of the agency, for example, in meeting with the representatives of the Expert Councils, it was evident they had no knowledge of or involvement in the SAR process. The panel would encourage IKCA in future self-assessment processes to establish mechanisms for systematic feedback from stakeholders in the process.

Following a review of the SAR, and the gaps in evidence, it was necessary for the review panel to request significant additional material and documents from the agency, to provide clarity on some topics in advance of the site visit. The review panel acknowledges the cooperation of IKCA in addressing the additional information requests from the panel.

Site visit

The site visit was conducted at IKCA offices in Astana over two and half days from 2 to 4 November 2022. During the site visit IKCA Director of the Department of Methodology, Monitoring and Quality Assurance (DMMiOK), coordinated the review process, including providing additional information and documents for the panel and coordinating amendments to the meeting attendees.

The review panel would like to acknowledge and thank IKCA's Director, senior management team and staff for the welcome and hospitality received, the assistance with transport during the visit, and for the professionalism and constructive engagement during all meetings.

During the site visit consecutive interpreting was provided by an interpreter. The interpreter was independent of IKCA and agreed in advance with ENQA. The panel would like to express its gratitude to and commend the interpreter, given the intensity of the site visit, and the number of meetings, it was a significant task for one individual to undertake all the translations.

In the first meeting of the site visit, the review panel met with IKCA's founder and director, to discuss in particular the mission, strategic objectives, ownership and structure of the agency, and the national context of higher education in Kazakhstan.

Over the course of the site visit, the panel had 14 meetings with internal and external stakeholders, including, IKCA director, senior management team and QA staff, representatives of IKCA governance committees, external experts and student reviewers, representatives of institutions and employers, the ministry, and representatives of international QA agencies. The full programme of the site visit is available in Annex I.

The agency cooperated fully in facilitating the review panel meetings with all stakeholders as requested, and in addressing all additional documentation and information requests. All meetings were constructive and engaging with a positive atmosphere towards the review panel throughout the visit.

However, some meetings had a large number of participants and were hybrid in nature, with some participants online and some in person. The layout of the room was not suitable for engaging with large groups. It was therefore not always feasible for the panel to engage with all participants in every meeting, this was particularly the case in the meetings with the large number of students and institution representatives. This was explained by the review panel chair to all participants at the outset of the meetings.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Since joining the Bologna process in 2010, Kazakhstan's higher education system has gone through a series of reforms and developments, with greater harmonisation of the system with the European Higher Education Area (EHEA). Reforms over this time have included the establishment of an eight level National Qualifications Framework (in 2016) referenced to the European Qualifications Framework (EQF), a credit system compatible with European Credit Transfer and Accumulation System (ECTS) and a three-cycle degree structure of bachelor, masters, PhD, based on the principles of the Bologna Declaration. Programmes in all three cycles are required to include a professional practice element or work placement.

In 2018 the law 'On Education' was amended leading to significant organisational and structural changes for universities, with increased autonomy and independence for their academic curriculum and managerial responsibility for the institutions. As a result of these and other reforms over the past two decades the number of universities has decreased from 185 in 2001 to 128 in 2021 (SAR p.5). This transformation which is underway includes the transfer of universities to non-profit organisations, a process which has been completed for 68 of the 128 institutions, with 28 state universities working towards reorganisation of their structure and status to non-profit.

According to Kazakhstan's Committee on Statistics, the total number of students enrolled in the academic year 2019/2020 was 604,345, an increase of 11% on the previous year. Just over 70% of students are self-funded, with 27% receiving state scholarships. The percentage of students studying in Kazakh language is 64.9%, in Russian 29.6% and 5.5% of students in English. More than 80% of students are engaged in full-time programmes (SAR p.6).

An important strategy for higher education over the past decade is the **Academic Mobility Strategy in Kazakhstan 2012-2020** a key aim of which is to ensure the openness and transparency of higher education, cultivate international education and enhance student mobility both in and out of Kazakhstan. The 'Bolashak' international scholarship programme (in place since 1993) is one initiative which has been effective in supporting and enhancing student mobility. Over the past three years, between 2016 and 2019, the number of international students studying in Kazakhstan has tripled, going from just over 12,000 in 2016 to over 40,000 in 2019, the percentage of international students has now grown to 6.7% (SAR pp. 7-8).

In the academic year 2020/2021 the total number of university teaching staff was 36,307 with 36% holding master's degree and just over 8% being doctoral degree holders. The publication in English in international research publications is a new process for Kazakhstani university researchers. A number of initiatives undertaken at both national and institutional level, including teaching English, has led to a gradual increase in international publications.

In June 2022 the Ministry was split into two, with one Ministry for Education and a second new Ministry for Science and Higher Education. The Ministry for Science and Higher Education includes within its

structure a Committee for Quality Assurance. In its meeting with the ministry representative, the review panel heard of the strategic prioritisation of internationalisation in higher education, with plans for development of joint degrees and diplomas, in countries such as Hong Kong and Japan, and for establishing branches of foreign universities in Kazakhstan.

The ministry also confirmed a commitment to improving standards of education and lifelong learning opportunities for all citizens, including opportunities for achieving micro-credentials and credit for non-formal and informal education and experience. Work is also underway within the ministry in establishing and piloting curricula which is aimed at improving pedagogical education, with 70 universities working to enhance pedagogical education and practice.

QUALITY ASSURANCE

The law 'On Education' from 1999 stipulated the main requirements on accreditation for universities, with the commencement of state accreditation carried out by the Ministry in 2001. The accreditation process and methodology were further revised in 2004 and in 2007 when accreditation moved to being carried out on a voluntary basis. In 2011 the role of accreditation was significantly strengthened in revisions to the law 'On Education', which included a transition phase between 2014-2015, during which both national accreditation and state certification (in non-accredited institutions and programmes) were carried out in parallel. The State Programme of the Development of Education 2016-2019 led to a transition in institutional autonomy and structure (as outlined above), and a move from state certification to independent accreditation.

The law stipulates that accreditation must be carried out by non-profit, non-governmental organisations. The Ministry has established the regulations for recognition of accreditation agencies through the National Register of Accreditation Bodies. According to the law in Kazakhstan 'On Education' accreditation for higher education is voluntary and higher education institutions are free to choose a single or several different accreditation agencies.

To be included in the register of authorised agencies in the field of education and to receive state funding, an institution must have institutional and programme accreditation with a national and/or international accreditation agency included in the register of accreditation bodies. This implies that to receive state funding an institution must have external accreditation from a recognised accreditation agency. To date 104 universities have achieved national and international institutional accreditation, and specialised accreditation of 3,930 programmes has been carried out in 108 universities.

At the time of this review, there were six Kazakh and six international accreditation agencies included in the national register¹, these are:

- Kazakh agencies – IQAA, IAAR, ARQA, KAZSEE, EACAQA and HKIJA.
- ACQUIN (Germany), ASIIN (Germany), AQ Austria (Austria), ACBSP (United States), FIBAA (Germany) and MusiQuE (Belgium).

¹ See: <https://enic-kazakhstan.edu.kz/en/accreditation/organizacii-vysshego-i-ili-poslevuzovskogo-obrazovaniya-l>

INDEPENDENT KAZAKHSTAN CENTER OF ACCREDITATION (IKCA)

The Independent Kazakhstan Centre of Accreditation (IKCA) was established and registered in 2016 as a non-government, non-profit organisation. In 2018 IKCA was included in the Register of Recognised Accreditation Bodies (Register I) for a period of five years.

IKCA was founded by an organisation called Republican Scientific and Methodological Centre for the Development of Technical and Vocational Education and Qualifications (RSMC). The RSMC was a public organisation embedded in the Kazak Ministry of education up to 2016. After the reform of the Kazak law on education, RSMC was privatised, and became a for-profit Joint Stock Company with a single Owner. From its privatisation back in 2016, until today, the General Director of JSC RSMC also the current director of IKCA (since 2020). Amendments to the law in 2011 required that accreditation must be carried out by non-profit, non-government organisations, hence IKCA was established by the founding entity, in line with the requirements of the legislation, as a non-profit organisation. In 2018 IKCA was included as a competent quality assurance body in the Register of recognised accreditation bodies (Register I) of the ministry. According to IKCA the mission of the agency is 'to assist educational organisations in developing a culture of quality, competitiveness and attractiveness at national and international level' (IKCA Internal Regulations, p.3).

The main activities of the agency were initially concerned with accreditation in Technical Vocational Education (TVE) throughout Kazakhstan; the entity continues to provide accreditation in TVE. IKCA has since expanded into institutional and specialised (programme) accreditation in higher education. The main activities of IKCA as an external accreditation body include institutional accreditation and specialised (programme) accreditations of institutions of higher and postgraduate education, technical and vocational institutions, secondary schools, and organisations of additional education. The agency has recently developed new regulations for the accreditation of institutions of medical education and specialised accreditation of medical programmes.

Since its establishment, IKCA has been developing international partnerships. During the visit, the review panel met with representatives of European agencies and confirmed Memorandums of Agreement (MOA) are in place with IKCA to share good practice and experience in quality assurance in higher education. These include:

- Accreditation Organisation of The Netherlands Flanders (NVAO),
- ACBSP (Accreditation Council for Business Schools and Programs)
- Foundation for International Business Administration Accreditation (FIBAA) Germany, and
- The National Evaluation and Accreditation Agency (NEAA), Bulgaria.

According to the SAR, IKCA is a full member of INQAAHE (International Agency for Quality Assurance in Higher Education) and APQN (Asia-Pacific Network for Quality Assurance in Higher Education). The agency has been an affiliate member of ENQA since 2020. The agency is also working on a process for inclusion in the National Register of Accreditation of Agencies of the Kyrgyz Republic (SAR p.24).

IKCA'S ORGANISATION/STRUCTURE

The executive management of IKCA is undertaken by the director of the agency, who was appointed and is accountable to the founder (IKCA Internal Regulations p.5). The director of IKCA is concurrently general director of the founding entity and director of IKCA. The director of IKCA has overall responsibility for appointment of associate directors and department heads. As illustrated in

the table below, the agency has four departments, including, a ‘Department of Methodology, Monitoring and Quality Assurance’ and an ‘Accreditation Department’.

The agency has 35 full time equivalent staff in total, with 14 regionally based representatives/coordinators. During the site visit meetings with staff representatives and the institutions, the review panel heard that these coordinators promote and market the work of the agency, and act as key liaison and support between the agency and the institutions through the accreditation process. According to the additional information provided by IKCA during the site visit (list of IKCA employees associated with higher education), 21 staff members are involved in the activities of the agency in the area of higher education.

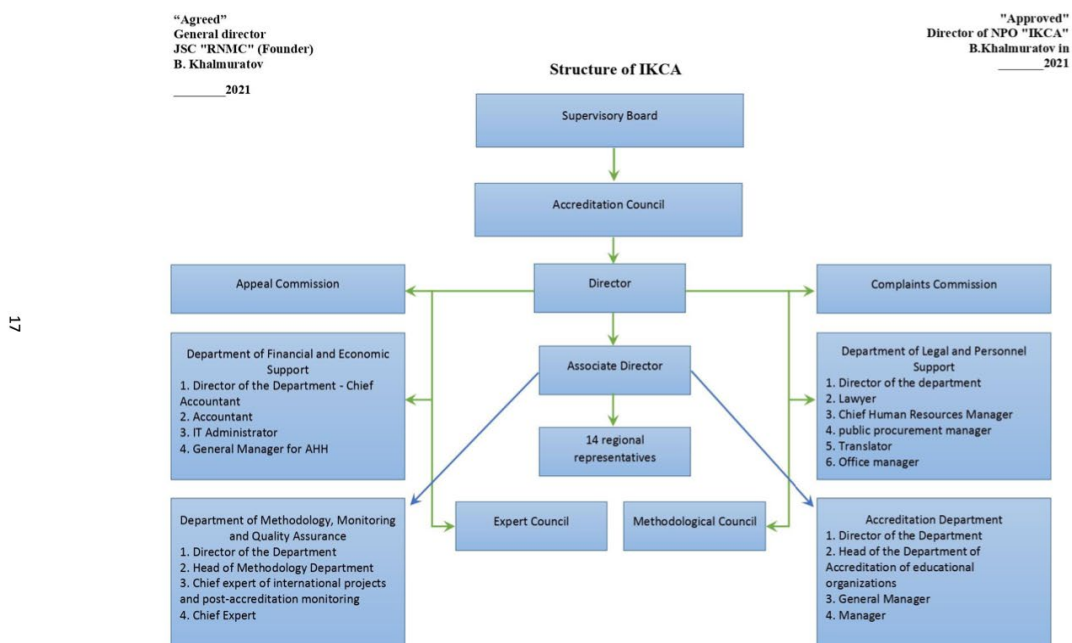


Table 1: IKCA Structure (SAR p.17)

The structure, formation and operation of the agency’s governance is outlined in ‘The Charter of Non-profit institution Independent Kazakhstan Center of Accreditation’ (2021). The agency’s charter states, ‘the supreme governing body of the centre is the founder’ and the main responsibilities of the founder listed include, approval of the chair, deputy chair and members of the Accreditation Council; approval of the regulation and composition of the Supervisory Board and determining the structure and functions of the Director. This is discussed further in ESG Part 3.3 below.

The overarching governance of the agency is the Supervisory Board, the regulations for which are outlined in ‘Regulation on Supervisory Board of the Non-Profit Institution, Independent Kazakhstan Center of Accreditation’ (2021). The Supervisory Board has responsibility for approving the strategic plan and annual reports and overseeing and monitoring the activities of the agency. The Supervisory Board consists of a minimum of five members, external to IKCA, with the chair elected by members

for a period of three years. The current composition of the Supervisory Board includes a student representative. The terms of reference, rights and obligations of the Supervisory Board are outlined within the regulation.

The Accreditation Council is the entity within IKCA's governance which makes the decisions on institution and/or specialised (programme) accreditation. The 'Regulations on the Accreditation Council of the Independent Kazakhstan Center of Accreditation' (2021) sets out the procedures and activities of the Accreditation Council. Membership of the Accreditation Council includes representatives from institutions, state bodies, employers, students, and international experts. The IKCA Director is a permanent member of the Council. The Secretariat for the Council is provided by the IKCA executive.

The composition of the Accreditation Council is approved by IKCA's director, and the chair and deputy are elected by the council members. All members of the Accreditation Council are expected to sign and adhere to a 'Member Code of Honour'. The accreditation decisions of the Accreditation Council, which are approved by the agency's Director are to:

- i. accredit (full accreditation for five years),
- ii. accredit with a condition (incomplete accreditation for one to three years with the requirement to address the condition).
- iii. not accredit.

The institution receives the decision of the Accreditation Council within 10 days of the meeting.

In addition to the decision-making governance structures the agency also has a number of advisory structures in the form of Expert Councils. The provisions for the operation of the Expert Councils are contained within the 'Regulation about Expert Councils, non-profit institution, Independent Kazakhstan Center of Accreditation' (2021). The Expert Councils consist of external experts who operate in an advisory capacity, they do not make any accreditation or operational decisions. The representatives of the Expert Council that met with the review panel, confirmed the Councils met on average twice per year.

The agency has established four Expert Councils which include the:

- I. Expert Council for Higher Education;
- II. Expert Council on Additional Education;
- III. Expert Council for Medical Education;
- IV. Expert Council for Technical and Vocational Education.

As outlined in the internal regulations, the main activities of the Expert Councils include, but are not limited to:

- advising on improvements to standards and guidelines for institutional and/or specialised accreditation,
- selection and advising on training of experts,
- evaluation of interim reports from institutions on the implementation of recommendations of the expert panel and on the procedure of post accreditation monitoring, and
- development of proposals for improving activities of institutions.

Composition of the Expert Councils are approved by the director of IKCA.

IKCA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The external quality assurance activities of IKCA incorporate both institutional and specialised (programme) accreditation in higher education, including accreditation of medical education institutions and programmes.

IKCA also conducts institutional and specialised (programme) accreditation for technical and vocational education and training institutions, and for institutions of additional education. (Note: As outlined previously, the latter are outside the scope of this review).

The main purpose of the agency as outlined within the SAR, is to improve the quality of education at national level through the implementation of accreditation procedures. The key activities of the agency are summarised in the SAR as:

- i. Organisation and implementation of specialised and institutional accreditation of educational organisations.
- ii. Organisational and technical support for the procedures of institutional and specialised accreditation of educational organisations.
- iii. Development of accreditation standards and criteria, guidelines for organising and conducting self-assessment of educational organisations within the framework of institutional and specialised accreditation.
- iv. Conducting external reviews within the framework of institutional and specialised accreditation.
- v. Organising and conducting training seminars for experts, employers and students, creating a database of experts.
- vi. Follow-up procedures after the institutional and/or specialised accreditation of educational organisations, continuous monitoring of the results of evaluation of the quality of educational programmes and activities of educational organisations.
- vii. Analysis of the national education quality assurance system to improve the independent evaluation of the quality of education, taking into account international experience.
- viii. Conducting scientific research in the field of quality assurance of education, including participation in joint international research projects.
- ix. Participation in the work of international quality assurance networks: including, the International Quality Assurance Network in Higher Education (INQAAHE), the Eurasian Education Quality Assurance Network, the Asia-Pacific Quality Assurance Network (APQN), the European Association for Quality Assurance in Higher Education (ENQA).
- x. Organisation and conduct of advanced training courses, international, republican, and regional conferences, seminars in the field of quality assurance in education.

Institutional and Specialised (Programme) Accreditation

IKCA regulations specify that the agency's activities and procedures are devised in accordance with the ESG. The agency develops standards and guidelines based on the principles of external quality assurance contributing to the implementation of quality culture and enhancement of quality assurance systems within educational institutions. The first versions of standards for institutional and specialised (programme) accreditation were developed by IKCA in 2018 and amended in 2021. In parallel with standards, the agency developed comprehensive guidelines for compilation of the self-assessment reports by institutions.

Before commencing an institutional or programme accreditation, IKCA establishes a bilateral agreement with the institution. The agreement includes the main activities of the accreditation process,

such as, pre-accreditation training and support, composition of the expert panel, the schedule and all details relating to the site visit, and all associated costs of the accreditation, conditions of post-accreditation, including post-accreditation follow-up.

The process of both institutional and programme accreditation, involves a number of steps which are aligned to international practice, this includes:

- i. Signing of an accreditation agreement and submission of a self-assessment report by the institution in accordance with standards and criteria defined by IKCA.
- ii. Assignment of an external expert competent panel by IKCA, with international representation.
- iii. On-site visit by the expert panel, and external panel report with recommendations is compiled within two weeks of the start of the site visit. The report is sent directly by the chair or secretary of the panel, and then also to IKCA.
- iv. Consideration of the report and decision on accreditation by the Accreditation Council, in line with its regulations.
- v. Follow-up actions post accreditation, which includes submission of an action plan by the institution, and checking progress in relation to follow-up, with the findings on implementation presented to the Accreditation Council.

