ENQA AGENCY REVIEW

HUNGARIAN ACCREDITATION COMMITTEE (MAB)

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ENQA AGENCY REVIEW 2023

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EXECUTIVE SUMMARY

This report considers how MAB (Magyar Felsőoktatási Akkreditációs Bizottság, Hungarian Accreditation Committee) meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG-2015). It is based on the external review conducted between September 2022 and July 2023. This report provides information to the ENQA Board to aid its consideration of whether membership of MAB should be reconfirmed, and to the European Quality Assurance Register for Higher Education (EQAR) to support the agency's application for the renewal of its registration. MAB has been a member of ENQA since 2002. It has been reviewed by ENQA for compliance with the ESG in 2008, 2013 and 2018. The agency has been registered on EQAR since 2018.

MAB was established by an act of parliament in the first Higher Education Act in 1993 and operates by the 2011 Higher Education Act, its amendments, and Government Decree 19/2012 on Higher Education Quality Assurance and Enhancement. Currently, its ESG-based activities include the initial evaluation of higher education institutions (HEIs), programmes and doctoral schools, and the periodic accreditation of existing HEIs, doctoral schools and medical schools. MAB's evaluation/accreditation activities are built on objective criteria that are published on the website, along with the procedures, goals, and objectives of the agency. The aim of MAB is to enhance the internal quality culture of universities, improve the quality of Hungarian higher education (HE) and foster international recognition. Its resources derive from the annual budget received from the state and accreditation fees paid by HEIs.

Three key outcomes of the review concerning independence, peer-review experts and reports should be highlighted:

- 1. While the independence of the agency for operations and decision-making is guaranteed, there are challenges to its organisational independence because half of the members of the Board are delegated by the Minister responsible for higher education, and there are no clear criteria for selecting, appointing, and dismissing Board members. It is necessary for MAB to give more consideration to strengthening its organisational independence.
- 2. While the work of the agency is held in high regard by stakeholders, the involvement of international and non-academic experts is low. Since 2018 the number of students participating in decision-making processes has increased and they are included in all discipline-specific expert committees, yet they are not involved in all the activities of the agency.
- 3. While the format of the reports is clear and their contents are the result of the independent work of experts, in ex-ante programme evaluations reports by experts are not published in full. The panel recommends that within the new model of ex-ante programme evaluation that the agency is developing the reports produced by experts are published in full.

The panel finds MAB compliant with standards: ESG 3.1, ESG 3.2, ESG 3.4, ESG 3.5, ESG 3.6, ESG 3.7, ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.5 and ESG 2.7. In the panel's opinion, MAB partially complies with standards: ESG 3.3, ESG 2.4 and ESG 2.6. The panel has made recommendations under ten standards and suggestions for further improvement under seven standards.

In light of the documentary and oral evidence considered, the ENQA review panel is satisfied that, in the performance of its functions, MAB complies with the ESG.

INTRODUCTION

This report analyses the compliance of the Hungarian Accreditation Committee (Magyar Felsőoktatási Akkreditációs Bizottság, MAB, formerly abbreviated as "HAC" in English) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted between September 2022 and July 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, 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 MAB's fourth review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAB has been a member of ENQA since 2002. It has been reviewed for compliance with the ESG by ENQA in 2008, 2013 and 2018. Since 2018 MAB has been registered on the European Quality Assurance Register (EQAR).

SCOPE OF THE REVIEW

As included in the Tripartite Terms of Reference (Annex 2), between MAB, ENQA and EQAR (September 2022, amended February 2023), the following external quality assurance (QA) activities are subject to this review:

- Initial (ex-ante) evaluation of higher education institutions.
- Initial evaluation of programme and learning outcome framework requirements of Vocational Education and Training (VET) programmes.
- Initial evaluation of programme and learning outcome framework requirements of Bachelor programmes.
- Initial evaluation of programme and learning outcome framework requirements of Master programmes.
- Initial evaluation of VET programmes.
- Initial evaluation of Bachelor programmes.
- Initial evaluation of Master programmes.
- Initial evaluation of doctoral schools.
- Ex post accreditation of existing higher education institutions in five-year cycles.
- Ex post accreditation of existing doctoral schools in five-year cycles.
- Accreditation of medical schools based on the WFME 2020 standards.

The review also addresses (to the extent of the available information), the following planned external quality assurance activities (currently in a design phase) related to:

- renewal of the ex-ante evaluation (registration) of VET, Bachelor and Master programmes.
- ex-post evaluation of VET, Bachelor and Master programmes based of study fields (clusters).
- integration of ex-post accreditation of doctoral schools into the institutional accreditation procedure.

The panel could not evaluate these three activities against the ESG because they are still in the design phase, but a discussion about them helped to better understand the planned changes in the external QA scheme.

Likewise, the review includes activities offered abroad i.e., Ukraine.

Excluded from this review is the external evaluation of full professorship applications of HEIs. This activity is outside of the scope of the ESG and not relevant for the application for inclusion in EQAR.

Main findings of the 2018 review

MAB was last assessed against the ESG in 2018. According to the external review report, MAB was found to be in the following state of compliance with Parts 3 and 2 of the ESG:

- ESG 3.1 Activities, policy, and processes for quality assurance Fully Compliant
- ESG 3.2 Official status Fully Compliant
- ESG 3.3 Independence Fully Compliant
- ESG 3.4 Thematic analysis Substantially Compliant
- ESG 3.5 Resources Fully Compliant
- ESG 3.6 Internal quality assurance and professional conduct Substantially Compliant
- ESG 3.7 Cyclical external review of agencies Fully Compliant
- ESG 2.1 Consideration of internal quality assurance Fully Compliant
- ESG 2.2 Designing methodologies fit for purpose Substantially Compliant
- ESG 2.3 Implementing processes Fully Compliant
- ESG 2.4 Peer-review experts Partially Compliant
- ESG 2.5 Criteria for outcomes Fully Compliant
- ESG 2.6 Reporting Fully Compliant
- ESG 2.7 Complaints and appeals Substantially Compliant

The ENQA Board decision on MAB's overall substantial compliance with the ESG and the continuation of the agency's membership in ENQA was issued on 13 September 2018. In MAB's follow-up report (September 2020), the agency informed of the actions taken since 2018 and the actions to be completed by late 2022/early 2023. At its meeting on 21 October 2020, the Board of ENQA approved the follow-up report arising from the external review and took note of the progress that had been made.

REVIEW PROCESS

The 2023 external review of MAB was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of MAB was appointed by ENQA and composed of the following members:

- Sandra Bezjak (Chair, ENQA nominee), Assistant Director, Agency for Science and Higher Education (ASHE), Croatia.
- Nieves Pascual Soler (Secretary, ENQA nominee), Director of PhD School, Valencian International University, Spain.
- István Vilmos Kovács (EURASHE nominee), Director for the development of learning and teaching, Budapest Metropolitan University, Hungary.

• Matej Drobnič (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool), PhD student in Mechanical Engineering, University of Ljubljana, Slovenia.

Milja Homan, ENQA's Project and Reviews Officer, acted as the review coordinator for this review.

The review panel received the self-assessment report (SAR) in December 2022 and met for the first briefing meeting on February 3rd, 2023. During this meeting the review panel received input from the review coordinator on the purpose of the review and on the updated guidelines, and from the Deputy Director of EQAR, Melinda Szabó, on the renewal of registration. As a result of that meeting, in further communication with the agency, the Terms of Reference was supplemented with three new activities which are still in the design phase.

Prior to the physical site visit, the panel attended an online meeting with MAB's Director of International Affairs and the agency's contact person for the review on March 17th, 2023, to better understand the agency's context, the organisational structure of MAB and the procedural steps of the external quality assurance activities included in the Terms of Reference.

The draft review report was completed on June 3rd and sent to MAB for the factual check on June 5th. The final review report was submitted to the ENQA's Agency Reviews Committee on July 3rd, 2023.

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

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

Self-assessment report

The SAR was developed by a working group appointed by the MAB Board in its plenary meeting on 25 March 2022. The working group consisted of QA experts, members representing HEIs and their stakeholders, a student representative, and current and former members of MAB's Secretariat.

In May 2022, members of the Secretariat, coordinated by the Director of International Affairs, started to collect background documents, and supporting evidence to draft the SAR. After attending the "ENQA Agency Reviews' seminar for agencies planning to undergo a review in 2022-2023" in Cologne, Germany (May 31- June 1, 2022), the Secretariat held a meeting on further tasks related to the preparation of the SAR and drafted the report. The report was then forwarded to the working group members for comments, evaluation, and suggestions. The working group discussed the report with the members of the agency's International Advisory Board at the meeting held in Budapest on 1-2 September 2022.

During the preparation of the SAR, a SWOT analysis was conducted among the members of MAB's Board, standing committees and the Secretariat. Their responses were analysed by the agency's IQA officer and by external sociology and economy experts. These were presented in the SAR. The SAR was also reviewed by Christina Rozsnyai, former MAB's officer and member of the ENQA Board, the management, the President of the agency, and MAB's Board. It was finalised on 28 November 2022.

The review panel found the SAR to be informative and reflective. The findings contained in it allowed the agency to identify its strengths, weaknesses, opportunities, key challenges, and areas for further development. It also served as a valuable source of information to the panel.

Site visit

The panel had a preparatory meeting on 28 March 2023, in Budapest, before the site visit, at MAB's facilities, to outline overall tasks and issues to discuss.

During the site visit (29-31 March 2023), the panel met with the team responsible for the SAR, MAB's boards, its committees, members of the Secretariat, visiting teams and external experts, HEIs' representatives, groups of stakeholders from outside academia, students involved in the evaluation procedures of MAB, and other representatives relevant for the functions of the agency (Annex I).

The panel took the following steps for the purpose at hand:

- It developed general lines of enquiry and established an agenda of issues to be clarified with each group. The list of themes and questions was refined as meetings proceeded.
- It deliberated on the SAR, went through all the documents available and identified additional documents it wished to have access to.
- Based on the information presented, the panel drew its conclusions.

The panel tackled every ESG criteria in private discussions, debated key findings and confirmed areas of concern. The site visit concluded with a final de-briefing meeting involving the panel members, staff, and board members of the agency.

The panel wishes to express its gratitude to all the parties that met with and helped the panel to better understand the activities of MAB and the context within which the agency operates. The staff of the agency demonstrated high professionalism during the entire process and provided excellent assistance to the panel on all matters. The availability, openness, and honesty of communication of the interviewees are much appreciated.

After the site visit the panel secretary drafted the report in cooperation with the rest of the panel. The report is based on the SAR; the folders with relevant documentation prepared by the ENQA coordinator, organised in Drive; the documents submitted by the agency prior and during the site visit; the agency's webpage; the OECD's report "Ensuring Quality Digital Higher Education in Hungary," published on 29 March 2023; and the report "Academic Freedom in Hungary," commissioned and funded by the OSUN Global Observatory on Academic Freedom at the Central European University in Vienna, Austria, issued in 2021.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The Hungarian Higher Education System operates within Act CCIV of 2011 on National Higher Education. The Act describes the basic principles of higher education as well as its core activities, and sets out the rules of operation, organisation, and governance.

Across the country there are 64 state-recognised HEIs, as listed in Annex I of Act CCIV of the 2011 HE law. The law distinguishes between three types of institutions: universities, universities of applied sciences and university colleges. HEIs also differ from each other depending on whether they are state-owned or non-state. The latter are private entities operated by churches, business organisations or public interest trust foundations. Higher education institutions are universities (45%), universities of applied sciences (16%), and colleges (39%). Of these 64 institutions, 40% are church-funded and three-quarters of the church-funded institutions are colleges (SAR 6-10, OECD's "Ensuring Quality" 34).

To qualify as a university an institution has to offer eight bachelor's degrees, six master's degrees and doctoral programmes. Universities of applied sciences must offer four bachelor's degrees and two

master's degrees and at least two dual trainings (if its accreditation includes engineering, IT, agriculture, nature science or business studies). Last, colleges are authorised to provide bachelor programmes, master programs, single cycle long programmes and training that does not result in a HE degree (vocational training and postgraduate specialist training).

According to data from the Hungarian Central Statistical Office (Központi Statisztikai Hivatal), the overall number of students in the Hungarian HE system in the 2021/2022 academic year was 293,566, the highest in the last five years (SAR 6):

Academic year	Total number of students in VET programmes	Total number of students in BA/BSc programmes	Total number of students in MA/MSc programmes	Total number of students in single cycle Master programmes*	Total number of students in specialization and further education programmes	Total number of PhD/DLA candidates enrolled in formal programmes
2017/2018	12 236	170 320	34 854	41 834	16 430	7 676
2018/2019	11 182	168 799	34 043	42 922	16 950	7 565
2019/2020	97	172 104	33 081	43 519	15 795	9414
2020/2021	11 834	169 699	34 933	44 536	16 344	10 147
2021/2022	11 956	171 446	37 526	44 955	17 164	10 5 1 9

*A single cycle master programme is a one-tier programme leading to a master's degree, requiring the completion of 10-12 semesters and 300-360 credits.

In 2022, the management of higher education was transferred from the Ministry for Innovation and Technology to the Ministry of Culture and Innovation, under which the Higher Education Planning Board operates (the term of the members of the Board has expired, the nomination of new Board members is currently in progress). Since the last review in 2018, two major changes have taken place in the Hungarian Higher Education System:

- Establishment of institutions as Public Trust Foundations. Public Trust Foundations were introduced by the Ministry in 2019, starting with the "model change" of Corvinus University of Budapest. The change involves changing the maintenance and governance of HEIs from public to private. As of 2023, twenty-one HEIs, formerly state-run, are governed by a Board of Trustees who is appointed by the Ministry and works closely with the academic management to adapt to market requirements. The overall purpose is to increase the autonomy of universities (for launching new programmes and allocating resources), improve scientific research, involve more international students, and make Hungarian universities more competitive in the global rankings. As a result, permanently appointed employees have lost their civil service status and become employed in accordance with the Hungarian Labour Code.
- Introduction of a performance-based funding model. In 2021-22, a 3-to-5- year performance-based financing system was introduced in Hungary. The system uses performance indicators agreed upon by the government and individual HEIs. The aim is that, by 2024-25, 50% of all funding of foundation institutions will be based on a set of performance indicators that will incentivise the attention of universities to quality enhancement and the labour market (OECD's "Ensuring Quality" 36).

To accommodate the model change, in 2021 MAB started working on a Resilience and Recovery Facility (RRF) project for the "Sectoral modernisation of higher education training" (SAR 30). In 2022 the project was funded by the EU (RRF-2.1.1-21-2022-00001) with 1,762,553,496 HUF. It is to be completed in December 2023. Led by MAB, and developed in consortium with the Educational Authority, the Hungarian Rectors' Conference and the Digital Government Development and Project Management Ltd., the RRF project pursues the following aims: "to review the legislative environment of higher education [in Hungary] (drafting proposals for amendments), to implement interventions aimed at the renewal of higher education, and to implement and disseminate all these activities" (SAR 74). In line with these aims, the agency is developing and implementing new evaluation and accreditation procedures (SAR 74, Annex 5).

QUALITY ASSURANCE

Along with Act CCIV of 2011 on National Higher Education, the legal basis for the quality assurance system in place at the time of this review is provided by Government Decree 19/2012 on Higher Education Quality Assurance and Enhancement.

By law, HEIs are required to set a committee composed of professors, researchers, staff and students for the continuous supervision and evaluation of their educational and research activities, programmes, and facilities. HEIs conduct a self-evaluation and prepare a report in accordance with MAB's standards and guidelines.

The core activity of MAB is the accreditation of institutions and doctoral schools (SAR 22). In the case of programmes, the agency evaluates and issues its decision to the Educational Authority, an administrative body established by the government that acts as a higher education registration centre. While the Educational Authority cannot change the agency's decision, it can ignore a negative accreditation resolution; however, in the case of the launch of a master programme, the Educational Authority that registers programmes and issues operating licences to accredited HEIs. Licences are reviewed every five years.

While MAB is the only Hungarian QA body operating for HE, the Dual Training Council contributes to the development of quality, performance-based higher education through the quality assurance of dual training (Mission Statement of the Dual Training Council). Other bodies indirectly involved with QA are:

- The Hungarian Rectors' Conference: represents and protects the interests of higher education institutions.
- The National Union of Students in Hungary (HÖOK): represents students nationwide and cooperates with other national and international higher education and youth organisations.
- The Association of Hungarian PhD and DLA Candidates (DOSZ): represents its members' interests and plays a significant role in the organisation of scientific conferences for young researchers.
- The National Scientific Students' Associations Conference: represents and coordinates the student association movement and organises scientific and artistic workshops and forums for students to promote their work.
- The Hungarian Doctoral Council: "a body consisting of the chairs of the doctoral councils of higher education institutions, adopting positions in affairs relating to doctorate programmes and the conferral of doctoral degrees" (2011 Higher Education Act, XVIII.42,7(2)). It advises the Minister on different issues concerning doctoral schools.

