

ENQA AGENCY REVIEW

NATIONAL AGENCY FOR HIGHER EDUCATION QUALITY ASSURANCE (NAQA)

MARIE GOULD, NÚRIA COMET SEÑAL,
OLIVER VETTORI, ARTUR DAVTYAN
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CONTENTS

CONTENTS.....	1
EXECUTIVE SUMMARY.....	3
INTRODUCTION.....	5
Background of the review and outline of the review process.....	5
BACKGROUND OF THE REVIEW.....	5
SCOPE OF THE REVIEW.....	5
REVIEW PROCESS.....	5
Higher education and quality assurance system of the Agency.....	8
HIGHER EDUCATION SYSTEM.....	8
QUALITY ASSURANCE.....	10
National Agency for Higher Education Quality Assurance (NAQA).....	11
NAQA'S ORGANISATION/STRUCTURE.....	13
NAQA'S FUNCTIONS, ACTIVITIES, PROCEDURES.....	16
NAQA'S FUNDING.....	18
FINDINGS: COMPLIANCE OF NAQA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG).....	19
ESG PART 3: QUALITY ASSURANCE AGENCIES.....	19
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE.....	19
ESG 3.2 OFFICIAL STATUS.....	24
ESG 3.3 INDEPENDENCE.....	25
ESG 3.4 THEMATIC ANALYSIS.....	28
ESG 3.5 RESOURCES.....	30
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT.....	33
ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES.....	36
ESG PART 2: EXTERNAL QUALITY ASSURANCE.....	37
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE.....	37
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE.....	48
ESG 2.3 IMPLEMENTING PROCESSES.....	50
ESG 2.4 PEER-REVIEW EXPERTS.....	56
ESG 2.5 CRITERIA FOR OUTCOMES.....	60

ESG 2.6 REPORTING.....	63
ESG 2.7 COMPLAINTS AND APPEALS.....	66
ADDITIONAL OBSERVATIONS.....	70
NATIONAL ROLE OF NAQA.....	70
INTERNATIONAL ROLE OF NAQA	70
CONCLUSION.....	71
SUMMARY OF COMMENDATIONS.....	71
OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS	71
SUGGESTIONS FOR FURTHER IMPROVEMENT	72
ANNEXES.....	74
ANNEX 1: PROGRAMME OF THE SITE VISIT	74
ANNEX 2: TERMS OF REFERENCE OF THE REVIEW	80
ANNEX 3: GLOSSARY	93
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW	94
DOCUMENTS PROVIDED BY NAQA.....	94
OTHER SOURCES USED BY THE REVIEW PANEL	94



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EXECUTIVE SUMMARY

This report analyses the compliance of the National Agency for Higher Education Quality Assurance (NAQA) from Ukraine with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The purpose of the review is to check whether NAQA operates in substantial compliance with the ESG, as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. ENQA requires all member agencies to undergo an external cyclical review at least once every five years and compliance with the ESG is a condition for membership.

This is the NAQA first review conducted between April 2025, when the self-assessment review (SAR) document was received, and February 2026 when the draft report was submitted to ENQA. The panel conducted the site visit from 10 to 12 December 2025 at the Embassy of Ukraine in Budapest, Hungary.

This report examines the development of NAQA from its establishment in 2019 up to 2025. As an exceptional case, the first aspect to highlight is the context—well known to all—in which the Agency has operated during these years. Between 2020 and 2022, the impact of the COVID-19 pandemic led to the introduction of evaluations in a hybrid format. More significantly, the Russian invasion and the imposition of martial law from 2022 to the present day have had a profound impact.

Focusing specifically on the higher education context, the war has led to the destruction of universities, reductions in academic staff, increased student mobility and relocations, and other major disruptions. Within this challenging environment, NAQA, with the support of the government and stakeholders, has adapted its regulations to ensure that external quality assurance processes continued. In Ukraine, external quality assurance currently focuses on programme accreditation, although a transition towards institutional evaluation is anticipated.

During the visit, several aspects of the Agency's work emerged as particularly noteworthy. The professionalism, energy, and dedication demonstrated by the staff as well as the Agency's digitalisation efforts. NAQA is regarded by the stakeholders as a dynamic organisation capable of organising events such as the Annual Quality Forum, which brings together thousands of participants. The involvement of students in the organisation and in quality assurance procedures is exemplary. The volume of thematic analyses produced is also remarkable for a young Agency.

Nevertheless, the panel did identify some challenges and areas for further development in relation to ESG compliance. These include finalising the implementation of the post-accreditation monitoring and refining the procedures of complaints and appeals. Regarding the internal organisation, the panel considers that NAQA should reflect on how it follows up on its internal quality assurance system. This should include a clear feedback-based internal improvement plan and a more quantitative approach to monitoring progress. Finally, the Agency currently manages a substantial volume of programme accreditations, a workload that remains highly resource intensive despite advanced digital tools. As additional responsibilities such as institutional accreditation and post-accreditation monitoring are introduced, careful consideration of long-term process sustainability will be essential.

Considering the presented evidence in the review report, the panel finds NAQA compliant with the following standards of the ESG:

- 3.1 Activities, policies and procedures for quality assurance
- 3.2 Official status
- 3.3 Independence
- 3.4 Thematic analysis
- 3.5 Resources
- 3.6 Internal quality assurance and professional conduct
- 3.7 Cyclical external review of agencies

- 2.1 Consideration of internal quality assurance
- 2.2 Designing methodologies fit for purpose
- 2.3 Implementing processes
- 2.4 Peer review experts
- 2.5 Criteria for outcomes
- 2.6 Reporting

Next, according to the judgment of the panel, NAQA is found to be partially compliant with the following two ESG standards:

- 2.3 Implementing processes
- 2.7 Complaints and appeals

Based on NAQA's compliance with the ESG standards presented above and based on the review panel's analysis provided in this report, the review panel considers that NAQA is compliant with the ESG.

INTRODUCTION

This report analyses the compliance of National Agency for Higher Education Quality Assurance (Національне агентство із забезпечення якості вищої освіти, NAQA) from Ukraine with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from April 2025 to February 2026.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

The European Association for Quality Assurance in Higher Education (ENQA) regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

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

SCOPE OF THE REVIEW

The accreditation of study programmes is the only external quality assurance (EQA) activity of NAQA listed in the Terms of Reference (April 2025) (see Annex 2) that falls within the scope of the ESG.

REVIEW PROCESS

The 2025 external review of NAQA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews, 2021* and in accordance with the timeline set out in the Terms of Reference.

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

- Marie Gould, Head of Tertiary Education Monitoring and Review, Quality and Qualifications Ireland (QQI), Ireland, Chair, QA professional (ENQA nominee)
- Núria Comet Señal, Internal Quality Assurance and Project Coordinator, Catalan University Quality Assurance Agency (AQU Catalunya), Spain, Secretary, QA professional (ENQA nominee)
- Oliver Vettori, Dean Accreditation and Quality Management, Vienna University of Economics and Business, Austria, panel member, academic (EUA nominee)
- Artur Davtyan, Bachelor of Science in Applied Statistics and Data Science Master of Education in Organizing Education, Yerevan State University, Armenia, panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

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

Following the ENQA methodology for Agency reviews (*Guidelines for ENQA Agency Reviews, 2021*), the panel was supported throughout the process—from preparation to the site visit and the production of the external review report—by the ENQA review coordinator.

Given the complexity and unique context of this review, the ENQA review coordinator's contribution was very significant in ensuring the smooth conduct of the site visit and the overall quality of the review, the panel wishes to acknowledge and express appreciation for this guidance.

The review panel was initially provided with the self-assessment report (SAR), including some appendices. After a preliminary analysis of the SAR, the panel requested additional information, which was promptly and comprehensively provided by the Agency. Furthermore, as not all relevant documentation was available in English, the panel requested NAQA to translate certain documents. Other documents were translated by one of the panel members who is fluent in Ukrainian. During the site visit, the panel also requested further information, which was again provided promptly.

A preparatory online briefing for the panel was conducted on 17 September 2025. In addition, the panel held several online meetings between September and December 2025 to plan and prepare for the review.

Ms Anna Shylyna from NAQA acted as the Agency's resource person to support the organisation of the review. She and the Vice Head of NAQA met with the panel for a very informative online pre-visit meeting on 18 November 2025.

The panel conducted the site visit from 10 to 12 December 2025. Given that Ukraine is still at war, it was proposed and agreed with the panel to hold the visit at the Embassy of Ukraine in Budapest. The panel wishes to acknowledge and express its gratitude to the Ambassador and Agency staff for making its facilities available for this review.

Following the site visit, the review panel produced its final report based on the self-assessment report, additional information provided, the site visit, and the panel's findings. NAQA was given the opportunity to comment on the factual accuracy of the draft report.

The review panel is very grateful to NAQA, its management, and staff for their supportive and open attitude throughout the review, which contributed significantly to the panel's work.

Self-assessment report

As outlined by NAQA, the development of its self-assessment report (SAR) was undertaken in a structured and collaborative process, initiated in May 2024 and completed over eight months. The process began with data collection and regular working meetings by the SAR authors' team. In December 2024, an extended working group, including a Chair and Secretary, was formally approved to oversee preparation for the ENQA/EQAR external review. The first draft of the SAR was completed by the end of 2024 and shared with the NAQA Board, Advisory Board, and key stakeholders such as students and employers. Feedback from these groups informed the second draft, which was published on the NAQA website for wider public discussion.

Between April and June 2025, NAQA conducted an extensive stakeholder consultation phase, gathering input from student unions, employers, higher education institutions, national and international quality assurance experts, and partners. This feedback was analysed and incorporated into the final version of the SAR, which was approved by the NAQA Board in July 2025.

The SAR adheres to the structure recommended by ENQA, it includes a description of the self-assessment process; descriptions of the higher education and QA systems, and NAQA's profile, history and EQA activities; sections addressing each of the ESG, with links to key documents; opinions of the Agency's stakeholders; a SWOT analysis; key challenges and areas for future development; and several annexes.

The self-assessment report served as the basis for the review and was generally comprehensive and well-structured. However, it did not always clearly outline or define the quality assurance processes under consideration. As a result, the panel found it difficult to identify the main elements of these processes from the SAR alone.

While the panel appreciated the overall organisation of the report, certain sections appeared rather sparse. It would have been more beneficial and informative for the panel if the report had adopted a more analytical approach, supported by summative and quantitative data, to provide a more objective perspective on the processes and their outcomes. With the exception of the SWOT analysis—where NAQA clearly articulated its weaknesses and opportunities—the remainder of the report could be regarded as somewhat less reflective or evaluative.

It should be noted that NAQA responded promptly to all requests for additional data and information throughout the review process.

Another challenge for the panel was the large volume of documentation in Ukrainian. Although this was understandable, the use of AI-assisted translation and one of the panel member's knowledge of the language became necessary to ensure timely progress. Similarly, the English version of the official website contained less information than the Ukrainian version, which posed a certain challenge for the evaluation.

Site visit

As Ukraine is currently at war, travel restrictions are in place. Consequently, the Agency proposed—and it was agreed in advance with the panel—to conduct some of the site visit meetings online or in hybrid mode for external stakeholders and for most of the NAQA Board Members and Secretariat staff, in order to avoid the long train journey from Kyiv to Budapest (approximately 1,200 km one way, taking over 20 hours).

Although the panel considers an on-site visit beneficial for the openness and dynamics of discussions, in this case the Agency's request was accepted with ENQA's approval. This arrangement resulted in the visit being conducted in a hybrid format, with both in-person and online sessions. Two online interpreters attended the sessions.

During the three days, the panel confirms that it had the opportunity to speak with all interviewees as planned in the site visit schedule.

The panel met with a wide range of internal staff from different functional areas, as well as members of the Board, and individuals involved in the external quality assurance activities of the Agency, including experts and employers. During the visit the panel also met with representatives of the higher education institutions, and with a diverse range of students, both of whom provided valuable insights into the activities and impact of the Agency. National context and strategic input were provided by representatives from different Ministries with which the Agency engages.

All meetings were conducted with openness and a high level of engagement, resulting in constructive and informative discussions. The panel observed genuine respect for, and commitment to, the work of the Agency, with some participants describing the Agency as a “catalyst for change”.

The panel appreciates the contributions from all members of the NAQA staff, heads, and the members of the internal commissions, and especially the Board. Their dedication and professionalism to NAQA were visible throughout the visit.

The panel is also grateful to all the external participants (experts, representatives of government and institutions, employers, students, and other external stakeholders) contributing to the review with their input, which was found as important in building an informed and rounded view on the Agency's work.

For the detailed schedule of meetings, see Annex I.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

As outlined in the SAR, the national higher education (HE) system of Ukraine is defined by the Law of Ukraine No. 1556-VII "On Higher Education" (2014). It includes institutions of various ownership types, distinct qualification levels, defined study fields, and a structured quality assurance system.

Ukraine's HE system consists of institutions of three ownership forms:

- State-owned institutions, funded by the state budget.
- Municipal institutions, managed and financed by local authorities.
- Private institutions established and funded by non-governmental entities.

As of January 1, 2025, Ukraine has 625 higher education providers:

	State-owned	Municipal	Private
Higher education institutions	173	28	104
Affiliated HEIs	40	0	45
Research institutions	184		2
Colleges	37	12	
Total	434	40	151

Source: SAR

The analysis of the distribution of students by the form of ownership of educational institutions shows that, that the largest proportion of students are students in state-owned institutions (see Figure below).



Figure 25. Distribution of students by higher education institutions of different forms of ownership

Source: Review on the quality of higher education in Ukraine, 2024

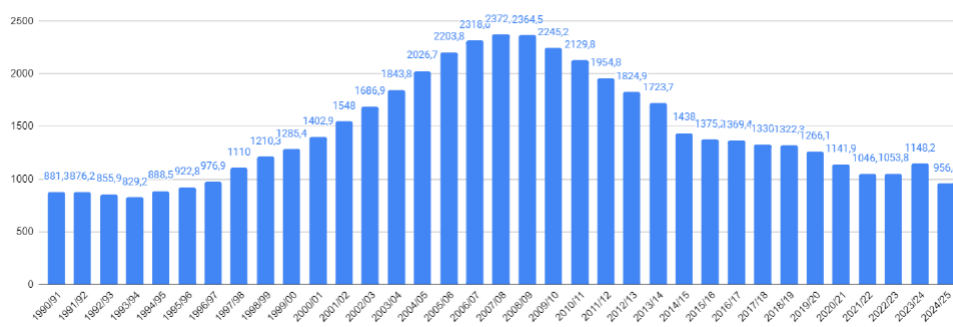
The levels and degrees of Higher Education follow the Bologna Process framework, with four levels:

- Initial (Junior Bachelor) – corresponds to level 5 of the European Qualifications Framework (EQF)
- First (Bachelor) level
- Second (Master) level
- Third (PhD/Doctor of Philosophy or Doctor of Arts) level

Each level requires successful completion of an accredited study programme, leading to the corresponding academic degree.

According to the State Statistics Committee of Ukraine, the total number of students has been gradually declining since 2008. At the beginning of the 1990–1991 academic year, there were 881,300 students studying at Ukrainian HEIs (universities, academies, institutes). The number reached its highest point in 2007–2008, with a total of 2,372,500 students. Following that, there was a gradual decline (See Figure below). The reasons for the decrease in the number of students include demographics and economic crises, the annexation of Crimea and the Russia invasion.

Figure 3. The number of HE students in 1990–2025 (in thousands)



Source: SAR

According to the Unified State Electronic Database on Education (USEDE), as of January 1, 2025, the total number of students is 1 075 285 students.

The distribution of students by level of higher education is as follows:

- Junior bachelor — 639 (< 1%)
- Bachelor — 736. 483 (68, 53%)
- Master — 282. 414 (26, 28%)
- Doctor of arts — 236 (< 1%)
- PhD — 54. 766 (5, 10%).

The structure of study fields is based on the International Standard Classification of Education (ISCED) and approved by the Cabinet of Ministers of Ukraine. Previously, Ukraine had 29 areas of knowledge and 121 specialities. The new classification, effective from November 1, 2024, includes 10 broad fields plus one additional area, “Security and Defence,” and 110 specialities (Cabinet of Ministers Resolution, 25 February 2025).

Each study programme defines:

- The list and logical sequence of study components.
- Entry qualifications.

- The number of ECTS credits required for completion.
- The expected learning outcomes and competencies.

Development and Challenges of the Higher Education Sector

Since gaining independence, Ukraine's higher education system has undergone major structural and demographic transformations. Between 1990 and 2010, the number of HEIs expanded significantly due to the rapid growth of private institutions and the establishment of regional branches, even amid economic instability and declining numbers of school graduates.

However, after the annexation of Crimea in 2014 and ongoing Russian aggression, the system faced serious disruptions. The full-scale invasion in 2022 triggered further crises — mass migration, loss of infrastructure, and institutional relocations. In total, 29 higher education institutions and 64 affiliated branches from state, municipal, and private sectors were relocated from temporarily occupied territories (according to NAQA's 2022 and 2024 Quality Reviews).

Current State and Future Outlook

The *Strategy for the Development of Higher Education in Ukraine (2022–2032)*, approved by the Cabinet of Ministers (Order No. 286-r, 23 February 2022), emphasises modernisation, network restructuring, and institutional mergers. Nevertheless, progress has been limited due to unclear mechanisms for closures and mergers, as well as the ongoing war context.

Between 2021 and 2024, the Cabinet of Ministers approved 21 reorganisation decisions for state-owned HEIs. The restructuring process continues in 2025 and remains one of the main challenges for the Ministry of Education and Science (MoES).

Impact of Martial Law

The Agency provided the panel with information on the impact of Martial Law on the higher education system. Since 2014, 29 HEIs and 64 Applied Sciences Universities (ASUs) have been relocated. Since February 2022, 137 universities have suffered bombing and shelling, four of which have been completely destroyed. In addition, 44 universities have been displaced, accommodating more than 54,000 students and almost 7,000 teaching staff. Nevertheless, all HEIs continue to operate, albeit under air raid alarms and regular missile attacks.

QUALITY ASSURANCE

The Ukrainian Quality Assurance (QA) system comprises three main components:

- Internal QA within higher education institutions.
- External QA, coordinated by the NAQA or authorised foreign QA Agency (registered in EQAR)
- Internal QA of the NAQA itself, ensuring continuous improvement of its processes.

Currently, the Ministry of Education and Science of Ukraine has approved NAQA's procedures for the accreditation of study programmes in higher education as a tool of external higher education quality assurance in Ukraine.

The accreditation of study programmes, bachelor's, master's, and PhD levels is performed at the initiative of the higher education institution. It is conducted for the first time when, at the start of the accreditation procedure, students from the programme's first cohort have completed at least 60 % of the ECTS credits required for the programme.

According to Ukrainian legislation HEIs can apply for study programme accreditations to NAQA or one of the 49 foreign accreditation agencies listed in the List of Foreign Accreditation Agencies and Higher Education Quality Assurance Agencies that Issue Certificates of Accreditation of Study Programmes Recognised in Ukraine (Cabinet of Ministers of Ukraine Order 554 of July 10, 2019). In Ukraine, certificates of accreditation of study programmes issued by foreign accreditation agencies are recognised without additional procedures and audits.

If the higher education institutions choose NAQA as the Agency, it shall notify NAQA of their intention to accredit study programmes in the following academic year through the ICS (NAQA Database), within the timeframe specified by NAQA. From this point onwards, the accreditation process begins, as described under ESG 2.3 in this report.

If a study programme is accredited by a foreign Agency, the official accreditation decision must be sent to NAQA to be included in the USEDE (Unified State Electronic Database on Education).

According to the USEDE, in total, 23.987 study programmes of 625 higher education providers are subject to accreditation as of 1 January 2025. From 2020 to 2024, 112 accreditation certificates have been issued by foreign accreditation agencies.

As explained in the Regulations on Accreditation of Study Programmes in Higher Education the aims of the programme accreditation are:

- to identify quality compliance of the study programme, and of educational activities under such programme, with the Criteria established by these Regulations.
- to assist higher education institutions in identifying strengths and weaknesses of the study programme and of the educational activities under such programme.
- to provide stakeholders with objective information about the quality of the study programme and of the educational activities under such programme.
- to enhance trust in higher education in Ukraine.
- to promote the integration of Ukraine's higher education institutions into the European Higher Education Area.

The NAQA Strategy Implementation Plan (Action Plan) for 2024–2026 includes the planned development of regulations on institutional accreditation. In autumn 2024, NAQA commenced a joint project with the Estonian Quality Agency for Education (HAKA) to pilot institutional accreditation in Ukraine. Further information on this pilot project is provided in section ESG 3.1 below.

NATIONAL AGENCY FOR HIGHER EDUCATION QUALITY ASSURANCE (NAQA)

NAQA is the only national body in Ukraine that is designated by the state as an accreditation body, NAQA is defined as a non-profit organisation. It is a legal entity founded by Resolution No. 244 of the Cabinet of Ministers of Ukraine, dated 15 April 2015, in accordance with the *Law of Ukraine on Higher Education* of 1 July 2014, as a permanent collegial body.

According to the SAR, the first Board of the Agency was elected in 2015, however, because of a legislative complexity, it never started its official work. In December 2018, according to the amended *Law of Ukraine on Education*, the new NAQA Board was selected by an international competition commission and formally approved by the Cabinet of Ministers of Ukraine. At the end of February 2019, NAQA formally commenced its activities and recruited NAQA Secretariat staff.

NAQA's new and current mission is “to ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders”. To support the

new mission, NAQA has identified the following goals, values and principles that are published on the website.

The infographic is divided into three main sections, each with a title bar and a list of items. The first section, 'STRATEGIC GOALS', has a blue title bar and a white background with blue and yellow arrow icons. The second section, 'VALUES', has a yellow title bar and a white background with blue and yellow arrow icons. The third section, 'PRINCIPLES OF THE INTERNAL CULTURE OF THE ORGANIZATION', has a blue title bar and a white background with blue and yellow arrow icons. The entire infographic is framed by a blue and yellow border.

STRATEGIC GOALS

- ▶ To become full member of the European Association for Quality Assurance in Higher Education (ENQA) and to be registered in the European Quality Assurance Register for Higher Education (EQAR);
- ▶ To modernise external higher education quality assurance system, in particular, through developing the institutional accreditation model and launching the independent institutions for higher education quality evaluation;
- ▶ To encourage innovative practices in HEIs in the interaction of research, education, and business.

VALUES

- ▶ **Partnership** – collaboration based on equality and respecting partners.
- ▶ **Innovation** – new ideas, technologies, and techniques production and implementation related to higher education quality assurance.
- ▶ **Responsibility** – conscious attitude to the consequences of actions and decisions taken.
- ▶ **Integrity** – commitment to moral principles and standards.
- ▶ **Openness** – readiness to cooperate with all stakeholders.
- ▶ **Transparency** – willingness to provide public with complete and objective information on the higher education quality in Ukraine and the results of the Agency's activities to ensure it.
- ▶ **Independence** – full and effective higher education quality assurance without outside influence.
- ▶ **Professionalism** – consistency of achieving high standards in higher education quality assurance using professional knowledge and experience.
- ▶ **Trust** – confidence that participants of the quality assurance process honestly perform their duties.

PRINCIPLES OF THE INTERNAL CULTURE OF THE ORGANIZATION

- ▶ Respect for everyone's opinion, collegiality, and desire for consensus;
- ▶ Striving for self-improvement, and self-development based on critical self-assessment;
- ▶ Cultivating a spirit of mutual support, sincerity, and initiative;
- ▶ Building and maintaining institutional and personal reputation.

