

Rejection of the Application by the Higher Education Quality Council of Turkey (THEQC) for Renewal of Inclusion on the Register

Register Committee
18 March 2021

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Ver. 1.0
Date 2021-03-30
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Application of:	17/07/2019
External review report of:	28/04/2020
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Fiona Crozier (chair), Luis Velon, Ignas Gaižiūnas (student), Simona Lache (academic)
Absented themselves from decision-making:	N/a
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 08/08/2019 2. External Review Report, 28/04/2020 3. THEQC statement on the report, 07/07/2020 4. Request to the Review Panel, 21/09/2020 5. Clarification by the Review Panel, 25/09/2020 6. Request to THEQC, 21/09/2020 7. Clarification by THEQC, 09/10/2020 8. Additional representation by THEQC, 04/02/2021

1. The application of 17/07/2019 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 08/08/2019, having considered clarification received from THEQC on 29/07/2019.
3. The Register Committee considered the external review report of 28/04/2020 on the compliance of THEQC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered THEQC' statement (of 07/08/2020) to the review report.
5. The Register Committee sought and received a clarification from THEQC (on 09/10/2020) and the chair of the review panel on (25/09/2020).

6. On 09/11/2020 the Register Committee invited THEQC to make additional representation on the grounds for possible rejection.
7. The Register Committee considered THEQC's additional representation of 04/02/2021.

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8. In considering THEQC's compliance with the ESG, the Register Committee took into account *Institutional External Evaluation (IEE)* and the *Institutional Accreditation Programme (IAP)*.
9. The Committee understood that IAP was launched after the visit of the review panel in late 2020, but that it had now become THEQC's main activity within the scope of the ESG, following the phasing out of the IEE. While the Committee welcomed the additional clarification on the IAP activity and understand that IAP resembles the IEE, the Committee underlined that this activity was insufficiently covered by the self-evaluation and external review report.
10. The Committee took note that the external *English preparatory schools (EPSs)* external evaluation was an ad-hoc, one-off review. Since the activity was no longer on offer at the time of the external review, it was not considered as part of THEQC's application to the Register.
11. Considering *the mission differentiation and specialization project* the Committee noted that THEQC has carried out the activity in conjunction with the *Institutional External Evaluation (IEE)* at the request of the Council for Higher Education (CoHE). The Committee understood that this is a separate external QA activity with additional performance indicators being applied. THEQC is however expected to ensure compliance with the ESG, irrespective of whether such activities are carried out on behalf of an external authority. The activity was therefore considered as part of this application.
12. The Register Committee noted that 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 and not pertinent to the application for inclusion on the Register. As a result, if THEQC were admitted to the Register it would only be able to upload its own reports to DEQAR, and not those of the other agencies it recognises.
13. The Register Committee found that the report provides sufficient evidence and analysis on THEQC's level of compliance with the ESG.
14. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.3 – Implementing processes

15. The Register Committee noted that THEQC is working on a new follow-up process that takes into account the structure of higher education institutions and the maturity of their internal QA systems.

16. While the Register Committee noted – from the agency’s statement to the review report – that THEQC had introduced the new maturity levels for internal QA systems, the Committee was unclear whether any changes were made to the agency’s follow-up processes and has therefore sought further clarification from the agency.

17. The agency explained in its clarification letter that an Institutional Follow-up Program (IFuP) was initiated at the beginning of 2020 and it is carried out for all institutions that have passed through an initial institutional external evaluation. The follow-up team performs a preliminary check of the institutional self-evaluation reports, performance indicators and other additional documents followed by a one-day online site-visit, which results in an Institutional Follow-up Report (IFuR) published by THEQC.

18. The Committee further noted that THEQC has only just initiated the Institutional Accreditation Programme (IAP); the follow-up process for this procedure has not yet been defined.

19. Having considered THEQC’s clarification, the Register Committee concurred with the panel’s conclusion that THEQC (substantially) complies with the standard.

ESG 2.4 – Peer-review experts

20. In considering involvement of students in peer-review teams, the panel stated that each expert panel includes a student evaluator. Following a cursory glance into the institutional external evaluation reports published by THEQC on its website, the Register Committee noted that students were not always listed among the peer-review experts. The Register Committee has therefore asked the panel whether it was aware of such exceptions and whether it was given any explanation.

21. The panel explained that the involvement of students was piloted only in 2018 and that it became part of THEQC’s procedure in the academic year 2019-20 (following the set-up of the agency’s Student Commission in October 2019). The panel was assured by those that it spoke to, including the student representatives, that it was now THEQC’s policy to include students on all review panels.