The agency maintains a register of accredited universities and programmes, which is published on its website. The institutional and programme accreditation of IKCA for the period 2019-2022 is illustrated in tables 2 and 3 below.

Institutional accreditation						
Type of educational organisation	Period	Total number of accredited educational organisations	Accreditation results			
			5 years	3 years	1 year	denied
Organisations of higher and postgraduate education	2019					
	2020	2			2	
	2021	1	1			
	2022 (until July 1)	2		1	1	
Organisations of technical and vocational education	2019	46	45	1		
	2020	200	195	5		
	2021	33	31	2		
	2022 (until July 1)	1	1			
Organisations of additional education	2019	11	7	4		
	2020	4	3	1		

	2021	4	2	2		
	2022 (until July 1)	2	2			
TOTAL:		306	287	16	3	

Table 2: Institutional Accreditation (SAR pp.25-26)

Specialised (program) accreditation						
Type of educational organisation	Period	Total number of accredited educational programs	Accreditation results			
			5 years	3 years	1 year	denied
Organisations of higher and postgraduate education	2019					
	2020	14	14			
	2021	10	10			
	2022 (until July 1)	48	38	9	1	
Organisations of technical and vocational education	2019	270	267	3		
	2020	663	656	7		
	2021	147	144	3		
	2022 (until July 1)	27	26	1		
TOTAL:		1179	1155	23	1	

Table 3: Specialised (Programme) Accreditation (SAR p.26)

In 2020, the accreditation certificates of two universities - Astana University and Aktau Humanitarian and Technical Academy were withdrawn. The universities were accredited for 1 year with a condition and they did not fulfil the condition set. In 2022, accreditation certificates were revoked from 4 organisations of additional education, for specialised accreditation.

Programme accreditation activity by comparison to other recognized QA agencies in Kazakhstan is illustrated in table 4.

Agency	BA programmes	MA programmes	PhD programmes	Total
IAAR	1043	643	216	1902
IQAA	931	490	133	1554
ACQUIN	129	100	45	274

ASIIN	35	29	4	68
FIBAA	35	29	13	77
MusiQuE	27	22	10	59
KAZSEE	144	130	62	336
ARQA	121	92	21	234
ECAQA	12	46	5	63
ACBSP	2	5	0	7
IKCA	54	18	1	73
ABET	3	0	0	3
TOTAL:	2536	1604	510	4650

Table 4: Specialised accreditation in 2022 - comparable with other agencies (SAR p.14)

External Expert Groups

The composition of the external expert group for external accreditation processes includes a chair, one international expert, two or more national experts, one representative of employers, and a student member for institutional accreditation. The expert group is managed by the IKCA coordinator for the accreditation process. International experts are included in the external expert groups for institutional and programme accreditation, and the Accreditation Council has two international members. IKCA has established an experts' pool which currently includes over 800 experts, including 750 national experts that have been certified and trained by IKCA and 30 international experts from 12 countries. The review panel had sight of the experts list, which is maintained on an excel file, during the main review visit.

National and International Cooperation

The SAR outlines the ambitious plans of IKCA to further develop both national and international partnerships with other organisations and QA agencies, including with specific employer associations. IKCA is an affiliated member of ENQA, and a full member of NQAAHE (International Agency for Quality Assurance in Higher Education), and APQN (Asia-Pacific Network for Quality Assurance in Higher Education).

IKCA'S FUNDING

IKCA office facilities are housed within two office buildings in Astana, which contain employee offices, archive offices and storage rooms, and conference meeting facilities with video conference facilities. The owner of the buildings is the founder, but the founder provided IKCA with life-long usufructuary rights for the offices and facilities therein, therefore the agency does not incur any lease/rental costs.

According to the SAR and confirmed by the review panel during the site visit, the legislation in Kazakhstan does not provide for the financing of independent agencies from the state budget. Accreditation of educational organisations and educational programmes is carried out at the expense

of the organisation of education (paragraph 4 of Section 9-1 of the Law “On Education”). The main source of income of the IKCA is the provision of accreditation services to educational organisations.

The agency is non-profit, self-funding, the costs of all accreditation activity and related expenses of the experts is agreed in advance with the institutions through a bilateral agreement. The amount included in the agreement covers all costs associated with the accreditation process, including all pre-accreditation training seminars.

The budget of the agency as outlined in the SAR amounted to approximately €6000,000 in 2019, €1.3 million in 2020 and €640,000 in 2021, the share of higher education is currently on average €15,000 per year.

During the site visit additional information on income and expenditure for higher education was provided to the review panel by the IKCA accounting department as follows: on average, 7 million 430 thousand tenge comes from higher education institutions as payment for accreditation procedures (aprox €15,000), this is income. From this, the salary fund includes 2 million 229 thousand tenge (aprox €4,500), which is 30%, taxes and mandatory payments to the budget amount to 892 thousand tenge (aprox €1800) = 12%, 1 million 486 thousand tenge = 20% are spent on paying for the services of experts (aprox €3,000), 2 million 229 thousand (aprox €4,600) are allocated for the development of the IKCA tenge = 30%, 594 thousand tenge (€1200) = 8% is allocated for staff training.

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

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

Evidence

The mission and purpose of IKCA's are published on the agency's website, and contained within the [Development Strategy 2021-2025](#) and published on the website. A further document, [The IKCA Charter](#) also available on the website, and contained within the 'IKCA Internal Regulations' sets out the main purpose, objectives and formation and procedure of the governance structure of the agency.

IKCA conducts the following external quality assurance activities that fall within the scope of the ESG; institutional accreditation of higher education institutions, specialised (programme) accreditation of institutions of higher education as well as accreditation of medical institutions and medical programmes.

IKCA has extensive experience in accrediting institutions and programmes in the area of technical and vocational education (VET). To date, over 90% of the scope of IKCA's QA activities have been conducted in the area of technical and vocational education (see also tables 2 and 3 above). Therefore, it is clear to the review panel that at the time of the review, the agency was operating mainly in the area of VET. However, changes in the legislation, which increased the role of the ministry in external quality assurance of VET institutions, have prompted IKCA to make a strategic decision to expand the agency's activities in the field of higher education.

According to SAR, 'IKCA directs its activities to meet the needs of all stakeholders: students and their parents, academic staff, educational organisations, government agencies, employers and society as a whole' (p. 27). The mission of the agency is 'to assist educational organisations in developing a culture of quality, competitiveness and attractiveness at national and international level'. The IKCA Charter outlines a number of key functions and activities of the agency, including, the development of a methodology for ranking educational organisations and conducting scientific research in the field of quality assurance of education are mentioned. However, during the site visit, the review panel heard that some of the activities, including ranking and scientific research are still in the phase of planning, while the task of providing methodological and advisory assistance to educational organisations on accreditation issues, as well as consulting services on review and evaluation of the quality of education, was removed from the charter by founder's decision on 1 June 2022.

IKCAs development strategy identifies 3 long-term goals:

- i. Contribute to the improvement of the quality of educational activities through external evaluation and accreditation of educational organisations and educational programs.
- ii. Create an enabling environment for improving the quality of education through the dissemination of good practice in the field of quality assurance.
- iii. Carry out activities for the compliance of the centre with the basic requirements of full membership in the European Association for Quality Assurance in Higher Education (ENQA) and its inclusion in the European Register for Quality Assurance in Higher Education (EQAR).

The first goal comes with specific metrics (to cover up to 10% of organisations with external evaluation in VET and higher education), which the panel acknowledges is a challenging task in the competitive external quality assurance market in Kazakhstan. A copy of the Annual Work Plan was provided to the review panel as part of the request for additional information in advance of the site-visit, this listed concrete activities planned for the year 2022.

During the meetings with the review panel, the staff and the members of Supervisory Board, Accreditation Council, Expert Councils as well as experts were aware about the mission and goals of the agency and confirmed that they are eager to contribute to the realisation of this mission and share the values of the agency.

IKCA involves stakeholders in the governance of the agency via different bodies, the Supervisory Board and Accreditation Council include academic representatives, employers, and students. The composition of the Supervisory Board is approved by the agency's founder, the composition of the Accreditation Council is approved by the director. The selection process for members of these governance is not regulated. During the interviews with the review team the members confirmed that they received an individual invitation to participate.

IKCA has also formed four Experts Councils involving academic and industry experts. Students are not involved in the work of Expert Councils. The purpose of the work of the Expert Councils is to discuss the needs for improvement of IKCA activities and propose amendments to IKCA regulations. Members of Expert Councils are experienced experts who are actively involved in accreditation procedures.

Analysis

The review panel confirms that IKCA carries out EQA activities on a regular basis. The procedures and activities of the agency in higher education have been variable, but their volume is expected to increase in the near future. The number of higher education applications for accreditation is expected to grow if the agency is registered in EQAR. Representatives of the institutions the panel met with during the visit, expressed their willingness to continue to cooperate and work with IKCA, though some also had experience of accreditation with other QA agencies both local and international.

By the time of the review the objective of providing methodological and advisory assistance to educational organisations on accreditation issues, as well as consulting services on review and evaluation of the quality of education, was removed from the charter and the ranking of institutions was not started. The IKCA are aware of the need to make a clear distinction between EQA and other activities which may be potentially in conflict.

The panel considers that the mission statement of IKCA sets clear aims for its activities and is well perceived by the stakeholders. The values of the agency are shared and carried forward by the staff and members of the governing bodies of the agency. It was evident to the panel from all its meetings

that the agency takes care of the mission, goals and values as defined in the strategic development plan and other documents, and that the external stakeholders appreciate the agency's support and acknowledge their input in improving the quality of higher education in Kazakhstan.

However, the agency's Strategic Development Plan is a relatively modest document that contains limited objectives and does not set specific and measurable goals. The Annual Work Plan provided to the panel as an additional document did not provide any meaningful information on the internal processes for tracking and monitoring implementation of strategic objectives and did not seem to be a document which was actively engaged with by agency staff and/or the senior management team. The utility and functionality of the document provided is unclear to the review panel. The panel did not see evidence of staff involvement in the strategic planning and monitoring process. During the panel's discussions with the senior management team, the review panel were unable to confirm their role in monitoring implementation of the strategic objectives.

During the review panel meetings with representatives of the Supervisory Board and Accreditation Council the review panel were able to ascertain that both entities had had sight of and approved the development strategy, but representatives could not confirm they had been involved in any process of consultation in its' development or in tracking/overseeing its implementation. During the review panel meetings with the institutions, external experts, and students, it was clear to the review panel that these stakeholder groups had not been involved in or provided feedback on the agency's strategic development process. Therefore, it can be said that while stakeholders are well represented in the governing bodies of the agency, their involvement in strategic development activities could be more systematic and effective.

Panel recommendations

1. The review panel recommends that IKCA supplement the Strategic Development Plan with goals and objectives that are clearly related to the agency's mission, while being specific and measurable and allowing each staff member to relate to them and integrate them into their daily work.
2. The review panel recommends that IKCA involve external stakeholders and members of the agency's governing bodies in the governance of the agency in a more systematic and efficient way.

Panel suggestion for further improvement

1. The review panel suggests that IKCA establish formal and systematic strategic monitoring and annual planning processes within the senior management team and agency staff.

Panel conclusion: 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

The IKCA is a non-profit organisation registered in 2016 with the Department of Justice of Astana. As outlined in the SAR, by order of the Ministry of Education and Science No. 624 dated November

9, 2018 'On recognition of the Accreditation Body and inclusion in the Register of Recognized Accreditation Bodies (Register 1) for a period of five years', the IKCA was registered in the National Register of Accreditation Bodies. The national register contains the list of competent organisations that are authorised to conduct institutional and specialised accreditation of educational organisations in the Republic of Kazakhstan.

Upon recommendation of the IKCA accredited educational institutions and educational programmes were included into the National Register 2 and the National Register 3. These are registers of accredited educational organisations and educational programmes which are included on the registers by the Ministry of Education and Science of the Republic of Kazakhstan based on certificates and information from recognized accreditation bodies.

Analysis

The legal status of IKCA is clearly defined and evident with the documentation. During the site visit the review panel were able to confirm the agency's status in its interview with the representatives of the Ministry. The quality assurance accreditation activities of IKCA and other accreditation agencies within Kazakhstan is supported by the Ministry in its strategic aim of enhancing quality and recognition of higher education in Kazakhstan.

Panel conclusion: 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.

Evidence

IKCA is an independent not for profit organisation. The Ministry of Education and Science establishes the requirements and procedures for recognition of accreditation bodies and regulates the activities of accreditation agencies but does not interfere in the work or functions of the accreditation agencies. IKCA is independent in its accreditation activities.

The appointment of stakeholders to the agency's governance councils, the Supervisory Board and Accreditation Council, and of external experts is undertaken directly by the agency, independent of third parties, though nominations may be sought from third parties, such as institutions, or employer representative bodies. External experts are informed that though they may be nominated by a third party, they are acting in a professional individual capacity and not as a representative of their constituent organisation. Independence of the formal outcomes in the agency's accreditation processes is assured through the agency's governance process, namely the Accreditation Council.

The review panel found limited information in the SAR in relation to ESG 3.3. The main evidence which the review panel found relevant to this standard was in the additional documents provided, namely:

- I. IKCA Charter, Article 3,

- II. Guidelines for Quality Assurance,
- III. Regulation of the Accreditation Council, Articles I and 3.

However, the documents which the panel reviewed in detail and further additional material requested by the panel in advance of the visit, did not sufficiently clarify the questions arising for the panel with regards to independence. The documents and evidence available to the review panel regarding procedures for selection, and recruitment of staff, for the selection of members of the Supervisory Board and Accreditation Council, or for the selection and certifications of experts, did not provide clarity on specific recruitment and selection policies or processes.

During the site visit, the review panel discussed the main issues and what they perceive as gaps in the procedures in their interviews with the agency director, representatives of the Supervisory Board, representatives of the Accreditation Council, the agency staff, and the external experts.

Analysis

The panel were assured and confident in their discussions with representatives of the Supervisory Board and Accreditation Council of the integrity of the representatives and the work of both governance entities, no direct issues, or concerns with regards to any interference in their work was raised. However, following the review of all relevant documentation and interviews with the agency director, the review panel remains concerned with regards to some elements of both organisational and operational independence of the agency, in particular the strong role of the founder in the governance of the agency.

Organisational Independence

According to the IKCA charter, the internal regulations, and through the various on-site interviews, the review panel clarified that the agency's governing and advisory bodies selections, nominations, appointments, and termination are dependent on agreement with the founder, either directly or indirectly through the agency director. Since 2020, the director of the agency is also the general director of the founding entity. During the site visit, the review panel confirmed the interdependency and governing authority of the founder, as explicitly stated within the charter. The authority of the founder includes:

- 'Determination of competencies, organisation of the structure, procedure for the formation and termination of powers of the Director of the Center,'
- 'Approval of the Regulation on the Supervisory Board of the Center and the composition of the Supervisory Board; and 'issuance of orders to terminate the activities of the Supervisory Board and the powers of its composition,'
- 'Approval of the Chairman, Deputy Chairman of the Accreditation Commission of the Center and members of the Council.' (p.4).

The charter also states that the:

- 'Director of the Centre approves the regulations on the Accreditation, Methodological, Expert Councils, the Complaints Commission and the Appeal Commission'.

Within the 'Regulation of the Accreditation Council' the composition of the council, the procedures for conducting meetings, and making decisions are outlined. It is stated within these regulations that, 'the selection procedure is carried out based on the recommendations of the authorized bodies and / or unions of employers / associations and students.' However, based on the documents provided and during the site visit interviews, the review panel were not able to confirm an independent process by which members are selected or elected. The review panel ascertained that they were informally chosen by group discussions and by relying on communications from and solicitations to an external network of acquaintances. A draft list is prepared, and from this list final approval/appointing is up to

the director. This is explicit within the Regulation of the Accreditation Council, 'The composition is approved by the order of the director of the IKCA' [also the general director of the founder entity].

According to the agency's charter, the IKCA Director:

- 'creates Expert Councils,'
- 'approves the regulations on the Accreditation, Methodological, Expert Councils, the Complaints Commission and the Appeal Commission,'
- 'approves the composition, Chairman and members of the Complaints Commission and the Appeals Commission' (p.7).

Also stated within the charter, the founder has the authority to amend the charter itself and terminate the activities of the agency governance and advisory bodies, or amend their regulations; and the founder may 'voluntarily' reorganise the agency (or close it):

'the exclusive competence of the Founder includes...voluntary reorganisation and liquidation of the Center' (p.5).

The review panel therefore concludes that the founder is an integral part of the agency's governance (as stated in the charter, 'the supreme governing body of the center is the founder'). The organisational structure provided within the SAR (p.18) does not include the founder within the agency structures. The founding entity is a 'for-profit' entity and thus would not be eligible to be registered as a national accreditation agency within Kazakhstan. The review panel has several concerns with regards to the structure and operational independence of the IKCA.

Operational Independence

According to the agency's charter, the internal regulations and during the on-site interviews, the review panel clarified that the agency's financial and personnel resources, including selection, recruitment, and managing of staff nominations, are in the ultimate control of the founder, either directly or indirectly through the director. Further inquiries by the panel during the onsite visit clarified that the allocation of staff and the needs for recruitment are discussed informally by the directors of the four departments with the director of the agency, and then the recruitment and selection process and outcome is decided by the director. No documented human resource policy and procedure for advertising new positions and selecting candidates was ascertained by the panel.

According to responses by student, academic and professional experts during the visit, the recruitment of new experts seemed to be based on self-selection and expressions of interest and nominations from university management. The experts are trained through training workshops organised by IKCA, and subsequently certified for inclusion in the expert database. The members of each External Experts Group (EEG) for a specific institutional or programme accreditation are selected by the staff of the Accreditation Department based on the field of expertise, informally discussed with the department director, and proposed composition of the EEG is sent for approval to the agency director. The final appointment of the EEG members is by the agency director, as documented in the 'Guidelines for the organisation and conduct of external examination (audit) in the process of accreditation of educational organisations.' The role of the director, and interdependency between the agency director and the founder, raises some concerns for the review panel with regards to operational independence and the potential for undermining this within current agency processes.

Independence of Formal Outcomes

During the on-site interviews with the directors and staff members of the Accreditation Department and of the Methodology Department, with student, academic and professional experts, and with representatives from higher education institutions, the review panel was able to ascertain that the Agency's 'Guidelines for organising and conducting external evaluation as part of the accreditation of educational organisations', the 'Standards for institutional accreditation for Higher Education Institutions', and the 'Standards for specialised accreditation for Higher Education Institutions' are accurate descriptions of the steps and procedures that lead to the drafting of the final accreditation report, and to the approval of the final accreditation decisions by the Accreditation Council. Internal staff and external stakeholders all expressed confidence in the processes.

Even though there are no explicit measures within the agency to prevent undue influence of institutions or stakeholders, and the panel have concerns with regards to the agency's charter, in particular the authority of the director and founder, the agency staff, representatives of the Accreditation Council and external experts did not report any external influence or interference with their work. The review panel notes the representatives from the HEIs were enthusiastic about the high level of quality of the whole accreditation procedures and their outcomes. Furthermore, the accreditation decisions by the agency are final decisions, and no other decisions are to be taken by other bodies based on the agency's outcome.