Source: SAR 2025

A key strategic objective of the Agency is the internationalisation of higher education in Ukraine and of its own activities. Since 2019, NAQA has built strong international partnerships, according to the SAR, the Agency has signed 15 cooperation agreements with European QA agencies and actively exchanged best practices in quality assurance and institutional development.

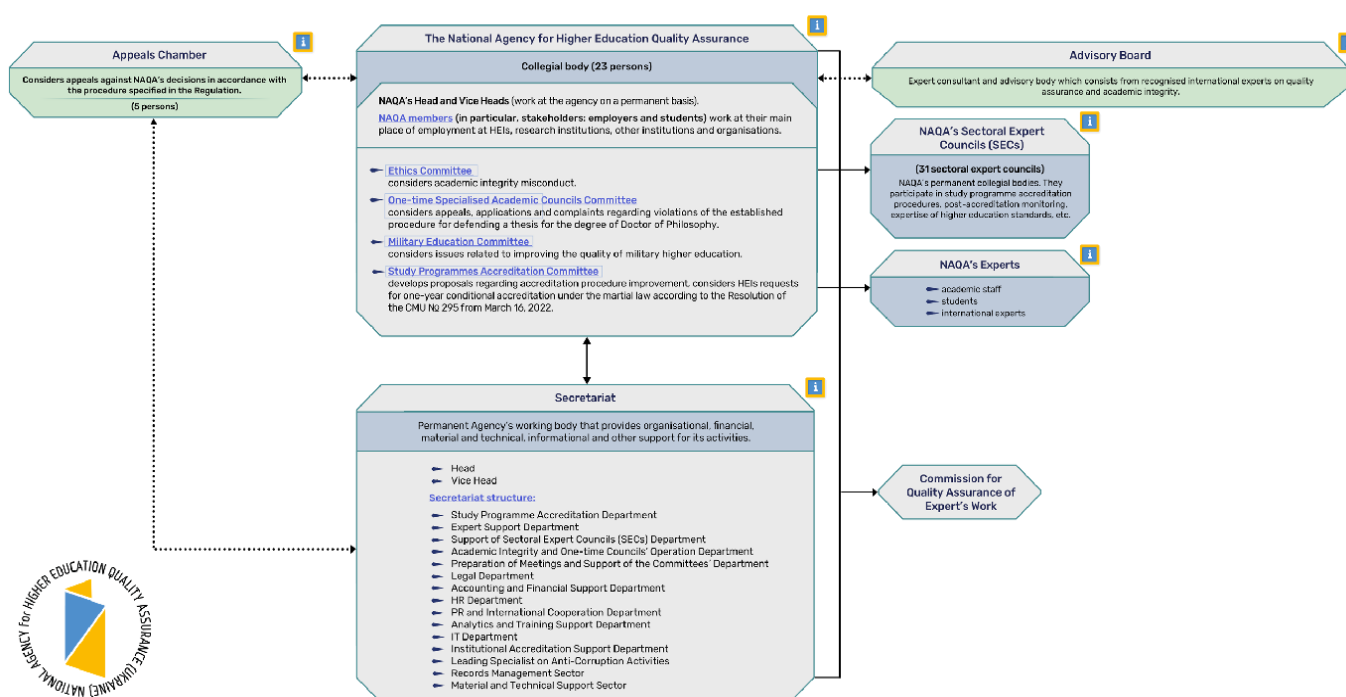
A notable partnership is a project “Enhancement of Higher Education Quality in Ukraine” with the Estonian Quality Agency for Education (HAKA). Following the signing of a memorandum in 2024, both agencies engaged in a joint institutional accreditation pilot project in Ukraine, funded by the Estonian Centre for International Development (ESTDEV). In 2025, three Ukrainian universities completed a full institutional accreditation procedure based on HAKA's adapted methodology and conducted by experts from HAKA and NAQA. Lutsk National Technical University, Kyiv National Economic University named after Vadym Hetman, and National University of Ostroh Academy received institutional accreditation for a period of seven years.

NAQA also plays an active role in the international QA community. It holds affiliate status with ENQA (renewed in 2025) and full membership in several key organizations, including INQAAHE, CEENQA, ICAI, ENAI, and GAIN. The Agency notes within the SAR that these memberships enhance NAQA's visibility, foster collaboration, and strengthen its commitment to academic integrity and European standards.

Furthermore, NAQA participates as a partner in eight Erasmus+ projects, including Erasmus+ SEQA-ESG2, which supports the development of an ESG-compliant quality assurance system in Ukraine. It also cooperates with the UK Quality Assurance Agency (QAA) and the British Council on expert training and institutional capacity building.

NAQA'S ORGANISATION/STRUCTURE

The organisational organigram of NAQA present in SAR, and [published on the website](#), is illustrated in the figure below.



Source: SAR 2025

As outlined in the SAR and confirmed by the panel during the site visit, the Agency's structure includes the NAQA Board and Committees, including the Appeals Committee, the Advisory Board, Experts and Sectoral Expert Councils (SECs), the Commission on work quality assurance of experts and the NAQA Secretariat.

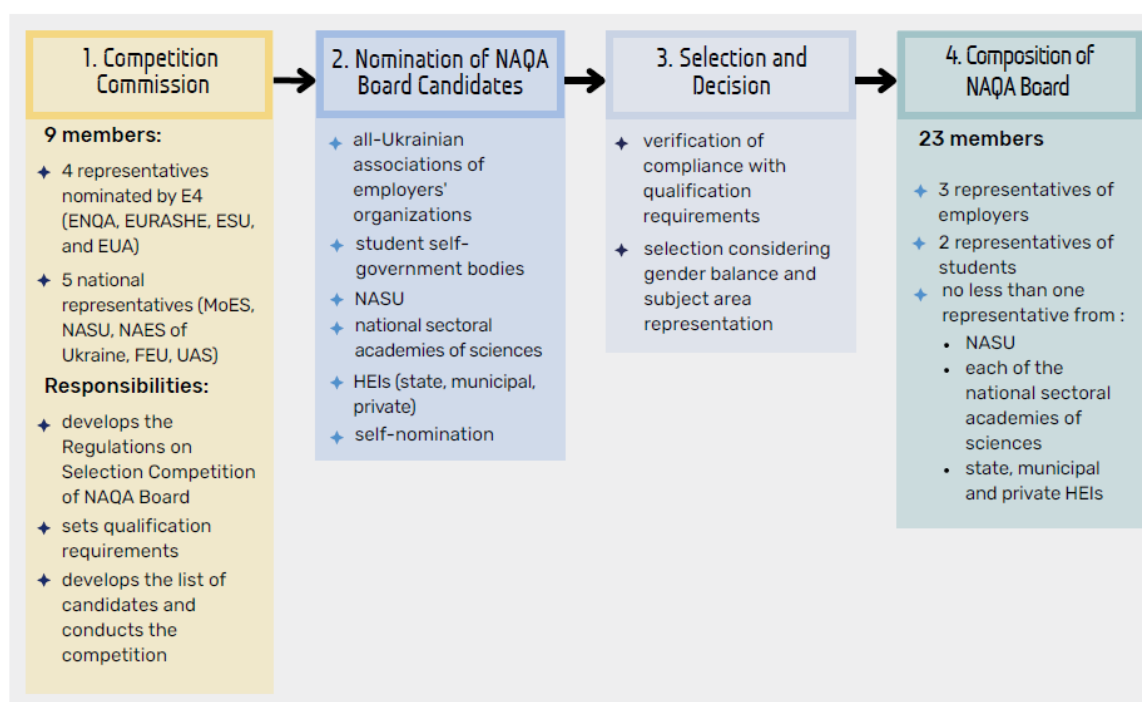
NAQA Board

As outlined in the SAR, according to the Charter, 'NAQA Board consists of 23 persons appointed by the Cabinet of Ministers of Ukraine on the basis of a decision taken by the Selection Commission for the National Agency. The Selection Commission is composed of nine members: four international representatives nominated by the E4 organisations (ENQA, EURASHE, ESU and EUA) and 5 national

representatives from Ministry of Education and Science of Ukraine (MoES), National Academy of Science of Ukraine (NASU), National Academy of Educational Sciences of Ukraine (NAES), Federation of Employers of Ukraine (FEU), Ukrainian Association of Students (UAS).

The role of the Selection Commission is to develop the regulations governing the selection competition, establish the qualification requirements, and conduct the selection procedure, which follows these defined stages:

Figure 6. Procedure for NAQA Board members' selection



Source: SAR 2025

The decision is carried out in accordance with the principles of gender balance and subject area representation'.

The term of office for NAQA Board members is three years. The same person may not be a member of NAQA Board for more than two terms. Due to the Martial Law the cadence of current Board was prolonged.

The management activity of the NAQA is performed by its Head and Vice Heads within powers determined in this Statute. These positions are held by members of the NAQA Board and are elected by the Board at its first meeting for a three-year term. In this report, the terms *Head* and *Vice Heads* are used in line with NAQA's official English-language documentation and correspond to the *Chair* and *Vice-Chair* functions.

NAQA operates through several specialised committees and bodies that support its quality assurance functions.

Committees (Regulation on Committees of the National Agency for Higher Education Quality Assurance, 28.05.2025)

NAQA has **four standing committees**, two of which focus on accreditation-related issues. The committee composition (members and size) is determined and approved by the NAQA Board, and members are drawn from the Board itself.

The Study Programme Accreditation Committee reviews applications for one-year conditional accreditation of study programmes in accordance with the Cabinet of Ministers Resolution No. 295 (March 16, 2022) on accreditation under martial law. It also performs other functions delegated by NAQA. It consists of seven members.

The Military Education Committee focuses on enhancing the quality of education in military and special-condition institutions, ensuring compliance with both ESG 2015 standards and NATO principles. It is composed by 6 members.

The other two committees: the Ethics Committee and the Specialised Academic Council Committee perform additional functions outside the ESG 2015 framework.

Appeals Chamber (Regulation on the Appeals Chamber of the National Agency for Higher Education Quality Assurance, 14.02.2025)

Following amendments to the Law on Higher Education (May 2, 2023), NAQA established an independent Appeals Chamber, which officially began operating in November 2024. This Chamber considers appeals against NAQA's decisions in accordance with the procedure specified in the Regulation.

It consists of five members appointed through a competitive selection for a two-year term under civil law contracts. NAQA Board members cannot serve in the Chamber. A member of the Appeals Chamber may be a person who has a higher education, academic degree and/or academic title and at least five years of professional experience in the field of higher education quality assurance.

The selection of the members is done by a competitive selection process. The decision of NAQA to hold the competition and the announcement shall be published on the official website of NAQA

The Chamber's structure, member requirements, and procedures are defined in its official regulations, published on the website.

Advisory Board (Provisions on the Advisory Board of the National Agency for Higher Education Quality Assurance, 23/02/2021)

Established on November 17, 2020, the Advisory Board is a consultative body composed of leading foreign quality assurance experts. It provides strategic and expert advice on stakeholder engagement, alignment with European QA standards, international cooperation, expert training, document development, and the external evaluation of NAQA's activities. Currently, 15 persons are members of the Advisory Body.

Its work is guided by the official Provisions on the Advisory Board.

Experts and Sectoral Expert Councils (Regulation on sectoral expert councils of the National Agency for Higher Education Quality Assurance, 24/06/2025 and Regulation on the Expert and Expert Panels of the National Agency for Higher Education Quality Assurance 15.07.2025)

Study programmes are assessed by trained experts and members of Sectoral Expert Councils (SECs) selected by NAQA. Experts—drawn from academic staff and students—must demonstrate the competence to evaluate educational quality and provide improvement recommendations.

The SECs are permanent collegial bodies. There are 31 Sectoral Expert Councils in total. Each SEC is a standing body composed of 9–15 members, including students, employers, and international experts. SEC members are appointed via open competition through the Procedure for nomination of candidates and election of members of the Sectoral Expert Councils of NAQA and operate in line with the Regulation on Sectoral Expert Councils of NAQA. They participate in the study programme accreditation procedures and post-accreditation monitoring by reviewing expert panel reports, preparing accreditation opinions, and issuing recommendations for programme enhancement.

Commission on work quality assurance of experts (Procedure for the Commission on work quality assurance of experts of the National Agency for Higher Education Quality Assurance, 15.07.2025)

This Commission is a temporary body, whose purpose is an improvement of accreditation examination quality and prevention of improper assessment of study programmes quality by members of expert panels. The Commission considers the facts of bad quality performance of functions assigned by members of the NAQA, staff of Secretariat to experts at accreditation examination.

NAQA Secretariat

The NAQA Secretariat is the permanent operational body of the Agency, responsible for providing organisational, financial, economic, material and technical, and information support for NAQA's activities. It currently comprises 14 departments. As of January 2025, the Secretariat employs 69 staff members, equivalent to 59 full-time positions.

The NAQA Secretariat is led by the Head and a Vice Head. The Head of the Secretariat is appointed by NAQA Board for a five-years term with the right of reappointment. The Vice Head of NAQA's Secretariat is also appointed through a NAQA Board decision. The tasks of the NAQA Secretariat are outlined in ESG 3.5.

NAQA'S FUNCTIONS, ACTIVITIES, PROCEDURES

NAQA currently conducts one type of external quality assurance (EQA) activity within the scope of the ESG: study programme accreditation.

Study programme accreditation

NAQA currently conducts study programme accreditation at bachelor's, master's, and PhD levels. Accreditation of a study programme is mandatory. Higher education institutions may issue a diploma only for accredited study programmes.

A number of study programmes accreditation procedures completed in 2019-2024 are presented in the Table I below.

Table 1. Study programmes accreditation procedures completed by NAQA in 2019-2024

	2019	2020	2021	2022	2023	2024
Accreditation	100	904	1642	778	1365	1064
Conditional	39	292	315	103	163	145
Denial	1	31	25	1	4	3
Exemplary	2	32	53	20	22	18
Total	142	1400	2040	904	1561	1230

Source: SAR 2025

The first Regulations on Study Programmes Accreditation were developed by NAQA in 2019. In its attempt to comply with the ESG, NAQA developed new Regulations on Accreditation of Study Programmes, which came into force on August 1, 2024. The Regulations determine the basic principles, procedures and relevant criteria for accreditation.

Currently there are nine criteria for bachelor and master and an additional criterion for PhD:

- Criterion 1. Design of the study programme
- Criterion 2. Structure and content of the study programme
- Criterion 3. Access to the study programme and recognition of learning outcomes
- Criterion 4. Learning and teaching in the study programme
- Criterion 5. Control measures, assessment of students and academic integrity
- Criterion 6. Human resources
- Criterion 7. Educational environment and material resources
- Criterion 8. Internal quality assurance of the study programme
- Criterion 9. Transparency and publicity
- Criterion 10. Learning through research (this criterion is used for accreditation of study programmes of the third (education-scientific, education-creative) level of higher education)

In response to the serious challenges faced by higher education institutions (HEIs) during wartime, the Cabinet of Ministers of Ukraine adopted Resolution No. 295 (March 16, 2022), which approved the Temporary Accreditation Order for Study Programmes. This order enables NAQA to adapt its quality assurance (QA) processes to the extraordinary conditions caused by the war while ensuring the continuity, stability, and integrity of educational quality. The temporary framework allows for remotely accreditation or conditional (delayed) accreditation and flexible evaluation procedures, ensuring that higher education activities can continue despite the disruptions caused by the war. Details are provided in Chapter 5: NAQA's Quality Assurance Processes and Methodology, specifically in the section "Accreditation During the COVID-19 Pandemic and Under Martial Law.

Furthermore, the Regulations provide for the possibility of conducting simultaneous accreditations, whereby up to three study programmes may be combined within a single accreditation procedure. (more information on ESG 3.1)

About European Approach

The legislation was amended in 2017 to facilitate cross-border QA by recognising accreditation without any additional procedures, for agencies included on the Minister's list, namely the 49 agencies registered on EQAR. Where one of these agencies conducts an evaluation of a joint programme using the European Approach, NAQA receives the documentation and records the programmes onto the national database. At present there are no registered joint programmes, although the regulations have been updated to fully recognise the European Approach.

Universities may also formally request NAQA to conduct an evaluation of a joint programme using the European Approach. This procedure is available and embedded within the programme regulations and the ISC system has the necessary functionality. To date, however, no applications or cases of joint programme evaluations have been made.

About Institutional accreditation

The regulation on institutional accreditation is currently being developed. In order to introduce institutional accreditation practices in Ukraine, NAQA and the Estonian Quality Agency for Education (HAKA) launched a joint project to pilot institutional accreditation in Ukraine. In 2025, the project received financial support from the Estonian Centre for International Development (ESTDEV). Through this Estonian-Ukrainian initiative, three Ukrainian universities underwent a full institutional

accreditation procedure based on HAKA's methodology, which has been adapted to the Ukrainian higher education context.

NAQA'S FUNDING

NAQA's funding comes from the accreditation fees, state budget, grants and charitable contributions. The panel confirmed with representatives of the Ministry that funding is provided by the State under the responsibility of Parliament, with a dedicated budget line for NAQA. This secured line of funding is included in the general state budget. While funding arrangements and budgeting is subject to periodic discussion, the only year where budget constraints arise was in the financial year 2022. The primary funding sources for NAQA in 2024 was HEIs' accreditation fees (68%).

The figure below shows the financial income profile from 2019-2024.

Table 5. NAQA financial incomes for 2019-2024

	2019	2020	2021	2022	2023	2024
Accreditation fees	5547346,55 (20,03%)	29182922,62 (55,84%)	120207362,00 (75,16%)	53851257,31 (59,44%)	93854768,13 (74,07%)	81709432,22 (67,96%)
General State Budget	22109661,44 (79,82%)	21942943,39 (41,99%)	36865943,33 (23,05%)	35712922,98 (39,42%)	32415680,73 (25,58%)	38010287,59 (31,62%)
Grants and Charitable Contributions	43509,27 (0,16%)	1131734,09 (2,17%)	2856140,69 (1,79%)	1034807,71 (1,14%)	432692,85 (0,34%)	504799,72 (0,42%)
	27 700 517,26	52257600,10	159929446,02	90598988,00	126703141,71	120224519,53

Source: SAR 2025

FINDINGS: COMPLIANCE OF NAQA 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

NAQA's original mission, approved in 2019, was to "become a catalyst for positive change in higher education." To achieve this, the Agency shifted the perception of accreditation from a bureaucratic process to a meaningful tool for improvement. In 2024, NAQA thus updated its mission: "To emphasise sustainability, consistency, and the strengthening of a quality culture and security through effective stakeholder partnerships". NAQA's new and current mission is to ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders.

NAQA promotes a quality culture through seminars, training programmes, methodological materials, the "School of Quality," and platforms for sharing best practices.

It is also relevant to highlight the context in which the Agency has operated since its establishment in 2019. NAQA has demonstrated its adaptability in the face of two significant crises with major impact, the COVID 19 pandemic and the Russian invasion of Ukraine. During COVID-19, like other agencies, NAQA introduced a temporary procedure for conducting online accreditation.

The full-scale Russian invasion in 2022 led to the destruction of some HEIs, the loss of lives among students and faculty members, and significant damage to the economy and cultural heritage. As explained in the Review on the quality of higher education in Ukraine (2024) from February 2022 to February 2025 30 higher education institutions were temporarily relocated. Of these, one institution is in the process of reorganisation, one has been reorganised, and three have ceased operations. That implies that 41.157 students enrolled in higher education institutions have been relocated. Despite the difficult conditions, the temporarily relocated higher education institutions continue their educational activities in the new environment, providing access to education for tens of thousands of students. Academic mobility mechanisms were developed, opportunities for inclusive education were expanded, and the role of digital technologies in the learning environment was enhanced.

Higher education institutions continued to consistently develop their internal quality assurance systems using best practices and international experience. In this context. NAQA continued to provide support to adhere to the ESG 2015, offering support to HEIs experiencing significant disruption, and engaging in efforts to strengthen the higher education system. Between 2022-2025 (war time), NAQA has remained fully operational and has conducted 4.812 programme accreditations under the full accreditation procedure.

Currently, the Agency's work is guided by the Strategy of NAQA to 2026 and the National Action Plan on External Quality Assurance for 2024–2026.

NAQA strategic priorities are closely aligned with the National Action Plan, as it has provided a structured framework for bringing the Ukrainian higher education quality assurance system into compliance with ESG 2015 and supporting Ukraine's full integration into the EHEA. It has also defined further steps in NAQA's development towards full compliance with the ESG requirements.

The National Action Plan outlines the following strategic actions:

- Diversification of external quality assurance opportunities in Ukraine
- Implementation of the institutional accreditation
- Further implementation of post-accreditation monitoring
- Regulation of cross-border quality assurance processes
- Enhancement of NAQA expert's skills in line with modern QA request
- Implementation of appeals and complaints procedures.
- Improvement of NAQA analytical activities in accordance with the requirements of the ESG 3.4
- Improvement of the internal QA system of NAQA

According to the SAR, each strategic action is developed into objectives and specific tasks, which include the responsible party and the timeline, the expected outcomes, and an analysis of the associated risks. NAQA regularly reviews the status of the actions proposed in the National Plan.

The main activity of NAQA is programme accreditation. NAQA conducts programme accreditations as part of a cyclical external evaluation (every five years) to ensure and enhance the quality of higher education according to clearly defined criteria. Since 2020, programme accreditation has been mandatory under the Law of Ukraine on Higher Education and the Regulations on Accreditation.

As outlined in the SAR, during 2019-2024 NAQA carried out 7,122 programme accreditations involving site visits to 482 HEIs. The Agency implemented:

- 339 on-site.
- 143 hybrid.
- 6640 online site visits.

In these site visits, the evaluations done by level are:

- Bachelor – 2,635 site visits
- Master – 3,081 site visits
- PhD – 1,301 site visits
- Junior Bachelor – 105 site visits.

In accordance with the Resolution of the Cabinet of Ministers of 16 March 2022 on the peculiarities of accreditation under martial law, all education programmes scheduled for accreditation in the 2021/2022 academic year from 17 March 2022 onward were accredited under one of two procedures:

- remotely, in line with the existing Accreditation Regulations and temporary provisions for video conferencing,
- through a simplified procedure granting conditional (delayed) accreditation without or with partial accreditation examination. The programmes should send the submission to NAQA of an application for accreditation of an education programme and information on the self-assessment of the educational programme. NAQA may decide on conditional (delayed) accreditation under a simplified procedure in case of a motivated request from a higher

education institution located in the temporarily occupied territory and (or) damaged as a result of hostilities, which makes it impossible to conduct the accreditation process.

If we consider accreditations with site visits and conditional (delayed) accreditations under martial law, NAQA reviewed 10,592 accreditation cases from 562 institutions providing higher education programmes (including affiliated structural units).

Accreditation planning begins with the annual schedule for accepting accreditation applications, created based on HEIs' notifications and published through NAQA's Information and Communication System (ICS). The ICS allows stakeholders to track the progress of each accreditation case in real time.

Comprehensive statistics on the number, frequency, and outcomes of accreditation procedures are published each year in NAQA's Annual Reports, available on the official website. The statistics was reviewed by the panel to verify the provided information.

The projections of the initial accreditations for the coming years are as follows: approximately 1,500 programmes are expected to undergo accreditation in the 2026/2027 academic year, around 1,767 programmes in 2027/2028, and about 1578 programmes in 2028/2029.