22. The Register Committee welcomed the panel’s explanation, but noted that students were not listed among the peer-review team members in a number of evaluations carried out in 2019 (e.g. Alanya University, Atasehir University, Şırnak University, Hakari University, Atasehir Adıgüzel Meslek Yüksek Okulu, Muş Alparslan).

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23. In its additional representation, THEQC explained that in situation where students were not involved in review panels, this was due to the lack of availability of the nominated student for that review. THEQC, however, acknowledged the lack of students in expert panels as a shortcoming and stated that in cases where the nominated student can no longer participate, a new student expert will be assigned. The Committee further noted the list of students nominated for the reviews scheduled to take place at the end of 2020.

24. Considering the clarification provided the Register Committee concluded that THEQC complies with standard 2.4.

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ESG 2.5 – Criteria for outcomes

25. The panel observed during its review that the maturity level gradings are not published by THEQC. In its statement to the review report, THEQC stated that the maturity levels have since January 2020 been included in all reports. The Committee could verify that indeed the full criteria are now published.

26. The panel further commented that the criteria used for the mission differentiation and specialization project is the same as THEQCs general criteria but that some additional performance indicators are added to them.

27. THEQC further explained (see clarification letter) that it did not have ownership over the mission differentiation and specialisation project, and that the additional indicators were specifically used by the Council for Higher Education (CoHE) to prepare their analysis on a number of state universities. The Register Committee, however, underlined that the agency maintains responsibility for transparency and compliance with the standard also when it implements a third-party process; it is THEQC's responsibility to only accept carrying out such activities where it can ensure compliance with the ESG and THEQC is thus expected to assure that such indicators are published. In its additional representation response THEQC stated that the performance indicators under the mission differentiation and specialization project have now been published on the official website of THEQC. The Committee could verify that.

28. In reviewing the consistency in the application of criteria for institutional external evaluations and the assessment by maturity levels, the panel found they were not clearly defined and explained. The Committee however noted from the agency's statement to the review report that the maturity levels of institutions against the THEQC criteria has been now reorganised to be more explicit and specific and that it had been already included in the reporting activities starting with 2020.

29. In the context of the new institutional accreditation process the panel believed that THEQC needs to develop and implement a new assessment system, based on an approach more suitable for a decision-making process related to accreditation. The Register Committee has therefore asked the

agency to clarify whether it has revised its criteria and its system for decision-making for institutional accreditations.

30. In its additional representation THEQC added that the Institutional External Evaluation and Accreditation Criteria apply to all its institutional procedures, including IAP. The Register Committee was able to verify that the criteria is published on the agency's website but noted that the consistency check is expected to be further addressed in THEQCs next review.

31. Having confirmed that the agency has pre-defined and published criteria for its activities, the Register Committee was now able to follow the panels conclusion of (substantial) compliance with standard 2.5.

ESG 2.6 – Reporting

32. The Register Committee noted that the results of the institutional external evaluation (ISER and IFR) are published by THEQC on its website, but not those from the institutional accreditation (IAP), and thus asked the agency to clarify if any reviews have been finalised with the new procedure.

33. The agency explained that the Institutional Accreditation Programme has been delayed due to the pandemic (see also ESG 2.5) and expected that the accreditations would be resumed at the end of 2020, following which the institutional accreditation reports would be published.

34. In its additional representation, THEQC stated that it had completed only one Institutional Accreditation Program (IAP) by the end of 2020 and that the agency would begin to publish IAP reports by February 2021. **As of March 2021, the Register Committee could not verify the publication of any Institutional Accreditation Program report, in particular not the report from the procedure finalised in 2020.**

35. Considering the consistency of institutional external evaluation reports (ISER and IFR) the panel formed the view that this was not systematically ensured. While the agency has taken in the recommendation of the panel to include the maturity level grades as part of these reports (see also under ESG 2.5), the Committee underlined the panel's recommendation on the need to also introduce mechanisms to ensure consistency not only for the structure of the reports but also of the depth the reports provide.

36. In its additional representation the agency stated that an analysis was performed on its rubric assessment approach, but that the analysis was not finalised in time for its site-visit. THEQC added that a consistency and usefulness analysis was also carried out with different stakeholders on its rubric reporting approach.

37. The Committee welcomed the analyses carried out by the agency, but considered that the panel's concerns have not been addressed since the analyses did not address the content of the reports.

38. **Considering the delay in the publication of reports and the concerns expressed by the panel regarding the content of review reports, the**

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Register Committee concurred with the panel's conclusion that the agency complies only partially with ESG 2.6.