Panel recommendations

1. The review panel recommends that IKCA review its regulations and charter to ensure a clear separation of responsibility and authority between the agency's director, founder, and the governing entities and processes for the agency's accreditation processes, ensuring autonomy and independent decision-making processes for the agency's governing bodies.
2. The review panel recommends that IKCA develop and publish a transparent policy and procedure for the recruitment and selection of staff.
3. The review panel recommends that IKCA develop a transparent process and set of criteria for recruitment of external experts and internal governance for compiling and approving external expert groups.

Panel conclusion: partially 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.

According to the SAR, 'the IKCA regularly prepares thematic analyses. The results of the external evaluation are summarized in the annual reports of the Center, which contain an analytical review of the results of accreditation of educational organizations and educational programmes over the past years' (p.30). Also, according to the SAR, several thematic analyses were conducted in 2021-2022, and the agency uses results for continuous improvement of accreditation procedures and standards.

In advance of the site visit the review panel considered the following evidence in its evaluation of compliance with ESG 3.4:

- the SAR,
- the agency's strategic development plan,
- the published thematic analysis on 'academic mobility of students and teaching staff on the results of accreditation educational programs higher education institutions.

A review of the agency's website by the review panel confirmed the agency has published on its website one thematic analysis, a short eight-page report on 'student and teacher mobility in Kazakh HEIs' (2022). The review panel requested further examples of thematic analysis but did not receive additional evidence in advance of the site visit.

During the site visit the annual report to the Ministry 'on the activities of the IKCA, year 2020', and a thematic analysis on 'the results of accreditation of educational bachelor programmes in specialties business, management and law', were both received in hard copy and considered by the review panel.

Analysis

The SAR was somewhat self-contradictory and confusing for the review panel with regards to standard 3.4. The evidence was not available to the review panel for the several thematic analyses referred to as having been conducted in 2020-2021, the review panel concluded and confirmed during the visit that these had not been completed. Neither was the review panel able to ascertain, as it did not see evidence, on how results of thematic analyses are used for continuous improvement of accreditation procedures and standards within the agency, or what corrective or preventative actions have been taken resulting from thematic analysis, as attested to in the SAR.

The panel acknowledges that IKCA is a relatively young agency, and that the agency itself recognises within the SAR and confirmed to the panel during the site visit, that implementation of this standard (ESG 3.4) is a significant challenge for IKCA.

The review panel is of the view that currently, IKCA does not have the necessary resources or expertise to conduct and demonstrate the results of thematic analyses, or to undertake research activities and reports as planned. Through its SWOT analysis the agency itself has identified as a weakness, the lack of joint projects with foreign partners and the lack of experience in developing educational projects. However, the review panel acknowledges that IKCA is conducting some analytical work as described above.

During the onsite visit, the panel's discussions with the Director of the Department of Methodology, Monitoring and Quality Assurance resulted in two more reports being made available to the panel, these were in hard copy and are not published on the website. The first, a thematic analysis on 'the results of accreditation of educational bachelor programs in specialties business, management, and law', is the collation of results from EEG reports of the external accreditation for business, management, and law programmes by the University of Kunaeva, and of economics by University of Bolashka (published on the website). These reports are a collation of results, and as no further analysis is undertaken by the agency, apart from a very short and perfunctory conclusion, the review panel concludes they do not constitute publishable thematic analysis.

The second document considered by the review panel, the report to the Ministry for year 2020, is a 61-page report of tables of programmes and institutions visited by IKCA. There are some analyses, but they concern the IKCA activities and organisation (with a SWOT analysis very similar to that included in the SAR), rather than the higher education system. Thus, the panel concludes also that this

report does not constitute a thematic analysis, though it is a useful document to provide information to the general public on some relevant issues in higher education. The agency confirmed to the review panel that this section of the SAR, with reference to thematic analyses, was drafted in 2021, when the agency was hopeful that they would have published more completed thematic analyses on their website, in advance of the ENQA review panel site visit. The challenges experienced in developing and publishing thematic analyses was included within the SAR to reflect the issues the agency has experienced in this standard.

It was confirmed to the review panel during that site visit that the Director of the Department of Methodology, Monitoring and Quality Assurance, who is providing the expertise for thematic analyses, had only joined IKCA in 2021. During discussions with the relevant director, it was also confirmed to the panel that as a new agency in the field of higher education, the agency does not currently have sufficient volume of activity for meaningful thematic analyses. Furthermore, the review panel learned that the relevant department is lacking specialised staff to dedicate to data analysis and the drafting of thematic analyses reports.

Both the director and the departmental staff that were interviewed by the review panel showed a deep awareness of the importance, for an accreditation agency in higher education, to develop and routinely publish thematic analyses on focus topics critical for higher education. The review team notes a greater effort on data gathering and analysis for better knowledge of the higher education system are key tasks in the agency's strategic plan, namely:

- 'analysis of the national system for ensuring the quality of education to improve the independent assessment of the quality of education, taking into account international experience,'
- 'conducting scientific research in the field of ensuring the quality of education, including participation in joint international research projects'. (Strategic Plan, p. 12).

Though the panel notes 'thematic analysis' and 'periodic publishing' are not explicitly included as strategic objectives.

As a result of this manifest awareness of the importance of publishing thematic analyses periodically, and strong commitment to do so, the review panel concludes that the current lack of thematic analyses, and lack of provisions for conducting them regularly, is caused by the fact that the agency is very young and has only commenced its activities recently, and thus the panel has concluded the agency is currently in partial compliance, with commitment to further development.

Panel recommendations

1. The review panel recommends that IKCA add expertise and competence in quantitative and qualitative data analysis to its current resources, to enhance the agency's capacity to analyse data from external QA activities and for development of thematic reports that would increase public awareness and enhance quality of higher education in Kazakhstan.
2. The panel recommends that IKCA insert an explicit statement within its strategic plan committing to the publication of thematic analyses on a predetermined periodic basis, such as one analysis per year and on relevant topics, with the actual publication of thematic analyses identified as key milestones in monitoring implementation of strategic goals.

Panel suggestion for improvement

- I. The review panel suggests that IKCA proactively consult with experts and stakeholders to identify relevant system level topics for thematic analysis for the enhancement of quality assurance in higher education.

Panel conclusion: partially compliant

ESG 3.5 RESOURCES

Standard:

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

Evidence

Human Resources

The SAR was somewhat confusing for the review panel with regards to the agency staffing structure and human resources. The SAR mentions that IKCA has '14 regional' branches but did not include information on the structure and functions of these branches and their relationship with IKCA central office. The review panel confirmed during the site visit that these are 14 regionally based individual staff. The SAR states that 'the number of employees is sufficient', and 'all functions are fully distributed', but it was unclear to the review panel from the SAR and additional information provided, as to how responsibilities and functions are distributed. Some additional information on staffing, including job descriptions and responsibilities was provided to the panel during the site visit and the panel had the opportunity to consider all the necessary information concerning staff.

During the site visit the review panel confirmed that IKCA has 35 full time equivalent staff members, but not all these staff work in the area of higher education. The agency's staff are spread across the four main departments as illustrated in the organisational structure in table 2 above, this includes 14 full time regionally based coordinators. These regionally based coordinators promote the work of the agency and coordinate and support accreditation processes in their individual regions. The agency is headed by the director, whose authority is described in the agency's charter and outlined in detail in ESG 3.3. above. According to the SAR, the number of employees is sufficient, all functions are fully distributed, and in the case of an increase in the volume of work, it is possible to introduce new units and expand the number of employees. The principles and procedures for the selection, training and development of employees are contained in the agency's 'Guidelines on the Internal Quality Assurance System'. The SAR notes the roles of the Accreditation Council and Expert Councils in supporting the activity and work of the agency in performing its functions.

Financial and Physical Resources

As outlined in the SAR, IKCA is a non-profit organisation, the revenues of which are directed to the development of the agency. The Kazakh legislation does not provide for financing of agencies from the

state's budget, so IKCA is not in receipt of any direct state funding, the main source of income is IKCA accreditation services provided. IKCA confirms within the SAR, that the agency plans to participate in national and international research grants to attract sponsorship, but this work has not yet commenced. Total budget figures are provided within the SAR (p.32) and some additional information on income and expenditure was provided to the review panel as part of additional information requested (see section on agency funding, p.18). The agency's premises are provided free of charge by the founder, so the agency does not incur lease or rental costs. The agency has a range of physical resources and equipment, including staff laptops, and the agency owns a number of executive cars.

Analysis

Human Resources

During the site visit the panel met with all the agency staff and had the opportunity to review job descriptions. Staff have a high level of qualifications, and though they have been involved to date mainly in the area of vocational education, the panel were assured and confident in their meetings with staff of the competency and capacity of staff to adapt and develop necessary skills for higher education. Staff are aware of the additional training needed and are keen to develop their skills. A budget has been allocated by the agency to staff training. The panel confirmed the agency staffing is fit for purpose and the agency confirmed additional staffing and resources would be made available if required.

The agency recognises and has identified within its own reflections in the SAR, that though agency staff do undertake some professional development, further work needs to be undertaken to enhance the competence and skills of staff to support the future work and activities of the agency (p.35). Also noted and recognised is that the agency may need to create new positions and expand its staff complement with higher education expertise. The agency has identified staff competency and professional development as a challenge within its SWOT (p.62), the review panel would concur with this reflection. During the site visit the review team confirmed that individual staff training plans are not established, and the process of professional development is somewhat informal and ad hoc. There is a high dependency on the director sharing practices and cascading information to staff.

Financial Resources

The review panel was unable to ascertain from the SAR as to whether there are sufficient financial resources to enable the agency to conduct its work in the area of higher education. It is confirmed that the founder provides free premises to IKCA. The SAR reports incomes, but not expenditures and there are no transparent budgetary reports published.

During the site-visit additional financial information was provided to the review panel and the agency's director and chief accountant confirmed the agency was self-funding and self-sufficient. The panel was advised that in the event of an emergency, the agency could request additional resources from the founder, this would be in exceptional circumstances. Within the small scale of the work in higher education currently, the budgetary figures would indicate the process is self-funding, with allocations allowed for staff development (see p.18). As activity expands, the income from higher education institutions will increase and the overall budget will expand. The panel considered the agency to be financially stable.

Panel recommendations

- I. The review panel recommends that IKCA develop a structured and systematic process for the professional development of staff.

2. The review panel recommends that IKCA should invest to enhance the competence and skills of staff to support the future work and activities of the agency.

Panel suggestions for further improvement

1. The review panel suggests that, considering the strategic plans for international development, that IKCA provide opportunities for staff and encourage staff to develop English language skills.
2. The review panel suggests that IKCA explore, through its development partnerships with other agencies, the opportunities for staff mobility and peer learning.

Panel conclusion: 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.

Evidence

According to the SAR the policies and procedures of IKCA are aimed at fostering a culture of quality and continuous improvement. The quality policy of the agency is based on the principle of continuous improvement and the provision of quality services for all its users and mutually beneficial cooperation with stakeholders (SAR, p.36).

The procedures underpinning the internal quality assurance system for IKCA are documented within IKCA QA guidelines which are published on the agency website². An English translated set of quality assurance guidelines was provided to the review panel in the annex documentation of the SAR. An additional document, 'Independent Accreditation Centre of Kazakhstan Internal Regulations' was provided to the review panel during the site visit. These three documents outline a set of principles and values underpinning the work of IKCA.

Within the IKCA QA Guidelines provided to the review panel as an annex to the SAR, the agency attests to the following values underpinning its work:

- Professionalism and quality,
- Independence and impartiality,
- Respect and trust,
- Cooperation,
- Innovations (IKCA QA Guidelines p. 8).

The guidelines also note that IKCA activities are based on the following principles: transparency, objectivity, consistency, confidentiality, efficiency, involvement of all stakeholders, cooperation, and partnership.

² See here: <https://nkca.kz/ru/rukovodstva-nkca>

Within the context of the accreditation work of the agency, the guidelines include additional principles of: voluntariness, responsibility, transparency independence, confidentiality, and effectiveness - (QA Guidelines p.17). The internal regulations also include the values of IKCA, these are mutual trust, integrity, relevance, innovation, academic quality, practical relevance and data-driven decision-making and analysis (Internal regulations p.5).

The guidelines on quality assurance provide an overarching description of approach and activities within the following areas:

1. Agency's mission, goals, objectives, and strategic development process
2. Agency structure, resources, human resources, infrastructure, and financing
3. Internal quality assurance system:
 - i. Document management system,
 - ii. Management responsibility,
 - iii. Quality assurance and accreditation principles,
 - iv. Description of Accreditation Council,
 - v. Description of Expert Council and Expert Commission,
 - vi. Description of the database of experts,
 - vii. Process for developing accreditation standards and guidelines,
 - viii. Rules and procedures for the accreditation process, including requirements for developing the external evaluation report,
 - ix. Appeals and Complaints procedures,
 - x. Post accreditation monitoring.

The agency's 'Development Strategy of the IKCA 2021-2025' (p.10) and the internal QA guidelines (p.6), state the mission of IKCA as 'assisting universities in creating an effective system for ensuring the quality of education and management systems in educational organisations that implement programs at all levels of education and additional education, using the procedures of institutional, specialised accreditation and rating studies'.

The 'Independent Accreditation Centre of Kazakhstan Internal Regulations (2022)' provided to the review panel during the site visit states the agency missions as being 'to assist educational organisations in developing a culture of quality, competitiveness and attractiveness at national and international level' (p.3). Though there would seem to be two mission statements, both expressed somewhat differently, both attest to the agency's commitment to enhancement and development of quality.

The SAR outlines the approach to developing the agency's Development Strategy 2021-2025, and strategic goals and objectives, which according to the SAR, were developed through consultation with representatives of the Supervisory Board and Accreditation Council and with national and international experts. Also, according to the SAR, implementation of the strategic objectives is reviewed regularly and is the basis for Annual Work Plans.

Within the context of feedback on the agency's processes, the SAR outlines an important element of the internal quality assurance system, as being the process of conducting surveys and seeking feedback from institutions and experts. Samples of the questionnaires were provided to the review panel in the annex documents to the SAR. According to the SAR the results of these surveys are analysed and

used to write an annual report for the Ministry, and the report also forms the basis of corrective action within the agency (SAR pp.36-37).

According to the SAR, upon completion of the external review of the university/programme, the IKCA conducts an online survey of coordinators, the university representatives, and domestic and international experts. The information obtained from online surveys is used to improve the external evaluation procedure.

The internal quality assurance guidelines and internal regulations include the regulations and general provisions on the operation and activities of the Expert Councils. The Expert Councils are permanent groups of external experts that provide external advice and support to IKCA. The activities of the Expert Councils include examining proposals for improvement of documents regulating the activities of IKCA. (Internal Regulations, p.26).

The 'Code of Honour' for all employees of IKCA, contained within the internal regulations, establishes a set of norms and rules which employees are required to agree and adhere to, to ensure ethical, integral, and professional behaviour of the agency's staff. A code of honour is also in place for external quality experts that conduct accreditation on behalf of the agency.

Analysis

The review panel found the internal quality assurance guidelines and the internal regulations to be informative in describing the main activities of the agency and providing a description of some of the internal processes. The guidelines and regulations both describe who is responsible for what, and the key documents that are produced. The values underpinning the internal quality assurance system of the agency are clearly articulated in both the internal quality assurance guidelines and internal regulations.

The review panel notes some inconsistencies of terminology, such as *guidelines* and *manual*, inconsistency in the mission statement, and some duplication across the different documents. The distinct purpose of the different documents, with differing statements was not always clear to the panel and was somewhat confusing. As outlined above, there are different sets of values and principles outlined in different documents. The review panel acknowledges that issues may arise related to translation of some technical terms and terminology which can give rise to inconsistencies, but efforts should be made to ensure consistency of different sets of documents.

The review panel is of the view that the internal quality assurance guidelines do not make explicit and are not clear on the internal quality assurance workflows or processes of the agency. The processes of internal quality assurances, including the intervening points of stakeholders, the monitoring processes, feedback loops and mechanisms, are not clearly described or illustrated.

The mechanism for providing feedback on the agency's accreditation process is through questionnaires of institutions and experts on completion of the accreditation process. The panel heard of feedback provided by the agency's regional coordinators on individual experts, but in its interviews with agency staff involved in external accreditation, with experts and with institutional representatives, many seemed unaware of any follow-up survey, some had experienced it, some not, it was clear to the panel that experiences differ. It is not evident to the review panel that there is a systematic process in place for considering external feedback and how this feedback is used to contribute to continuous

improvement within the internal agency processes. The panel was able to confirm that feedback is sought but was unable to ascertain specific examples of improvements made as a result of the post accreditation feedback survey.

During interviews with external experts and the institutions, some seemed to have had an opportunity to provide feedback through a questionnaire, and others mentioned the importance of the agency's 14 regional staff members, in being able to channel direct feedback through. During interviews with staff, the review panel did not hear of specific examples of improvements made to the agency's internal processes or any corrective action taken as a result of external feedback received.

During its meeting with representatives of the Expert Councils, the representatives confirmed the councils had met twice over the past year, their role remained unclear to the review panel. The review panel is of the view the Expert Councils could be better utilised to provide qualitative feedback in the development process of the agency's quality assurance procedures, standards, and criteria. It was evident to the review panel that the Expert Councils had not been involved in any improvement-oriented process, or that their feedback had not been sought on any specific developments. It would seem to the review panel, the Expert Councils, though established, are underutilised by the agency.

In its meetings with a wide range of external representatives during the site visit, including, representatives from institutions, external experts, expert councils, industry and students, the review panel heard consistently of the professionalism of IKCA staff, all of which it was clear to the review panel, are held in high esteem by external stakeholders. The institutions noted in particular the value and importance of the work of the regional representatives in the process.

Panel commendations

1. The review team commends the agency's staff for their professionalism and commitment as attested to by institutions and other external stakeholders.

Panel recommendations

1. The review panel recommends that IKCA review its internal quality assurance guidelines, internal regulations and its suite of quality assurance documentation to:
 - a. remove inconsistencies and duplication within and between documents;
 - b. clearly indicate the responsibility at all stages within the accreditation process;
 - c. clearly indicate the feedback loops and monitoring stages.
2. The review panel recommends that IKCA establish internal mechanisms to enable systematic feedback and engagement from all staff in the strategic development and monitoring processes.
3. The review panel recommends that IKCA fully implement the functions of the Expert Councils and systematically embed the Expert Councils within the agency's consultation and improvement processes.

Panel suggestions for further improvement

1. The review panel suggests that IKCA encourage internal staff and external stakeholders to provide constructive, improvement-oriented feedback on the activities of the agency, to enable the agency to develop and continually improve its work.