In addition, the projections for follow-up procedures are 1,180 study programmes in 2026/27, 1,811 study programmes in 2027/28 and 1.320 study programmes 2028/29.

As outlined in its strategic plan (2024-2026), and confirmed to the panel during the site visit, NAQA plans to introduce institutional accreditation. The actions carried out to date include defining the concept and model of institutional accreditation in Ukraine, developing the Temporary Procedure for Institutional Accreditation, and conducting a pilot test with three Ukrainian universities based on HAKA's methodology which was adapted to Ukrainian context. During the site visit, the activity was still not formally implemented. NAQA plans to submit a draft Regulation on institutional accreditation for approval by the Ministry of Education and Science no later than 6 months after the end of martial law

Regarding the accreditation of joint study programmes, including joint study programmes implemented between Ukrainian and foreign higher education institutions, the regulations have been updated to fully recognise and accept the outcomes of evaluation by a foreign accreditation Agency. It is envisaged that the NAQA criteria will be applied in accordance with the European Approach for Quality Assurance of Joint Programmes. Universities within Ukraine can also formally request NAQA to conduct an evaluation of a joint programme using the European Approach. The ICS system is equipped to support this function. At the time of this review, NAQA had not conducted an evaluation of a joint programme using the European Approach and had not received any documentation on the outcome of a joint programme evaluation. No joint programmes are registered on the national database currently. There was therefore no evidence available to the panel to evaluate this procedure.

Stakeholder engagement

Stakeholder engagement is a core principle of NAQA's governance and operations. It extends far beyond representation within NAQA's structures and shapes how decisions are made across the Agency. Over the past six years, NAQA has ensured that stakeholders participate in every stage of decision-making—from strategic planning to evaluating the impact of implemented decisions.

According to the Agency, this inclusive approach integrates perspectives from a wide range of actors, including HEIs, student associations, employers, research institutions, and other organizations. As outlined in the SAR, to ensure transparency, openness, and meaningful participation, NAQA uses multiple mechanisms such as:

- Stakeholder representation in governance bodies: NAQA operates as a permanent collegial body of 23 members, representing academic communities, students, employers, and state authorities.
- Transparent and participatory decision-making processes: Decisions are made by a majority vote of its members, where all stakeholder representatives have equal decision-making rights.
- Inclusive expert panels and Sectoral Experts Councils that include academic staff, students, employers, and international experts.
- Public consultations: NAQA conducts stakeholder surveys among experts, SEC members, HEI representatives, students, teachers, and employers to assess its effectiveness. Also, NAQA regularly engages with stakeholders through national and targeted sector events for HEIs, meetings with employee organisations, and joint training sessions on quality assurance for student associations.
- Annual reporting to national and international bodies: NAQA presents its performance results to the Education and Science Committee of the Parliament of Ukraine each year ensuring public accountability and oversight.

The above activities were confirmed by the panel during the site visit, through several meetings with a wide range of stakeholders, including international partners. All of them confirmed and spoke positively about their active engagement with the Agency.

In 2023, NAQA organised the first meeting of the Ukrainian Quality Assurance Forums (UQAF). To date, three meetings have taken place. The forum is a major annual event dedicated to shaping the future of quality assurance in higher education in Ukraine. Each edition gathers around 1,000 participants and is held over two days, featuring panel discussions, presentations of good practices, and poster sessions showcasing exemplary study programmes. During the site visit, the panel heard of engagement with and value of the forum from stakeholders, in particular the HEIs and Ministries.

Analysis

NAQA plays a central role in the quality assurance and integrity of the higher education system in Ukraine. The Agency's work has had a significant impact on higher education, this was emphasised to the panel by representatives of the HEIs, the Ministry, employer and student representatives. One of the Agency's main goals is to support universities in developing robust internal quality assurance systems, which has proven to be extremely beneficial. This objective is pursued primarily through programme accreditation, which not only serves as an external quality assurance mechanism but also provides structured feedback and guidance that supports institutions in strengthening their internal QA. This approach has proven highly beneficial for the sector.

In addition to programme accreditation activities, NAQA supports internal QA through capacity-building and dialogue with institutions. Initiatives such as the UQAF Forum, provide a valuable platform for promoting and sharing practice within the sector. The panel confirms that NAQA has publicly available mission statements that clearly define its purpose, goals and the core areas of its activity. In its published Strategic Plan, the Agency sets specific objectives and communicates clearly to its stakeholders how and when they will be achieved.

The Strategic Plan proposes objectives that are relevant and well aligned with the Agency's current need.

At present, external quality assurance is primarily based on programme accreditation since its creation.

Since its establishment, NAQA's external quality assurance activities have been primarily based on programme accreditation. While the Agency has introduced measures such as simultaneous

accreditation to reduce the number of site visits, programme accreditation remains the principal mechanism through which quality is assured and enhanced.

The simultaneous accreditation is the evaluation for no more than three study programmes within the same specialty combining educational levels or for no more than three study programmes within the same educational level.

In the context of the large number of programmes within the system, the panel considers that a gradual shift towards institutional accreditation represents a coherent strategic direction. Such a development would further enhance university autonomy while reducing the overall evaluation workload and would build logically on the foundations already established through programme-level accreditation.

In the panel's view, NAQA's engagement with its stakeholders is particularly noteworthy. Despite its strong independence, NAQA maintains very effective and constructive cooperation with public authorities. The Ministry of Education works closely with the Agency through consultations and joint strategic discussions, while fully respecting the principle of non-interference according to several interviews conducted by the panel. This cooperation enables both sides to develop a shared vision for the future of higher education quality assurance, which has proven especially important during wartime. As a result, the quality assurance system has continued to function even under extremely challenging circumstances, and universities have continued to apply for accreditation. Moreover, cooperation extends beyond the Ministry of Education. The Ministry of Internal Affairs actively collaborates with NAQA, particularly in the training of international relations specialists, which is critically important for Ukraine. Similarly, the Ministry of Health works very closely with NAQA; a new law on quality assurance in medical education was developed jointly, and the panel heard that recommendations from NAQA are systematically used to improve professional education.

Discussions on diversifying types of accreditations—including the future introduction of institutional accreditation—and by creating platforms for dialogue and large-scale forums with hundreds of participants, it is the view of the panel that the Agency has helped embed a culture of quality assurance that extends beyond individual institutions and contributes to shaping future generations of academics and professionals.

It was evident to the panel, from the documentation and interviews during the site visit, that students are placed at the centre of the Agency's processes and are actively involved at every stage. NAQA has strongly promoted the student voice, encouraging students to engage with ESG and to participate in discussions on quality.

To sum up, the panel considers that the activities of the Agency are well identified and valued by the different stakeholders. All confirmed that the Agency listens to their concerns and takes them into account, as well as involves them meaningfully in its processes.

Panel commendations-01

The panel commends the Agency in promoting a quality culture and the ESG among the higher educational institutions as well as for its strong engagement with all stakeholders. This achievement is particularly notable given that NAQA is a relatively young Agency that has developed and operates under very challenging circumstances.

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 SAR, and confirmed by the panel, NAQA operates as a public legal entity, founded by the state. The Law of Ukraine “On Higher Education” and the Charter of NAQA, approved by a resolution of the Cabinet of Ministers of Ukraine, define the legal status, tasks, functions, and powers of NAQA:

- Article 17 of the Law states that NAQA is a permanent collegial body; public law entity operating in accordance with this Law and the Charter approved by the Cabinet of Ministers of Ukraine.
- Article 18 Part I of the Law establishes that accreditation of study programmes; conducting post-accreditation monitoring, analysis of the quality of HEIs activities are among NAQA's powers.

The study programme accreditation outcomes are officially recognised in Ukraine and carry legal implications. Accreditation serves as a prerequisite for HEIs to award diplomas of higher education to their graduates, underscoring the mandatory nature of this process. Accreditation results are recognised by the state as a reliable source of data for decision-making. They are used in formulating public policy decisions, including the allocation of state funding for student training.

NAQA is a full member of four international organisations dedicated to quality assurance and academic integrity: International Network for Quality Assurance Agencies in Higher Education (INQAAHE) , Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA), Global Academic Integrity Network (GAIN), European Network for Academic Integrity (ENAI) and also associate to ENQA.

Analysis

During the site visit, the panel confirmed that NAQA has a clearly established legal basis, and it is formally recognised in Ukraine.

It should be noted that beyond its legal recognition, all stakeholders interviewed—including funding bodies—highlighted NAQA's prestige in the country and its role in promoting the standards and values of the European Higher Education Area.

Panel conclusion: compliant

ESG 3.3 INDEPENDENCE

Standard:

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

Evidence

Organisational independence

According to the SAR, NAQA's legal status has undergone significant changes in recent years to safeguard and reinforce the Agency's independence. Before March 2021, Ukrainian law incorrectly defined NAQA as an authority implementing state policy, conflicting with legislation that reserves this role for executive bodies. This misclassification threatened its independence as a quality assurance Agency. Legal amendments adopted on 30 March 2021 to the Law "On Higher Education" removed this misclassification and strengthened NAQA by clearly defining its status as an independent collegiate body (Article 17) and aligning it with ESG standards. The amendments confirmed NAQA as a permanent public legal entity, an Agency free from government interference, and clarified the legal status of its officials to ensure consistency with governance and anti-corruption laws. Provisions implying subordination to state authorities were removed. Overall, these changes reduced political influence, improved objectivity in decision-making, and increased public trust in the Agency.

NAQA's Charter was updated in early 2024 to fully align with these legal changes and confirm NAQA's independence. Moreover, NAQA's Policy on Quality Assurance reiterates that the Agency is not subordinate to executive authorities.

NAQA's governance model also protects independence. Independence is enshrined in the legal text as a structural requirement of the Agency. NAQA Board members are selected through a nationally competitive process: an independent Selection Committee, conducts open calls and assessment for Board appointments. This prevents direct political appointments and reduces the possibility of direct political control or influence over NAQA's decisions.

Members and individuals involved in NAQA's work (such as Board members, experts, and staff) operate on the basis of civil-law contracts rather than as part of the direct public administration, which further strengthens the institutional and functional separation from external influence.

Sectoral Expert Councils (SECs) further bolster NAQA's independence by providing neutral, expert oversight in evaluations. Each SEC is a permanent committee of 9–15 experts drawn from academia, employer representatives, students, and may include international experts. SEC members are appointed through an open competitive selection process (as per NAQA's procedure). Safeguards guarantee SEC impartiality: no more than one member per institution can serve on the same SEC, and certain roles (such as current university rectors, NAQA staff, or NAQA Board members) are ineligible for SEC membership – these rules avoid conflicts of interest. SECs issue advisory expert opinions (not decisions) on each accreditation case; their opinions are forwarded to the NAQA Board for final decision-making. The SECs operate independently within NAQA's framework, adding a peer-review layer that further insulates NAQA's decisions from undue influence.

Operational Independence

The panel heard from the Board, heads and staff of NAQA that the Agency safeguards its autonomy and ensures through its processes that it operates free from external interference, independently setting priorities and decisions in quality assurance. This autonomy ensures that the Agency

independently determines its priorities, makes decisions regarding the execution of its functions, and implements policies in the field of higher education quality assurance.

Its independence is supported by mechanisms such as legal autonomy, NAQA is established by law as a public legal entity that is not subordinated to executive authorities; role separation, during the evaluation the roles between the panel experts, the Sectoral Experts Council and NAQA Board are clearly defined, confidentiality policies, stakeholder feedback, and risk monitoring. Over time, NAQA has strengthened these practices, improving expert selection, conflict-of-interest policies, inclusion of international experts (since 2022), and corruption risk analyses (since 2020). This was confirmed by the panel during the site visit.

All documents supporting NAQA's activities are published and cannot be amended or edited after adoption. This collective and transparent approach ensures that decisions are based on evidence, agreed procedures, and professional judgment rather than individual interests.

Independence of formal outcomes

NAQA guarantees the independence and objectivity of its formal outcomes—expert conclusions, SEC opinions, and Board decisions—by implementing multiple safeguards, such as the role of SECs, the procedure for selecting its members, the participation of international experts, and HEI feedback.

One of the aspects reinforced to the panel during the site visit was the procedural selection of its members. The national selection procedures are public, transparent and open, ensuring that members/staff of the Agency act as public representatives. Calls for applications for vacancies, criteria, and procedures are published on the Agency's website, and the results are documented in official protocols. The panel were advised and confirmed during the site visit that the Register of Experts is regularly updated, and expert panels are composed to avoid conflicts of interest, ensure regional diversity, and promote non-discrimination. Experts must formally declare the absence of conflicts, and any undisclosed ties result in removal from the Register. This approach minimises the risk of corruption and reinforces trust in the Agency's decisions.

As explained in the SAR, international experts have been engaged in Sectoral Expert Councils, expert panels, and the Advisory Board. In addition, international experts review NAQA's Annual Reports and the Reviews on the Quality of Higher Education in Ukraine, contributing to alignment with international standards. Another relevant initiative was the development, in 2022, of the Recommendations for Experts on Reviewing Internal Academic Integrity Policies, prepared within the Academic Integrity and Quality Initiative project, with the support of the American Councils for International Education.

NAQA has established mechanisms for HEI feedback. For example, an expert may be replaced at the request of the higher education institution, provided that the request includes a justification for the conflict of interest; during the accreditation process, the head of the higher education institution can review and provide reasoned comments on the expert panel report. These comments are considered only if supported by evidence, preserving both fairness and rigor. This was confirmed by HEI representatives during interviews with the panel.

The appeals procedures further safeguard independence. NAQA's decisions cannot be overturned by any external body; however, institutions may submit an appeal to an independent Appeals Committee, ensuring legality, fairness, and impartial re-examination when necessary.

Finally, panel observed on the basis of the documentation reviews and the interviews conducted during the site visit, that NAQA places a strong emphasis on transparency and public accountability. Accreditation outcomes, criteria, and related documents (self-assessment reports, external evaluations, SEC opinions, and decisions) are published on the Agency's Information and

Communication System which is publicly accessible. In addition, Board meetings are streamed live on YouTube, thereby enhancing public oversight and reinforcing trust in the Agency's independence.

Together, these mechanisms ensure that NAQA's outcomes are evidence-based, collegial, and protected from external influence. Transparency, structured feedback, and continuous review processes strengthen both the integrity and credibility of its decision-making.

Financial independence

NAQA's budget and staffing are formally approved by the Ministry of Education and Science as a standard administrative procedure for publicly funded institutions, without impacting the Agency's independence. In 2024, the main funding source was HEI accreditation fees, accounting for 68% of the budget. The panel confirmed this during the site visit at the meeting with Ministry representatives.

Analysis

The panel can confirm that independence is one of the core values of the NAQA and is firmly embedded in national legislation and upheld in practice. From its establishment, the Agency was designed to operate independently, following a long and deliberate effort to secure this status. This independence is considered a fundamental principle of the higher education system. Stakeholders emphasised that NAQA's independence is fundamental to Ukraine's quality assurance system, and they actively protect it.

During the site visit the panel heard the Agency is also accountable at the highest level, as it must submit an annual report to Parliament on the quality of higher education. NAQA's obligation to present annual reports to Parliament ensures oversight and transparency without compromising independence, thereby strengthening stakeholder trust in the Agency's outcomes.

Independence is further reinforced by NAQA's working practices. Collective decision-making (expert panels, SEC opinions, Board decisions) and transparency (publication of criteria, reports, decisions) ensures decisions are based on evidence and agreed standards protecting against external influence. The involvement of diverse stakeholders and international experts in SECs adds additional validation and integrity to the processes.

Financial independence is also a crucial aspect of NAQA's autonomy. The Agency receives state funding allocated directly by Parliament, based on a fixed amount. The head of finance in the Agency and the Ministry confirmed that in practice, NAQA receives the funding it requests, ensuring stability and predictability. In addition, universities pay accreditation fees, and the system is designed in such a way that, if necessary, NAQA could continue operating even under a fully self-financing model, with state support guaranteed.

In summary, the review panel is assured and confident that NAQA's independence—organisational, operational, and in terms of its outcomes—is not only formally guaranteed but also practically exercised. All evidence indicates that NAQA functions without third-party interference and that independence is vigilantly maintained by the Agency and valued by its stakeholders. At the same time, constructive cooperation ensures that quality assurance continues to evolve and remain resilient, even in times of crisis.

Panel conclusion: 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.

Evidence

As outlined in the SAR, and on the Agency website, NAQA states that it conducts regular analysis of the outcomes of its external quality assurance activities. Each year, NAQA examines trends in accredited study programmes in Ukraine, including their distribution by education levels, fields of study, and the number of accreditation applications received.

Thematic analysis activities of the Agency focus on the following aspects:

Analysis of the Accreditation Outcomes: NAQA analyses accreditation results to identify systematic trends and patterns

- The Analysis of Major Drawbacks: The list of major drawbacks was introduced by the Agency in 2024. A major drawback is defined as one that violates legal requirements, hinders competency acquisition, or substantially impedes educational service provision. The analysis of the drawbacks includes several dimensions: overall frequency and frequency by criteria, by education levels, fields of study, and types of HEIs. The analysis of major drawbacks supports evidence-based policy decisions, institutional improvement, and the advancement of higher education quality.
- Impact of Accreditation Outcomes on Internal QA Systems: The impact of accreditation outcomes on the development of HEIs' internal quality assurance systems is analysed in the Reviews on the Quality of Higher Education. Since 2022, the key findings have been published as a standalone document—the Review on the Quality of Higher Education—which is available on the website in English. The annual review presents an analysis of accreditation outcomes, systemic trends, and differences by discipline, education level, and institutional type. It also summarises effective and ineffective institutional responses to identified shortcomings and discusses the results of the post-accreditation monitoring pilot. The report highlights actions undertaken to strengthen quality assurance at institutional, national, and cross-border levels, offering recommendations for legislative and policy improvements. It concludes with future prospects and directions for modernising Ukraine's external quality assurance system. In 2020, the Review includes a study titled "Academic Integrity in Ukrainian Higher Education Institutions"
- The Analysis of Best Practices: NAQA systematically examines examples of effective practices identified through the accreditation of study programmes (UQAF-2024: Best Practices, UQAF-2025: Best Practices). These documents are published in English on the Agency's website.

Targeted and Comparative Studies:

NAQA conducts targeted thematic studies based on accreditation results to explore challenges and trends in greater depth. For example:

- "The Quality Assurance System for Professional Pre-Higher and Higher Education During Martial Law" (2022-2023)—a joint survey with the State Service for Education Quality of Ukraine assessing changes in the quality assurance system under martial law and evaluating how educational institutions responded to the security situation.

- “Universities Under Siege: Challenges for the Ukrainian Higher Education System After Russia's Full-Scale Invasion of Ukraine” (2023)—a joint survey with the School for Policy Analysis of Kyiv-Mohyla Academy, assessing changes in the quality of educational services since the start of the full-scale war.

To prepare thematic analyses, the Agency has a structural unit—the Analytics and Training Support Department—which is responsible for monitoring and analysing statistical information on the state and trends of higher education, as well as preparing information and analytical materials on quality assurance in higher education. During the site visit the panel met with staff representatives from this unit, who enthusiastically shared their analytical work and plans in thematic analysis.

Dissemination

The results of NAQA’s thematic analysis are widely used to enhance higher education quality and align with national and international standards. The panel heard that analytical findings help:

- Strengthen legislation: NAQA develops proposals for legal and regulatory improvements in higher education.
- Inform international bodies: It provides data-based insights to organizations like ENQA. For example, NAQA identified violations by some foreign accreditation agencies (e.g., accreditations without site visits or enrolled students) and reported them to ENQA.
- Improve study programme quality: In December 2024, NAQA issued updated guidelines—*Clarifications on the Application of the Criteria for Quality Assessment of the Study Programme*—to ensure fair, transparent, and objective evaluations.

Analysis

The panel acknowledges that, despite the relative youth of the Agency, the thematic analyses conducted are substantial and relevant in number and that the NAQA has created a dedicated department to carry out these analyses.

Each year, NAQA undertakes thematic analyses of accredited programmes, identifying strengths and weaknesses and examining the overall findings of its external quality assurance activities. According to Ukrainian legislation, NAQA is required to prepare and publish the Review on Quality of Higher Education in Ukraine on an annual basis. However, there is no schedule for production of additional thematic analysis.

In the panel’s view, two key elements support the analysis of accreditation results: on the one hand, the high number of evaluation reports, which provide a significant volume of information, and on the other hand, the availability of all evaluations and comments in the ICS database. This enables comprehensive annual analyses. During the interviews with Agency staff, the intention to increase the speed and efficiency of analyses through the use of artificial intelligence was also mentioned. The panel was encouraged by NAQA’s intention to explore GenAI and data analytics to enhance efficiency and depth of thematic analysis.

Based on the evidence collected, the panel is assured that the Agency produces thematic analyses on a regular basis and systematically gathers feedback to support the further development and refinement of quality assurance procedures, as well as to enhance shared understanding among experts. Stakeholder feedback confirmed these thematic analyses are used to drive quality enhancements nationally.

While the thematic studies primarily aim to support improvement within the national context, the panel considers that translating more of these reports into English would be beneficial in order to broaden their dissemination. Furthermore, although most thematic studies are conducted regularly,

the panel also suggests that the Agency develop a structured plan for carrying out thematic analyses on additional topics.

Panel commendations-02

The panel commends the Agency for having a dedicated unit for data analysis, which enables the continuous production of thematic analyses, as well as for the diversity of these thematic analyses and the relevance they have gained within the Ukrainian higher education system.

Panel suggestions for further improvement-01

The panel suggests translating as many thematic analyses and reports as possible into English, to broaden their dissemination.

Panel suggestions for further improvement-02

The panel suggests establishing a formal plan for the upcoming thematic analyses to be carried out.

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

Human resources

NAQA's organisational structure and human resources are described in the SAR and were verified during the site visit. The Agency employs 59 people, including 43 women and 16 men (January 2025).

The staff are organised into 14 structural units, each with clearly defined areas of activity.

The units are divided into three groups:

(i) Study Programmes Accreditations including:

- Study Programme Accreditation Department,
- Expert Support Department,
- Support of Sectoral Expert Councils Department.

(ii) Specialised Councils and Integrity:

- Academic Integrity and One-time Councils' Operation Department

(iii) Support of NAQA Administrative and Economic activities including:

- Preparation of Meetings and Support of the Committees' Work Department,
- Legal Department,
- Leading Specialist on Anti-Corruption Activities,
- Material and Technical Support,
- Records Management,
- Accounting and Financial Support Department,
- HR Department,
- IT Department,

- PR and International Cooperation Department,
- Analytics and Training Support Department

NAQA conducts independent staff recruitment to ensure alignment with its current needs and strategic goals. The selection process, regulated by the Staff Selection Procedure (Order No. 56, December 1, 2023), follows the principles of equality, openness, and transparency, fully complying with Ukrainian legislation and NAQA's internal regulations. Candidates are evaluated based on their experience, education, competencies, and professional and personal qualities relevant to the Agency's functions.

NAQA's overall staffing remains stable, with minor redistribution across structural units. However, the turnover rate was 23% in 2023 and 20% in 2024. It was flagged with the panel that this fluctuation is primarily due to wartime conditions, and that turnover is improving.

