

ENQA AGENCY REVIEW

TURKISH HIGHER EDUCATION QUALITY COUNCIL (THEQC)

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EXECUTIVE SUMMARY

This report summarises the analysis and conclusions of the European Association for Quality Assurance in Higher Education (ENQA) review of the Turkish Higher Education Quality Council (Yükseköğretim Kalite Kurulu, THEQC) against the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* following the methodology described in the Guidelines for ENQA Agency Reviews.

The purpose of the review was the renewal of THEQC's membership in ENQA and the European Quality Assurance Register for Higher Education (EQAR) registration.

The review took place from May 2024 to January 2025 with the site visit on 15th-17th October 2024.

First established in 2015 as the Turkish Higher Education Quality Board under the applicable regulation and restructured and renamed as the Turkish Higher Education Quality Council (THEQC) by the Law on Higher Education No. 2547 in 2017, THEQC is a public legal entity, located in the capital of Türkiye Ankara, solely operating in the field of quality assurance (QA) in higher education (HE).

The agency is responsible for 3 main activities:

- to conduct external evaluation of HEIs;
- to execute the authorization process of national and recognition processes of international accreditation agencies;
- to ensure internationalisation and dissemination of quality assurance culture in higher education institutions.

The agency's mission is *"to strengthen quality assurance systems in higher education in order to contribute to the continuous development of higher education institutions in Türkiye and the achievement of universal qualifications by individuals"*.

The agency's vision is *"to be an effective and internationally recognized institution in the field of higher education quality assurance"*.

This review evaluates the extent to which THEQC complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* and supports the agency in its efforts to continually review and enhance its work.

The following external quality assurance activities were agreed to fall within the scope of the review:

- Institutional External Evaluation Program (IEEP);
- Institutional Accreditation Program (IAP);
- a newly introduced International Institutional Accreditation Program (IIAP).

The summary of THEQC's compliance with the ESG Part 2 and Part 3, based on this review, is demonstrated in the table below:

ESG		Judgement
3.1	Activities, policy, and processes for quality assurance	Compliant
3.2	Official status	Compliant
3.3	Independence	Partially compliant
3.4	Thematic analysis	Compliant
3.5	Resources	Compliant
3.6	Internal quality assurance and professional conduct	Partially compliant
3.7	Cyclical external review of agencies	Compliant
2.1	Consideration of internal quality assurance	Compliant
2.2	Designing methodologies fit for purpose	Compliant
2.3	Implementing processes	Compliant

2.4	Peer-review experts	Compliant
2.5	Criteria for outcomes	Compliant
2.6	Reporting	Compliant
2.7	Complaints and appeals	Compliant

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

This review informs THEQC's applications for membership of ENQA and registration with EQAR and also supports its continued enhancement. The review panel has identified 6 commendations, 10 recommendations, and 10 suggestions for further improvement. These can be found throughout the report and are summarised in the conclusion.

INTRODUCTION

This report analyses the compliance of the Turkish Higher Education Quality Council (Yükseköğretim Kalite Kurulu, THEQC) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on the external review conducted in May 2024 – January 2025.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

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

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

THEQC has been a member of ENQA since 2020 and has been registered on EQAR since 2023.

As this is THEQC's second full review¹, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

In March 2024, THEQC submitted a substantive change report to EQAR, introducing a new activity within the scope of the ESG, the International Institutional Accreditation Program (IIAP).

In May 2024 the tripartite Terms of Reference (ToR) for the review were agreed between ENQA, EQAR and the agency.

SCOPE OF THE REVIEW

This review evaluates the extent to which THEQC complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and supports the agency in its efforts to continually review and enhance its work.

The following external quality assurance activities were agreed to fall within the scope of the review:

- Institutional External Evaluation Program (IEEP);
- Institutional Accreditation Program (IAP);
- a newly introduced International Institutional Accreditation Program (IIAP). Although the methodology of the IIAP at the time of the site visit was approved and published, this program had not as yet been implemented.

The agency also carries out authorization and recognition of independent accreditation agencies, but, according to the ToR, this procedure does not lead to THEQC adopting or endorsing single accreditation reports and decisions by these agencies; therefore, this activity is not within the scope of the ESG.

¹ After THEQC was denied admission to EQAR in 2021 following the first full review, a partial review was carried out by ENQA in 2022.

MAIN FINDINGS OF THE 2019, 2022 REVIEWS

In 2019 the review panel concluded that the agency:

- fully complies with ESG 3.2, 3.4 and 3.7;
- substantially complies with ESG 2.1, 2.2, 2.3, 2.4, 2.5, 3.1, 3.6;
- partially complies with ESG 2.6, 2.7, 3.3 and 3.5.

The agency was commended under the standards: 3.1, 3.4, 3.6, 2.2, 2.3, 2.4 and 2.6.

The panel has come up with a list of recommendations under standards 3.5, 2.1, 2.2, 2.3, 2.4 and 2.5.

Also, one recommendation was formulated by the Board of ENQA under ESG 3.4.

These recommendations are cited in this report under each corresponding ESG standard.

The initial report (2019) contains recommendations from the panel relating to ESG standards 3.1, 3.3, 3.6, 2.6 and 2.7, however these recommendations are not addressed in this review, as the agency's compliance with these ESG standards was already examined by the panel during THEQC's partial review in 2022 post EQAR registration rejection in 2021.

In 2021, following the first full review, the EQAR Register Committee found the agency to be only partially compliant with the following standards:

- ESG 2.6 – Reporting (in particular, the consistency of reports and verification of the publication of Institutional Evaluation Programme (IAP) reports);
- ESG 2.7 – Complaints and appeals (in particular, the implementation of a new process for handling appeals);
- ESG 3.1 – Activities, policy and processes for quality assurance (in particular, stakeholder involvement in the agency's work);
- ESG 3.3 – Independence (in particular, the fact that many of the agency's staff remain as university employees, and continue to be paid by their university);
- ESG 3.6 – Internal quality assurance and professional conduct (in particular, the implementation of the new IQA process and its capacity to drive improvement).

In its holistic judgement, the EQAR Register Committee concluded that THEQC did not comply substantially with the ESG as a whole.

Subsequently, in 2022, THEQC officially approached ENQA to coordinate a partial review and prepare a review report that will be considered for the purpose of EQAR registration. The partial review evaluated to what extent the Institutional External Evaluation Program (IEEP) and Institutional Accreditation Programme (IAP) complied with the aforementioned ESG standards where EQAR Register Committee had concluded there was only partial compliance.

In addition, the review also addressed the standards of ESG Part 2 (ESG 2.1-ESG 2.7) for the activity Institutional Accreditation Programme (IAP) examining the extent the procedure differs from THEQC's Institutional External Evaluation (IEEP) activity.

The panel concluded that THEQC complies with ESGs 2.6, 2.7, 3.1, 3.3 and 3.6 as well as with standards 2.1-2.7 of the ESG in relation to its IAP process. No recommendations were issued. The panel formulated commendations in relation to ESG standards 3.1, 3.3 and 2.6.

These partial review results led to 2023 EQAR's decision to admit the agency to the register.

The level of the agency's ESG compliance is provided in the following table²:

Conclusion:

34. Based on the external review report and the considerations above, the Register Committee concluded that THEQC demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Previous decision (2021-03-18)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Substantial compliance	Compliance
2.2	Compliance	Substantial compliance	Compliance
2.3	Compliance	Substantial compliance	Compliance
2.4	Compliance	Substantial compliance	Compliance
2.5	Compliance	Substantial compliance	Partial compliance
2.6	Partial compliance	Compliance	Compliance
2.7	Partial compliance	Compliance	Compliance
3.1	Partial compliance	Compliance	Compliance
3.2	Compliance	Full compliance	Compliance
3.3	Partial compliance	Compliance	Partial compliance
3.4	Compliance	Full compliance	Compliance
3.5	Compliance	Partial compliance	Compliance
3.6	Partial compliance	Compliance	Compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

REVIEW PROCESS

The 2024 external review of THEQC was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference.

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

- Melita Kovacevic (Chair), Full professor, Director of Doctoral Programme (retired), University of Zagreb, Croatia (academic, EUA nominee);
- Ieva Vaiciukevičienė (Secretary), Independent Expert, former Head of Legal and General Affairs Division at The Centre for Quality Assurance in Higher Education (SKVC), Lithuania (quality assurance professional, ENQA nominee);
- Susan Hackett, (Panel member) Independent Consultant & Trainer, former Manager, Academic Integrity and Strategic Projects at QQI, Ireland (quality assurance professional, ENQA nominee);

² https://backend.deqar.eu/reports/EQAR/AI20_THEQC_ApprovalDecision_v1.pdf

- Topias Tolonen-Weckström, (Panel member (Student)) PhD student in Mathematics at Uppsala University, Sweden (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

Milja Homan, Project and Reviews Officer, supported the team as the review coordinator. Her contribution was significant in assuring the overall quality of the review.

The review was conducted from May 2024 to January 2025. The self-assessment report (SAR) was received at ENQA in June 2024 and after screening by the ENQA coordinator, it was sent to the panel in July 2024. The first briefing meeting was organized on 13th September. During this meeting, the review panel was provided with input from the review coordinator and representative from EQAR, Aleksandra Zhivkovikj, Policy and Project Officer. Another meeting on 1st October was dedicated to the preparation for the site visit and clarification with the agency's resource person. The site visit was organized from 15th to 17th October 2024 at the THEQC premises. The draft report was completed on 9th January 2025 and sent to the THEQC for a factual error check on 14th January 2025. THEQC's feedback on factual errors was received on 24th January 2025. The final review report was submitted to the ENQA's Agency Review's Committee on 30th January 2025.

Upon receiving the agency's feedback on factual accuracy of the report, the panel learned that since 1st January 2025 the agency's website was moved to a different platform and the links that were indicated in the draft of the report are no longer working. Although after receiving this information the report was updated with new relevant links on the new version of THEQC's website, the panels notes that the judgements were based on the evidence that was laid out in the old version of the agency's website.

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

Self-assessment report

According to the SAR, there has been ongoing preparation and monitoring at THEQC since the last ENQA review. To prepare a SAR for this review, the Council of THEQC delegated this task to a SAR preparation working group. This working group included staff members, responsible for internal QA management processes (such as analysis of strategic and performance results, stakeholder surveys and feedback, international relations). Their involvement in preparation of this SAR was a seamless extension of their regular duties, as they had already engaged in the preparation work of the THEQC 2024-2028 Strategic Plan.

The work on the SAR started in January 2024 and concluded in July 2024. After establishing a schedule for the review, the SAR writing group members and the coordinator had regular meetings, during which they developed the SAR with the contributions from other staff members as well.

According to the SAR, the feedback from the stakeholders was incorporated by using the results of previous surveys and stakeholder input that was absorbed during strategic planning. During the self-assessment process, THEQC also examined formal and informal feedback from evaluated institutions and other stakeholders such as external experts³, advisors, Students Commission members, Council members, THEQC staff, and reviewed data from evaluations.

³ THEQC refers to the external experts as to the "evaluators".

Once a draft of the SAR was prepared, it was shared with, firstly, other staff members, and then, with advisors and external experts. Their feedback was collected, aggregated and after the final draft of the SAR was prepared, it was scheduled for the Council review and approval (June 2024).

Following this, the SAR was submitted to ENQA for screening. After the feedback from the ENQA coordinator was received, the final version of the SAR was prepared and published on the agency's website (July 2024).

The panel received the SAR in July 2024. In the panel's view, the SAR's quality was sufficient for review purposes: it was informative and clear, with the references to the legislation and methodologies and other documentation, however, the panel asked the agency to provide several additional documents and clarifications (annual working plans, detailed organisational structure, the examples of processes and subprocesses).

Site visit

The site visit was held on 15th-17th October 2024 at THEQC's premises. The organisation of the site visit was agreed in advance with the review panel, the agency and ENQA. Most of the meetings were organized face-to-face, with the exception of one participant (international advisor), who was interviewed online. The technical arrangements facilitated the efficiency of the site visit. Consecutive translation services were provided throughout the three days of the site visit by two highly qualified and professional translators. Although most of the sessions needed translation, some of the participants were happy to participate in English. The list of the participants for the site visit was provided by the agency and had been amended at the request of the panel, prior to the site visit.

The interviews were carried out with various groups: the President, the Secretary General, the Council members of the agency, the SAR team, staff members (those involved in activities under ESG, also HR, IT, process management, international relations), members of internal commissions, members of the expert pool, senior management and quality assurance officers from HEIs, representatives of different governing bodies and key stakeholders (The Council of Higher Education, the Presidential Educational Policies Council, the Ministry of National Education, the Vocational Qualification Authority of Türkiye) Turkish students, local and international advisors and etc. Unfortunately, no representatives from the labour market, business or broader civic society were present during the site visit. The full schedule with the participants is enclosed as annex No. I.

The panel also had a tour around the agency's premises and were presented with the digital system "Quality Assurance Management Information System (QAMIS)" which was established to facilitate the external evaluation and accreditation procedures.

The site visit went according to the schedule. All of the participants were present and actively expressed their opinions and shared their views. The review panel was able to clarify any outstanding issues with the staff at a separate session, organized for this purpose at the end of the 3rd day. The design and implementation of the schedule enabled the collection of sufficient data and evidence for the review.

The THEQC premises were appropriate for the site visit and were well-equipped for the interviews. The staff was very helpful and respectful. The review panel appreciated the quality and the atmosphere of the interviews as all the participants were open and highly engaged in the discussions.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

There are three main laws that set the legal framework of the Turkish higher education (HE) system:

- Law No. 2547 on Higher Education;
- Law No. 2809 on the Organization of Higher Education Institutions;
- Law No. 2914 on Higher Education Personnel.

In Türkiye, there are 3 types of HEIs: state universities, foundation universities and foundational vocational schools of higher education.

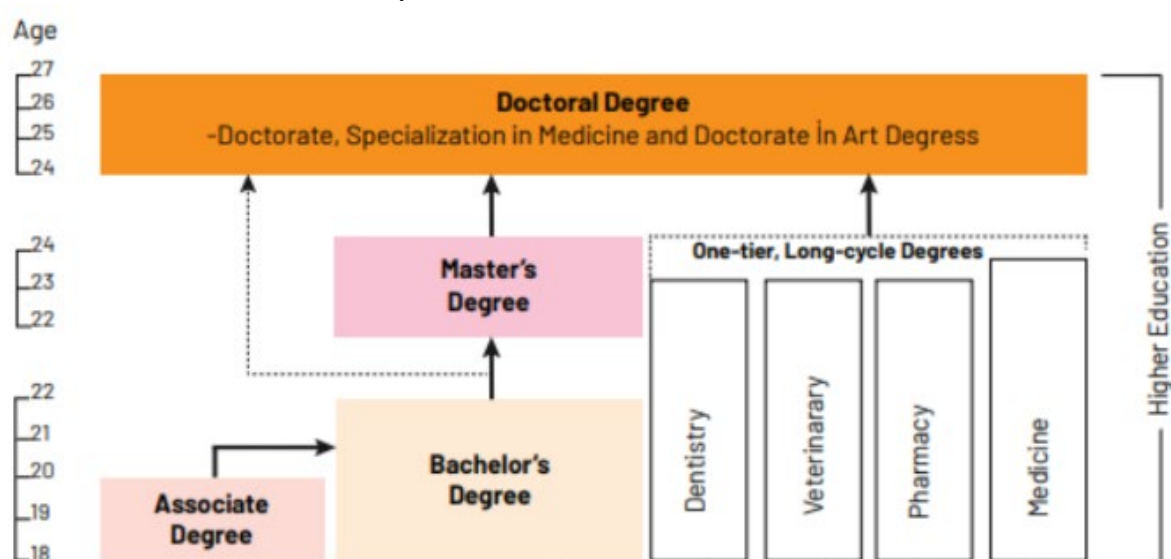
During the clarification sessions with the agency's resource person and other participants, the panel was informed that, in the Turkish HE system, none of the HEIs are 100 percent private, with even the foundation institutions being partially funded by the state.

State and foundation HEIs comprise universities and technology institutes; faculties, institutes, schools, conservatories, research and applied studies centres within universities and technology institutes; vocational schools of higher education affiliated with universities or technology institutes; and foundational vocational schools of higher education, independent of universities or technology institutions, established by foundations on a non-profit-making basis.

Turkish universities offer:

- Associate degree programs, which take 2 years to complete. Vocational high school graduates can qualify for associate's degree programs without taking any centralized exams;
- Bachelor's degree programs, which generally take 4 years to complete. Specialized bachelor's degree programs, e.g., medicine may be longer (6 years);
- Graduate degree programs: Universities in Türkiye offer a wide range of graduate degree programs. While master's programs take about 2 years (non-thesis master's programs generally take 1 1/2 years), doctoral programs take about 4 years;
- Post-graduate programs. Post-graduate opportunities are also available in universities in Türkiye. Duration depends on the program and university.

The structure of the Turkish HE system is demonstrated in this table⁴:



⁴ SAR, p.10

According to the SAR, the Turkish higher education system comprises 208 HEIs for the 2023-2024 academic year, including:

- 129 state universities;
- 75 foundation universities;
- 4 foundational vocational schools of higher education⁵.

These institutions employ a total of 185,225 academic staff (98,976 male and 86,249 female).

The HEIs offer 7,928 associate degree programs, 9,665 bachelor's programs, 16,661 master's programs, and 11,749 doctoral programs.

There was a significant growth in numbers of HEIs in early 2000, both within the state and foundation institutions.

Also, 18 state HEIs and 9 foundation HEIs have been established since 2016⁶:



For the 2023-2024 academic year, a total of 6,950,142 students were enrolled in HEIs, with a gender distribution of 49% male and 51% female.

Of these students, 2,647,054 are in associate degree programs, 3,754,095 are in bachelor programs, 434,485 are in master programs, and 114,508 are in doctoral programs.

Student placements in associate and bachelor degree programs are conducted by the Centre for Assessment, Selection and Placement (ÖSYM) based on the results of standardized national examinations and students' university preferences. Placements in graduate programs are coordinated by the HEIs according to the regulations set by CoHE.

The current structure of the Turkish higher education system adheres to the three-cycle system (bachelor degree, master degree, and doctoral degree) introduced by the Bologna Process, reflecting

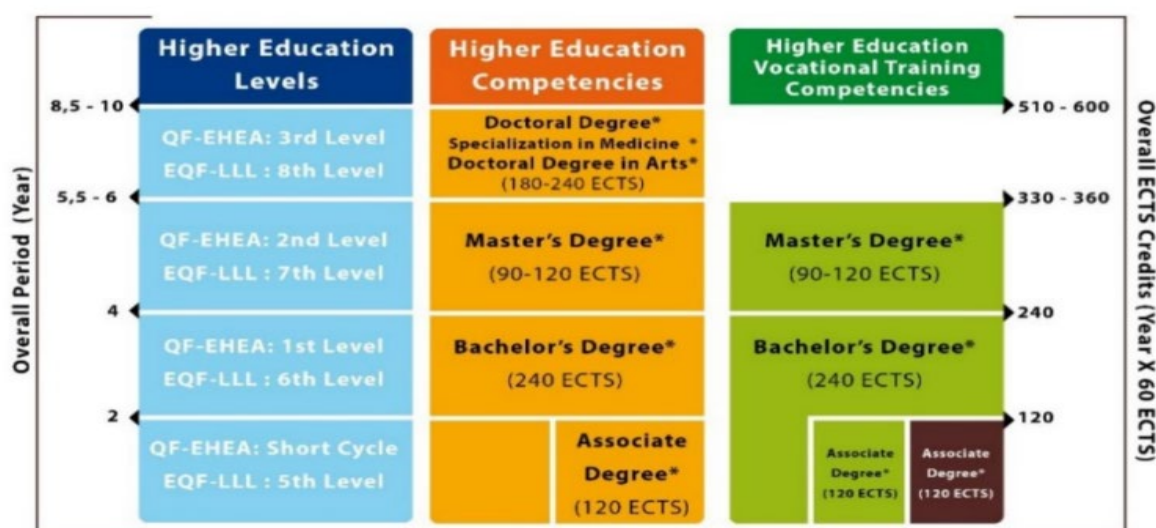
⁵ SAR, p.9

⁶ SAR p. 11

the fact that Türkiye has been a full member of the Bologna Process and the European Higher Education Area (EHEA) since 2001.

Additionally, the associate degree programs in the Turkish higher education system align with the short cycle (Short-Cycle QF-EHEA and 5th Level EQF-LLL), characterized as intermediate qualifications in both versions of the European Qualifications Framework.

Consequently, the current version of the Turkish Qualifications Framework (TQF) defines four cycles: associate, bachelor, master, and doctoral degrees⁷:



QUALITY ASSURANCE

The first quality assurance activities in the Turkish HE system had started in the early 90s when the Council of Higher Education (CoHE) was established. In 2005, a more systematic approach towards QA activities started with the establishment of the Commission for Academic Assessment and Quality Improvement in Higher Education (YÖDEK). With its establishment, HEIs were required to set up Academic Evaluation and Quality Improvement Boards (ADEK) which were required to evaluate the institutions' quality processes annually and to submit evaluation reports to YÖDEK. YÖDEK, the first national level quality initiative in the Turkish higher education system, operated until 2015 as a sub-commission of CoHE, but it was not an independent body.

A significant change in Turkish legislation was the adoption of the Higher Education Quality Assurance Regulation (2015) establishing the Turkish Higher Education Quality Board, which, in 2017, was reorganized and renamed as the Turkish Higher Education Quality Council (THEQC) – an institution solely responsible for HE QA activities.

Currently, Law No. 2547 sets the Council of Higher Education (CoHE), the Inter-University Council (ÜAK), and the Turkish Higher Education Quality Council (THEQC) as the key regulatory bodies responsible for higher education nationwide.

CoHE has a role in the planning, coordination, and governance of Türkiye's higher education system in accordance with the related articles of the Constitution of the Republic of Türkiye and Higher Education Laws. Its primary responsibilities include facilitating the implementation of educational activities, training academic staff according to requirements, monitoring and supervising the use of

⁷ SAR, p. 12

resources allocated to universities, and ensuring cooperation and coordination between HEIs in an integrated, continuous, coherent, and constructive manner in line with the principles and goals set for HEIs.

ÜAK comprising rectors, and elected university senate members, is responsible for the coordination of universities' educational, research, and publishing activities. This body analyses HEIs' practices, makes recommendations to CoHE and universities in regard to academic staff requirements as well as taking part in planning activities.

THEQC is responsible for cyclical evaluation and accreditation activities at institutional level. The agency also aggregates and shares the HEI evaluation results, organizes training and other events to further foster a quality culture, designs methodologies for institutional evaluation and accreditation, and, lastly, performs other activities related to quality assurance that do not fall under the scope of the ESG, such as the authorization of national agencies and recognition of international accreditation agencies.

The quality assurance activities on study program level, according to the SAR are voluntary in Türkiye and could be performed both by national and international agencies⁸. However, the results of the accreditation of study programmes are taken into account when considering the listing of these programmes as recognised qualifications within the TQF.

Other major bodies in the Turkish higher education system along with their duties are listed below:

- The Presidential Educational Policies Council, which was established in 2018 by Presidential decree as a strategic body responsible for policy recommendations on educational activities in line with Türkiye's goals, develops higher education strategies, monitors educational practices, and enhances activities through needs analysis;
- The Ministry of National Education (MoNE) is the national authority responsible for coordinating, implementing, monitoring and supervising the work for the formulation of educational policies and strategies, and updating and developing these policies and strategies in accordance with new service models for every level of education in the Republic of Türkiye, including pre-primary education (International Standard Classification of Education (ISCED 0)), primary education (ISCED 1) and secondary education (ISCED 2, ISCED 3);
- Centre for Assessment, Selection and Placement (ÖSYM) provides various examination and placement services required for the transition from secondary education level (ISCED 3) to the level of higher education (ISCED 5-8).
- Vocational Qualification Authority of Türkiye (VQA) collaborates in preparing National Occupational Standards in technical and vocational fields, ensuring the national qualification system aligns with EU standards and international quality assurance. VQA is the main responsible body for the Turkish Qualification Framework (TQF), which is referenced to the European Qualifications Framework (EQF). It oversees the development, implementation, and coordination of national qualifications and Europass documents.