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

This is the first ENQA review of IKCA to evaluate compliance with the ESG, though as outlined previously, the agency is currently an affiliate member of ENQA. Participation in this ENQA review process is evidence of the agency's strategic commitment to obtaining membership of ENQA and inclusion in EQAR, both of which are strategic priorities for the IKCA. According to the legislation in Kazakhstan, the agency must be included within EQAR in order to become a recognised accreditation agency for institutions and programmes in higher education. IKCA is required to confirm recognition at national level every five years, the next recognition process by the Ministry is in 2025 (SAR p. 38).

Analysis

As outlined in the SAR and the agency's internal quality assurance guidelines, external evaluation of quality of IKCA activities is considered a valuable tool for quality enhancement and improvement. During the site visit the review panel were assured and confident of the strategic commitment of IKCA to becoming a member of ENQA and to being included within EQAR. This strategic goal is supported by the senior management team and director, and representatives of the agency's Supervisory Board and Accreditation Council. Though external evaluation against the ESG is not in itself a specific legal obligation for the agency, the review panel concludes that the requirements and criteria for recognition of accreditation bodies within Kazakhstan regarding ENQA membership and inclusion in EQAR render periodic external reviews mandatory for IKCA, and this is accepted by the agency.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

Evidence

In the area of higher education, IKCA has developed standards for institutional accreditation of organisations of higher and post graduate education, standards for specialised programme accreditation, for organisations of higher and postgraduate education as well as standards for accreditation of medical institutions and accreditation of medical programmes. During the time of the review of IKCA, no accreditation of medical institutions or medical programmes had been conducted by the agency. The first accreditation based on the medical standards will be held in 2023. As

mentioned in the introductory part of the report, the additional education is provided by non-formal education institutions and is not included in the scope of the review.

There are 4 sets of standards developed by IKCA as outlined in the following table:

<p>1) Standards for institutional accreditation of institutions of higher education</p> <p>Standard 1 Strategic development and quality assurance policy Standard 2 Educational programs Standard 3 Student-centred learning, teaching, and assessment Standard 4 Student enrolment, academic performance, recognition, and qualifications Standard 5 Faculty Standard 6 Research work Standard 7 Student resources and support services Standard 8 Information management and public awareness Standard 9 Periodic external quality assurance</p>
<p>2) Standards for specialised (programme) accreditation of institutions of higher education</p> <p>Standard 1 Policy in the field of quality assurance of the educational program Standard 2 Development and approval of the educational program Standard 3 Student-centred learning, teaching, and assessment Standard 4 Student enrolment, academic performance, recognition and qualifications Standard 5 Faculty Standard 6 Resources and student support Standard 7 Information management and public awareness Standard 8 Regular monitoring, periodic evaluation of educational programs, periodic accreditation</p>
<p>3) Standards for institutional accreditation of medical educational institutions</p> <p>Standard 1 "Mission and Deliverables". Standard 2 "Educational Programs". Standard 3 "Student Assessment". Standard 4 "Students". Standard 5 "Academic staff / teachers". Standard 6 "Educational Resources". Standard 7 "Evaluation of educational programs". Standard 8 "Management and Administration". Standard 9 "Continuous improvement".</p>
<p>4) Standards of specialised accreditation on medical BA programmes</p> <p>Standard 1 "Mission and Deliverables". Standard 2 "Educational Programs". Standard 3 "Student Assessment". Standard 4 "Students". Standard 5 "Academic staff / teachers". Standard 6 "Educational Resources". Standard 7 "Evaluation of educational programs". Standard 8 "Management and Administration". Standard 9 "Continuous improvement".</p>

Table 5: IKCA Accreditation Standards

The review panel notes there is a mismatch between the standards on institutional and specialised accreditations (no 1 and 2) provided to the panel as Annexes to SAR, and those which are published on the website of the agency. All standards are approved in 2021 and are marked as 'second edition', (the first version of standards was developed in 2018). The table prepared by the agency in the SAR (pp.41-44) refers to the versions provided to the panel. There is a difference in the number of criteria under the standards, e.g., 4 criteria instead of 15 in standard 1, 3 criteria instead of 19 in standard about the academic staff. However, as the guidelines for compilation of the self-assessment report within the framework of institutional accreditation and specialised accreditation of the higher education institutions available on the website of the agency, are in accordance with the versions of standards provided as annex to the SAR, the review team used this version as the basis of its analysis.

Since the accreditation of medical institutions and medical programmes was not originally included in the terms of references, and the analysis of these activities is presented in the SAR also, the review panel itself worked out the medical regulations and supplemented the comparative table in SAR with references to standards and criteria in guidelines for the accreditation of medical institutions and medical programmes that are showing compliance with ESG Part I standards. As in the case of regular institutional and curriculum accreditation, the review panel did not use the standards themselves as a basis, but the guideline for compilation of the self-assessment report within the framework of institutional accreditation of medical education institutions.

Standards	The IKCA assessment criteria taking into account the related ESG
1.1 Policy for Quality Assurance	<p>IA: requirements for sub-paragraphs 1.1-1.15 (Criteria for evaluating quality assurance policy).</p> <p>PA: requirements for sub-paragraphs 1.1-1.11 (Criteria for evaluating the policy in the field of quality assurance of the educational program).</p> <p>MedIA: standard 1, criteria 1.1.1.-1.1.2, 1.4.1-1.4.2, criteria 8.4.4-8.4.7 about the publishing and implementing the QA policy, standard 9 Continuous improvement</p> <p>MedPA: standard 1, criteria 1.1.1-1.1.2, , criteria 8.4.4-8.4.7 about the publishing and implementing the QA policy, standard 9 Continuous improvement</p>
1.2 Design and approval of programmes	<p>IA: requirements for sub-paragraphs 2.1- 2.21 (Criteria for evaluating educational programmes),</p> <p>PA: requirements for sub- paragraphs 2.1-2.13 (Criteria for evaluating the development and approval of educational programmes)</p> <p>MedIA: standard 2 Educational programmes</p> <p>MedPA: standard 2 Educational programmes</p>

<p>1.3 Student-centred learning, teaching, and assessment</p>	<p>IA: requirements for standard 3. Students, student-centred learning, teaching and evaluation in sub-paragraphs 3.1-3.19</p> <p>PA: requirements for standard 3. Student-centred learning, teaching and evaluation in sub-paragraphs 3.1-3.12</p> <p>MedIA: standards 3 Student assessment and 4 Students MedPA: standards 3 Student assessment and 4 Students</p>
<p>1.4. Student admission, progression, recognition and certification</p>	<p>IA: requirements for standard 4. Admission of students, academic performance, recognition and qualifications in paragraphs 4.1-4.6,</p> <p>PA: requirements for standard 4. Admission of students, academic performance, recognition and qualifications in paragraphs 4.1- 4.12</p> <p>MedIA: standard 4 Students, 4.1. Admission and selection policy MedPA: standard 4 Students, 4.1. Admission and selection policy</p>
<p>1.5 Teaching staff</p>	<p>IA: requirements for standard 5. Teaching staff in sub-paragraphs 5.1-5.19,</p> <p>PA: requirements for standard 5. Teaching staff in sub-paragraphs 5.1-5.11</p> <p>MedIA: standard 5, 5.1 Selection and recruitment policy MedPA: 5.1 Selection and recruitment policy</p>
<p>1.6 Learning resources and student support</p>	<p>IA: requirements for standard 7. Resources and student support services in sub-paragraphs 7.1- 7.23,</p> <p>PA: requirements for standard 6. Resources and support of students in sub- paragraphs 6.1-6.10</p> <p>MedIA: standard 6 Educational resources MedPA: standard 6 Educational resources</p>
<p>1.7 Information management</p>	<p>IA: requirements for standard 8. Information management and public awareness in sub-paragraphs 8.1.-8.6 (Criteria for evaluating information management and public awareness),</p> <p>PA: requirements for standard 7. Information management and public awareness in subparagraphs 7.1-7.4 (Criteria for evaluating information management and public awareness)</p> <p>MedIA: 6.3.1 The medical education organization must determine and implement a policy that is aimed at the effective use and evaluation of relevant information and communication</p>

	<p>technologies in the educational process. 7.3.2 The medical education organization should analyse the educational achievements of students.</p> <p>MedPA: same as Med IA</p>
1.8 Public information	<p>IA: requirements for standard 8. Information management and public awareness in sub-paragraphs 8.1.-8.6 (Criteria for evaluating information management and public awareness),</p> <p>PA: requirements for standard 7. Information management and public awareness in subparagraphs 7.5-7.10 (Criteria for evaluating information management and public awareness)</p> <p>MedIA: 3.1.1 Medical education organization must define, approve and publish the principles, methods and practices used to assess students 8.1.3 T The medical education organization must ensure the transparency of the management system and decisions made, which are published in bulletins, posted on the website of the university, included in the protocols for review and execution 8.5.3 The medical education organization should publish information about its activities, including the EP, which is clear, accurate, objective, relevant and accessible.</p> <p>MedPA: same as MedIA</p>
1.9 On-going monitoring and periodic review of programmes	<p>IA: requirements for standard 9. Periodic external quality assurance in sub-paragraphs 9.1- 9.7 (Criteria for evaluating periodic external quality assurance),</p> <p>PA: for standard 8. Regular monitoring, periodic evaluation of educational programmes, periodic accreditation in paragraphs 8.1-8.14 (Evaluation criteria for regular monitoring, periodic evaluation of educational programmes, periodic accreditation)</p> <p>MedIA: Standard 7 Evaluation of the educational programme criteria 7.1 Program monitoring and evaluation mechanisms – 7.4 Stakeholder involvement</p> <p>MedPA: same as MedIA</p>
1.10 Cyclical external quality assurance	<p>IA: requirements for standard 9. Cyclical external quality assurance in sub-paragraphs 9.1- 9.7 (Criteria for evaluating cyclical external quality assurance),</p> <p>PA: requirements for standard 8. Regular monitoring, cyclical evaluation of educational programmes, cyclical accreditation in paragraphs 8.1-8.14 (Evaluation criteria for regular monitoring, cyclical evaluation of educational programmes, periodic accreditation)</p>

	MedIA: not included MedPA: not included
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Table 6: Panel Analysis of ESG Part I and IKCA Assessment Criteria

Analysis

As shown in table 6 above, the majority of ESG Part I standards are covered by all four guidelines of IKCA. However, the review panel has identified some shortcomings both, in interpretation of some ESG standards in IKCA guidelines as well as their implementation in the reports.

At the time of the review IKCA had conducted different types of accreditations with positive results (accredited for 5, 3, 1 or 0.5 year) in a total of eight different universities. The following table, drafted based on public information available on IKCA website, shows the names of the universities, the type of accreditation, the accreditation decision made by the Accreditation Council, and the number of experts involved in the accreditation procedure. In the case of programme accreditation, the number of programmes and the number of study disciplines are indicated to describe the diversity of specialties included in one accreditation procedure conducted by an expert panel.

Name of the institution	Institutional accreditation	Programme accreditation
LLP Kyzylorda University "Bolashak"		12.06.2020 14 programmes 8 study disciplines, 13 experts, including 1 student
Eurasian Law Academy named after D.A. Kunaeva		25.04.2021 5 programmes 2 study disciplines, 7 experts, including 1 student
Institution "Humanitarian-Technical Academy"	25.02.2021-24.03.2026 6 experts, including 1 student (the same panel accrediting economics and information systems)	25.04.2021 5 programmes Finance (2 programmes): 4 experts, including 1 student Economics and information systems (3 programmes): 6 experts, incl. student
Non-profit organization-Institution «Peoples Friendship University named after academician A.Kuatbekov»	29.06.2022-28.12.2022 6 experts, incl. 1 student 5 standards out of 8 with observations, faculty with 6 observations - decision by AC - severe shortcomings.	28.06.2022-28.12.2022 12 programmes from 5 study disciplines, no AC decision added, can be found by the IA report 9 experts, including 1 student
Limited Liability Partnership «Kazakh-Russian International university»		29.06.2022-23.02.2023 5 programmes no AC decision added, no reports (page not found)

		3 study disciplines, no of experts - NA
«Almaty Humanitarian-Economic university» institution	20.05.2022-19.05.2025 report not published on the website, no justification of the AC decision either	29.06.2022 3 programmes from 2 study disciplines, 5 experts, incl. 1 student
«Almaty Humanitarian -Economic University»		20.05.2022 15 programmes from 5 study disciplines, 13 experts, including 1 student
Non-profit educational organization «Turan-Astana» university		20.05.2022-19.05.2027 6 programmes from 4 study disciplines 6 experts, including 1 student
Baishev University Institution		30.06.2022 6 programmes from 5 study disciplines 7 experts, including 1 student

Table 7: Institutional and programme accreditations conducted by IKCA in 2019- June 2022

For institutional accreditation one sample report was provided in English to the review panel, the 'Report on institutional accreditation of the Humanitarian and Technical Academy of Kokshetau'. Another sample report in Russian was taken as a source for analysis: 'Peoples Friendship University named after academician A.Kuatbekov and Humanitarian-Technical Academy'.

For programme accreditation, the following reports were considered by the panel, MA programme in pre-school education from Almaty Humanitarian -Economic University, MA programme in HR management from Turan-Astana University' and BA programme in accounting and audit from Baishev University Institution.

The review panel is concerned about the inconsistency between the published standards and the guidelines for self-assessment. Moreover, the reports studied by the panel did not include the same number of standards as described within guidelines for self-assessment and the standards provided to the panel as Annexes to the SAR. In the case of institutional accreditation, the review panel did not see inclusion of ESG I. 9 'Periodic external quality assurance'. In the case of programme accreditation, the evidence was not apparent for ESG I.8 'Regular monitoring, periodic evaluation of educational programmes'. However, as there is some overlap between different standards and criteria, it was possible to find some evidence about the monitoring of programmes in standard 2 and 3.

The review panel would like to commend the agency for the fact that the updated version of standards (2021) includes very clear and detailed criteria. The panel were impressed by the thoroughness of the self-assessment guide, which also contains specific recommendations on what to highlight as evidence for one or another criterion and what should be focused on in the analysis. However, the evidence available from the sample of reports showed that not all criteria were given attention by the expert accreditation panels. Moreover, in some cases, the analysis and recommendations were given in very general terms and the coherence between evidence-analysis-recommendations was lacking. It is obvious that more time and effort is needed for both educational institutions and experts to

understand the content of all standards and criteria in order to apply them in the process of internal and external quality assurance.

After analysing the standards and their implementation in the reports, the review panel reached the following conclusions:

ESG 1.1 Policy for Quality Assurance: The meaning of ESG standard is sufficiently covered in all IKCA standards. However, in reports, the main focus is in assessing the availability of QA documents rather than effectiveness of IQA.

ESG 1.2 Design and approval of programmes: The meaning of ESG standard is sufficiently covered in all IKCA standards. However, the concept of outcome-based programmes is not evident in all reports, even if one of the criteria is asking to see whether “*Educational programs are developed on the basis of a competency-based and modular-credit approach to learning*”.

ESG 1.3 Student-centred learning, teaching and assessment: The meaning of ESG standard is sufficiently covered in all IKCA standards. In general, the standard is well applied in the reports analysed by the panel. Observations made by accreditation panels are addressing mainly a lower-level aspect of academic mobility and the formality of student involvement.

ESG 1.4. Student admission, progression, recognition and certification: The meaning of ESG standard is covered in IKCA standards for IA and PA. In MeIA and MedPA recognition of non-formal and informal prior learning is not elaborated. In the reports the admission, progression and certification of students is sufficiently analysed. However, the recognition of prior learning is often limited to the recognition of academic studies completed at other universities. The criterion 4.5 ‘*The HEI has developed procedures for recognizing informal and non-formal learning outside the educational institutions, including the mobility of students (internal and foreign)*’ is not applied, or is applied in very general terms, e.g., looking for the document regulating the procedure.

ESG 1.5 Teaching staff: The meaning of ESG standard is sufficiently covered in all IKCA standards and applied in the reports. However, while studying the reports, the panel discovered some observations and strengths which were in exactly the same wording in different reports and mostly unrelated to either the evidence or analysis under a specific standard. For example, the strength ‘*The university positions itself as a supporter of innovative approaches to teaching and learning. Together with employers, issues of providing students with internship bases, updating the educational program, internships and employment are being addressed.*’ was presented in several reports under different standards. It is not clear to the review panel as to why this is the case.

ESG 1.6 Learning resources and student support: The meaning of ESG standard is sufficiently covered in all IKCA standards. Moreover, the criteria set in IKCA standards are more demanding, e.g., asking the institutions to ‘assess the dynamics of development of material and technical resources’ or ‘determine the degree of provision of students with methodological materials and information sources’. There are 23 different criteria set in IKCA standard for institutional accreditation 7. Resources and student support services. In two reports analysed by the panel, approximately 50% of the criteria were covered.

ESG 1.7 Information management: According to ESG 1.7 information management is about collecting, analysing and using the relevant information for the management of programmes. This aspect is not present in the criteria IKCA includes in the table (SAR). However, there are criteria under standard 2 ‘Educational programmes’ that show compliance with ESG 1.7: 2.13 and 2.14. Therefore, it can be concluded that the meaning of ESG is covered in IKCA standards (including MEDla

and MedPA). It would seem that there is a problem in understanding the term 'information management', because the IKCA PA Standard 7 Information management and public awareness, and IA Standard 8 Information management and public awareness, do not include any criteria related to information management as outlined within the ESG. However, some of the elements, such as, performance indicators, student progression, learning resources etc. are elaborated in other standards (programmes, students, strategic management), but the main thrust behind the ESG standard - *Effective processes to collect and analyse information about study programmes and other activities feed into the internal quality assurance system* - is not systematically implemented.

ESG 1.8 Public information: The meaning of ESG standard is sufficiently covered in all IKCA standards and applied in the reports.

MedIA and **ESG 1.9 On-going monitoring and periodic review of programmes:** In the case of medical standards MedPA this ESG standard is sufficiently covered. In the case of IA, in table 5 reference is made to IKCA standard which requires the cyclical external QA. The actual reference should be made to the IA standard 2 Educational programmes, criteria 2.10-2.13. In the case of programme accreditation, the reference is made to standard 8, Regular monitoring, periodic evaluation of educational programmes, periodic accreditation in paragraphs 8.1-8.14. However, in the reports on programme accreditation analysed by the panel, standard 8 (including 14 criteria) is not included. Although the regular development process of programmes is partially evident under standard 2 Development and approval of programmes, it is not justified in any way as to why the standard which is dealing with on-going monitoring and periodic review of programmes is not reflected in the reports, although the standards were updated in 2021. The understanding of the periodic review of programmes as a holistic process including evaluation of the content of the programme in the light of the latest research; changing needs of society; students' workload, progression and completion; effectiveness of procedures for assessment of students; student expectations, needs and satisfaction in relation to the programme; learning environment and support services and their fitness for purpose - is lacking in most of the reports and the involvement of students and other stakeholders is not assessed.

1.10 Cyclical external quality assurance: Covered by IA and PA standards. The respective IKCA standards were not included in the reports, but due to the system of post-accreditation the requirement for cyclical external QA is met by IKCA.