The Agency outlined that it faces challenges in maintaining a strong personnel structure due to high qualification standards, competition from better-paid private and international sectors, and the wartime outflow of specialists. To overcome these issues, the Agency promotes continuous professional development, offers flexible working conditions, and fosters a supportive work environment. These measures help retain motivated staff and ensure NAQA's continued contribution to the quality of higher education in Ukraine. NAQA has also introduced onboarding and mentoring mechanisms that facilitate the swift integration of new staff and maintain operational continuity. This was confirmed with staff during the site visit.

As additional evidence requested by the panel, NAQA prepared these three-year human resources forecast, that anticipates a steady increase in staff numbers.

	2026-2027	2027-2028	2028-2029
Fulltime employees (FTE)	57	71	73
Factual number of employees (FTE and part-time)	67	83	90

Source: NAQA - Additional evidence

Financial Resources

The panel were advised that NAQA maintains robust and sustainable financial resources essential for its effective functioning. These funds support external quality assurance, internal process development, analytical reporting, and transparent stakeholder communication. The Agency's income derives from accreditation fees, the state budget, and grants or charitable contributions.

Between 2019 and 2024, total funding increased from UAH 27.7 million to UAH 120.2 million, peaking at nearly UAH 160 million in 2021. Accreditation fees grew from UAH 5.5 million (20%) to UAH 81.7 million (68%), reflecting greater financial autonomy. State funding remained stable (UAH 22–38 million) but declined in share from 80% to 32%, while grants remained below 2%.

As additional evidence requested by the panel, NAQA prepared a three-year forecast of financial resources, including incomes (in thousands of hryvnas):

	Amount		
Indicator	2026-2027	2027-2028	2028-2029
Total Incomes	300.343,65	313.751,85	306.749,57
State budget	41.098,00 (14%)	44.293,80 (14%)	47.489,00 (15%)
Study programme accreditation fees	259.245,65 (86%)	269.458,05 (86%)	259.260,57 (85%)

Source: NAQA - Additional evidence

Staff salaries and operational costs are fully covered by the state budget, ensuring that accreditation volumes do not influence remuneration or decisions, thus safeguarding objectivity and integrity. Despite temporary reductions in 2022 due to martial law, NAQA maintained financial stability through effective cost optimisation and annual financial planning.

The current funding model adequately supports operations, though the Agency acknowledged that additional investment is needed for technological modernisation, particularly to upgrade information systems and integrate new modules for post-accreditation and institutional monitoring.

NAQA actively attracts grant funding for innovation and international cooperation, using it strategically without creating financial dependency. Financial management strictly complies with Ukrainian budget legislation, ensuring stable revenues through transparent fee monitoring, communication with HEIs, and coordinated legal oversight.

All financial reports are publicly available on NAQA's website and the national E-data portal, ensuring accountability. Internal reviews and external audits by the State Audit Service (2021, 2024) confirmed full legal compliance and effective resource management, underscoring NAQA's transparency, efficiency, and financial sustainability.

Analysis

The figures presented in the SAR show that a group of 59 staff members manages an average of around 1,500 programme accreditations annually (between 100 and 200 per person), indicating a high workload among NAQA employees. However, during the interviews, staff emphasised that this workload does not pose a problem due to effective planning across all departments and the use of the ICS database, which supports and manages each step of the programme accreditation process. The panel were provided with a comprehensive video demonstrating the functionality of the ICS database. This is further facilitated by the high level of digitalisation within NAQA.

In the panel's view these figures are impressive, and it would not be possible to manage such a volume of work without the information system that has been in place from the outset. Developed in 2019 and regularly updated since then, the system supports all procedures and document management, which are carried out entirely within the Agency's information system. As the regulations clearly define a sequence of stages, the system ensures efficient workflows and avoids delays related to document exchange or notifications. The panel highlights the ICS database as a strength, noting that it is under continuous development.

The panel also discussed the high staff turnover rate in recent years, which could lead to a loss of knowledge within the organisation. In response to this issue, Agency staff and management stated that this had not been a problem thanks to internal training, the use of detailed internal guidelines, and collaboration among colleagues.

The excessive workload due to a large amount of accreditation procedures and the turnover rate are two weaknesses already identified in the SWOT analysis of the Agency within the SAR. NAQA expects to increase the number of NAQA Secretariat to 30%. Nevertheless, the panel identifies a certain level of risk in human resources management. On the one hand, there is a high workload, although it is supported by technology; on the other hand, staff turnover, although decreasing, may lead to a loss of organisational knowledge.

The Agency also offers opportunities for staff development, which are truly appreciated by the team. The panel was impressed by the team's dedication to work and professionalism.

During the site visit, the financial officer explained that between 65% and 75% of the budget is allocated to accreditation-related payments. The Agency's operational budget can be considered largely independent, as the Agency determines its own priorities and allocates resources accordingly.

The accreditation fees are primarily used to cover experts' fees. When the number of accreditations increases, the overall budget increases accordingly, which helps ensure financial sustainability.

Panel commendations-03

The panel highlights the ICS database and the full digitalisation of the entire accreditation process as a key strength of the Agency.

Panel recommendations-01

The panel recommends that NAQA adopts a risk-based approach to management of both human and financial resources to ensure the sustainability of the Agency's processes as they expand in the future.

Panel conclusion: compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

Evidence

The NAQA Quality Assurance Policy, updated in December 2024 and published on the Agency's website, sets out the principles of NAQA's internal quality assurance system. These include:

- Availability of sufficient and balanced resources for the implementation of external quality assurance processes in higher education.
- Independence.
- Evaluation and improvement of its own activities.
- High professional standards and integrity.
- Prevention of intolerance or discrimination.
- Interaction with the authorities.
- Compliance of NAQA's activities with ESG.
- Information security and accessibility.
- Avoidance of conflicts of interest.
- Accountability.
- Providing mechanisms for feedback and reflection.

The operational framework for implementing these principles is outlined in the "Regulations on the Quality Assurance System of NAQA Activities," approved in May 2025. Its main objective is to ensure that all the Agency's activities (accreditation, evaluation, decision-making, expert work, and administrative processes) are carried out in a transparent, consistent, professional, impartial, and independent manner and are aligned with ESG. The system applies across all NAQA's institutional activities, covering programme accreditation procedures; selection and training of experts; functioning of the Board; development and revision of internal regulations; human resources management; administrative and documentary processes; appeals procedures; and public communication

Responsibilities within the quality assurance system are clearly defined across three levels (strategic, tactical, and operational), and the system's functions and procedures are grouped into four categories:

- Information and analytical,
- Regulatory and advisory,
- Planning and forecasting,
- Control and diagnostic.

As a part of their quality assurance system, NAQA has also formally defined the roles, powers and responsibilities for each position and collegial body.

As part of its internal quality assurance arrangements, NAQA has established a range of external and internal feedback mechanisms.

Externally: HEIs provide feedback after each site visit, and experts complete post evaluation surveys. For example, members of SECs provided structured feedback following the post-accreditation monitoring improving pilot, which was subsequently used to improvement and refine monitoring procedures and follow-up mechanisms. In addition, NAQA publishes analysis reports such as the *Review on the quality of higher education in Ukraine, its compliance with the tasks of sustainable innovative development of society in 2024*, which includes findings from surveys of NAQA experts, SEC members and trained experts.

Internally: NAQA collects feedback from its staff through various mechanisms, such as weekly leadership meetings, departmental discussions, staff surveys, informal communication channels, and a dedicated mechanism for staff suggestions.

NAQA has set clear expectations regarding the competence, professionalism, and integrity of all individuals involved in its work—including Board members, Sectoral Expert Councils, experts, and Secretariat staff. The Agency emphasised that ensuring ethical, responsible, and skilled participation is a fundamental principle of the Agency's operations. To maintain and strengthen these standards, NAQA:

- Selects experts and recruits Secretariat staff based on professional skills, competence, and reputational integrity.
- Organises seminars, training sessions, and webinars to enhance expert qualifications and continuously develop methodological materials.
- Promotes the exchange of best practices in higher education quality assurance.
- Carries out continuous internal monitoring of accreditation quality and the ethical conduct of all participants.

NAQA requires adherence to the Declaration of Academic Integrity from all Board members, experts, Secretariat staff, and others involved in NAQA's activities. The Agency also has developed the NAQA Code of Academic Integrity for Higher Education Quality Assurance, reinforcing a strong ethical culture across the Agency.

NAQA also informed the panel that the Agency has developed a new Anti-Corruption Programme for 2025-2027, a strategic document aimed at ensuring transparency, accountability and integrity in the activities of the NAQA. This programme is based on the results of the assessment of the implementation of the previous Programme for 2022-2024. The Agency reported that no cases of corruption were recorded during the previous programme period. The NAQA Annual Report (2024) indicates that, during 2024, three anonymous reports of possible corruption-related offences and 21 reports of actual or potential conflicts of interest were reviewed.

Analysis

Overall NAQA's internal quality assurance system reflects a continuous improvement approach consistent with the Plan-Do-Check-Act cycle (PDCA). The *Plan* phase is supported by strategic and operational planning; the *Do* phase is implemented through the delivery of evaluation activities, supported by internal regulations and procedures. Review management (Check phase) is mainly based on the monitoring of programme accreditation and expert management, and finally, the system aims at the improvement of processes (Act phase).

During the site visit, the panel observed that performance indicators are in place, particularly in relation to the training of experts and Sectoral Expert Councils, as confirmed in interviews during the site visit. However, the panel noted the limited availability of indicators addressing internal management functions, such as the evaluation of NAQA staff, monitoring of staff development activities, or other operational aspects.

While NAQA demonstrates an ongoing commitment to updating its guidelines and procedures, the panel found insufficient evidence of a structured and forward-looking improvement process specifically addressing internal management systems. Specifically, there appears to be no mechanism for systematically identifying ongoing enhancements or planning improvements for subsequent years. External feedback is gathered through meetings and surveys, and the panel reviewed the report *Review on the Quality of Higher Education in Ukraine, Its Compliance with the Tasks of Sustainable Innovative Development of Society in 2024*, which analyses the results of surveys conducted among 2,489 experts on the accreditation process, as well as feedback from 451 experts who participated in training activities. The panel considers this to be a useful instrument for understanding experts' perspectives and for supporting process improvement. Internal feedback mechanisms rely largely on regular meetings and informal exchanges, and no evidence was provided on the outcomes of staff surveys.

Finally, the panel considers NAQA's anti-corruption framework to be an effective preventive measure. At the same time, the panel confirms the weakness identified in NAQA's own SWOT analysis regarding the absence of formalised procedures for evaluating Secretariat staff, which remains one of the key challenges for the Agency's internal quality assurance system.

Panel recommendations-02

The panel recommends further strengthening the internal quality assurance system to ensure that it is comprehensive, systematic and effective in supporting continuous improvement across all processes. In particular, this could be achieved through the development and consistent use of indicators covering all key processes, and through a more formalised approach to monitoring, analysing and documenting improvements resulting from the various internal and external feedback mechanisms.

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.

NAQA has been an ENQA affiliate since June 2020. This review represents the first ENQA external review of the Agency and is undertaken as part of its applications for ENQA membership and registration in EQAR.

Since 2019, NAQA has consistently strengthened its quality assurance system through self-evaluations. In 2021, NAQA conducted its first self-assessment and developed the National Action Plan (2022–2023) to address identified challenges. External partners such as Slovenian Agency for Quality Assurance in Higher Education (SQAA) and Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA) evaluated NAQA's institutional independence, while participation in the Erasmus+ SEQA-ESG2 project (2022–2025), coordinated by ENQA, supported alignment with ESG.

Furthermore, at the beginning of 2024, NAQA presented a report on the implementation of the National Action Plan on Ukrainian external higher education quality assurance for the 2022-2023 period. The plan enabled several key actions, including strengthening collaboration with the Ministry of Education, updating the accreditation regulations, improving monitoring and expert training, and establishing an independent Appeals Committee. A new National Action Plan (2024–2026) was approved in June 2024 to continue these improvements.

NAQA also conducts an annual ESG-based self-assessment, summarised in the Quality Review, and involves its international Advisory Board in evaluating reports and providing recommendations. Independent evaluations by the Ukrainian Center for European Policy and the Konrad Adenauer Foundation (2023) reflected upon NAQA's resilience and consistency with ESG 2015 during martial law.

One of its strategic goals is to become a full member of the European Association for Quality Assurance in Higher Education (ENQA) and to be registered in the European Quality Assurance Register for Higher Education (EQAR).

Analysis

The present review reflects NAQA's commitment to undergo an external review to determine compliance with the ESG. The Agency's sustained efforts over the years to align its activities with the ESG together with its strategic objectives, and to demonstrate a strong intention to meet the requirements for ENQA membership and EQAR registration.

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

As outlined in the SAR, and confirmed during the site visit, the Law of Ukraine on Higher Education, Article 18, explicitly grants NAQA the authority to develop regulations and methodologies for accreditation. The processes and standards for the external quality assessment of study programmes are outlined in the Regulation on Accreditation of Study Programmes in Higher Education, (version 2024) (ref. N 686 dated 15.05.2024), approved by an order of the Ministry of Education and Science of Ukraine. These Regulations define the main principles and procedures for the accreditation of study programmes in higher education (henceforth “accreditation”) as a tool of external higher education quality assurance in Ukraine. Programme accreditation applies to study programmes implemented in all types of higher education institutions.

The annex to the Regulations describes the ten criteria that are aligned to the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The SAR includes an annex mapping NAQA’s Study Programme Accreditation Criteria to ESG 2015, part I.

The SAR also documents NAQA’s role in supporting internal quality assurance systems within institutions. This support has been provided through research projects such as ERASMUS+ Implementation of Education Quality Assurance System via Cooperation of University Business-Government in HEIs (EDUQAS), annual Quality Reviews that include recommendations for implementing institutional quality assurance systems, as well as active interaction with HEIs to disseminate information and provide advisory support, including discussion forums and thematic webinars.

Support for the ESG as a key element for the improvement of higher education was evidenced in the interviews with the various stakeholders, particularly with representatives of the Ministry, experts, and higher education institutions. The Ministry indicated that the main goal is to assist universities in developing their internal quality assurance systems, which has been considered to be extremely beneficial. Universities have reported positive outcomes from this approach, and students are also well aware of the process. Stakeholders noted that this has contributed to fostering a culture of quality assurance.

During the site visit, the panel learned that the Agency has introduced substantial changes in higher education by placing students at the centre of quality assurance processes. Currently, students are involved at all stages, and their voices are actively encouraged. NAQA has promoted student participation as a key principle, enabling students to engage in discussions on compliance with ESG. The student representatives that the panel met with during the review spoke enthusiastically of their engagement with the Agency and of the positive impact on the student experience in the institutions.

Mapping of the NAQA Study Programme Accreditation Criteria with ESG 2015

Note: The criterion 10 (including 10.1 to 10.7) ‘Learning through research’ only applies to the accreditation of study programmes of the third (education scientific/education-creative) level of higher education.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
I.1 Policy for quality assurance	5. Control measures, evaluation of students, and academic integrity	5.4. The higher education institution has clearly defined and understandable policies and procedures for ensuring academic integrity, which are consistently observed by all participants in the educational process during the implementation of the study programme. The higher education institution promotes academic integrity (primarily through its integration into the institution's quality culture) and uses appropriate technological solutions as tools to prevent violations of academic integrity.
	8. Internal quality assurance of the study programme	8.1. The higher education institution consistently carries out its defined procedures for the development, approval, monitoring, and periodic review of the study programme. 8.2. Students are involved directly and through relevant self-governance bodies in the process of periodic review of the study programme and other quality assurance procedures as partners. Students' proposals are taken into account during the review of the study programme. 8.3. Employers are involved directly and/or through their associations as partners in the periodic review of the study programme and other quality assurance procedures. 8.4. There is an established practice of collecting, analysing, and taking into account information on the career paths of graduates of the study programme (except in the case of first-time accreditation). 8.5. The quality assurance system of the higher education institution ensures a timely response to the results of monitoring of the study programme and/or educational activities related to the implementation of the study programme, including those obtained through surveys of stakeholders. 8.6. The results of external quality assurance in higher education (in particular, comments and recommendations formulated during previous accreditations) are taken into account during the review of the study programme. 8.7. A quality culture of education is formed within the academic community of the higher education institution, which contributes to the continuous development of the study programme and educational activities under this programme.
	10. Learning through research	10.7 The higher education institution ensures compliance with academic integrity in the professional scientific activities (creative) supervisors and postgraduate students (adjuncts), in particular, takes measures to prevent the exercise of scientific (creative)

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
		supervision by persons who have committed violations of academic integrity.
I.2 Design and approval of programmes	1. The design of the study programme	1.1. The study programme enables the achievement of learning outcomes defined by the higher education standard for the relevant specialty and level of higher education. In the absence of an approved higher education standard for the relevant specialty and level of higher education, the programme learning outcomes are approved by the higher education institution and must comply with the requirements of the National Qualifications Framework for the corresponding qualification level.
		1.2. The content of the study programme takes into account the requirements of relevant professional standards (where available). Study programmes that provide for the awarding of professional qualifications must ensure compliance with the requirements of the relevant professional standards.
		1.3. The study programme has a clearly formulated objective that corresponds to the mission and strategy of the higher education institution.
		1.4. The objective of the study programme and the programme learning outcomes are defined taking into account the needs of stakeholders.
		1.5. The objective of the study programme and the programme learning outcomes are defined taking into account trends in the development of science, the specialty, the labour market, the sectoral and regional context, as well as the experience of similar national and foreign study programmes.
	2. The structure and content of the study programme	2.1. The volume of the study programme and its individual educational components (in European Credit Transfer and Accumulation System credits) complies with legislative requirements regarding the volume of study programmes for the relevant level of higher education and the relevant higher education standard (where available).
		2.2. The content of the study programme has a clear structure; the educational components included in the study programme constitute a logically interconnected system and, taken together, enable the achievement of the stated objective and programme learning outcomes. The content of the study programme ensures the formation of general cultural and civic competencies and the achievement of programme learning outcomes that provide for the learner's readiness to independently analyse and identify patterns of social processes.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
		2.3. The content of the study programme corresponds to the subject area defined for the relevant specialty (or specialties, if the study programme is interdisciplinary).
		2.7. The volume of individual educational components (in European Credit Transfer and Accumulation System credits) complies with legislation, the actual workload of learners, and the programme learning outcomes.
		2.8. The structure of the study programme and its educational components ensure the practice-oriented nature of the study programme or are aligned with the tasks and specific features of the dual form of education (where this form is implemented within the study programme).
		2.9. The study programme ensures that students acquire competencies aimed at achieving the global Sustainable Development Goals by 2030, proclaimed by United Nations General Assembly Resolution No. 70/1 of 25 September 2015 and defined by Presidential Decree of Ukraine No. 722 of 30 September 2019.
	5. Control measures, evaluation of students, and academic integrity	5.2. The forms of attestation of higher education students comply with the requirements of the higher education standard (where available). Learning outcomes are confirmed by the results of the unified state qualification examination for specialties for which it has been introduced.
I.3 Student-centred learning, teaching and assessment	2. The structure and content of the study programme	2.4. The structure and content of the study programme provide opportunities for forming an individual learning pathway, in particular through the individual choice of courses by higher education students within the volume by legislation.
		2.5. The study programme and the curriculum provide for practical training of higher education students, which enables them to acquire competencies necessary for further professional activity.
		2.6. The study programme provides for the acquisition of social skills by higher education students.
	3. Access to the study programme and learning outcomes recognition	3.4. Within the framework of the study programme, the higher education institution recognises learning outcomes acquired through non-formal and/or informal education. Such recognition is carried out in accordance with clear and understandable rules that do not contradict legislation and are accessible to all participants in the educational process.
		4.1. The educational process complies with legislative requirements. Teaching and learning methods, tools, and

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
	4. Teaching and learning under the study programme	technologies contribute to the achievement of the objectives and programme learning outcomes stated in the study programme, comply with the requirements of the student-centred approach, and adhere to the principles of academic freedom.
		4.3. The higher education institution ensures the integration of teaching and research during the implementation of the study programme in accordance with the level of higher education, the specialty, and the objective of the study programme.
		4.5. Teaching, learning, and research are linked to the internationalisation of activities within the study programme and the higher education institution.
	5. Control measures, evaluation of students, and academic integrity	5.1. The forms of assessment and the criteria for evaluating higher education students are clear and understandable, make it possible to determine the extent to which learning outcomes have been achieved for individual educational components and/or the study programme as a whole, and are published in advance.
	8. Internal quality assurance of the study programme	8.2. Higher education students are involved directly and through relevant self-governance bodies in the process of periodic review of the study programme and other quality assurance procedures as partners. Proposals from higher education students are taken into account during the review of the study programme.
	10. Learning through research	10.1. The content of education and research (education and creation) programme ensure comprehensive training of post-graduate students (adjuncts) to solve complex problems in the field of professional and/or research and innovation activities in the relevant specialty (specialties) and/or field of knowledge (fields of knowledge), mastery of the methodology of scientific and pedagogical activities.
		10.5. The higher education institution provides opportunities for involving post-graduate students (adjuncts) in international academic community in their specialty, in particular through presentations at conferences, publications, concerts, performances, master classes, personal exhibitions, public speaking, participation in joint research (creative art) projects, etc.
I.4 Student admission, progression, recognition and certification	3. Access to the study programme and learning outcomes recognition	3.1. The rules for admission to study under the study programme are developed in accordance with the Conditions (Procedure) for admission to higher education, are clear and understandable, do not contain discriminatory provisions, and are published on the official website of the higher education institution.
		3.2. The rules for admission to study under the study programme take into account the specific features of the programme.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
		3.3. Within the framework of the study programme, the higher education institution recognises programme learning outcomes and qualifications obtained in other study programmes (including during academic mobility). Such recognition is carried out in accordance with clear and understandable rules that do not contradict national legislation and international legal instruments, are accessible to all participants in the educational process, and are consistently applied. The recognition procedure and the decisions taken are duly documented in accordance with legislation.
	4. Teaching and learning under the study programme	4.2. All participants in the educational process are provided in a timely manner with accessible and understandable information on the objectives, content, and programme learning outcomes, as well as on the procedures and criteria for assessment within individual educational components (in the form of a course syllabus or course description).
	5. Control measures, evaluation of students, and academic integrity	5.1. The forms of assessment and the criteria for evaluating higher education students are clear and understandable, make it possible to determine the achievement of learning outcomes for individual educational components and/or the study programme as a whole, and are published in advance. 5.3. Clear and understandable rules for conducting assessment activities are defined (including those related to the research component of educational and research programmes for the preparation of Doctor of Philosophy candidates). These rules are accessible to all participants in the educational process, ensure the objectivity of examiners (including procedures for preventing and resolving conflicts of interest), define the procedure for appealing assessment results and for re-assessment, and are consistently applied during the implementation of the study programme.
	10. Learning through research	10.3. The higher education institution is able to establish ad hoc specialized scientific councils (ad hoc specialized councils for awarding the degree of Doctor of Arts) for the attestation of postgraduate students (adjuncts) enrolled in the respective study programme.
I.5 Teaching staff	6. Human resources	6.1. Teaching staff involved in the implementation of the study programme, by virtue of their qualifications and/or professional experience, are capable of delivering the educational components they teach within the study programme, taking into account the requirements for teaching staff established by legislation. 6.2. Competitive selection procedures for teaching staff are transparent and non-discriminatory, enable the required level of professionalism to be ensured for the successful implementation of the study programme, and are applied consistently.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
		6.3. The higher education institution involves employers, their organisations, practitioners, and industry experts in the implementation of the educational process.
		6.4. The higher education institution supports the professional development of teaching staff through its own programmes or in cooperation with other organisations and encourages the development of teaching excellence.
	10. Learning through research	10.2. The scientific (educational and creative) activity of post-graduate students (adjuncts) corresponds to the direction of research (creativity) of scientific (creative) supervisors.
I.6 Learning resources and student support	4. Teaching and learning under the study programme	4.4. Pedagogical, academic-pedagogical, and research staff (hereinafter referred to as teaching staff) systematically update the content of educational components based on scientific achievements and contemporary practices in the relevant field.
	7. Educational environment and material resources	7.1. The teaching and learning support of the study programme, as well as financial and material-technical resources (software, equipment, library, and other infrastructure, etc.), ensure the achievement of the objectives of the study programme and the intended learning outcomes defined by the study programme.
		7.2. The higher education institution ensures access for teaching staff and higher education students to appropriate infrastructure and information resources necessary for learning, teaching, and/or research activities within the study programme, in accordance with legislation.
		7.3. The educational environment enables the needs and interests of higher education students enrolled in the study programme to be met and is safe for their life and physical and mental health.
		7.4. The higher education institution provides educational, organisational, informational, advisory, and social support, as well as support for the physical and mental health of higher education students enrolled in the study programme.
		7.5. The higher education institution creates adequate conditions for the realisation of the right to education for persons with special educational needs enrolled in the study programme.
		7.6. There are regulated anti-corruption policies and procedures for responding to cases of bullying, discrimination, sexual harassment, and other conflict situations, which are accessible to all participants in the educational process and are consistently followed during the implementation of the study programme.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
	10. Learning through research	10.4. The higher education institution organizationally and materially provides opportunities for conducting scientific research (creative projects) and validating their results in accordance with the research topics of postgraduate students (adjuncts) (holding regular conferences, seminars, colloquia, concerts, performances, master classes, personal exhibitions, public presentations, and providing access to laboratories, equipment, information, and computing resources, among others). 10.5. The higher education institution provides opportunities for involving post-graduate students (adjuncts) in international academic community in their specialty, in particular through presentations at conferences, publications, concerts, performances, master classes, personal exhibitions, public speaking, participation in joint research (creative art) projects, etc.
I.7 Information management	8. Internal quality assurance of the study programme	8.4. There is an established practice of collecting, analysing, and taking into account information on the career paths of graduates of the study programme (except in cases of first-time accreditation).
	9. Transparency and publicity	9.2. No later than one month prior to the approval of a study programme or amendments thereto, the higher education institution publishes the relevant draft on its official website in order to receive comments and proposals from stakeholders.
I.8 Public information	9. Transparency and publicity	9.1. Clear and understandable rules and procedures regulating the rights and obligations of all participants in the educational process are defined, are accessible to them, and are consistently followed during the implementation of the study programme.
		9.3. The higher education institution ensures open access on its website to information and documents in accordance with legislation. The higher education institution timely publishes on its official website accurate and reliable information about the study programme (the study programme in full, curricula, course syllabi, and opportunities for forming an individual learning pathway for higher education students) in a scope sufficient to inform relevant stakeholders and society.
I.9 On-going monitoring and periodic review of programmes	8. Internal quality assurance of the study programme	8.1. The higher education institution consistently carries out its defined procedures for the development, approval, monitoring, and periodic review of the study programme.
		8.2. Students are involved directly and through relevant self-governance bodies in the process of periodic review of the study programme and other quality assurance procedures as partners. Students' proposals are taken into account during the review of the study programme.