THE TURKISH HIGHER EDUCATION QUALITY COUNCIL

First established in 2015 as the Turkish Higher Education Quality Board under the applicable regulation and restructured and renamed as the Turkish Higher Education Quality Council (THEQC) by the Law

⁸ According to the SAR, international agencies can perform accreditation of study programmes within Türkiye without THEQC's recognition, however national agencies are obliged to undergo THEQC's authorisation procedure.

on Higher Education No. 2547 in 2017, THEQC is a public legal entity, located in the capital of Türkiye, Ankara, solely operating in the field of QA in HE.

The agency is responsible for 3 main activities:

- to conduct external evaluation of HEIs;
- to execute the authorization process of national and recognition processes of international accreditation agencies;
- to ensure internationalisation and dissemination of a quality assurance culture in higher education institutions.

THEQC is also taking part in the legislation process, developing the criteria, methodology and procedures for external evaluation as well as accreditation procedures.

The agency's mission is *"to strengthen quality assurance systems in higher education in order to contribute to the continuous development of higher education institutions in Turkey and the achievement of universal qualifications by individuals"*.

The agency's vision is *"to be an effective and internationally recognized institution in the field of higher education quality assurance."*

The agency is operating according to its strategic plan. Currently, the plan, adopted for a 5-year period (2024-2028) sets out the goals of the agency:

- to develop evaluation approaches suitable for innovative learning and teaching models by reflecting the changes in the national and international higher education ecosystem to the internal and external quality assurance systems;
- to strengthen the national quality assurance system by ensuring the adoption and dissemination of quality in HEIs;
- to increase the effectiveness of quality communication to increase quality awareness of all stakeholders and to ensure the spread of a quality culture throughout the ecosystem;
- to ensure sustainable support of the higher education ecosystem by strengthening the institutional structure of THEQC,
- and to increase the international recognition, collaboration, and effectiveness of THEQC.

THEQC'S ORGANISATION/STRUCTURE

The agency is composed of the Council and the General Secretariat.

The Council is the collegial body responsible for defining national policies for quality assurance in higher education, THEQC's strategy, all decision-making carried out by THEQC (including decisions on appeals and complains), appointment of the experts and members of THEQC's commissions (e.g. the Student Commission, The Commission on Complaints and Appeals) and etc. The Council consists of 13 members, representing diverse stakeholders within the Turkish HE system: representatives elected by the Council of Higher Education (CoHE) (3 members), the Inter-University Council (ÜAK) (3 members), the Ministry of National Education (MoNE) (1 member), the Vocational Qualification Authority of Türkiye (VQA) (1 member), the Turkish Accreditation Agency (1 member), the Scientific and Technological Research Council of Türkiye (1 member), the Health Institutes of Türkiye (1 member), the Union of Chambers and Commodity Exchanges of Türkiye (1 member) and 1 student member. The Council members are elected for a period of 4 years (1 year for the student member

with the option of extending the tenure for one more year). The Council member can be elected and be in service for a maximum of two terms of 4 years each⁹ (with the exception of the student member).

The Council is represented by the President who is elected from among the Council members. The Council's work is supported by 8 local and international advisors.

The Secretariat is responsible for the execution and implementation of the decisions of the Council and for the provision of support for the agency as well. It consists of 3 units: Institutional External Evaluation and Registry of External Evaluation Agencies Unit, Publicity and Stakeholder Relations Unit, and Administrative Services Unit.

The Secretary General's duties include ensuring staff compliance and training, coordinating and supervising unit activities, recommending staff appointments, acting as rapporteur in Council meetings without voting rights, managing Council decisions and agenda distribution, announcing decisions, providing administrative services, engaging in legislative work, and fulfilling other tasks assigned by the President.

As there are legal limitations to changing the quantity of the units within THEQC¹⁰, the agency has come up with the solution of establishing 7 commissions, composed of staff members and Council members with the exception of the Commission on Appeals and Complaints and the Student Commission which are composed of external members¹¹:

1) Commission on Institutional External Evaluation and Accreditation (11 members, responsible for drafting the plan for IEEP activities, expert training, formation of expert teams, revision of Institutional Self-Evaluation reports (ISERs), consistency checking and preparing guidelines and documents to the Council for consideration and implementation).

2) Commission on Publicity and Stakeholder Relations (5 members, responsible for disseminating information about the higher education quality assurance system, organising meetings with internal and external stakeholders to gather their opinions, and informing THEQC's stakeholders by disseminating documents and maintaining the website with updated information);

3) Commission on International Relations (4 members, responsible for establishing international collaborations with counterparts, coordinating memberships to umbrella organizations within the QA field, organising events and activities with international stakeholders, proposing international experts to the Council);

4) Student Commission (11 Turkish student members and 1 THEQC representative, responsible for spreading a quality culture amongst students and enhancing student involvement in quality assurance processes, preparing student evaluator candidates through training and workshops to participate in evaluation programs, contributing to the writing of THEQC's Annual Status Reports;

5) The Ethics Commission on Scientific Research and Evaluation Processes (3 members, responsible for evaluating any breaches of THEQC's Statement of Confidentiality and Code of Ethics in external evaluation processes (based on complaints received) and presenting its findings to the Council, assessing any violations of the Statement of Confidentiality and Code of Ethics by accreditation agencies (outside the scope of ESG) and contributing to the overall ethical oversight of scientific research and evaluation processes);

6) Commission on Appeals and Complaints (3 external members, assessing appeals related to decisions made within various accreditation programs within the scope of ESG, complaints filed against any issue happening before, during and after the evaluation and assessing the appeals regarding the

⁹ For the appointment procedures of the Council members, see the evidence sections under standards 3.3 and 3.5.

¹⁰ The number of the units is embedded in the Law on Higher Education No. 2547, therefore in order to establish additional units, amendments to the Law should be adopted.

¹¹ <https://www.yokak.gov.tr/en/commissions/>

authorisation of national accreditation agencies and recognition of international accreditation agencies (outside the scope of ESG);

7) Commission on Recognition and Authorisation of External Evaluation and Accreditation Agencies (8 members, reviewing registry and recognition applications of external QA agencies and presenting them to the Council, providing program accreditation information to various stakeholders including CoHE, VQA, ÖSYM. The activities of this commission do not fall under the scope of ESG.

The agency has opted for and developed a process-based organisation to their work, derived from an engineering model.

The official organisational structure of the agency is provided in this chart¹²:



THEQC is involved in international networking: is a member of ENQA (since 2020), is listed on EQAR (since 2023) and takes part in different international organizations: the International Network for Quality Assurance Agencies in Higher Education (INQAAHE); the Council for Higher Education Accreditation-International Quality Group (CHEA/CIQG), the Asia-Pacific Quality Network (APQN), the Association of Quality Assurance Agencies of Islamic Countries (IQA).

THEQC'S FUNCTIONS, ACTIVITIES, PROCEDURES

The agency has 3 main responsibilities:

- to conduct external evaluation of HEIs;
- to execute the authorization process of national accreditation agencies and recognition processes of international accreditation agencies;
- to ensure internationalisation and dissemination of a quality assurance culture in higher education institutions.

The QA activities that fall under the scope of ESG are the following:

- Institutional External Evaluation Program (IEEP);
- Institutional Accreditation Program (IAP);

¹² <https://www.yokak.gov.tr/en/organization-chart/>

- the newly introduced International Institutional Accreditation Program (IIAP). The IIAP framework was developed, adopted and published in 2024, but at the time of the site visit, this activity had not yet been implemented.

The IEEP is a compulsory QA procedure that all HEIs in Türkiye are required to undergo. It is performed after an institution graduates its first cohort of students. Based on THEQC's Evaluation Criteria¹³, it is an external evaluation method that enables the evaluation of leadership, governance, quality, learning and teaching, research and development, and service to society processes in higher education institutions within the scope of the “planning, doing, checking and acting” cycle. The IEEP aims to reveal the institutions' strengths and areas for improvement through site visits based on the Institutional Self-Evaluation Reports (ISER) written by the institutions. The IEEP is intended to prepare HEIs for the upcoming institutional accreditation process in a constructive manner.

Institutional Accreditation Program (IAP): The IAP is an external evaluation method based on the same THEQC Evaluation Criteria. Only those HEIs that complete the IEEP process can voluntarily request to be included in this program that is designed to determine the level of HEI's compliance against the Evaluation Criteria. The output of this program, the Institutional Accreditation Report (IAR) is the basis for the Council's accreditation decision. However, if any HEI does not request to be included in IAP within 5 years following their completion of the IEEP program, then these HEIs are compulsorily included in the IAP program by THEQC.

If the outcomes of the accreditation under IAP program are positive (full accreditation for 5 years or conditional accreditation for 2 years) these results are sent to the Council of Higher Education to be published in the Higher Education Programs and Quotas Guide. A negative outcome (refusal of accreditation) does not mean the termination of HEI's activities: within a 2-year period, HEIs can work on addressing the issues raised and re-apply to the IAP program.

The aim of implementing the principle of continuous improvement is supported by the interim follow-up procedures: the Follow-up program (FuP), applied after the completion of IEEP and the Mid-term Evaluation Program (MtEP), applied 2 years after successful completion of IAP.

In 2024, the agency also introduced a new activity, the International Institutional Accreditation Program (IIAP), which, at the time of the site visit, had been adopted, published, but had not yet been implemented. The IIAP is a provisional cross-border external evaluation process in which non-national HEIs can apply for evaluation, based on the same THEQC Evaluation Criteria.

The agency is also responsible for the adoption and the review of the methodologies, guides and other methodological tools (e.g., Institutional Self-Evaluation Report (ISER) writing guide for HEIs), training, data collection and analysis, writing and publishing of the annual Higher Education Quality Assurance Status Reports, that comprise recommendations for quality improvement in national higher education. It also is responsible for the maintenance and support of the digital system, QAMIS, that is used to facilitate external evaluation procedures.

Another important responsibility which does not fall within the scope of the ESG is the authorisation of national agencies and the recognition of international agencies to be allowed to accredit in study programs offered in Türkiye. According to the SAR (p.15) a positive authorisation (recognition) decision leads to the inclusion of these reviewed programs in the Turkish Qualification Framework. Such programs can be included in the YKS Higher Education Programs and Quotas Guide, which is used for placement within the scope of the Higher Education Institutions Exam placements and contains information on programs accredited by THEQC-authorized or recognized accreditation agencies.

¹³ https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation-Criteria_3.1.pdf

The agency performs various activities to disseminate a quality culture which includes participating in different international projects (e.g., Implementation and Innovation in Quality Assurance through peer learning (IMINQA), organisation of biannual conferences and etc.

THEQC'S FUNDING

The agency is funded solely by the state under the Central Government Budget Law. According to the SAR, the allocated budget has increased annually since 2020 and has never been fully spent¹⁴ in any one year.

The agency's funding is provided in the following table¹⁵:

Year	Allocated Budget	Expense	Expense/Budget Ratio
2020	6,224,000	2,924,414	47%
2021	7,615,000	4,597,051	60%
2022	11,480,975	8,495,074	74%
2023	19,256,000	15,790,000	82%

Although the legislation permits the agency to receive additional funding, such as donations, financial aids and etc., such funds have never been received.

The agency does not receive payments from HEIs for evaluation and accreditation services; however, HEIs pay for the panel members' site visit expenses e.g., their travel, accommodation and meals.

Once the agency has implemented the IIAP with interested non-national HEIs, the agency will also receive additional income from these HEIs for this service.

¹⁴ SAR, p. 44.

¹⁵ SAR p. 44

FINDINGS: COMPLIANCE OF THEQC 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.

2023 EQAR conclusion:

“The Committee concurred with the panel’s recommendation of compliance with the standard. The Committee further underlined panel’s [suggestion] that the Student Commission of THEQC should consider more equal distribution of tasks among its members, in order to prevent overburdening of the one member responsible for the full representation of the council, but also to enable better inclusion of the diversity of students’ opinions in Türkiye.”

Evidence

According to the Turkish legal regulations¹⁶, THEQC is a body within the Turkish system of education solely responsible for the quality assurance in higher education at institutional level.

As a state institution, THEQC is obliged to function within the parameters of its strategic plan. The agency follows a practice of setting strategic goals for a period of 5 years. Two strategic plans are relevant for this evaluation: the plan covering 2019-2023 and the current plan which covers 2024-2028. Both strategic plans are available online in Turkish and English¹⁷.

The current strategic plan presents the key aspects of the agency: the mission, the vision, the values, strategic goals and performance indicators. It also describes the results of SWOT (Strengths, Weaknesses, Opportunities, Threats) and PESTLE (Political, Economic, Social, Technological, Legal, and Environmental) analyses, and the views of the stakeholders both in regard to the agency's performance to date and what should be addressed in the future.

THEQC's mission is “to strengthen quality assurance systems in higher education in order to contribute to the continuous development of higher education institutions in Türkiye and the achievement of universal qualifications by individuals.”.

THEQC's vision is “to be an effective and internationally recognized institution in the field of higher education quality assurance.”.

¹⁶ Article 35 of the Turkish Law on Higher Education No. 2547 and the Regulation on Higher Education Quality Assurance and the Turkish Higher Education Quality Council

¹⁷ <https://www.yokak.gov.tr/en/strategic-plan/>

The agency is committed to conducting its roles and responsibilities in line with its core values which are stated as: impartiality, transparency, ethical behaviour, independence, openness to collaboration, sustainability, innovativeness, inclusivity whilst maintaining a stakeholder orientation.

The strategic goals of THEQC for the period of 2024-2028 are:

- to develop evaluation approaches suitable for innovative learning and teaching models by reflecting the changes in the national and international higher education ecosystem in both internal and external quality assurance systems;
- to strengthen the national quality assurance system by ensuring the adoption and dissemination of quality in HEIs;
- to increase the effectiveness of quality communication to increase quality awareness of all stakeholders and to ensure the spread of a quality culture throughout the ecosystem;
- to ensure sustainable support of the higher education ecosystem by strengthening the institutional structure of THEQC;
- to increase international recognition, collaboration, and effectiveness of THEQC.

The agency carries out 2 external quality assurance procedures within the scope of the ESG:

- Institutional External Evaluation Program (IEEP);
- Institutional Accreditation Program (IAP).

A newly introduced activity (2024) within the scope of the ESG – International Institutional Accreditation Program (IIAP), at the time of this review, had not been implemented yet.

All these 3 activities comprise the cyclical quality assurance procedures, embedded in the methodologies adopted by the Council of THEQC: IEEP and IAP are described in the THEQC Evaluation Programs Guide¹⁸ (Evaluation Programs Guide), the IIAP is described in the THEQC International Institutional Accreditation Program Guide¹⁹. Both methodologies, laying out the purpose, procedure, criteria, the rights and the obligations of the participants and the consequences of the reviews, are published on the agency's website and are available in Turkish and English.

IEEP, IAP and IIAP evaluate the maturity of institutions against 14 criteria and 46 sub-criteria in accordance with the approach “plan-do-check-act” (PDCA). These procedures identify the strengths and the shortcomings within institutions and provide HEIs with recommendations for further improvement.

The IEEP is a compulsory QA procedure for all Turkish HEIs after an institution graduates its first cohort of students. This program results in recommendations for improvement in line with the Evaluation Criteria and is intended to prepare HEIs for the upcoming institutional accreditation process in a constructive manner.

HEIs that have successfully undergone an IEEP evaluation procedure, can voluntarily request to be included in the IAP program designed to determine the level of the HEI's compliance against the Evaluation Criteria. However, if an HEI does not request an IAP within 5 years following the successful completion of an IEEP program, these HEIs are compulsorily included in the IAP program by THEQC.

The output of this program is the Council's accreditation decision (full accreditation (5 years), conditional accreditation (2 years) and refusal of accreditation).

In contrast, the IIAP has a different audience, and targets cross-border HEIs that seek external QA outside of their home country. This procedure's outcome is an accreditation decision (full accreditation, postponement of accreditation decision or refusal of accreditation).

¹⁸ [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evalation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evalation_Program-guide_3.1.1%20(1).pdf)

¹⁹ https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

Since the last full ENQA review the agency has completed the following number of IEEP and IAP procedures²⁰:

Year	IEEP	FuP	IAP	IAP Decisions	MtEP	MtEP Decisions	IIAP
2016-19	158	n/a	n/a				n/a
2020	13	58	11	6 full, 5 conditional			n/a
2021	13	44	12	7 full, 5 conditional			n/a
2022	3	43	30	5 full, 25 conditional-			n/a
2023	2	25	21	3 full, 17 conditional, 1 refused	9	1 full, 2 conditional, 6 continued	n/a
2024	5	5	35	n/a	14	n/a	n/a

As of April 2024, 191 HEIs out of 208 in Türkiye have been evaluated through the IEEP (92%)²¹, 169 out of 208 through the Follow-up Program (FuP) (81%), and 74 out of 208 through the IAP (36%). 10 HEIs out of 74 have been accredited after the Mid-Term Evaluation Program (MtEP). In the 2024 cycle, THEQC is planning to evaluate 5 higher education institutions using the IEEP, 6 using the FuP, 35 using the IAP, and 13 using the MtEP.

At the time of reporting, as a result of completing the IAP process, 22 universities have been granted full accreditation, 51 universities have been granted conditional accreditation, and refusal of accreditation has been given to 1 university.

There are various modes of stakeholder involvement at THEQC. The first one is embedded in the Law on Higher Education No. 2547. Article 35 establishes the Council, which is the THEQC's decision-making body²². Although 12 Council members are elected by the external Turkish bodies or institutions, the one student member is appointed by the Council from the members of THEQC's Student Commission. The 12 members of the Council are appointed for a period of 4 years; however, the student member's tenure is 1 year with the option of extending the term of office for one more year²³ dependent on them remaining a student for this second year and their performance.

Other stakeholder involvement mechanisms established by the agency, include:

1) the Student Commission. This commission was active during the last full review, however since 2019, the number of Student Commission members has significantly increased (from 8 during the last review to 11 members in 2024). The selection of the members of this commission is described in the Directive on the Turkish Higher Education Quality Council Student Member and Students

²⁰ SAR p. 31. The numbers of follow-up procedures FuP (Follow-up Program), that are organised after the completion of IEEP and MtEP (Mid-Term Evaluation Program) that is organised after the completion of IAP are indicated separately.

²¹ IEEP is performed after the first cohort of students' graduate. As new HEIs have been established since the last review, there are institutions that haven't undergone this procedure as yet.

²² The full list of the institutions that elect the Council members is available at https://www.yokak.gov.tr/documents/mevzuatlar/AnnexI_THEQC_Establishment_Law.pdf

²³ Article 4 of Directive on the Turkish Higher Education Quality Council Student Member and Students Commission https://www.yokak.gov.tr/documents/mevzuatlar/EN-OK_YONERGESI_26_EKIM_2022.pdf

Commission²⁴. Article 6 of this directive stipulates that the members of this commission are selected from amongst students from different higher education institutions and fields, including education, fine arts, natural and applied sciences, engineering, health sciences, and social sciences programs. A minimum of one student enrolled in an associate or undergraduate degree program, and a minimum of one graduate student take part in the Commission. The eligibility criteria are described in Article 8 of the corresponding directive, emphasizing the aspects of student academic achievements and the impeccability of their reputation.

The announcement for Commission membership applications is published on THEQC's official website (Article 9 of the corresponding directive) and the received applications are assessed by THEQC's internal Preliminary Assessment Commission²⁵. The Preliminary Assessment Commission ranks the candidates who meet the application requirements according to the Pre-assessment Scoring Table to call them for an interview, from the highest score to the lowest score²⁶.

The Commission members are selected by the Council from the candidates proposed by the Interviews Commission²⁷ for the coming year, starting from the date of the assignment. During the panel's meeting with the student representatives, students confirmed that the selection of members to this Commission is clear, transparent and reflects the diversity of enrolled students. Advocating for students' active participation in QA procedures at their HEIs is one of the key goals of the Student Commission, implemented through supporting Quality societies / clubs in Turkish HEIs. Since the last full review, up to May 2024 the number of students' Quality societies increased from 129 in 65 provinces in 2022 to 158 in 75 provinces. The Student Commission also provides the Quality Ambassador Training Program (QAP) and the Quality Ambassador Workshop (QAW) aimed at training students to become active participants in QA processes, including their roles as student experts. These programs involve interactive training sessions on the evaluation criteria, ISER writing, and evaluation processes, fostering competence among students and fostering quality culture in general. The close cooperation between this Commission and the Quality societies / clubs, contributes to the identification of problems that are experienced by students in different Turkish HEIs and to the finding of possible solutions: during the site visit, the Council student member explained that as a Chair of the Student Commission he is actively involved in collecting information and feedback from students and conveying this directly to the Council. The students shared an example of this: students were complaining that they are not permitted to participate in study program evaluations and THEQC took measures to address and amend this. During the site visit, the President of THEQC mentioned that the agency is aware of the high number of enrolled international students in Turkish HEIs and so the agency is currently considering how to include these international students in this Commission.

2) Advisors. The agency is supported by local and international advisors (at the time of the site visit 5 local and 3 international experts, 8 in total). According to SAR²⁸, since the last full ENQA review, Advisors have replaced the Advisory Board following the recommendation of ENQA's 2019 review. The main purpose of THEQC's advisors is to support THEQC's Council with their expertise and knowledge. Advisors do not work as a collegial body; they share their insights and thinking individually on request from the Council. THEQC's advisors come from different academic fields and backgrounds, they have specific experience in different fields of QA (e.g. internal QA systems, risk management, strategic planning.). Local advisors are usually the senior academic staff from Turkish HEIs. International advisors enrich the agency's work with their experience of different QA practices implemented in different regions of the world (Germany, Slovenia and etc.). During the panel's meeting

²⁴ https://www.yokak.gov.tr/documents/mevzuatlar/EN-OK_YONERGESI_26_EKIM_2022.pdf

²⁵ This commission consists of the Student Member of the Council (the Chair of the Students Commission) and the Coordinator of the Student Commission, under the chairmanship of the Vice-President of the Council.

²⁶ The applications that fail to meet the requirements are not assessed.

²⁷ This internal commission consists of five people in total, including the Commission Chair, an evaluator, a student evaluator and one of the current Commission members, under the chairmanship of an academic who has served as a Council member or a rector before

²⁸ SAR, p. 18

with local and international advisors, the participants indicated that currently they felt deeply involved in the agency's activities, specifically providing feedback regarding drafts of the strategic plan, the SAR, the IIAP framework, internal quality assurance, and the relevance of methodologies. According to SAR (see page 18), current local and international advisors are found at: <https://www.yokak.gov.tr/en/council-staff/>.

Analysis

The agency has clear strategic goals and a mission that aligns with the purpose of the agency, stipulated in Article 35 of the Turkish law on Higher Education. In the panel's view, the strategic goals are realistic and in line with the agency's mission and purpose. These goals are transferred into the agency's annual work plans and the charts of the main and sub-processes²⁹, and communicated to the staff of the agency and other stakeholders as well. In the panel's meetings with the representatives from CoHE, the Presidential Council, HEIs, other governmental bodies, these stakeholders expressed their trust in the agency as a flagship institution, whose transparent procedures lead to quality enhancement.

The panel notes that the purpose of the agency “*evaluating the quality levels of education and research activities as well as administrative services of higher education institutions in accordance with national and international quality standards, and coordinating the processes of accreditation, internal and external quality assurance, and authorization of independent external evaluation organizations.*”³⁰ is realised through the main quality assurance activities within the scope of ESG: IEEP, IAP and IIAP. The expectations, rules, procedure, criteria, rights and obligations, outcomes and the consequences are stipulated in official THEQC documents, adopted by the Council and available online on the agency's website.

Although the agency's three programmes that fall within the scope of ESG, i.e. IEEP, IAP and IIAP, have different purposes, they all reflect a principled and coherent QA system: as an initial step, the IEEP program is dedicated to introducing the evaluation criteria as a formative exercise, providing recommendations for further improvement. The IAP program includes a regulatory function as it evaluates compliance in order to make an accreditation decision. The IIAP program is intended to develop the agency's internationalisation and experience in other countries. The panel does not see any overlaps between the procedures.