Panel commendations

1. The review panel commends IKCA on the development of comprehensive and useful guidelines for self-assessment for institutions.

Panel recommendations

1. The review panel recommends that IKCA align the standards published on the agency's website with the self-assessment guidelines.
2. The review panel recommends that IKCA take proactive measures and implement a process to ensure the accreditation reports follow the standards and criteria set out in the respective documents.
3. The review panel recommends that IKCA increase its emphasis on enhancing the understanding of the full meaning of ESG part I, ensuring the implementation of ESG Part I,

focussing on the effectiveness of IQA rather than the availability of IQA, and addressing in particular ESG:

(1.2) - addressing the concept of outcome-based programmes in a more consistent way;

(1.4.) - including the recognition of non-formal and informal prior learning next to the recognition of academic studies;

(1.7) - rethinking the concept of information management and applying it as a complex tool for the development of IQA system;

(1.9) - addressing the periodic review of programmes in a more holistic way, taking into account all relevant aspects and involving students and other stakeholders.

Panel suggestions for further improvement

1. The review panel suggests that as currently there is a significant difference between the two sets of standards for programme accreditation medical programmes and non-medical programmes, IKCA better align the two sets of standards in order to reduce the additional workload for experts and institutions caused by the different structure of similar criteria.
2. The review panel suggests that as currently the standards for accreditations of medical institutions and medical programmes are the same, IKCA use the standards for programme accreditation and develop a new set of standards for accreditation of medical institutions based on the standards for institutional accreditation of higher education institutions.
3. The review panel suggests that IKCA undertake a series of workshops and capacity building discussions with the agency's employees, experts and members of the Accreditation Council in order to establish a better common understanding of the content and consistent implementation of the standards and criteria.
4. The review panel suggests that IKCA encourage the experts to provide more recommendations for improvement to strengthen the internal quality assurance of educational institutions.

Panel conclusion: partially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

Evidence

The first versions of institutional and programme accreditation processes developed by IKCA are from 2018. In 2021 the initial versions were updated to better assure the compliance with ESG and the standards for accreditation of medical institutions and medical programmes were developed taking into account the standards set by the World Federation of Medical Education.

The methodologies of the EQA processes are presented in two types of documents: i) Standards (e.g., Standards of the institutional accreditation of higher education institutions and Standards for specialised accreditation of higher education institutions) and ii) Regulation on the post-accreditation monitoring procedure. As mentioned in ESG 2.1. above, the standards on the website of the agency

do not include all criteria presented in the guidelines for self-assessment and the and the respective documents provided to the review panel. On the Russian website of IKCA there is a comment in brackets added to the names of the standards - „сокращенная версия“, meaning ‘shortened version’.

The information on the website (Register of decisions and reports) shows that IKCA usually combines accreditation of programmes from different study disciplines by a large panel which is sometimes combined also with the accreditation of the whole institution (institutional accreditation). For example, in 2022 in Baishev University Institution, 6 programmes from 5 different study disciplines (Law, Transport, Design, Accounting and Audit, Mining) were accredited by the panel consisting of 7 experts, including one student and the representative of the labour market from the sector of production of building materials (see table 7 above for additional information). None of the current regulations describe the principles and conditions under which such combined assessments are conducted.

The guidelines for the compilation of the self-assessment report are very complex and detailed and include a lot of suggestions for the institutions on how to show the compliance with standards.

A systematic follow-up (post-accreditation monitoring) is carried out after the accreditation. It is applied to all types of IKCA accreditation activities, and it is included from the start of the procedure in the contract established with the HEI.

According to the SAR the process of developing regulations and procedures for external quality assurance involves discussions with external working groups through seminars and conferences, with representatives of higher education institutions and members of the agency’s expert councils. Documents and regulations on the procedures for external quality assurance of the IKCA are developed by the agency’s employees and discussed in working groups at seminars and conferences held with the participation of representatives of educational institutions represented by rectors, vice-rectors, deans, heads of departments, heads of structural units dealing with accreditation issues, expert assessments are given by members of the Expert Council of the IKCA. The SAR includes specific information on a seminar conducted in 2019 ‘Accreditation: criteria, procedure, review methodology – international and national approaches’ during which the agency discussed a number of documents with working groups, namely:

- ‘Requirements for remote review on the self-assessment report of the university/educational programme’,
- ‘Principles of external evaluation and writing a review report’ and,
- ‘the IKCA requirements for review in accordance with ESG’.

The SAR also confirms that feedback from universities and experts were considered in the development of IKCA standards and criteria for institutional and specialised accreditation. Stakeholders interviewed by the panel during the site visit confirmed that they had been consulted and asked for feedback and opinions. However, they were not directly involved in the development process and had not given any proposals or recommendations to improve the EQA methodology of IKCA. The development of EQA methodology, including the principles and procedures of stakeholder involvement, are not described in the self-analysis report or in any other document provided to the panel. As stated in the ‘Guideline for quality assurance of the Independent Kazakhstan Center of Accreditation’ (2022) clause 8.6: ‘Accreditation Standards and Guidelines for institutional and specialized accreditation are developed by employees of the Department of Methodology, Monitoring and Quality Assurance, checked by members of the Expert Council of the IKCA, analyzed and approved by the Supervisory and Accreditation Councils, reviewed by competent representatives of educational organizations, approved and put into effect by order of the director of the IKCA.’

Analysis

The review panel found limited evidence within the SAR with regards to stakeholder involvement in the development, monitoring and internal quality assurance of EQA processes. Systematic processes for involving stakeholders in both design and continuous improvement processes were not evident to the review panel. The review panel did not see evidence of how consultations are undertaken or feedback from external stakeholders is documented and responded to within the agency. The review panel did not see evidence of student involvement or mechanisms for consultation with students as an external stakeholder. During interviews with a range of stakeholders and with agency staff over the course of the on-site visit, the panel were unable to ascertain any specific changes or improvements made resulting from stakeholder feedback, as outlined above (ESG 3.6).

As regards the combination of programmes from different study disciplines in one accreditation procedure, the review panel acknowledges that it appears to be resource efficient and reasonable from the perspective of the higher education institution to conduct self-analysis and to receive feedback on several study programmes from different study disciplines at the same time. However, the accreditation of study programmes from different disciplines by one accreditation panel where specific competence related to the individual programmes is represented by a single expert, reduces the possibility of added value driven from the accreditation procedure and undermines the effectiveness of the accreditation process at the programme level. The panel understands that IKCA is still looking for the EQA methodology which would be fit for purpose in the local higher education context. It is more important to develop clear principles and procedures in cooperation with all relevant stakeholders to ensure a thoughtful balance between efficiency and effectiveness.

The panel are concerned about the inconsistency on the agency's website regarding the EQA regulations: very comprehensive and detailed guidelines for self-assessment along with the standards in 'shortened versions', not including reference to regulation on post-accreditation monitoring as mandatory part of the methodology.

Panel recommendations

1. The review panel recommends that IKCA establish more formal and systematic processes for involvement of external stakeholders in the development of and continuous improvement of EQA methodologies.
2. The review panel recommends that IKCA develop a policy on consultation and explore mechanisms to broaden and enhance its consultation processes.
3. The review panel recommends that IKCA establish clear rules and procedures for combining several study disciplines in one programme accreditation procedure to assure fitness for purpose and support the institution to improve the quality of programmes.

Panel suggestions for further improvement

1. The review panel suggests that IKCA publish a complete and comprehensive methodology document on the agency's website, which should include a full version of standards and criteria.

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

Evidence

The approach to external quality assurance processes, which includes specialised accreditation (programmes) and institutional accreditation, for IKCA is outlined in the SAR and described in section 8 of the agency's quality assurance guidelines. As outlined previously, according to the Law of the Republic of Kazakhstan, accreditation is carried out on a voluntary basis by institutions.

The guidelines for quality assurance outline the main elements of the external accreditation process, these are summarised below:

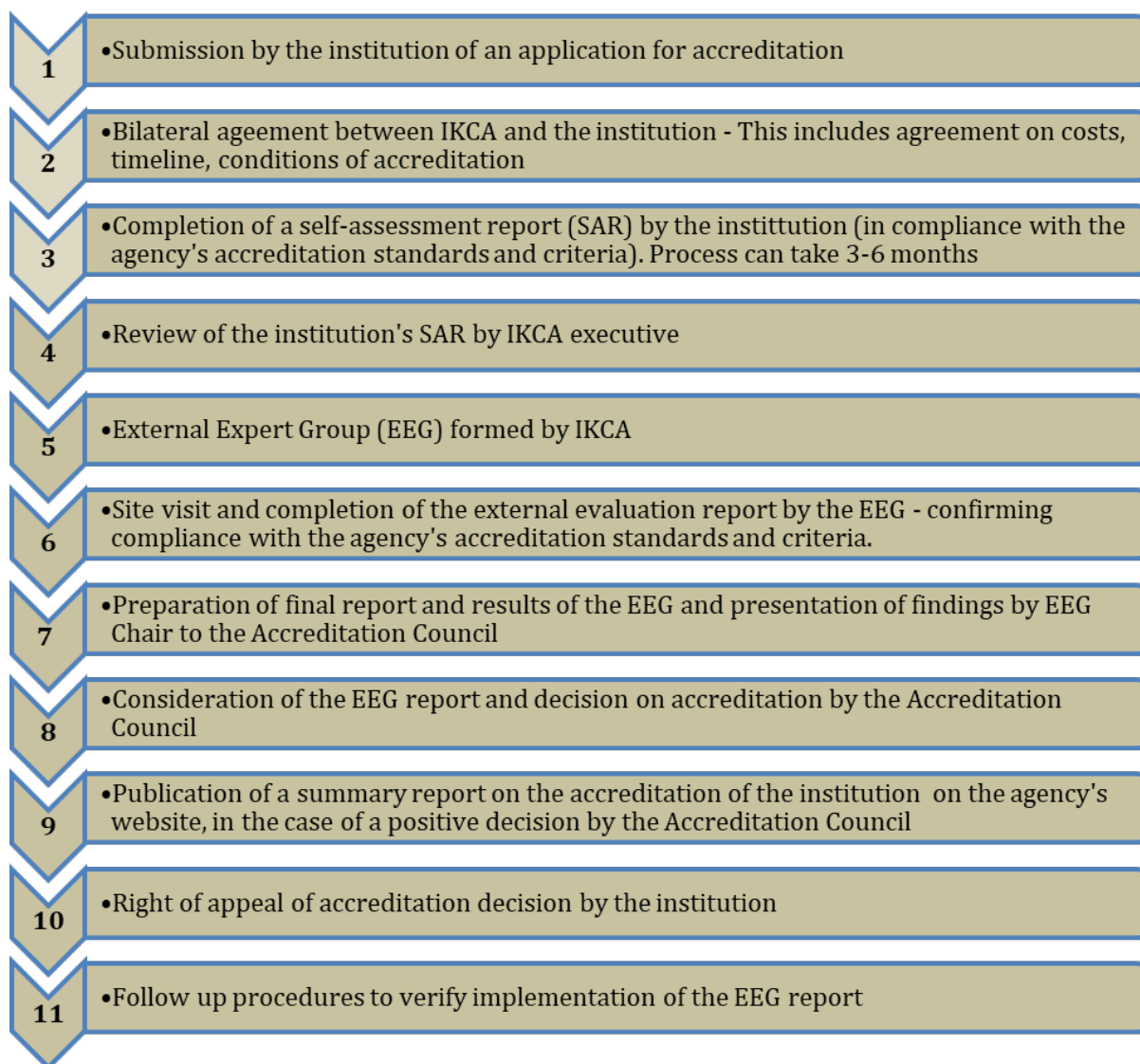


Table 8: External accreditation process

The accreditation standards and criteria are not contained within the guidelines for quality assurance but are published separately and are available on the IKCA website. According to the SAR, on signing of the bilateral agreement between the institution and IKCA, the agency's executive conducts training workshops for the steering committee and staff of the institution on the agency's accreditation standards and criteria, technology and methodology for the self-assessment, and accreditation process. Within its own SAR the agency outlines the training and support provided to institutions in the process and methodology for preparation of the institution's self-assessment report, and the emphasis placed on the importance of self-reflection and critical analysis in the process, to contribute to development and enhancement of quality within institutions.

Despite the training and support provided in advance to the institutions, IKCA acknowledges within the SAR that not all institutional self-assessment reports are completed in full or accepted the first time. Indeed, the SAR notes that several revisions are usually needed to the institutions' self-assessment reports, and the agency acknowledges that institutions' management do not attach sufficient importance or value to the self-assessment process, and the self-assessment process is not used as a meaningful reflective process to identify and inform corrective actions and to contribute to quality improvements. The agency recognises and identifies this as an area on which it needs to improve (SAR p.46).

Decisions on Accreditation

The final decision on institutional and programme accreditation is made by the Accreditation Council, based on an analysis of compliance with the criteria in the self-assessment and EEG report, within the context of the institution (see ESG 2.5).

The post accreditation follow-up procedures and actions of IKCA are based on the principle that the responsibility for addressing the recommendations and findings of the external report is with the institutions themselves. IKCA operates the following follow-up procedures, in the case of:

- i. *Full accreditation for a period of 5 years* - the university is required to provide a report every 2 years on QA improvements and changes that have taken place in the internal quality assurance system.
- ii. *Conditional accreditation* (incomplete accreditation for 1 or 3 years) – as outlined above, verification that all conditions are addressed, within an agreed timeline.

The review panel notes that reports on positive accreditation decisions are published, reports on decisions on non-accreditation are not currently published. In the event of non-submission of a follow up report, the IKCA has the right to decide on cancellation or suspension of the certificate of accreditation, the educational institution has the right to appeal this decision.

At any stage in the process the institution or other individual has the right to make a complaint to IKCA through the agency's complaints procedure. The complaints and appeals procedures are considered further in ESG 2.7 below.

Analysis

Following its analysis of the information within the SAR, of published review reports and its interviews with agency staff, experts and institution representatives, the review panel is satisfied that IKCA has a predetermined, documented accreditation process, and that all phases of the processes and the decisions are understood and implemented. The process is published and available.

The review panel confirmed the decision-making progress during its meeting with representatives of the Accreditation Council, who confirmed the reports are divided between members by the Chair, a preparatory desk review is undertaken by members, and the reports are verbally presented by the Chair of the experts group. The Council considers a maximum of 8/9 max reports at its meeting and reaches its decision on each standard by consensus. The Council confirmed they have had situations arising when they sent the report back to the expert group for further information. During its discussion with the Accreditation Council representatives the review panel queried a decision made by the Council to accredit an institution for 6 months – which is not an outcome of the process in the agency's regulations. The Council representatives confirmed this was an exceptional decision made in the interests of students, to allow students to graduate from the institution.

However, the review panel found the outcomes of the process within the published accreditation reports difficult to follow, as they do not all correlate directly to the accreditation standards. There are different terms used for the standards in different reports, and it is not always clear from the external experts report as to how the expert panel arrived at its conclusions. The supporting analysis from the experts' report is, in the opinion of the review panel, very limited. It was difficult to ascertain consistency across the reports, or how this is quality assured within the agency. During discussions with IKCA staff, staff confirmed that they have templates which are used and there are common

requirements which are applied for the reports, and reports are checked to ensure consistency with these templates. This was not evident to the review panel in the published reports.

During the site visit the review panel confirmed that students are included on the expert group and the student representatives the panel met with were all very positive about their experience and felt supported by the agency in the process.

Panel commendation

1. The review panel commends IKCA for a clearly documented external accreditation process consistent with international practice.

Panel recommendations

1. The review panel recommends that IKCA ensure the full implementation of internal processes and templates to achieve consistency in implementation of the standards and criteria in its external evaluation reports from expert panels.
2. The review panel recommends that IKCA consistently ensure that the composition of an expert group allows the group to provide meaningful feedback to all programmes under accreditation.

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).

Evidence

IKCA involves a wide range of experts from different perspectives who contribute to the work of the agency. The agency ensures the independence of the experts by implementing a mechanism to confirm there is no conflict of interest. The external expert groups for institutional and programme accreditations, including for medical accreditation, include academic experts, representatives of the labour market/profession, and student and international experts are obligatory members of the expert groups. The 'Code of Honour' for experts establishes a code of conduct and standard of behaviour expected of all experts. Participation in training and signing the code of honour is mandatory for all experts. As outlined in the SAR and confirmed by the review panel during the visit, the institutions are advised of the proposed expert panel in advance to ensure there are no conflicts of interest arising. IKCA conducts training seminars and webinars for experts, on the accreditation procedure, the methodology for conducting a review, and introducing the code of honour. Participation in the training is mandatory for all experts.

IKCA maintains a database of its experts, and feedback on individual experts from the institutions and/or the IKCA coordinator for the review are noted on the database and considered by agency staff when forming external expert groups. The SAR states that the database has over 800 experts, with

122 employers and 120 students. However, during the site visit, the complete excel file list of experts made available to the review panel included 526 experts, only 7 of which are students and 7 are employers.

According to the SAR, there are approximately 30 international experts from 12 countries, the review panel was unable to confirm this from the list, it would seem to the panel from the evidence that international experts are in the main from Kyrgyz and Uzbekistan.

For the expert groups used for IKCA's combined accreditation approach, the review panel notes that these groups can have up to 12 members, with only one student representative. This seems to the review panel to be somewhat contradictory to the agency's own guidelines, for conducting external evaluations, which state, 'The composition of the EEG is formed for each accredited OEP, taking into account the areas of activity and educational services provided from among certified representatives of the academic, professional and student community in accordance with the Regulation on the external expert group of the IKCA' (clause 2.2).

Analysis

The panel confirmed during the site visit the different processes, such as the 'Code of Honour' and training for experts that have been put in place by IKCA to ensure the integrity of its external expert groups. The review panel also positively recognises the diversity of the expert groups which include a student member as standard. In its discussions with a number of student experts, the review panel found that the students were enthusiastic and positive about their experience, they commented on how they felt supported by the agency and were treated as equal members of the expert groups.

The review panel confirmed that the expert groups are convened by agency staff (the accreditation coordinator), agreed with their unit director, and approved by the agency director. The agency staff confirmed to the review panel that the criteria used to identify experts is the profile of the programme/curriculum to be evaluated. It was not clear to the review panel as to what additional criteria is applied for institutional accreditation, or what criteria is applied for inclusion on the agency's database, the review panel were unable to identify any predefined transparent criteria or guidelines. Though the review panel acknowledges training undertaken for experts, the panel believes this is an area for further ongoing development, in particular with regards to the quality of accreditation reports and understanding of ESG Part I (see ESG 2.1 above).

In relation to international experts, the review panel acknowledges and commends the agency on inclusion of international experts on all external expert groups. However, in practice the pool of countries from which the experts are selected is narrow. The review panel acknowledges the challenges in using external experts, in particular those that do not speak Kazakh or Russian. However, the panel considers it would be beneficial to the enhancement of the agency's process and to the quality enhancement of institutions to broaden inclusion of international experts with quality assurance expertise in the implementation of the ESG. With regards to inclusion of student experts on expert groups for combined accreditations, it would seem to the review panel that students are not sufficiently represented. The review panel saw composition of some expert groups with 12 members, only one of which was a student, which is not an equitable representation.