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ESG 2.7 – Complaints and appeals

39. The Register Committee noted from the panel's analysis that the agency's appeals and complaints processes were not clearly defined.

40. The panel stressed that as the agency moves towards an institutional accreditation process, it will need to reevaluate its current processes for both complaints and appeals.

41. The Committee further noted that the agency does not have a designated body to handle appeals, but that they are considered by the Council in consultation with the IEE Commission.

42. In its additional representation, THEQC explained that it has developed and integrated the complaints process into its Feedback Management System. The Register Committee was able to verify that the new complaints process and form is easily accessible on THEQC's website.

43. With a view to appeals, the Register Committee welcomed the decision to establish a distinct Appeals Committee to handle appeals and took note of THEQC's newly developed Directive of Complaints and Appeals.

44. The Committee, however, noted that the Appeals Committee is not part of THEQC's organisational chart and that no information is provided on the members of the Appeals Committee.

45. Since it was unclear whether the new process of handling appeals is fully in place, the Register Committee remained unable to conclude that THEQC meets the requirement of the standard, but concluded that THEQC complies only partially with standard 2.7.

ESG 3.1 – Activities, policy and processes for quality assurance

46. Considering the mentorship programme run by the agency, the Register Committee noted the panel's concerns related to the possible conflict of interest of such experts providing support to institutions.

47. Considering THEQC's shifts towards institutional accreditation and the panels' recommendation to ensure that any conflict of interest is avoided in this new activity, the Committee asked the agency whether it has kept or discontinued its mentorship programme.

48. The agency explained that the mentorship programme was a feature of the Institutional External Evaluation Programme (IEEP) and that THEQC continues to carry out evaluations for higher education institutions that have been newly established or have no graduate students. The agency added that it has launched a new call for mentors in 2020, and that those mentors are requested to declare possible interest when assigned to an institution, and to sign a Code of Ethics as well.

49. The Committee further noted the panel's concerns regarding the design of methodologies and other related documents, which are only discussed by the Council with no further consultation being carried out with THEQC's stakeholders. The agency did not comment on this issue in its additional representation.

50. The panel's analysis further shows that the participation of students is limited compared to that of other Council members, as no student was included in any of the Council's commissions. In its additional representation, THEQC stated that students now actively participate in two additional committees.

51. **The Register Committee welcomed the clarification and steps taken to prevent conflict of interest in its mentorship programme and nomination of students in the agency's governance. The Committee, however, underlined that the effectiveness of stakeholder involvement in the agency's governance and work has yet to be fully reviewed in practice, in particular with regards to stakeholder consultation in the design of methodologies. The Committee therefore considered that THEQC complies only partially with ESG 3.1.**

ESG 3.3 – Independence

52. The panel noted that THEQC's operational independence is affected by the key role played by experts and consultants, who serve as the agency's professional staff but remain employed and on the payroll of higher education institutions.

53. The analysis of the panel showed that the current organisational structure of the agency affects the independence of its operations and formal outcomes since there is a potential for conflicts of interest to arise regarding the different roles played by the Councils' members.

54. The agency responded in its statement to the review report that THEQC had increased the number of permanent employees (4 new full-time employees started working for the Council in 2020). The agency also stated that its organisation structure was defined by law, but it had nevertheless conveyed the recommendation related to THEQC's organizational structure to the relevant authorities.

55. In its additional representation the agency added that as of January 2021, the number of THEQC employees had further increased and that the duties and responsibilities of the Council members had been reframed.

56. While the Register Committee noticed the increase in the number of permanent staff, the Committee considered that the agency is still relying to a large extent (14 of 35 staff members) on experts and consultants that are at the same time on the payroll of higher education institutions. This could constitute a conflict of interest for obvious reasons.

57. The Committee thus concluded that the panel's concerns related to THEQC's operational independence have not been fully addressed and

concurred with the review panel that THEQC complies only partially with ESG 3.3.

ESG 3.5 – Resources

58. According to the panel's analysis the allocation of the budget has not been made considering the agency's real financial needs and its Strategic Plan for 2019-2023.

59. The panel further expressed concern regarding the sustainability of agency's processes as they do not rely on permanent professional staff, but almost entirely on the 'voluntary' nature of the work of evaluators and staff seconded to the agency.

60. In its statement to the review report THEQC responded that it had made its budget plan within the scope of Strategic Planning in Public Institutions, following the Law on Public Finance Management and Control (No. 5018). The agency added that the strategic plan also includes a budget, which can be provided at request.

61. In its additional representation the agency explained that the number of its permanent employees increased from 10 to 21 in over a year and a half. While the agency still has 14 staff members seconded and paid by higher education institution, the Committee concluded that human resources are nevertheless sufficient to allow THEQC to carry out its activities within the scope and in line with the ESG.