The panel appreciates the agency's efforts to articulate the core rationales for the methodologies. Outstanding examples of well-developed methodologic tools are the ISER writing guides and the Rubric, as they explain the evaluation criteria and sub-criteria in detail, as well as the training materials developed for students (the Quality Ambassador Training Program (QAP) and the Quality Ambassador Workshop (QAW)³¹.

The panel has thoroughly investigated the level of stakeholder involvement in the agency's governance and work.

Without question, the work of THEQC's Council demonstrates deep and systematic stakeholder involvement in the agency's governance. The performance of the Council's everyday duties, such as strategic planning, adoption of methodologies, review of performance indicators, as well as decision-making in QA activities, enriches the agency with the views and different perspectives of the various stakeholders on a regular and systematic basis.

THEQC's Council is composed of representatives from other state institutions (such as CoHE, MoNE, VQA, Turkish Accreditation Agency, the Scientific and Technological Research Council of Türkiye, the

²⁹ The agency has implemented a process-based internal management system, which determines the organisation of work through main and sub-processes.

³⁰ Article 35 of the Law on Higher Education No 2457.

³¹ These training events are specific for students.

Health Institutes of Türkiye) academics, a selected student and a member from the Turkish Union of Chambers and Commodity Exchanges.

Participants from the broader civic society, e.g. labour market, professional bodies, non-governmental organisations, were not only under-represented in the decision-making process, they also were not present during the site visit. Neither the SAR, nor the interviews have provided sufficient evidence that THEQC's collaboration with the employers, business and other labour market representatives is active.

In the panel's opinion, the expertise and insights from these stakeholders would broaden the agency's perspective and its capacities to address challenges, problems and opportunities across and within the Turkish HE system.

The panel examined the current extent of students' representation on THEQC's Council and the Student Commission. During the site visit the student member of the Council confirmed that his duties in the Council are equal to the other members and he feels confident and respected as an equal. The panel finds it important to note, that the interests of students³² are represented by a single student on the Council, selected from the Student Commission by the other Council members.³³ This means the Student Commission members have no influence on the selection of the student member within the Council. In the panel's opinion, the ratio of students to other Council members should be reduced by increasing the number of Council student members.

In the panels' opinion, the Student Commission selection procedure of is clear, designed to involve high achieving students from various study fields³⁴. The final decision to appoint a member to the Commission (or reappoint for a further year) lies in the hands of the Council.

The panel examined the reason for the disparity between the tenure of the student member (1 year with the option of extending the term of office for one more year) and the tenure of the other 12 Council members (4 years). During the site visit, the panel was told that the main reason for this shorter term of office is that the students gain full competences and expertise in QA only in their last years of study. Termination of a student's membership within the Council is automatic once the student is no longer enrolled at an HEI. Considering that there is an option to extend the student member tenure by one additional year (assuming they continue as a student), the explanation regarding the different length of student member tenure in the Council is reasonable, in the panel's opinion.

The panel appreciates the progress the agency has made in the field of student involvement across different bodies of the agency. The level of active involvement by members of the Student Commission was impressive. The participants reported that they find their work in advocating for student's rights and their involvement in QA very meaningful. During the site visit, the members of the Student Commission and other THEQC staff members expressed their satisfaction with the national picture as it shows the vast majority of Türkiye's districts already have student QA societies and clubs established. The panel also heard from senior agency staff who said that in addition to the Student Commission they see a need for a national student organisation, a body, typically appointing student representatives to various national bodies in different European countries. Since such a national student organisation does not currently exist in Türkiye, it is worth considering if the selection of

³² The number of students according to SAR for the academic year 2023-2024 is 6,950,142.

³³ Article 4 of The Directive on the Turkish Higher Education Quality Council Student Member and Students Commission https://www.yokak.gov.tr/documents/mevzuatlar/EN-OK_YONERGESI_26_EKIM_2022.pdf

³⁴ Articles 6 and 8 of The Directive on the Turkish Higher Education Quality Council Student Member and Students Commission https://www.yokak.gov.tr/documents/mevzuatlar/EN-OK_YONERGESI_26_EKIM_2022.pdf

student members could be given to the Student Commission (or other national student body established in future), without any involvement of the agency itself.

Following the recommendation issued by EQAR Register Committee in 2023, the panel has analysed the distribution of tasks within the Student Commission. During the site visit, members of this Commission described their tasks and responsibilities clearly. They explained that their tasks depend on their competences, profile and their experience. All of the students reported that they are equally involved and supported by the coordinator (THEQC's staff member). The panel did not find any evidence that the distribution of tasks within this commission is unbalanced. However, the panel noted, that the current composition of the Student Commission does not include international students. Selecting international students to the commission would contribute to a wider representation of student voices within THEQC.

The panel has also analysed THEQC's expressed plans to be involved in the establishment of a national student organisation. The panel considers establishment of nationwide student body as a very positive initiative in Türkiye, however, the agency's involvement should focus on supporting the independence of such a body and not revolve around QA activities.

The panel noted, that the agency closely cooperates with external local and international advisors, especially when the broader perspective is needed (e.g. advisors were involved in the preparation of SAR and were sharing their insights regarding the newly developed IIAP program). In the panel's opinion, the agency benefits from the involvement of the advisors, especially the international experts as they provide a perspective which extends beyond the national one.

All the interviewed stakeholders confirmed that they are in very close communication with the agency, their feedback and proposals, views and opinions are treated respectfully, and they expressed their trust in the agency.

Panel commendation I

The panel commends the agency's efforts integrating students into the agency's work and advocating for students' rights in HEIs through their active involvement, enabling students to engage with and enhance the QA culture in their HEIs.

Panel recommendation I

The panel recommends broadening the range of external stakeholders by considering the incorporation of stakeholders from other sectors.

Panel recommendation 2

The panel recommends further reinforcing the role of students in the governing body of the agency by: 1) exploring the possibility of increasing the number of student Council members; 2) enabling the Student Commission to elect the Council student representative(s).

Panel suggestion for further improvement I

The panel suggests that the agency's involvement in the establishment of a national student organisation should focus on enabling it to be independent and to cover a range of responsibilities, not solely related to QA.

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, the agency initially was established in 2015, as the Turkish Higher Education Quality Board within the scope of the Higher Education Quality Assurance Regulation of 23rd July 2015³⁵. This body was independent in decision-making, but not in terms of its official status and organisational structure.

In 2017, the amendment of the Law on Higher Education No. 2547³⁶ has set the legal grounds for the re-organisation of the agency, which, during this process, was also renamed The Turkish Higher Education Quality Council (THEQC).

This amendment of the Law has resulted in the agency becoming “<...> an independent legal entity with public and legal recognition, administrative and financial autonomy and a centrally allocated state budget with the purpose of evaluating the quality levels of education and research activities as well as administrative services of higher education institutions in accordance with national and international quality standards, and coordinating the processes of accreditation, internal and external quality assurance, and authorization of independent external evaluation organizations” (Article 35 of the Law on Higher Education No. 2547).

The agency’s duties, operational structure, responsibilities of the units are detailed in the Higher Education Quality Assurance Regulation.

Analysis

The legislation that the panel has been informed of (the Law on Higher Education, the Regulation) clearly validates THEQC’s official position in Türkiye as the sole body responsible for the external quality assurance in higher education, including the external institutional evaluation and accreditation of HEIs, defining national policies and strategies for quality assurance, setting the principles, criteria, quality indicators, disseminating quality culture, performing monitoring activities regarding quality assurance systems in higher education and etc. THEQC’s status as the official QA agency in Türkiye was also confirmed by all of the participants of the interviews, including the representatives of different Turkish authorities (CoHE, MoNE, Presidential Council, VQA), as well as by the representatives of HEIs, experts, students and other stakeholders.

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.

³⁵https://www.yokak.gov.tr/documents/mevzuatlar/THE_REGULATION_ON_HIGHER_EDUCATION_QUALITY_ASSURANCE_AND_THE_THEQC2023.pdf

³⁶https://www.yokak.gov.tr/documents/mevzuatlar/AnnexI_THEQC_Establishment_Law.pdf

2023 EQAR conclusion:

“While the Register Committee found the increase of permanent staff members to be a positive development, it noted that the dependency of the agency on staff paid by higher education institutions is still concerning for the independence of the agency. Following this, the Committee could not concur with panel’s conclusion and found that the agency remains to be partially compliant with the standard.”

Evidence

According to the Article 35 of the Turkish Law on Higher Education, THEQC is a public legal entity with administrative and financial autonomy and a dedicated budget, solely responsible for the quality assurance in higher education at institutional level.

Organisational independence

The same Article of the Law sets the structure of the agency, including the composition of the Council, as well as the internal structure of the General Secretariat (Secretary General and 3 Units: Institutional External Evaluation and External Evaluation Agencies Registry Unit, Publicity and Stakeholder Relations Unit and Administrative Services Unit).

The Council members are elected by stakeholder institutions³⁷ for a period of 4 years and the Council selects a student member from the Student Commission for 1 year (with the option of extending the tenure for one more year). According to the Article 35 of the Law on Higher Education, the Council members can be elected and be in service for a maximum of two terms of 4 years each (with the abovementioned exception of the student member).

The grounds for dismissing a member of the Council, stipulated in Article 5 of the Regulation on Higher Education Quality Assurance and the Turkish Higher Education Quality Council, are the following: failure to attend a total of four meetings in one year without a valid excuse, inability to work for more than six months due to illness, accident, or another reason.

The main responsibilities of the Council are the following: developing the national policies for quality assurance in higher education, development and approval of THEQC’s strategic plan, decision-making in all of the THEQC’s activities, the appointment of external experts, the student member of the Council and members of THEQC’s commissions (e.g. members of Student Commission, members of the Commission on Complaints and Appeals and etc.).

Although THEQC cannot autonomously change the number of the units within the agency³⁸, the allocation of staff to certain tasks is solely within the hands of THEQC. In order to circumnavigate limitations to change the number of units, the agency has developed a commission structure and a process-based management system that enable appointing employees to certain tasks outside the formal structure of the existing units.

Operational independence

According to the Law on Higher Education No. 2547 and the Regulation, the agency has a special budget fully funded by the state.

During the site visit, the responsible staff members explained that the budget for the upcoming period is firstly drawn up within the agency, then this draft budget is submitted to the Office of the President

³⁷ With the exception of the student member, which is appointed by the Council.

³⁸ As this is regulated by the Law No. 2547.

and reviewed there. After this step, the consolidated draft budget is submitted to Parliament for approval.

The evaluation is free for HEIs, with the exception of the costs of the experts' travel, accommodation and food expenses.

The Law, the Regulation and the methodologies demonstrate that the agency can independently model and adopt methodologies, criteria and the outcomes of the evaluation and accreditation, guidance tools, strategic plans, annual work plans and the descriptions of the processes, to spend the allocated budget, to plan evaluation and accreditation activities, to select external experts, to issue formal decisions, to assess the complaints and the appeals and to organise events, training and etc.

The staff members of THEQC are selected in accordance with a standardised procedure, applied across the Turkish public sector. There is a specific body that is responsible for the selection and the recruitment of all state employees. This body deals with all the requests from all state institutions in Türkiye. Therefore, the pace of recruitment and appointment depends on the workload of this body.

Currently, there are 44 staff members within the agency (34 permanent staff members and 10 members that were temporarily seconded to the agency from their permanent positions in HEIs). Permanent staff members are paid by THEQC, the 10 seconded experts that have been temporarily seconded to the agency from their permanent HEI positions continue to be paid by their HEI. Since the initial full review in 2019, the number of the permanent staff has increased significantly: from 10 in 2019 to 34 in 2024 (since the partial focus review in 2022, 5 new permanent employees have joined THEQC's staff).

Additionally, in 2024, 24 new permanent employees' positions were assigned to the agency after the Office of the Presidency of Türkiye granted THEQC's application. A call for 8 new employees has already been initiated, and a call for 16 more is expected to be initiated in 2025-2026.

As the President of the agency explained, the recruitment of these new staff members does not automatically mean the termination of the contracts with the 10 academic experts seconded from their HEIs to temporarily work for the agency. According to him, these seconded experts will remain at the agency for an indefinite period of time as the breadth of their knowledge, skills and experience is crucial to the agency's work.

Independence of formal outcomes

The provision of evaluation and accreditation activities is solely in the hands of the agency, including all decision-making which is the responsibility of the Council of THEQC. The integrity and the consistency of these procedures is ensured using diverse technological tools and various checks (training, QAMIS, consistency check by the Commission on Institutional External Evaluation and Accreditation, checks by the Council).

The impartiality of the agency's staff and governing bodies (the external experts, THEQC staff and the Council members) is safeguarded by the Code of Ethics³⁹. Every such participant must sign the Statement of Confidentiality. The Code of Ethics embeds the principles of professionalism, honesty and integrity and stipulates the main obligations for any participants involved in evaluation activities, including avoiding conflict / congruence of interests, not requesting (directly or indirectly) or accepting any gifts from staff of the institutions and organisations with which THEQC collaborates, reporting any cases of illegal activity or activity which seek to influence outcomes to the competent bodies, recusing themselves from activities that might represent a conflict of interest.

³⁹ https://www.yokak.gov.tr/documents/mevzuatlar/YuksekogretimKaliteKuruluEtikKurallar_EN.pdf

The recuse is understood as not attending meetings in which decisions are taken or deliberated on where a THEQC representative may be considered to have any conflict/congruence of interest. The names of those who declare that they are unauthorised to attend a meeting for these reasons are recorded. Conflict/congruence of interest between the institution where there is an ongoing process of evaluation/accreditation/authorisation/recognition/decision-making and those assigned to such process by THEQC is described by the following:

- Currently working or having worked in the last five years for the institution as an academic or administrative staff or adviser;
- Engaging in interviews to be employed by the institution;
- Being a former or active student of the institution;
- Having received an honorary degree from the institution;
- Having a spouse or a relative within the first degree of affinity who is a student or staff of the institution;
- Having non-financial official ties with the institution (e.g., board of trustees or advisory board membership and so on);
- Being or having applied to engage in a commercial relationship (purchase and sale of goods or services) with the institution within the last five years.⁴⁰

The issues of ethical behaviour are assessed by THEQC's internal Ethics Commission on Scientific Research and Evaluation Processes.

Analysis

Organisational independence

There is no doubt that the definition of the institution's purpose and their statutory, financial and administrative autonomy clearly demonstrates the state's trust in the agency and its important role. This distinguishes THEQC from other Turkish accreditation bodies, such as the Turkish accreditation agency (TURKAK), as it is solely responsible for the QA and accreditation of Turkish HEIs at institutional level.

However, as the Law also regulates very detailed administrative issues (e.g. titles and the number of units within the institution), even minor changes require significant bureaucratic procedures in order to make amendments to the Law in the Turkish Parliament. In short, changes to the organisational structure cannot be done independently by the agency; the authorisation of the Turkish Parliament is required.

During the site visit, the staff of the agency explained that the structure of the agency does not fully meet their needs currently, i.e. it is outdated (this structure dates from in 2017). Thus, until the Law is changed, the agency has to find ways to adapt within these constraints. In this light, the agency has supplemented its internal structure with 7 commissions and has adopted a process-based management system which allows it to appoint certain employees to certain processes outside the formal structure of the agency.

During interviews there were a number of cases when staff members could not clearly explain the extent of their roles and responsibilities, which unit they belonged to, or name the senior staff member to whom they were accountable. This was especially noticeable in instances where a staff member had been appointed to undertake responsibilities in several processes under different units. The system makes performance appraisal difficult as it may involve a number of line managers. A detailed reflection of this process-based management system is elaborated under ESG 3.6.

⁴⁰ The Code of Ethics, Article 5

https://www.yokak.gov.tr/documents/mevzuatlar/YuksekokretimKaliteKuruluEtikKurallar_EN.pdf

Although THEQC's efforts to adapt to the situation and think 'outside the box' can be praised, their organisational independence is, however, limited: the agency cannot fully change their structure (as this requires legal changes and the decision of a third party, i.e. the Turkish Parliament).

The number of staff members cannot be set solely by the agency. This requires the agreement of the Office of the Presidency of Türkiye. Although the agency makes a final decision upon selection of the candidates, another governmental institution, which is responsible for organising the national exam for the public sector institutions is also involved in the recruitment procedure. In the panel's view, this is another legal constraint limiting the independence of the agency.

Operational independence

Although the agency is entrusted to plan their budget, the final decision-making body that sets the funding is outside the agency (the Parliament). Although the funding has been increased annually in recent years, the agency's operational independence in this regard is limited.

The panel noted that the agency has a rather broad scope of activities that the institution can perform without any authorisation from third parties. The panel is very positive about the agency's sole responsibility in the field of QA in HE: the scope of their activities starts at shaping and adopting the methodologies and criteria and ending with formal evaluation and accreditation decisions. In a diverse EHEA landscape, this demonstrates a high level of trust from the state's perspective.

The panel has witnessed that the operational independence of the agency is clearly visible to all the stakeholders (governmental institutions, HEIs, students, external experts etc.) who view the agency as a competent and transparent institution.

The panel, however, finds the practice of the HEIs directly covering the travel, accommodation and meals' expenses for the external expert panels, as limiting their operational independence. Although none of the participants have identified this practice as a flaw, in the panel's view, this model leaves space for HEIs to take advantage of this process (e.g. offering expensive accommodation and food options) and to potentially compromise/ influence its outcomes.

The panel understands the agency's motivation behind being unwilling to terminate the cooperation with the 10 academic staff members, seconded from Turkish HEIs and to retain their knowledge and experience in the agency, even after the new permanent staff members commence working at THEQC. However, the panel agrees with the findings of the ENQA 2019 review and EQAR's conclusion, and views this type of employment as a threat to the agency's independence, especially when these seconded experts continue to be paid by their corresponding HEIs. Advance preparation of a plan for transmitting the knowledge and experience of academic experts to the permanent staff, could, in panel's view, contribute to the smooth integration of the newly recruited staff without the loss of expertise if it is planned and occurs within a reasonable time frame.

The panel understands that the limitations that the agency is subjected to come from the general legal framework of Türkiye; however, the panel views initiating dialogue with the responsible state institutions in order to update the structure of the agency to reflect their current needs as a crucial step in the development of THEQC.

Independence of formal outcomes

After becoming familiar with the IEEP, IAP and IIAP methodologies, the Code of Ethics, and post interviewing the representatives from HEIs, the Council members, and external experts, the panel could not find any evidence that might question the independence of formal outcomes.

In the panel's view, the Code of Ethics clearly articulates the agency's expectations for all the participants of the evaluation and accreditation activities to act in accordance with the principles of independence, transparency and integrity and to avoid any type of conflict of interest in their work.

The cases of conflict / congruence of interest, delineated in the Code of Ethics, cover different aspects of possible staff or expert connections with HEIs. Although this Code does not directly describe the probability of stakeholder influence regarding the outcomes of the evaluation and accreditation activities, an overall obligation to avoid any type of influence, to recuse from the hearing and the decision-making process (by physically removing oneself from the meeting) and report any cases of malpractice is assumed by signing the Statement of Confidentiality. The meetings with different THEQC's audiences indicated that the level of the awareness of the ethical behaviour and responsibility to act in accordance with the integrity and transparency is very high. THEQC's staff, external experts and HEIs share the same positive experiences and could not provide any examples of malpractice.

Panel recommendation 3

The panel recommends initiating discussion regarding the structure of THEQC with the responsible state bodies in order to propose possible changes to better address the agency needs going forward.

Panel recommendation 4

The panel recommends revising the existing practices related to site visit expenditures and to transfer the reimbursement of external experts' expenses from HEIs to the regulatory area of the agency.

Panel suggestion for further improvement 2

The panel suggests considering the preparation of a plan in advance in order to transfer the knowledge and experience of seconded academic experts to enable a smoother integration of the new staff

Panel conclusion: partially compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2019 ENQA Board recommendation:

"The development of further thematic publications should be part of the strategic planning or annual monitoring process in order to ensure that the production of such publications each year is costed in terms of staff workload and that there is a strategic approach to the selection of topics."

Evidence

According to the SAR, the most systematic and complex outcome of the thematic analysis activity is the Higher Education Evaluation and Quality Assurance Status Report (Status Report), annually prepared by the agency. The Status Reports not only consolidate the insights from the agency's external quality assurance activities within the scope of ESG, but they also analyse the feedback from the stakeholders regarding evaluation / accreditation procedures, the QA system in general, quality improvement and the impact of the agency's quality assurance procedures on the higher education environment.

Such reports are published on the agency's website and are available online⁴¹. Given that the Status Report is a large scale and complex document, which encompasses different activities of the agency, during the site visit, the Status Report for 2023 was not fully prepared⁴² and the last Status Report provided for the panel's scrutiny was from 2022. According to the SAR, the presentations from the international conference which was organised by THEQC in 2024 may also contribute to the thematic analysis activities. These presentations are to be reviewed and uploaded to the agency's website.

Following the recommendation from ENQA's Board, the agency has included thematic analysis into strategic planning activities, allocating specific funding for this activity. The agency has selected "service to society" as a specific focus area for 2024. The interviewed agency's advisors confirmed that they were also involved in these planning activities.

The interviews with different groups corroborated the Status Reports as a highly valuable source of information, improvement and inspiration.

During the site visit, the panel asked different groups about their expectations, role and level of involvement in thematic analysis activities.

The agency staff expressed their willingness to develop thematic analysis activities more systematically in the future, as they said that they consider it to be a very valuable opportunity to enhance the QA framework and the overall quality culture.

Agency staff reported that annual preparation of Status Reports is a very complex, time-consuming activity, that currently is the responsibility of existing staff, putting an additional task onto already heavy workloads. In addition, staff reported that the type of skills needed to carry out thematic analyses requires people with experience in carrying out research; a profile not currently sufficiently reflected in the agency staff body. During the site visit, agency staff had difficulty explaining how the area of thematic analyses was to be developed, and equally, they found it difficult to specify its potential benefits to the agency.

The meetings with different stakeholders did not provide any examples of their active participation in thematic analysis activities. The invitees did not identify any specific topics that from their perspective could be foci for future thematic analysis activities, nor they could express the possible benefits of this. In general, their feedback and insights were limited to Status Reports.

Analysis

The panel finds the Status Reports both informative and insightful and agrees with the stakeholders' opinions regarding their value to the Turkish higher education system.

The agency's systematic and cyclical approach to analysing the results of the quality assurance activities within the scope of ESG including the outcomes of this analysis – Status Reports – in the panel's view meet the concept and the definition of the ESG standard 3.4.

It appears that the previous full review has enabled the introduction of positive changes in the agency approach, which has supported the allocation of funds and the inclusion of the thematic analysis activities into the strategic plan. This has also included the identification of key areas for thematic analysis, supported by input from the advisors. The selected key theme – Service to Society – from the panel's perspective is very broad and rather abstract; further discussions at the agency could be beneficial for refining the main aspects to be addressed.

⁴¹ <https://yokak.gov.tr/raporlar/faaliyet-raporlari>

⁴² The Status Report for 2023 was published in the end of 2024.

The meetings with stakeholders revealed a general sense that the broad concept of thematic analysis and its benefits to the development of a quality culture as well as the extent of stakeholder involvement (i.e. the selection of themes, the process of analysis and intended outcomes, etc.) is not as yet fully clear to them. The panel had the impression that for most of the interviewees their understanding of thematic analysis is focused on and limited to the Status Report.

Interviews with the senior management also reflected a similar perspective, i.e. that thematic analyses is mainly if not solely related to the Status Reports. It was not wholly clear that the broader concept and its potential value, was fully appreciated by this group.

Considering this, along with the lack of available researchers to allocate to thematic analysis, it means that, in order to achieve the intended goal, the agency needs to continue working with stakeholders to allocate further resources to enable thematic analysis to be developed and embedded as a core QA activity. There is a wealth of data, e.g., evaluation results and recommendations, feedback received from the surveys, which could be used to identify topics/ foci and enable the thematic analysis. However, it needs planning along with an agreed approach to stakeholder involvement to enable it to become an integral and ongoing part of the agency's QA activities.