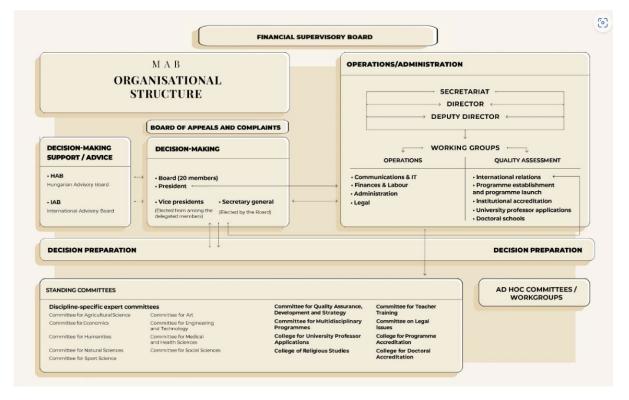
MAB

MAB was established in the Higher Education Act in 1993. The latest 2011 Higher Education Act, in Article 70 (1) defines MAB as "an independent national expert body established for the purposes of the external evaluation of the quality of educational, academic, research and artistic activities performed in higher education and the internal quality assurance systems operated by HEIs, and the provision of expert services in the procedures related to HEIs, as provided for in this Act."

MAB is a member of ENQA and is listed in EQAR. The agency is also a founding member of the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA). It has been accredited (since 1997) by the US National Committee on Foreign Medical Educational and Accreditation (NCFMEA) – responsible for assessing the accreditation standards of non-US medical schools and determining if those standards may be compared to US standards –, and in 2022 gained recognition status by the World Federation for Medical Education (WFME).

MAB'S ORGANISATION/STRUCTURE

The organisation chart of the agency is presented below (from MAB's website & Annex I of SAR):



According to the Rules of Organisation and Operation of the Hungarian Accreditation Committee, adopted via Decision 2019/9/X/I of the agency's Board, MAB consists of **MAB's Board**, a separate **Board of Appeals and Complaints** and the **Secretariat** working alongside MAB's Board and the Board of Appeals and Complaints, as well as a separate **Financial Supervisory Board**, which operates in accordance with Act CLXXV of 2011 on the right of association, on public benefit status and on the operation and support of non-governmental organisations (the NGO Act).

In addition, MAB has established Preparatory Committees or Expert Committees (also called "Standing Committees") and working groups, jointly referred to as "**Preparatory Bodies**." Their decisions are not binding for MAB's Board.

To provide MAB with continuous and direct feedback on its operations, the agency's Board has established **Advisory Bodies**.

In what follows comprehensive information is provided on the key tasks, composition, nomination/appointment procedures and length of term of these bodies.

• MAB's Board

It is the decision-making body of the agency in charge of:

a) Adopting final decisions in the procedures belonging to the scope of operations of MAB, except for appeal procedures.

b) Adopting the assessment criteria, guides, and additional rules of procedure (assessment documents) for the procedures belonging to the scope of operations of the agency.

c) Adopting the Rules of Organisation and Operation and Deed of Foundation of the agency, as well as additional detailed rules, policies and reports relevant to the operations and financial management of MAB.

d) Electing members of committees, working groups and advisory bodies.

e) Issuing position statements and proposals on matters relevant to MAB.

f) Commenting on proposed amendments to regulations submitted to it and formulating proposed amendments to regulations (Rules of Organisation and Operation, Section 1.2).

The composition of MAB's Board is set out in the National Higher Education Act of 2011 (Section 71). It has 20 members, all Hungarian. Of them, nine members are academics appointed by the Minister responsible for HE; two members are delegated by the Hungarian Academy of Sciences; one member by the Academy of Arts; three members by the Hungarian Rectors' Conference; two members by churches; one member by the Hungarian Chamber of Commerce and Industry, one member by the National Union of Students in Hungary, and one member by the Association of Hungarian PhD and DLA Candidates. During delegation, the delegating entities coordinate with each other to ensure the proportionate representation of larger fields of science. The President is nominated from among the members of the Board by the Minister, in consultation with the President of the Hungarian Academy of Sciences.

Members of MAB's Board are appointed for a term of six years. Their mandate can be renewed for one additional term. (The members delegated by the National Union of Students in Hungary and the Association of Hungarian PhD and DLA Candidates are appointed for two years.) Delegated members are appointed by the Prime Minister. Members of the Board – except for the persons delegated by the National Union of Students in Hungary and the Association of Hungarian PhD and DLA Candidates – are required to hold a doctoral degree or equivalent. Members of the Higher Education Planning Committee as well as rectors and government officials are barred from membership.

• Board of Appeals and Complaints (BAC)

It ensures that appeals and complaints are handled "on the basis of unbiased and objective considerations" (Rules of Organisation and Operation, Section 1.5.). It consists of three members nominated by the Minister responsible for HE and appointed by the Prime Minister. Their mandates are for six years (renewable once). It operates independently of MAB's Board. A new BAC was appointed in 2019.

• Secretariat

It "performs operative, legal, financial, administrative and clerical tasks" (Rules of Organisation and Operation, Section 1.6.). The Secretariat consists of 20 employees hired under the Labour Law, of whom 18 work full time and two part time. It is composed of the Director of the

Secretariat, the Director of Foreign Affairs, the Financial Director, six programme officers, seven administrative staff, one HR coordinator, one IQA agent and two IT officers (SAR 30).

• Financial Supervisory Board

It supervises the operations and financial management of MAB. Its work is supported by the Secretariat. It is composed of three members appointed by the Minister, with one member recommended by the Hungarian Rectors' Conference and a second by the Hungarian Academy of Sciences. Their mandates are for six years and are renewable. It meets at least twice a year.

• Preparatory Bodies: Expert Committees/Standing Committees and Working Groups

"The decision-making process of MAB proceeds through a hierarchy of levels" (SAR 13) Decisions of the Board must/may be preceded by work performed by preparatory committees and working groups.

In terms of composition, the Rules of Organisation and Operation of the Hungarian Accreditation Committee, Section 1.8. establish that:

- The chairpersons heading each preparatory body must be elected by MAB's Board at the proposal of the president, for a period not past the end of the tenure of the Board that elected the chairperson. The mandate of a chairperson elected during the tenure of MAB's Board expires at the end of that Board's tenure.
- Members of preparatory bodies are proposed by the chairpersons in agreement with the president of MAB. Members are required to be of relevance in the context of the preparatory body's discipline, branch of science, higher education in general, or professional issues (as a user) so that such body functions effectively and at high professional standards.
- The mandate of a non-student member of a preparatory body expires at the end of the tenure of MAB's Board that elected the member. The mandate of a non-student member elected during the tenure of the MAB's Board also expires at the end of that Board's tenure.

Preparatory committees/expert committees/standing committees

In MAB, there are nine **discipline-expert committees** and eight **expert committees responsible for special tasks**. According to the SAR, recruitment is by invitation: "committee members – approximately 220 experts – are invited from HEIs, and representatives of stakeholders from different fields" (SAR 13).

• Discipline-specific expert committees

These committees propose and appoint the evaluators for the evaluation/accreditation procedures. "These evaluators are most often already included in the MAB pool of experts, otherwise they are entered into the MAB database" (SAR 43). These committees receive the reports from the evaluators, discuss them and forward them "to the MAB Board for further discussion and decision making" (SAR 40).

They represent nine main fields: Agricultural Science, Art, Economics, Engineering and Technology, Humanities, Medical and Health Sciences, Natural Sciences, Social Sciences, and Sport Science.

The names of the members delegated to MAB's discipline-specific expert committees are available on the agency's website.

• Expert committees responsible for special tasks (only those relevant to this review are described):

College for Doctoral Accreditation (DOK): body between the decision-preparation level of site-visit teams and the decision-making level of the Board. It discusses feedback from doctoral schools and site-visit teams on accreditation procedures. As a result, improvements are made "such as modifying the structure of the self-evaluation criteria to reflect the order of the ESG standards, preparing guidelines for training site-visit teams with clarifying questions for each ESG standard, and providing a short introductory material about the site-visit team members to doctoral schools before visits" (SAR 38). DOK recommends the composition of site-visit teams for doctoral accreditation to MAB's Board, reviews and verifies the reports drafted by site visit teams to ensure consistency and coverage of all assessment criteria and operates according to its Rules of Procedure of the College for Doctoral Accreditation, which are annexed to MAB's Rules of Organisation and Operation.

College for Programme Accreditation: set up in 2020 by MAB's Board as "a body between the decision-preparation level of an expert committee [discipline-specific] and the decision-making level of the Board" with the purpose of ensuring "a uniform application of the MAB criteria in the procedures for launching a programme, and coherence in the content of the evaluations. The chair of [this committee] is a member of the MAB Board, and its members [are] selected based on their expertise in the procedures of programme launch and establishment, taking into account their disciplinary background" (SAR 38).

Committee for Medical and Health Sciences: responsible for second level evaluation prior to the Board's decision. It recommends the composition of site visit teams for the accreditation of medical education to MAB's Board, reviews and verifies reports drafted by site visit teams to ensure consistency and coverage of all assessment criteria, and proposes rules of procedure for the accreditation of medical education.

Committee for Multidisciplinary Programmes: set up in July 2020 by MAB's Board. It is "tasked with addressing cases of programme launch and establishment (within the frames of initial evaluation of VET, bachelor, and master programmes) involving more than two disciplines that belong to more than one expert committee" (SAR 38).

Committee for Quality Assurance, Development and Strategy: responsible for the agency's internal quality assurance and quality enhancement.

The names of the members delegated to MAB's expert committees responsible for special tasks are available on the agency's website.

Working groups

They are formed by the staff members of MAB to focus on specific tasks, consultations, and projects.

• Advisory bodies

They evaluate the professional activities of MAB and formulate proposals. They may also be requested by MAB's Board to state their opinion on individual matters. Members of advisory bodies are proposed by the president of MAB and are elected by MAB's Board for a period not extending past the end of the year following the expiry of the tenure of MAB's Board electing the member, but for a period of at least three years.

International Advisory Board (IAB)

It consists of seven renowned experts on HE and QA from different European countries. It meets once a year to review the work of MAB and issues formal recommendations. According to the information on the agency's website, MAB may also ask from the IAB to recommend experts for its external evaluations. As the term of the members appointed in 2014 expired at the end of 2022, MAB has recruited new members, and the International Advisory Board was renamed the Strategic Planning Board from 2023.

Hungarian Advisory Board (HAB)

It was first set up in 2002. After a pause, the HAB was re-established in 2012 with seven members from business and industry (SAR 20). It meets once a year.

MAB'S FUNCTIONS, ACTIVITIES, PROCEDURES

Within the scope of the ESG, MAB's activities are (SAR 20):

- a) Ex-ante (or initial) evaluation of:
 - new HEIs,
 - new VET, Bachelor, and Master programme and learning outcome framework requirements,
 - new VET, Bachelor, and Master programmes,
 - new doctoral schools and adding a new branch of science to an existing doctoral school.

b) Ex-post accreditation of:

- existing HEIs in five-year cycles, including the monitoring of program supervision performed by HEIs as requested by the National Higher Education Act,
- existing doctoral schools in five-year cycles,
- basic medical programmes of existing medical schools, based on the MAB WFME standards.

In addition, the agency has planned the following external quality assurance activities (currently in a design phase) related to:

- renewal of the ex-ante evaluation (registration) of VET, Bachelor and Master programmes
- ex-post evaluation of VET, Bachelor and Master programmes based of study fields (clusters)
- integration of ex-post accreditation of doctoral schools into the institutional accreditation procedure

The table below, extracted from the SAR (20), shows the number of procedures completed by MAB in the last five years:

Level and type of procedure	2018	2019	2020	2021	2022	
I. Procedures at institutional level						
I.I Ex post accreditation of existing	g higher educat	tion institut	tions in five	-year cycles	;	
Approved	6	10	19	8	7	
Rejected	0	0	I	0	0	
Total	6	10	20	8	7	
Monitoring procedures of higher ed	lucation institu	tions				
Approved	5	I	5	I	I	
Rejected	0	0	0	0	I	
Total	5	I	5	1	2	
1.2 Ex post accreditation of existing	g doctoral scho	ols in five-y	vear cycles			
Approved	9	93	14	26	16	
Rejected	5	7	3	I	I	
Total	14	100	17	27	17	
Monitoring procedures of docto schools	ral	1	1	1		
Approved	N/A	N/A	N/A	N/A	6	
Rejected	N/A	N/A	N/A	N/A	0	
Total	N/A	N/A	N/A	N/A	6	
2. Procedures at programme level		I				
2.1 Initial evaluation of programme bachelor, and master programmes	e and learning	outcome fi	ramework I	requiremen	its of VET	
Approved	П	12	7	4	6	
Rejected	10	11	11	3	3	
Total	21	23	18	7	9	
2.2 Initial accreditation of VET, bac	helor, and mas	ster progra	mmes		1	
Approved	68	81	22	66	37	
Rejected	52	67	58	45	38	
Total	120	148	80		75	
2.3 Accreditation of bachelor and n	naster progran	nmes in dis	ciplinary clu	usters		
Approved	0	0	0	0	0	

Rejected	0	0	0	0	0					
Total	0	0	0	0	0					
2.4 Accreditation of medical schools (programmes) based on MAB's WFME standards										
Approved	N/A	N/A	N/A	2	0					
Rejected	N/A	N/A	N/A	0	0					
Total	N/A	N/A	N/A	2	0					

As indicated in the table, in the last five years no ex-ante (or initial) evaluations of higher education institutions have taken place. The agency informed the review panel that there is an error in the table included in the SAR (20): the ex-ante evaluation and the ex-post accreditation of doctoral schools are merged, so the figures given here include both the ex-ante evaluation and ex-post accreditation procedures for doctoral schools.

Ex-ante evaluations of VET, Bachelor and Master programmes and ex-ante evaluations of programme and learning outcome framework requirements of VET, Bachelor and Master programmes are conducted via MAB'S database TIR (MAB's Secretariat's Information System). These are desk exercises whereby, after the programme officer has checked that legal requirements are met, two external experts assigned by MAB give their opinions. Then, MAB's expert committees discuss the case and make a proposal to the Board, which decides.

Ex-post accreditations of HEIs, ex-ante evaluations of doctoral schools and ex-post accreditations of doctoral schools involve a self-assessment report based on MAB's guidelines, a site visit, a review report, and a follow-up. Likewise, the accreditation of medical schools based on the WFME 2020 standards involves a self-assessment report, a site visit, a review report, and a follow-up. A more detailed description of quality assurance activities that fall under the ESG is provided under ESG 3.1. The processes of these activities are described under ESG 2.3.

At an international level, MAB has signed memorandums of understanding with other agencies (SKVC, ECAQA, ARACIS etc.), and associations (EPDAD). The agency has participated and continues to participate in EU projects, forums, networks, and working groups in the context of the Bologna Process. MAB has also launched its own online webinar series (in 2021), and its online periodical, *the Hungarian Accreditation Review* (in 2020). In 2021, MAB conducted the institutional accreditation of a foreign HEI for the first time. This is the agency's only cross-border activity since the last review. The request was received from the Ferenc Rakoczi II Transcarpathian Hungarian College of Higher Education in Beregovo, Ukraine.

MAB's funding

MAB is a non-governmental organisation for public service. Its resources derive from the annual budget received from the state and the fees charged for services performed in connection to evaluation, i.e., launching of bachelor's, master's and VET programmes, opinions prepared for appeals, accreditation of HEIs and doctoral schools, and the evaluation of university professor applications.

During the past five years, the agency's main items of expenditure have been:

- The staff of the Secretariat, which increased in number, from 16 in 2018 to 20 in 2023.
- The regular updating of IT hardware and software.

- The rise in fees, as of 2022, for site-visit members participating in institutional accreditation.
- The preparatory costs of the RRF Project in 2021, which account for a negative cash balance of 21,966 million HUFF at the end of the said year.

Although there has been no significant change in state budget support to the agency, MAB's own revenues decreased from 28% of the total budget in 2018 to 18% in 2021 (SAR 30). For regulations legislating public expenditure and further information on MAB's resources, see ESG 3.5 below.