62. Considering the additional representation and the changes to THEQC's staffing the Register Committee concluded that THEQC now complies with ESG 3.5.

ESG 3.6 – Internal quality assurance and professional conduct

63. The Register Committee noted THEQC's recent development of an internal quality assurance system, in line with the results of the Plan-Do-Check-Act methodology and the 2019-2023 Strategic Plan.

64. While the panel commended the use of platforms and on-line tools for the implementation of the internal quality assurance system and the dissemination of relevant information, the panel found a number of issues that remained to be addressed in order for the quality assurance system to foster continuous improvement: existing confusion amongst experts, consultants and staff regarding their responsibilities in internal quality assurance matters, the lack of any corrective measure if an evaluation team were to fail to complete its task with the production of a satisfactory report.

65. THEQC explained in its additional representation that it had prepared a chart clarifying the roles of staff, council and commission representatives (see Annex 9). THEQC further added that higher education institutions have a chance to comment on factual issues before reports are finalised, which then have to be addressed by the review panel.

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66. The Register Committee welcomed the clarification provided but underlined that the effectiveness of THEQC's internal quality assurance system to foster continuous improvement in its processes is still to be reviewed in practice as the current improvements are not a result of the agency's internal QA system but a result of an external feedback. The Register Committee further considered that the internal QA system should be designed so as to further support the successful implementation of the agency's activities in particular considering THEQ's newly launched *Institutional Accreditation Programme (IAP)*.

67. The Committee could therefore not follow the panels' conclusion of compliance, but considered that THEQC complies only partially with ESG 3.6.

68. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

69. 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	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Substantial compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Substantial compliance	Compliance
2.6	Partial compliance	Partial compliance
2.7	Partial compliance	Partial compliance
3.1	Substantial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Partial compliance	Partial compliance
3.4	Full compliance	Compliance
3.5	Partial compliance	Compliance
3.6	Substantial compliance	Partial compliance
3.7	(not expected)	Compliance (by virtue of applying)

70. Also after duly considering THEQC's additional representation, the Register Committee concluded that THEQC only achieved partial compliance with a number of standards. THEQC thus fails to meet some key requirements of the ESG and, in its holistic judgement on the basis of the

documentation available and THEQC's representation, the Register Committee remained unable to conclude that THEQC complies substantially with the ESG as a whole.

71. The issues raised under standards 2.6, 2.7 and 3.1 reflect that THEQC has not yet been able to demonstrate in all areas that the ESG are implemented consistently in practice while partial compliance with standard 3.3 relates to questions still remaining regarding the organisational independence of the agency. Partial compliance with standards 3.6 reflects that THEQC is a recently established agency who has yet to fully demonstrate the effectiveness of its internal QA system.

72. Given that THEQC fails to meet some key requirements of the ESG, in its holistic judgement the Register Committee remained unable to conclude that THEQC complies substantially with the ESG as a whole.

73. The Register Committee therefore rejected the application.

74. THEQC has the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review. The Register Committee further underlined that the implementation of the Institutional Accreditation Programme is yet to be externally reviewed as an activity on its own and the Committee is confident that this could be done in a focused review organised once the issues mentioned in this decision have been addressed.

75. THEQC has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.

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Higher Education Quality Council of Turkey (THEQC)

Universiteler Mah. 1600. Cad. No:10 Bilkent

Prof Dr. Muzaffer Elmas, President of THEQC

06800 Ankara

Turkey

Brussels, 8 August 2019

Confirmation of Eligibility: Application for Inclusion on the Register Application no. A90 of 17/07/2019

Dear Muzzafer,

We hereby confirm that the application by THEQC for inclusion on the Register is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA - European Association for Quality Assurance of Higher Education fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activity of THEQC is within the scope of the ESG:

- *institutional external evaluation (IEE)* including the annual monitoring of internal quality assurance activity of HEIs.

We understand that annual monitoring it is not a separate activity, in its own right but a monitoring or follow-up activity carried out as part of THEQC's IEEs procedure, and should thus be addressed together.

In the application form THEQC stated that it did not consider the following activities to be within the scope of the ESG:

- *english preparatory schools (EPSs) external evaluation.*

We considered the information provided and came to the conclusion that the activity is within the scope of the ESG as the english preparatory schools are part of a higher education degree and the external evaluation follows predefined processes and criteria (Fields and Minimum Assessment Criteria) addressing teaching and learning in higher education. Such activities are within the scope of the ESG irrespective if they are carried out regularly or on ad-hoc, voluntary basis. The activity should thus be analysed in the external review of THEQC.