The panel appreciates the openness of the agency in explaining the lack of human resources that are needed to systematically develop the field of the thematic analysis, an issue that the agency has had since its initial review in 2019. There is an opportunity to address this, in the panel's view, with the recruitment of new permanent staff members who have the relevant research skills.

Although in the context of thematic analysis the panel found the agency to be in a similar place to that reported by the previous panel in 2019, additional staff with research skills will create an opportunity for further specifying, refining and developing relevant topics. This being the case, future thematic analyses should positively contribute to the growth of the quality culture of Türkiye.

In the panel's view, in the period before the next review, it would be beneficial to have discussions on the benefits of thematic analysis and the involvement/ role of stakeholders in this, with the agency's external stakeholder bodies. This would enable a clearer understanding of what it is, why it is important and how each group may benefit from their involvement in terms of relevant outcomes.

Panel suggestion for further improvement 3

The panel suggests having discussions on the benefits of stakeholder participation in the planning of thematic analysis so that the rationale underlying thematic analyses is better understood.

Panel conclusion: compliant

ESG 3.5 RESOURCES

Standard:

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

2019 review recommendations

"The panel recommends that the agency continues to improve the balance between permanent staff who are on the payroll of the agency and those who work as consultants/advisors/experts. It is crucial for an agency to build its own capacity and expertise based on its own staff. A clear allocation of tasks and responsibilities in

the permanent staff (functional profiles could be useful) and the establishment of an overall staff development plan, including annual training programs, are seen by the panel as useful measures in this field.

THEQC should strengthen the capacity of the core of professional permanent staff.

In order to safeguard the future sustainability of the agency, the THEQC's budget should be planned and designed as part of the strategic planning process, taking into account previous year's expenditure and upcoming years planned activities. Annual monitoring of the strategic plan is important in this regard."

Evidence

Human Resources

The agency consists of the decision-making strategic body, the Council, and the General Secretariat, which is responsible for the implementation of the Council's work and for the provision of the resources.

The Council consists of 13 members, elected by various stakeholders⁴³. There are two full-time positions within the Council – the President and the Vice-President⁴⁴. Their positions together with the Secretary General are paid by the state. None of these officials during their service can have any other positions in other institutions.

The main responsibilities of the Council are the following: developing the national policies for quality assurance in higher education, development and approval of THEQC's strategic plan, decision-making in all of the THEQC's activities, appointment of external experts, as well as the student member of the Council and members of THEQC's commissions (e.g. members of Student Commission, members of the Commission on Complaints and Appeals and etc.).

The Council usually meets once a month.

The General Secretariat is led by the Secretary General and consists of 3 units:

- Institutional External Evaluation and Registry of External Evaluation Agencies Unit;
- Publicity and Stakeholder Relations Unit;
- Administrative Services Unit.

The number and the titles of the units are set in the Law on Higher Education No. 2547. Various interviewees indicated that the current structure of the agency does not fully meet the needs of the agency; however, according to them, changing the law is a very complicated and time-consuming process in Türkiye. To facilitate the implementation of the strategic goals, the agency has come up with the solution organising their daily work through 7 THEQC commissions⁴⁵ and has embedded a process-based management system. The organisation of work within the agency is scrutinised under standards 3.3 and 3.6.

According to the SAR, currently there are 44 staff members that work at the agency (including the 10 experts who are permanent staff of different Turkish HEIs and that are temporarily transferred to the agency).

The following table demonstrates the increase in staff members since the last review⁴⁶:

⁴³ The full list of the institutions that elect the Council members is available at https://www.yokak.gov.tr/documents/mevzuatlar/AnnexI_THEQC_Establishment_Law.pdf

⁴⁴ Article 35 of the Law on Higher Education.

⁴⁵ The list of the commissions is provided under the section "THEQC's organization / structure".

⁴⁶ SAR, p. 35.

Type	2019	2020	2021	2022	2024 (SAR)	End of 2024
Permanent Staff	10	21	28	29	33	34
Academic Experts	8	7	10	12	10	10
THEQC experts	0	0	0	0	0	8

Since the initial review in 2019, 24 permanent staff members have joined the agency, bringing the current total of 34.

The agency has indicated that 8 more permanent staff members, also employed and paid by the agency (due to their expected competences in HE and QA they are called “THEQC experts” in the table above) are expected to join by the end of 2024 (by the end of 2026 the agency expects to employ 16 more of THEQC experts, 24 in total for 2024-2026).

The agency also relies on 10 “Academic experts”, that are seconded from Turkish HEIs. During the site visit the agency’s President explained that the recruitment of the newly appointed staff members does not automatically terminate the contract with the 10 seconded academic experts thus for an indefinite period of time they will remain at the agency.

Financial resources

The agency is a state-funded body. The main financial source for THEQC are budgetary allowances provided under the Central Government Budget Law. Although THEQC has a legal right to get additional funds, such as donations, financial aid etc., since the establishment of the agency such funding has never been received.

According to the SAR, THEQC's budget planning is aligned with the strategic planning process, as mandated by the Public Financial Management and Control Law No. 5018. This involves considering the previous year's expenditure and upcoming year's planned activities, ensuring budgets are tied to strategic objectives. As mentioned under the analysis of ESG 3.3, the final version of the agency’s budget is adopted by the Turkish Parliament after it is approved by the Presidential Office.

The agency has plans to receive additional financing from foreign HEIs through the implementation of IIAP. There is an annual growth⁴⁷ in the agency’s funding⁴⁸:

Year	Allocated Budget	Expense	Expense/Budget Ratio
2020	6,224,000	2,924,414	47%
2021	7,615,000	4,597,051	60%
2022	11,480,975	8,495,074	74%
2023	19,256,000	15,790,000	82%

Since 2020, the budget has never been fully spent; however, the rate of budget expenditure has grown from 47 percent in 2020 to 82 percent in 2023.

The agency performs a thorough monitoring of the implementation of the budget annually and publishes its financial report on their website. In accordance with Article 36 of the Court of Accounts

⁴⁷ Partially this growth adjusts to the inflation rates.

⁴⁸ SAR, p. 44

Law no. 6085 and article 68 of the Public Financial Management and Control Law no. 5018, the financial affairs and transactions of THEQC are subject to examination and audit by the Court of Accounts.

The IEEP and IAP procedures are free of charge for HEIs, excluding the experts' travel, accommodation and meals' expenses that HEIs are obliged to cover. The experts that take part in these procedures do not receive any honorarium.

Other resources

The agency is situated in spacious premises, located in a quiet part of Ankara. There are two meeting rooms at the agency that can facilitate meetings and small conferences. The office is well-equipped, there are spaces to eat and relax and the premises are adapted to the people with disabilities. The agency offers the opportunity to work from the office and as well as remotely.

The agency has developed a multifunctional digital system, the Quality Assurance Management Information System (QAMIS), that facilitates the management of different steps in evaluation and accreditation processes. This modular system allows different participants of the evaluation and accreditation procedures to perform their duties:

- 1) HEIs can submit ISERs, view the proposed composition of the panels and respond, can view and comment the draft of the report and etc.;
- 2) Experts can view ISERs, their annexes and can prepare the draft of the report;
- 3) Agency can monitor the whole procedure, perform 360-degree surveys;
- 4) QAMIS also allows the candidates who want to be listed in the expert pool to submit their applications;
- 5) The system allows the submission of propositions and complaints, that are not related to the provision of THEQC's activities within the scope of ESG (e.g. complaints connected to the work environment, infrastructure and etc.). The submission of the complaints that are related to THEQC's activities within the scope of ESG is regulated by the Turkish Higher Education Quality Council Directive of Complaints and Appeals and is described under ESG standard 2.7. The system was created and is maintained by permanent staff at THEQC.

Analysis

Human resources

The panel noted that since the last review, the agency has made visible progress ensuring the growth of the number of the permanent staff. This development is in line with the panel's recommendation formulated in 2019. In the light of the growing workload within the agency caused by the implementation of the already existing procedures, IEEP and IAP (including the follow-up activities: the Follow-up Program and the Mid-term Evaluation Program) and the introduction of a new activity, IIAP, the establishment of 24 new permanent positions within the agency is logical and is apparently necessary. However, as these new permanent staff members will not join the agency at the same time⁴⁹, and their training will be time-consuming, the agency might face the risk of not having sufficient human resources or face the problems of staff burnout in the intervening period prior to this recruitment. In the panel's view prior to the full integration of 24 new employees, THEQC should very carefully monitor their capacity to initiate new activities, i.e. the evaluations under IIAP, launching new projects, etc.

The panel appreciates the competences and dedication of the agency's staff. Although the management of THEQC has confirmed that the staff is fully capable of fulfilling their responsibilities according to the Strategic Plan, after interviews with the staff, the panel understood that the workload is quite

⁴⁹ The agency predicts that all 24 staff members will join the agency in 2026 at the latest (8 new members a year).

heavy. The agency has not provided sufficient evidence that the workload is systematically monitored within the units (processes). In the panel's opinion, one of the main elements of a positive working environment is a balanced workload. Thus, systematic monitoring of workload in relation to daily activities could help in identifying potential issues and challenges before they become problems, and enabling steps to be taken to address them in a timely fashion.

The panel has analysed the work organisation of the agency and has identified the mismatch between the official structure of the agency (the agency's General Secretariat is divided into 3 units) and the actual organisational structure that involves the 7 internal commissions and the process-based internal management system. As a part of IQA, the efficiency of this organisational structure is analysed in details under the ESG 3.6.

The panel has also considered the agency's plans to retain the 10 HEI seconded employees after the 24 new staff members commence working at the agency. As mentioned under the analysis of ESG 3.3, although the panel understands the agency's plans to retain the knowledge, competences and experience of these highly experienced experts, it would be beneficial for the agency to focus on the capacity building within the permanent staff members, as was already recommended in the 2019 review.

Financial resources

The panel has witnessed the large nominal growth of the dedicated budget, which is partially explained by the adjustments to address inflation within the country and the plans to spend the increased allocated funds. The provided evidence supports the SAR's statement that the funding is sufficient to reach the annual strategic goals and to cover THEQC's expenses.

After the interviews with agency's staff, the panel has a clear understanding that the budget is planned in line with the strategic planning, as is required by the law. This demonstrates that the agency meets the expectations of the 2019 review panel.

Other resources

The premises are more than sufficient for the current number of staff members. However, the addition of 24 new staff members brings additional challenges in rearranging the office or moving to a more spacious premises.

The panel has noted that QAMIS is a very well-developed tool which facilitates the various participants of evaluation and accreditation procedures to work in the same digital environment. The system also positively affects the integrity of the agency's processes, reduces bureaucracy and saves time. In the panel's view, the fact that the system is fully operated, maintained and supported by THEQC's staff, makes the agency independent from third parties (IT companies), enables them to quickly address any problems and to ensure the safety of the personal data of those who have registered in the system. The panel was assured of the staff's IT competences allowing them to monitor the system's relevance, to support it and to adapt the system effectively and quickly.

Panel commendation 2

QAMIS is an innovative digital tool that facilitates the work of the various participants of the evaluation and the accreditation procedures. The system positively affects the efficiency and integrity of the agency's QA activities.

Panel suggestion for further improvement 4

The panel suggests adding systematic monitoring of staff workload to the agency activities.

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.

2023 EQAR conclusion:

“The Committee acknowledged the improvements and concurred with panel’s conclusion of compliance, but underlined the panel’s [comment]. The next review should therefore evaluate the full circle of agency’s internal quality assurance – from the feedback/data gathering to the actual changes in the agency’s processes and work.”

Evidence

The agency does not have a separate document that is specifically dedicated to consolidating all internal QA policies and activities within THEQC. The elements of this system are embedded into various internal documents, procedures and practices.

THEQC’s quality policy principles and the goals are set out in the current Strategic Plan⁵⁰:

- To continuously improve services offered in line with the expectations of stakeholders.
- To provide an environment that will strengthen the quality culture inside and outside the Council.
- To ensure service quality through a strong internal quality assurance system.

The Strategic Plan which is prepared with the involvement of various stakeholders is adopted by the Council of THEQC. This plan not only sets the goals for the upcoming period of 5 years, but it also includes the list of performance indicators. These indicators are then transferred to annual working plans and the annual descriptions of the main and sub-processes.

The agency is guided by these values: impartiality, transparency, ethical behaviour, independence, openness to collaboration, sustainability, innovativeness, inclusivity, stakeholder orientation. The agency’s internal quality system is based on the approach of Plan-Do-Check-Act (PDCA).

During meetings with the agency’s staff, the panel was provided with an explanation that quality policies are embedded in the evaluation and accreditation methodologies as well as other documents adopted by the Council of THEQC:

- The Evaluation Programs Guide⁵¹ which sets out the framework for IEEP and IAP procedures;
- The International Institutional Accreditation Program Guide⁵² which sets out the framework for the IIAP;
- The Code of Ethics⁵³ which sets out the ethical standards for the Council members, staff and external experts, including provisions that prohibit any types of intolerance and discrimination;
- ISER writing guides that help HEIs to prepare high-quality ISERs.

The panel was provided with the sufficient evidence that these documents are regularly revised and updated with close participation of different stakeholders. The detailed analysis of these processes is provided under ESG 2.2.

Feedback from the stakeholders is also collected and analysed through the surveys. After each evaluation, the agency performs a so-called 360-degree feedback collection when all participants of

⁵⁰ https://www.yokak.gov.tr/documents/site-stratejikplan/EN_Yokak_2024_2028_Stratejik_Plan.pdf

⁵¹ [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20(1).pdf)

⁵² https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

⁵³ https://www.yokak.gov.tr/documents/mevzuatlar/YuksekokretimKaliteKuruluEtikKurallar_EN.pdf

the evaluation (HEI's representatives and external experts) can reflect on their experiences. The digital system QAMIS allows participants to submit complaints⁵⁴ as well as suggestions for improvement. According to the SAR, this feedback is analysed in the Annual Status report. These reports analyse the findings of the THEQC's QA activities that fall within the scope of the ESG and also analyse the collected stakeholder feedback. For more detailed information about Status Reports please check ESG standard 3.4.

During the interviews with stakeholders, both the representatives from HEIs and external experts have confirmed that agency staff is very supportive throughout all evaluation and accreditation procedures.

In 2023, THEQC has established an observer position within the external evaluation teams. According to the Procedures and Principles on the Duties and Responsibilities of Observers in the Turkish Higher Education Quality Council⁵⁵, the main role of the observers that are usually appointed from THEQC's staff, is to safeguard the integrity and consistency of the evaluation process. This does not include the active participation in the discussions during the site visit, making changes to the panel's practices and judgement on evaluation, contributing to the writing of the preliminary draft and final version of the report, performing tasks by the team leader like a team member. The observers can be included in each procedure within the scope of ESG.

The consistency of the outcomes of the evaluation and accreditation procedures is ensured through a consistency check which is performed by the Commission on Institutional External Evaluation and Accreditation and during the Council meetings. This aspect is further analysed under ESG 2.5.

The agency's internal structure is set out in the Law on Higher Education No 2547. There are 3 units⁵⁶ within the General Secretariat that were established to facilitate the implementation of the Council's decisions and to ensure the provision of resources, necessary for the functioning of the agency.

During the interview with the management, the panel learned that the division of the agency's General Secretariat in 3 units, which is set in the Law⁵⁷, does not fully meet the current needs of the agency as it has gone through changes and developed significantly since 2017. The establishment of internal commissions and the implementation of the process-based internal management system, are, in the agency's view, enabling measures to adapt the legally required structure to the current situation and to manage the workflow more efficiently⁵⁸. According to the senior management, changing the law is complicated in Türkiye, especially when the extent of the changes is minor and significant only for the agency internally; however, the changes in the official structure of the agency would be very much welcomed by the agency's staff.

⁵⁴ Such complaints are not related to the provision of THEQC's activities within the scope of ESG (e.g. complaints connected to the work environment, infrastructure and etc.). The submission of the complaints that are related to THEQC's activities within the scope of ESG is regulated by the Turkish Higher Education Quality Council Directive of Complaints and Appeals and is described under ESG standard 2.7.

⁵⁵ <https://www.yokak.gov.tr/documents/mevzuatlar/ProceduresandPrinciplesRegardingTheDutiesandResponsibilitiesofObserversinEvaluationsPrograms.pdf>

⁵⁶ Institutional External Evaluation and Registry of External Evaluation Agencies Unit, Publicity and Stakeholder Relations Unit and Administrative Services Unit.

⁵⁷ This structure was set in 2017.

⁵⁸ According to the management, changing the law is very complicated in Türkiye, especially when the extent of the changes is minor and significant only for the agency internally, however the changes in the official structure of the agency would be very much welcomed.

The panel has analysed the Organisational Structure Chart, the list of the staff that is available on THEQC's website⁵⁹ and in the SAR. However, the attribution of staff members to certain units remained unclear. This question was raised during the first clarification session with the agency's resource person and during interviews with the various groups of THEQC personnel. The agency was also asked to provide a more detailed chart, showing the allocation of staff to certain units.

However, the panel noted that the majority of the staff could not give a coherent answer to this basic question: they could not clearly indicate their senior staff member, also they faced difficulties explaining firstly, who can delegate new tasks and secondly, to whom they are accountable within the agency's structure, i.e. who their line manager is.

The additionally provided Organisational Structure Chart indicates that the agency implements their daily tasks through 5 main processes and 34 sub-processes that are linked to 3 units.

The main processes are the following:

- Higher Education Evaluation Main Process;
- Authorization and Recognition Main Process;
- Quality Culture Development and Dissemination Main Process;
- Administrative and Support Services Main Process;
- Administrative Processes Main Process.

The main processes are divided into smaller sub-processes, e.g., Higher Education Evaluation Main Process has the following 9 sub-processes: Methodology Development and Update Sub-Process, Internal Evaluation Planning and Reporting Sub-Process, External Evaluation Sub-Process, Institutional Accreditation Sub-Process, External Evaluator Selection and Progression Sub-Process, Status Report Writing Sub-Process, Training Sub-Process, Mid-Term Evaluation Sub-Process and International Institutional Accreditation Sub-Process.

This scheme also includes sub-processes dedicated to internal quality assurance: Quality Management Sub-Process and Process Management Sub-Process.

The staff members are appointed to the processes or sub-processes rather than to the units. This structure also includes internal commissions that facilitate the cooperation of the Council members and THEQC's staff. The detailed list of these commissions and their functions is provided under the section "THEQC's organisation / structure.

According to the SAR (p. 46), the management of processes and sub-processes are supported with RACI matrices⁶⁰. RACI matrices are used to systematically execute internal quality assurance activities, based on performance indicators identified to monitor each workflow. The agency has established a separate Quality Management sub-process dedicated to the development of internal quality within the agency.

The site visit revealed that the adoption of a processes approach as the internal management system has been derived from an engineering model. Consequently, all the operations of the agency are now represented accordingly with associated performance indicators.

The management of the agency expressed their satisfaction with the current organisation of the workflow within the agency. However, the interviews with various staff members demonstrated some inconsistencies in the practical implementation of this internal process-based management system.

⁵⁹ Since the launch of THEQC's new website, the list of the staff was updated specifying the employees' fields of responsibilities.

⁶⁰ The RACI matrix is a project role and responsibility assignment chart that diagrams every task, milestone, or key decision to assign team roles across four categories: Responsible, Accountable, Consulted, and Informed.

Although in the provided documentation, the processes and sub-processes are linked to the units, the vast majority of staff described their roles in terms of the processes (sub-processes) and different commissions, and did not mention how they are involved in the activities of the units.

The interviews with different staff members and the detailed Organisational Structure Chart both revealed that in some cases one staff member can be appointed to several processes (sub-processes) and internal commissions; these processes (sub-processes) can be linked to different units. The interviewees could not clearly explain the relationship between their roles in different processes, commissions and units. These difficulties also occurred when explaining the distinctions of roles within the various processes and commissions.

In addition to that, the panel has learned that various similar tasks are delegated to a staff member by different owners of the processes (line managers), e.g. the employee that is responsible for organising the surveys can be asked to perform several surveys relevant to different processes (sub-processes) at the same time. The panel was not provided with a coherent answer as to who in this case is responsible for defining the sequence of performing these tasks. The panel also learned that the monitoring of the performance indicators and the implementation of the strategic goals are in the hands of one employee, without any in-depth involvement of senior management.

Following the EQAR conclusion, the panel investigated the full circle of the agency's internal quality assurance – from the feedback / data gathering to the actual changes in the agency's processes and work. The SAR provides evidence about how the feedback from various stakeholders has materialised into actual changes in the agency's methodologies⁶¹. An example of the practical implementation of the full circle of the agency's internal QA system is demonstrated by an instance in which the ISER writing guide was changed. These proposed changes were initiated by the HEIs, which expressed their request to clarify and simplify the ISER writing guide. After receiving this feedback, the agency started reviewing existing methodologies in close cooperation with the HEIs. During the site visit, the HEIs' representatives expressed their satisfaction with the existing methodologies, defining them as clear and transparent.

In addition to this, the students provided the panel with an example of how their feedback led to the changes in the agency's work. The students were not satisfied with the requirement that they pay their own travel and accommodation expenses, reimbursed only after the site visit. This issue was shared with the members of the Student Commission and later communicated to the senior management and the Council. According to the students, this led to the positive changes in the system whereby now student expenses are paid upfront.

Analysis

Although the principles and elements of THEQC's internal quality assurance system are embedded in different documents, the actual framework of the methodologies and other documents concerning the external QA activities (i.e. the IEEP, IAP, IIAP guides, ISER writing guides, the Code of Ethics, etc.) are clear. The implementation mechanism is coherent with the quality policy goals envisaged in the Strategic Plan. The agency puts considerable effort into ensuring the clarity of their methodologies and other materials and, in the panel's view, this has a positive impact: all the participants of the site visit claimed that the procedures are clear and transparent. During the site visit, both HEIs and external experts confirmed that the agency is very forthcoming with consultations and support when needed.

The panel appreciates the agency's motivation to get feedback from the stakeholders when it is possible, e.g. after evaluations, different events, training sessions, etc. After scrutiny of the Status Reports, the panel has noted, that the majority of the responses about the performance of the agency

⁶¹ The changes of the methodologies are described in details under ESG standard 2.2

are very positive⁶². The interviewed stakeholders, especially students and HEIs' representatives, felt highly engaged and heard by the agency.

However, the agency's internal quality management system, in the panel's view, raises several concerns.

First of all, the panel noted that there are two different organisational structures within the agency: the official one, which is set by the Law and the actual one which is established by the agency. The evidence which was collected during the site visit, i.e. the staff's confusion answering questions regarding their roles and responsibilities within the units, leads to the panel's impression that the official structure that is published on the website containing 3 units is not, in practice, being applied and is relatively unfamiliar amongst the staff members.

Although the detailed organisational structure that was prepared and provided to the panel links the 5 main processes and 34 sub-processes to the units, this link is rather artificial, not sufficiently communicated to the staff and not practically applied. Although the processes and sub-processes are linked to the units, the vast majority of the staff did not mention units when describing their roles and responsibilities: they viewed their positions only in the context of the processes and the commissions.

The staff's confusion was also apparent when explaining their daily workflow. In cases where the staff members were appointed to several processes or sub-processes and internal commissions, they could not clearly name the senior staff to whom they are accountable or the employees who are accountable to them. The staff members were unable to describe the differences in their roles in processes (sub-processes) or in corresponding commissions.

This leads to the panel's conclusion that the implemented internal process-based management system, that is designed to maintain 3 units, 5 main processes, 34 sub-processes and THEQC's 7 commissions is complicated and, in its current state, is not working effectively as an internal quality assurance system for the agency. The extent of the staff's confusion explaining their daily roles, responsibilities and their accountability raises a question as to the transparency, efficacy and the efficiency of this part of the internal QA system.

Having become familiar with the detailed list of processes, the panel also has concerns regarding the efficiency of the monitoring of the performance indicators. These indicators that are listed in the Strategic Plan are monitored solely by one employee who is not actively involved in strategic planning activities.

In the panel's view, all these inconsistencies require the attention of the agency's staff and the Council, especially in times of significant changes within the institution (including the growing workload, the introduction of new procedure IIAP and the recruitment of 24 new employees).