Panel commendations

1. The review panel commends IKCA on establishing its experts' database.
2. The review panel commends IKCA on the inclusion of international experts on the external expert panels.

3. The review panel commends IKCA on the inclusion of students as equal and respected members in the expert groups.

Panel recommendations

1. The review panel recommends that IKCA establish transparent guidelines and criteria for the compilation of expert groups and the appointment of experts.
2. The review panel recommends that IKCA implement a comprehensive training programme for experts the effectiveness of which is periodically monitored and improved on.

Panel suggestions for further improvement

1. The review panel suggests that where feasible, IKCA broaden its countries pool of international experts, to ensure it is engaging experts from the European Higher Education Area.
2. The review panel suggests that IKCA consider the equitable representation of students on larger panels and endeavours to ensure that each study discipline shall be evaluated with the involvement of a sufficient number of student experts.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

Each standard in the IKCA regulations for institutional and programme accreditation as well as for accreditation of medical institutions and programmes contain a considerable number of criteria which are all fully published on the website under the subsection 'Standards' (see also ESG 2.2). A full list of criteria is listed in the guidelines for compilation of the self-assessment reports. The panel received the versions of standards which included all criteria.

According to the IKCA regulations (e.g., Standards for institutional accreditation) the expert groups are asked to prepare a report that includes an analysis of the situation, good practices, and recommendations for further improvement.

Specific tasks of the expert group and the criteria for the assessment of standards are set out in the document 'Guidelines for organizing and conducting external evaluation (audit) as part of the accreditation of educational organizations' (2020), provided to the panel. The document is not available on IKCA website. According to the guidelines the expert group shall assess the standards (and criteria) as follows:

- 'Strong'
- 'Satisfactory'
- 'Suggests improvement'

- 'Unsatisfactory'.

However, the review panel was unable to find any report where assessments of compliance with the standards were presented in this form. In some reports, only 'remarks' and 'recommendations' were provided, in other reports also conclusions were: 'complies' (in case there were no remarks), 'complies with remarks' and 'does not comply'. The meaning of the term 'remark' in the context of the IKCA reports is 'non-compliance with some criteria'. The term 'recommendation' is used as 'suggestion for further improvement'.

In all the reports read by the review panel, the rating for the standard was 'complies with remarks' whenever at least one 'remark' (observation) was provided under the standard, regardless of how many criteria were listed under the standard or how many comments the panel made. As described above (ESG 2.1), there is a remarkable list of criteria under each accreditation standard. However, the criteria are not separately addressed in the reports, the assessment is given to the standard as a whole.

The decision by the Accreditation Council is made on the basis of the self-assessment report of the educational organisation and the final report of the external expert group. The conclusion of the accreditation body is based on the analysis of the documents presented above.

According to the regulation, the accreditation decision by the AC can be one of the following:

- accredit for 5 years, if a decision is made 'Complies' for all standards, or 'Complies with remarks' up to 3 standards.
- accredit for 3 years, if a decision is made 'Complies with comments' according to 4 standards.
- accredit for 1 year, if a decision is made 'Complies with comments' for 5 or more standards.
- refuse accreditation, if one of the standards has received the mark 'Does not comply'.

According to the SAR (p.49) IKCA implements several steps within its processes to ensure consistency of evaluation and outcomes. The internal quality assurance guidelines, the standards for programme and institutional accreditation, and the regulations of the Accreditation Council are all key documents which underpin consistency of approach within the external quality assurance processes. As outlined in the SAR, IKCA implements a number of interrelated and consequent activities. Guidelines are also made available, including templates for preparing the external report, and training provided to external experts (see ESG 2.4). The process of formulating remarks, identifying best practice and arriving at the recommended decision is addressed in the experts training. The review panel also confirmed the training received by experts during its meeting with experts' representatives (see ESG 2.4).

The regulations for the Accreditation Council outline the accreditation decision making process of the Council. The formal decisions of the Accreditation Council are outlined above, and this was confirmed with representatives of the Council during the site visit.

Despite the efforts made by IKCA, the review panel observed several deviations from the established criteria for outcomes when it comes to the accreditation decisions by the Accreditation Council (AC). For example:

- Almaty Humanitarian-Economic University: Pedagogy and Methodology of Elementary Education had 3 standards with 'non-compliance', but AC decided to accredit the programme for 1 year.
- Humanitarian-Technical University: BA programme Information Systems got for 6 standards, 'complies with remarks' but was accredited for 5 years.
- Peoples Friendship University named after academician A. Kuatbekov: In the report on institutional accreditation 5 standards were assessed as 'complies with remarks' and 3 with 'complies', but the institution was accredited for 0.5 years.

The decisions of the Accreditation Council do not include any justification nor provide clarifications as to why in one or another case the council has not followed the established criteria for decision making.

As described above, post-accreditation monitoring is a mandatory part of the EQA methodology and may make an impact on the initial accreditation decision of an institution or programme. 'The regulation on the post-accreditation monitoring procedure of the educational organisations and/or educational programmes establishes the obligation to submit an interim report after a certain period'. According to clause 2.9 IKCA has the right to decide to cancel or suspend the certificate of accreditation, if the institution has not submitted the interim report. In the case of 'non-fulfilment' of the recommendations provided by the external expert panel in the report, IKCA has the right to temporarily suspend the certificate of accreditation or revoke the certificate of accreditation and exclude the institution or the programme from the National Register. On the other hand, as a result of the post-accreditation monitoring, the initial accreditation for 3 or 1 years can be extended to 5 years. Thus, post-accreditation monitoring is a powerful tool which allows both the withdrawal of the accreditation as well as the extension of its validity. However, the main documents regulating the accreditation of institutions and programmes (standards for institutional and specialised accreditation) do not describe the role of post-accreditation monitoring in the accreditation procedure and the decision-making process is not included in the 'Regulation on the Accreditation Council of the Independent Kazakhstan Center of Accreditation' either.

Analysis

The criteria for outcomes are published on IKCA website in the respective regulations. However, the regulations do not include the criteria for assessment of standards in the accreditation reports. Since the Council's decisions are based on how the expert group evaluates compliance with the standard, the panel concludes that criteria for outcomes are not fully available to the public.

All experts are trained and well supported by the agency, but there is still inconsistency in addressing every single criterion in the report. Therefore, the evidence and analysis provided in different reports often address slightly different topics and focus on different aspects which ultimately leads to the fact that the assessments of compliance with the standards in different reports are not consistent.

The review panel is concerned about the lack of consistency in the decisions made by the Accreditation Council. Moreover, it seems that the Accreditation Council does not follow the criteria for outcomes set in the regulations. The reason may be that the council has not been given enough discretion while making decisions. Nevertheless, if such decision-making principles are established, the council must follow them or make proposals for amendments. The panel considers that it is unacceptable if the decision-making body violates the established rules without documented rationale for deviation on specific decisions. During the site visit the panel got an understanding that IKCA staff do not interfere in the decision-making process of the Accreditation Council as the council must be independent. The panel also notes that the director of the agency also belongs to the council, which is not a common practice in the European Higher Education Area and should be avoided, as it gives to the director direct access to the decision-making process through his membership of the council.

The panel did not find clear criteria for decision making based on the results of post-accreditation monitoring. The regulation on the post-accreditation monitoring procedure of the educational organisations and/or educational programmes is not clear about the role of IKCA and Accreditation Council and External Expert Group in this regard. The Accreditation Council is asked to discuss the interim reports and decide the possible extension of the accreditation period in those cases where the accreditation decision has been 3 or 1 years. According to clause 4.2. of the *Regulation on the post-*

accreditation monitoring procedure of the educational organizations and / or educational programs the Accreditation Council may 'consider the possibility of extending the accreditation period'. However, the document does not include any criteria for making extension decisions.

In other cases (institutions or programmes accredited for 5 years), the role of the Accreditation Council in the process of post-accreditation monitoring is not explicit. Clauses 4.3-4.7 of the regulation describe in which cases IKCA may revoke the accreditation decision or grant additional time for the elimination of shortcomings. Based on the regulation, IKCA has the mandate to revoke the accreditation, for example, if the higher education institution does not submit a report on improvement activities or does not sign a post-accreditation agreement. Clause 4.4. says that IKCA may give to the higher education institution additional time to eliminate deficiencies, if the post-accreditation monitoring report reveals that the higher education institution has not fully considered the recommendations of the External Expert Committee. Clause 4.5. gives IKCA the right to "temporarily suspend" the accreditation certificate if the higher education institution has not sufficiently considered the recommendations of the EEC, as well as to withdraw the accreditation certificate. Thus, based on the regulation, it is possible that the 5-year accreditation will be revoked by IKCA without the involvement of the Accreditation Council. The main problem from the perspective of the review panel, is that the right to revoke accreditation must remain within the competence of the Accreditation Council only.

The review panel is aware that this approach has not been practiced yet. Accreditation has been revoked only in cases where the institution has not submitted an interim report, and since this obligation and the consequences of its violation are written in the agreement between IKCA and the higher education institution, it does not require the intervention of the Accreditation Council. Therefore, it is important to supplement the regulation on post-accreditation monitoring as soon as possible and clearly document down the powers of the IKCA office and the Accreditation Council, the process of processing the interim report and the principles of adopting the decision of the Accreditation Council in all those cases where the higher education institution has submitted an interim report. Moreover, post-accreditation monitoring as a mandatory part of the accreditation procedure should be included in the main regulatory documents - standards for institutional and programme accreditation.

It is the view of the review panel that the section in the SAR concerning this ESG standard was very weak and did not contain sufficient and relevant information on the methods the agency is using to assure the consistency of outcomes. During the site visit interviews with staff, experts and council members, the review panel are of the view that there is limited understanding of what is meant by 'consistency' and of the need for consistency in decision making processes.

Panel recommendations

1. The review panel recommends that IKCA review the regulations on accreditation, including standards for institutional and programme accreditation as well as standards for accreditation of medical institutions and programmes, to ensure clear criteria for decisions at all levels, from the assessment criteria expert reports and to the criteria for decisions as result of post-accreditation monitoring, so that all parties involved have an overview of the assessment criteria applied throughout the entire process.
2. The review panel recommends that IKCA implement proactive measures to develop understanding and capacity of staff members, experts and members of the Accreditation Council, on the need for consistency and methodologies to ensure consistency of decisions.

3. The review panel recommends that IKCA implement measures to support the Accreditation Council in following the criteria for decisions set in the regulations and published and ensure that any deviation from the rules should be thoroughly justified and made available for the public as part of the accreditation decision.
4. The review panel recommends that IKCA formalise and publish all decisions on withdrawal of accreditation, to include an accreditation report and initial accreditation decision.
5. The review panel recommends that IKCA ensure that the withdrawal of the accreditation decision as a result of the post-accreditation monitoring stays within the sole competence of the Accreditation Council.

Panel suggestions for further improvement

1. The review panel suggests that IKCA broaden the decision-making options of the Accreditation Council, this may include giving the council the opportunity to i) send the report back to the expert group if the assessments are not sufficiently justified or if all aspects are not sufficiently analysed in the report, ii) to exercise discretion, if in the expert group's opinion 1-4 standards are partly met, and iii) exercise discretion if all standards are partially met and decide whether to accredit for 1 year or not to accredit.
2. The review panel suggests that the grounds for withdrawal of accreditation should be clearly documented in the agreement with the institutions.

Panel conclusion: non-compliant

ESG 2.6 REPORTING

Standard:

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

Evidence

According to the SAR IKCA has developed templates for the external evaluation report, and procedures and guidelines for experts in drafting their report on the external accreditation process. The template which is designed to demonstrate compliance with the standards and criteria of IKCA is provided to experts in advance of the external accreditation visit. As outlined in the SAR, the structure of the external evaluation report includes the following:

- context and objectives of the site visit,
- a summary of the main characteristics of the institution,
- assessments of each standard with analysis and description of achievements,
- analysis of evidence,
- evaluation of good practices,
- comments and recommendations, and necessary improvements.

On completion, a draft of the report of the findings of the external evaluation panel is provided to the institution to check for factual and technical accuracy. Following any necessary corrections, the IKCA external evaluation coordinator and external panel chair finalise the report for presentation to the

Accreditation Council for the decision on accreditation. According to the SAR (p.51) all reports on external evaluation and accreditation activities are published on the agency's website, and follow-up action plans by the institutions are published on the institution's own website.

Some examples of accreditation reports were provided to the panel in English as part of the additional documentation requested, however the institutional accreditation report was for an institution of technical and vocational education which is outside the scope of this review. During the site visit the panel were able to review some reports and decisions of the Accreditation Council on the agency's newly developed database of accredited institutions and programmes on the agency website <http://www.nkca.kz>.

During the site visit, the panel noted that not all reports were available on the database, and the review panel was advised this was due to a technical error in uploading the reports. Some of these discrepancies were corrected during the visit, though some discrepancies remained, reports on positive decisions of the Accreditation Council on programme accreditation were seen by the panel. The review panel also learned that currently reports of negative decisions of accreditation are not published, and in the event of accreditation being withdrawn due to non-compliance by an institution with IKCA regulations, previously published reports are removed from the website. Withdrawal of accreditation is a condition of post accreditation monitoring, during the site visit, the review panel were unable to ascertain any formal process for withdrawal of accreditation, and it was confirmed that on withdrawal, accreditation reports were taken-down from the website.

As part of the agency's post accreditation follow-up, the SAR states that institutions must submit an action plan addressing the comments and recommendations of the external evaluation report. This is submitted to IKCA and posted on the institution's own website. A sample of an action plan was submitted to the review panel as part of the additional documentation requested, the report provided related to a TVET institution, which is outside the scope of the review.

Though a template and training are provided to experts, within the SAR, the agency identified issues with the quality and consistency of reports from experts, noting that some experts find it difficult to articulate comments and recommendations in accordance with the agency's criteria and regulations. IKCA continues to work on improving its training and support for external expert panels in report writing.

During the review panel's discussions with the experts over the course of the site visit the experts confirmed their use and application of IKCA's standards as the minimal criteria for evaluation but stated they would welcome and look forward to richer evidence and deeper methodologies to evaluate and consider continual improvement processes in institutions.

Also, in the meeting with experts, the review panel discussed the approach and challenges in evaluating ESG part I, with a focus on ESG 1.3 Student-centred Learning, Teaching and Assessment. The evaluation of ESG part I is not explicitly evident in the reports (ESG 2.1). Experts advised that during the evaluation process, the experts consider the programme discipline and speciality, the teaching methodologies and the abilities and needs of the students, the process of student learning, as well as the services available for students. Student feedback is also considered. Experts endeavour to use objective measures for accreditation and reflect this in their report.

Analysis

The review panel found some of the published reports confusing and identified a number of inconsistencies across the reports, for example, different outcomes are used in the evaluation criteria, some reports note the outcomes as 'satisfactory' or 'unsatisfactory' and others as 'compliant' or 'non-compliant', and there is a lack of consistency of the reports in terms of detail and analysis. Some reports do not provide any analysis or assessment of the standards, but include a statement, 'no

comment’, in the main the reports do not identify good practice. It was also not clear to the panel as to the distinction in reports between ‘comment’ and ‘recommendation’ (see ESG 2.5 above).

It is the review panel’s view that consistency of terminology and approach and ensuring elements of good practice and strengths as well as areas for improvement, are articulated within the accreditation reports is an area that needs to be addressed for improvement. In this regard, the review panel concurs with the agency’s self-analysis within the SAR.

The review panel recognises the creation of the agency’s database and register of accredited programmes and institutions as a positive development in providing ease of access to published reports, and transparency in the publication of the decisions of the Accreditation Council. The review panel reviewed the database during the site visit and noted that not all reports were published. The panel was advised this was a technical error with the database. However, in the process of compiling its report, the review panel further reviewed the database, and unfortunately confirmed that at the time of writing its report, it remains the case that not all accreditation reports are available and published.

During the site visit the review panel learned that reports on negative decisions of the accreditation council are not published, where an institution or programme is not accredited, the report and decision is not published. Further, during the site visit the review panel learned of two institutions for which reports had been previously published, but which had since been removed from the website as accreditation had been withdrawn, see table 7 above. The review panel was advised there was no formal or transparent process for withdrawal of accreditation, the reports are simply removed from the agency’s website. The withdrawal of accreditation and the decision and notification of withdrawal is not published, it simply becomes the case the institutions no longer appear. All reports including negative accreditation decisions of the Accreditation Council should be published.

Panel recommendations

1. The review panel recommends that IKCA publish all accreditation decisions and reports, both positive and negative decisions, and correct all discrepancies with regards to missing reports on the agency’s database.
2. The review panel recommends that IKCA establish a transparent process for the formal withdrawal of accreditation from an institution and removal of an institution from the IKCA register.

Panel conclusion: non-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 describes the workings of the complaints commission and of the appeals commission (pp. 21-24, pp. 52-53). However, the SAR did not clarify the composition of the commissions or how the

institutions are informed about the process for filing a complaint or making an appeal. The review panel considered regulations of the complaints commission and the regulations for the appeal commission. The appointing process of the commissions, and the approval of their regulations, is dealt with in the agency's charter, article 3. As the information in the SAR was limited, the review panel requested further information on the specific composition of the commissions and information on the permanent members of the commissions were made available to the panel. During the site visit, the panel met with the chair and deputy chair of both commissions, with representatives of the HEIs, and staff of the accreditation department, during which this topic was discussed.

Analysis

The procedure for filing complaints is specified in the regulation of the complaints commission, this regulation is published on the website of the agency, though the review panel considers it was difficult to locate and not easy to find. The stakeholders confirmed to the panel at its meetings during the onsite visit that they were aware of the possibility of making a complaint and that they were informed about the process at the first meeting with the agency and in the bilateral agreement for the accreditation. They were aware that only complaints written on headed paper and addressed by snail mail to the director of the agency are considered. Once the director receives a complaint, it is then passed to the complaints commission. The review panel confirmed that the commission is made up of two permanent members, the chairman and deputy chairman, and three temporary members drawn from 'highly qualified representatives of production, employers, and other educational organizations according to the profile of the organization that filed a complaint' (Regulations, Article 2). The members of the commission are appointed by the director of the agency (agency charter). It is not clear to the review panel as to who approves the regulation of the complaint commission, because the agency charter states that the responsibility of the Supervisory Board is 'consideration and approval of regulations on the Complaints Commission of the Center...and...the Appeals Commission', whereas, also stated in the charter as responsibility of the Accreditation Commission is the 'consideration and approval of the regulations on the procedure for the examination of complaints and on the Commission for the examination of complaints' [sic]. The review panel acknowledges that this confusion may arise because of issues in translation, but the question remains that since the procedure for complaints is an integral part of the regulation of the complaint commission (and it is not published separately), who approves what is not clear to the review panel.