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EQAR Founding Members:



We confirm that the following activities are not external QA activity within the scope of the ESG:

- mentorship programme. The activity is however pertinent to the agency's application in EQAR in particular referring to the agency's compliance with ESG 3.1 and ESG 3.3. Please ensure that THEQC's self-evaluation report and the external review report address the way in which the agency ensures that its mentorship support activities offered to higher education institutions are separated from its external evaluation activities (please refer to Annex 5 of EQAR's Use and Interpretation of the ESG¹).
- annual situation report of the higher education system in Turkey. The activity is however relevant in relation to the agency's compliance with ESG 3.4, to the extent THEQC's annual situation reports describe and analyse the general findings of the agency's external QA evaluations.
- reviews of HEI within the "mission differentiation and specialization project" of CoHE is not a separate external QA activity but an activity undertaken on top of the IEE procedure and therefore should be considered as part of the procedure, to the extent it concerns aspects related to teaching and learning in higher education.

We further note that authorization and recognition of independent accreditation agencies is not an external QA procedure concerning higher education institutions but a recognition process of quality assurance agencies. **The self-evaluation report and external review report should thus address the recognition procedure of quality assurance agencies that are not EQAR-registered referring to THEQC's Criteria for Authorization and Recognition of Accreditation Agencies.**

Please ensure that THEQC's self-evaluation report covers all the aforementioned activities.

We will forward this letter to ENQA - European Association for Quality Assurance of Higher Education in its capacity of the coordinator of the external review. At the same time we underline that it is THEQC's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. THEQC has the right to appeal this

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https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2_0.pdf

decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: ENQA (coordinator)

Application by THEQC - Higher Education Quality Council of Turkey (THEQC) for Inclusion on the Register

Register Committee

Minutes of Telephone Conversation

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Date of the conversation:	29/07/2019
Representative of THEQC:	Aslihan Nasir
Representative of EQAR:	Melinda Szabo

1. THEQC has submitted on 17/07/2019 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and THEQC's activities within the scope of the ESG, EQAR contacted THEQC via telephone to clarify the matters below.
3. THEQC agreed to clarify the matters by means of a telephone conversation.
4. The *annual monitoring of internal QA activity of HEIs* is based on the institutional self-evaluation reports (ISER) prepared annually by all Turkish HEIs. The self-evaluation reports are considered by THEQC during their institutional external evaluation (IEE) as supporting the progress of internal quality assurance systems. The guide to prepare the institutional self-evaluation report is based on the evaluation criteria of the *institutional external evaluation* activity.
5. According to the related rules and regulations, HEIs are required to undergo IEE at least once in five years. The external evaluation teams prepare Institutional Feedback Reports (IFRs) after their site visits. THEQC identifies strengths and weakness of higher education system by publishing annual reports through the consolidation of both ISERs and IFRs.
6. The *English preparatory schools' (EPSs) external evaluation* is carried out by THEQC based on specific criteria and guidelines (Fields and Minimum Assessment Criteria). The evaluation process is based on a peer evaluation process of aspects related to teaching and learning in higher education and it is voluntary in nature. This is a pilot project and about 5% of higher education institutions offer EPS that are externally reviewed by THEQC.
7. The activity *reviews of HEIs within the "mission differentiation and specialization project"* was carried as part of an initiative of the Council of Higher Education in Turkey. The process did not entail a separate external QA procedure, but it was carried out during the regular institutional external evaluations of THEQC, having a set of additional sub-standards and detailed performance indicators added to the regular QA procedure. This is a complimentary report for the other monitoring mechanisms used by CoHE. The results of the review allowed CoHE to differentiate higher education institutions based on specialisation and allocate

funding to support regional development. This is an on-going project of CoHE and in case of demand from CoHE, THEQC will continue to carry out such activities.

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8. The “mentorship program” is set up to provide tailor support to higher education institutions preparing for the institutional external evaluation. The guidance is provided by experts who have been involved in previous evaluations, but who are not members of the THEQC. In addition the agency regularly organizes trainings and activities in different formats as well as more tailored mentorship programs for individual HEIs. During the mentorship program, the mentors do not write any report or bring up any improvement suggestions for the HEIs or give feedback to the evaluation teams. The mentors’s task is to prepare the HEIs for the IEE on i.e. how to write Institutional Self-Evaluation Reports (ISERs) or prepare for the different stages of the site visit etc. THEQC assigns mentors to HEIs having regard to avoid conflict of interest situations.