ESG	Standard for the Study Programme External Quality Evaluation of NAQA	Criteria of NAQA
		8.3. Employers are involved directly and/or through their associations as partners in the periodic review of the study programme and other quality assurance procedures. 8.4. There is an established practice of collecting, analysing, and taking into account information on the career paths of graduates of the study programme (except in the case of first-time accreditation). 8.5. The quality assurance system of the higher education institution ensures a timely response to the results of monitoring of the study programme and/or educational activities related to the implementation of the study programme, including those obtained through surveys of stakeholders. 8.6. The results of external quality assurance in higher education (in particular, comments and recommendations formulated during previous accreditations) are taken into account during the review of the study programme. 8.7. A quality culture of education is formed within the academic community of the higher education institution, which contributes to the continuous development of the study programme and educational activities under this programme.
I.10 Cyclical external quality assurance		Cyclical external quality assurance (every 5 years) is obligatory since the study programme accreditation is a mandatory prerequisite for issuing a higher education diploma to a person who has completed the relevant study programme and passed certification.

Analysis

The *NAQA Regulation on Accreditation of Study Programmes in Higher Education* explicitly cites to the ESG as its basis. It is evident to the panel that the NAQA Regulations, including the accreditation criteria, are structured around the ESG and reflect the Part I standards I.1 to I.10.

The panel examined in detail the mapping between the ESG and the NAQA criteria. The following analysis examines the degree and nature of alignment between the two frameworks.

ESG Standard I.1 Policy for quality assurance, the ESG requires institutions to establish a publicly available quality assurance policy integrated into institutional governance and developed with stakeholder participation.

NAQA Criterion 8 (Internal Quality Assurance of the Educational Programme) provides direct evidence of compliance. Criterion 8 requires institutions to demonstrate the existence and functioning of internal quality assurance mechanisms at programme level, including regular review procedures, stakeholder involvement, documented quality assurance policies, and improvement measures. The requirement that institutions provide evidence of implemented QA procedures rather than merely

formal policies, emphasizes integration of QA into institutional governance and stakeholder participation. Furthermore, NAQA requires documented proof that programme-level QA processes are connected to institutional strategy, thereby evidencing systemic implementation rather than isolated compliance.

The panel notes that NAQA's accreditation criteria require extensive evidence of formal internal QA arrangements at programme level, requiring institutions to demonstrate regular programme monitoring, stakeholder involvement, and quality culture initiatives. At the same time the panel observes that the criteria do not explicitly require institutions to have a formally articulated and publicly available institutional QA policy. The panel further notes that NAQA has issued [a document](#) (*Guide for the Application of the Quality Assessment Criteria for Educational Programmes*), which states under sub-criterion 8.7 that 'the internal quality assurance policy is a key component of the HEI's strategic management'. This reflects a clear recognition of the importance of an internal QA policy at institutional level. In addition, the panel acknowledges the transparency-related expectations under criterion 9 implicitly support public availability of internal documents.

The panel considers that the criteria do not make sufficiently explicit the expectation that institutions should have a formal, published quality assurance policy. It suggests that NAQA strengthen the framework by introducing a clear requirement for institutions to publish their internal QA policy, thereby improving clarity and transparency.

ESG Standard 1.2 on the design and approval of programmes, the ESG emphasizes that programmes should be designed with clearly defined learning outcomes aligned with qualification frameworks and subject to formal approval procedures.

NAQA Criterion 1 (Design and Objectives of the Educational Programme) provides strong evidence of alignment. Criterion 1 requires that programme objectives be clearly defined, consistent with the National Qualifications Framework, and developed with stakeholder consultation. It also requires documented procedures for programme approval and review. The explicit requirement that learning outcomes be formulated in measurable terms and correspond to qualification descriptors directly reflects ESG 1.2, which mandates clarity of intended learning outcomes and formal approval processes. Additionally, NAQA's emphasis on stakeholder involvement in programme design.

ESG Standard 1.3 Student-centred learning, teaching, and assessment, the ESG calls for flexible pedagogical approaches, fair assessment practices, and recognition of diverse learning paths.

This requirement is developed through two criteria, NAQA Criterion 2 (Structure and Content of the Educational Programme) and Criterion 4 (Teaching and Learning). Criterion 2 requires that programme structure, credit allocation, and educational components ensure achievement of learning outcomes, thereby supporting constructive alignment. Criterion 4 requires transparent assessment procedures, published grading criteria, mechanisms for student feedback, and measures ensuring academic integrity.

ESG Standard 1.4 Student admission, progression, recognition, and certification. The ESG requires transparent, consistently applied regulations governing the entire student lifecycle.

This ESG is reflected in NAQA Criterion 3 (Access to the Educational Programme and Recognition of Learning Outcomes). Criterion 3 requires clear and publicly available admission rules, transparent procedures for recognizing prior learning, and documented mechanisms governing progression. It also requires consistency between admission requirements and programme objectives. These elements ensure that student pathways are governed by transparent and consistently applied regulations.

ESG Standard 1.5 Teaching staff, the ESG stipulates that institutions must ensure the competence of their academic staff and support professional development.

NAQA Criterion 6 (Human Resources) provides direct evidence of compliance. Criterion 6 establishes requirements regarding academic staff qualifications, professional experience, sufficiency of staffing for programme delivery, and ongoing professional development. Institutions must demonstrate that staff profiles correspond to the programme's educational objectives. NAQA's evaluation of documented staff CVs and workload allocation further strengthens this standard. correspondence.

ESG Standard 1.6 Learning resources and student support services.

NAQA Criterion 7 (Educational Environment and Material Resources) requires evidence of adequate infrastructure, library access, digital platforms, laboratory facilities (where relevant), and student support services. The accreditation process assesses whether available resources are sufficient for achieving programme learning outcomes

ESG Standard 1.7 Information management requires institutions to collect, analyse, and use relevant data for effective programme management.

NAQA Criterion 8 (Internal quality assurance of the study programme) requires institutions to collect and analyse data on student performance, graduation rates, employment outcomes, and stakeholder feedback. It also requires demonstration that such data are used for programme improvement.

ESG Standard 1.8 Public information, requiring institutions to publish clear, accurate, and objective information about their programmes and qualifications.

This standard is reflected across multiple NAQA criteria, especially Criterion 1 (Design of the study programme) and Criterion 3 (Access to the study programme and recognition of learning outcomes), which require publication of programme descriptions, learning outcomes, admission rules, and other essential information. Moreover, accreditation results themselves are publicly available.

ESG Standard 1.9 Ongoing monitoring and periodic review of programmes. The ESG emphasizes continuous improvement through regular evaluation cycles.

NAQA Criterion 8 (Internal quality assurance of the study programme) requires demonstration of cyclical programme monitoring, documentation of improvement measures, stakeholder feedback integration, and follow-up on recommendations from previous accreditation procedures. The emphasis on continuous quality enhancement reflects ESG 1.9's improvement-oriented logic.

ESG Standard 1.10 Cyclical external quality assurances establishes that institutions should undergo cyclical external quality assurance consistent with ESG principles

The regulatory framework institutionalises cyclical external evaluation in accordance with ESG.

Beyond formal accreditation, NAQA actively supports higher education institutions in developing their internal QA systems through capacity-building activities. The SAR documents NAQA's – and stakeholders confirmed – that the Agency shares good practices and guidance to help institutions improve their own quality processes. For instance, NAQA has participated in European projects (e.g. ERASMUS+ EDUQAS) to research internal QA strategies, regularly disseminates findings via annual national quality review reports, and organises discussion forums and thematic webinars for HEIs and their staff. The panel noted the Ministry's view that NAQA's work has been very impactful in helping universities build up their internal QA systems. NAQA's advisory role is carefully delineated from its evaluation role: its guidance is delivered in general settings and through non-binding recommendations, not in one-to-one consultancy to individual institutions. The panel confirms that these supportive,

sector-wide initiatives (e.g. peer learning events, thematic webinars, QA conference) are intended to contribute to a quality culture without compromising NAQA's impartiality in accreditation decisions.

The panel reviewed several programme accreditation reports that confirmed that all the standards are incorporated in the accreditation processes. Discussions with representatives of the Ministry, quality assurance officers, experts and heads of higher education institutions noted that NAQA's external quality assurance is designed to enhance programme quality by focussing on the effectiveness of the institutions' internal quality assurance systems.

Stakeholders consistently emphasised NAQA's role in promoting quality assurance systems within higher education institutions. The evidence considered by the panel during the review indicates that internal quality assurance has contributed to greater institutional autonomy, strengthened quality culture, and reinforced the integrity of processes.

The panel confirms that programme accreditation as defined by the current Regulations, recognises and reinforces the institutional responsibility of higher education institutions and addresses the effectiveness of internal QA processes in HEIs.

Panel recommendations-03

The panel recommends that NAQA strengthen its criteria by explicitly requiring institutions to have an approved, publicly available quality assurance policy.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

Evidence

The SAR explains that in 2019, NAQA's main task was to develop a new external quality assurance methodology aligned with ESG 2015. A draft was published for public consultation, with feedback gathered from HEIs, employers, students, and other stakeholders. After revisions and agreement with the Union of HEI Rectors, the Ministry of Education and Science of Ukraine approved the methodology in July 2019.

The document "Roles, Powers, and Responsibilities within NAQA's Quality Assurance System" explains that the NAQA members approve NAQA Quality Assurance Policy and the Regulations on the Quality System of NAQA.

The panel were advised that programme accreditation is defined through methodological documents, internal procedures, and evaluation tools in a transparent, participatory, and legally compliant manner. Two types of documents exist:

Regulatory legal acts:

- *The Regulation on the Accreditation of Study Programmes in HE (2024)* is the core document that defines the accreditation procedure. This document is a regulatory legal act. It was noted in the

SAR and confirmed by the panel during the site visit that stakeholder representatives are involved in its development. Prior to approval, a public consultation is conducted. The document is developed by NAQA and is approved by the Ministry of Education and Science of Ukraine in accordance with the Law of Ukraine “On Higher Education” and taking into account the fact that NAQA is not a public authority and therefore cannot issue regulatory legal acts.

- *Regulation on the Appeals Chamber of the National Agency for Higher Education Quality Assurance (2025)* (explained in ESG 2.7).

Internal procedures and evaluation methods

The following documents operationalise accreditation processes, guide experts and Sectoral Expert Councils, and ensure consistency of evaluations that are developed and approved internally by NAQA:

- Procedure for Forming the Schedule for Accepting for the Study Programme Accreditation (2020, updated in 2021 and 2024);
- The Procedure for the Consideration of Complaints and Appeals of Higher Education Institutions regarding the Accreditation of Study Programmes at the NAQA (explained in ESG 2.7);
- Regulation on the Expert and Expert Panel of the NAQA (2024, updated in 2025);
- Procedure for the Work of the Commission on Ensuring the Quality of Experts’ Performance at NAQA (2023, updated in 2024, 2025);
- Regulation on Sectoral Expert Councils of the NAQA (2022, updated in 2023, 2024, 2025);
- Procedure for Nominating Candidates and Electing Members of Sectoral Expert Councils (2022, updated in 2023, 2024, 2025).

All the above documents were available to and reviewed by the panel.

The development of the institutional accreditation methodology represents an example of NAQA’s approach to the design, consultation, and approval of external quality assurance processes.

In 2021, NAQA produced an analytical overview and a set of recommendations on the implementation of institutional accreditation within the framework of the project “Improving Human Rights-Based Approaches in Higher Education”, implemented jointly with the OSCE. In 2023, following a series of consultations with governmental authorities, a proposal was submitted to introduce institutional accreditation into the Law on Higher Education. This resulted in the inclusion of Article 25 on Institutional Accreditation of Higher Education Institutions.

During 2024 and 2025, the joint project “Enhancement of Higher Education Quality in Ukraine”, implemented by HAKA (Estonia) in cooperation with NAQA, focused specifically on the development and piloting of the institutional accreditation model. During the site visit the panel met with a representative of HAKA, and of an institution involved in the pilot institutional accreditation project.

In 2025, a dedicated working group—comprising representatives of NAQA, higher education institutions, students, employers, the Ministry of Education and Science, the Parliament, and student unions—presented the Concept for the Modernisation of External Quality Assurance in Higher Education in Ukraine, which includes the institutional accreditation framework.

In the future, NAQA Head advised the panel of the Agency’s plans to further develop the Regulation on Institutional Accreditation, establish the internal mechanisms necessary for its implementation, and create a new structural unit within the NAQA Secretariat, including the formation of an Institutional Accreditation Department. As explained before, the current circumstances of Marshall law have led to this process being put on hold for now.

Analysis

For the purposes of this standard the panel's analysis is based on the external quality assurance procedures that are currently operational, namely programme accreditation. While NAQA has engaged in preparatory and consultative work relating to the future introduction of institutional accreditation, including stakeholder consultations and pilot initiatives, this process is not yet implemented and therefore does not form part of the panel's assessment of compliance with ESG 2.2 at this stage.

Currently, the Agency operates only one external QA one procedure: programme accreditation. The same methodology applies to bachelor, master's and doctoral studies, and to the cluster and delayed approach. The development of this methodology has involved all relevant stakeholders, and there is evidence that the Agency refines its approach in response to feedback collected (ESG 3.6). During the interviews it was made evident that NAQA holds periodic meetings with the government, HEIs, employers, and students. These meetings address general issues related to external quality assurance processes and requirements. HEIs, stakeholders and the government regard NAQA as a key reference point for reforms in higher education in Ukraine.

The panel considers that NAQA develops its external quality assurance standards and criteria for programme accreditation in an open and targeted way, with all documents agreed through a process involving the multiple key stakeholders.

Panel commendations-04

The panel commends NAQA for its proactive efforts and approach to involve all stakeholders in the development and implementation of its programme accreditation methodology.

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

As outlined in the SAR and explained to the panel during the site visit, the accreditation of a study programme is conducted for the first time when, at the start of the accreditation procedure, students from the programme's first cohort have completed at least 60 per cent of the European Credit Transfer and Accumulation System (ECTS) credits required for that study programme.

By the beginning of the academic year, NAQA Secretariat develops a draft programme accreditation schedule and submits it to NAQA Board for approval. The schedule takes into account the number of study programmes for which the higher education institution has submitted a notification of intent to accredit, the feasibility of grouping study programmes for simultaneous accreditation audit, and planned graduation dates for students

The university can notify NAQA the intention to carry out simultaneous accreditation of several study programmes. A simultaneous accreditation examination may be conducted for no more than three study programmes within the same specialty combining educational levels or for no more than three study programmes within the same educational level, in the Appendix of the regulations there is a list of compatibility of specialties for the simultaneous accreditation procedure. Study programmes leading to professional qualifications in professions for which additional regulation is required cannot be included in a simultaneous accreditation.

The formed groups of study programmes for simultaneous accreditation examination are combined in the schedule for simultaneous submission of the application for accreditation and self-assessment reports.

The process of devising the schedule was explained to the panel by the Agency staff. The NAQA procedure for study programme accreditation, described in the *Regulations on Accreditation of Study Programmes in Higher Education, point II. Accreditation*, and explained to the panel during the site visit, includes the following steps:

1) Preparation of a study programme self-evaluation report by the HEI

Preparation of a self-evaluation report by the higher education institution, which must include the application, programme profile, curriculum, or links to electronic resources confirming the information provided in the study programme and reviews from employers. To guide institutions in this task, NAQA issues a template for preparing the self-evaluation report.

2) An external assessment conducted by an expert panel

Within ten working days of the accreditation application, NAQA appoints an expert panel composed of at least three members, including one student, and sometimes a representative of employers if requested. In the case of the simultaneous accreditation examination of two or three study programmes, the review panel were advised that the composition of the expert panel is increased by one or two experts, respectively.

The expert panel analyses the self-evaluation report and related documentation before conducting a site visit.

3) A site visit

Normally lasting three days, the visit includes meetings with students, academic staff, employers, administrators, as well as inspections of resources. During the COVID-19 pandemic and under martial law, site visits are often conducted remotely or in hybrid formats, supported by specific regulations.

NAQA is expanding on-site visits to Ukrainian HEIs where safety allows. NAQA advised the review panel that if an institution is displaced, in conflict-affected areas, or damaged due to conflict, the expert panel visits take place remotely or in hybrid form to ensure security under martial law. This approach is explained in the *Regulations on Accreditation of Study Programmes in Higher Education 7.7* : “Accreditation may be conducted in a remote or hybrid form based on a decision by NAQA if the higher education institution has been temporarily relocated, is situated in areas affected by active or past hostilities, has been damaged or destroyed as a result of hostilities, or due to the circumstances of educational activities under the study programme during martial law, ensuring the safety of all participants in the accreditation process”.

The panel confirmed that NAQA has followed a consistent approach reflecting these criteria. If physical visits are impractical or pose safety risks (e.g. due to security and safety concerns), NAQA opts for hybrid or remote format, as permitted by its regulations. Under normal conditions, however,

a full on-site review remains the default requirement, aligning with the Agency's procedures. For programmes leading to regulated professional qualifications, accreditation must involve at least partial on-site evaluation. Overall, NAQA applies a fit-for-purpose approach in choosing between physical, hybrid, or remote formats.

4) Preparation of the expert panel's report

Following the visit, the expert panel prepares an external evaluation report, which is uploaded to NAQA's system and can be commented on by the HEI within three days. Since 2021, the Secretariat has checked draft reports for compliance with requirements, and since 2023, experts have received training in report writing.

The external evaluation report includes:

- General information about the study programme,
- Analysis, strengths and weaknesses of study programme by each criterion, evaluated according a four-level scale.
- A report summary and recommendations.

5) Review by the Sectoral Expert Council

The next stage is the review of the report by the SEC, which issues an opinion containing recommendations for improvement and an assessment of compliance with criteria. Each criterion is evaluated according to a four-level scale (A- Full compliance, B- Compliance; E-Partial compliance; F: Full non-compliance. More detail in ESG 2.5). This four-level scale (A, B, E, F) is used consistently throughout the accreditation process, informing the expert panel's assessment, the SEC's expert opinion, and the NAQA Board's final decision.

In particular, the SEC is expected to carry out an independent and well-reasoned review of the expert panel report, taking into account the self-assessment materials, accreditation documents, and all relevant evidence. It must provide detailed and justified analysis in the information system, particularly when modifying EP assessments or confirming compliance levels such as A, E, or F.

The SEC is also responsible for verifying whether the expert panel reports regarding the quality of study programmes and educational activities are reliable, accurate, and sufficiently justified. Where necessary, the SEC must explain and justify any disagreements with the expert panel report assessments. In addition, it has a stronger role in identifying exemplary, innovative, or unique practices within study programmes, explaining why these practices are considered good examples and how they could be disseminated or replicated in other institutions.

Another important function of the SEC is the identification and justification of shortcomings related to accreditation criteria, including deficiencies that may not have been highlighted in the expert panel report. Furthermore, the SEC must formulate clear and reasoned recommendations aimed at improving study programmes and educational activities, while respecting the autonomy of higher education institutions. These recommendations become especially important when compliance levels are assessed as B, E, or F.

Higher education institutions and expert panels are given the opportunity to submit reasoned comments on the draft SEC opinion through the National Agency's information system. The SEC is responsible for reviewing and considering these comments when preparing the final version of the SEC opinion, reinforcing its role as the body that ensures balanced, evidence-based, and fair decision-making.

During the site visit the panel heard from representatives of the sectoral council that during the SEC meeting also the revised draft opinion is discussed in the presence of representatives of the higher

education institution and expert panel. This creates an additional level of dialogue, accountability, and transparency, while allowing the SEC to clarify and justify its conclusions directly with the stakeholders involved. After which the representatives of the expert panel and HEI are moved to a virtual waiting room, while the SEC discusses the outcome and makes its opinion. On rejoining the meeting, the institution is informed of the opinion of the SEC, and the SEC confirms its opinion to NAQA.