FINDINGS: COMPLIANCE OF MAB 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

MAB was created by the Hungarian Government in the Higher Education Act of 1993 for "the validation of the quality of education and scientific activity in higher education" (Section 80.1). An overview of MAB's organisational structure is provided on its website, in Annex 4 of the SAR (73) and in this report (see MAB's Organisation/Structure above and ESG 3.3).

In line with the agency's mission statement (available on its website along with its vision and values), as stated in the Preamble to the Strategy of the Hungarian Accreditation Committee 2019-2024: "the main task of the MAB is to assess the quality of Hungary's higher education institutions, to objectively examine compliance with [...] the requirements and conditions of higher education programmes, and to provide an independent and unbiased assessment of the quality of education."

MAB's range of external QA activities is prescribed in the legal regulations (i.e., 2011 Higher Education Act, Government Decree 19/2012, and Deed of Foundation). They are described in Chapter 4 of the SAR and presented in the Section "Scope of the Review" within this report. The main activity areas of MAB in the field of QA within the scope of ESG are:

- Ex-ante (initial) evaluations.
- Ex-post accreditation procedures.

Ex-ante evaluations are independent expert reviews of HEIs, of new programme and learning outcome framework requirements of vocational education and training (VET), Bachelor and Master programmes, of VET, Bachelor and Master programmes, of new doctoral schools and adding a new branch of science to an existing doctoral school. In the last five years no ex-ante evaluations of HEIs have been conducted.

On December 20, 2022, Article 15 (1) of Act CCIV of 2011 on National Higher Education was enforced. It established that once a HEI is accredited it can launch a new master programme without initial evaluation (except for master programmes in teacher training and in the field of public administration). As a result of this legal change, MAB is redesigning and simplifying the process of exante programme evaluation to support the development of IQA in the institutions. The new process, which will start in September 2023, will reduce bureaucracy, involve students (students have not been involved so far as external experts but are part of disciplinary committees), and train institutions on quality standards, management, and improvement. According to the senior management team of the

Secretariat, the president of the agency and representatives of universities, the development of IQA within institutions, although still a challenge, is being furthered by the increase of communication between HEIs and MAB. In their view, this increase of communication indicates a change of attitude towards the agency, now seen as a service provider rather than service enforcer.

The ex-post accreditation procedures are carried out for HEIs and doctoral schools and include assessment of medical schools against the MAB medical criteria based on the WFME (World Federation for Medical Education) / BME (Basic Medical Education) 2020 standards. Until 2018 MAB conducted ex-post programme accreditation in disciplinary clusters, which examined an entire discipline on all levels at all institutions where it was taught in the country. The process was labour-intensive and time-consuming for the agency. It was discontinued because "the criteria were not fit for purpose, [...] it did not deliver the expected results and did not provide sufficient support to quality enhancement" (SAR 12). Although by law programme accreditation in disciplinary clusters may still be carried out at the request of the Minister responsible for higher education, MAB is piloting an ex-post evaluation system based on study fields within the framework of the RRF project. The pilot, which will start in April-May 2023 and finish on June 30, includes ESG I-10 and integrates micro-credentials.

In September 2019, MAB introduced the ex-ante evaluation and the ex-post accreditation of doctoral schools in five-year cycles based on the ESG. Currently MAB is designing the integration of the expost accreditation of doctoral schools into the institutional accreditation procedure. It is worth highlighting that during the interviews with representatives of universities and other stakeholders, the panel was assured that they are consulted in the preparation and development of quality assurance activities. The interviewees also emphasised the role of MAB in fostering a quality culture in the Hungarian HE system and appreciated the supportive role of the agency during the transition to the model change.

In addition, the agency organises conferences, training sessions (training materials were provided to the panel during the site visit), seminars on QA, and disseminates its findings through the online journal and website. Relatedly, the panel found on MAB's website that the agency also provides "consultancy" activities to HEIs. During the interviews, the panel learned that, strictly speaking, these are not "consultancy" activities but workshops (about standards, procedures, etc.) to prepare HEIs for accreditation. They are part of the accreditation process and are free of charge. As described above, MAB is actively involved in EU projects, has signed cooperation agreements with other QA agencies, participates in international events, and offers activities abroad.

In 2021, MAB conducted the cross-border accreditation of the Ferenc Rakoczi II Transcarpathian Hungarian College of Higher Education in Beregovo, Ukraine. The external review took place in accordance with the standards and requirements applied in the ex-post accreditation of Hungarian HEIs. Part of MAB's international plans for 2023 is to "actively use the European approach and participate in the evaluation(s) of EUI alliances" (SAR 18). During the site visit the panel learned that there are plans for accreditation in Malta. Also, during the interview with the agency's staff in charge of external QA activities, the panel learned that by law, any foreign QA agency can be chosen for accreditation in Hungary, provided it is a member of ENQA and registered on EQAR. Even though MAB has not had any experience in this matter yet, interviewees assured the panel that current methodologies for cross-border activities are strictly ESG based.

It is reported in the SAR that due to the agency's international cooperation and cross-border activities the participation of non-academic experts in MAB's accreditation procedures is growing (23). Currently, the number of international experts in MAB's pool of experts is 86 out of 1,351 (according to data facilitated during the site visit). Although "international experts are increasingly involved in MAB review panels" (SAR 58) and play a prominent role in the agency through the International

Advisory Board, they are not part of expert committees nor of decision-making bodies (see MAB's organisation/structure above). As to non-academic experts, the number in the pool amounts to 23. The SAR indicates that: "Involvement of employer representatives in the MAB discipline-specific expert committees [...] started in 2019" (SAR 57). As it is, non-academic stakeholders are included in preparatory bodies, MAB's Board and advisory bodies. With respect to students, while they are present in MAB's Board and preparatory bodies, they are not part of all advisory bodies, nor are there students' representatives in the Board of Appeals and Complaints.

Analysis

Based on the information provided in the SAR and gathered during the site visit, the review panel confirms that MAB is engaged in regular EQA activities in accordance with its legal acts. Ex-ante evaluations and ex-post accreditation procedures are the main activities of MAB. The panel ratifies that this is also reflected in the mission and goals of the agency, published on the agency's website. Also published on the agency's website are the goals, objectives, criteria, and procedures of MAB's activities.

While the list of activities conducted by MAB is clear, that the agency provides "consultancy" activities to HEIs that are workshops to prepare institutions for accreditation induces to misunderstanding. The panel suggests that the agency is careful in using that term "consultancy" when referring to workshops that prepare HEIs for accreditation.

As seen above, the following quality assurance activities are in a design phase:

- renewal of the ex-ante evaluation (registration) of VET, Bachelor and Master programmes.
- ex-post evaluation of VET, Bachelor and Master programmes based of study fields (clusters).
- integration of ex-post accreditation of doctoral schools into the institutional accreditation procedure.

The information available on them is scarce. Still, all indicates that:

- Processes will be shortened.
- The agency will increase its compliance with international standards and practices for the external QA in HE.
- The capacity of HEIs to take ownership for the quality enhancement of their teaching and learning offerings will be strengthened.

The panel believes that the development of the IQA systems of institutions will be furthered by the increase in communication between HEIs and the MAB. In this respect, the panel commends the agency for changing its role from service enforcer to service provider. That notwithstanding, the panel notes that the organisational structure of the agency is complicated. As seen in the section on MAB's organisation/structure above, the decision-making process of the agency is hierarchical and involves many different bodies, which may make it hard to be fast and responsive to the changes taking place in HE. The panel recommends, therefore, that the agency simplifies its structure and transitions to a more horizontal organisation, with fewer hierarchical levels, to increase efficiency.

In 2018, the ENQA panel suggested that MAB included more students on its advisory boards and at least one student in each of its eight standing committees. Concerning this, the panel acknowledges that students are part of MAB's Board and of the nine discipline-specific expert committees (currently there is a new committee for Sport Science). The panel also acknowledges the intention of the agency to engage students in the new ex-ante evaluation procedure. Yet, it is clear to the panel that there are no students' representatives in all advisory bodies and in the Board of Appeals and Complaints. So, the panel suggests that students' representatives are included in all advisory bodies of the agency.

In 2018 the ENQA panel also suggested that MAB found ways to involve more non-academic experts in accreditation/evaluation activities and pursued the strategic plan of engaging more foreign experts in its quality assurance activities. The panel considers that the number of non-academic experts in the pool is low (23 out of 1,351). So is the number of international experts (86 out of 1,351). The panel recognises the efforts and achievements of the agency in internationalisation. Participation in international networks and projects allows the agency to benchmark its activities with the other QA agencies and gather good practices. In this sense, the panel commends the agency for setting up an International Advisory Board that provides advice to the agency and recommends experts for its external evaluations. In general, the panel commends the idea of Advisory Boards that serve to provide recommendations and guidance to the agency. Yet, there is scope for greater involvement of international experts in the agency's evaluation and accreditation activities. The panel understands that there is a linguistic barrier and that the introduction of English as the language of evaluation procedures is a challenge that the agency is raising to meet. Nevertheless, the panel suggests that MAB continues finding ways to involve more foreign experts in its procedures. Likewise, in view of the number of non-academic experts, the panel suggests that the agency continues working in the recruitment of employers.

Panel commendations

- I. The panel commends the agency for changing its role from service enforcer to service provider.
- 2. The panel commends the idea of Advisory Boards that serve to provide recommendations and guidance to the agency.

Panel recommendations

1. The panel recommends the agency to simplify its structure and transition to a more horizontal organisation, with fewer hierarchical levels, to increase efficiency.

Panel suggestions for further improvement

- 1. The panel suggests that MAB continues finding ways to involve more foreign experts in accreditation/evaluation procedures.
- 2. The panel suggests that the agency continues working in the recruitment of non-academic stakeholders, i.e., representatives of civil society, labour unions, entrepreneurs, and regional/local authorities.
- 3. The panel follows up on the 2018 suggestion that students' representatives are included in all advisory bodies.
- 4. The panel suggests that the agency is careful in using that term "consultancy" when referring to workshops that prepare HEIs for accreditation.

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

According to the current 2011 Higher Education Act, Chapter XVIII. 41. Section 70 (1), MAB is "a national expert body promoting the supervision, assurance, and evaluation of the quality of higher education, scientific research, and the scientific quality of artistic creation, which participates under this Act in procedures relating to higher education institutions, with special regard to doctorate schools." Section 70 (2) of the said Act makes explicit reference to the agency's responsibility to "ensure that its professional evaluation criteria, the contents of opinions and positions adopted by it, and the identity of participating experts – which information are public data for public interest – are publicly available." Section 70 (3) decrees that the agency "is authorised to acquire a non-profit legal status regulated in Act CLXXV of 2011 on the Rights of Association, non-profit status and the operation and funding of Civil Organizations." Section 70 (2) sets out the number of members comprising MAB, the protocol for the appointment of the president and selection of officials as well as the duration of the appointments.

Government Decree 19/2012 on QA in HE further establishes that MAB operates "in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) adopted by the European Association of Quality Assurance in Higher Education." It also dictates that the agency "adopts its own set of assessment criteria," and that the rules concerning the operations and structure of the agency be specified in the Rules of Organisational Operation (The Rules of Organisation and Operation of the Hungarian Accreditation Committee were published by the agency in October 2019).

Likewise, the Deed of Foundation of MAB, dated July 5, 2019, states that the agency is dedicated to "to the implementation of the European quality assurance standards supporting the Bologna Process," and in charge of performing the "external evaluation of the quality of education, scientific research and artistic activities in higher education, as well as of the internal quality assurance systems of higher education institutions."

Analysis

The SAR provided the panel with the relevant legal documentation in translation, which corroborates that the agency is formally recognised in national legislation and has an established legal basis.

The representatives of the Ministry of Culture and Innovation, HEIs, students and employers interviewed by the panel were cognisant of MAB's established legal status and supportive of its efforts to improve the quality of HE.

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.

2019 EQAR RC's conclusion: "[...] The Register Committee underlined the importance of ensuring not just a balanced representation in the nominated delegates to the Board but also of formal mechanisms and regulations to safeguard its organisational independence."

Evidence

Organisational independence

MAB is governed by a Board of 20 members headed by a President. As stipulated in the 2011 Higher Education Act and the Deed of Foundation, the agency's organisational structure and its work is independent from third parties. The terms of nomination and appointment of the President and the Board members are defined in the said Act.

As indicated above, in the section devoted to MAB's organisation/structures, of the 20 members comprising the Board, nine members are academics appointed by the Minister responsible for HE; two members are delegated by the Hungarian Academy of Sciences; one member by the Hungarian Academy of Arts; three members by the Hungarian Rectors' Conference; two members by ecclesiastical legal persons maintaining HEIs; one member by the Hungarian Chamber of Commerce and Industry, one member by the National Union of Students in Hungary, and one member by the Association of Hungarian PhD and DLA Candidates. According to the National Higher Education Act of 2011, except for the members delegated by the Association of Hungarian PhD and DLA Candidates and the National Union of Students in Hungary, all members shall hold academic qualifications. When delegating members, the delegating parties shall hold consultations with a view to ensuring the proportionate representation of major disciplines. Board members do not chair other MAB committees, and the members of the Education Planning Board, rectors, chancellors, civil servants, government and public officials cannot be appointed as Board members or as members of other committees in the agency.

As specified in the law, the president of the MAB shall be elected from its members based on the joint proposal of the Minister and the president of the Hungarian Academy of Sciences. The president shall be appointed by the Prime Minister. Officers are elected among MAB's members and shall determine MAB's rules of operation.

As stipulated in the law, the delegated members shall be appointed by the Prime Minister, based on the proposal of the Minister. Appointments may be renewed once. Except for the members delegated by the Association of Hungarian PhD and DLA Candidates and the National Union of Students in Hungary, members shall be appointed for a term of six years. The Prime Minister shall appoint the members delegated by the Association of Hungarian PhD and DLA Candidates and the National Union of Students in Hungary for a term of two years.

During the site visit the panel learned that the Minister cannot dismiss the Board members delegated by other stakeholder organisations. The panel also received confirmation that the legislative framework in place still does not regulate the criteria for the selection, appointment and dismissal of the Board and the President. Representatives from the Ministry of Culture and Innovation informed the panel that currently there are no plans to change the law in this matter. In general, however, in the view of stakeholders this lack of clarity does not imperil the agency's independence. The fact that the President is nominated by the mutual consent of two parties and that Board members are reputable professionals with years of experience ensures that management is conducted autonomously.

Operational independence

The SAR states that by law the president has control over the budget, and that the agency's "operational regulations are adopted by two-thirds of the Board" (SAR 26). These regulations involve

management of its staff, the recruitment, nomination and appointment of experts, QA criteria and processes.

Pursuant to Act I of 2012 of the Labour Code, the agency's employees are not civil servants (SAR 25). They are independently recruited based on qualifications and competence. As to experts, they are appointed according to MAB's Rules of Operation and Organisation and to additional rules for specific EQA procedures, such as the Rules of Procedure of the College for Doctoral Accreditation and the Rules of Procedure for the Accreditation of Medical Education (on the recruitment of experts see ESG 2.4). During the site visit, the panel ratified that the involvement of non-academic experts, foreign experts and students in the agency's activities has increased since the last ENQA review.

MAB adopts its own criteria, in accordance with Government Decree 19/2012. All the activities by Board members, staff and experts are conducted under the rule of the Code of Ethics, which regulates ethical behaviour and conflicts of interest. In October 2022 a new Code of Ethics was adopted, "which includes the core values of the ESG, as well as precise definitions and basic principles" (SAR 26).

Independence of formal outcomes

MAB takes its decisions on EQA procedures in line with the guides and "the evaluation criteria applicable to the type of case" (SAR 27). Decision-making is a three-level process: the expert committee makes the proposal to the corresponding discipline-specific standing committee, which in turn elevates it to the Board. Decisions are then sent to the Minister. According to the report "Academic Freedom in Hungary," although it is "possible for the Ministry to approve or reject study programs or institutional licenses irrespective of [MAB's] decisions. In practice, it is rare that an institution or study program, having received a favourable decision by the [agency], is not allowed to start up" ("Academic Freedom in Hungary," 16). By law, accreditation by MAB does not oblige the Educational Authority to licence a programme (except in the case of the launch of a master programme, when the Educational Authority is bound by the result of the expert opinion of MAB); yet the Educational Authority always licences programmes accredited by the agency.