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Responses of THEQC to Panel's Draft Report

THEQC finds the draft report very valuable for its future directions. There are some issues that we want to make clarifications, hence we prepared this brief response list.

3.3. Independence

- THEQC's organizational structure is defined by law, so the recommendations made in this respect have been conveyed to relevant authorities. The Council had changes in its staff numbers since the ENQA panel's site visit. Recently, two employees assigned from HEIs returned to their home institutions while four new full-time employees started working for the Council in 2020. Thereby, the number of full-time staff is to reach 25 in a short period, and the total number of staff will be 38, including 13 advisors/experts/consultants.

3.5. Resources

- As of 2020, four full-time employees started to work for the Council, which means that the number of full-time staff is to reach 25 in a short while, and the total number of staff will be 38, including 13 advisors/experts/consultants. To improve its human resources, THEQC has been increasing the number of its full-time staff at a fast pace. In this sense, the Council has been improving the balance between permanent staff and the staff assigned from other institutions.
- As indicated by the panel, THEQC's current strategic plan is the Council's first. In accordance with Law No. 5018 on Public Finance Management and Control, THEQC has to make a budget plan within the scope of Strategic Planning in Public Institutions. THEQC constituted its budget in line with its strategic plan. Thus, strategic plan document also has a budget, which can be given as an additional document, if requested.

2.6. Reporting

- With the updates made since the site visit, maturity levels of institutions against the THEQC criteria has started being included in reporting activities. As of 1 January 2020, institutions have prepared their ISERs (Institutional Self Evaluation Reports) in accordance with the updates. Institutions' maturity levels against each THEQC sub-criterion will be accessible to all stakeholders via institutions' ISERs. Similarly, the institutional feedback reports (IFRs) and the institutional accreditation reports (IARs) written after site visits will include the maturity levels as of 2020 and will be publicly available.
- With the institutional accreditation program that has been introduced in 2020, THEQC has elaborated all its criteria on the basis of its rubric approach and applied this approach to the institutional self-evaluation and institutional external evaluation/institutional accreditation processes. By the utilization of the rubric approach, maturity levels have been reorganized to be more explicit and specific. In this context, institutions are required to provide evidence against these specific benchmarks in their self-evaluations whereas the same is expected from teams in the external evaluation process. Formerly, general definitions of the maturity levels scaled from 1 to 5 were applied to all sub-criteria. With the rubric approach, the definitions have been tailored to each criterion. For instance, for the "institutional performance management" sub-criterion, the definition of the maturity level 3 is: "Performance indicators and key performance indicators are defined in all the fields. However, the monitoring of these indicators are not systematic or do not cover all the fields.", whereas the maturity level 3 of the "leadership and quality assurance culture" sub-criterion is: "The institution has an institutional culture and leadership approach that complement the quality assurance culture

in the institution and cover all the units and processes. Certain results have been obtained from the activities conducted in this scope. But these practices are not executed as part of the integrated quality management of the institution and their results are not monitored.” The Council has received feedback from the institutions submitting their ISERs this year according to the new method, who expressed that the adoption of the rubric approach in self-evaluations contributed to the institutions more than the previous approach.

Brussels, 21 September 2020

Application by THEQC for Inclusion on EQAR

Dear Fiona,

The THEQC - Higher Education Quality Council of Turkey (THEQC) has made an application for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 28/04/2020 on which THEQC's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of THEQC's application:

We kindly ask you to clarify the following matters to inform the Register Committee's consideration and decision-making:

ESG 2.4 Peer-expert groups

Following a cursory glance into the IEE reports published by THEQC on its website, we noted that a number of reports do not include students in their list of panel expert i.e. see Alanya University, Atashehir University or İstanbul Esenyurt Üniversitesi.

Could you please clarify whether the panel was aware of such situation and if so, if they were given any explanation on why students were not involved in some of these evaluations?

We would be grateful if it was possible for you to respond by 5 October 2020, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on THEQC's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

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We acknowledge that it might not be possible to clarify all of the above.
However, we appreciate your assistance and I shall be at your disposal if
you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: Simona Lache
ENQA (coordinator)
THEQC

Fiona Crozier, on behalf of the ENQA review panel for the review of the Turkish Higher Education Council

25th September 2020

Melinda Szabo
EQAR
Rue d'Arlon 22
1050 Brussels
Belgium

Dear Melinda

Re: Application by THEQC for inclusion on EQAR

Thank you for your letter of 21st September. The ENQA review panel can respond to your query regarding student members of THEQC review panels as follows:

The self-assessment report submitted by THEQC informed the panel that the agency began to involve students in its review panels in 2018. During the site visit, the panel requested further, specific information on the involvement of students at the opening meeting, at a meeting with student representatives and again at the end of the visit at a final meeting with the President of THEQC. In fact, the involvement of students was piloted in 2018 but did not become procedure until the academic year 2019-20 (the agency's Student Commission was set up in October 2019 and, at the time of the site visit, had been meeting once a fortnight, supported by THEQC funding).