The final SEC opinion must be clearly documented, including the meeting date, the SEC members involved in preparing recommendations, the participating representatives of the higher education institution and expert panel, and the voting results approving the opinion.

Programmes related to defence are reviewed in the same sequence, but the SEC's opinion in these cases is broader, as there are more participants in the committee than in the expert group.

6) A decision by NAQA

Based on the external evaluation report, the SEC opinion, and the HEI's input, the NAQA Board makes a final decision. Possible outcomes include exemplary accreditation, accreditation, conditional accreditation (for one year), denial, or re-accreditation. Conditional accreditation requires the HEI to correct identified shortcomings within a year.

7) Post-accreditation monitoring

In 2021, NAQA identified the need to improve follow-up procedures for external quality assurance at programme level. Initially, follow-up applied only to programmes with conditional one-year accreditation, allowing HEIs to fix shortcomings.

From 2022–2023, developing a systematic post-accreditation monitoring process became a national priority. In 2023, legal changes granted NAQA the power to conduct such monitoring, and in 2024 the new Accreditation Regulations introduced it formally.

The review panel were advised that post-accreditation monitoring takes place in the third year after accreditation and assesses how HEIs have implemented recommendations. The process includes self-evaluation by the HEI, pre-expert checks, this phase has the objective to verify the correct documentation submitted by HEI and to provide the necessary informational and organisational support for the process, the SEC meeting where the members analyse the results of post-accreditation monitoring review, and NAQA Board decision. Outcomes can be either successful completion or a requirement for further improvements within a set deadline.

Piloting began in 2024 with eight HEIs in February and 30 in autumn, and it became mandatory for all accredited programmes from September 2024. Full implementation is a priority of the 2024–2026 National Action Plan.

Conditional (delayed) Accreditation

After the full-scale invasion in 2022, the Ukrainian Government adopted Resolution No. 295 (March 16, 2022), introducing a temporary order for study programme accreditation under martial law. This measure enables one-year conditional (delayed) accreditation with partial external evaluation. It aims to prevent disruptions to education and graduation, ensure the validity of accreditation certificates, and provide a legal framework for awarding degrees when standard accreditation procedures could not be implemented under martial law.

Between 2022 and 2024, HEIs could apply for conditional (delayed) accreditation if their programmes' accreditation periods had expired, and full external evaluation was not feasible. The use of this mechanism was significant: 892 cases in 2022, 1,213 in 2023, and 1,307 in 2024, representing roughly

44–52% of all accreditation decisions. In 2025, the number declined significantly to 497 cases (29.9%), reflecting improved capacity to conduct standard evaluations.

From the 2024/25 academic year, NAQA restricted conditional (delayed) accreditation to relocated HEIs, institutions with special learning conditions, and force majeure cases caused by the war. With the adoption of the new Regulations on Accreditation (September 2024), all study programmes are now required to undergo the full accreditation procedure, including face-to-face or hybrid site visits, except in exceptional security-related circumstances. This confirms that conditional (delayed) accreditation was a temporary emergency measure, not a substitute for regular quality assurance.

NAQA's information system (ICS) allows for a detailed view of each stage of every accreditation process, providing information on timelines, the bodies responsible for approval, and the evidence generated at each stage.

Analysis

NAQA carried out more than 7.000 programme accreditations between 2020 and 2024, all of which followed the established phases of the accreditation process. In the interviews with experts and institution representatives, all consistently agreed that the phases of the process are clear and well-structured and documented, contributing to a shared understanding of the process among stakeholders. During the site visit, the panel took time to understand and clarify the role of the Sectoral Expert Councils. Interviews confirmed that the SECs operate at subject level, where they review whether accreditation criteria have been correctly applied and to support the accreditation decision. Institutions may meet with the councils to raise questions regarding the expert report and the opinion of the SEC, thereby ensuring that concerns can be discussed and clarifications provided.

The panel heard that the SEC opinion in most cases coincides with the expert panel, NAQA Board considers both decisions, the expert panel report and the SEC opinion, this supports the final accreditation decision by the Board. In instances where the expert panel supports accreditation, but the SEC has some reservations, these are noted and sent to NAQA Board, the Board makes the final decision. The panel confirmed that all SECs work according to the same evaluation criteria, working on the same platform, with a common list of shortcomings which is used. In the structure of the SEC opinion there is sub-criterion related to how the HEI has reacted to the previous recommendations, SEC considers how the HEI has responded, this also contributes to post-accreditation monitoring. The panel also heard from representatives that NAQA regularly organises different meetings and courses for SEC members on the procedures.

Given the large number of accreditations, the panel considers that the SECs play an important role in ensuring that assessments are consistent and transparent across all evaluations, and that all aspects of the evaluation are clearly justified.

The panel's discussion with several SECs provided strong evidence of the added value of the sectoral approach in ensuring consistency, comparability and quality enhancement across a very large and diverse system. Across all SECs reviews are conducted using identical criteria, common self-assessment report templates and a shared digital platform. This uniform framework ensures consistency of standards across all specialities and institutions. The SEC's access to the database of accreditation cases further strengthens consistency, as SEC members consider previous evaluations and recommendations and the institutional response, enabling them to assess whether institutions have demonstrated improvement over the accreditation period.

In the professionally oriented fields, the SECs also facilitate meaningful stakeholder involvement. For example, in the Civil Security SEC which covers programmes preparing graduates for roles in national police, border guards and emergency services, employer participation was described as particularly critical under current conditions. Employers contribute directly to evaluations, ensuring that

programmes respond to societal needs, including issues arising from the war context, such as documentation of war crimes and the continuous professional development of teaching staff. The panel considers this employer engagement to be a significant strength of the SEC model.

Similar benefits were identified in technical disciplines. In the Electrical Engineering SEC, the panel heard that evaluations are grounded in legally defined requirements and a mandatory set of documents to be included in SARs. The IT SEC further illustrated the complementary roles of expert panels and SECs. While expert panels conduct detailed programme-level assessments, the SEC reviews the coherence and sufficiency of the evaluation, taking into account previous recommendations and institutional responses.

The panel notes that it required sometime during the review visit to fully ascertain the different decision-making points within the programme accreditation process, as these were not clearly described in the self-assessment report. The respective roles and sequencing of decisions only became fully clear through interviews with members of the SEC and Agency staff during the site visit.

The panel also notes the introduction of conditional (delayed) accreditation implemented during the period 2022–2024 as a pragmatic and proportional response to exceptional circumstances of martial law. This mechanism enabled institutions to maintain their accreditation cycles and ensured the continuity of external QA processes during a period of significant disruption.

The panel finds that the review process performed by NAQA is pre-defined, implemented consistently and published. However, with regard to the follow-up (post-accreditation monitoring) stage, the panel noted that while this stage is defined in current regulations and pilot tests have been conducted, there is not yet a consistent or systematic approach to its implementation. Full implementation is planned for 2026.

Panel commendations-05

The panel commends NAQA for its ability to adapt accreditation processes during martial law, ensuring they remained fit for purpose and allowed the continuity of quality assurance, safeguarding the interests of students in exceptional circumstances.

Panel recommendations-04

The panel recommends developing a concise and coherent description of the programme accreditation process, including links to relevant criteria and guidelines and decision-making points. Such an approach would enhance transparency and provide a more comprehensive understanding of how the process operates in practice.

Panel recommendations-05

The panel recommends that NAQA implement the follow-up stage at the earliest opportunity to ensure alignment with the standard.

Panel conclusion: partially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

Evidence

As outlined in the SAR, NAQA has a database with 4885 experts, including 811 students, and 113 international experts (99 academic and 14 students).

The panel were advised that the Register of Experts includes representatives of all fields of study, ensures gender balance, diverse regional representation, and the inclusion of higher education and research institutions with different ownership types and governance structures.

Programme accreditation is carried out by expert panels that are normally composed of academic experts and include at least one student member. NAQA's regulatory framework permits the optional inclusion of a labour-market (employer) representative on expert panels where a formal request is submitted by an employer, employers' organisation, or professional association within the prescribed timeframe.

NAQA provided a list to the panel detailing the number of experts by role (teaching staff, the students, and the international experts (academic and students)) by specialty for the last two academic years. Student experts are represented in all specialties (around 90 specialties).

The document Regulation on the Expert and Expert Panels of the National Agency for Higher Education Quality Assurance, last amended in 15.07.2025, sets out:

- Procedure of selection persons for the Register.
- Keeping the Register.
- Formation of expert panels.
- Expert evaluation of study programme.
- Assessment of quality of the expert's work.
- List of typical situations with conflict of interests in which an expert of the NAQA may find himself or herself.

Candidates for inclusion on the register are approved by NAQA Board.

Selection

Before announcing an expert selection call, NAQA analyses upcoming accreditations to determine the types of experts required. NAQA recruits academic staff experts as needed for each specialty and continuously recruits student experts. According to NAQA, there have been no reported difficulties in recruiting experts; calls for applications are always open. In general, two calls are issued per year.

Candidates are selected for inclusion in the Register of Experts based on the criteria outlined in the *Regulation on the Expert and Expert Panel of NAQA*. These include experience in higher education quality assurance, policy development, and international engagement. Candidates may apply for up to three fields of knowledge. For students, additional criteria include involvement in student self-governance or the National Student Association of Ukraine.

The selection process consists of several stages:

- NAQA publishes a call for experts on its website, including the selection criteria.

- Candidates submit an application, including their CV.
- The NAQA Secretariat reviews all submitted applications and verifies the candidates' qualifications. Candidates are shortlisted based on their experience and qualifications.
- Shortlisted candidates must complete an online training course. At the end of the course, they are tested, and a minimum score of 60 out of 100 is required to pass.
- Candidates who successfully complete the online course, which covers the criteria and the ESG, are invited to participate in a training session.
- During the training session, candidates are assessed based on their performance.
- Following approval by the NAQA Board, successful candidates are included in the Register of Experts.

The multi-factor selection process, combined with a standardised evaluation scale, ensures a structured, transparent, and consistent expert selection system.

In one academic year, experts typically participate in 2–3 site visits. Rarely, depending on the specialty, it may be 4 or 5. Therefore, new experts must be selected as well. NAQA provided data on the rotation rate among experts, illustrated in the table below.

The rotation rate

	2023-2024		2024-2025	
	Teaching staff	Students	Teaching staff	Students
Added to the register	819	332	193	283
Removed from the register	189	290	59	274
Number of persons in the register at the end of the reporting period	4054	971	4188	1113

Source: SAR

The review panel was advised that NAQA requires strict adherence to the Declaration of Academic Integrity from all experts involved in NAQA's activities. The names of the members are publicly available, and their mandate is revised every three years (defined by Article 21 of the Higher Education Law).

Training

In order to ensure the professional quality of the work of its academic experts and student experts, NAQA advised, and it was confirmed by the panel during the site visit, that the Agency regularly conducts training seminars, video conferences, webinars, and briefings on the accreditation procedure prior to inclusion in the register and participation in external evaluation. Participation in the training is mandatory for all experts.

The Agency also develops various types of training materials, including manuals, videos and case studies. Specialised training is provided for chairs and members of Sectoral Expert Councils. In addition, NAQA regularly organises thematic webinars and sectoral seminars and develops methodological materials, manuals and instructions for participants in the accreditation process, such as the methodological manual "*Higher Education Quality Assurance in Ukraine, 2025*". This manual highlights the practical aspects of study programmes accreditation, including, the procedure, stages of expert assessment, application of the Criteria for Assessing the Quality of the Study Programme, requirements for the expert panel report, and the principles of academic integrity for experts.

The *Train the Trainer Programme "Ukraine's New Accreditation System: Building on UK Best Practice"* was developed with the support of the British Council and trainers from the QAA (UK) to prepare 38 prospective trainers from various regions of Ukraine. Simultaneously, NAQA created a two-day introductory training program for expert candidates. Over a six-month period from September 2019

to February 2020, these trainers conducted 95 training sessions to prepare 1,806 experts (1,423 academic staff representatives and 383 students) who were included in the Register of Experts. Since then, NAQA has continuously updated the initial training content for expert candidates to address emerging needs. From 2020 to 2024, NAQA held a total of 179 training sessions for expert candidates, with over 5,000 participants.

The current programme (version 4.0 from year 2022) includes one MOOC on accreditation procedures and another MOOC on report writing, as well as several video lectures and a one-day training session during which an accreditation process is simulated.

The panel was granted access to the training materials which are comprehensive and include training sheets detailing the learning outcomes to be achieved, the teaching methods applied—such as case study analysis, individual and small group work, participant presentations, and working with documents like sample self-assessment reports and accreditation case materials—as well as the content and assessment methods. For example, the *Training for Future Accreditation Experts* module has a workload of 30 hours, including eight hours of practical work. There are also training sessions for experts and for members of the SECs on how to write reports.

In 2024, NAQA took decisive action by collaborating with the Ukrainian Association of Students (UAS) to develop the *UAS QA POOL* training programme. This initiative is designed to provide potential student experts with the necessary knowledge and skills in quality assurance and to highlight their vital role in these processes. Through this programme, NAQA aims to close the gaps in understanding and motivation that may lead to declining student participation. Currently, five UAS QA POOL training sessions have been held in person in different regions of the Ukraine. Together with Ukrainian Student League NAQA has designed the training programme “Students as Quality Ambassadors”.

Composition

Expert teams for programme accreditation are composed of at least three members, one of whom is a student. All members hold equal rights. The chair has additional responsibilities including organizing the overall workflow of the expert panel.

An employer representative may be included in the expert panel, based on a formal request from an employer, employer’s organisation, or professional association. Where such a request is accepted in accordance with NAQA procedures for forming expert panels, the employer representative participates with the same rights and responsibilities as other panel members. The participation of the employer’s representative in the accreditation of the study programme is optional and funded by the employer, organisation (association) of employers, or professional association that submitted the application.

To ensure a global perspective in external evaluations NAQA places particular emphasis on experts with significant international experience, particularly those who have studied or worked study or work in foreign HEIs or and quality assurance agencies.

Expert’s evaluations

During the site visit, NAQA staff explained that the experts’ performance is evaluated after each procedure based on their work. The programme leader evaluates experts after the site visit and before the final decision, which helps reduce conflicts of interest and increases objectivity. Experts also evaluate each other. In addition, the quality and usefulness of experts’ evaluative feedback during the accreditation process are assessed.

Experts are evaluated on how well they meet deadlines and fulfil their responsibilities. This assessment forms the basis of their final score:

- Below 60: experts are removed from the Register of Experts.
- 60–69: experts are required to participate in additional training.
- 70–100: no issues are identified, although additional training may still be offered.

Analysis

In the panel's view, NAQA effectively manages a large number of experts each year (approximately 3000 experts).

Regarding the number of experts in the database, it is noteworthy that student experts are represented in all specialties (around 90 specialties).

The Agency uses predefined, clear and published criteria to select experts for evaluation panels and ensures that they have no conflict of interest. All panel members sign the Code of Ethics and institutions are consulted about any potential issues in this respect.

With regard to competence development, the panel confirms that all the interviewed experts possessed extensive knowledge of the evaluation processes. The experts, including students, expressed appreciation for the support provided by NAQA as well as the usefulness of the guides and templates provided.

The panel highlights the expert selection and training process. In particular, experts are required to complete the training programme and successfully pass an assessment before being included in the register and becoming eligible to participate in accreditations. The training materials are comprehensive and cover both methodological aspects and practical skills required to perform the role of an expert. The MOOCs developed by NAQA are a good example of the quality and completeness of the training materials. For instance, on 23 October 2025, the 400th training session for experts of the *NAQA Leadership in an Expert Group* took place.

Regarding the composition of the expert panels, the review panel notes that each expert panel is composed of two academic experts and always includes one student member. Students have the same rights and responsibilities as the other panel members.

Employer representatives are not usually part of expert panels. However, they are represented in SECs, which ensures labour-market input is included before the final decision. This keeps expert panels focused on academic and student judgement, while allowing SECs to add wider views on programme relevance and employability. Overall, the panel finds this approach balances expertise in peer review and meets the expectations of the standard.

NAQA is making efforts to increase the participation of international experts; in 2024, NAQA involved 113 international experts. This number is considered adequate, taking into account the limited number of international experts who speak Ukrainian and the current national context.

All evaluated institutions expressed satisfaction with the competence and independence of the expert panels.

NAQA has in place a mechanism for the evaluation of experts' performance by both the institutions and panel members. In cases where an expert does not meet the minimum required level, the expert may be removed from the register or required to repeat the training.

Panel commendations-06

The panel commends the Agency for the comprehensive training provided to experts, particularly the quality of the training materials and the clear requirements for inclusion in the Register of Experts.

Panel commendations-07

The panel commends the Agency for its partnership with the National Students League in developing training programmes that support students' active participation in internal quality assurance.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

A study programme, and the educational activities under such a programme, is to be evaluated for compliance to each criterion according to the following four-level scale described in the *Regulations on Accreditation of Study Programmes in Higher Education*:

- Level A – Full compliance. The study programme fully meets the defined criterion; innovative and exemplary practices are identified and there is an absence of drawbacks.
- Level B – Compliance. The study programme meets the defined criterion in general, but minor drawbacks are identified.
- Level E – Partial non-compliance. The study programme does not meet the defined criterion in general, but the major drawbacks identified can be eliminated within a one-year period.
- Level F – Full non-compliance. The study programme does not meet the defined criterion, and the major drawbacks. drawbacks are fundamental and make it impossible to implement the study programme in a quality manner.

(Note: Letters C and D are not used.)

Based on the conclusions of the experts and the SECs, the NAQA Board may adopt one of the following decisions on the programme accreditation:

- Exemplary accreditation: compliance at level 'A' is established for five or more criteria, including relevant criteria.
- Accredited: compliance at level 'A' is established for fewer than five criteria or compliance at level 'A' is established for five or more criteria, but not for relevant criteria. No criterion is assessed at level E or F.
- Conditional accreditation: compliance at level "E" is established for no more than three criteria, and no criterion is assessed at level "F". Conditional accreditation places the HEI on probation for one year, during which it must address the identified conditions and undergo follow-up.
- Non-accredited: Compliance at level "E" is established for four or more criteria, or compliance at level "F" is established for at least one criterion. In this case, the institution must undergo a new accreditation procedure and demonstrate how previous recommendations have been addressed.

(Note: The final decision of a programme accreditation could be “conditional accreditation”, this denomination is different from a “conditional (delayed) accreditation”, that means a simplified procedure. The translation of these terms into English may create confusion for the reader).

In addition to the Regulations, to support experts in applying the assessment system NAQA has developed a set of systematic clarifications contained in its instructional and methodological documents to increase clarity, transparency, and consistency in external evaluations. These include:

- *Recommendations on the application of criteria for assessment of the quality of study programmes (2020).*
- *Clarifications on the Application of the Criteria for Assessing the Quality of Study programmes (2024).* These clarifications assist experts in determining the level of compliance for each criterion and in substantiating their assessments. They explain the expected requirements for study programmes and internal quality assurance systems, reference ESG 2015 and Ukrainian legislation, and offer guidance on how to justify identified drawbacks.
- *The List of Major Drawbacks (2024, updated in 2025)* that provides a structured, unified framework for determining compliance levels with accreditation criteria. It helps expert panels systematize identified shortcomings, ensures objective and transparent assessments, and strengthens trust in accreditation results. *The Instruction on the application of the List of Major Drawbacks (2025)* in the accreditation expertise process, which establishes the rules for using the List in the assessment process.
- *Instruction for the Experts of the NAQA on Organising the Work of the Expert Panel during External Evaluation (2025).* This document describes, for each stage of the process, the tasks and responsibilities of the experts panel members, and highlights attitudes and practices that are not recommended during their work.

To ensure consistent evaluation outcomes and coherent decision-making across subject areas—especially given the high number of accreditation cases—NAQA introduced an additional verification stage at the SEC level. The SEC reviews the quality and consistency of external evaluation reports, clarifies recommendations, and may either confirm the expert panel’s proposed compliance levels or suggest changes. The panel was advised that this added step strengthens reliability and uniformity across accreditation decisions.

NAQA has developed *Guidelines for Members of the Sectoral Expert Councils of the NAQA on organising work during the accreditation review process (2025)*. This document describes, for each stage of the process, the tasks and responsibilities of the SEC's members, and highlights attitudes and practices that are not recommended during their work.

The data in the SAR show that between 2019 and 2024, in 88% of cases, the expert panel, the SEC, and the NAQA Board reached a unanimous decision on the accreditation outcome.

Analysis

NAQA has established four levels for assessing each standard and four levels for the final decision on programme accreditation. The criteria used to determine the type of decision are well described and objective: on the one hand, the number of criteria is taken into account, and on the other hand, not all criteria carry the same weight within the evaluation. The panel considers these criteria to be coherent and clearly defined.

The panel analysed the results presented in the thematic analysis ‘Review on the quality of higher education in Ukraine, its compliance with the tasks of sustainable innovative development of society in 2024’ and observed that in 2024, the decision to accredit with the definition of “exemplary” in 2024 was made for 18 study programmes (1.5%), the decision on accreditation was made in respect of

1,064 study programmes (86.5%) and the decision on conditional accreditation in 2024 was made in respect of 145 study programmes (11.8%). The panel considers that the distribution of results is coherent, with a limited number of exemplary accreditations and conditional accreditations.

The criteria described in the Regulations are intended to be applied consistently, and the set of clarifications produced by NAQA aim to ensure that accreditation outcomes are interpreted uniformly by expert panels. The panel confirmed that the explanations of the criteria are regularly updated to ensure consistency in expert judgment.

The main additional mechanism to ensure consistency is the role of the Sectoral Expert Councils, composed by experts organised in 31 sectoral commissions. All the experts' reports are reviewed by one SEC, whose members verify decisions are applied consistently across the different panels.

Consistency over time within the SECs is supported by the relative stability of their membership, which helps mitigate fluctuations in interpretation and enables comparisons of decisions over time. Furthermore, in addition to specific training, one of the eligibility requirements for SEC membership is prior experience as an expert, ensuring familiarity with accreditation procedures.

The panel found that the decision-making process for programme accreditation is well understood by the external experts as well as the institutions. Experts interviewed confirmed that the criteria are applied consistently and appropriately. During the site visit, no concerns were raised regarding differences in the application of the criteria. Nevertheless, the efforts to apply the criteria consistently, was not always fully evident to the panel, mainly due to the high number of accreditation decisions undertaken and the number of experts and members of the SECs. In addition, the panel identified a potential risk related to consistency between different SECs, as no specific measures to ensure cross-SEC consistency were identified during the site visit.

On one hand, the panel notes the efforts of NAQA, and the mechanisms established to promote consistency in the application of accreditation criteria. These include the role of the Sectoral Expert Councils in reviewing decisions over time, improvements to the explanations of criteria, and the structured training provided to experts, which facilitates shared understanding and knowledge exchange.

On the other hand, the panel is of the view, that given the scale of operations, reliance on shared memory among actors presents a risk to maintaining consistent decision-making. Institutionalising this knowledge would support clearer follow-up, enhance transparency, and reduce variability across such a large accreditation system.

Panel recommendations-06

The panel recommends that NAQA continue to strengthen measures to ensure consistent application of accreditation criteria across all evaluations. This could include enhanced monitoring of expert reports, additional guidance on interpreting criteria, and periodic calibration exercises for expert panels and SECs.