The panel noted, that the collected evidence and testimonies of the different interviewees, confirms that the feedback received from various stakeholders is taken seriously by the agency, is thoroughly analysed and in number of cases had led to the actual changes in the agency's legislation and daily work.

Panel recommendation 5

The panel recommends reviewing the existing internal process-based management system in order to simplify and clarify issues such as an employee's line manager and lines of accountability.

Panel suggestions for further improvement 5

The panel suggests strengthening the process of the monitoring of the performance indicators including involving employees with a role in strategic planning.

⁶² https://www.yokak.gov.tr/documents/StatusReports/StatusReport_2022.pdf

Panel conclusion: partially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

Evidence

Since its establishment in 2015 and reorganisation in 2017, the agency has undergone one full review in 2019 and one partial review in 2022. This was after EQAR rejected their registration application in 2021.

During these reviews the agency was provided with valuable recommendations for the further improvement. EQAR also pointed out the areas which required the agency's attention.

With the intention of remaining a member of ENQA and of maintaining their EQAR registration, the agency applied for an ENQA-coordinated review in 2024.

Analysis

The panel has taken into consideration the fact that the agency has been operating for less than 10 years and underwent its first ENQA-coordinated review only in 2019.

The fact that the agency applied for this review acts as evidence of compliance with this standard.

The guidelines for 3.7 emphasise reflection and the cyclical review process as a means for ensuring that the agency and its stakeholders continue to adhere to the principles enshrined in the ESG.

According to the SAR, the agency started the implementation of panel recommendations immediately and, in between the first and second full review, this was continued.

During the site visit, almost all groups confirmed that they see ENQA's review as an opportunity for the strengthening of the agency and the enhancement of higher education quality culture in Türkiye.

The reflection sections in the agency's SAR demonstrate THEQC's experiences that were obtained analysing the recommendations and implementing them in the Turkish HE environment.

In the panel's opinion, the agency has made significant progress since the last review and has implemented a number of recommendations; however, some of the recommendations (especially under ESG standards 3.5, 2.1, 2.3 and 2.4) that were not addressed by the agency have been made once again in this review.

In the panel's view, the current level of the agency's maturity and its' compliance with ESG allows it to be more open during its next review about the shortcomings and the challenges it has faced and continues to face. These reflections, insights and experiences could be reflected on and shared with THEQC's employees and relevant stakeholders.

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.

2019 review recommendation

"The panel recommends that the agency provide more focus on the provision of feedback on the ISERs which are elaborated by HEIs, in order to increase the impact of these reports on the quality improvement of institutions and to further develop their capacity to align with the standards in part one of the ESG."

Evidence

According to the Turkish QA framework, HEIs should meet the requirements that are stipulated in the publicly available Evaluation Criteria⁶³. The level of compliance is measured by the teams of external experts according to the Plan-Do-Check-Act (PDCA) approach reflecting the HEI's maturity level regarding each evaluation criteria (scale from 1 to 5, when 5 is awarded when HEI's level of maturity is the highest). In order to articulate this QA system, THEQC came up with an idea to prepare the Rubric, a methodological tool, linking the evaluation criteria with certain maturity levels. After its' introduction to the HE community in 2020, the agency has further developed the Rubric introducing samples of evidence that demonstrate a certain level of compliance (2022).

The QA framework established by THEQC is implemented through 3 external quality assurance activities that fall within the scope of the ESG (Institutional External Evaluation Program (IEEP), Institutional Accreditation Program (IAP) and International Institutional Accreditation Program (IIAP)).

Both Evaluation Criteria and the Rubric are available on the agency's website. Although the list of evaluation criteria and the Rubric are almost identical for national and international procedures, THEQC prepared separate documents:

- For IEEP and IAP procedures (THEQC Evaluation Criteria⁶⁴ and Evaluation Programs Guide⁶⁵);
- For IIAP procedure (IIAP Evaluation Criteria⁶⁶ and International Institutional Accreditation Program Guide⁶⁷).

Since the initial review in 2019, the list of the criteria was revised (2020) and simplified⁶⁸. In 2023, the agency mapped the list of national evaluation criteria with the ESG. The same procedure was performed with the international criteria which is relevant for the IIAP program (2024).

Currently, the set of evaluation criteria for both national and international evaluation and accreditation activities consists of 4 headings, 14 criteria and 46 sub-criteria.

⁶³ https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation-Criteria_3.1.pdf

⁶⁴ https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation-Criteria_3.1.pdf

⁶⁵ [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20(1).pdf)

⁶⁶ https://www.yokak.gov.tr/documents/international-doc/EN_UKAP_DEGERLENDIRME_OLCUTLERI_v.1.0a.pdf

⁶⁷ https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

⁶⁸ The detailed analysis of the changed criteria is provided under ESG standard 2.2.

According to the SAR, Evaluation Criteria⁶⁹ and the evidence that was received during the site visit, this list of criteria is prepared following the standards that are set in Part I of ESG (parts A “Leadership, Governance and Quality” and B” Learning and Teaching”) and complemented by the requirements that are significant on the national level (parts C “Research and Development” and D “Service to Society”).

The SAR offers a very detailed comparison on how each standard reflects the Part I of ESG (p. 51-53) and also provides a summarised version that is laid out in this table:

THEQC Evaluation Criteria	ESG Part 1 Standards
A. LEADERSHIP, GOVERNANCE AND QUALITY⁵¹	
Leadership and Quality ⁵²	1.1 Policy for Quality Assurance 1.10 Cyclical External Quality Assurance
Mission and Strategic Goals	1.1 Policy for Quality Assurance 1.10 Cyclical External Quality Assurance
Governance Systems	1.1 Policy for Quality Assurance 1.10 Cyclical External Quality Assurance
Stakeholder Involvement	1.1 Policy for Quality Assurance 1.10 Cyclical External Quality Assurance
Internationalization	1.1 Policy for Quality Assurance 1.10 Cyclical External Quality Assurance
Information Management System	1.7 Information Management
Public Disclosure and Accountability	1.8 Public Information
B. LEARNING AND TEACHING	
Program Design, Evaluation and Update	1.2 Design and Approval of Programmes 1.9 On-going Monitoring and Periodic Review of Programmes
Implementation of Programs (Student-Centered Learning, Teaching and Evaluation)	1.2 Design and Approval of Programmes 1.3 Student-Centered Learning, Teaching, and Assessment 1.4 Student Admission, Progression, Recognition, and Certification 1.9 On-going Monitoring and Periodic Review of Programmes
Learning Resources and Academic Support Services	1.4 Student Admission, Progression, Recognition, and Certification 1.6 Learning Resources and Student Support
Teaching Staff	1.5 Teaching Staff
C. RESEARCH AND DEVELOPMENT	
Management of Research Processes and the Research Resources	Indirectly relates to ESG Part 1 but supports overall quality assurance
Research Competence Collaborations and Supports	Indirectly relates to ESG Part 1 but supports overall quality assurance
Research Performance	Indirectly relates to ESG Part 1 but supports overall quality assurance
D. SERVICE TO SOCIETY	
Management of Service to Society Processes and the Service to Society Resources	Indirectly relates to ESG Part 1 but supports overall quality assurance
Service to Society Performance	Indirectly relates to ESG Part 1 but supports overall quality assurance

Analysis

The interconnections between the standards from the ESG Part I and THEQC evaluation criteria for IEEP, IAP and IIAP are discussed below:

⁶⁹ https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation-Criteria_3.1.pdf

ESG 1.1 Policy for Quality Assurance

The ESG requirement to have a publicly available policy for quality assurance as a part of the agency's strategic management, is developed and implemented with the involvement of internal and external stakeholders, is reflected in the first heading of the national Evaluation Criteria "Leadership, Governance and Quality"⁷⁰, which consists of the list of criteria:

- "Leadership and Quality";
- "Mission and Strategic Goals";
- "Governance systems";
- "Stakeholder involvement";
- "Internationalisation".

This set of evaluation criteria requires that HEIs have a governance model enabling institutional transformation, that includes the elements of leadership and is oriented towards the development of internal quality assurance culture. This criterion also obliges HEIs to plan and review the strategic objectives, monitor and evaluate its results in order to achieve its vision, mission and goals and to present these to the public. This criterion requires having an internal management system and resources to ensure the achievements of the strategic objectives. It focuses on the necessity to cooperate with HEI's internal and external stakeholders and base the strategic approaches and processes on their feedback.

The heading C "Research and Development" is dedicated to strengthening the links between the studies and the research activities and reflects very close communication between THEQC and other Turkish bodies, responsible for the research field.

1.2 Design and approval of programmes

This standard requires HEIs to have processes for the design and approval of their programmes, so that they meet the set objectives and learning outcomes and clearly define and communicate a resulting qualification with a reference to the Turkish Qualification Framework.

This standard is covered by THEQC evaluation criteria "Program design, evaluation and update". The Turkish QA system requires explicit definition of the objectives and learning outcomes to demonstrating their compatibility with the Turkish Qualification Framework. The publicly available data about the program must reflect the HEI's mission and vision. The competencies to be acquired based on education modes (formal, blended, distance) are to be defined for different fields. Physical and technological facilities (access, social distance, etc.) are taken into account. THEQC evaluation criteria also covers the aspects of a balanced course distribution (in accordance with ECTS methodology), and requires an alignment between the courses and the learning outcomes of the program. This criterion also embeds a principle of ongoing program monitoring and development with the involvement of different stakeholders. The statistical indicators related to learning and teaching (courses offered each year, student numbers, grades, results of feedback, course diversity, lab applications, the balance of undergraduate/postgraduate programs, dropout numbers and reasons, etc.) are monitored periodically and systematically and are discussed, evaluated and compared to continue the development of quality education. There is a plan, incentive and practice for program accreditation; the accreditation strategy of the institution is stated, and its implications are discussed. The benefits of accreditation and its contribution to the internal quality assurance system are evaluated. The organisational structure to manage the implementation and the development of study programs is also one of the key requirements within the system.

⁷⁰ The same list of criteria is for IIAP with the exception of the title of the heading. Instead of „Leadership, Governance and Quality“, the I heading of IIAP evaluation criteria is called „Governance and Quality“.

1.3. Student-centred learning, teaching and assessment

This standard sets out a list of measures and guarantees that HEIs should implement these in order to stimulate to full student involvement in the learning process and to ensure a transparent and adequate assessment of students.

The concept of student-centred learning is embedded in THEQC evaluation criteria “Implementation of Programs “Student-Centered Learning, Teaching and Evaluation”.

THEQC evaluation criteria establishes a solid list of interactive learning that should be in place to ensure a positive and diverse study experience: competence-based and performance-based, interdisciplinary, integral, case/practice-based approaches that prioritize learning are adopted in all educational modalities (face-to-face, distance, blended) and the nature of these modalities are taken into account. The focus should be on deep learning, and the engagement, motivation and commitment of the students rather than the transfer of knowledge. Formal education processes are expected to be enhanced with technological opportunities and approaches such as flipped learning, project-based learning, etc., for associate, bachelor's, and postgraduate students. The involvement of students in research processes should be facilitated through the curriculum, methods and approaches. The implementation and follow-up measures of all these practices should be systematically evaluated.

THEQC evaluation criteria defines the framework for student-centred evaluation. One of the main principles of student assessment is to facilitate the self-expression of students evaluating their performance and their competences. The continuity of measurement and evaluation is provided through methods like multiple exam possibilities and assignments, projects, and portfolios, some of which are process-based (formative). Exam methods must be aligned with, and appropriate for, course objectives and education modalities (face-to-face, distance, blended) are planned and implemented. The mechanisms for exam practices and exam security are required (face-to-face/online exams, exams for disadvantaged groups). The time, rater reliability and validity of measurement and evaluation practices should be in place. The institution should constantly improve its measurement and evaluation approaches and opportunities based on the feedback of students and teaching staff. The announcement, implementation, control, alignment with objectives of these improvements and the measures taken are examined.

1.4. Student admission, progression, recognition and certification

This standard sets the requirements for HEIs to apply pre-defined and published regulations covering all phases of the student “life cycle”, e.g. student admission, progression, recognition and certification. This standard is reflected in THEQC evaluation criteria “Implementation of Programs Student-Centred Learning, Teaching and Evaluation”.

In THEQC evaluation criteria, there is a focus on the transparency and publicity of the rules for student admission. HEIs are expected to draft a consistent set of rules and implement them transparently. Document requests like diplomas, certificates and similar documents are to be tracked meticulously. Prior learning (face-to-face, public, distance/blended education, knowledge and skills obtained through informal learning) should be fairly recognized and credited. HEIs should actively provide a mobility support parallel to the internationalization policy, practices encouraging and facilitating students as well as practices preventing credit loss during mobility. Approval of qualifications, conditions for graduation, and graduation decision-making processes are expected to be defined in a clear, understandable, comprehensive, and consistent manner and are shared with the public. These standards should be also applied in the certification and issuing of the diplomas.

1.5 Teaching staff

According to ESG 1.5, HEIs should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff. This

includes transparent recruitment procedures and fair working environment as well as ongoing systematic development of the teachers' competences.

THEQC evaluation criteria "Teaching staff" covers the abovementioned ESG I.5 requirements, as they point out the importance of published and fair recruitment procedures, based on academic merit and equal opportunity. This criterion promotes the concept of a fair employment environment reflecting a balanced workload. The framework also focuses on the possibility for others (e.g. students) to reflect on teacher's performance and their principles and culture.

In order to ensure an ongoing development of teachers' competences, THEQC evaluation criteria supports a concept of planned and regularly monitored competency development processes that are based on need analyses. HEIs are also expected to foster creative / innovative education practices and competition amongst teaching staff.

1.6 Learning resources and student support

According to ESG I.6, HEIs should have appropriate funding for learning and teaching activities to ensure that adequate and readily accessible learning resources and student support are provided.

This standard is covered in THEQC evaluation criteria "Learning resources and academic support services". THEQC evaluation criteria establishes a comprehensive system of resources and support which contributes to a good higher education experience.

This system includes the requirements to be adequate and fit for purpose:

- physical resources, such as classrooms, laboratories, libraries, studios, coursebooks, online books/documents/videos, etc., infrastructure (dining hall, dormitory, technology-equipped study areas, health, transportation, IT services, infrastructure of distance education) that are suitable in quantity and quality, accessible and recognized and utilized by students learning management system that can fully fulfil learning and teaching needs, is user-friendly, ergonomic, and has synchronous, and asynchronous learning, enriched content development, and also measurement and evaluation, and in-service training opportunities;
- advisory measures, such as advisor teaching staff members who follow the academic development of students, lead them, help them solve their academic problems, and support their career planning;
- psychological counselling;
- career centres;
- access to educational opportunities of the disadvantaged, vulnerable and under-represented groups (disabled, poor, minority, immigrant, etc.), designed and implemented in accordance with the principles of equality, equity, diversity and inclusion;
- social, cultural and sporting activities.

The essence of this criteria safeguards the provision of all these elements and that they are provided in accordance with the pre-written principles, and are constantly monitored and further developed.

1.7. Information Management

This ESG standard sets out the obligation for HEIs to collect, analyse and use relevant information for the effective management of their programs and other activities.

This standard is transferred to THEQC evaluation criteria "Governance" and specifically to its sub-criteria "Performance management".

This sub-criterion obliges HEIs to have ongoing monitoring of its' performance and stresses the positive impact of an effective performance management system to enable HEIs' continuous improvement. Performance indicators that encompass all main institutional activities (general, key, distance education etc.) are to be defined and published. HEIs should be able to reflect how performance indicators are related to the internal quality assurance system, as well as demonstrate the changes over time.

1.8. Public information

This ESG standard sets out the requirement for HEIs to publish information about their activities, including programs, which is clear, accurate, objective, up-to-date and readily accessible.

This principle is embedded in THEQC evaluation criteria “Leadership and Quality”, specifically in its sub-criteria “Public disclosure and accountability”.

Public disclosure is articulated as a principle, the procedures and how to use them are expected to be designed and announced in an accessible manner, and all steps about public disclosure should be systematic.

This sub-criterion stipulates the requirements for the HEI’s website, stressing the provision of accurate, up-to-date, relevant and easily accessible information.

1.9 On-going monitoring and periodic review of programs

The ESG requires that HEIs monitor and periodically review their programs to ensure that they achieve the objectives and the needs of students and society.

This standard is incorporated into THEQC evaluation criteria framework under the criteria “Program design, evaluation and update” and is specifically addressed in sub-process “Follow-up and updating of programs”. This criterion envisages a monitoring and review of study programs as an ongoing procedure, carried out with stakeholders and supported by statistical data: courses offered each year, student numbers, grades, results of feedback, course diversity, lab applications, the balance of undergraduate/postgraduate programs, dropout numbers and reasons, etc.

1.10. Cyclical external quality assurance

Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.

This principle is embedded in published methodologies: Evaluation Programs Guide (applied for IEEP and IAP) and International Institutional Accreditation Program Guide (for IIAP) that shape cyclical external review procedures both for national and international HEIs. According to the IAP framework, depending on their performance, HEIs can be accredited for 5 years (full accreditation) or 2 years (conditional accreditation). In the case of full accreditation, there is an interim evaluation to measure the level of HEI’s progress.

After the thorough analysis of the Evaluation Criteria and the Rubric, the panel concludes that all the areas indicated in the Part I of ESG are covered by THEQC’s criteria.

The previous panel formulated this recommendation to provide more feedback to ISERs in order to improve the quality of these institutions. Since the last review, the agency has revised the ISER writing guide and has come up with changes that would clarify the application of the Rubric; however, neither the SAR, nor the agency staff have provided any evidence that the feedback from ISERs is being collected and systematically analysed.

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.

2019 review recommendation

“The panel recommends THEQC to carry out an internal review of the current evaluation process, as it is very new and will move to one of institutional accreditation; particular focus should be on follow-up and on how stakeholders – in the widest sense and not only those represented in the Council - are involved in the design of methodologies, not just in the review of criteria and processes.”

Evidence

The framework of QA activities that fall within the scope of the ESG currently contains 3 separate activities: International External Evaluation Program (IEEP), Institutional Accreditation Program (IAP) and International Institutional Accreditation Program (IIAP). Although these 3 activities are carried out within the same set of criteria, the goals and the outcomes of these procedures differ. The main objective of the IEEP is to introduce an institutional external evaluation model and a comprehensive list of evaluation criteria that are aligned with the Part I of ESG to the Turkish higher education community. The HEIs that are subjected to this type of external evaluation get the opportunity to receive the feedback from their peers regarding their strengths and the shortcomings and to initiate quality enhancement activities in their institutions. The main outcome of this procedure is an Institutional Feedback Report, that does not bring any negative consequences to the institution, but identifies areas of improvement. As this type of evaluation is relevant to HEIs that graduates their first cohort of students, there are several institutions that haven't undergone this procedure up to this day (this program will be relevant to future Turkish HEIs as well).

The completion of this procedure leads to the inclusion of HEIs in another external QA procedure – IAP. Although the HEIs are evaluated under the same framework and same criteria, the outcomes of this type of evaluation are different. The score that HEIs are awarded, determine the level of their maturity and, subsequently, the accreditation decision (full accreditation, conditional accreditation, refusal of accreditation).

The third procedure, IIAP, is designed to carry out evaluations abroad and to widen the agency's profile in the international arena.

The evaluation and accreditation costs under the IEEP and IAP are limited to covering the experts' travel, accommodation and meals' expenses, which is covered by the HEIs. The expert work is voluntary.

According to Article 3 of the Regulation on Higher Education Quality Assurance and the Turkish Higher Education Quality Council⁷¹, Turkish HEIs have to prepare annual Institutional self-assessment reports (ISERs) regardless of their participation in evaluation or accreditation procedure that year.

Participation in the IEEP and IAP procedures, including the separate follow-up procedures under IEEP and IAP, depends on the stage within the evaluation cycle: the external evaluation on the institutional level starts with the compulsory IEEP procedures, after the end of the follow-up activities (Follow-up Program), HEIs are considered as ready to enter the next level of institutional evaluation, this time by being evaluated in accordance with the IAP program. The completion of this program and its follow up activities (Mid-term Evaluation Program) leads to the formal accreditation decision.

The costs of the evaluations under the IIAP are the subject of the contract and are to be covered by the foreign HEIs.

Besides the general requirements for HEI's activities that come from the ESG framework, there are national requirements determined by the Turkish HE environment: (parts C “Research and

⁷¹https://www.yokak.gov.tr/documents/mevzuatlar/THE_REGULATION_ON_HIGHER_EDUCATION_QUALITY_ASSURANCE_AND_THE_THEQC2023.pdf

Development” and D “Service to Society” of the Evaluation Criteria). During the site visit, the THEQC’s staff explained that these requirements were set in order to develop the research activities in Turkish HEIs and to support the proper level of the 3rd mission of the Turkish HEIs.

Although the agency is relatively young and currently is under the second full ENQA review, the methodologies, the criteria and ISER writing guide⁷² have already been revised several times.

Following the insights from the 2019 review, in 2020, the agency initiated review of the criteria. The main intention of such revision was to simplify the criteria concept and to make it easier to use. This process was supported by the involvement of THEQC’s Advisors and, during a one-week session, the agency came up with an updated list of 14 criteria and 46 sub-criteria, allocated in 4 headings (instead of 5 headings, 22 criteria and 56 sub-criteria). This new concept of evaluation criteria was implemented as of 2021.

There were three main types of the amendments within the list of criteria:

- some of the criteria / sub-criteria were allocated: some were combined, others were separated (e.g. separate criteria “A. Quality Assurance System” and B “Governance System” were combined to a criteria “Leadership, governance and quality”, one sub-criteria “Mission, vision, strategic goals and objectives” was divided into separate ones: “Mission, vision and policies” and “Strategic goals and objectives”;
- some criteria / sub-criteria were added (e.g. “Institutional transformation capacity”, “Governance system” and etc.) or excluded (e.g. Research strategy“, “Service to society strategy” and etc.);
- The scope of some criteria was extended, e.g. focusing on the disadvantaged groups.

The main changes in the criteria are indicated in the table below⁷³:

v2.0	v3.0	Explanation	Change
A. Quality assurance system B. Governance system	A. Leadership, governance and quality	Two main headings were combined. In this context, the criteria under the main heading «governance system» were moved.	Combination
-	A.1.3. Institutional transformation capacity	It was added to evaluate the adaptation capacity of the institution to changes in the higher education landscape.	Addition
A.1.1. Mission, vision, strategic goals and objectives	A.2.1. Mission, vision and policies A.2.2. Strategic goals and objectives	The sub-criterion “mission, vision, strategic goals and objectives” were divided into two in the new rubric and updated as “mission, vision and policies” and “strategic goals and objectives”.	Separation

⁷² The guide for the writing of ISERs following the IEEP and IAP procedures. The ISER Writing Guide which is relevant to IAAP was established only in 2024 and has not been updated yet.

⁷³ SAR, p. 56.