Analysis

Based on the information in the SAR and the interviews with the different groups of stakeholders, the panel can conclude that the operational independence of the agency is guaranteed by MAB's responsibility in the allocation of its resources, in the development of its own methodologies and criteria, and in the appointment of experts.

Independence for decision-making is guaranteed by the fact that MAB's Board is the only body which takes decisions based on criteria that are pre-defined and published, in the development of which stakeholders have been involved.

Although all the stakeholders' groups were strongly convinced of the organisational independence of MAB, and no changes in this regard have taken place since its last review against the ESG in 2018, there are challenges due to two factors:

- Half of the members of the Board are delegated by the Minister.
- There are no clear criteria for selection, appointment, and dismissal of the Board members.

These two factors indicate that there are no formal mechanisms and regulations to safeguard the organisational independence of the agency. The panel is particularly concerned with the fact that almost half of the members of MAB's Board are directly proposed by the Minister without the

existence of any transparent criteria or any delegating procedure and can also be dismissed without any criteria. This creates a potential risk of possible interference with the Board members appointed in a way that can diminish the independence of the agency. It would be necessary to move from selecting people from the network of those involved in the appointment procedure to transparent competence criteria-based open calls. In this regard, no improvements have been made following up on EQAR's conclusion. The current review panel is aware that the 2018 ENQA review panel concluded that MAB was "fully compliant" on this standard. Yet, in the light of EQAR's concerns, this review panel has decided to put additional focus on organisational independence and recommends that MAB explores additional ways to strengthen it, especially regarding a more balanced representation of the nominated delegates to MAB's Board and the definition of clear rules and criteria for selection, appointment, and dismissal procedures for Board members. MAB might use the opportunity of the RRF project currently underway to suggest necessary legislative changes in this direction.

Panel recommendations

- The review panel recommends that MAB explores additional ways to strengthen its organisational independence, especially regarding a more balanced representation of the nominated delegates to MAB's Board so different groups of stakeholders can be adequately represented.,
- 3. The review panel recommends that MAB defines clear and transparent rules and criteria for selection, appointment, and dismissal procedures for its Board members so that the most competent candidates can be chosen without any governmental interference and the possibility to dismiss members without a limited set of reasons decreases. MAB might use the opportunity of the RRF project currently underway to suggest necessary legislative changes in this direction.

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.

2018 ENQA review recommendation

The panel recommends that the HAC ensures publication of the thematic work under way, disseminates it widely and follows up on the promise to publish reports and conduct more systemwide analyses. These are a key resource in supporting QA and establishing a quality culture.

2019 EQAR RC's conclusion: "[...] The Committee underlines the review panel's recommendation of ensuring the regular publication of thematic work and making use of such analysis more widely."

Evidence

In December 2020, MAB published on its website the report titled: "Thematic Review of Activities (2017-2020)." The analysis, outsourced to PricewaterhouseCoopers, focused on the perceptions of stakeholders, HEIs, students and experts regarding three EQA procedures: institutional accreditation; evaluation of new education and learning outcome requirements (establishing a new study programme), and accreditation of new study programmes (launching a new study programme). The

purpose of the report was to "prepare a midterm analysis for the leadership of the Hungarian Accreditation Committee [...] on the key accreditation activities, establish a methodology, survey tools, key performances indicators (KPIs) and benchmarks for regular future analysis and identify opportunities for [the agency] to contribute in new ways to the development of quality within higher education in Hungary" ("Thematic Review of Activities" I). An applied methodology was used for analysis, which included "a European accreditation overview, a quantitative analysis of [MAB's] administrative data, and a qualitative analysis of survey results" ("Thematic Review of Activities" I). As the result of the findings, conclusions, and recommendations in the report, MAB "decided to revise and simplify the processes of programme launch and establishment" (SAR 28).

In line with the decision to improve existing quality assurance procedures, within the framework of the RRF project, one thematic analysis on institutional accreditation (facilitated to the review panel prior to the site visit in English) was completed by a working group of MAB and published at the end of 2022. Based on data from the accreditation procedures conducted by MAB between 2017 and 2022, this thematic analysis examined durations of procedures, composition of visiting teams, gender and age of team members, involvement of students, participation of labour market representatives, assessment templates, and interpretation of ESG standards in the reports issued for accreditation. It ended indicating development directions. The panel learned from MAB's staff that the other thematic analysis mentioned in the SAR on page 28 on programme evaluation did not reach the in-depth of a thematic analysis and was only a statistical case study.

Under this ESG, reference is made in the SAR (28) to the report "Ensuring Quality Digital Higher Education in Hungary," funded by the European Union, implemented by the OECD, and developed in co-operation with the European Commission's Directorate-General for Structural Reform Support (DG REFORM), the Hungarian Ministry of Culture and Innovation (KIM) and MAB. The report, published at the time of the site visit, on March 29, 2023, offers an overview of MAB's accreditation procedures and issues "a list of potential digital education indicators to be integrated in the assessment frameworks used by the Hungarian Accreditation Committee (MAB) for the accreditation of higher education institutions" ("Ensuring Quality" 3).

The agency includes as thematic analyses in the SAR (29) publications in the Hungarian Accreditation Review, issued twice a year, MAB's annual reports, and the presentations made by MAB staff in national and international conferences, workshops, and forums.

Analysis

The panel notes that while the list of publications provided in the SAR, on page 29, shows that the agency is active in disseminating the outcomes of various activities, many of these publications (articles in the *Hungarian Accreditation Review*, annual reports, presentations) are not thematic analyses. That notwithstanding, the panel acknowledges the progress made in this area since the previous external review. Over the past five years the agency has conducted three thematic analyses, published in 2020, 2022 and 2023 respectively, describing and examining the general findings of its external quality assurance activities. Based on the evidence collected, the panel is convinced that the agency produces thematic analyses regularly and gathers feedback for further development and refinement of QA procedures. Although the panel considers that MAB is to a large extent in alignment with the standard, in the opinion of the panel there is room for improvement.

However valuable all thematic reports published are for the future operations of the agency, the panel notes that MAB has not explored the quality of programmes and institutions accredited through MAB. Up to now, MAB has not conducted thematic analyses on the quality of the institutions and programmes accredited (strengths and weaknesses) at the system level. Thus, the panel recommends that the agency continues gathering qualitative data and exploits the full potential of collected data and findings from EQA activities to regularly conduct and publish thematic analysis at the system level. To

ensure regularity, the panel also recommends that the agency devises a plan for conducting thematic analyses within its changing EQA processes and uses a systematic approach to selecting the themes of the thematic analysis.

Panel recommendations

- 4. The panel recommends that the agency continues gathering qualitative data and exploits the full potential of collected data and findings from EQA activities to regularly conduct and publish thematic analysis at the system level.
- 5. The panel also recommends that the agency devises a plan for conducting thematic analyses within its changing EQA processes to ensure regularity and for implementing a systematic approach to selecting the themes of the thematic analyses.

Panel conclusion: compliant

ESG 3.5 Resources

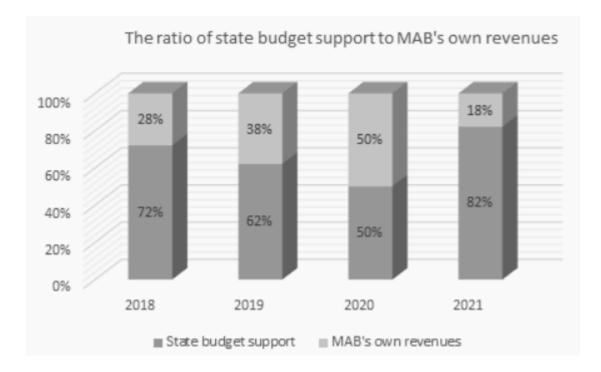
Standard:

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

Evidence

MAB "is a public benefit organisation" (Deed of Foundation) that operates on funds from the state and its own revenues. Decree 12/2013, from the Ministry of Human Capacities (EMMI), which regulates administrative fees in HE procedures, establishes that MAB may charge fees "for the registration of the establishment of a doctoral school, regarding its contribution under the Higher Education Act, and for other procedures initiated upon request" (SAR, 29). This document is public and available on the agency's website (in Hungarian).

The ratio of state funding versus the agency's funding is shown in the table below (on page 30 of the SAR). Between 2018 and 2020 MAB received 200 million HUF from the state. In 2021 that amount increased to 279 million, which compensated for the decrease in net sales to 59,912 from 84,967 in 2018.



Upon the request of the review panel, MAB facilitated its profit and loss statements from 2018 to 2021(2022 data was preliminary at the time of the site visit). They indicate that 75% of expenditures were in personnel, procedures, and material (maintenance of the agency's offices). Numbers confirmed the information contained in the SAR (30), and corroborated: a) a cut in the agency's spending of 4.7 million HUF in 2020 on account of the COVID-19 pandemic and the subsequent decrease in travels and face-to-face meetings; and b) a negative cash balance of 21,966 million HUF in 2021 due to the preparation costs for the RRF tender, from which the agency is already recovering, after winning the bid in 2022.

During the site visit, the Economic Director and the Financial Supervisory Board told the panel that the agency has been increasing its reserves since 2021, which has allowed investment in the development of the TIR system, of which the panel was offered a demonstration. As it is, in September 2022 the agency upgraded the TIR system (MAB's Secretariat's Information System) to TIR 2.0 (SAR 28). The panel was also told that in 2022 the ratio of state revenue and net sales was approximately 50%, and that there are plans to invest further in digitalisation, risk management, QA processes, expertise, and hiring. In this respect, the panel was informed that in 2022 there was a decrease in the number of visits (some of which were organised in a hybrid manner), and a rise in the fees for sitevisit members participating in institutional accreditation. The intention is to continue raising the fees for the experts involved in MAB's activities.

Since the last review, the number of the staff of the Secretariat has increased, from 16 in 2018 to 20 in 2023, "of whom 18 work full time and 2 part time" (SAR, 30). The current tendency is to recruit younger staff with "appropriate English language skills" (SAR, 30). From the meeting with MAB's Secretariat the panel learned that their administrative burden is still heavy and that they participate as full members in the review panels and contribute to the writing of reports. All in all, the Secretariat was satisfied with the possibilities offered by the agency to develop their competencies through regular training, organising working groups for special procedures, and participating in conferences, webinars, and project activities.

Analysis

The panel considers that the agency's budget is adequate for the implementation of the assigned activities. Stable funding from the state during the last five years shows the support of the government and guarantees the sustainability of all foreseen activities. Based on the evidence and the discussions with different stakeholders, the panel can conclude that there are no concerns over resources.

The current premises and infrastructure are adequate for the development of the agency's activities. So are human resources. It is clear to the panel that the agency has the intention to continue recruiting qualified staff. However, MAB is encouraged to be mindful of the workload of the Secretariat and carefully plan the assignments of its employees. On the one hand, the panel recommends the agency to reconsider the participation of the Secretariat in expert committees as full members. Their participation in expert committees as full members additionally increases the agency's staff workload and may imply a potential conflict of interest. The Secretariat staff needs to support the expert panel in drafting the review report by ensuring that all the information gathered during the site visit is included in the report, and that all standards are adequately addressed. Writing the findings of the assessment process is exclusively the responsibility of experts, as described under ESG 2.6. On the other hand, because the agency is not exploiting the full potential of data collected from EQA procedures (see ESG 3.4), the panel recommends that members of the Secretariat are involved in conducting thematic analyses.

Panel recommendations

- 6. The panel encourages the agency to be mindful of the workload of the Secretariat and reconsider their participation in expert committees as just coordinators rather than expert members.
- 7. The panel encourages the agency to involve the members of its Secretariat in conducting thematic analyses.

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.

2018 ENQA review recommendations

The panel recommends that the agency ensures methodical follow-up on and feedback from all procedures and all types of stakeholders, conducts systematic analysis of data regularly, informs users of improvements and developments from feedback and prepares the aggregated system-wide analysis on the impact of its own activity suggested by the former review panel in 2013.

Evidence

The criteria and guidelines for all external quality procedures, revised in line with the ESG 2015, are available on MAB's website. Also public are the agency's Mission Statement and the values it holds, the Rules of Organisation and Operation, the Labour Code, the Data Protection Regulation, the Quality Policy, the Internal Quality Management System (the English translation of the latter two documents was provided to the panel during the site visit), and the Code of Ethics (old and new).

MAB's Quality Policy states that its IQA system must support all services that directly or indirectly affect the operations of HEIs. MAB's Internal Quality Management System defines the agency's quality improvement cycle and aims at integrating "the service processes of external quality assessments (ESG part 2), to ensure operation according to ESG part 3." The Code of Ethics sets out the values, principles and rules of conduct that define the expected behaviour of MAB's members, staff, and stakeholders. It also includes rules of confidentiality, intellectual property, quality of work, cooperation, trust, and conflict of interest. During the site visit, the review panel confirmed that experts sign a declaration of non-conflict of interest and confidentiality, and that MAB's members are excluded from any discussion and voting when conflict of interest occurs.

MAB conducts regular surveys on institutional accreditation, collecting responses from HEI's stakeholders, students, and experts. The review panel ratified the existence of external feedback mechanisms with institutional representatives, but the students interviewed were uncertain about feedback surveys. In the case of doctoral schools, which is a new procedure, an "extensive feedback system is in place" (SAR 32). In the case of programme evaluation (except for the WFME/BME-based accreditation procedure), the agency has stopped collecting feedback because the process is under revision within the RRF project.

In addition to surveys, MAB has established specialised working groups to revise its IQA system and organises annual discussions of the working group leaders within the Secretariat where "they summarise their experiences and conclusions on the past year, supported by relevant data" (SAR 32). The main findings are presented in the open plenary session of the Board to which representatives of HEIs are regularly invited.

Key components of MAB's IQA system are the Hungarian Advisory Board and the International Advisory Board, both of which provide the agency with recommendations for improvements. The meeting with representatives of these bodies confirmed to the review panel that they have been actively involved in the development of the agency's procedures.

Analysis

MAB's internal QA system is based on a PDCA cycle.

In terms of Planning, the review panel can conclude that MAB has developed core documents to ensure that activities are carefully planned, and all persons involved in its activities act professionally and ethically. In relation to the step of Doing, MAB conducts its activities in line with its mission and strategic objectives and monitors them regularly. As to Checking through feedback, the representatives of HEIs and experts confirmed during the meetings that they had the opportunity to give their assessments upon the completion of an EQA procedure. Also, representatives of the standing committees, especially the Committee on Programme Accreditation and the College for Doctoral Accreditation, emphasised their involvement in the development of EQA procedures. Students were uncertain, though, of any developments from feedback and, thus, the panel recommends that the agency ensures that the students are included in providing their feedback and are informed of the improvements and developments from a broad range of stakeholders and is serving as a basis for improvements. Likewise, the RRF project underway is designed to ameliorate existing quality procedures and create new ones to ensure the effective restructuring of HEIs.

The panel can conclude that MAB has its IQA processes in place and, for the most part, has implemented the recommendations made in 2018. Many processes, though, especially regarding the revision of EQA methodologies (see ESG 2.2.), are ongoing. Their relevance and efficiency still must be seen in the future. Therefore, the panel suggests that MAB continues with assuring the quality of newly established and renewed EQA procedures.

Panel recommendations

8. The panel recommends that the agency ensures that students are included in providing their feedback and are informed of the improvements and developments resulting from surveys.

Panel suggestions for further improvement

5. The panel suggests that MAB continues with assuring the quality of newly established and renewed EQA procedures.

Panel conclusion: 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

MAB's internal quality assurance policy foresees the cyclical external evaluation of the agency, once in five years. The agency has been reviewed for compliance with the ESG by ENQA in 2008, 2013 and 2018. Since 2018 MAB has been registered on EQAR.

Analysis

MAB undergoes cyclical external reviews of its activities at least once every five years to ensure that its efforts advance the culture of quality higher education. The external review includes a report on its compliance with the ESG criteria.

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

The external quality assurance activities of MAB have been described in the introductory part of this report and in ESG 3.1. They are subject to national regulation, i.e., 2011 Higher Education Act, Government Decree 19/2012, and Government Decree 387/2015 on the initial accreditation of doctoral schools. In the SAR, Annex I, MAB provides a Table (69), reproduced below, indicating the alignment of the agency's assessment schemes with the ESG Part 1.

The panel notes the agency's support to HEIs in strengthening their own IQA systems. It was confirmed by all stakeholders interviewed. In addition, it was noticeable to the panel that representatives from HEIs and the Ministry were familiar with the ESG and acknowledged that MAB's activities are encouraging the modernisation of the Hungarian HE system.