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

Once the site visit is completed, the reporting and decision-making process proceeds through four stages described in the Regulations on Accreditation of Study Programmes in Higher Education: the expert panel report, the expert opinion of the Sectoral Expert Council and the NAQA Board decision. In addition, where post-accreditation monitoring applies, a post-accreditation report is produced as part of the follow-up stage.

1. Expert panel report

The expert panel must draft a report within the timeframe specified in its appointment and submit it to NAQA.

Upon receiving the draft report, NAQA verifies its compliance with legislation and the established requirements for its format. If the draft report does not meet the legal provisions in the field of higher education or the requirements for its format, it is returned to the expert panel.

The report is considered complete once signed by all expert panel members. Any member who fully or partially disagrees with the assessment of compliance with the criteria and/or recommendations must sign the report and attach a separate opinion justifying their position; this opinion becomes an integral part of the report.

After submission, the head of the higher education institution and the guarantor of the study program are granted access to the report in the ICS to review and provide reasoned comments on the report or to notify the absence of such comments within three working days.

As explained in the SAR, the external evaluation report includes:

- General information about the study programme,
- Analysis, strengths and weaknesses of study programme by each criterion,
- A report summary and recommendations.

NAQA provides templates for both the expert panel report and the Sectoral Expert Council Opinion.

2. Expert opinion of the SEC

To prepare a draft expert opinion, the Chair of the SEC or their deputy appoints a speaker from among the SEC members within three working days following submission of the expert panel report to the SEC through the ICS system.

The SEC opinion is developed on the basis of the expert panel report and the evidence collected during the external quality assurance procedure as documented in the accreditation file within ICS. The SEC does not conduct a new evaluation of the study programme; nor does it gather additional evidence. Its role is to evaluate the consistency, substantiation and completeness of the expert panel's findings. The SEC opinion contains:

- well-sustained proposals regarding the level of compliance with each criterion.
- recommendations for improving the study programme and related educational activities within the programme.

The head of the higher education institution has the right to provide reasoned comments on the draft opinion of the SEC within three working days of receiving access to the draft expert opinion through the ICS system.

Following this step, the accreditation case and the draft SEC opinion are formally considered at a meeting of the SEC. The SEC adopts its expert opinion by a majority vote of its members and subsequently forwards the complete accreditation case, including the SEC opinion, to the NAQA Board for final decision-making.

As described in the SAR, the SEC opinion includes a justified assessment of the study programme against the accreditation criteria. The SEC opinion may also include follow-up action recommendations.

3. NAQA Board decision

Finally, considering the external evaluation report, the SEC opinion, and the HEI's responses, the accreditation decision is considered at the NAQA Board meeting.

NAQA has the right to make a decision to return the accreditation case to the SEC for reconsideration if the opinion of the SEC does not contain a justification for compliance with the criteria or the SEC violated the procedure for reviewing the accreditation.

The Regulations do not explain the content of the reports or what documents should be published.

4. The post-accreditation report (pilot phase)

This report includes an analysis of the recommendations issued for each criterion during the previous accreditation process, the level of their implementation (implemented, partially implemented, or not implemented), recommendations for further improvement, and overall conclusions.

Analysis

The panel verified that all the Agency's reports, including those on the outcome of external QA processes, are published in full on the website through the Accreditation Database (ICS), which is the single integrated platform used by HEIs, experts, and NAQA staff to manage accreditation processes. The ICS, available in Ukrainian, provides a substantial amount of information, and its filtering tools allow reports on the Agency's accreditation processes to be searched efficiently. The presentation of information is consistent across all reports. Each completed process results in the same set of documents: the expert panel report, the opinion of the Sectoral Expert Council, and the NAQA Board decision. While the panel confirmed that accreditation reports — including expert panel reports, SEC opinions, and final Board decisions — are published in full and in a consistent manner through the ICS database, it may be challenging for users who are not directly involved in accreditation processes (such as students, employers, or external stakeholders) to locate and interpret final outcomes within the volume and structure of information available. Further measures to support access, signposting, or guidance for public users could strengthen the visibility and practical accessibility of published reports.

Regarding the structure of the reports, they provide clear and relevant information for HEIs. The panel reviewed several reports with different accreditation outcomes and confirmed that they follow a common structure.

The expert panel report is divided into five parts:

- (I) General information and links related to the programme.
- (II) A summary including good practices, shortcomings, and recommendations.
- (III) A detailed analysis in which each criterion and its sub-criteria are assessed, concluding with an overall evaluation that includes identified strengths, weaknesses, recommendations, and the assigned level of compliance.
- (IV) Other observations, where additional comments on the programme, educational activities, or the accreditation procedure may be presented; and
- (V) Conclusions, including a table summarising the level of compliance for each criterion and the expert panel's decision.

The SEC opinion report presents the results of its consideration of the accreditation case, including the number of experts supporting or opposing the outcome. It contains an analysis of each criterion and provides justification for confirming or rejecting the expert panel's conclusions.

In the eight SEC opinion reports translated to English and analysed in detail by the panel, no discrepancies were found among the 11 or 13 members who made up the panel.

The NAQA Board decision report sets out the final decision, including its justification based on the expert panel report and the SEC opinion.

All reports indicate the levels of compliance achieved for each criterion and list the experts involved in the evaluation. In the panel's view, the reports are comprehensive, well-argued, and supported by examples and links to evidence.

As part of the pilot phase of programme follow-up (post-accreditation monitoring), the panel had access to two examples of follow-up reports translated into English. These reports include an analysis of the recommendations issued for each criterion during the previous accreditation, the level of their implementation (implemented, partially implemented, or not implemented), recommendations for further improvement, and overall conclusions. The reports are based on substantial evidence and clearly identify both areas of good practice and areas for improvement, making them a valuable tool for the follow-up process.

The SEC does not amend or rewrite the expert panel report or opinion. The expert panel report remains a distinct and unchanged document throughout the accreditation process. The SEC issues a separate and formally distinct expert opinion which is based on consideration of the expert panel report and full accreditation file available on the ICS system.

In reviewing an accreditation case, the SEC assesses the quality, coherence, and substantiation of the expert panel's findings and conclusions. Where the SEC identifies issues requiring clarification, refinement, or—exceptionally—proposes an alternative view on the level of compliance with specific criteria, these views are expressed exclusively through the SEC opinion, not by altering the expert panel report itself. On this basis the panel is assured there is no procedural risk of the SEC making substantial changes to the expert panel report. The Agency's practice of sharing the expert panel report with the evaluated higher education institution prior to final decision-making enables the institution to verify factual accuracy and to submit reasoned comments or objections. These comments are considered as part of the overall accreditation file reviewed by the SEC and the NAQA Board, without affecting the integrity of the original expert panel report.

Panel commendations- 08

The panel commends the Agency for ensuring transparency and publishing accreditation reports through the ICS database, and on the governance of the report process.

Panel suggestions for further improvement- 03

The panel suggests that NAQA further enhances the user-friendliness and navigability of access to final accreditation reports for general public users within the ICS system.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

Evidence

Appeals

The appeals process is outlined in the SAR and was confirmed to the panel during the site visit, by the Agency Heads and members of the Appeals Chamber.

Prior to the adoption of the Amendments to the Law of Ukraine “On Higher Education” (May 2, 2023), the Appeals Committee, composed of NAQA Board members, was responsible for appeals consideration. After May 2023, following the adoption of the Amendments to the Law and the approval of the Regulations on the Appeals Chamber of the National Agency for Higher Education Quality Assurance, an independent body – the Appeals Chamber was established.

The Regulation on the Appeals Chamber of the NAQA, approved by the Ministry of Education and Science of Ukraine in December 2023, and updated in 2024 and 2025, defines the procedure for the appointment of members of the Appeals Chamber of the NAQA, its powers, and the procedures for governing its work. The Regulation is published on the website of NAQA.

The Appeals Chamber consists of five members, appointed for a two-year term through a competitive selection process. The same person may not serve as a member of the Appeals Chamber for more than two terms. To safeguard independence and avoid conflicts of interest, members of the NAQA Board or Sectoral Expert Councils are not eligible to serve on the Appeals Chamber.

The competitive selection of the members of the Appeals Chamber is carried out by the Competition Commission, formed of five persons. Two members are appointed by the NAQA, one by the Ministry of Education and Science of Ukraine, one delegated from the Joint Representative Body of All-Ukrainian Associations of Employers' Organisations, and one delegated from the National Association of Students of Ukraine, which is a member of the European Students' Union.

The Regulation in point V relates to the procedure for consideration of an appeal against decisions made by the NAQA according to specific regulations.

The grounds to appeal may be:

- violations of decision-making procedures.
- the use of misleading information, which was unknown at the time of the decision-making.
- decisions that breach Ukrainian higher education laws or the evaluation criteria requirements.

An appeal must be submitted within 15 calendar days of the decision's publication, and the Appeals Chamber must consider the appeal within 30 days of receiving it.

The appeals must include personal details, the decision being challenged, reasons and evidence, and the appellant's demands.

A reporter prepares the draft decision within 10 days of receiving the appeal. Appeals may be left undecided if they are late, incomplete, duplicated by a court case, or contain offensive language.

The meeting requires at least three members and may be held via videoconference. Decisions are made by majority vote and can either cancel or uphold the NAQA's decision.

The Appeals Chamber can either overturn the NAQA Board's decision or reject the appeal. If overturned, the case returns to the NAQA Board for reconsideration, requiring a new decision that takes into account the Appeal Chamber's arguments and may differ from prior rulings.

All final decisions are signed by the Head (or Chair) and published on the Agency's website.

	2020	2021	2022	2023	2024	2025
Appeals considered	13	7	5	-	4	4
Appeals rejected	12	6	5	-	4	3
Appeals satisfied	1	1	0	-	0	1

Source: NAQA Secretariat

The panel notes that the majority of appeals are rejected.

Complaints

In the SAR, NAQA outlines that higher education institutions can raise complaints during the external evaluation of their study programmes. For example, if an expert has a conflict of interest, the HEI may notify NAQA, which can remove the expert from the panel. HEIs can also provide detailed feedback on the external evaluation report and the SEC draft opinion, and these comments are considered during the SEC and NAQA Board meetings.

NAQA processes complaints according to the Law of Ukraine on Citizens' Appeals, its internal instructions, and the *Procedure for the Consideration of Complaints and Appeals by Higher Education Institutions regarding the Accreditation of Study Programmes at the NAQA (2025)*. Complaints may be submitted individually or collectively and are reviewed by the Head or Vice Head of NAQA, who assigns them for investigation.

HEIs may file complaints on grounds such as:

- violations of accreditation procedures.
- decisions based on false information unknown at the time.
- non-compliance of evaluation documents with assessment criteria.
- biased, unobjective, or unethical behaviour by experts or SEC members.
- breaches of NAQA's anti-corruption policies.

During accreditation, complaints are submitted as reasoned comments on the evaluation report or the draft SEC opinion. These comments become part of the accreditation file and are reviewed at SEC and NAQA Board meetings, where HEIs may voice objections. Additional written or electronic complaints may be submitted to the Secretariat, and issues concerning anti-corruption policy violations are handled by NAQA's Anti-Corruption Officer.

During the meeting with the Agency staff, it was explained that HEIs may submit formal complaints to the NAQA Secretariat. After requesting the data of complaints from recent years NAQA provided the following data during the site visit:

Received in 2024:

- 9 letters concerning the draft expert opinion.
- 4 letters concerning SEC opinions.

Received in 2025:

- 11 letters concerning the draft SEC opinion.
- 4 letters relating to disagreement with SEC opinions.

In addition, the Commission on the quality assurance of experts has dealt with two complaints regarding the activities of experts since 2023, while the Leading Specialist on Anti-Corruption Activities has not received any complaints to date.

Analysis

Regarding the appeals, NAQA has a formal and clearly defined appeals procedure, established in the Regulations, as the final stage of the programme accreditation process. The Regulation is published on the NAQA website. The appeals procedure is used from time to time by HEIs, and the number of appeals remains low in relation to the high volume of programme accreditations carried out annually; approximately four appeals per year can be considered a limited number.

The independence of the Appeals Chamber is clearly defined, fully separated from the experts' panels and SECs members. The Regulation on the Appeals Chamber of the NAQA clearly establishes the requirements for the members, the procedure to select its members, and the procedure for consideration of an appeal by the Appeals Chamber and finally the procedure to consider decisions of the Appeals Chamber by the NAQA Board.

Under the current process, after the Appeals Chamber reviews a case, the NAQA Board is permitted to adopt a new decision. The panel considers that issuing a new decision (even if it incorporates the Appeals Chamber's arguments) is not ideal, as it could itself be appealed. To strengthen the finality and independence of the appeals process, the panel suggests that the Appeals Chamber's decision be made final, with no further review of the same case by the Board.

With regards to complaints, the panel notes a complaints procedure was referenced in the SAR, but it was difficult for the panel to locate on the Agency's website, as it was not available in English. Following a request during the site visit, the Agency provided the panel with a translated version of the formal procedure for handling external complaints.

HEIs can submit comments or complaints during the accreditation process after receiving the expert panel report or the SEC report. However, the panel notes that these opportunities are procedural safeguards during the evaluation process rather than formal complaints mechanisms. It remains unclear whether the formal complaints procedure also covers issues such as the behaviour of experts, procedural timelines, conduct of the Agency or other issues related to the accreditation process.

In this context, NAQA's Commission on Work Quality Assurance of Experts has a role in considering the poor-quality performance of experts, but it is not entirely clear to the panel which types of complaints fall within this bodies.

In the panel's view, while NAQA provides HEIs with mechanisms to support procedural fairness, a more structured and transparent approach should be established. NAQA should more clearly distinguish between complaints and appeals processes and identify the bodies responsible for

considering each. For example, it was unclear whether situations such as “decision-making by an expert panel or SEC based on documents containing false information, which was not known at the time of making such a decision” or “non-compliance of the external evaluation report or SEC's expert opinion with the Assessment Criteria” should be considered complaints or appeals, as these are referred to inconsistently in the SAR.

Panel recommendations-07

The panel recommends that NAQA establishes a clear and comprehensive complaints procedure, distinct from the appeals process, that explicitly defines the different types of complaints, the bodies or individuals responsible for handling each, and is made publicly available.

Panel suggestions for further improvement-04

The panel suggests that the decision of the Appeals Chamber should be final, avoiding the possibility of a further decision by the NAQA Board.

Panel conclusion: partially compliant

ADDITIONAL OBSERVATIONS

NATIONAL ROLE OF NAQA

The panel observes that, as NAQA's external quality assurance system moves from its initial development and implementation phase into a more mature and long-term operational stage, new challenges are likely to arise. These may include increased staff turnover, growing workloads, and the consolidation of established routines. While the panel is confident in NAQA's capacity to manage this transition successfully, ensuring the sustainability of the system will require a renewed strategic focus and appropriate institutional support.

INTERNATIONAL ROLE OF NAQA

The extensive participation by NAQA in European projects and collaborations with quality assurance agencies has provided diverse perspectives and has contributed to the development of internal and external quality assurance of higher education Ukrainian, even under challenging circumstances. These partnerships have helped ensure that Ukrainian higher education remains aligned with the European Higher Education Area and competitive internationally. The panel encourages NAQA to continue this effort in the coming years.

REGISTRATION OF FOREIGN QA AGENCIES

NAQA has scope to explore a more proactive role with the Ministry in clarifying and coordinating the authorization and registration of foreign quality assurance agencies operating in Ukraine, as well as the recognition of foreign qualifications. Greater definition and public articulation of these processes would improve transparency, provide a clearer overview of the national qualifications landscape, and further strengthen confidence in quality assurance arrangements across the system.

INTRODUCTION OF INSTITUTIONAL ACCREDITATION

The panel notes that NAQA has undertaken substantial preparatory and consultative work towards the future introduction of institutional accreditation, including pilot activities, international cooperation, and broad stakeholder engagement. While this process is currently paused due to the circumstances of martial law, the panel observes that, when conditions allow, the development of a clear and phased roadmap for the implementation of institutional accreditation could support transparency, shared understanding, and readiness across the sector. Such a roadmap might address key elements including internal organisational arrangements, expert preparation, methodological development, dissemination of regulations, and supporting documentation.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1 - Panel commendations-01

The panel commends the Agency in promoting a quality culture and the ESG among the higher educational institutions as well as for its strong engagement with all stakeholders. This achievement is particularly notable given that NAQA is a relatively young Agency that has developed and operates under very challenging circumstances.

ESG 3.4 - Panel commendations-02

The panel commends the Agency for having a dedicated unit for data analysis, which enables the continuous production of thematic analyses, as well as for the diversity of these thematic analyses and the relevance they have gained within the Ukrainian higher education system

ESG 3.5 - Panel commendations- 03

The panel highlights the ICS database and the full digitalisation of the entire accreditation process as a key strength of the Agency.

ESG 2.2 - Panel commendations-04

The panel commends NAQA for its proactive efforts and approach to involve all stakeholders in the development and implementation of its processes.

ESG 2.3 - Panel commendations-05

The panel commends NAQA for its ability to adapt accreditation processes during martial law, ensuring they remained fit for purpose and allowed the continuity of quality assurance, safeguarding the interests of students in exceptional circumstances.

ESG 2.4 - Panel commendations-06

The panel commends the Agency for the comprehensive training provided to experts, particularly the quality of the training materials and the clear requirements for inclusion in the Register of Experts.

ESG 2.4 - Panel commendations-07

The panel commends the Agency for its partnership with the National Students League in developing training programmes that support students' active participation in internal quality assurance (IQA).

ESG 2.6 - Panel commendations- 08

The panel commends the Agency for ensuring transparency and publishing accreditation reports through the ICS database, or on the governance of the report process.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

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

ESG 3.5 - Panel recommendations-01

The panel recommends that NAQA adopts a risk-based approach to management of both human and financial resources to ensure the sustainability of the Agency's processes as they expand in the future

ESG 3.6 - Panel recommendations-02

The panel recommends further strengthening the internal quality assurance system to ensure that it is comprehensive, systematic and effective in supporting continuous improvement across all processes. In particular, this could be achieved through the development and consistent use of indicators covering all key processes, and through a more formalised approach to monitoring, analysing and documenting improvements resulting from the various internal and external feedback mechanisms.

ESG 2.1 Panel recommendations-03

The panel recommends that NAQA strengthen its criteria by explicitly requiring institutions to have an approved, publicly available quality assurance policy.

ESG 2.3 Panel recommendations-04

The panel recommends developing a concise and coherent description of the programme accreditation process, including links to relevant criteria and guidelines and decision-making points. Such an approach would enhance transparency and provide a more comprehensive understanding of how the process operates in practice

ESG 2.3 - Panel recommendations-05

The panel recommends that NAQA implement the follow-up stage at the earliest opportunity to ensure alignment with the standard.

ESG 2.5 - Panel recommendations-06

The panel recommends that NAQA continue to strengthen measures to ensure consistent application of accreditation criteria across all evaluations. This could include enhanced monitoring of expert reports, additional guidance on interpreting criteria, and periodic calibration exercises for expert panels and SECs.

ESG 2.7 - Panel recommendations-07

The panel recommends that NAQA establishes a clear and comprehensive complaints procedure, distinct from the appeals process, that explicitly defines the different types of complaints, the bodies or individuals responsible for handling each, and is made publicly available.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.4 Panel suggestions for further improvement-01

The panel suggests translating as many thematic analyses and reports as possible into English, to broaden their dissemination.

ESG 3.4 Panel suggestions for further improvement-02

The panel suggests establishing a formal plan for the upcoming thematic analyses to be carried out.

ESG 2.6 - Panel suggestions for further improvement-03

The panel suggests that NAQA further enhances the user-friendliness and navigability of access to final accreditation reports for general public users within the ICS system.

ESG 2.7 - Panel suggestions for further improvement-04

The panel suggests that the decision of the Appeals Chamber should be final, avoiding the possibility of a further decision by the NAQA Board.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
[05.12.2025]				
0.1	16.30-18.00	90 min	Review panel's kick-off meeting and preparations for site visit	
[18.11.2025] - Online meeting with the Agency's resource person				
	16.00-17.30 (CET)	90 min	An online clarification meeting with the Agency's resource person regarding the specific national/legal context in which an Agency operates, specific quality assurance system to which it belongs and key characteristics of the Agency's external QA activities	NAQA Vice Head
[10.12.2025] – Day I				
	09.00-10.30	90 min	Review panel's private meeting	
I	10.30-11.15	45 min	Meeting with Head, Vice Heads and members of the Board.	NAQA Head. NAQA Vice Head. NAQA Vice Head NAQA Vice Head. NAQA Board Member. NAQA Board Member. NAQA Board Member.
2	11.15-12.00	45 min	Meeting with Head and Vice Head of NAQA Secretariat	Head of NAQA Secretariat. Vice Head of NAQA Secretariat.
	12.00-12.15	15 min	Review panel's private discussion	

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
3	12.15-13.30	75 min	Meeting Heads and key people of these departments. • Study programme • Expert Support • Support of Sectoral Expert Council	Head of the Study Programme Accreditation Department. Study Programme Accreditation Department. Leading Specialist of the Study Programme Accreditation Department. Head of the Analytics and Training Support Department. Leading Specialist of the Analytics and Training Support Department. Temporary Head of the Expert Support Department (from June 2025); Head of the Support of Sectoral Expert Councils Department
	13.30-14.30	60 min	Lunch (panel only)	
4	14.30-15.15	45 min	Meeting with the Study Programme Accreditation Committee and Military Education Committee	3 Representatives of the Study Programme Accreditation Committee Head of the Committee. Member of the Committee. Member of the Committee. 3 Representatives of the Military Education Committee Head of the Committee. Member of the Committee. Vice Head of the Committee.
	15.15-15.30	15 min	Review panel's private discussion	

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
5	15.30-16.15	45 min	Meeting with NAQA experts (incl. academic experts, and employers, national and international)	Academic expert. Academic expert. Academic expert. Academic expert. Expert from among the employers. International expert. International expert. Expert from among the employers;
6	16.15 -16.45	30 min	Meeting Advisory Board and International Partners	Advisory Board Member (Advisory Board Head 2020-2025). Vice Head of the Advisory Board. Advisory Board Member. International partner (UKÄ representative) and Advisory Board Member. International partner (QAA representative). International partner (HAKA representative)
	16.45-17.30	45 min	Wrap-up meeting among panel members and preparations for day 2	
			Dinner (panel only)	
[11.12.2025] – Day 2				
7	09.00-10.30	90 min	Meeting with Sectoral Expert Councils	Head of the Sectoral Expert Council 07.1 “Management and Administration”. Head of the Sectoral Expert Council 03 “Humanitarian Sciences”. Head of the Sectoral Council 25 “Military sciences, national security, state border security” Member of the Sectoral Expert Council 03 “Humanitarian Sciences” from among the students.

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
				Vice Head of the Sectoral Expert Council 01 “Pedagogy”. Member of the Sectoral Expert Council F “Informational Technologies”. Member of the Sectoral Expert Council 26 “Civil Security” from among the employers. Head of the Sectoral Expert Council 14” Electrical Engineering”. Head of Sectoral Expert Council 28 “Public Administration”
	10.30-10.45	15 min	Review panel’s private discussion	
8	10.45-11.30	45 min	Meeting with NAQA student’s experts + National Student union	Ukrainian Association of Students (UAS) President. Coordinator of the National Association of Students-Experts on the Educational Quality (UAS), SEC Member. NAQA expert from among students. SEC Member, NAQA expert from among students. Head of the Executive Board Ukrainian Students’ League (USL); Head of the Executive Board (2023-2025) (USL); Collegian responsible for Government Relations (2023-2025) (USL).
	11.30-11.45	15 min	Review panel’s private discussion	
9	11.45-12.30	45 min	Meeting with ministry representatives	Head of Parliament Committee on Education. Deputy Minister of Education and Science of Ukraine. State Secretary of the Ministry of Internal Affairs.