-	A.3. Governance systems	Such an approach was followed in order to evaluate the management systems in the institution in a holistic manner. The sub-criteria under this criterion remained as the sub-criteria in the previous rubric document.	Addition
B.3.3. Student feedback	A.4.2. Student feedback	The relevant sub-criterion was moved under the	Relocation
		stakeholder involvement criterion.	
B.6.2. Alumni tracking system	A.4.3. Alumni relations management	The relevant sub-criterion was renamed and moved under the stakeholder involvement criterion.	Relocation
B.1. Design and Approval of Programs B.6. Follow-up and Updating of Programs	B.1. Program Design, Evaluation and Update	The two criteria were combined.	Combination
-	B.1.6. Management of learning and teaching processes	Management of learning and teaching processes were added as a new sub-criterion.	Addition
B.2. Student admission and progression B.3. Student-centered learning, teaching and evaluation	B.2. Execution of Programmes (Student-Centred Learning, Teaching and Evaluation)	The two criteria were combined.	Combination
B.3.4. Academic advising B.5.5. Psychological counseling and career services	B.3.2. Academic support services	The two sub-criteria were combined into a single sub-criterion.	Combination
B.5.4. Accessible university	B.3.4. Disadvantaged groups	The scope of the sub-criterion was extended.	Scope extension
C.1. Research Strategy	-	Although this criterion was excluded, it is evaluated together with all policies under the mission and strategic objectives criterion.	Exclusion
C.1.2. Management of the research and development processes and its organizational structure	C.1. Management of Research Processes and the Research Resources	A new criterion was created by combining the two sub-criteria.	Addition

C.2.1. Research resources			
D.1. Service to Society Strategy	-	Although this criterion was excluded, it is evaluated together with all policies under the mission and strategic objectives criterion.	Exclusion
D.1.2. The management and organizational structure of service to society processes	D.1. Management of Service to Society Processes and the Service to Society Resources	A new criterion was created by combining the two sub-criteria.	Addition
D.2.1. Resources			

Since its initial review in 2019, THEQC's methodologies have been developed and updated several times, e.g.:

- Introduction of the Rubric (2020). The Turkish QA concept is based on the concept of evaluation criteria and sub-criteria. The level of HEI's compliance with this set of criteria and sub-criteria is measured in accordance with the Plan-Do-Check-Act (PDCA) concept, assessing the maturity level (the scale from 1 to 5) of each sub-criterion. In order to link the evaluation criteria and sub-criteria with the HEI's maturity levels of the Plan-Do-Check-Act (PDCA) concept, THEQC has established a methodological tool - the Rubric - which links the evaluation criteria and sub-criteria with concrete maturity levels. After its introduction in 2020, this tool was amended in 2022, indicating the samples of the evidence that could signal a certain level of HEI's compliance;
- Introduction of IAP (2020)⁷⁴;
- Introduction and development of follow-up procedures (2020). Following the ENQA recommendation to develop the follow-up concept, THEQC has established a monitoring system, dedicated to evaluating the improvement process in relevant HEIs in the aftermath of the IEEP evaluation. This external expert evaluation procedure was reviewed and renamed as a follow-up procedure in 2021 and a separate follow-up procedure was established for the IAP program in 2023. These updates led to more detailed description of the follow-up activities, the roles of the participants and the outcomes of these procedures. The Mid-term Evaluation Program which is a follow-up stage after the IAP evaluation not only evaluates the HEI's progress implementing the recommendations of the external experts' teams, but is a means of reviewing the accreditation decision. A detailed description of the outcomes of the Mid-term Evaluation Program is provided under the ESG standard 2.3;
- Relevance between the THEQC evaluation criteria and the ESG (2023);
- Introduction of IIAP (2024)⁷⁵ and etc.
- Development of the ISER writing guide. According to SAR, the main reason that has driven the renewal of this document was that the quite general explanations under criteria created difficulties in assigning maturity levels for sub-criteria. This initiative came from HEIs and led to the following changes in the Guide: the latest version of the Guide provides explanations and evidence under each sub-criteria specifying the level of maturity as well.

The development of the methodologies throughout the year is available on the agency's website⁷⁶.

According to the SAR, the agency is in continual dialogue with HEIs. The agency organises meetings with communities of HEIs (including rectors, vice-rectors, Quality Commissions) and separate

⁷⁴ The concept of IAP is analysed under ESG 2.3 and 2.5

⁷⁵ The concept of IIAP is analysed under 2.3 and 2.5

⁷⁶ <https://www.yokak.gov.tr/en/documents-of-national-evaluation-programs/>

meetings with the external experts and leaders of expert teams before and after every evaluation period. During these meetings, the agency can collect feedback and use it for future development.

THEQC views the expert training sessions as another source of information from the stakeholders that could be useful in the development of methodologies and procedures.

According to the SAR, stakeholder involvement is central to the agency. The agency has developed a feedback mechanism as a means of ensuring that the voice of stakeholders is heard. After the completion of every evaluation (accreditation) procedure, both experts and the representatives of HEI share their experience by completing the surveys and participating in online focus group meetings, where both experts and the representatives of HEIs present their insights not only on how the evaluation was carried out, but also reflecting on the methodologies as well. The feedback collected from HEIs and the experts is analysed and used to update and improve THEQC's processes and methodologies.

In order to develop stakeholder involvement in updating THEQC's methodologies, the agency introduced internal sub-process "Methodology Development and Updates Sub-process". This method defines the sub-steps of getting stakeholder involvement, starting from the design phase. This process was put into practice when the agency started designing the IIAP methodology. During the design phase, the agency analysed international practices, held meetings with the representatives from foreign HEIs to identify their needs and consulted with the Advisors.

During the site visit, the participants expressed their general satisfaction with the methodologies. The representatives of CoHE, Presidential Council and MoNE could not identify any discrepancies between the strategic views of the Turkish Government and the course set by the agency's methodologies.

Although the results of the first cycle of the IAP program's implementation to now (out of 74 institutions that have undergone the IAP program, the majority, i.e. 51, were granted conditional accreditation (one institution was refused accreditation)), this demonstrates that the majority of universities that have undergone the program have not fully met the expectations embedded in methodologies and criteria as yet, although their feedback is very positive. According to these HEIs, the conditional accreditation decision was a robust stimulus to enhance quality in their institutions and set the goals to meet the criteria fully during the next IAP cycle.

Analysis

The panel has analysed the workload and costs that are placed on HEIs. In the panel's view, the HEIs have a stable workload to conduct annual self-evaluation sessions and prepare ISERs; however, in different phases of the evaluation and accreditation cycle, the involvement in different procedures (including separate follow-up procedures) might create a heavy workload. The financing model does not create a significant burden for HEIs.

The panel appreciates the agency's efforts to adapt their methodologies according to the changing Turkish HE environment, legal requirements and stakeholder feedback. The collected evidence demonstrates the transparency and complexity of the design and revision of the methodologies.

How their methodologies fit the needs of the Turkish HE environment and how they reflect the development of a quality culture, was explored when the agency was preparing the Strategic Plan⁷⁷. To collect this feedback, the agency carried out a survey, asking the participants about their expectations of the agency in the upcoming 5-year period. The results of this survey demonstrated,

⁷⁷ https://www.yokak.gov.tr/documents/site-stratejikplan/EN_Yokak_2024_2028_Stratejik_Plan.pdf

that only 1.53 percent of the targeted audience expect the agency to improve the criteria and corresponding methodologies. In comparison, 39.8 percent of responses indicated the need to improve the actual provision of services and strengthen expert training and guidance. In the panel's view, this indicates stakeholder satisfaction with the fitness of the methodologies.

An example of when the ISER guide was changed after some incoherence was identified by the HEIs, is very positive and reflects the recommendation provided by the previous review in 2019. However, as the panel has analysed under the ESG 3.1, the involvement of a wider circle of different stakeholders, especially the ones that are currently under-represented within the agency (e.g., labour market, business, professional sectors, non-governmental organisations etc.) would enrich the agency's perspective and experiences and could introduce new ideas. The panel noted that the establishment of the comprehensive follow-up procedures implements the ENQA 2019 review recommendation.

The general impression from the meetings with the stakeholders leads to the conclusion that the current state of methodologies addresses the maturity of the Turkish HE system and invites institutions to improve their systems. The panel noted the very low number of appeals⁷⁸.

In the panel's view, the QA framework is logically designed. At first, it introduces the requirements and the criteria for the IEEP program and only then concludes the level of compliance with the IAP and accreditation decision. The IAP, alongside with national programs, provides the prerequisites for improvement in the field of international education.

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

2019 review recommendations

"The panel recommends THEQC to further develop clearly defined follow-up activities after Institutional external evaluation.

THEQC should reconsider the organization of site visits to avoid the implications of conflicts of interest raised by HEIs providing travel, accommodation and meals for the evaluation team; this has the potential to affect the independence and integrity of the process and may become even more relevant with the implementation of institutional accreditation in the near future."

Evidence

The external quality assurance activities within the scope of the ESG are carried out in accordance with the written and published methodologies:

⁷⁸ The detailed information is provided in the Evidence section of the ESG standard 2.7.

- Institutional External Evaluation Program and Institutional Accreditation Program are described in the THEQC Evaluation Programs Guide⁷⁹;
- International Institutional Accreditation Program is described in the THEQC International Institutional Accreditation Program Guide⁸⁰.

Both guides have been adopted by the Council of THEQC and published on the agency's website in Turkish and English. Since the last review, these methodologies have been updated several times. All the versions are available online⁸¹.

According to the SAR, HEIs that have had a first cohort of graduates are eligible for the IEEP procedure. In the Turkish HE system, participation in this procedure is compulsory. The inclusion in the IAP procedure, however, is considered by the Council of THEQC after the HEI's declaration of intention is received. It is important to note, that only those HEIs which have successfully undergone the IEEP procedure (including the Follow-Up procedure), are eligible for the IAP. If the Council selects an institution for IAP that year, this institution then signs the agreement with THEQC. The draft of the agreement is provided in Annex 7 of the THEQC Evaluation Programs Guide. However, if an HEI does not request an IAP within 5 years following the successful completion of an IEEP program, then these HEIs are compulsorily included in the IAP program by THEQC.

The evaluation activities, that are included in an annual plan are distributed according to the following timetable (The THEQC Evaluation Programs Guide p. 8):

Spring Term Calendar:

Date	Explanation
January-February	Institutions to be evaluated are selected
January-March	Institutions write their Institutional Self-Evaluation Reports
March - April	Evaluator Training
April - May	Site visits are performed
June - July	<ul style="list-style-type: none"> • Institutional Feedback Reports are published as a part of the Institutional External Evaluation Program • Institutional Accreditation Reports and the accreditation decisions are published in the scope of the Institutional Accreditation Program

Fall Term Calendar:

Date	Explanation
January-February	Institutions to be evaluated are selected
January-March	Institutions write their Institutional Self-Evaluation Reports
September	Evaluator Training
October - November	Site visits are performed
December - January	<ul style="list-style-type: none"> • Institutional Feedback Reports are published as a part of the Institutional External Evaluation Program • Institutional Accreditation Reports and the accreditation decisions are published in the scope of the Institutional Accreditation Program

According to the SAR, HEIs that have not applied to the IAP within five years following the IEEP are compulsorily included in the IAP by THEQC.

⁷⁹ The version up-to-date is available at: [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20(1).pdf)

⁸⁰ The version up-to-date is available at: https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

⁸¹ <https://www.yokak.gov.tr/en/documents-of-national-evaluation-programs/>

The IIAP, which at the time of this review had not been put into practice yet, is to be implemented after the applications from foreign HEIs have been received. As a first step, the agency will assign a coordinator who is responsible for the screening of the application documents. After completion of this preliminary review, the documents are then presented to the Council which considers the inclusion of the applying institution in the IIAP. The last step is to sign the IIAP agreement (THEQC International Institutional Accreditation Program Guide p. 18).

The elements embedded in ESG 2.3 standard are reflected in IEEP, IAP and IIAP procedures to the following extent:

Self-assessment or equivalent

In Türkiye, HEIs perform self-assessment procedures and prepare a report on this, annually⁸², regardless of HEI's participation in THEQC's external quality assurance procedures that year. These annual ISER reports are considered as part of the IEEP and IAP procedures when they take place

The self-assessment procedure should be performed in accordance with the requirements set by the agency and embedded in the ISER Writing Guide⁸³. If a foreign HEI is participating in IIAP, there is a separate ISER Writing Guide⁸⁴, specific to the IIAP and the international context. ISER is a crucial source of information for the external expert panels as well as for society at large.

Site visit

According to THEQC's methodologies, all procedures (IEEP, IAP and IIAP) contain a site visit as one of the key steps in the evaluation procedure, dedicated to the collection of evidence. These methodologies provide a comprehensive description of the timeline and the duties of the external expert teams and HEIs representatives in regard to the site visit.

According to the THEQC Evaluation Programs Guide (p. 12-23), key parts of every IEEP and IAP evaluation are the preparation for the site visit followed by the actual visit to the HEI. During preparation for the site visit, the team organises pre-site visit meetings (usually online). The preparation stage has the purpose of establishing the dates and the final program for the site visit, settling the accommodation and travel issues with the HEI representatives⁸⁵, requesting any additional documentation (if needed), preparing the questions for the site visit etc. Site visits, depending on the size of the institution, usually last 3 days. During this period, the external evaluation team carries out interviews with different groups: representatives of HEIs and stakeholders (including for example, students, teaching staff, labour market representatives).

The very same principles regarding the preparation and implementation of the site visit are laid out in the International Institutional Accreditation Program Guide (p. 22-32). In the case of IIAP, the site visit usually lasts for 4 days. During this process, the review coordinator, an appointed THEQC's staff member, participates in every meeting.

⁸² ISER Writing Guide p. 2 https://www.yokak.gov.tr/documents/national-doc/EN-KIDR_Haz%C4%B1rlama_K%C4%B1lavuzu_3.2.pdf

⁸³ The version up-to-date, that is relevant to IEEP and IAP procedures is available at: https://www.yokak.gov.tr/documents/national-doc/EN-KIDR_Haz%C4%B1rlama_K%C4%B1lavuzu_3.2.pdf

⁸⁴ [https://www.yokak.gov.tr/documents/international-doc/IIAP_ISER_WRITING_GUIDE_v.1.0a%20\(1\).pdf](https://www.yokak.gov.tr/documents/international-doc/IIAP_ISER_WRITING_GUIDE_v.1.0a%20(1).pdf)

⁸⁵ According to section B7, all costs of evaluation (the external expert team's travel, accommodation and meals) are covered by the HEI that undergoes the evaluation

Report resulting from the external assessment

All 3 evaluation procedures, IEEP, IAP and IIAP, culminate in a report, prepared by the team of external experts, consolidating the findings of the experts' teams and their judgements under the criteria and according to the Rubrics⁸⁶ adopted by THEQC.

The Evaluation Programs Guide and International Institutional Accreditation Program Guide set out the main quality points of report writing: accuracy, impartiality, an evidence-based approach, format, style and grammar. This is applicable for the reports across all 3 procedures: IEEP, IAP and IIAP.

When the HEI undergoes the evaluation procedure according to the IEEP programme, an Institutional Feedback Report is issued. However, the completion of the IAP procedure has different outcomes: an Institutional Accreditation Report and the accreditation decision (Evaluation Programs Guide p. 24, 25). These reports are drafted by the external experts within 21 days of the site visit and then sent to HEIs for feedback. The scope of the feedback covers the areas for improvement and the correction of any mistakes and factual errors, if any (Evaluation Programs guide p. 24). After receiving the response to their draft, the external expert team considers if any changes to the report are needed and the report is finalised accordingly.

In case of the IIAP the only difference is one additional step: the report screening by the evaluation coordinator appointed from THEQC's staff (International Institutional Accreditation Program Guide p. 34).

An additional measure to enhance the quality of the reports is a consistency check, performed by the permanent Commission on Institutional External Evaluation and Accreditation (Evaluation Programs Guide p. 25; International Institutional Accreditation Program Guide p. 35). The reports then are authorised by the Council of THEQC and finally, published on the website.

Consistent follow-up

According to the Evaluation Programmes Guide, there are two compulsory follow-up activities:

- Follow-up program. This program is relevant to HEIs that have undergone the IEEP procedure; THEQC includes HEIs in this procedure in the second year at the earliest. The objective of this program is to evaluate the development process within HEIs with the focus on the areas that were flagged as "areas for improvement". This program is implemented by the panel which consists of at least 2 external experts, one of them selected from among the previously commissioned team leaders and the other (s) from the evaluators' pool. The process of these follow-up activities includes document analysis (via ISERs and Institutional Feedback Report (IFR) site-visit and the preparation and the publication of the Follow-up report (which is subject to HEI feedback). The follow-up report includes evaluations on the following issues: (1) Improvement practices carried out in the institution regarding the areas for improvement specified in the IFR; (2) If there are no improvement practices regarding areas for improvement, the reasons why nothing has taken place in relation to any one recommendation; (3) Whether the sustainability of the strengths in the IFR is possible, and finally, evaluations carried out by the follow-up team, excepting the matters included in the IFR.
- Mid-term Evaluation Program. This program is applied in accordance with the IAP. HEIs that have undergone the IAP evaluation with the final outcome of full or conditional accreditation are included in this program in the second year following the year the accreditation decision was issued. The outcomes of this type of follow-up are very different and might result in the continuation of full accreditation, the revocation of full accreditation, the upgrade of conditional accreditation to full accreditation or the revocation of conditional accreditation. The aim of the Mid-term Evaluation

⁸⁶ The Rubric is a methodological tool that aligns the evaluation criteria with the maturity levels of Plan-Do-Check-Act (PDCA) approach and provides practical evidence that prove the certain levels of maturity from 1 (lowest) to 5 (the highest). The concept of Rubric is presented under ESG 2.2.

Program is to evaluate whether the institution has made any improvements since the previous IAP evaluation. This type of follow-up is carried out by a team of at least 4 external experts. One of them is selected from among the previously commissioned team leaders and the others from the evaluator's pool. This procedure includes document analysis (post-IAP ISERs, IAR and Accreditation Decision letter etc.) site visit and the preparation of a Mid-term Evaluation Report (which is subject to HEI feedback). After the Council approves the report, it is published and the decision regarding the accreditation is issued.

- According to the International Institutional Accreditation Program Guide, the follow-up procedures refer to the HEIs that end with the grant of accreditation after the evaluation under the IIAP program. Such HEIs will be included in a follow-up procedure in the second year, following the IIAP accreditation decision. The scope of this follow-up procedure consists of "the areas for improvement". It is carried out by the follow-up team which consists of at least three experts. At least two of them should come from the team involved in the previous evaluation. This procedure includes document analysis (including specifically prepared ISER), an online site visit and the preparation of a follow-up report. After the Council approves the report, it is published.

Most of the steps, including writing of ISERs, preparation and submission of the reports, and feedback collection, is performed using QAMIS.

Analysis

The evidence that the panel has collected demonstrates that the agency has developed a comprehensive model for the implementation of QA activities, that has all of the features listed in ESG 2.3.

In the panel's view, the agency methodologies for IEEP, IAP and IIAP are detailed, and also accessible. This is very important for IEEP and IAP procedures as the evaluation coordinators from the agency's staff are not involved in the work of the panels. These guides, alongside the ISER writing guides are highly appreciated by the representatives of HEIs, as well as the external experts.

The clarity and the usefulness of the procedures was confirmed by the participants of the site visit, especially by the HEIs' representatives and the external experts. All of the methodologies are easily accessible on the agency. The panel noted that not only the last versions of the methodologies are published, but the previous ones are available as well. The panel finds this approach very useful as everyone can read and trace the development of the methodologies.

A very positive approach that the agency has developed is the consistency check performed by the internal Commission on Institutional External Evaluation and Accreditation. The interview with the members of this Commission demonstrated their professionalism to in reading and analysing each report written by the external evaluation panels. A more detailed analysis of the consistency check is provided under ESG 2.5.

Since the last ENQA review, the agency has invested in the development of follow-up procedures and has fully implemented the related recommendation from the ENQA 2019 review.

During the interview with the representatives of HEIs, the panel was informed that additional documentation requested but not provided by the end of site visit, is still allowed to be submitted while responding to the draft of the report. The rationale behind this practice was given as due to lack of time. In the panel's opinion, such practice is not to be recommended as missing key documents may lead to the external experts not having a full picture of the HEI. This in turn may lead to misunderstandings when preparing for the site visit, when taking part in the site visit and when drawing their conclusions for the draft report. Therefore, it is recommended that all documents must have been submitted by the end of the site visit and no later. This would have the positive impact of ensuring the validity of the experts' judgement and the transparency of QA activities.

As mentioned previously in this report under ESG 3.3, the panel is concerned that despite the agency being recommended in the 2019 ENQA review to reconsider the practice of requiring HEIs to cover panel expenses, this practice is still continuing. As highlighted in 2019, the concern is that there is potential for HEIs to have an undermining influence on the expert panel's judgements and decisions.

In addition, bearing in mind that the methodologies have been significantly developed since 2019 on several occasions, the agency have had opportunities to initiate the above recommendation.

Panel commendation 3

The panel commends the progress the agency has made regarding follow-up procedures.

Panel recommendation 6

The panel recommends reconsidering the deadline by which HEIs can submit documentation, and that the new deadline is no later than the end of the actual site visit.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2019 review recommendations

“The panel recommends that THEQC reconsider the voluntary nature of the work of evaluators (and others) who work for THEQC and that it considers the implications of such a situation in relation to the agency’s operational independence.

The panel recommends THEQC to recruit experts from outside [Türkiye], in particular for its external evaluation panels, as well as continuing with current plans for including representatives from the business sector in the evaluation panels.”

Evidence

The Evaluation Programs Guide that describes the processes of the IEEP and IAP as well as the International Institutional Accreditation Program Guide which describes the process of the IIAP embed the principle that all the QA activities that fall within the scope of the ESG are performed by the external experts’ teams.

According to the Evaluation Programs Guide, the teams involved in IEEP and IAP procedures may include academic personnel, administrative staff, students, employers’ / sector representatives and international experts.

The Article 6 of the Institutional External Evaluation Directive of the Higher Education Quality Council of Türkiye ⁸⁷ indicates that the expert teams shall be assigned in accordance with the structure and size of the institution. Such a team should be formed in consideration of gender, geographical distribution and the results of the examinations provided within the training framework.

⁸⁷ https://www.yokak.gov.tr/documents/mevzuatlar/Kgbr_Yonerge_Guncel_Ing.pdf

The teams consist of a team leader and the evaluators (other members of the panel). According to the SAR, the team leader, selected from experienced experts, leads on various technical issues (such as the allocation of tasks, setting the date for the site visit, preparation of the site visit program, leading the interviews, negotiating other practicalities and etc.) and is generally responsible for the quality of the outcomes.

The main eligibility requirement for inclusion in the pool of experts (except the students) is a minimum 10 years of experience in higher education and research activities or administrative processes. Applicants who have experience in national and/or international external evaluation and/or accreditation processes are preferred (Article 5 of Institutional External Evaluation Directive). Every expert must undergo compulsory training which culminates with an examination. If successful, the applicant is included in the expert pool.

In addition to this, there are two more requirements for the experts participating in the IIAP program: at least 3-years work experience in the field of higher education quality assurance and a high level of competences in the language used for evaluation⁸⁸ (International Institutional Accreditation Program Guide p. 14). The IIAP program does not currently directly require the agency to include experts with background knowledge of the higher education system and context where the review will take place.

The Commission on Institutional External Evaluation and Accreditation proposes to allocate certain experts to certain tasks; however, the final decision rests in the hands of the Council of THEQC.

The requirements for student experts are different. According to the SAR (p. 68), before being accepted for training as an external expert, the students must undergo the agency's internal training program with the purpose of preparing the students for future participation in different evaluation and accreditation procedures (Quality Ambassador Training Program (QAP)). During this program, students receive training on the different evaluation procedures. After the completion of this training, the students are required to pass the competency exam. The next step is taking part in a more detailed training program for students (Quality Ambassador Workshop). If the student successfully completes this training, students can join other external experts in evaluator training. The student experts are selected by the Student Commission in accordance with Turkish Higher Education Quality Council Student member and Students Directive⁸⁹. Selected students are proposed to the Commission on Institutional External Evaluation and Accreditation and those appointed by the Council, become the members of the panels.

The evaluation teams at THEQC are composed of academics, students, including administrative staff, and if possible, employers/sector representatives, and international experts.

The teams are usually composed of 7-8 experts. Every expert signs the Statement of Confidentiality and Code of Ethics. The issues of the possible conflicts of interests are explored in each case. The external expert teams consist of the team leader and other external experts. The IIEP and IAP procedures are not supported by the so-called evaluation coordinator (member of THEQC staff). In 2023, the agency established the position of the observers⁹⁰, but this role is designed to contribute to the consistency of the process rather than helping the panel with technical support (such as organising site visit, setting the dates, preparing schedules etc.).

The IIAP, on the other hand, has an evaluation coordinator assigned to it. According to the SAR, the inspiration for this came from ENQA's agency review procedures, and this position is designed to

⁸⁸ According to SAR, the language of evaluation could be English or Turkish.