Review panel members did check a sample of review reports, but more from the perspective of the information that they contained and whether or not there was consistency in addressing all standards in all reports.

At the time of the site visit, the panel found it crucial, in the time available to it, to focus on the matter of the independence of reviewers in relation to standard 2.4; that section of the report sets out the review panel's lines of enquiry and ensuing recommendations.

The panel was assured by those that it spoke to, including the student representatives, that it is now policy to include students on all review panels.

I hope that this information is of assistance to the Register in making its decision. Please do not hesitate to contact me for any further information.

With best wishes,

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Fiona Crozier', written in a cursive style.

Fiona Crozier (panel chair)

Cc: THEQC review panel members (Ignas Gaižiūnas, Simona Lache and Luis Velón

Goran Dakovic, ENQA review manager

Brussels, 21 September 2020

Application by THEQC for Inclusion on EQAR

Dear Aslihan,

The THEQC - Higher Education Quality Council of Turkey (THEQC) has made an application for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

The EQAR Register Committee's rapporteurs have been considering THEQC's application for inclusion on the Register, based on the external review report of 28/04/2020.

We kindly ask you to clarify the following matters to inform the Register Committee's consideration and decision-making:

1. We noted from your statement to the review report that in 2020 THEQC introduced the institutional accreditation program. In relation to this, could you please elaborate on the following related matters:

ESG 2.3: Has the agency finalised its new follow-up process model (as detailed in its SER, p.28) and if so could you please elaborate on this model, in particular on whether and how the follow-up requirement is linked to the decision on accreditation by the Council (SER p. 28)?

ESG 2.5: Has the agency changed or developed a new system for decision making processes related to institutional accreditation? Could you further clarify what are the criteria used by THEQC in determining which higher education institutions are included in the Institutional Accreditation Programme?

ESG 2.6: Has the agency finalised any institutional accreditations in 2020 and if so are they published?

ESG 3.1: Has the agency discontinued or kept its current mentorship programme intended to support the first cycle of institutional external evaluations (IEE)?

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2. We noted that THEQC carries out evaluations (and monitoring) activities of higher education institutions within the *mission differentiation and specialization project* of CoHE. According to the panel this is presented as a separate report that it is not published by CoHE.

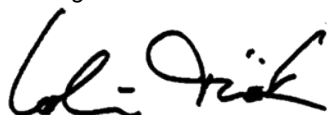
Could you please describe how are these processes developed (**ESG 2.2**), how are evaluators assigned to such an evaluation and what is the composition of such a panel (**ESG 2.4**), what are the extra set of sub-standards and detailed performance indicators included for these evaluations (**ESG 2.3**), and how are these criteria weighted (**ESG 2.5**)?

3. We noted that on its website THEQC has published a list of Institution Indicator Reports. Could you clarify the nature of these reports. Are they are linked to the IEE or to the *mission differentiation and specialisation project* (**ESG 2.6**)?

We would be grateful if it was possible for you to respond by 09/10/2020, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on THEQC's application.

Kind regards,



Colin Tück
(Director)

European Quality Assurance Register
of Higher Education (EQAR) | Aarlenstraat 22 rue d'Arlon |
BE-1050 Brussels
Colin Tück

– by email: colin.tueck@eqar.eu –

08.10.2020

Dear Colin Tück,

It is very pleasing to hear that Turkish Higher Education Quality Council (THEQC)'s application for initial inclusion on the EQAR has considered for inclusion on the Register by the EQAR Register Committee's rapporteurs.

We give our responses to the questions that you ask in order to make clarifications. The text below is including the questions asked by the EQAR Register Committee's rapporteurs (*in italics*) and followed by the THEQC's response:

1. We noted from your statement to the review report that in 2020 THEQC introduced the institutional accreditation program. In relation to this, could you please elaborate on the following related matters:

In order to clarify this statement, first of all let us give you some information about the programs that are run by THEQC. Institutional External Evaluation Program is the one which has been in action since 2016, and in addition to this program THEQC recently started to its new programs namely: Institutional Accreditation Program and Institutional Follow-up Program.