The panel was provided with the English translations of the Self-assessment Guide for Institutional Accreditation; the Instructions, Forms and Requirements for Programme Launch; and the Doctoral School Guide. Relevant documentation in Hungarian on the website was also consulted. The Standards, Rules of Procedure and the Self-assessment Report Template for medical training accreditation were reviewed as well.

EQA activity of MAB	Туре	ESG 1.1	ESG 1.2	ESG 1.3	ESG 1.4	ESG 1.5	ESG 1.6	ESG 1.7	ESG 1.8	ESG 1.9	ESG I.10	MAB guideline/criteria	regulatory environment
initial evaluation of education and learning outcome framework requirements for VET, Bachelor and Master programmes	ex- ante	×	x					×				application form and guidelines (Institution submits labour-market assessment for such a programme only as information but MAB does not evaluate it)	National Qualification Framework
initial accreditation of VET, Bachelor and Master programmes	ex- ante	×	x	×	x	x	x	×	x	x	x	application form and guideline	National Qualification Framework
initial accreditation of institutions	ex- ante	x	x	x	x	x	x	x	x	x	x	Self-assessment Guide for Institutional Accreditation, including self-assessment report form	Regulations set down in the HE Act
initial accreditation of new doctoral schools at universities	ex- ante	x	x	x	x	x	x	x	x	x	x	self-assessment report form	HE Act and Government Decree (387/2012) on doctoral schools, doctoral procedures and habilitation
initial accreditation of adding a new branch of science to an existing doctoral school	ex- ante	×	x	x	×	x	x	×	x	x	×	self-assessment report form	HE Act and Government Decree (387/2012) on doctoral schools, doctoral procedures and habilitation
accreditation of doctoral schools in five-year cycles	ex- post	x	x	x	x	x	x	x	x	x	x	self-assessment report form	HE Act and Government Decree (387/2012) on doctoral schools, doctoral procedures and habilitation
institutional accreditation in five- year cycles	ex- post	x	x	x	x	x	x	x	x	x	x	Self-assessment Guide for Institutional Accreditation, including self-assessment report form	Regulations set down in the HE Act
accreditation of basic medical programs of medical schools based on WFME standards	ex- post	x	x	x	x	x	x	x	x	x	x	MAB Standards for Medical Education, MAB Rules of Procedure for the Accreditation of Medical Education	Global Standards of the World Federation for Medical Education (WFME)

Analysis

From the examination of the documentation on the website, the SAR and the information gathered during the site visit, the panel confirmed that the criteria used for initial (ex-ante) programme evaluation mainly follow the standards and guidelines of Part I, but the content of these criteria is adjusted to the needs of the procedure. Likewise, the criteria for ex-ante institutional evaluation, expost institutional accreditation, the ex-ante evaluation of doctoral schools and the ex-post

accreditation of doctoral schools directly follow the ESG part I. Although MAB-WFME Standards for Medical Education do not follow the ESG part I to the letter, the panel can confirm that they cover all the areas contained therein. Given its nature, due to its specific character, the evaluation of programme and learning outcome framework requirements for VET, Bachelor and Master Programmes addresses the ESG part I only partially. Requirements are based on ESG 1.2 and Article 4 (4) of Decree 65/2021 (29.XII.) of the Ministry on Innovation and Technology of the Qualifications for HE. It is important to highlight that in the last five years MAB has not conducted ex-ante evaluations of HEIs (as indicated in "MAB's Functions, Activities, Procedures"). In relation to the newly planned EQA activities added to the ToR (renewal of ex-ante programme evaluation, ex-post evaluation of programmes based of study fields, and integration of ex-post accreditation of doctoral schools into institutional accreditation procedure), because they are still in a design phase, they cannot be assessed by the review panel.

In the following analysis, the panel describes to what extent the external quality assurance procedures used by MAB assess the effectiveness of HEIs' internal quality assurance processes in relation to the ESG Part I.

ESG 1.1 Policy for Quality Assurance

This standard is addressed in ex-ante and ex-post procedures. In each procedure, though, the focus is slightly different. In the ex-ante evaluation of programmes, a quality policy is not mentioned explicitly, but the meaning of the standard is reflected by assessing the processes the HEI is implementing in planning the programme and ensuring that contents, teaching processes, learning support and resources are adequate. In ex-ante institutional evaluations and ex-post institutional accreditations, the focus is on quality policy, on how it translates into practice through a variety of IQA processes that allow participation across the institution, and on how the policy is implemented, monitored, and revised in the institution's decision. In the ex-ante evaluation of doctoral schools and in the ex-post accreditation of doctoral schools, the assessment specifically tackles the implementation of quality policy in practice. The focus is on the integration of the QA system of the doctoral school within the internal QA system of the institution and with the involvement of stakeholders, particularly on how the QA system supports the development of research/artistic activities. In the MAB-WFME accreditation procedure for medical education, policy for quality assurance and its implementation along with the involvement of stakeholders is covered in a very detailed manner, through the assessment of the mission statement of the school, its internal QA system, number of activities based on the PDCA cycle, management structure, organisation, decision-making process, internal control, and operational risks.

ESG 1.2 Design and approval of programmes

ESG 1.9 On-going monitoring and periodic review of programmes

These two standards are analysed together because this is the way MAB addresses them in most of its EQA procedures. Design, approval, and revision of programmes are tackled in the criteria implemented for all EQA procedures conducted by the agency. Again, the focus varies depending on the type of assessment. In ex-ante programme evaluation, the focal points are on the development of the contents of study, the curriculum, disciplines, fields of knowledge and output competences. In exante institutional evaluation and ex-post institutional accreditation special attention is given to the launching of new courses, revision of implemented courses, and involvement of stakeholders in this process. Ex-ante evaluation of doctoral schools and ex-post accreditation of doctoral schools concentrates on the training programme of the doctoral school, its alignment with the institutional and research directions in the field and with the mission and vision of the doctoral school, procedures of development, and involvement of stakeholders. In the MAB-WFME accreditation of medical education several standards cover how the medical school develops, approves of, and revises its

educational programme, the transparency and clarity of its processes, and whether biomedical and clinical knowledge and skills are adequately included in the curriculum.

ESG 1.3 Student-centred learning, teaching and assessment

All EQA procedures conducted by the agency include criteria to evaluate teaching, learning and assessment practices to ensure the achievement of the intended learning outcomes. In ex-ante programme evaluation, the suitability of planned teaching, the methods that enable active learning, and the offering of flexible and inclusive learning pathways are considered. In ex-ante institutional evaluation and ex-post institutional accreditation the standard is addressed in a very detailed way and emphasis is also put on the analysis of the results of students' assessment. Ex-ante evaluation of doctoral schools and ex-post accreditation of doctoral schools concentrate on the suitability of the teaching and learning methods for meeting the professional expectations of students, frequency of meetings with PhD supervisors, scientific/artistic results, and impartiality of the assessment process. In the MAB-WFME accreditation of medical education explicit attention is given to the pedagogical methodologies that encourage the active involvement of students in the process of learning and that help them complete a programme successfully.

ESG 1.4 Student admission, progression, recognition and certification

The criteria used by the agency in all EQA procedures address ESG I.4 but with a different focus and extent. Ex-ante programme evaluation covers just the planned number of students. In ex-ante institutional evaluation and ex-post institutional accreditation, the focus is on the quality of the processes for admission and for supporting the progress of students, recognition of prior learning (including informal and non-formal) and awarding qualifications. In the ex-ante evaluation of doctoral schools and the ex-post accreditation of doctoral schools, the focus is on admission requirements, the examination of the existence of clear and precise requirements related to the acquisition of a degree, and credit recognition for research activities conducted abroad and/or for participation in mobility programmes. In the MAB-WFME accreditation of medical education, the focus is on policies and procedures for admission, selection of students and rules on transfer from other schools or programmes. Recognition of prior learning, especially for the informal and non-formal learning, is not explicitly mentioned. Therefore, the panel recommends the agency to fully address the effectiveness of this standard in the revision of ex-ante programme evaluation and WFME accreditation.

ESG 1.5 Teaching staff

In all the criteria used by the agency this standard is strongly addressed. In ex-ante programme evaluation, ESG 1.5 is especially emphasised through a focus on the number of professors and the professional competences needed for launching a new programme. In ex-ante institutional evaluation and ex-post institutional accreditation, it is covered through the assessment of how the composition of the teaching body, the possibilities for the professional development of educators and the evaluation of their performance are aligned with the institution's goals and policies. In the ex-ante evaluation of doctoral schools and in the ex-post accreditation of doctoral schools, the focus is on the activities and workload of professors, supervisors and the professional competences needed for participating in doctoral training/supervising. MAB-WFME criteria also put a great focus on the selection, performance and development of academic staff and supervisors in clinical practice.

ESG 1.6 Learning sources and student support

In the criteria implemented by the agency in its evaluation procedures this standard is strongly addressed. In ex-ante programme evaluation, the infrastructural conditions needed for starting a programme are given special consideration. In ex-ante institutional evaluation and ex-post institutional accreditation, emphasis is also put on funding and support offices for the students. In the ex-ante evaluation of doctoral schools and the ex-post accreditation of doctoral schools, additional focus is given to the infrastructure needed for doctoral training, the quality of academic administration services, and financial support to doctoral students. In the MAB-WFME accreditation of medical education, the focus is also on the infrastructure needed for clinical practice.

ESG 1.7 Information management

Collection, analysis, and use of relevant information for effective management are addressed in the criteria for ex-ante institutional evaluation, ex-post institutional accreditation, ex-ante evaluation of doctoral schools and ex-post accreditation of doctoral schools. In the criteria implemented in the MAB-WFME accreditation procedure of medical education and in the ex-ante programme evaluation information management is not explicitly mentioned. Therefore, the panel recommends the agency to fully address the effectiveness of this standard in the revision of ex-ante programme evaluation and WFME accreditation.

ESG 1.8 Public information

Updated publishing of clear and objective information about HEIs and programme activities is addressed in the criteria used for ex-ante institutional evaluation, ex-post institutional accreditation, ex-ante evaluation of doctoral schools and ex-post accreditation of doctoral school. In the criteria implemented in the MAB-WFME accreditation of medical education and in ex-ante programme evaluation the focus is on the public availability of the programme and its features.

ESG 1.10 Cyclical external quality assurance

All criteria used by the agency in all its EQA procedures address ESG 1.10. The focus is different depending on the type of procedure (new programme, institution, doctoral school, and medical programme).

Based on the analysis provided, the review panel can confirm that MAB addresses the ESG part I in its EQA procedures. These standards are translated into the criteria used by the agency in its Rules of Procedure, Guides, Evaluation Sheets and Self-Assessment Report Templates. Standards are also included in the training materials for experts to ensure appropriate interpretation. The panel recognises the agency's efforts and commitment to disseminating the ESG by dialogue and communication with stakeholders. As indicated under ESG 3.4, more thematic analyses are needed to obtain relevant information on the quality of the institutions and programmes accredited at the system level.

As already explained (in ESG 3.1, see also ESG 2.2), MAB is now working on simplifying the initial evaluation of programmes, designing the ex-post evaluation of programmes in study fields, and merging the accreditation of doctoral schools with institutional accreditation. As a part of these changes MAB is developing new sets of criteria in compliance with the ESG. Because this process still needs to be completed, the effectiveness of the IQA mechanism to be used cannot yet be critically assessed.

Panel commendations

3. The panel commends the agency for its efforts and commitment to disseminating the ESG by dialogue and communication with stakeholders.

Panel recommendations

9. The panel recommends the agency to fully address the effectiveness of all the standards described in Part I of the ESG in its ongoing and new procedures, and make sure that stakeholders continue being familiar with them. The panel especially refers to ESG I.4 and ESG I.7, which need to be fully addressed in ex-ante programme evaluation and MAB-WFME accreditation.

Panel conclusion: compliant

ESG 2.2 Designing methodologies fit for purpose

Standard:

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

2018 ENQA review recommendations

The panel recommends that the practice of evaluating doctoral schools every six months be discontinued. It is unnecessary, time consuming, and resource consuming. If this practice remains, the panel is of the opinion, with which the HAC agrees, that it should be the mission of the National Doctoral Council and not the HAC to assess the qualifications of the faculty in doctoral schools. In order to ensure effectiveness, the panel also recommends that the HAC considers including the evaluation of doctoral schools with the institutional evaluation procedure.

On another level, the panel recommends that non-academic stakeholders, e.g., representatives of civil society, labour unions, entrepreneurs and regional/local authorities, together with international experts be consulted and involved in the design and improvement of the QA procedures of the HAC.

Evidence

The examination of the number of procedures completed by MAB from 2018 to 2022 (see section on "MAB's Functions, Activities, Procedures") indicates that most work was invested in the ex-ante evaluation of programmes (534 evaluations in total), and in the ex-ante evaluation and ex-post accreditation of doctoral schools (175). Due to the pandemic, MAB switched to online institutional accreditation procedures; in total, 17 processes were conducted online. During this period, 78 evaluations of programme and learning framework requirements were conducted, along with 51 expost accreditations of existing HEIs and 2 accreditations of medical schools (in 2021). No ex-ante evaluations of new institutions took place. Monitoring took place in 2 ex-post accreditation processes: 14 HEIs and 6 doctoral schools (in 2022) were monitored.

As indicated above (see also ESG 3.1.), MAB conducts various types of EQA procedures, but the procedures and methodologies have been constantly monitored and reconsidered. Some revisions of methodologies have been implemented recently and some are still in progress. Such revisions have been encouraged by legislative changes and by the agency's striving to make the methodologies more efficient and fit for purpose.

As has been already explained in this report (see ESG 3.4.), MAB initiated a thematic analysis conducted by PricewaterhouseCoopers (PwC) in 2020. The analysis examined stakeholders' satisfaction with MAB's EQA procedures. The main findings indicated that renewed ex-post institutional accreditation had been most welcomed by HEIs while ex-ante programme evaluation resulted in the lowest stakeholders' satisfaction. The president of the agency also informed the panel about recent legislative changes adopted in December 2022, according to which, once a HEI is accredited, it can launch a new master programme without ex-ante programme evaluation (except for master programmes in teacher training and in the field of public administration). Following these findings and recent legislative changes, the agency is trying to move towards ex-post accreditation and is putting the focus on institutional expost accreditation.

At the same time, in the frame of the sectoral modernisation project (RRF, see details of this project in "Higher Education System" above), MAB has started to revise and simplify ex-ante programme evaluation and is developing ex-post programme accreditation based on study fields. The SAR makes explicit reference to MAB's "plans to discontinue the current ex-ante procedure (and replace it with a shorter ex-ante programme registration process) and to develop ex-post programme accreditation procedure based on study fields" (SAR, 63.). The revised ex-ante programme evaluation is planned to start in September 2023 and the purpose of the ex-ante evaluation of both learning outcome requirements and of programmes is the licensing of new programmes. The development of ex-post programme accreditation based on study fields is planned to start in April-May 2023 and finish on June 30. The latter includes ESG I-I0 and integrates micro-credentials. To ensure effectiveness and consistency, in 2020 the MAB Board decided to set up:

- a Multidisciplinary Committee in charge of addressing the launch of programmes involving more than two disciplines, and
- a College for Programme Accreditation Committee, to ensure the "uniform application of the MAB criteria in the procedures for launching a programme, and coherence in the content of the evaluations" (SAR 38).

Following the 2018 ENQA review recommendation to rethink the model of doctoral school accreditation, especially to discontinue the practice of evaluating doctoral schools every six months and to consider including the evaluation of doctoral schools with the institutional evaluation procedure, MAB has been working on implementing changes in this regard. In 2019, the new ex-post accreditation of doctoral schools in five-year cycles was introduced. The procedure and criteria also apply to the ex-ante evaluation of doctoral schools. This new process includes a site visit and follows the ESG part 1. The former evaluation of doctoral schools every six months was a desk-based exercise that only assessed whether the number of staff and their qualifications met the requirements for doctoral schools. It was too onerous for the agency and for the institutions, and "did not in every aspect provide feedback on the quality of the doctoral school" (SAR 37). The ex-post accreditation of institutions and of doctoral schools requires that the review teams assess compliance with the standards defined by the agency and the effectiveness of IQA systems. Since the goals of both processes are interconnected, MAB is elaborating a method to merge procedures and to combine ex-post institutional accreditation and ex-post doctoral school accreditation in a single procedure. It was confirmed during the discussion with MAB's College for Doctoral Accreditation that this body has a crucial role in planning the improvements of doctoral school accreditation.