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
				Head of the Department of Medical Personnel, Education and Science of the Ministry of Health of Ukraine.
10	12.30-13.00	30 min	Meeting with Appeals Chamber/Committee	Head of the Appeals Chamber. Member of the Appeals Chamber. Member of the Appeals Chamber. Member of the Appeals Chamber. Member of the Appeals Chamber. Head of the Appeals Chamber(2019-2025)
	13.00-14.00	60 min	Lunch (panel only)	
	14.00-14.30	30 min	Review panel's private discussion	
11	14.30- 15.30	60 min	Meeting with Heads of reviewed HEIs/HEI and representatives quality assurance officers of HEIs*. *Including HEIs who have had conditional accreditation, and who have undergone post-accreditation monitoring.	. Rector of the National University of Life and Environmental Sciences of Ukraine. Rector of the Zhytomyr Ivan Franko State University. Rector of the Vasyl Stefanyk Carpathian National University (2012-2025). Vice Rector of Taras Shevchenko National University of Kyiv, responsible for quality assurance. Vice Rector of King Danylo University. Vice Rector of the Lutsk National Technical University. Quality assurance officer at the Kyiv National Economic University named after Vadym Hetman. Quality assurance officer at the National University of Water and Environmental Engineering.
12	15.30-16.15	45 min	Meeting with key body of the Agency from these departments:	Head of the Accounting and Financial Support Department.

SESSION NO.		TIMING	TOPIC	PERSONS FOR INTERVIEW
			- Accounting and Financial - HR - IT - Material and Technical Support - Anti-Corruption Officer	Vice Head of the Accounting and Financial Support Department. Head of the Material and Technical Support Sector. Head of the IT Department. Head of the HR Department. Head of the PR and International Cooperation Department. Leading Specialist, NAQA staff trainer. Leading Specialist on Anti-Corruption Activities.
	16.15-17.15	60 min	Wrap-up meeting among panel members and preparations for day 3	
			Dinner (panel only)	
[11.12.2025] – Day 3				
13	09.00-09.45	45 min	Meeting with key body of the Agency to clarify any pending issues	
	09.45-10.00	15 min	Review panel's private discussion	
14	10.00-10.45	45 min	Meeting with Head and Vice head to clarify any pending issues	
	10.45-12.00	75 min	Private meeting between panel members to agree on the main findings	
	12.00-13.00	60 min	Lunch (panel only)	
15	13.00-13.30	30 min	Final de-briefing meeting with staff and Board members of the Agency to inform about preliminary findings	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the National Agency For Higher Education Quality Assurance (NAQA) by ENQA	Зовнішнє оцінювання Національного агентства із забезпечення якості вищої освіти Європейською асоціацією із забезпечення якості вищої освіти (ENQA)
Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN NAQA, ENQA AND EQAR April 2025	Додаток I: ТРИСТОРОННЄ ТЕХНІЧНЕ ЗАВДАННЯ МІЖ NAQA, ENQA ТА EQAR Квітень 2025 року
I. Background and context The National Agency for Higher Education Quality Assurance (NAQA), Ukraine is a permanent collegial body and commenced its activities since 2019. NAQA's mission is to ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders. The main scope of NAQA activities is study programme accreditation, as well as analyses of the quality of educational activities of higher education institutions, legislative changes, academic integrity issues. NAQA provides study programme accreditation which aims to ensure and improve the quality of higher education, which is carried out according to the criteria defined by the Regulations on Accreditation of Study Programmes in Higher Education. NAQA has been an affiliate of the European Association for Quality Assurance in Higher Education (ENQA) since 2020 and is applying for ENQA membership. NAQA has not been registered on the European Quality Assurance Register for Higher Education (EQAR) so far, and is now applying for inclusion on EQAR.	I. Передумови та контекст Національне агентство із забезпечення якості вищої освіти (Національне агентство), (Україна) є постійно діючим колегіальним органом і розпочало свою діяльність з 2019 року. Місія Національного агентства - забезпечувати сталість і послідовність розвитку культури якості вищої освіти та її захист через ефективне партнерство стейкхолдерів. Основною сферою діяльності Національного агентства є акредитація освітніх програм, а також аналіз якості освітньої діяльності закладів вищої освіти, зміни в законодавстві та питання академічної доброчесності. Національне агентство забезпечує акредитацію освітніх програм, метою якої є забезпечення та вдосконалення якості вищої освіти, що здійснюється за визначеними критеріями Положення про акредитацію освітніх програм, за якими здійснюється підготовка здобувачів вищої освіти. З 2020 року Національне агентство є афілійованим членом Європейської асоціації із забезпечення якості вищої освіти (ENQA) і подає заявку на членство в ENQA. Національне агентство досі не зареєстроване в Європейському реєстрі забезпечення якості вищої освіти (EQAR), і зараз подає заявку на включення до EQAR.

2. Purpose and scope of the review This review will evaluate the extent to which NAQA (the agency) complies with each of the standards of Parts 2 and 3 of the <i>Standards and Guidelines for Quality Assurance in the European Higher Education Area</i> (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. Мета та обсяг оцінювання Це оцінювання вимірює ступінь дотримання Національним агентством (агентством) кожного зі Стандартів частин 2 і 3 Стандартів і рекомендацій щодо забезпечення якості в Європейському просторі вищої освіти (ESG) і підтримує агентство в його зусиллях щодо постійного аналізу та вдосконалення своєї роботи. Таке зовнішнє оцінювання є обов'язковою вимогою для агентств, які бажають подати заявку на членство в ENQA та/або на реєстрацію в EQAR.
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: - Study Programme accreditation conducted by NAQA.	2.1 Діяльність агентства в рамках ESG Щоб подати заявку на членство в ENQA та реєстрацію в EQAR, це оцінювання аналізує всю діяльність агентства, яка підпадає під сферу ESG, наприклад, огляди, аудити, оцінювання або акредитації ЗВО або освітніх програм, які стосуються викладання та навчання (та їх відповідні зв'язки з дослідженнями та інноваціями). Усі види діяльності розглядаються незалежно від географічного охоплення (в межах або за межами ЄПВО), а також від того, чи є вони обов'язковими або добровільними за своїм характером. Під час зовнішньої оцінки мають бути розглянуті наступні напрямки діяльності агентства: - Акредитація освітніх програм Національним агентством із забезпечення якості вищої освіти.
3. The review process The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the <i>Guidelines for ENQA Agency Reviews</i> and the requirements of the <i>EQAR Procedures for Applications</i>. The review procedure consists of the following steps:	3. Процес оцінювання Оцінювання буде проводитися відповідно до методології Оцінювання агентств ENQA. Процес розроблений відповідно до Рекомендацій з оцінювання агентств ENQA та вимог Процедур EQAR щодо подання заявок. Процедура оцінювання складається з наступних етапів:

- Formulation of, and agreement on the Terms of Reference for the review between NAQA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website¹); - 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 to Budapest, Hungary; - 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 to Budapest, Hungary	- Формулювання та узгодження Технічного завдання на оцінювання між Національним агентством, ENQA та EQAR (включно з публікацією Технічного завдання на веб-сайті ENQA); - Номінування та призначення експертної групи ENQA; - Повідомлення EQAR про призначену експертної групи; - Самооцінювання агентства, включаючи підготовку та публікацію звіту самооцінювання; - Візит експертної групи до агентства в Будапешті, Угорщина; - Підготовка та заповнення фінального звіту про зовнішнє оцінювання експертною групою; - Вивчення фінального звіту про зовнішнє оцінювання Комітетом з перевірки агентств ENQA; - Публікація фінального звіту про зовнішнє оцінювання; - Рішення Комітету з реєстрації EQAR про реєстрацію агентства в EQAR; - Рішення Правління ENQA про членство в ENQA; - Виконання рекомендацій експертної групи для агентства, включаючи добровільний проміжний візит до Будапешта, Угорщина.
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	3.1 Висунення кандидатур та призначення експертної групи Експертна група складається з чотирьох експертів: одного або двох експертів із

¹ The agency is encouraged to publish the ToR on its website as well.

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. 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 vitae 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.	забезпечення якості (принаймні один з яких наразі працює в агентстві-члені ENQA), викладача, який працює ЗВО, представника студентства та потенційного представника роботодавців (за бажанням). Один з членів виконує функції голови експертної групи, а інший - секретаря експертної групи. Для оцінювання Агентства ENQA принаймні один з експертів є номінантом ENQA (найчастіше це фахівець(и) із забезпечення якості). Щонайменше одного з експертів призначають з-поміж номінантів Європейської асоціації університетів (EUA) або Європейської асоціації закладів вищої освіти (EURASHE), а студентського експерта завжди обирають з-поміж експертів, номінованих ESU. За бажанням, представник роботодавців може бути обраний з числа номінантів від Business Europe або ENQA. На вимогу агентства до складу експертної групи може бути включений додатковий експерт. У цьому випадку стягується додаткова плата для покриття гонорару експерта та витрат на відрядження. Експертній групі надаватиме підтримку оцінювання ENQA (співробітник ENQA), який стежитиме за доброчесністю процесу та забезпечуватиме дотримання вимог ENQA протягом усього процесу. Координатор оцінювання не буде секретарем та не братиме участі в обговореннях під час інтерв'ю, під час візитів експертної групи. Чинні члени Правління ENQA не можуть бути експертами. ENQA надасть агентству запропонований склад експертної групи та біографічні дані експертів, щоб переконатися у відсутності будь-яких відомих конфліктів інтересів. Експерти повинні будуть погодитися із заявою про відсутність конфлікту інтересів, яка буде включена до їхнього контракту на
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	проведення експертизи з цим агентством.
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	3.2 Самооцінка агентства, включаючи підготовку звіту самооцінювання Агентство несе відповідальність за проведення та організацію власного процесу самооцінювання і повинна дотримуватися наступних рекомендацій: - Самооцінювання організоване як проект з чітко визначеним графіком і включає всі відповідні внутрішні та зовнішні зацікавлені сторони; - Очікується, що звіт самооцінювання буде містити: - короткий опис системи забезпечення якості вищої освіти; - історію, профіль та діяльність агентства; - презентація того, як агентство відповідає кожному окремому стандарту Частин 2 і 3 ESG для кожного виду зовнішньої діяльності агентства із забезпечення якості, з коротким критичним осмисленням представлених фактів; - думки стейкхолдерів; - випадки часткової відповідності, зазначені в останньому рішенні Комітету з реєстрації EQAR про включення/поновлення, а також будь-які інші аспекти, які могли бути підняті Комітетом з реєстрації EQAR у наступних рішеннях щодо звіту про зміни (якщо це доречно); - посилання на рекомендації, надані в попередньому оцінюванні, та заходи, вжиті на виконання цих рекомендацій; - SWOT-аналіз; - роздуми про ключові виклики та

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 <i>Guidelines for ENQA Agency Reviews</i>, 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.	напрямки майбутнього розвитку агентства. - У звіті самооцінювання описується вся зовнішня діяльність агентства із забезпечення якості (як визначено в Стандарті 2.1) та аналізується її відповідність ESG. - Звіт добре структурований, стислий і всебічний. Він чітко демонструє, якою мірою агентство виконує свої завдання із зовнішнього забезпечення якості та відповідає ESG. Звіт самооцінювання подається до Секретаріату ENQA, який має два тижні для проведення перевірки. Мета перевірки полягає в тому, щоб переконатися, що звіт самооцінювання є задовільним для розгляду експертною групою. Секретаріат не оцінюватиме зміст інформації, а лише те, чи присутня необхідна інформація, як зазначена в Рекомендаціях з оцінювання агентств ENQA. Якщо звіт самооцінювання не містить необхідної інформації та не відповідає встановленій формі та змісту, Секретаріат ENQA залишає за собою право попросити надати доопрацьовану версію звіту протягом двох тижнів. Остаточна версія звіту самооцінювання агентства подається на розгляд експертної групи щонайменше за вісім тижнів до візиту експертної групи. Агентство публікує заповнений звіт самооцінювання на своєму веб-сайті та надсилає посилання на нього до ENQA. ENQA також публікує це посилання на своєму веб-сайті.
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	3.3 Візит експертної групи Експертна група підготує проект графіка візиту, який має бути поданий до агентства щонайменше за шість тижнів до запланованих дат візиту. Графік

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.	повинен включати орієнтовний розклад зустрічей та інших заходів, які мають бути проведені експертною групою під час візиту, тривалість якого, як правило, становить 2,5 дні. Затверджений графік має бути наданий агентству щонайменше за місяць до візиту для належної організації запитуваних інтерв'ю. Напередодні візиту (бажано - щонайменше за два тижні до візиту) експертна група організовує обов'язкову онлайн-зустріч з агентством. Ця зустріч проводиться для того, щоб переконатися, що група досягла достатнього розуміння: - Особливий національний/правовий контекст, в якому працює агентство; - Конкретна система забезпечення якості, до якої належить агентство; - Ключові характеристики зовнішньої діяльності агентства із забезпечення якості. Під час візиту експертній групі допомагатиме Координатор оцінювання ENQA. Координатор оцінювання виступатиме головним зв'язковим з агентством, контролюватиме цілісність процесу оцінювання та його послідовність, а також гарантуватиме, що загальні очікування ENQA від оцінювання будуть враховані та виконані. Візит завершиться фінальною підсумковою зустріччю, на якій експертна група окреслить свої загальні враження та надасть огляд рішення щодо відповідності агентства ESG. Експерти не коментують, чи буде агентство надано/підтверджено членство в ENQA або реєстрацію в EQAR, чи ні.
3.4 Preparation and completion of the final review report	3.4 Підготовка та завершення остаточного звіту про зовнішнє

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 <i>Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies</i>² 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.	оцінювання На основі висновків експертної групи секретар експертної групи готує проект звіту за погодженням з експертною групою. Звіт має відповідати меті та обсягу оцінки, визначеним у розділах 2 та 2.1. Він також має містити чітке обґрунтування висновків експертної групи щодо кожного стандарту Части 2 та 3 ESG. При підготовці звіту експертна група повинна також враховувати Політику EQAR щодо використання та інтерпретації ESG для Європейського реєстру агентств із забезпечення якості щоб переконатися, що звіт містить достатню інформацію для розгляду заявки агентства на реєстрацію в EQAR Комітетом з реєстрації. Проект звіту спочатку подається Координатору оцінювання ENQA, який перевіряє звіт на послідовність, ясність і мову, а потім подається до агентства - зазвичай протягом 10 тижнів після візиту - для коментарів лише щодо фактичної точності та серйозних непорозумінь. На це агентству дається два тижні, і на цьому етапі воно не повинно подавати жодних додаткових матеріалів чи документації. Після цього експертна група візьме до уваги зауваження агентства щодо можливих фактичних помилок, доопрацює та надішле звіт про зовнішнє оцінювання до ENQA. Звіт має бути завершений протягом трьох місяців після візиту і, як правило, не перевищувати 40-50 сторінок.
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	3.5. Публікація звіту та подальший процес Агентство отримає звіт експертної групи та опублікує його на своєму веб-сайті після того, як Комітет з перевірки Агентств затвердить звіт. Звіт також буде опублікований на веб-сайті ENQA разом із заявою Комітету з перевірки агентств, який затверджує звіти про зовнішнє

² Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website. The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.	оцінювання шляхом оцінки цілісності процесу оцінки та перевірки якості та узгодженості звітів. Важливо, що під час цього процесу і до остаточної валідації звіту, Комітет з перевірки агентств має можливість запросити додаткові (документальні) докази або роз'яснення від експертної групи, координатора або агентства, якщо це необхідно. Звіт про перевірку буде опублікований на сайті ENQA незалежно від результатів перевірки. У рамках подальшої діяльності за результатами оцінювання агентство зобов'язується відреагувати на рекомендації оцінювання та подати звіт про подальші дії до ENQA протягом двох років з моменту затвердження остаточного звіту про зовнішнє оцінювання. Звіт про подальші заходи буде опублікований на веб-сайті ENQA. Звіт про подальші заходи може бути доповнений проміжним візитом до агентства, який здійснюють два члени первинної експертної групи (за можливості). Цей візит, який зазвичай відбувається через 2-3 роки після перевірки остаточного звіту зовнішнього оцінювання (і після подання подальшого звіту), має на меті запропонувати орієнтований на вдосконалення та стратегічний діалог, який зазвичай може бути важко інтегрувати в рамках візиту, орієнтованого на дотримання вимог. Таким чином, проміжний візит не має на меті перевірити дотримання агентством ESG або те, як агентство виконує рекомендації, а скоріше надає майданчик для стратегічної комунікації, які дозволяють агентству поміркувати над своїми ключовими викликами, можливостями та пріоритетами. Якщо агентство не бажає скористатися цією можливістю, воно може відмовитися від участі, повідомивши про це Координатора оцінювання ENQA.
4. Use of the report	4. Використання звіту

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership. For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board. To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of	ENQA зберігає право власності на звіт. Інтелектуальна власність на всі роботи, створені експертною групою у зв'язку з контрактом на проведення оцінювання, включаючи, зокрема, будь-які письмові звіти, буде належати ENQA. Звіт використовується як основа для прийняття рішення Реєстровим комітетом про реєстрацію агентства в EQAR. У разі неуспішної заявки на реєстрацію в EQAR, звіт також може бути використаний Правлінням ENQA для прийняття рішення про те, чи може агентство бути прийняте/підтверджене в якості члена ENQA. Таким чином, процес оцінювання покликаний слугувати двом цілям. У будь-якому випадку, звіт про оцінювання слід вважати остаточним лише після його затвердження Комітетом з оцінки агентств. Після подання до ENQA, але до затвердження Комітетом з оцінювання, звіт не може використовуватися або на нього не може покладатися агентство, експертна група або будь-яка третя сторона, а також не може бути розголошений без попередньої письмової згоди ENQA. Затвердження звіту не залежить від рішення про реєстрацію EQAR або членство в ENQA. Для реєстрації в EQAR агентство надсилає звіт про зовнішнє оцінювання (після затвердження Комітетом з оцінювання агентств) до EQAR електронною поштою. Агентство також має додати звіт самооцінювання (у форматі PDF), Декларацію про доброчесність та будь-які інші документи, які можуть мати відношення до заявки (наприклад, додатки, заяву до звіту про зовнішнє оцінювання, оновлення). Очікується, що EQAR розгляне звіт про зовнішнє оцінювання та заяву агентства на засіданні свого Реєстрового комітету, як зазначено в орієнтовному графіку розгляду,
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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.	наведеному нижче, і до прийняття рішення про членство в ENQA Правлінням ENQA. Щоб подати заявку на членство в ENQA, агентство також має надати лист на ім'я Правління ENQA з викладенням своєї мотивації для подачі заявки на членство та способів, якими агентство планує зробити внесок у роботу та цілі ENQA під час свого членства. Цей лист буде розглянутий Правлінням разом з підтвердженням включення до списку EQAR при прийнятті рішення про членство агентства. Якщо агентству не буде надано реєстрацію в EQAR або реєстрацію не буде поновлено, рішення про членство в ENQA буде прийнято на основі остаточного звіту про оцінювання, листа-заявки та заяви від Комітету з перевірки агентств. Рішення про членство буде опубліковано на веб-сайті ENQA.
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5. Indicative schedule of the review

Agreement on Terms of Reference	May 2025	Погодження Технічного завдання	Травень 2025
Appointment of review panel members	July 2025	Призначення експертної групи	Липень 2025
Self-assessment completed	17 August 2025	Самооцінювання завершено	17 серпня 2025
Screening of SAR by ENQA Review Coordinator	End August 2025	Перевірка звіту самооцінювання координатором оцінювання ENQA	Кінець серпня 2025
Preparation of the site visit schedule and indicative timetable	September 2025	Підготовка розкладу візиту експертної групи та орієнтовного графіку	Вересень 2025
Briefing of review panel members	October 2025	Брифінг експертної групи	Жовтень 2025
Review panel site visit	First week of December 2025 or January 2026	Візит експертної групи	Перший тиждень грудня 2025 або січень 2026
Draft of review report and its submission to ENQA	February 2026	Проект звіту про зовнішнє оцінювання та його подання	Лютий 2025

Review Coordinator for verification of its compliance with the Guidelines	
Draft of review report to be sent for a factual check to the agency	March 2026
Agency statement on the draft report to the review panel (if necessary)	March 2026
Submission of the final report to ENQA	April 2026
Validation of the review report by the Agency Review Committee	May 2026
Publication of report	May 2026
EQAR Register Committee meeting and initial consideration	Summer 2026
Decision on ENQA membership by the ENQA Board	Spring or summer 2026

координатору оцінювання ENQA для перевірки його відповідності Рекомендаціям	
Проект звіту буде надіслано на перевірку фактажу агентству	Березень 2026
Заява агентства щодо проекту звіту експертної групи (якщо необхідно)	Березень 2026
Подача фінального звіту в ENQA	Квітень 2026
Валідація звіту Комітетом з оцінювання	Травень 2026
Розміщення звіту	Травень 2026
Засідання Комітету з реєстрації EQAR та первинний розгляд	літо 2026
Рішення Правління ENQA щодо членства в ENQA	Весна або літо 2026

ANNEX 3: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
ESTDEV	Estonian Centre for International Development
HAKA	Estonian Quality Agency for Education
HE	higher education
HEI	higher education institution
ICS	Information and Communication System
ISCED	International Standard Classification of Education
QA	quality assurance
SAR	self-assessment report
SEC	Sectoral Expert Council
SEQA-ESG 2	Supporting European QA Agencies in Meeting the ESG 2
UAS	Ukrainian Association of Students
USEDE	Unified State Electronic Database on Education

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NAQA

Annex A. NAQA's Organisational Structure,

Annex B. Activities of the Structural Units of NAQA,

Annex C. NAQA Milestones,

Annex D. NAQA IQA System Structure,

Annex E. Adaptations of Accreditation Procedures under Extraordinary Circumstances,

Annex F. Enhancement of Expert Methodology and Reporting, Improvement of Accreditation,

Annex G. Documentary Evidence of Regularity of External Quality Assurance Activities,

Annex H. International Recognition and Cooperation, Annex J. Review and Improvement Cycle of Internal Quality Assurance System, Annex K. Evaluation of Expert Work Quality,

Annex L. Erasmus+ Projects, Annex M. Number of Experts According to the Field of Study as of December 2024,

Annex N. Mapping of the NAQA Study Programme Accreditation Criteria with ESG 2015, part I,

Annex O. Sectoral Expert Council Composition,

Annex P. NAQA Experts Selection,

Annex Q. NAQA Training Programmes for Expert Candidates,

Annex R. Standard 3.4 Thematic analysis, Annex S. Standard 3.6 Internal QA and professional conduct

Examples of expert opinion of the Sectoral Expert Council on the possibility of accreditation of the study programme translated to English.

Examples of site visit reports translated to English

Training materials for experts and SEC's members

OTHER SOURCES USED BY THE REVIEW PANEL

www.naqa.org

ENQA AGENCY REVIEW 2026

THIS REPORT presents findings of the ENQA Agency
Review of the National Agency for Higher Education
Quality Assurance (NAQA), undertaken in 2025.