⁸⁹ https://www.yokak.gov.tr/documents/mevzuatlar/EN-OK_YONERGESI_26_EKIM_2022.pdf

⁹⁰ <https://www.yokak.gov.tr/documents/mevzuatlar/ProceduresandPrinciplesRegardingTheDutiesandResponsibilitiesofObserversinEvaluationsPrograms.pdf>

support the work of the panel, i.e, takes over the technical workload from the leader of the expert team and ensures the sound provision of the IIAP program.

During the site visit, the HEI representatives, the experts and the THEQC staff members confirmed that, after the external expert team is formed, the HEI can respond to the proposed composition of the expert team and request changes as long as there is a rationale for these. If the request is accepted, the expert is changed in accordance with the Order of the President of the agency.

As it was stated in the SAR and confirmed by various participants of the site visit and supported by the evidence provided in other sources, such as the Status Reports⁹¹, a student member is appointed to every team. Other members of the external expert teams are appointed reflecting the profile of the HEI.

During interviews with the staff responsible for evaluation procedures, the panel became aware that although the Evaluation Programs Guide and the International Institutional Accreditation Program Guide do not explicitly require the participation of the student experts in the follow-up panels, students are always nominated.

During the site visit, the members of the expert pool (including the students) said that the training program is very useful and detailed, especially the parts when they perform case study analysis. One interviewee indicated that the competences gained in training activities have contributed to the enhancement of a quality culture within their institution. However, the feedback analysed in the preparatory stage of the Strategic Plan and later presented in this plan⁹² (p. 25) indicates that 50.74 percent of the respondents have reported that training activities need improvement. Most of the complaints were regarding the regularity and the duration of the training.

There are open calls annually; a pool of experts is formed for the upcoming evaluation and accreditation procedures that will take place that year.

During the site visit, all of the experts confirmed that all team's members (including the student representative) have equal rights and their unique competences and perspectives were treated with equal respect. The work of the experts is voluntary, with only their travel, accommodation and meal expenses covered by the HEI undergoing the site visit.

According to the SAR, the majority of evaluation and accreditation procedures are performed by national experts. There are very few cases when experts from the USA, Lebanon, Georgia and Pakistan were involved in evaluations. However, these experiences were not always positive. The staff members and the members of the expert pool during the site visit identified the language barrier as the main obstacle to inviting more international experts. However, the wider inclusion of international experts has been identified by the agency as one of their priorities for the future.

Analysis

The panel has noted the complexity of the requirements to become a member of the teams of the experts. As participation in external evaluations is voluntary and experts do not gain any financial benefits, the panel finds the dedication of experts and their important contribution in the enhancement of the Turkish higher education quality very impressive. However, over time this approach could become an obstacle to attracting experts to participate in evaluation and accreditation activities. Initiating discussion with responsible bodies and other stakeholders to explore possible ways to remunerate experts' work would be beneficial. The panel would like to emphasise that the same

⁹¹ https://www.yokak.gov.tr/documents/StatusReports/StatusReport_2022.pdf

⁹² https://www.yokak.gov.tr/documents/site-stratejikplan/EN_Yokak_2024_2028_Stratejik_Plan.pdf

recommendation was already made in the previous ENQA review in 2019. Despite this, it is not clear why this recommendation has not been implemented.

The panel has read the documents that detail the principles regarding the composition of external expert teams. The panel notes that in The Evaluation Programs Guide and Institutional External Evaluation Directive of the Higher Education Quality Council, the regulations regarding the student participation are quite vague and do not reflect the much more “straightforward” concept of compulsory student participation in expert teams that is implemented in practice⁹³. In order to enhance the quality of the methodologies, the panel considers that the corresponding changes in the Evaluation Programs Guide and Institutional External Evaluation Directive would positively affect the clarity and the integrity of the methodologies.

The panel witnessed that the representatives of the labour market are not included into every external expert team, only when it is possible. As the panel has indicated under ESG 3.1, strengthening cooperation with the labour market representatives would widen the circle of active and dedicated representatives of the employers and professional networks that could be involved in external evaluations more frequently.

The panel has investigated the workload balance within the external experts’ panels and noted that the leader of the team is expected to perform various preparatory duties of a technical nature.

In the panel’s view, the establishment of the evaluation coordinator position within the IIAP procedure, could be a great opportunity for the agency to investigate the impact this position makes to the efficiency of the teams’ work. In the event of a positive impact, a recommendation is to consider introducing this practice into the IEEP and IAP. After sessions with various audiences, the panel has gained an impression that the agency is lacking motivation to strengthen the involvement of international experts, possibly due to the difficulties encountered in the past. The agency named the language barrier as the main obstacle to more active involvement of international experts, indicating that in the past, performing evaluations in Turkish was very difficult for non-Turkish speakers coming from abroad. The agency does not appear to have explored the possibility of gradually shifting from Turkish language to English as the lingua franca for the evaluation and accreditation procedures.

Inclusion of international experts could enrich the agency and HEIs with a broader scope of experiences, practices and views that would strengthen the enhancement of the Turkish HE system. Considering internationalisation is one of the top priorities of the agency, this is strongly supported by the Advisors. It should be noted that this issue was flagged as a problematic aspect by the panel in the 2019 review.

The panel suggests that the agency could explore different scenarios as a starting point (e.g. invite foreign experts that are currently based in Türkiye (including the foreign students), to cooperate with them).

The panel understands that inviting experts that are not Turkish and work outside Türkiye would require additional funding; however, the agency could explore temporary solutions, e.g. starting with peers from different countries and educational systems currently are based in Türkiye.

In the panel’s opinion, before implementation of the IIAP program commences, the agency should consider changing the IIAP guide, mandatorily including experts who have knowledge of the legal requirements of the country where the evaluation will take place. In the panel’s view, this is crucial as it will ensure that the agency, operating outside its jurisdiction, is aware of such requirements and can ensure they are considered when formulating the quality outcomes of the evaluation.

⁹³ This is also relevant to the follow-up procedures.

Panel commendation 4

The panel commends the dedication of the external experts that perform their expert duties voluntarily.

Panel recommendation 7

The panel recommends initiating discussion with responsible bodies and other stakeholders to explore ways of remunerating experts for their work.

Panel recommendation 8

Although students are currently present in every expert team, to positively affect the clarity and the integrity of the methodologies, the panel recommends ensuring that the compulsory student participation is made explicit in the Evaluation Programs Guide and Institutional External Evaluation Directive.

Panel recommendation 9

The panel recommends to amend the International Institutional Accreditation Program guide ensuring the mandatory participation of the experts with knowledge of the higher education system of the country where the cross-border evaluation will take place in every expert team.

Panel suggestion for further improvement 6

The panel suggests evaluating the impact of the evaluation coordinator on the efficiency of the evaluation and accreditation procedures and, if positive, to consider establishing this position for the IEEP and IAP as well.

Panel suggestions for further improvement 7

The panel suggests strengthening THEQC's internationalisation by involving experts that come from different countries and educational systems in the agency's external QA activities and consider using English as the language of evaluation more frequently.

In order to achieve the regular involvement of international experts, the panel suggests considering using English as the language of evaluation more frequently.

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.

2019 review recommendation

"The panel recommends THEQC to put in place mechanisms for ensuring the consistency of judgements within external review panels."

2023 EQAR conclusion:

“The Register Committee took note of the improvements made by the agency, but could not verify, without a panel’s input, whether the consistency in the decision making is provided in full in the new procedure (i.e. the IEP). Following the new developments, the Register Committee found that the agency is partially compliant with the standards and noted that the next review should also evaluate the consistency of the application of IAP criteria in the reports.”

Evidence

The evaluation and accreditation criteria for the 3 procedures within the scope of the ESG, i.e. IEEP, IAP and IIAP is defined in the following documents of the agency: Evaluation Program Guide⁹⁴, International Institutional Accreditation Program Guide⁹⁵, Institutional External Evaluation and Accreditation Criteria⁹⁶, International Institutional Accreditation Criteria⁹⁷.

For IEEP and IAP evaluation and accreditation procedures and their follow-up activities there are 4 main headings, 14 criteria and 46 sub-criteria⁹⁸.

Main Headings	Criteria	Descriptions
Leadership, Governance and Quality ⁹⁸	Leadership and Quality ⁹⁷	Evaluates the institution's governance model, leadership approaches, and internal quality assurance mechanisms.
	Mission and Strategic Goals	Assesses the institution's ability to plan, implement, and evaluate its strategic goals.
	Governance Systems	Focuses on the management of processes and resources to achieve strategic objectives.
	Stakeholder Involvement	Examines the systems in place to receive and respond to stakeholder feedback.
	Internationalization	Evaluates the institution's internationalization strategies and objectives.

⁹⁴ [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evalation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evalation_Program-guide_3.1.1%20(1).pdf)

⁹⁵ https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

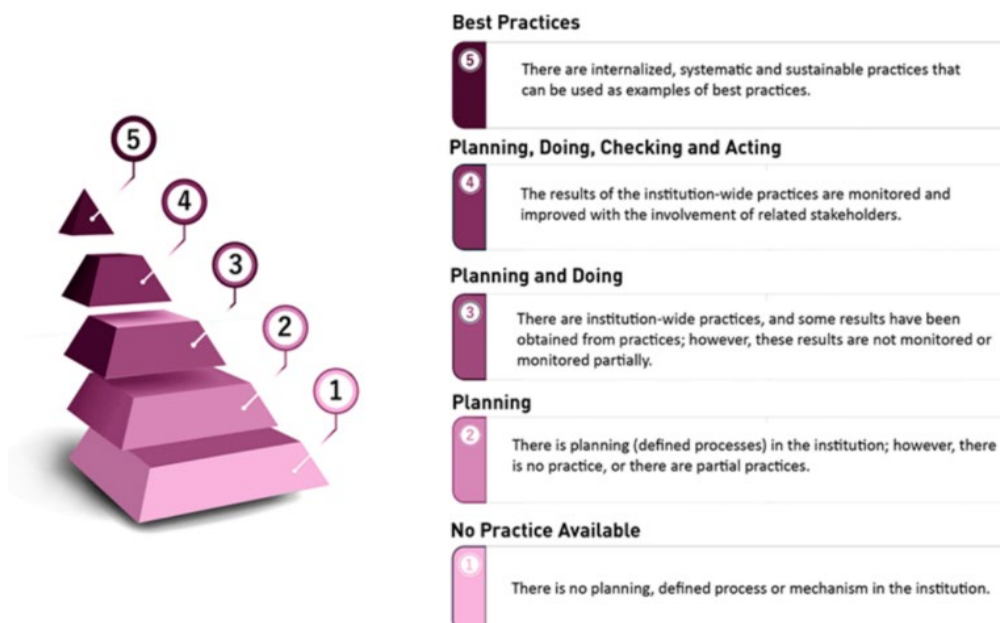
⁹⁶ https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation-Criteria_3.1.pdf

⁹⁷ https://www.yokak.gov.tr/documents/international-doc/EN_UKAP_DEGERLENDIRME_OLCUTLERI_v.1.0a.pdf

⁹⁸ SAR p. 70

Learning and Teaching	Program Design, Evaluation, and Update	Assesses the design, evaluation, and periodic updating of teaching programs.
	Implementation of Programs (Student-Centered Learning, Teaching and Evaluation)	Focuses on student-centered and competency-based teaching methods.
	Learning Resources and Academic Support Services	Evaluates the availability and accessibility of learning resources and support services.
	Teaching Staff	Assesses the recruitment, promotion, and development processes for teaching staff.
Research and Development	Management of Research Processes and Resources	Evaluates the alignment of research activities with strategic priorities.
	Research Competence, Collaborations, and Supports	Assesses opportunities for developing research competence and collaborations.
	Research Performance	Measures and evaluates the institution's research activities and outcomes.
Service to Society	Management of Service to Society Processes and the Service to Society Resources	Evaluates the management and resources allocated to societal engagement activities.
	Service to Society Performance	Assesses the institution's performance in societal engagement and its continuous improvement mechanisms.

The evaluation and accreditation criteria and sub-criteria are listed on the agency's website⁹⁹. The agency measures HEIs' maturity of Planning-Doing-Checking-Acting (PDCA) in regard of every sub-criterion with the scale from 1 to 5¹⁰⁰:



⁹⁹ https://www.yokak.gov.tr/documents/national-doc/THEOC-Evaluation-Criteria_3.1.pdf

¹⁰⁰ SAR p. 70

In order to reach a common understanding of each sub-criteria and to objectively measure HEIs' maturity levels, THEQC has established a Rubric. This methodological tool not only links criteria and sub-criteria with the maturity level of PDCA elements, but adapts the maturity level concept in regard to every sub-criterion, providing samples of evidence as well¹⁰¹, e.g.:

A. LEADERSHIP, GOVERNANCE AND QUALITY					
A.3. Governance Systems					
The institution should have a system to manage financial, human and information resources and processes to ensure the achievement of its strategic objectives in qualitative and quantitative manners.					
	1	2	3	4	5
<p>A.3.1. Information management system</p> <p>Data on important activities and processes of the institution are collected, analysed, reported and used for strategic management. The Information Management System used by academic and administrative departments is integrated and feeds the quality management processes. The security, confidentiality and reliability of the Information Management System are provided.</p>	The institution does not have an information management system.	The institution has information management systems to support the acquisition, storage, usage, processing and evaluation of institutional information.	The institution maintains an integrated information management system that supports the primary processes (learning and teaching, research and development, service to society, quality assurance).	The institution monitors and improves the integrated information management system.	There are internalized, systematic and sustainable practices that can be used as examples of best practices.
<p>Sample Evidence</p> <ul style="list-style-type: none"> • The information management system and its functions • Defined processes for acquiring, saving, updating, processing, evaluating and sharing information • Evidence for the follow-up and improvement of the Information Management System • Processes and practices ensuring information security and reliability • Evidence concerning the specific approaches and practices developed by the institution in line with the institutional needs along with standard practices and legislation 					

During the interviews, all participants have indicated that the Rubric helps to safeguard a common understanding of the evaluation and accreditation criteria and therefore, the consistent implementation of these evaluation and accreditation activities.

The same rubric is used both for the IEEP and IAP, irrespective of the differences in intended outcomes. It is useful to mention that the IEEP's purpose is to prepare HEIs for the more formal procedure, the IAP, that not only will provide HEIs with valuable recommendations for improvement, but will formally state the level of institution's compliance through the formal accreditation decision.

In the IAP, carried out using the THEQC Evaluation Criteria, the evaluation is based on the following grading system:

- 300 points for Leadership, Governance and Quality heading;
- 400 points for Learning and Teaching heading;
- 200 points for Research and Development heading,
- 100 points for Service to Society heading, 1000 points in total.

The maturity level of each sub-criterion is determined within the scope of the Institutional Accreditation Program, and the general approach to the maturity level of the sub-criterion is as follows: the maturity level of "5" corresponds to the full score, and the maturity level of "1" corresponds to the lowest score.

As a result of the maturity level evaluation of the sub-criteria under every criterion within the scope of the Institutional Accreditation Program, the following decisions are made:

"Full accreditation" is awarded if the score is 650 and above;

¹⁰¹ A detailed description of the Rubric is provided under the ESG standard 2.2

"Conditional accreditation" is awarded if the score is between 500 and 649 points, "Refusal of accreditation" is decided if the score is less than 500 points.

Full accreditation is granted for a five-year period, and conditional accreditation is granted for a two-year period. The higher education institutions with scores of less than 500 points are refused accreditation but they may reapply after 24 months has elapsed. Higher education institutions that fail to get 280 points out of 400 points in the Learning and Teaching heading may not be awarded full accreditation even if their total score is 650 or above, resulting in the award of conditional accreditation. Once the accreditation decision has been made regarding the IAP, an official Accreditation Decision Letter is sent by THEQC to the HEI summarising the issues required for further quality development.

The decisions to grant full accreditation and conditional accreditation regarding the Institutional Accreditation Program or Joint Institutional External Evaluation and Accreditation Program are sent to the Council of Higher Education to be published in the Higher Education Programs and Quotas Guide¹⁰².

The criteria and the rubric applied in the IIAP are very similar to the national criteria and are implemented according to the same logic. The concept of 4 criteria and 46 sub-criteria with its current weightings has been maintained. The sub-criteria are referenced to ESG standards. The table of evaluation criteria and sub-criteria (the Rubric) has been extracted from the existing ISER Writing Guide and Evaluation Programs Guides and issued as a separate document, available on the agency's website¹⁰³.

The differences between the IIAP from IAP concepts are the following:

- 1) The heading of the first evaluation criteria in IIAP is "Governance and Quality", instead of "Leadership, Governance and Quality" in IAP;
- 2) Some elements of local legislation and wording have been simplified.

The consistency of the evaluations that are carried out by different teams of external experts is ensured by the implementation of various practices:

- 1) Training of experts. During the site visit, the experts have indicated the high value of the training content, especially when the training had practical activities, such as case study analysis, site-visit simulations, report writing activities, etc.
- 2) Drafts of the reports. The agency provides the experts with the draft report in the QAMIS system, which allows them to grasp the concept of what is expected from evaluators;
- 3) Consultations with the agency. During the site visit, the panel asked about the actions of the team of experts if any situation is unclear to them. All the experts have indicated that in such a case they would immediately contact the agency and ask for advice. In their opinion, THEQC is very supportive of the experts and very open in sharing their expertise and knowledge;
- 4) Establishment of the coordinator role in the IIAP: With the role of supporting the expert teams, the coordinator may screen the report.
- 5) Establishment of observer role: this nominated THEQC staff members can be involved in any type of QA procedures as decided by THEQC. This position contributes to the consistency of the evaluation and accreditation procedures by observing their application and ensuring this is in accordance with the published procedures.
- 6) Consistency check. An additional measure to enhance the quality of the reports is a consistency check, performed by the permanent Commission on Institutional External Evaluation and

¹⁰² Article 21 of the Regulation on Higher Education Quality Assurance and the Turkish Higher Education Quality Council

¹⁰³ https://www.yokak.gov.tr/documents/international-doc/EN_UKAP_DEGERLENDIRME_OLCUTLERI_v.1.0a.pdf

Accreditation (Evaluation Programs Guide p. 25; International Institutional Accreditation Program Guide p. 35). The scope of such a consistency check is to ensure consistency between evaluations conducted in different institutions in the same evaluation period / or between years. According to the Article 5 of Turkish Higher Education Quality Council Consistency Directive, the criteria for the consistency check for the IEEP and IAP reports are the following: Each statement made by the team in the evaluation report for each sub-criterion should comply with the maturity level determined; Evaluation of maturity levels should be evidence-based; The tone of the reports should be objective and should not be judgemental of the institution and / or making comparisons between it and other institutions;

7) The authorisation of the reports by the Council.

The panel also analysed the outcomes of the IEEP and IAP (as stated earlier, the IIAP evaluation has not been implemented yet).

Year	IEEP	FuP	IAP	IAP Decisions	MtEP	MtEP Decisions	IIAP
2016-19	158	n/a	n/a				n/a
2020	13	58	11	6 full, 5 conditional			n/a
2021	13	44	12	7 full, 5 conditional			n/a
2022	3	43	30	5 full, 25 conditional-			n/a
2023	2	25	21	3 full, 17 conditional, 1 refused	9	1 full, 2 conditional, 6 continued	n/a
2024	5	5	35	n/a	14	n/a	n/a

According to the SAR, in April 2024, 191 HEIs out of 208 across Türkiye had been evaluated through the IEEP (92%), 169 out of 208 through the FuP (81%), and 74 out of 208 through the IAP (36%).

Ten HEIs out of 74 have been accredited through the MtEP. In the 2024 cycle, THEQC is to evaluate 5 higher education institutions through the IEEP, 6 through the FuP, 35 through the IAP, and 13 through the MtEP.

During the site visit, the panel asked multiple participants why there are so many cases of conditional accreditations. The responses to this question were constructive and demonstrated a reflective approach on the part of the HEIs. According to the HEIs who have received conditional accreditation, they said that they view these conditional accreditations both as a challenge and an opportunity for improvement. They expressed their trust in the agency, its activities and outcomes as transparent and quality-oriented.

Analysis

The panel was provided with sufficient evidence to conclude that the agency has established a trustworthy and accessible framework, with a focus on consistency. The Rubric concept, which not only links criteria and sub-criteria with the maturity levels of PDCA elements, but also elaborates the maturity level in regard to every sub-criterion, providing samples of evidence, is, in the panel's view, a high-quality methodologic tool that standardises practical understanding as well as the application of the evaluation criteria. The publicly available documents that are regularly reviewed and updated are also explained during training and consultations.

The compliance with this ESG standard is also safeguarded through a consistency check by the Commission on Institutional External Evaluation and Accreditation which is applied in all 3 QA activities under the scope of ESG. The panel confirms that the development of the consistency check concept has fulfilled the recommendation from the 2019 ENQA full review.

Panel commendation 5

The panel commends the Rubric concept, which not only links criteria and sub-criteria with the maturity levels of PDCA elements, but also elaborates the maturity level in regard to every sub-criterion, providing samples of evidence.

Panel commendation 6

The panel commends the comprehensive consistency check by the Commission on Institutional External Evaluation and Accreditation that the agency established in all 3 external quality assurance procedures (the IEEP, IAP and IIAP).

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

The outcomes of the two QA procedures within the scope of the ESG, i.e. the IEEP and IAP programmes, are the following reports¹⁰⁴: IFR (Institutional Feedback Report) (IEEP); Follow-up reports (IEEP); IAR (Institutional Accreditation Report) (IAP); Mid-term evaluation reports after follow-up (IAP). Although at the time of the review, the IIAP evaluation procedure was fully developed and adopted by the Council of THEQC, this type of evaluation had not been put into practice yet. Therefore, there are no results of the process as yet.

The Evaluation Program Guide and International Institutional Accreditation Guide set out a comprehensive framework for the preparation, revision, consistency check and the approval of all types of reports. These guides set the main quality points for report writing: accuracy, impartiality, evidence-based approach, format, style and grammar. This concerns reports within all 3 procedures: the IEEP, IAP and IIAP.

When an HEI undergoes the evaluation procedure according to the IEEP programme, an Institutional Feedback Report is issued. However, the completion of the IAP procedure has different outcomes: Institutional Accreditation Report and accreditation decision (Evaluation Programs Guide p. 24, 25). These reports are drafted by the external experts within 21 days after the site visit and then sent to HEIs for feedback. The scope of the feedback covers the areas for improvement and the correction of mistakes and factual errors, if any (Evaluation Programs guide p. 24). After the “21-day response”¹⁰⁵

¹⁰⁴ This list also contains the reports that are prepared after the different follow-up activities.

¹⁰⁵ In case of IIAP this response is called the comparison chart.

is received, the external expert team considers if any revisions to the report are needed, after which the report is finalised.

In the case of the IIAP, the only difference is one additional step: the report screening by the evaluation coordinator appointed from THEQC's staff (International Institutional Accreditation Program Guide p. 34).

All the reports are written using the QAMIS system. The draft of the report is already embedded within the system. Experts are required to fill in the sections. During the presentation of QAMIS, staff members of THEQC demonstrated that the data from the ISERs is visible under each sub-criterion.

According to the SAR, the reports consist of:

- The information regarding the composition of the panel, the methodology applied, institution's profile, context, strengths and weaknesses coming from the previous evaluation;
- the section dedicated to the institution which contains information about the vision, the mission, strategic goals, organisational structure and key statistics.
- the section, where the analysis against the criteria and sub-criteria set by THEQC is provided.
- the last section of the report which summarises the findings and the recommendations.

The agency performs a consistency check as an additional measure to enhance the quality of reports. This activity is performed by the permanent Commission on Institutional External Evaluation and Accreditation (Evaluation Programs Guide p. 25; International Institutional Accreditation Program Guide p. 35). The scope of a consistency check is to ensure consistency between evaluations conducted in different institutions in the same evaluation period / or between years. If the consistency check determines that the report should be reviewed, it is returned to the expert team for revision. The reports are authorised by the Council of THEQC and then published on the agency's website¹⁰⁶. Accreditation decisions for the IAP and IIAP are declared and available for all to see on the website. Fifty-nine reports on 59 institutions are also published on DEQAR¹⁰⁷.