The two medical schools that have participated in the evaluation process against the MAB-WFME standards have been accredited for eight years. Two other medical schools will go through the procedure in 2023. This accreditation grants recognition status from the WFME, encourages the competitiveness of medical education in Hungary and promotes internationalisation.

In 2021, MAB conducted the cross-border accreditation of the Ferenc Rakoczi II Transcarpathian Hungarian College of Higher Education in Beregovo, Ukraine. This is the agency's only cross-border activity since the last ENQA review. This cross-border activity was conducted in accordance with the standards and requirements applied in the ex-post accreditation of Hungarian HEIs. MAB's plans are to conduct accreditation in Malta and to "actively use the European approach and participate in the evaluation(s) of EUI alliances" (SAR 18).

During the site visit the panel confirmed that MAB regularly collects feedback through surveys, questionnaires, meetings, focus group discussions and project activities to evaluate the performance of its evaluation/accreditation procedures, update methodologies and set up new ones. From the meeting with the Expert Committees responsible for special tasks (for programme accreditation, doctoral accreditation, QA, Development and Strategy), the panel learned that stakeholders were included in the preparation of the strategic plan and action plan. Representatives of universities informed the panel that MAB has good communication with HEIs. For their part, experts reported that they feel well prepared for the visits due to training. To the panel they seemed very knowledgeable of the guidelines for institutional and doctoral accreditation. Mention should be made of the agency's intention, as expressed by the president, to put higher emphasis on expertise in HE pedagogy (learning and teaching). This is supported by the panel.

Analysis

The panel can ratify that for each evaluation/accreditation activity MAB has defined specific objectives and established clearly delineated methodologies fit for purpose. Since 2018, based on internal QA findings and recommendations, the agency has bettered its practices. As an example, it has discontinued the evaluation of doctoral schools every six months and is working on including the accreditation of doctoral schools within the institutional accreditation procedure, simplifying ex-ante programme evaluation, and developing an ex-post programme accreditation based on study fields. In this respect, the panel commends the agency for making an effort to better adjust its EQA scheme and make procedures more fit for purpose. The panel also encourages MAB to continue streamlining and simplifying its EQA procedures.

As to the 2018 ENQA panel's recommendation that the agency consults with non-academic stakeholders and international experts in the design of its QA procedures, it is clear to the panel that MAB is making the effort. The panel encourages the agency to continue the effort of developing procedures with the assistance of stakeholders, especially non-academic stakeholders and international experts.

Panel commendations

4. The panel commends the agency for making an effort to better adjust its EQA scheme and make procedures more fit for purpose.

Panel suggestions for further improvement

- 6. The panel encourages MAB to continue simplifying, harmonising, and streamlining its processes.
- 7. The panel encourages the agency to continue the effort of including non-academic stakeholders and international experts in its consultation procedures.

Panel conclusion: compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

Evidence

The EQA processes of the agency are pre-defined and published on the website. For the ex-ante accreditation of VET, Bachelor and Master Programmes, the agency has published degree programme guides, criteria, and evaluation templates. Among other documents, for the accreditation of institutions, doctoral schools and medical programmes, the following are available: Scope of Accreditation in Institutional Accreditation Procedures by MAB, Rules and Procedures of the College for Doctoral Accreditation, MAB's Standards for Medical Education and MAB's Rules of Procedure for the Accreditation of Medical Education.

The ex-ante procedures of new institutions, programme and learning outcome requirements as well as the ex-ante evaluation of programmes are conducted through the TIR 2.0 database (SAR 39). The procedures include the opinion (report), prepared according to detailed application criteria determined by MAB, of two expert evaluators proposed by the appropriate discipline-specific expert committee and appointed by the agency. If the two evaluators arrive at contradictory conclusions a third expert is invited to assess the application. Evaluations are sent to the appropriate discipline-specific expert committee for discussion "and forwarded to the MAB Board for further discussion and decision making" (SAR 40). A follow-up is not included in these procedures.

In the ex-post accreditations of higher education institutions, a self-assessment report is prepared based on MAB's guidelines and is submitted to the site visit teams. "Site visit teams conduct face-to-face or online site visits, which may take one to three days (in extreme cases five days) for institutions, depending on the size and complexity of the HEI" (SAR 40). After the visit, the team prepares a draft report that is sent to the rector for factual comments, then to the relevant discipline-specific expert committee and, finally, to MAB's Board for a decision. "Each evaluation report includes recommendations for improvement and may contain conditions to be met within a specified timeframe, usually one to two years. Institutions are required to submit either an activity plan or a description on actions taken on the MAB's recommendations, and in some cases, MAB decides to conduct a site visit to monitor them. The submitted descriptions or action plans are discussed by the action plans" (SAR 40).

In the ex-ante evaluation and the ex-post accreditations of doctoral schools, the procedure and criteria are like the ones used for institutional accreditation, however, the site visit takes one day (or two days if it is necessary due to scheduling difficulties). "The completed draft report is reviewed by an invited member of the College for Doctoral Accreditation for the purpose of providing advice to the site-visit team and ensuring the consistency of the report. After incorporating their comments, the report is sent to the head of the doctoral school for factual comment, and then to the College for Doctoral Accreditation. Finally, the report is forwarded to the MAB Board together with the Doctoral School's

comment for a final decision on the accreditation" (SAR 41). The monitoring process is the same as in ex-post institutional accreditation.

For the accreditation of medical schools, the self-evaluation report is prepared according to MAB's Standards for Medical Education. The site visit takes between three and five days. The team interviews "the school's leadership, the persons responsible for QA, heads of institutes, lecturers, staff providing educational support, and students." The team "also inspects the medical school's infrastructure" (SAR 42). The report is sent to the medical school for factual comment, to the Committee of Medical and Health Sciences for approval and, eventually, to MAB's Board, who will decide on accreditation. Follow-up is also included but is slightly different depending on the outcome of the process. Each medical school will prepare a report in the first half of the accreditation period, informing on its activities, changes, modifications, and developments. In the case of conditional or limited accreditation, a follow-up will be carried out on a predetermined date within the validity period of accreditation (see also ESG 2.5.). Since the language of this procedure is either Hungarian or English, MAB's Standards for Medical Education are available in both languages on the agency's webpage. The accreditation decision is also prepared both in English and in Hungarian. In relation to this, the president informed the panel that it is the intention of the agency to also introduce English in institutional and doctoral accreditations.

Analysis

The review panel can confirm that MAB's EQA processes are predefined, published and implemented consistently. They include all four procedural steps except in the case of ex-ante programme evaluations which, due to their specific character, do not include a site visit nor a follow-up phase. Therefore, the panel would recommend the agency to include a consistent follow-up in the renewed ex-ante programme evaluations.

For further improvement, the 2018 panel suggested lengthening the site visits in institutional evaluations to allow sufficient time for meetings and in-depth discussions with the different groups of interviewees. Upon the request of the current panel, the agency submitted the accreditation schedules for the ex-post procedures. Based on the information in them and in the SAR, the panel confirms that site visits have been lengthened. For visiting team members and external experts the duration of site visits was sufficient to delve into the workings of institutions. For their part, rectors and vice-rectors commended the fluidity of the process, professionalism of interviews and the internal consistency of reports.

As to follow-up procedures, in the case of medical schools, the institution is to prepare a report four years (or shorter in the case of conditional or limited accreditation) after having been accredited. In the case of institutions and doctoral schools an interim report on progress and results achieved is only needed when compliance with standards is not absolute and recommendations are given. The statistics included in the section "MAB's Functions, Activities, Procedures," and examined under ESG 2.2 indicate that monitoring processes are in place but can be improved so that universities and PhD schools that fully comply with the criteria defined by the agency do submit a follow-up report. The panel suggests that the agency implements consistent follow-up and monitoring strategies for institutions and doctoral schools that fully comply with criteria, as it believes that they will be useful to improve their internal quality.

Panel recommendations

10. The panel recommends the agency to include a consistent follow-up in the renewed ex-ante programme evaluations.

11. The panel recommends that the agency implements consistent follow-up strategies for institutions and doctoral schools that fully comply with criteria, as it believes that monitoring will be useful to improve IQA performance.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2018 ENQA review recommendations

The panel recommended:

- Giving up anonymity and invisibility of its experts for ex-ante procedures to protect the accountability and transparency of the system. It is essential that reports include the names of the experts involved. This will increase the trust of the public in the agency.
- That foreign experts are included not only in the evaluation of religious programmes, foreign-language universities, and doctoral schools but in all visiting panels and disciplinary committees. It is important to rely on outside QA experience for comparative analysis and exchange of good practices.
- That students are included in all ex-ante evaluations and are actively involved in all processes and decisions.
- That the HAC increases the volume of training of experts and standardises the method of training according to the purpose and type of the evaluation activity.

2019 EQAR RC's conclusion: "[...] The Register Committee welcomed HAC's decision to lift the anonymity of experts [in case of ex-ante procedures] and acknowledged HAC's intention to address the involvement of students in its follow-up report to the coordinator. The Committee nevertheless noted that such changes are yet to take place, and underlined that students should be appropriately involved in all peer expert groups, including the ex-ante evaluation stage as per the requirement of the standard."

Evidence

Selection of experts is regulated in the agency's By-Laws of January 30, 2015. In Section III. 4.3. it is stated that: "Evaluators shall be selected from the [the agency's] database of experts by the President of the [MAB], by its Vice President upon authorisation of the President, by the chairs of [discipline-specific] committees (or, if the chair is prevented from acting or is involved in the matter at hand, by the co-chair or, if such co-chair is prevented from acting or is involved in the matter at hand, by a non-involved member suitable for the field concerned)." During the site visit the panel confirmed that experts are carefully selected on account of their credentials and qualifications and are included in the pool. The panel learned that inclusion in the pool is done by referral or invitation and that there is no public open call for reviewers. Reviewers are required to sign a statement confirming no conflict of interest with the institution/programme undergoing evaluation and are expected to familiarise themselves with the agency's Code of Ethics.

According to Act CCIV of 2011 on National Higher Education "the identity of participating experts" in the evaluation and accreditation procedures of MAB must be "publicly available" (XVIII.41,70). In this respect, the SAR states that: "The anonymity of the ex-ante experts of MAB has been discontinued" (58), following the ENQA Board's decision of February 2019. During the meeting with the Expert Committees for disciplines and with reviewers, the panel ratified this information.

In ex-ante evaluations, where no site visit is carried out, two experts with knowledge of the field conduct the assessment. It is important to say that in these ex-ante procedures foreign experts are not invited to participate because they are not "familiar with the programme and learning outcomes requirements," which "are not available in foreign languages" (SAR 45).

In ex-post institutional accreditation, the ex-ante evaluation of doctoral schools and ex-post doctoral accreditation, and the accreditation of medical schools a visit is carried out. The composition of visiting teams is described in the agency's By-Laws. According to section III. 4.2.1. titled "Visiting Committees," the chairperson is proposed by the president of the agency and elected by the simple majority of the members of the Board present. The chairperson proposes a list of members for the visiting team. Each team has a member who is a quality assurance expert and a member who is a student. Clearly, "members shall not include individuals employed by or being in a contractual relationship involving financial compensation with the institution concerned, or individuals who, for any other reason, cannot be expected to deliver objective judgement in the matter." Members are elected by the Board, who votes on the list proposed by the chairperson, with a simple majority of the votes of the members present.

During the site visit, the panel learned from the Secretariat that in ex-post institutional accreditation a site visit team usually has 5-6 members, with possible additional members in case of larger HEIs (up to 17 members). The team consists of a chair, a QA expert, an academic expert or a stakeholder, a student representative, and a MAB's programme officer who coordinates the review process. In the ex-ante evaluation of doctoral schools and ex-post doctoral school accreditation, site visit teams usually consist of 5 members. The criteria and process for the selection of site visit teams and experts in the accreditation of doctoral schools are included in the Rules and Procedures of the College for Doctoral Accreditation. As it is, site visit teams always include an academic expert, or else a stakeholder, a HE QA expert, a PhD/DLA student recommended by DOSZ and a MAB's programme officer. The panel learned from reviewers that in ex-post institutional and doctoral school procedures, foreigners are not always included. By the agency's admission, "their number is still low" (SAR 45). MAB's intentions are to increase their number and "to involve at least two foreign members in the site visit team to add international perspective and expertise in the implementation of the process" (SAR 44). Within MAB's plans is also the engagement of a higher number of industrial experts in institutional accreditation (SAR 43).

In the accreditation of medical schools based on the WFME standards, the site visit team is composed of 6-8 experts: "two or three of them shall have an important and active role in the work of domestic and/or international providers of theoretical and practical medical education and are actively involved in domestic and/or international research" (SAR 44), two of them are QA experts, one is a student, and one is a MAB's officer. The criteria and process for the selection of site visit teams and experts in the accreditation of medical schools are included in MAB's Rules of Procedure for the Accreditation of Medical Education.

At present, student members (delegated by HÖOK, DOSZ, and more recently also by the European Students' Union for the accreditation of medical programmes) are full members of expert committees and site visit teams. Currently, they are not included in the preparation of ex-ante programme evaluations. In this activity experts are required to make judgements based on their teaching and

professional experience and students "do not possess the expertise and knowledge required for this task" (SAR 43).

Students' training is organised by HÖOK or DOSZ (two days). MAB provides training for all experts but students, in all EQA procedures except for ex-ante programme evaluations. Experts participating in ex-ante evaluations explained to the panel that they receive the guidelines on what the focus is and the information that needs to be provided as evidence, and that they evaluate accordingly. They considered, though, that it would be useful to receive some kind of training or, at least, organise a roundtable or workshop for experts so that they learn from each other.

For the ex-post accreditations of HEIs, experts are trained in preparatory meetings which examine the assessment procedure and define the tasks and responsibilities of team members. Meetings "include discussions focusing on the MAB criteria, ESG standards, analysis of the institution's self-evaluation report, questions to be clarified, and materials to be submitted before the visit and on site" (SAR 44). The content of this training is like that given for the accreditation of doctoral schools (exante and ex-post). In the latter, however, training is "organised in clusters for several site-visit teams" (SAR 45). In the accreditation of medical schools based on WFME standards, the expert team is trained before the site visit with a focus on standards, preparation of report, tasks, and responsibilities.

Analysis

The panel can confirm that MAB's EQA activities are carried out by groups of external experts that include one student member, except in the case of ex-ante programme evaluations where a student member is not included.

The panel acknowledges that the 2018 recommendation that MAB gave up the anonymity of its experts has been followed. The panel understands that experts are carefully selected, but still the selection criteria are not always public. Nor is there a public call for experts. The panel recommends, therefore, that the agency publishes the criteria and the process for the selection site visit teams and experts in ex-post institutional accreditation and ex-ante programme evaluation procedures. In addition, the panel suggests that an open call for experts be issued on the agency's website to continue developing a diverse list of potential candidates.

Under ESG 3.1, it was explained that part of the strategic plan of the agency is to involve more foreign experts in its procedures and it was suggested that MAB continues finding ways to engage them. Likewise, it was suggested that the agency continues recruiting non-academic stakeholders. As to students, the panel notes that changes are yet to take place but recommends that students be appropriately involved in all the activities of the agency.

Since 2018 there has been no change in the training of evaluators. Training for ex-ante programme evaluations continues to be absent and insufficient. MAB is aware of this situation and needs to organise a training system for these ex-ante activities. In this respect, the panel recommends that the agency strengthens the training of experts, includes training in all EQA activities, and adapts it to the specifics of different procedures.

Panel recommendations

- 12. The panel recommends that the agency publishes the criteria and process for the selection of site visit teams and experts in ex-post institutional accreditation and ex-ante programme evaluation procedures.
- 13. The panel recommends that students are included in all EQA activities of the agency including ex-ante programme evaluations.
- 14. The panel recommends that the agency strengthens the training of experts, includes training in all EQA activities, and adapts it to the specifics of different procedures.

Panel suggestions

8. The panel suggests that an open call for experts be issued on the agency's website to continue developing a diverse list of potential candidates.

Panel conclusion: partially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

The evaluation/accreditation activities conducted by MAB are based on explicit criteria published on the agency's website (see ESG 2.1 and ESG 2.3). MAB strictly applies the criteria described in the self-evaluation templates and procedural guidelines. These documents contain detailed explanations of each criterion and standard and inform of the requirements and evidence to be provided.