The review panel understands that the commission requisitions the relevant written materials from IKCA, the complaining HEI, and the EEG, it then takes up to 30 days to evaluate the complaint and reach a decision, and it can reject or accept the complaint, by majority, and on a factual basis, and it returns its decision to the director of IKCA, who within ten days notifies the institution about the outcome of the complaint. The regulations do not state what happens next, in the case of a complaint being accepted.

A similar procedure is followed for filing appeals to accreditation decisions. The relevant regulation and procedure are published on the website of the agency. During the site visit, the HEI representatives interviewed by the review panel confirmed that they were informed from the beginning of the procedure that they could file appeals and advised on how to do it. The composition of the appeal commission has the same structure of that of the complaint commission. The review panel notes the same confusion in the charter with regards to who approves the regulations and procedures for complaints. The only main difference between the complaint's procedure, and the appeals procedure (Regulation of the Appeal Commission, Article 6) is that appeals must be filed by the HEI within ten

days upon receiving the written notification of the accreditation decision by IKCA. The practical means for presenting appeals is the same as for complaints, this is on headed paper, mailed to the director of the agency. The procedure for evaluating the appeals is also similar to that for complaints. The commission requisitions all the available materials, factually evaluates the appeal against the decision by the Accreditation Council, and rejects or accepts the appeal by majority, within 30 days from receiving it. Its decision is forwarded to the director of the agency, who notifies it to the appealing HEI. The regulation does not state what happens next in the case where an appeal against an accreditation decision is accepted.

Both for the complaints and for the appeals commission, IKCA has regulations and has taken great care to ensure there are no conflicts of interests arising between members of the commission, members of EEGs, members of the Accreditation Council, and members of the complaining/appealing institution. The final decisions by the commissions are reached in an independent and impartial way.

The process, confirmed by the review panel, is established but has not yet been implemented or tested. The panel confirmed during the visit in its meetings with both the chair and deputy chair of both commissions that they never received a complaint or appeal, and in its meetings with representatives of the institutions, they confirmed to the panel that to date they had not had any motives to file a complaint or an appeal. This is possibly the reason why questions from the panel with regards to what happens following a complaint or appeal being upheld could not be responded to in full, as the process as yet has not been tested. The absence of a complaint or appeal - up to now - means the review panel could not inspect an example of the documentation to track a complaint or appeal.

Panel commendation

1. The panel commends the professionalism of the chairs and deputy chairs of the complaints and appeals commissions.

Panel recommendations

1. The review panel recommends that IKCA make the procedures for filing complaints and making an appeal more visible and accessible on the website.

Panel suggestions for further improvement

1. The review panel suggests that IKCA modifies the procedures to allow for complaints and appeals to be made directly by e-mail or other digital means.
2. The review panel suggests that the deadline for filing appeals is lengthened: a well-substantiated appeal against a possibly wrong decision might easily require more than ten days from the reception of the decision. The panel suggests that 30 days might be a more proper deadline.
3. The review panel suggests that the initial agreement with the HEI is amended, to make explicit reference to complaints and appeals procedures.

Panel conclusion: compliant

ADDITIONAL OBSERVATIONS

POST REVIEW VISIT DEVELOPMENTS

The review panel notes that IKCA has been active in the enhancement and further development of the agency's internal quality assurance system and procedures, and processes for external assurance since the review panel visit. This is evident in some additional information and procedure amendments noted to the panel as part of the factual error response process. This additional information also included some corrections to data within the SAR. As required by ENQA guidelines, the review panel findings are based on the information and evidence available to the panel before and during the site visit and therefore no changes have been made to the panel conclusions as a result of changes or developments undertaken by the agency since. Similarly, the review panel has not corrected data within the SAR resulting from the agency's errors which were not identified during the review visit.

The review panel notes the following:

- I. Error in Table 3, p.17 (SAR p.26)
 - 2021 accreditation should read 10 accredited, 9 programmes for 5 years, 1 programme 3 for years
 - Total of 48 programmes accredited, 17 for 5 years, 12 for 3 years, 6 for 1 year, 12 for 0.5 years and 1 programme not accredited
- II. Error in Table 4, p. 18 (SAR p.14)
 - Accredited in BA programmes is 54, in the MA programmes is 16, doctoral programme is 1, total programme accreditation should read 71.
- III. Reports on negative accreditation decisions have since been published on the agency's website.
- IV. The establishment of a working group to select proposals from internal and external stakeholders, discuss and formulate proposals on the composition of the Supervisory Board for subsequent approval by the Director of the IKCA.
- V. Changes to the charter of IKCA:
 - The founder of the IKCA has been changed, now it is not the "Republican Scientific and Methodological Center", but an individual who is not related to the director of the IKCA.
 - Additions have been made to the charter that exclude the possibility of the Founder making decisions related to institutional and specialised accreditation, or to influencing the decisions of the Accreditation Council.

CONCLUSION

SUMMARY OF COMMENDATIONS

1. The review panel commends the agency's staff for their professionalism and commitment as attested to by institutions and other external stakeholders.
2. The review panel commends IKCA on the development of comprehensive and useful guidelines for self-assessment for institutions.
3. The review panel commends IKCA for a clearly documented external accreditation process consistent with international practice.
4. The review panel commends IKCA on establishing its experts' database.
5. The review panel commends IKCA on the inclusion of international experts on the external expert panels.
6. The review panel commends IKCA on the inclusion of students as equal and respected members in the expert groups.
7. The panel commends the professionalism of the chairs and deputy chairs of the complaints and appeals commissions.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

1. The review panel recommends that IKCA supplement the Strategic Development Plan with goals and objectives that are clearly related to the agency's mission, while being specific and measurable and allowing each staff member to relate to them and integrate them into their daily work.
2. The review panel recommends that IKCA involve external stakeholders and members of the agency's governing bodies in the governance of the agency in a more systematic and efficient way.
3. The review panel recommends that IKCA review its regulations and charter to ensure a clear separation of responsibility and authority between the agency's director, founder, and the governing entities and processes for the agency's accreditation processes, ensuring autonomy and independent decision-making processes for the agency's governing bodies.
4. The review panel recommends that IKCA develop and publish a transparent policy and procedure for the recruitment and selection of staff.
5. The review panel recommends that IKCA develop a transparent process and set of criteria for recruitment of external experts and internal governance for compiling and approving external expert group.
6. The review panel recommends that IKCA add expertise and competence in quantitative and qualitative data analysis to its current resources, to enhance the agency's capacity to analyse data from external QA activities and for development of thematic reports that would increase public awareness and enhance quality of higher education in Kazakhstan.
7. The panel recommends that IKCA insert an explicit statement within its strategic plan committing to the publication of thematic analyses on a predetermined periodic basis, such as one analysis per year and on relevant topics, with the actual publication of thematic analyses identified as key milestones in monitoring implementation of strategic goals.

8. The review panel recommends that IKCA develop a structured and systematic process for the professional development of staff.
9. The review panel recommends that IKCA establish more transparent recruitment process and procedures.
10. The review panel recommends that IKCA should invest to enhance the competence and skills of staff to support the future work and activities of the agency.
11. The review panel recommends that IKCA review its internal quality assurance guidelines, internal regulations and its suite of quality assurance documentation to:
 - a. remove inconsistencies and duplication within and between documents.
 - b. clearly indicate the responsibility at all stages within the accreditation process.
 - c. clearly indicate the feedback loops and monitoring stages.
12. The review panel recommends that IKCA establish internal mechanisms to enable systematic feedback and engagement from all staff in the strategic development and monitoring processes.
13. The review panel recommends that IKCA fully implement the functions of the Expert Councils and systematically embed the Expert Councils within the agency's consultation and improvement processes.
14. The review panel recommends that IKCA align the standards published on the agency's website with the self-assessment guidelines.
15. The review panel recommends that IKCA take proactive measures and implement a process to ensure the accreditation reports follow the standards and criteria set out in the respective documents.
16. The review panel recommends that IKCA increase its emphasis on enhancing the understanding of the full meaning of ESG part I, ensuring the implementation of ESG Part I, focussing on the effectiveness of IQA rather than the availability of IQA, and addressing in particular ESG:
 - (1.2) - addressing the concept of outcome-based programmes in a more consistent way;
 - (1.4.) - including the recognition of non-formal and informal prior learning next to the recognition of academic studies;
 - (1.7) - rethinking the concept of information management and applying it as a complex tool for the development of IQA system;
 - (1.9) - addressing the periodic review of programmes in a more holistic way, taking into account all relevant aspects and involving students and other stakeholders.
17. The review panel recommends that IKCA establish more formal and systematic processes for involvement of external stakeholders in the development of and continuous improvement of EQA methodologies.
18. The review panel recommends that IKCA develop a policy on consultation and explore mechanisms to broaden and enhance its consultation processes.
19. The review panel recommends that IKCA establish clear rules and procedures for combining several study disciplines in one programme accreditation procedure to assure fitness for purpose and support the institution to improve the quality of programmes.

20. The review panel recommends that IKCA ensure the full implementation of internal processes and templates to achieve consistency in implementation of the standards and criteria in its external evaluation reports from expert panels.
21. The review panel recommends that IKCA consistently ensure that the composition of an expert group allows the group to provide meaningful feedback to all programmes under accreditation.
22. The review panel recommends that IKCA establish transparent guidelines and criteria for the compilation of expert groups and the appointment of experts.
23. The review panel recommends that IKCA implement a comprehensive training programme for experts the effectiveness of which is periodically monitored and improved on.
24. The review panel recommends that IKCA review the regulations on accreditation, including standards for institutional and programme accreditation as well as standards for accreditation of medical institutions and programmes, to ensure clear criteria for decisions at all levels, from the assessment criteria expert reports and to the criteria for decisions as result of post-accreditation monitoring, so that all parties involved have an overview of the assessment criteria applied throughout the entire process.
25. The review panel recommends that IKCA implement proactive measures to develop understanding and capacity of staff members, experts and members of the Accreditation Council, on the need for consistency and methodologies to ensure consistency.
26. The review panel recommends that IKCA implement measures to support the Accreditation Council in following the criteria for decisions set in the regulation and published and ensure that any deviation from the rules should be thoroughly justified and made available for the public as part of the accreditation decision.
27. The review panel recommends that IKCA formalise and publish all decisions on withdrawal of accreditation, to include an accreditation report and initial accreditation decision.
28. The review panel recommends that IKCA ensure that the withdrawal of the accreditation decision as a result of the post-accreditation monitoring stays within the sole competence of the Accreditation Council.
29. The review panel recommends that IKCA publish all accreditation decisions and reports, both positive and negative decisions, and correct all discrepancies with regards to missing reports on the agency's database.
30. The review panel recommends that IKCA establish a transparent process for the formal withdrawal of accreditation from an institution and removal of an institution from the IKCA register.
31. The review panel recommends that IKCA make the procedures for filing complaints and making an appeal more visible and accessible on the website.

SUGGESTIONS FOR FURTHER IMPROVEMENT

- I. The review panel suggests that IKCA establish formal and systematic strategic monitoring and annual planning processes within the senior management team and agency staff.

2. The review panel suggests that IKCA proactively consult with experts and stakeholders to identify relevant system level topics for thematic analysis for the enhancement of quality assurance in higher education.
3. The review panel suggests that, considering the strategic plans for international development, that IKCA provide opportunities for staff and encourage staff to develop English language skills.
4. The review panel suggests that IKCA explore, through its development partnerships with other agencies, the opportunities for staff mobility and peer learning.
5. The review panel suggests that IKCA encourage internal staff and external stakeholders to provide constructive, improvement-oriented feedback on the activities of the agency, to enable the agency to develop and continually improve its work.
6. The review panel suggests that as currently there is a significant difference between the two sets of standards for programme accreditation medical programmes and non-medical programmes, IKCA better align the two sets of standards in order to reduce the additional workload for experts and institutions caused by the different structure of similar criteria.
7. The review panel suggests that as currently the standards for accreditations of medical institutions and medical programmes are the same, IKCA use the standards for programme accreditation and develop a new set of standards for accreditation of medical institutions based on the standards for institutional accreditation of higher education institutions.
8. The review panel suggests that IKCA undertake a series of workshops and capacity building discussions with the agency's employees, experts and members of the Accreditation Council in order to establish a better common understanding of the content and consistent implementation of the standards and criteria.
9. The review panel suggests that IKCA encourage the experts to provide more recommendations for improvement to strengthen the internal quality assurance of educational institutions.
10. The review panel suggests that IKCA publish a complete and comprehensive methodology document on the agency's website, which should include a full version of standards and criteria.
11. The review panel suggests that where feasible, IKCA broaden its countries pool of international experts, to ensure it is engaging experts from the European Higher Education Area.
12. The review panel suggests that IKCA consider the equitable representation of students on larger panel and endeavours to ensure that each study discipline shall be evaluated with the involvement of a sufficient number of student experts.
13. The review panel suggests that IKCA broaden the decision-making options of the Accreditation Council, this may include giving the council the opportunity to i) send the report back to the expert group if the assessments are not sufficiently justified or if all aspects are not sufficiently analysed in the report, ii) to exercise discretion, if in the expert group's opinion 1-4 standards are partly met, and iii) exercise discretion if all standards are partially met and decide whether to accredit for 1 year or not to accredit.
14. The review panel suggests that the grounds for withdrawal of accreditation should be clearly documented in agreement with the institutions.

15. The review panel suggests that IKCA modifies the procedures to allow for complaints and appeals to be made directly by e-mail or other digital means.
16. The review panel suggests that the deadline for filing appeals is lengthened: a well-substantiated appeal against a possibly wrong decision might easily require more than ten days from the reception of the decision. The panel suggests that 30 days might be a more proper deadline.
17. The review panel suggests that the initial agreement with the HEI is amended, to make explicit reference to complaints and appeals procedures.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

DAY 1 - Wednesday, 2 November 2022					
SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER(s)	INDICATIVE TOPICS TO BE DISCUSSED
10.30-11.30	60 min	Review panel's private meeting at IKCA Offices	n/a	All	
1. 11.30 - 12.30	60 min	Meeting with IKCA Founder and Director	Founder & Director Khalмуратов Begaly Orazalievich		Agency structure, Ownership. Role of founder, Decision making processes, Strategic objectives, Resources
12.30-12.45	15 min	Review panel's private discussion			
2. 12.45-13.30	45 min	Meeting with representatives from IKCA Supervisory Board	Amreeva Tynyshkul Moldashevna - Candidate of Technical Sciences, Associate Professor, one of the founders of the IKCA , Ospanov Dastan Toleuovich - 3rd year doctoral student of the Kazakh Agrotechnical University named after S. Seifullin		Decision making, Resources
13.30-14.30	60 min	Review panel's private discussion and lunch			
3. 14.30- 15.30	60 min	Meeting with representatives from IKCA Senior Management Team	Adilgazinov Gaynelgazy Zainullinovich - Doctor of Physical Sciences, Professor, Director of the Department of Methodology, Monitoring and Quality Assurance		Strategic Planning, Annual work plan, Staffing, Thematic Analysis, Resources, EQA Activities

			(hereinafter DMMiOK), Sembaeva Aigerim Zhumkenovna - Director of the Accreditation Department (hereinafter DA), Konarbayeva Fatima Koishybaevna - Director of the Department of Financial and Economic Support, Chief Accountant		
15.30-15.45	15 min	Review panel's private discussion	n/a		
4. 15.45- 16.30	45 min	Meeting with the team responsible for preparation of the self-assessment report	Adilgazinov Gaynelgazy Zainullinovich – Doctor of Pedagogical Sciences, Professor, Director of DMMiOK, Sembaeva Aigerim Zhumkenovna – Director of THE DA, Konarbayeva Fatima Koishybaevna – Director of the Department of Financial and Economic Support, Chief Accountant, Rysbekov Asset Begalievich – IT Manager		Process for development of SAR. Internal Quality Assurance, Stakeholder Engagement.
16.30-17.30	60 min	Wrap-up meeting among panel members and preparations for day 2			
TBC		Review panel dinner (private)			

DAY 2 - Thursday, 3 November 2022

SESSION NO	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER	INDICATIVE TOPICS TO BE DISCUSSED
<i>08.30-9.00</i>	<i>30 min</i>	<i>Review panel's private meeting</i>			
5. 09.00-09.45	45 min	Meeting with key staff involved in external accreditation and evaluation	Baimaganbetova Gulnar Karzhasovna - chief expert of DMMiOK, Ashimbayeva Aidana Yerkebayevna – chief manager of DA, Abdrakhmanova Indira Bulatovna - manager of DA, Isina Saule Shakarovna, Ashiralieva Svetlana Nazarovna (online), Serikbay Zhanbolat Alievich, Peisova Gulnara Myltykbayevna (online), Kashikova Raikhan Daniyarovna, Baigozhin Kabylbay Sagyndykovich, Kanapyanov Serikzhan Satybaldinovich (online), Ramazanov Erzhan Kunshigarovich (online) (all regional representatives)		Internal QA, operation of agency procedures, selection and appointment of experts, evaluation reports. EQA Activities, for HEIs and institutions for additional education
<i>09.45-10.00</i>	<i>15 min</i>	<i>Review panel's private discussion</i>			
6. 10.00-11.00	60 min	Meeting with representatives from IKCA Accreditation Board	Myrzakhmetov Madi Muratbekovich - Head of the Unit of Industrial Training of the branch of JSC "NC KTZ" Kazakhstan Temir Zholy " - Center for Assessment and Development of Railway Transport Personnel, Chairman of the Council; Members of the Council: Stefan Dyrka – Doctor of Economic Sciences, Professor at the Upper		Accreditation Council: accreditation procedure, decision making process

			<p>Silesian University of Economics named after V. Korfantego, Katowice, Poland (online); Zhalairi Omiali Shakarapuly – Doctor of Law, Professor, Rector of the Eurasian Law Academy named after Kunayev (online); Ferkho Svetlana Ivanovna - Deputy of the Mazhilis of the Parliament of the Republic of Kazakhstan IV-V convocations. Candidate of Pedagogical Sciences. Member of the Association of Business Women of East Kazakhstan region; Tazhibai Bakytzhan Arynuly - Candidate of Medical Sciences, Master of Conflictology, Master of Business administration in health care; Akilbekov Abdirash Tasanovich - Doctor of Physics and Mathematics. Ph.D., Professor, Dean of the Faculty of Physics and Technology of the Eurasian National University named after L. A. Gumileva; Ospanova Dinara Tulevna - master of pedagogical sciences, doctoral PhD of the Eurasian National University named after L. A. Gumileva. Head of Educational and Methodical Work of the Educational School "Zerdeli"</p>		
11.00-11.15	15 min	Review panel's private discussion			
7. 11.15-12.00	45	<p>Meeting with representatives of IKCA</p> <ul style="list-style-type: none"> (i) Appeals Commission (ii) Complaints Commission 	<p>(i) Appeals Commission: Zavalko Nadezhda Aleksandrovna – Doctor of Pedagogical Sciences,</p>		<p>Appeals and Complaints Commission: Selection process, appeals and complaints process</p>