However, the panel was unable to find the information about the scores HEIs were awarded in the IAP procedure¹⁰⁸ (overall score and scores under each evaluation heading and criteria, as is stipulated in Evaluation Programs Guide, p. 25, 26).

The reports are visible on the website only if one selects the year. The webpage does not allow one to search for reports by using the name of the institution.

The agency's website also makes available the ISERs (Institutional Self-Evaluation Reports) that are produced annually and submitted to the agency by the HEIs.

The reports are published in Turkish; however, in some of them, the standards and maturity level status are provided in English. This discrepancy could have occurred due to the fact that the reports are prepared within the QAMIS system and are printed directly from the system, but this was not detected in all of the reports.

The panel has analysed several reports from each category. During the site visit, all the stakeholders involved confirmed that the reports are very valuable, as they flag the areas of improvement and provide recommendations for development.

According to the SAR, the agency intends to update the QAMIS system. The planned updates will enable side-by-side yearly document comparisons and easier access to evidence. Also, this improvement will send automated reminders to staff which should enable a smoother workflow.

¹⁰⁶ Section "Reports" at the first level of the website.

¹⁰⁷ <https://www.eqar.eu/register/agencies/agency/?id=64>

¹⁰⁸ The final score determines the type of the accreditation decision

Analysis

The panel concludes that the reports are prepared under the well-established framework of quality assurance within the agency. The digital Evaluator Module within QAMIS provides the experts with easy access to the ISER and other evidence. The methodologic tools (such as Rubric) standardise the understanding and interpretation of the criteria, sub-criteria, the maturity levels and links between them. The quality of the reports is good.

However, the panel would like to highlight the importance of the provision of overall score and scores under each evaluation heading and criteria under the IAP and IIAP program, as the awarded scores determine the length of the accreditation period.

The implementation of this panel recommendation could contribute further to the transparency of the outcomes of the evaluation and would support the accreditation decision.

Panel recommendation 10

The panel recommends publishing the scores of the IAP and IIAP procedures.

Panel suggestion for further improvement 8

The panel suggests exploring how to make the process of searching for the evaluation and accreditation results on the agency's website more user-friendly.

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.

2023 EQAR conclusion:

"In the light of the advancements made by the agency to improve the transparency of the complaints and appeals system, the Register Committee found that the agency now complies with the standard. The Committee, however, highlighted the panel's [comment] that that next review should evaluate the efficacy of handling complaints and appeals."

Evidence

The right to express disagreement related to the procedures within the scope of the ESG, i.e. the IEEP, IAP and IIAP and their outcomes, is embedded in the THEQC's framework: Evaluation Programmes Guide¹⁰⁹ and International Institutional Accreditation Program Guide¹¹⁰.

To handle these issues, THEQC has established the Commission on Complaints and Appeals which operates according to the Turkish Higher Education Quality Council Directive of Complaints and Appeals. This document is situated on the website of the agency and is publicly available¹¹¹.

¹⁰⁹ [https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20\(1\).pdf](https://www.yokak.gov.tr/documents/national-doc/THEQC-Evaluation_Program-guide_3.1.1%20(1).pdf)

¹¹⁰ https://www.yokak.gov.tr/documents/international-doc/EN_INTERNATIONAL_INSTITUTIONAL_ACCREDITATION_PROGRAM_GUIDE_v.1.0a.pdf

¹¹¹ <https://www.yokak.gov.tr/documents/mevzuatlar/AppealsandComplaintsDirective.pdf>

The Commission comprises 4 members (3 active and 1 substitute member). The Commission members are determined by the Council in consideration of the following:

- One of the Commission members should be a former Council member;
 - One of the Commission members should have experience in evaluation processes;
 - One of the Commission members should have managerial experience in an accreditation agency.
- Current members of the Council cannot be members of the Commission. The Commission members' term is three years. One cannot be a Commission member for more than two terms.

Within the scope of the ESG, this Commission is responsible for assessing appeals against:

- the decisions taken within the scope of the Institutional Accreditation Program carried out by the Council;
- the Institutional Feedback Reports published within the scope of the Institutional External Evaluation Program carried out by the Council;
- the Follow-up Reports published within the scope of the Follow-up Program carried out by the Council.

The Commission is also responsible for the assessment of the complaints regarding the services carried out by THEQC.

Appeals can be submitted within 60 days after the publication of the decision. Complaints should be submitted within 15 days of the incident which has generated the complaint.

The first step is that, the received appeal or complaint is screened by THEQC staff. If any formal discrepancies are detected, the appeal or complaint is returned to the applicant for revision. During the site visit, it was confirmed to the panel that, after the revision, the appeal or complaint can be re-submitted. The Commission assesses the appeal or the complaint and makes recommendations for the final decision to the Council of THEQC, which is obliged to issue its decision within 30 days.

During the meeting with the members of the Commission on Complaints and Appeals, it became clear that the numbers of appeals are very low, e.g., one of the members has assessed 3 appeals throughout their tenure, the other member took part in the hearing of just one appeal. No complaints have been received.

In the meeting with the participants from HEIs, the panel was provided with an explanation for the reason behind the very low numbers of complaints and appeals – participants said this was due to the high quality of the evaluation outcomes and the transparency of the procedures.

Currently, the Commission on Complaints and Appeals consists of 3 academics, there is no student member in this Commission.

According to the current framework, the Council issues the final decision regarding the appeals.

Analysis

The provided documentation and the evidence collected during the site visit, in the panel's view, are sufficient to conclude that the procedure for complaints and appeals is clear and comprehensive as well as familiar to HEIs.

The concept of the appeals and complaints is coherent and in-line with the ESG 2.7.

The panel has also raised the question as to whether the provided explanations regarding the low number of the appeals and no complaints is reasonable. In order to enhance the efficiency of the complaints and appeals procedure, the agency could carry out a targeted survey to further explore the reasons behind the low numbers of the appeals.

In order to consistently develop student representation in the work of the agency, in the panel's opinion, the agency would benefit from student representation within the Commission; thus, the panel suggests considering the possibility of making amendments to the Turkish Higher Education Quality Council Directive of Complaints and Appeals and including a student member on this Commission.

The panel has investigated the integrity of the process when the same body (the Council) validates the external evaluation reports, issues accreditation decisions and, at the same time, assesses the appeals regarding these decisions and issues the final decision regarding the appeal. In the panel's view, this regulation gives excessive powers to the Council and reduces trust in the validity of the final outcomes of the appeals process. Thus, the panel suggests exploring ways to reduce the influence of the Council in the appeals process.

Panel suggestion for further improvement 9

The panel suggests including a student member as a member of the Commission on Complaints and Appeals.

Panel suggestions for further improvement 10

The panel suggests delegating the final decision-making powers to the Commission on Complaints and Appeals following an appeal.

Panel conclusion: compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

1. The panel commends the agency's efforts integrating students into the agency's work and advocating for students' rights in HEIs through their active involvement, enabling students to engage with and enhance the QA culture in their HEIs (ESG 3.1).
2. QAMIS is an innovative digital tool that facilitates the work of the various participants of the evaluation and the accreditation procedures. The system positively affects the efficiency and integrity of the agency's QA activities (ESG 3.5).
3. The panel commends the progress the agency has made regarding follow-up procedures (ESG 2.3).
4. The panel commends the dedication of the external experts that perform their expert duties voluntarily (ESG 2.4).
5. The panel commends the Rubric concept, which not only links criteria and sub-criteria with the maturity levels of PDCA elements, but also elaborates the maturity level in regard to every sub-criterion, providing samples of evidence (ESG 2.5).
6. The panel commends the comprehensive consistency check by the Commission on Institutional External Evaluation and Accreditation that the agency established in all 3 external quality assurance procedures (the IEEP, IAP and IIAP) (ESG 2.5).

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

The panel has come up with the following judgements:

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

The panel has identified the following recommendations:

1. The panel recommends broadening the range of external stakeholders by considering the incorporation of stakeholders from other sectors. (ESG 3.1).
2. The panel recommends further reinforcing the role of students in the governing body of the agency by: 1) exploring the possibility of increasing the number of student Council members; 2) enabling the Student Commission to elect the Council student representative(s) (ESG 3.1).
3. The panel recommends initiating discussion regarding the structure of THEQC with the responsible state bodies in order to propose possible changes to better address the agency needs going forward (ESG 3.3).

4. The panel recommends revising the existing practices related to site visit expenditures and to transfer the reimbursement of external experts' expenses from HEIs to the regulatory area of the agency (ESG 3.3).
5. The panel recommends reviewing the existing internal process-based management system in order to simplify and clarify issues such as an employee's line manager and lines of accountability. (ESG 3.6).
6. The panel recommends reconsidering the deadline by which HEIs can submit documentation, and that the new deadline is no later than the end of the actual site visit (ESG 2.3).
7. The panel recommends initiating discussion with responsible bodies and other stakeholders to explore ways of remunerating experts for their work (ESG 2.4).
8. Although students are currently present in every expert team, to positively affect the clarity and the integrity of the methodologies, the panel recommends ensuring that the compulsory student participation is made explicit in the Evaluation Programs Guide and Institutional External Evaluation Directive. (ESG 2.4).
9. The panel recommends to amend the International Institutional Accreditation Program guide ensuring the mandatory participation of the experts with knowledge of the higher education system of the country where the cross-border evaluation will take place in every expert team. (ESG 2.4).
10. The panel recommends publishing the scores of the IAP and IIAP procedures (ESG 2.6).

SUGGESTIONS FOR FURTHER IMPROVEMENT

1. The panel suggests that the agency's involvement in the establishment of a national student organisation should focus on enabling it to be independent and to cover a range of responsibilities, not solely related to QA (ESG 3.1).
2. The panel suggests considering the preparation of a plan in advance in order to transfer the knowledge and experience of seconded academic experts to enable a smoother integration of the new staff (ESG 3.3).
3. The panel suggests having discussions on the benefits of stakeholder participation in the planning of thematic analysis so that the rationale underlying thematic analyses is better understood. (ESG 3.4).
4. The panel suggests adding systematic monitoring of staff workload to the daily activities of the agency (ESG 3.5).
5. The panel suggests strengthening the process of the monitoring of the performance indicators including involving employees with a role in strategic planning (ESG 3.6).
6. The panel suggests to evaluate the impact of the evaluation coordinator on the efficiency of the evaluation and accreditation procedures and, if positive, to consider establishing this position for the IEEP and IAP as well (ESG 2.4).
7. The panel suggests strengthening THEQC's internationalisation by involving experts that come from different countries and educational systems in the agency's external QA activities and consider using English as the language of evaluation more frequently. In order to achieve the regular involvement of international experts, the panel suggests considering using English as the language of evaluation more frequently (ESG 2.4).
8. The panel suggests exploring how to make the process of searching for the evaluation and accreditation results on the agency's website more user-friendly (ESG 2.6).
9. The panel suggests including a student member as a member of the Commission on Complaints and Appeals (ESG 2.7).
10. The panel suggests delegating the final decision-making powers to the Commission on Complaints and Appeals following an appeal (ESG 2.7).

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
01.10.2024 – Online meeting with agency's resource person				
	13:30-15:00 CEST	Review panel's kick-off meeting and preparations for site visit		
	15:00-16:00 CEST	An online clarifications meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and other pending issues	THEQC's resource person Contact person for the review Translator-Interpreter	Ieva Vaiciukevičienė
	16:00-17:00 CEST	Review panel's kick-off meeting and preparations for site visit (continues)		
14.10.2024 – Day 0				
	17:30-19:00	Review panel's pre-visit meeting and preparations for day I		
15.10.2024 – Day I				
	8:00-08:20	Ride to the Agency		
1	08:30-08:45	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting ¹¹²	THEQC's resource person and contact person for the review	Ieva Vaiciukevičienė, Melita Kovacevic
	08:45-09:00	Review panel's private discussion		
2	09:00-10:00	Meeting with the President and the Secretary General of THEQC	President of THEQC Secretary General of THEQC	Melita Kovacevic
	10:00-10:15	Review panel's private discussion		

¹¹² As there were no issues to clarify for the moment, this time was used for the panel's preparation.

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
3	10:15-11:00	Meeting with the representatives of the Commission on the Appeals and Complaints	Appeals and Complaints Commission member (Retired Professor) Appeals and Complaints Commission member (Professor at Selçuk University)	Topias Tolonen-Weckström
	11:00-11:15	Review panel's private discussion		
4	11:15 -12:15	Meeting with the Council members	Vice president, delegated by the Inter-University Council (IUC), full-time Council member Council member, delegated by the Council of Higher Education (CoHE) Director of Institute of Health Sciences at Marmara University Council member, delegated by the Council of Higher Education (CoHE), Dean of Faculty of Economics and Administrative Sciences at Boğaziçi University Council member, delegated by the Inter-University Council (IUC), Professor at Istanbul Teknik University Council member, delegated by the Ministry of National Education	Susan Hackett
	12:15-12:30	Review panel's private discussion		
5	12:30-13:30	Meeting with self-assessment team	Branch Manager, THEQC's resource person	Melita Kovacevic

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Translator-Interpreter (International Relations) Contact person for the review	
	13:30-14:15	Lunch (panel only)		
6	14:15-15:15	Meeting with the representatives of the staff involved in the evaluation and accreditation procedures (both local and international)	Expert Expert, Situation Report Branch manager, IIAP Expert, ISERs and Evaluator trainings Civil Servant IT Staff	Topias Tolonen-Weckström
	15:15-15:30	Review panel's private discussion		
7	15:30 – 16:15	Meeting with the representatives of the Agency's internal bodies 1: Commission on Institutional External Evaluation and Accreditation	Council member, Yildiz Technical University Expert, responsible person for Higher Education Evaluation Main Process Responsible person for IAP sub processes Academic Coordinator for Student QA Responsible person for IEEP sub processes	Susan Hackett
	15 min	Review panel's private discussion		
8	16:30 – 17:15	Meeting with local and international Advisors	Local Advisor, Sakarya University International Advisor, Freelance QA expert (online)	Melita Kovacevic
	17:15 – 17:45	Wrap-up meeting among panel members and preparations for day 2		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
		Dinner (panel only)		
16.10.2023 – Day 2				
	8:15-08:45	Ride to the Agency		
	08:45-09:00	Review panel's private meeting		
1	09:00-09:30	Meeting with the representatives of the Presidential Educational Policies Council	Council's representative, Eskişehir Technical University	Melita Kovacevic
2	09:30-10:00	Meeting with the representatives of the Council of Higher Education (CoHE) and the Ministry of National Education (MoNE)	Executive Board Member of the Council of Higher Education Executive Board Member of the Council of Higher Education Executive Board Member of the Council of Higher Education MoNE representative	Susan Hackett
	10:00-10:15	Review panel's private discussion		
3	10:15 -11:15	Meeting with the student representatives from the Student Commission and the Council	Student Commission President and THEQC Council member, Pharmacy student at Atatürk University Student Commission member, Law student at Koç University Student Commission member, Medical school student at Istanbul University Student Commission member, PhD student of Architecture, Bursa Uludağ University	Topias Tolonen-Weckström

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Student Commission member, Master Student at Physical Sciences at Van Yüzüncü Yıl University	
	11:15-11:30	Review panel's private discussion		
4	11:30 -12:30	Meeting with representatives from the reviewers' pool (local and international)	Vice Rector at Karabük University Representative from Isparta University Representative from Health Sciences University Quality Assurance expert at Quality Office, Istanbul Bilgi University (non academic member) Graduate student at İstanbul Medipol Üniversitesi, student expert Graduate Student at Karabük university, student expert	Susan Hackett
	12:30 – 13:15	Lunch (panel only)		
5	13:15 – 14:15	Meeting with the stakeholders (employers, students, local community.	Full member of TUBA, Turkish Academy of Science Vice president of the Vocational Qualifications Authority	Topias Tolonen-Weckström
	14:15-14:30	Review panel's private discussion		
6	14:30-15:20	Meeting with the top management of some reviewed HEIs	Rector of Bilkent Univ Rector (Foundation University)	Melita Kovacevic

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Rector of Bartın Üniv (State University) Rector of ODTÜ (State University) Rector of Uşak Univ (State University)	
7	15:20-16:10	Meeting with the quality assurance officers of some reviewed HEIs	Quality Management Coordinator at Ahi Evran University Institutional Development and Quality Coordinator at Akdeniz University Vice rector responsible for Quality Commission at Arel University Coordinator of Quality Commission at Gazi University	Susan Hackett
	16:10-16:20	Review panel's private discussion		
8	16:20-17:15	Meeting with Internal Commissions 2: Commission on Publicity and the Stakeholder Relations, Commission on International Relations	Person, responsible for Stakeholder Relations and In service training Member of international relations Commission	Melita Kovacevic
	17:15-18:00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions		
17.10.2023 – Day 3				
	8:00-08:20	Walking to the Agency		
	08:20-09:00	Review panel's private meeting		
I	9:00 – 10:00	Meeting with THEQC's management (HR, finances and etc.).	Financial Services Specialist (Finance and HR)	Susan Hackett

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Administrative Officer Computer Engineer (IT) Administrative Officer (IT, HEI Performance Indicators) Person, responsible for IT	
2	10:00 – 11:00	Meeting with CEO/resource person to clarify any pending issues (if necessary)	President of THEQC Secretary General of THEQC Branch Manager and resource person Expert, contact person for the review	Ieva Vaiciukevičienė
	11:00 – 12:00	Private meeting between panel members		
3	12:00 – 12:30	Tour around THEQC's premises and presentation of digital systems	Expert IT Staff Translator Computer Engineer Person, responsible for IT	
	12:30 – 13:30	Lunch (panel only)		
3	13:30 – 14:00	Final de-briefing meeting with staff and the Council members of the agency to inform about preliminary findings	The staff of THEQC and some members of the Council	Melita Kovacevic

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

TRIPARTITE TERMS OF REFERENCE BETWEEN THEQC, ENQA AND EQAR

May 2024

I. Background and context

First established in 2015 as the Turkish Higher Education Quality Board under the applicable regulation and restructured and renamed as the Turkish Higher Education Quality Council (THEQC) by law in 2017, THEQC is a public legal entity. Based in Ankara, THEQC is the sole national authority responsible for the quality assurance of 208 HEIs in the Turkish higher education system vested by law. THEQC consists of 13 members, including a student representative, who represent almost all major stakeholders of the higher education system of Türkiye. THEQC's mission is to enhance the quality assurance system of higher education in Türkiye, to contribute to the continuous improvement of HEIs and the achievement of universal competencies by individuals. THEQC's vision is to be an effective and internationally recognized institution in the field of quality assurance in higher education. At present, excluding the Council members, there are thirteen experts and twenty-five administrative employees.

The three main duties of THEQC are:

- to conduct external evaluation of HEIs,
- to execute the authorization process of national and recognition processes of international accreditation agencies, and
- to ensure internalization and dissemination of quality assurance culture in higher education institutions.

External Quality Assurance Activities run by THEQC:

- Institutional External Evaluation Program (IEEP): The IEEP is conducted after an institution graduates its first cohort of students. Based on THEQC Evaluation Criteria, it is an external evaluation method that enables the evaluation of leadership, governance, quality, learning and teaching, research and development, and service to society processes in higher education institutions within the scope of the “planning, doing, checking and acting” cycle. The IEEP aims to reveal the institutions' strengths and areas for improvement through site visits based on the Institutional Self-Evaluation Reports (ISER) written by the institutions. The IEEP is intended to prepare HEIs for the upcoming institutional accreditation process in a friendly manner.
- Institutional Accreditation Program (IAP): The IAP is an external evaluation method based on the same THEQC Evaluation Criteria. HEIs that complete the IEEP process are included in this program. Unlike the IEEP process, the Council takes an accreditation decision based on the output of IAP, the Institutional Accreditation Reports (IARs). In line with THEQC's mission, the IAP aims to contribute to the continuous improvement of HEIs

The planned activity of THEQC:

- International Institutional Accreditation Program (IIAP): The IIAP is the provisional cross-border external evaluation process in which international HEIs are evaluated based on the same THEQC Evaluation Criteria. The program has not been put into practice yet.

Other activities of THEQC are:

- To realize its role in ensuring the internalization and dissemination of quality assurance culture in the Turkish HEI landscape, THEQC organizes events, carries out various publishing activities, and cooperates with international organizations.

- Another activity and legal duty of THEQC is to execute authorization for national and recognition for international accreditation agencies. Accreditation agencies that are not recognized by THEQC can also operate in Türkiye; however, the program and institutional accreditation activities that they carry out are not included in the YKS Higher Education Programs and Quotas Guide, which is used for student placement within the scope of the Higher Education Institutions Exam. The authorization and recognition of independent accreditation agencies leads to THEQC endorsing of the agencies' operation in general, but it does not lead to THEQC adopting or endorsing single accreditation reports and decisions by these agencies. The activity is therefore not within the scope of the ESG.

THEQC has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2020 and is applying for renewal of membership.

THEQC has been registered on the European Quality Assurance Register for Higher Education (EQAR) since October 2022 and is applying for the renewal of EQAR registration.

2. Purpose and scope of the review

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

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

1. Institutional External Evaluation Program (IEEP) for HEIs
2. Institutional Accreditation Program (IAP) for HEIs
3. International Institutional Accreditation Program (IIAP) for HEIs¹¹³

Considering the renewal of THEQC's application to EQAR, the self-evaluation report and the external review report are expected to give specific attention to the issues where the Register Committee concluded in its last decisions that the agency complied only partially with the ESG, namely ESG 2.5 regarding whether and how the agency ensures consistent application of its criteria and ESG 3.3 regarding the dependency of the agency on staff paid by higher education institutions. Further details of the EQAR Register Committee's decisions can be consulted at the [following link](#).

Should anything change between now and the review, including introduction or change of the activities within and outside of the scope of the ESG, the agency should inform EQAR at the earliest convenience.

¹¹³ By the time of the application for renewal of registration on EQAR, the agency has prepared a draft methodology and organized consultation processes with stakeholders regarding the newly introduced activity. The panel is expected to cover the activity to the extent possible.

3. The review process

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

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between THEQC, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website¹¹⁴);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

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

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

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

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

¹¹⁴ The agency is encouraged to publish the ToR on its website as well.

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

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

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

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

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

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

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

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

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

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

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind *EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*¹¹⁵ to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

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

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

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

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

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

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

¹¹⁵ Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

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

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

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

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	May 2024
Appointment of review panel members	May 2024
Self-assessment completed	30 June 2024
Screening of SAR by ENQA Review Coordinator	July 2024
Preparation of the site visit schedule and indicative timetable	August/September 2024
Briefing of review panel members	September 2024
Review panel site visit	October 2024
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	November 2024
Draft of review report to be sent for a factual check to the agency	December 2024
Agency statement on the draft report to the review panel (if necessary)	January 2025
Submission of the final report to ENQA	January 2025
Validation of the review report by the Agency Review Committee	February 2025
Publication of report	March 2025
EQAR Register Committee meeting and initial consideration	Summer 2025
Decision on ENQA membership by the ENQA Board	September 2025

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>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report
ISER	Institutional Self-Evaluation Report
IEEP	Institutional External Evaluation Program
IAP	Institutional Accreditation Program
IIAP	International Institutional Accreditation Program
CoHE	The Council of Higher Education
ÜAK	Inter-University Council
MoNE	Ministry of National Education
VQA	Vocational Qualification Authority of Türkiye
ÖSYM	Centre for Assessment, Selection and Placement
TQF	Turkish Qualification Framework
FuP	Follow-up Program
MteP	Mid-term Evaluation Program

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY THEQC

- 1) Annual working plan;
- 2) The detailed Organisational Structure Chart;
- 3) The draft of Institutional Accreditation Program Agreement;
- 4) The draft of International Institutional Accreditation Program agreement;
- 5) Comparison of the Institutional Accreditation Program and the International Institutional Accreditation Program;
- 6) Higher Education Evaluation Main Process Card;
- 7) Methodology development and update sub-process chart.

OTHER SOURCES USED BY THE REVIEW PANEL

Agency's website

ENQA AGENCY REVIEW 2025

THIS REPORT presents findings of the ENQA Agency
Review of the Turkish Higher Education Quality
Council (THEQC), undertaken in 2024.