Besides using templates for self-evaluation and publishing procedures, the agency ensures that criteria are consistently interpreted and that protocols are applied coherently and in a transparent manner through:

- Training sessions for the experts participating in site visits.
- Consensus through a third expert in ex-ante activities in case that the two evaluations diverge.
- Presence of a programme officer from MAB in each review.
- The College for Programme Accreditation Committee, the College for Doctoral Accreditation and the Committee for Medical and Health Sciences, which are responsible for second level evaluation prior to the Board's decision and verify the consistency of the reports produced by the expert panels.
- Discipline-specific Expert Committees, which are decision preparatory bodies to MAB's Board.

Depending on the EQA system, outcomes take different forms. In the ex-ante evaluations, the outcome may result in an "approved" or "not approved" decision by MAB's Board. For institutional and doctoral schools' ex-post accreditation, five different outcomes are possible: accreditation for a maximum of five years; accreditation for a maximum of five years with a required interim report on progress and results achieved; accreditation for a maximum of five years with a required follow-up report on progress, results achieved and interim site-visit; accreditation for less than five years (in the case of a higher number of partial and/or non-compliance); and suspension of the accreditation process (in the case of severe non-compliance). For accreditation of medical schools based on WFME standards, possible outcomes are: full accreditation for a maximum period of eight years; conditional accreditation for a period of eight years with the obligation to submit a progress report on a predetermined date; and limited accreditation for a period of eight years or shorter with the obligation for a follow-up procedure on the predetermined date (there are clear rules for each of these outcomes based on the standards' assessment, which might be compliant/partially compliant/non-compliant). As seen in the "Introduction," in the table showing the number of procedures completed by MAB in the

last five years, the outcome was rejection in 19 procedures conducted at the institutional level and in 298 procedures conducted at the programme level (260 procedures in ex-ante programme accreditation resulted in rejection).

Analysis

During the site visit, the panel was able to confirm that the criteria for evaluation/accreditation procedures are public and accessible in Hungarian. MAB-WFME evaluation support documents and criteria are available in Hungarian and English. Representatives from the universities appreciated the clarity of the criteria used by MAB. They were satisfied with the guidance provided by the agency and with the evidence given by MAB to support its decisions and recommendations. They informed the panel that the agency not only influences HEIs but also motivates them. Based on discussions with different stakeholders, the panel is also convinced that the measures taken by the agency to ensure consistency are well-targeted and yielding results.

For further improvement, the 2018 panel had two suggestions:

- To ease external QA of joint programmes, it suggested that MAB adopted the procedures of the present European Approach for Quality Assurance of Joint Programmes.
- To facilitate the navigation of institutions through laws, decrees, standards, and guidelines, it suggested that MAB issued a guidebook that compiled all the relevant information.

As to the first suggestion, the current panel verified with the agency that for joint programme accreditation, of which MAB has no experience yet, it will adopt the European approach and will conduct international training. As to the second suggestion, the current panel considers that it is important for stakeholders to keep an overview of the legislation and all processes in the system to continue developing a QA mindset and identify room for improvement. The panel, therefore, follows up on the 2018 suggestion that MAB considers issuing a guidebook compiling all the relevant information in Hungarian and English.

Panel suggestions for further improvement

9. To continue developing a QA mindset and to facilitate the navigation of institutions through laws, decrees, standards, and guidelines, the panel suggests that MAB issues an easy-to-use guidebook that compiles all relevant information on EQA processes and methodologies in Hungarian and English.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

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

Evidence

Reports for ex-ante programme evaluations and for ex-ante programme and learning outcome requirements evaluations are prepared in a MAB's template. They "include the evaluators' judgments on whether the applicant fulfils the different criteria of the procedure, and an explanation of their findings and procedures" (SAR 49). Two experts separately produce a report, which includes their

own opinion, by filling in the template. These experts' reports are discussed in the relevant disciplinespecific expert committee, which prepares a decision proposal for MAB's Board with a justification consolidating the experts' reports, summarising their main findings. Ten working days after MAB's Board takes its decision, decisions and justifications for those decisions (consolidated reports) are sent to the applicant by the Secretariat. All decisions and consolidated reports are published on the agency's website. The separate experts' full reports prepared in the MAB's template are available in the TIR database but are not published on the agency's website. As no ex-ante evaluation of institutions has been conducted in the last five years, no reports have resulted from these procedures.

For writing the report of an ex-post accreditation activity (institutional accreditation, doctoral school accreditation and medical school accreditation based on WFME standards), the site visit team is presented with a template that follows the provisions of the guides and rules of procedure. Reports include a description of the context and the method, the persons involved, an analysis of each standard and the evidence to support main findings. Experts are instructed to highlight good practices and make suggestions for improvement. After the site visit, the team sends the report to the HEI to correct errors of fact. "The final report contains a statement [produced by MAB's Board] on the deadline for actions to be taken and when the follow-up evaluation will be conducted" (SAR 49).

While all panel members in all EQA procedures, except for ex-ante programme evaluation (where experts' reports are prepared separately), contribute to drafting the report, responsibility "for collecting the designated parts of each member's report" rests on the chairs of the site visit teams (SAR 49). The agency's programme officers make sure that all criteria are tackled in the report and that evidence is used to provide support for the conclusions, but they also participate in writing some parts of the report (see also ESG 3.5.) All reports on the accreditation of institutions and doctoral schools along with consequent decisions are posted on the agency's website and uploaded to the EQAR database (DEQAR). Reports on medical education and decision documents are published together in English on the agency's website and are uploaded to DEQAR.

Analysis

It was noticeable to the panel that the Hungarian website is well structured and that there have been improvements in the English version since the last review. The panel analysed different reports, in Hungarian and English, and was able to conclude that their format is clear. Following up on the interviews, the panel is convinced that the content of the reports is the result of the independent work of experts and that the academic community finds them useful.

As already explained, because of the legal change taking place in 2022, MAB is closing the ex-ante programme evaluation and is developing a new model. Therefore, the panel would strongly encourage the agency to reconsider the current model according to which two experts produce separate reports by filling in a template and, based on them, a justification/consolidated report is issued and published together with the Board's decision while the separate experts' templates are not published. Full expert reports should be published and accessible to the academic community and the wider public. Therefore, the panel recommends that within the new model of programme evaluation the reports by experts are published in full.

In 2018 the ENQA review panel suggested that, given the extension of the reports issued for institutional and programme cluster accreditation, MAB prepared an executive summary of each visit easily accessible to the public in terms of language and outcomes. Since the last review, no reports have been issued for programme cluster accreditation (the process was discontinued in 2018). Concerning reports for institutional accreditation, in cases when the decision document of the Board covers the main formal outcomes of the assessment, the said document can be considered an executive summary. Still, the panel endorses the suggestion that MAB publishes a brief and easy-to-read overview of all EQA processes and their main points, highlighting the necessary facts and

contents. Likewise, the panel suggests that the summary be in English to foster the internationalisation plan of the agency.

Panel recommendations

15. The panel recommends that within the new model of ex-ante programme evaluation the reports produced by experts are published in full. Full reports should be published and accessible to the academic community and the wider public.

Panel suggestions for further improvement

10. For further improvement, the panel suggests that MAB prepares an executive summary of each visit easily accessible to the public in terms of language and outcomes. The panel also suggests that the summary be in English to foster the internationalisation plan of the agency.

Panel conclusion: partially compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

2018 ENQA review recommendations

The panel recommends that the HAC develops a policy of complaints and communicates to the public.

2019 EQAR RC's conclusion: "[...] The Register Committee welcomed the plans of HAC to introduce a separate complaints procedure, but the Committee found that as it stands the agency does not have a clearly defined complaints policy."

Evidence

MAB's Board of Appeals and Complaints (BAC) was established in compliance with Government Decree 19/2012 of 22 February 2012 and with Act CCIV of 2011. It consists of three members nominated by the Minister responsible for HE and appointed by the Prime Minister. The members elect their president from among themselves. Although there are no defined and published criteria for their selection, nomination, or appointment, current members of the BAC, with whom the panel met during the site visit, are highly recognised representatives of the academic community. To ensure continuity of work, members are delegated for a period of six years (renewable once) and are supported by a MAB's officer. "The Rules of Procedure of the BAC are available on the MAB website in Hungarian, including its principles, the types of appeals handled by the BAC, the composition of the BAC and the detailed description of the procedure for the appeal" (SAR 52). Students are not involved in the process, and interviews with the members of the BAC confirmed that they do not see reasons for involving students.

The appeals process is different from the complaint process. Requests for appeals are submitted by the rector of a HEI. "Appeals concerning new programmes must be submitted to the Educational Authority," who then requests "an evaluation procedure from MAB" (SAR 52). In all "other cases appeals may be submitted directly to MAB" (SAR 52). The BAC either grants the appeal and annuls the decision of MAB's Board or upholds the decision of MAB's Board. The appeals policy is published on the agency's website in Hungarian.

Complaints "may be lodged by any person" (SAR 52). On September 25, 2020, the agency issued a Complaints Management Policy (available in English), posted on the web, "aimed at strengthening user trust and creating clear and effectively structured internal rules that enable the communication of issues regarding procedures where such issues cannot be the basis of a formal appeal" (cited from the Policy, I). The Policy contains information on the process of submission and the rules for handling complaints. The process is clear: complaints are addressed to MAB's Secretariat, who verifies that they meet the formal requirements and forwards them "to the officer of the BAC [MAB's staff member], who examines the content of the complaint and prepares a report. Depending on the nature of the complaint, the report is sent to the BAC or the MAB Ethics Committee for a decision" (SAR 52). The case is decided by the Ethics Committee when the complaint concerns the action of a natural person on the basis and in line with the rules of procedure specified in MAB's Code of Conduct (Complaint Management Policy of the Hungarian Accreditation Committee, adopted through Decision 2020/8/VII/2 of the Body of the Hungarian Accreditation Committee).

Upon the request of the panel, MAB provided the following table with the number of appeals processed by the agency from 2019 until October 2022, when the SAR was submitted.

Year	20	19	202	20	202	21	202	22
Type of decision	Approved	Rejected	Approved	Rejected	Approved	Rejected	Approved	Rejected
Programme launch Doctoral school	4	7	4	26	I	2	2	4
Cases	I I	2	3	2	0	2	0	I
Total	5	9	7	28	Ι	4	2	5

The increase in the number of appeal cases in 2020 was due to inaction between the expiration of the mandate of the previous BAC in 2019 and the appointment of the new one. Since the last review only three complaints were lodged. One ended with the reassignment of a member of the discipline committee involved and a letter of warning. Two are currently in process, under the consideration of the agency's Ethics Committee.

Analysis

The agency's appeals procedure is well established and available on the website. The panel notes that the number of appeals is very low. The fact that representatives of universities knew about the possibility of submitting appeals and that they appreciated the channels of communication opened between the agency and HEIs leads the panel to conclude that issues are solved before they can become grounds for an appeal.

The panel also notes that a complaints procedure is currently in place. The procedure is clear and available on the website. The panel therefore concludes that the 2018 review recommendation to develop and make public a policy of complaints has been adequately addressed by the agency.

Yet, the panel recommends that MAB publishes the criteria for the selection, nomination, and appointment of the members of the Board of Appeals and Complaints. In addition, the panel suggests that MAB considers including a student in the BAC. The panel believes that ensuring the involvement of a student would enhance the quality of the process.

Panel recommendations

16. The panel recommends that MAB publishes the criteria for the selection, nomination, and appointment of the members of the Board of Appeals and Complaints.

Panel suggestions for further improvement

11. The panel suggests that the agency involves students in the Board of Appeals and Complaints to enhance the quality of the appeals and complaints procedures.

Panel conclusion: compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE

- 1. The panel commends the agency for changing its role from service enforcer to service provider.
- 2. The panel commends the idea of Advisory Boards that serve to provide recommendations and guidance to the agency.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

3. The panel commends the agency for its efforts and commitment to disseminating the ESG by dialogue and communication with stakeholders.

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

4. The panel commends the agency for making an effort to better adjust its EQA scheme and make procedures more fit for purpose.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

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

ESG. 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE

1. The panel recommends the agency to simplify its structure and transition to a more horizontal organisation, with fewer hierarchical levels, to increase efficiency.

ESG 3.3 INDEPENDENCE

- 2. The review panel recommends that MAB explores additional ways to strengthen its organisational independence, especially regarding a more balanced representation of the nominated delegates to MAB's Board so different groups of stakeholders can be adequately represented.,
- 3. The review panel recommends that MAB defines clear and transparent rules and criteria for selection, appointment, and dismissal procedures for its Board members so that the most competent candidates can be chosen without any governmental interference and the possibility to dismiss members without a limited set of reasons decreases. MAB might use the opportunity of the RRF project currently underway to suggest necessary legislative changes in this direction.

ESG 3.4 THEMATIC ANALYSIS

- 4. The panel recommends that the agency continues gathering qualitative data and exploits the full potential of collected data and findings from EQA activities to regularly conduct and publish thematic analysis at the system level.
- 5. The panel also recommends that the agency devises a plan for conducting thematic analyses within its changing EQA processes to ensure regularity and for implementing a systematic approach to selecting the themes of the thematic analyses.

ESG 3.5 RESOURCES

- 6. The panel encourages the agency to be mindful of the workload of the Secretariat and reconsider their participation in expert committees as just coordinators rather than expert members.
- 7. The panel encourages the agency to involve the members of its Secretariat in conducting thematic analyses.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

8. The panel recommends that the agency ensures that students are included in providing their feedback and are informed of the improvements and developments resulting from surveys.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

9. The panel recommends the agency to fully address the effectiveness of all the standards described in Part I of the ESG in its ongoing and new procedures, and make sure that stakeholders continue being familiar with them. The panel especially refers to ESG 1.4 and ESG 1.7, which need to be fully addressed in ex-ante programme evaluation and MAB-WFME accreditation.

ESG 2.3 IMPLEMENTING PROCESSES

- 10. The panel recommends the agency to include a consistent follow-up in the renewed ex-ante programme evaluations.
- 11. The panel recommends that the agency implements consistent follow-up strategies for institutions and doctoral schools that fully comply with criteria, as it believes that monitoring will be useful to improve IQA performance.

ESG 2.4 PEER-REVIEW EXPERTS

- 12. The panel recommends that the agency publishes the criteria and process for the selection of site visit teams and experts in ex-post institutional accreditation and ex-ante programme evaluation procedures.
- 13. The panel recommends that students are included in all EQA activities of the agency including ex-ante programme evaluations.
- 14. The panel recommends that the agency strengthens the training of experts, includes training in all EQA activities, and adapts it to the specifics of different procedures.

ESG 2.6 REPORTING

15. The panel recommends that within the new model of ex-ante programme evaluation the reports produced by experts are published in full. Full reports should be published and accessible to the academic community and the wider public.

ESG 2.7 COMPLAINTS AND APPEALS

16. The panel recommends that MAB publishes the criteria for the selection, nomination, and appointment of the members of the Board of Appeals and Complaints.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE

- 1. The panel suggests that MAB continues finding ways to involve more foreign experts in accreditation/evaluation procedures.
- 2. The panel suggests that the agency continues working in the recruitment of non-academic stakeholders, i.e., representatives of civil society, labour unions, entrepreneurs, and regional/local authorities.
- 3. The panel follows up on the 2018 suggestion that students' representatives are included in all advisory bodies.
- 4. The panel suggests that the agency is careful in using that term "consultancy" when referring to workshops that prepare HEIs for accreditation.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

5. The panel suggests that MAB continues with assuring the quality of newly established and renewed EQA procedures.

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

- 6. The panel encourages MAB to continue simplifying, harmonising, and streamlining its processes.
- 7. The panel encourages the agency to continue the effort of including non-academic stakeholders and international experts in its consultation procedures.

ESG 2.4 PEER-REVIEW EXPERTS

8. The panel suggests that an open call for experts be issued on the agency's website to continue developing a diverse list of potential candidates.

ESG 2.5 CRITERIA FOR OUTCOMES

9. To continue developing a QA mindset and to facilitate the navigation of institutions through laws, decrees, standards, and guidelines, the panel suggests that MAB issues an easy-to-use guidebook that compiles all relevant information on EQA processes and methodologies in Hungarian and English.

ESG 2.6 REPORTING

10. For further improvement, the panel suggests that MAB prepares an executive summary of each visit easily accessible to the public in terms of language and outcomes. The panel also suggests that the summary be in English to foster the internationalisation plan of the agency.