			<p>Professor of the Department of Pedagogy of the East Kazakhstan University named after S. Amanzholov, Chairman of the Commission: Ismagulova Aigul Turekhanovna – Candidate of Legal Sciences, Associate Professor of the Department of National and International Law of the University "Turan-Astana", Deputy Chairman of the Commission (online)</p> <p>(ii) Complaints Committee: Dairabayeva Aizhan Serikovna – Candidate of Economic Sciences, Associate Professor, Director Department for Academic Affairs of the University "Turan-Astana", Chairman of the Commission, Rusanov Vasily Petrovich - Doctor of Pedagogical Sciences, Professor of the Department of Theory and Methodology of Physical Culture and Sports of the East Kazakhstan University named after S. Amanzholov, Deputy Chairman of the Commission (online)</p>		
12.00-12.15		<i>Review panel's private discussion</i>			
8. 12.15-13.00	45 min	Meeting with ministry representatives	Narbekova Banu Mukataevna – Deputy Director of the Department of the Ministry of Science and Higher Education of the Republic of Kazakhstan (online)		Role and status of the agency within national context
13.00-14.00	60 min	<i>Review panel's private discussion and panel lunch</i>			

9.14.00-15.00	60 min	Meeting with heads and QA representatives of higher education institutions and institutions for additional education	<p>Seylkhanova Asemgul Saparovna – Dean of the Faculty of Economics of the Humanitarian and Technical Academy (institute and special accreditation), Nurlihina Gulmira Bulatovna – Deputy Director of the Institute of Pedagogy, Business and Law of the Almaty Humanitarian and Economic University (institute and special accreditation) (online), Omirali Zhazira Omiralykyzy - First Vice-Rector of the Eurasian Law Academy named after D.A. Kunaev (special accreditation) (online), Lygina Olga Ivanovna - the first Vice-Rector of Baishev University (special. accreditation) (online), Asylayeva Kadisha Kusbekovna – Head of the Department of Accreditation and Rating of the University "Turan-Astana" (special. accreditation), Abylkhalykova Rashida Nursultanovna (online) – lawyer of the accreditation department of the Institute "Symbat" (special. accreditation), Yessembekova Aigerim Muratkanovna – Deputy Director of the Corporation for Innovative Development (organization of additional education), Valieva Saule Arynbaevna – Head of LLP “International Scientific and Educational Center for Innovative Medicine</p>		External accreditation, external evaluation process
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15.00-15.15	15 min	Review panel's private discussion			
10. 15.15-16.00	45 min	Meeting with external experts/evaluators	<p>Petrusevich Arkady Arkadyevich - Doctor of Economic Sciences, Professor of the Department of Pedagogy of the Omsk State Pedagogical University (online) (2022), Tuyakova Zauresh Serikkalieвна - Doctor of Economic Sciences, Professor Head of the Department of Orenburg State University (online), Dauletova Aziza Mekemtasovna - Candidate of Economic Sciences, Associate Professor of the Department of Management of the Karaganda Economic University of Kazpotrebsoyuz (online), Dzhandigulov Abdygali Rezhepovich - Candidate of Physical and Mathematical Sciences, Associate Professor Eurasian National University named after L.N. Gumilyov (online), Davletova Ainash Khaliullinovna – candidate of pedagogical sciences, associate professor of ENU L.N. Gumilyov, Zhusupov Askar Eltaevich – Associate Professor of the Department of General Educational Disciplines of IT Astana University, Abdimanapov Bahadurkhan Sharipovich – Doctor of Geographical Sciences, Professor of the Kazakh National Pedagogical University named after</p>		External evaluation process. Evaluator training, evaluation reports

			<p>Abai, Aubakirova Roza Mukhamedsadykovna - Chairman of the Cycle Commission of the College of Urban Economy "Astana Profi", Zhubaniyazova AyZhanbulatovna - Deputy Director of Information Technology, D. College. A. Kunaeva, Pernebayeva Roza Emelevna – deputy director for Academic Affairs of the College "Astana IT University", Omarova Saltanat Zharylgasimovna - Deputy Director for Academic Affairs of the Vocational College</p>		
16.00-16.15	15 min	Review panel's private discussion			
II. 16.15-17.00	45 min	<p>Meeting with representatives of IKCA Experts Council to include: Expert Council for Higher Education; Expert Council on Additional Education; Expert Council for Medical Education.</p>	<p>Expert Council on Higher Education: Nagymzhanova Karakat Mukashovna - Doctor of Pedagogical Sciences, Professor, Head of the Department of Pedagogy and Psychology of the University "Turan-Astana", Aubakirova Zhanat Kanashevna - Ph.D., Professor of L.N. Gumilyov ENU (online), Turekulova Dametken Medikhanovna – d. A. Ph.D., Professor, Vice-Rector for Academic Affairs and Science of Esil University</p> <p>Expert Council for Additional Education: Konazhevskaya Lyudmila Nikolaevna - methodologist of the Polytechnic College, Gabdullina</p>	.	External QA and Internal QA Role of Expert Council

			<p>Zukhra Mindvaieva - Director of the Ural Higher Humanitarian and Economic College (online), Nurmagambetova Zhanat Amantayevna - Deputy Director for Academic Affairs of the Medical College Tomiris</p> <p>Expert Council on Medical Education:</p> <p>Sergaliyev Talgat Sovetovich – Candidate of Medical Sciences, Associate Professor of the Department of Public Health of the Karaganda Medical University; Umbetaliyeva Leylya Utegenovna – Director of the Higher College Meirbike (online); Egemberdieva Bakhytgul Usenovna – deputy director of Academic Affairs of Arystanbap Higher College (online)</p>		
17.00-17.15	15 min	Review panel's private discussion			
12. 17.15 - 18.00	45 min	Meeting with student representatives and student evaluators	<p>Zhulamanova Dinara Bolatovna (online) – doctoral student 2nd year in "Management" of the University "Turan" (inst. accreditation 2022); Nurlan Asemay Nurzhankyzy - 3rd year student of the specialty "Law" of the International University of Astana (special accreditation in 2022); Tambovtseva Tatyana Petrovna - 4th year student Public Enterprise "Banking and Financial Management of Kokshetau University named after</p>		External evaluation process, agency governance and student engagement

			<p>Sh. Ualikhanov (inst. accreditation 2021); Koishybai Asemait Kuanyshkyzy (online) – 3rd year student in "Information Technologies" of the Eurasian Technological University; Baymurat Zhemila Seitkamalkyzy (online) - a 4th year student of the OP "Food Products" of the Kazakh Agrotechnical University named after S. Seifullina; Esimov Ersain Kanatuly – 4th year student of the College of Innovative Technologies of KSTU; Glygalo Sofia Ivanovna (online) - a graduate of the Pavlodar College of Music, Sarybasov Abditaskin Mukhamedzhanuly – student of the 4th year of the State Committee for Combating and State Enterprise Turkestan zhogary kopsalaly college (online), Oteuova Konsulu Otemuratkyzy – 4th year student of the NC of Education “Caspian Modern Higher College (online), Iskam Margarita Sergeevna – student of the Kokshetau Humanitarian and Technical College</p>		
18.00-19.00	60 min	Wrap-up meeting among panel members and preparation for day 3			
TBC		Review panel dinner (private)			

DAY 3 - Friday, 4 November 2022

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER	INDICATIVE TOPICS TO BE DISCUSSED
08.30-9.00	30 min	<i>Review panel's private discussion</i>			
13. 09.00-10.00	60 min	Meeting with external stakeholder representatives such as employers, local community	<p>Mukhametkaliyzy Kazipa - Director of the Ethnocenter at "Ulpan" LLP, Aidarbekov Ruslan Dulatovich - Deputy Director for SMEs of the Akmola branch of Flsrt Heartland Jusan Bank JSC; Seydakova Nurzhamal Amangeldinovna (online) – Deputy Director for Academic Affairs of the school-gymnasium No. 38 named after Ondasynov; Nazarenko Alexander Vladimirovich – Deputy Chairman of the local trade union of the enterprise "Batyr Komir" (all TVE), Makarenko Lada Mikhailovna (online) - methodologist, teacher of preschool psychology and private disciplines of the Pedagogical College of Astana International University; Bekkozhin Serik Amangeldinovich – Chief Accountant of the Training Center “Zerde”; Valieva Saule Arynbaevna - head of LLP “International Scientific and Educational Center for Innovative Medicine”</p>		Stakeholder involvement, collaborations

<i>10.00-10.15</i>	<i>15 min</i>	<i>Review panel's private discussion</i>			
14. 10.15-11.15	60 min	2nd meeting with external stakeholder group, to include international collaborative partners/networks	Luit Kroes - Director Depratment The Netherlands (NVAO); Victoria Tishansky - Department Director (FIBAA); Maria Fartunova – Secretary General, Ass. Prof. Dr. National Evaluation and Accreditation Agency (NEAA)		Stakeholder involvement, collaborations
<i>11.15.-12.15</i>	<i>60 min</i>	<i>Meeting among panel members to agree on final issues to clarify</i>			
15. 12.15-13.00	45 min	Meeting with Director to clarify any pending issues	Director Khalmuratov Begaly Orazalievich		
<i>13.00-14.00</i>	<i>45 min</i>	<i>Review panel lunch(private)</i>			
<i>14.00-15.30</i>	<i>90 min</i>	<i>Private meeting between panel members to agree on the main findings</i>			
16. 15.30-16.00	30 min	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings			

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Independent Kazakhstan Center of Accreditation (IKCA) by ENQA

TRIPARTITE TERMS OF REFERENCE BETWEEN IKCA, ENQA AND EQAR

May 2022

1. Background and context

The Independent Kazakhstan Center of Accreditation (hereinafter referred to as IKCA) was founded in 2016.

IKCA is a non-governmental non-profit organization with the status of a legal entity established in the organizational and legal form of a non-governmental non-profit institution.

The mission of IKCA is to assist universities in creating an effective system of quality assurance of education and management systems in educational organizations that implement programs of all levels of education and additional education, using the procedures of institutional, specialized accreditation and rating research.

Since 2018, IKCA has conducted institutional accreditation of 10 universities, 263 organizations of technical and vocational education, 17 further education establishment.

Same time, the IKCA has accredited more than 1000 educational programs, including 60 higher education programs for the bachelor's degree, 10 master's programs, 1 doctoral program, for 10 universities, 976 educational programs for 222 colleges.

External quality assurance procedures implemented by IKCA in the areas of higher, technical and professional, additional (further) education³: institutional and specialized (programmatic) accreditation, post-accreditation monitoring, analytical reports on the results of accreditations.

IKCA has been an affiliate of the European Association for Quality Assurance in Higher Education (ENQA) since 2020 and is applying for ENQA membership.

IKCA is applying for inclusion on EQAR.

2. Purpose and scope of the review

This review will evaluate the extent to which IKCA (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of

³ According to Article 37 of the Law "On Education" of the Republic of Kazakhstan in Article 37. In the European Qualifications Framework, further education can correspond to levels from 6 to 8, that is, at the level of bachelor's, master's or doctoral studies.

higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of IKCA should be considered during the external review of IKCA:

- institutional accreditation of higher education organizations, incl. post-accreditation monitoring;
- specialized (programmatic) accreditation of educational programs, incl. post-accreditation monitoring;
- accreditation of organizations of additional (further) education, incl. post-accreditation monitoring.

The review should further analyse how IKCA ensures a clear separation and prevents conflicts of interest between the above-mentioned external quality assurance activities and its tasks of *provision of methodological and advisory assistance to educational organizations on accreditation issues, as well as consulting services for auditing and assessing the quality of education.*

The institutional and program accreditation of technical and vocational education organizations is outside of the scope of the ESG and not relevant for the application for inclusion on EQAR.

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

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between IKCA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website⁴);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested).

⁴ The agency is encouraged to publish the ToR on its website as well.

One of the members serves 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. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

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

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

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

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

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to 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 expected to contain:
 - a brief description of the HE and QA system;
 - the history, profile, and activities of the agency;
 - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
 - opinions of stakeholders;
 - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
 - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
 - a SWOT analysis;
 - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

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

the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

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

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include 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 usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

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

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

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind EQAR's *Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*⁵ to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

⁵ Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

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

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be

considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	May 2022
Appointment of review panel members	July 2022
Self-assessment completed	31 May 2022
Screening of SAR by ENQA Review Coordinator	June 2022
Preparation of the site visit schedule and indicative timetable	July 2022
Briefing of review panel members	September 2022
Review panel site visit	October 2022
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	December 2022
Draft of review report to be sent for a factual check to the agency	January 2023
Agency statement on the draft report to the review panel (if necessary)	January 2023
Submission of the final report to ENQA	February 2023
Validation of the review report by the Agency Review Committee	March 2023
Publication of report	March 2023
EQAR Register Committee meeting and initial consideration	12/13 June 2023
Decision on ENQA membership by the ENQA Board	June 2023

ANNEX 3: GLOSSARY

ACBSP - Accreditation Council for Business Schools and Programs (USA)

ACQUIN - Accreditation, Certification and Quality Assurance Institute (Germany)

ASIIN - The Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics (Germany)

AQ Austria - Agency for Quality Assurance and Accreditation (Austria)

ARQA - Agency for Recognition and Quality Assurance

AC - Accreditation Council

EACAQA - Eurasian Centre for Accreditation and Quality Assurance in Higher Education and Health Care

EEG - External Expert Group

EC - Expert Council

ENQA - European Association for Quality Assurance in Higher Education

ESG - Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015

EQAR - The European Quality Assurance Register for Higher Education

ESU - European Students' Union

HE - higher education

HEI - higher education institution

IAAR - Independent Agency for Accreditation and Rating

IKCA - Independent Kazakhstan Centre of Accreditation

IQAA - Independent Agency for Quality Assurance in Education

IA - institutional accreditation

KAZSEE - Kazakhstan Association for Modern (Elite) Education

MEDIA - Medical Institutional Accreditation

MEDPA - Medical Programme Accreditation

PA - programme accreditation

QA - quality assurance

RMSC - Republican Scientific and Methodological Centre for the Development of Technical and Vocational Education and Qualifications

SAR - self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY IKCA

ENQA background material

- ENQA Guidelines 2021
- ENQA Code of Conduct for Reviewers

IKCA Review Documents

- Self-Assessment Report (SAR)
- Self-Assessment Report - Annexes
 - Agreement for the provision of accreditation services
 - Code of Honour Employee of IKCA
 - Conflict of interest and privacy commitment statement (Experts)
 - Cost of institutional accreditation services in higher education institutions
 - Decision making by the Accreditation Council on institutional accreditation
 - Decision making by the Accreditation Council on specialised accreditation
 - Development Strategy IKCA 2021-2025
 - Experts Questionnaire
 - Feedback Questionnaire
 - Guidelines
 - i. Guidelines for compilation of the self-assessment report within the framework of institutional accreditation of higher education organisations, based on ESG 2015
 - ii. Guidelines for organising and conducting external evaluation
 - iii. Guidelines for Quality Assurance of the Independent Kazakhstan Center of Accreditation
 - iv. Guidelines for the self-assessment report for specialised accreditation of higher education institutions based on ESG 2015
 - Honour code of Accreditation Council member
 - Honour code of quality expert
 - Order on inclusion of IKCA in the registry of accreditation agencies
 - Provision about the Department of Methodology, Monitoring and Quality Assurance
 - Regulations
 - i. Regulation about Expert Council
 - ii. Regulation on the Accreditation Council
 - iii. Regulation on the Appeal Commission
 - iv. Regulation on the Complaints Commission
 - v. Regulation on the post-accreditation monitoring procedure
 - vi. Regulation on the Supervisory Board
 - Sample external evaluation programme for independent expert group (institutional accreditation)
 - Standards
 - i. Standards for Specialised Accreditation of Higher Education Institutions
 - ii. Standards on the Institutional Accreditation of Higher Education Institutions
 - Template for Report on Institutional Accreditation
 - Template for Report on Specialised Accreditation
 - The Charter of Non-profit institution Independent Kazakhstan Center of Accreditation

- **National/legislative information**
 - Extract education plan 2025
 - Information on the formation of the National Register of Accreditation Bodies of the Ministry of Education and Science of the Republic of Kazakhstan
 - Law on education in Kazakhstan
 - Register of recognised accreditation bodies
 - Regulation on non-commercial organisations
 - Rules for recognition of accreditation bodies

OTHER SOURCES USED BY THE REVIEW PANEL

Websites

- Documentation and information published on the agency's website [NU "Independent Kazakhstan Accreditation Center" \(nkca.kz\)](http://nkca.kz), including register of accredited institutions and accredited programmes
 - External site visit reports reviewed for 7 Universities as listed in table 7
 - Guidelines for compilation of self-assessment reports for institutional and specialised accreditation
 - Guidelines for compilation of self-assessment reports for accreditation of medical institutions and
- National register of recognised accreditation bodies https://enic-kazakhstan.edu.kz/en/accreditation/accredited_organizations
- [Ministry of Science and Higher Education of the Republic of Kazakhstan \(www.gov.kz\)](http://www.gov.kz)

Additional information provided to the review panel in advance of the site visit

- Additional financial information
- Additional information on 14 regional staffing structure
- Agency specialised accreditation comparability with other agencies
- Annual Work Plan 2022
- Composition of Appeals Commission and Complaints Commission
- Composition of Supervisory Board and the Accreditation Council
- Decision making process for the appointment of experts
- External audit report for Eurasian Academy of Law
- Functions of organisation's department/structures
- Guidelines for Quality Assurance
- Information about the founding organisation
- Institutional Accreditation Report – Rudny Polytechnic College
- List of Experts
- Note of Accreditation Council decisions (Protocol no 38)
- Post accreditation monitoring report - LLP "Kyzylorda University "Bolashak"
- Recording of meeting of the Supervisory Board 12 April 2022
- Report on post-accreditation monitoring – Rudny Polytechnic College
- Standards for institutional accreditation for organisations of additional education
- Thematic Analysis on Academic Mobility of Students and Teaching Staff on the Results of Accreditation of Educational programmes of Higher Education Institutions
- Updated dated table for SAR (pp. 12-14)

Additional information considered by the review panel during the site visit

- For institutional accreditation

- Sample report was provided in English to the review panel, the ‘report on institutional accreditation of the Humanitarian and Technical Academy of Kokshetau.’
- Sample report in Russian was taken as a source for analysis: ‘Peoples Friendship University named after academician A.Kuatbekov and Humanitarian-Technical Academy’
- For programme accreditation
 - MA programme in pre-school education from Almaty Humanitarian -Economic University
 - MA programme in HR management from Turan-Astana University’ and BA programme in accounting and audit from Baishev University Institution
- Job description for staff
- ‘Independent Accreditation Centre of Kazakhstan Internal Regulations’ (2022) – provided in hard copy to the review panel
- ‘Results of accreditation of educational bachelor programs in specialties business, management, and law’
- Report to the Ministry

ENQA AGENCY REVIEW 2023

THIS REPORT presents findings of the ENQA Agency Review of the Independent Kazakhstan Center of Accreditation (IKCA), undertaken in 2022.

enqa.

European Association for
Quality Assurance in Higher Education