ESG 2.7 COMPLAINTS AND APPEALS

11. The panel suggests that the agency involves students in the Board of Appeals and Complaints to enhance the quality of the appeals and complaints procedures.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

session NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
		[17.03.2023] - Online meeting with the agency's r	
		organised ideally two weeks before the s	ite visit]
_	14:00-16:00	Review panel's kick-off meeting and preparations for site visit	
2	16:00-17:30	An online clarification meeting with the agency's resource person regarding the specific national/legal	Director of international affairs, MAB Secretariat
		context in which an agency operates, specific quality	Programme officer, MAB Secretariat, participating as
		assurance system to which it belongs and key	secretary
		characteristics of the agency's external QA activities	
		[28.03.2023] – Day 0 (pre-visit)	
3	16:00-17:00	Review panel's pre-visit meeting and preparations for day I	
4	As necessary	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications	Director of international affairs, MAB Secretariat
		meeting	I
		[29.03.2023] – Day I	
	8:15-8:45	Review panel's private meeting	
5	8:45-9:45	Meeting with the Senior Management team of the Secretariat of MAB (Director and Deputy Director)	Director of general and operative affairs, MAB Secretariat
			Economic director, MAB Secretariat
			Director of international affairs, MAB Secretariat
	9:45-10:00	Review panel's private meeting	
6	10:00-11:00	Meeting with the team responsible for the preparation of the self-assessment report and members of the Secretariat	Associate professor, QA expert
		I COMPANY	Internal QA-specialist, MAB Secretariat
			International officer, MAB Secretariat

session NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Programme officer (institutional accreditation), MAB Secretariat
			Programme officer (accreditation of doctoral schools), MAB Secretariat
	11:00-11:15	Review panel's private discussion	
7	11:15-12:15	Meeting with key staff of the agency/staff in charge of external QA activities	Programme officer (institutional accreditation), MAB Secretariat
			Programme officer (accreditation of doctoral schools), MAB Secretariat
			Programme officer (ex-ante evaluation of programmes), MAB Secretariat
			Programme officer (university professor applications), MAB Secretariat
			International administrator, MAB Secretariat
	12:15-13:00	Lunch (panel only)	
8	13:00-14:00	Meeting with Expert Committees for disciplines	Chair, MAB Committee for Humanities
			Member, MAB Committee for Engineering and Technology
			Co-Chair, MAB Committee for Medical and Health Sciences
			Member, MAB Committee for Agricultural Science (National Union of Students)
	14:00-14:15	Review panel's private discussion	
9	14:15-15:15	Meeting with Standing Committees (for programme accreditation, Doctoral Accreditation, QA, Development and	Chair, MAB Committee on Programme Accreditation
		Strategy)	Member, MAB College for Doctoral Accreditation

session NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Member, MAB Committee for QA, Development and Strategy
			Member, MAB Committee for QA, Development and Strategy
	15:15-15:30	Review panel's private discussion	
10	15:30-16:15	Meeting with Board of Appeals and Complaints	Chair, MAB Board of Appeals and Complaints
			Member, MAB Board of Appeals and Complaints
			Member, MAB Board of Appeals and Complaints
			Programme officer, MAB Board of Appeals and Complaints
	16:15-16:30	Review panel's private discussion	
11	16:30-17:30	Meeting with Financial Supervisory Board	Chair, Financial Supervisory Board
		ONLINE PANEL INTERVIEW	Member, Financial Supervisory Board
			Economic director, MAB Secretariat
12	17:30-18:15	Wrap-up meeting among panel members and preparations for day 2	
		Dinner (panel only)	
		[30.03.2023] – Day 2	
-	8:30-9:30	Review panel's private meeting	
13	9:30-10:15	Meeting with CEO (President, Vice presidents and Board members)	President of MAB
			MAB Board member (National Union of Students)
			MAB Board member
			MAB Board member

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	10:15-10:30	Review panel's private discussion	
14	10:30-11:15	Meeting with representatives of the Ministry of Culture and Innovation and the HE Planning Board	Head of department, Ministry of Culture and Innovation
			Governmental advisor, Ministry of Culture and Innovation
			At present, representatives of the Higher Education Planning Board are not available: new members are currently being nominated (according to the website of the Educational Authority)
	11:15-11:30	Review panel's private discussion	
15	11:30-12:30	Meeting with Heads of reviewed HEIs	Vice Rector for Education, National University of Public Service
			Rector, Moholy-Nagy University of Art and Design
			Rector, The Gate of Dharma Buddhist College (he may arrive a bit later)
			Rector, Eötvös József College
			Vice Rector, Hungarian University of Agriculture and Life Sciences
	12:30-13:15	Lunch (panel only)	
16	13:15-14:15	Meeting with reviewers (visiting team members and external experts)	Visiting team members:
			Member, MAB Committee for QA, Development and Strategy
			Vice Dean for education, University of Pécs
			President, Hungarian Resident Association
			Programme manager, National Union of Students
			External experts:

session NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			University professor, University of Miskolc
			Associate professor, University of Pannonia
	14:15-14:45	Review panel's private discussion	
17	14:45-15:30	Meeting with students (National Union of Students in Hungary, National Union of Doctoral Students, European Students' Union), student representatives from the agency's bodies and student experts ONLINE PANEL INTERVIEW	 Member of the European Students' Union Member of the Board of the National Union of Students in Hungary, responsible for foreign affairs Presidential adviser of the National Union of Students in Hungary Vice president for international affairs, Association of Hungarian PhD and DLA Candidates
	15:30-15:45	De la completa d'activitation	
18	15:45-16:30	Review panel's private discussion Meeting with further stakeholders (Labour Market representatives, representatives of civil society, Chamber of Commerce and Industry), Hungarian Rectors' Conference and Hungarian Doctoral Council	 President, Hungarian Doctoral Council Vice President for higher education, Educational Authority Managing director, Business Council for Sustainable Development in Hungary Vice President of the Hungarian Rectors' Conference Expert committee stakeholders: Member, Committee for Economics Member, Committee for Natural Sciences
	16:30-16:45	Review panel's private discussion	
19	16:45-17:45	Meeting with Hungarian Advisory Board and International Advisory Board	Hungarian Advisory Board Managing director, ELI-ALPS

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
		ONLINE PANEL INTERVIEW	Chair, National Teachers' College International Advisory Board: Higher education expert, Valencia University of Technology Professor at the University of Warsaw, former vice president of the Polish accreditation commission PKA
			International higher education consultant
20	17:45-18:15	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
		[31.03.2023] – Day 3	
21	8:15-9:15	Meeting among panel members to agree on final issues to clarify	
22	9:15-10:15	Meeting with president to clarify any pending issues	President of MAB
23	10:15-12:15	Private meeting between panel members to agree on the main findings	
	12:15-13:15	Lunch (panel only)	
24	13:15-14:00	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 Hungarian Accreditation Committee (MAB)¹ by ENQA

Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN MAB, ENQA AND EQAR September 2022 Amended February 2023

I. Background and context

The Hungarian Accreditation Committee (MAB) is an independent professional body authorised by the national government to conduct external evaluations of the quality of educational, academic, research and artistic activities provided by higher education institutions. The agency is also mandated to assess the internal quality assurance systems operated by higher education institutions, and to provide expert services in processes concerning higher education institutions. MAB was established by the country's first Higher Education Act in 1993 as one of the first higher education quality assurance agencies in Europe. MAB operates in accordance with the higher education law of Hungary, its institutional and doctoral school accreditation procedures are developed on the basis of international standards, and follows the guidelines developed by its disciplinary committees and the MAB Board. The agency's mission is to promote high-quality education and quality assurance in Hungarian higher education. MAB is committed to improve the quality and international reputation of Hungarian higher education and therefore strives to strengthen the quality culture of higher education institutions through all its activities.

MAB's activities involve a range of initial (ex-ante) evaluations and ex post accreditation processes.

The ex-ante evaluations are independent expert reviews of new higher education institutions, and of new programme and learning outcome framework requirements of vocational education and training (VET), Bachelor and Master programmes. Ex-ante evaluations also include the reviews of new VET, Bachelor and Master programmes, and new doctoral schools.

The ex-post accreditation procedures are carried out for higher education institutions and doctoral schools and include assessment for medical schools against the MAB medical criteria based on the WFME (World Federation for Medical Education) BME 2020 standards. MAB also evaluates university professorship applications on institutional request. The agency develops standards and guidelines for the accreditation of higher education institutions and programmes.

In addition, the agency organizes in-person and online conferences, training sessions and seminars on quality assurance in higher education both for national and international audiences. MAB actively participates in various QA forums and projects both in Hungary and abroad and disseminates its findings through its website and online journal.

MAB has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2002 and is applying for renewal of ENQA membership.

MAB has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2018 and is applying for the renewal of EQAR registration.

2. Purpose and scope of the review

¹ Currently MAB, formerly referred to as HAC (prior acronym)

This review will evaluate the extent to which MAB (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 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 the agency must be addressed in the external review:

MAB's external quality assurance activities within the scope of ESG:

- Initial (ex-ante) evaluation of higher education institutions
- Initial evaluation of programme and learning outcome framework requirements of Vocational Education and Training (VET) programmes,
- Initial evaluation of programme and learning outcome framework requirements of Bachelor programmes,
- Initial evaluation of programme and learning outcome framework requirements of Master programmes,
- Initial evaluation of VET programmes,
- Initial evaluation of Bachelor programmes,
- Initial evaluation of Master programmes,
- Initial evaluation of doctoral schools,
- Ex post accreditation of existing higher education institutions in five-year cycles,
- Ex post accreditation of existing doctoral schools in five-year cycles,
- Accreditation of medical schools based on the WFME 2020 standards.

The review should cover all activities carried out by MAB even if a certain type of activity was not carried out in practice yet; this also includes activities offered abroad i.e. Ukraine.

The review will also address (to the extent of the available information), the following planned external quality assurance activities (currently in a design phase) related to:

- renewal of the ex-ante evaluation (registration) of VET, Bachelor and Master programmes
- ex-post evaluation of VET, Bachelor and Master programmes based of study fields (clusters)
- integration of ex-post accreditation of doctoral schools into the institutional accreditation procedure

2.2 Other matters relevant to MAB's application for Registration on EQAR

Considering the renewal of MAB's application to EQAR, the self-evaluation report and the external review report is expected to also cover issues where the Register Committee concluded in its last decision that the agency complied only partially with the ESG, namely ESG 2.4, ESG 2.7, ESG 3.3 and ESG 3.4 and to consider any substantive changes in the agency following the last review i.e. the new approach evaluating doctoral schools and WFME standard-based accreditation process, in particular to how the activities cover ESG Part I and how such standards are applied in practice.

Furthermore, the self-evaluation report and external review report should also consider how MAB's recognition of external QA results and decisions follows the ESG in cases where the external QA activity is carried out by a non EQAR-registered QA agency.

The external evaluation of full professorship applications of technical and vocational education organizations is outside of the scope of the ESG and not relevant for the application for inclusion on EQAR.

In case of any substantive changes taking place following the confirmation of the Terms of Reference and the review i.e. including introduction or change in the activities within and outside of the scope of the ESG, the agency is expected to inform EQAR at the 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 MAB, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website²);
- 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). 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.

² The agency is encouraged to publish the ToR on its website as well.

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*³ 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.

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.

³ Available at: <u>https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg</u>

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 before expiry of the agency's registration on EQAR. 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.

Agreement on Terms of Reference	August 2022
Appointment of review panel members	October 2022
Self-assessment completed	30 November 2022
Screening of SAR by ENQA Review Coordinator	December 2022
Preparation of the site visit schedule and indicative timetable	January 2023
Briefing of review panel members	February 2023
Review panel site visit	March 2023
Draft of review report and its submission to ENQA Review	May 2023
Coordinator for verification of its compliance with the Guidelines	-
Draft of review report to be sent for a factual check to the agency	June 2023

5. Indicative schedule of the review

Agency statement on the draft report to the review panel (if necessary)	June 2023
Submission of the final report to ENQA	July 2023
Validation of the review report by the Agency Review Committee	September 2023
Publication of report	September/October 2023
EQAR Register Committee meeting and initial consideration	Autumn 2023/ February 2024
Decision on ENQA membership by the ENQA Board	February 2024 / April 2024

ANNEX 3: GLOSSARY

ARACIS	Agenția Română de Asigurare a Calității în Învățământul Superior (Agency for Quality Assurance in Higher Education)
BAC	Board of Appeals and Complaints
DG REFORM	European Commission's Directorate-General for Structural Reform Support
DEQAR	Database of External Quality Assurance Results
DOK	College for Doctoral Accreditation
DOSZ	Doktoranduszok Országos Szövetsége (Association of Hungarian PhD and DLA
	Candidates)
ECAQA	Eurasian Centre for Accreditation and Quality Assurance in Higher Education and Health Care
ENQA	European Association for Quality Assurance in Higher Education
EPDAD	Öğretmenlik Eğitim Programları Değerlendirme ve Akreditasyon Derneği
	(Association for Evaluation and Accreditation of Teacher Education Programs)
EQAR	European Quality Assurance Register
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
EU	European Union
GOAF	Global Observatory on Academic Freedom
HAB	Hungarian Advisory Board
HE	higher education
HEI	higher education institution
HÖOK	Hallgatói Önkormányzatok Országos Konferenciája (National Union of Students in
	Hungary)
IAB	International Advisory Board
IQA	internal quality assurance
KIM	Hungarian Ministry of Culture and Innovation
EMMI	Ministry of Human Capacities
EQA	external quality assurance
MAB	Magyar Felsőoktatási Akkreditációs Bizottság (Hungarian Accreditation Committee)
NGO	Non-governmental Organisations
NQF	National Qualifications Framework
OECD	Organisation for Economic Co-operation and Development
OSUN	Open Society University Network
PDCA	Plan-Do-Check-Act
QA	quality assurance
RRF	Recovery and Resilience Facility
SAR	self-assessment report
SKVC	Studiju Koybes Vertinimo Centras (Centre for Quality Assessment in Higher Education)
TIR	Titkársági Információs Rendszer (MAB's Secretariat's Information System)
VET	vocational education and training
WFME	World Federation for Medical Education
WFME/BME	
Standards	World Federation for Medical Education/Basic Medical Education Standards

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY MAB

Self-assessment report (November 2022)

Annexes of the self-assessment report:

- Comparison of MAB's EQA activities to Part 1 of the ESG
- Staff figures of MAB's Secretariat 2018-2021
- Feedback questions sent to doctoral schools after the onsite (or online visit)
- Organisational structure
- Recovery and resilience plan for Hungary. Component B Renewing Universities. Sectoral modernisation of higher education (RRF-2.1.1.-21)

ADDITIONAL INFORMATION AND DOCUMENTS PROVIDED BY MAB, BEFORE AND DURING THE VISIT, ON REQUEST OF THE REVIEW PANEL

- Accreditation schedules for ex-post procedures
- Analysis on institutional accreditation (MAB RRF IA elemzés gyorsjelentés 1215)
- Data on experts in the pool
- English translation of Instructions, Forms and Requirements for Programme Launch
- English translation of IQA System
- English translation of Self-Assessment Guide for Institutional Accreditation
- English translation of Quality Policy
- English translation of the Doctoral School Guide
- Financial Report 2021
- Operations of the Secretariat (Munkaügyi szabályzat módosítás 2022)
- Profit and loss statements from 2018 to 2021
- Table with appeals and complaints processed by the agency 2019-2020
- Tasks of programme officers (in Referens Kézikönyv)
- Template for institutional accreditation report with supporting questions (Intézményakkreditációs jelentés sablon)
- Template for the accreditation report of doctoral schools, with supporting material (DIA jelentéssablon)
- Template for WFME standards-based accreditation report with supporting questions (Sitevisit team report template - WFME)
- Training materials on the accreditation of doctoral schools
- Training materials on institutional accreditation, guide to institutional self-assessment report, and a memo on the kick-off meeting of the site-visit team for the institutional accreditation of the Hungarian Dance Academy (MTE alakuló ülés emlékeztető 20221025)
- Training materials and memo of the training session WFME standards-based accreditation procedure of the basic medical programme of the Faculty of Medicine, Semmelweis University
- Training (meeting) schedule for the WFME-standards-based accreditation of the basic medical programme of the Faculty of Medicine, Debrecen University

OTHER SOURCES USED BY THE REVIEW PANEL

- MAB's website MAB Magyar Felsőoktatási Akkreditációs Bizottság
- OECD. "Ensuring Quality Digital Higher Education in Hungary," 2023.
- OSUN Global Observatory on Academic Freedom (GOAF) at the Central European University in Vienna, Austria. "Academic Freedom in Hungary," 2021.

ENQA AGENCY REVIEW 2023

THIS REPORT presents findings of the ENQA Agency Review of the Hungarian Accreditation Committee (MAB), undertaken in 2023.