THEQC completed external evaluations of 160 HEIs between 2016 and 2019, hence THEQC finished the first review cycle of our higher education system. Moreover, THEQC continues to run the Institutional External Evaluation Program (IEEP) with the HEIs which are newly established or have no graduated students. Whenever these conditions change the related HEIs will be included in the IEEP. By 2020, 14 HEIs are included in this program. Currently, the evaluation teams are formed and assigned by THEQC and will perform site-visits with a blended visit approach (via using both online and face-to-face site-visit methods). Due to the pandemic, the site-visit has been postponed to the last quarter of 2020.

THEQC's Institutional Accreditation Program (IAP) has been initiated since the beginning of 2020. The program based on a rubric approach where THEQC's existing criteria are designed with maturity levels of HEIs. IAP is an external evaluation method that enables quality assurance, education, research and development, social contribution and management system processes in HEIs to be evaluated within the

scope of "plan, do, control and act (PDCA)" cycle. This year 11 HEIs are included in this program. Currently, the evaluation teams are formed and assigned by THEQC and will perform site-visits with a blended visit approach (via using both online and face-to-face site-visit methods). Due to the pandemic, the site-visits have been postponed to the last quarter of 2020.

On the other hand, Institutional Follow-up Program (IFuP) has also been initiated since the beginning of 2020. Within the scope of the program, HEIs whose Institutional External Evaluation Program (IEEP) completed are included in the IFuP at the earliest in the second year after the evaluation year. By 2020, 59 HEIs are included in this program. Currently, the follow-up teams are formed and assigned by THEQC to these HEIs. The team members were chosen among the teams that were previously evaluated the related HEI. Due to the pandemic, the site-visits of IFuP have been postponed to the last quarter of 2020 and will be conducted via online platforms and tools.

ESG 2.3: Has the agency finalised its new follow-up process model (as detailed in its SER, p.28) and if so could you please elaborate on this model, in particular on whether and how the follow-up requirement is linked to the decision on accreditation by the Council (SER p. 28)?

The new follow-up program was planned in 2019 and initiated at the beginning of 2020 under the name of Institutional Follow-up Program (IFuP). In order to carry out the IFuP, follow-up teams are formed and assigned by the THEQC from the evaluators who previously took part in the external evaluation of the relevant HEIs and prepared the Institutional Feedback Reports (IFuRs). By this way, it is ensured that, the follow-up teams are well-informed about the HEIs and experienced from their previous participation to IEEP.

Due to the pandemic, IFuP site-visits will be carried out by using online platforms and tools. Therefore, follow-up teams are trained about how to conduct online site-visits and the behavioural dimension of online meetings. The online site-visits of IFuP is going to be initiated by the beginning of November.

Currently, the IFuP is solely related with Institutional External Evaluation Program (IEEP) and 59 HEIs that were previously covered under IEEP will be included in the IFuP. IAP has just started and therefore the HEIs included in IAP will be considered for appropriate programmes in according to the accreditation decisions in the upcoming years.

HEIs whose external evaluation completed are included in the IFuP at the earliest in the second year after the external evaluation year of the relevant HEI. The purpose of the IFuP is to evaluate the improvement areas of the HEIs based on the Institutional Feedback Reports (IFuRs) as well as by considering last three years' ISERs.

After making the preliminary work on the ISERs, IFuR, performance indicators and necessary additional documents of the specific HEI, the follow-up team performs a

one-day online-site-visit. And then, the follow-up team prepares an Institutional Follow-up Report (IFuR) which will be approved and published by THEQC.

Regarding your statement "...in particular on whether and how the follow-up requirement is linked to the decision on accreditation by the Council?": IFuP is directly linked with Institutional External Evaluation Program (IEEP) and currently not with Institutional Accreditation Program (IAP) since it is just started by 2020. At this point, in IEEP no overall judgment or formal decision is made, but HEIs will use IFuRs for their self-improvement and some main stakeholders, such as CoHE, will use IFuRs to take decisions regarding HEIs' funding, HR policies, etc. As THEQC, we expect that our main stakeholders will also treat IFuRs in a similar way while giving their decisions regarding HEIs improvements. By this way, IFuP will ensure the outcomes of IEEP by closing the PDCA cycle.

ESG 2.5: Has the agency changed or developed a new system for decision making processes related to institutional accreditation? Could you further clarify what are the criteria used by THEQC in determining which higher education institutions are included in the Institutional Accreditation Programme?

Meanwhile, THEQC gave customized feedback to each HEI – particularly the ones which will be included in the IAP and IFuP – based on its Institutional Self-Evaluation Report (ISER), so that HEI could improve its internal quality assurance system and ISER writings. Depending on these customized feedback reports, THEQC identified main issues related with how to structure HEIs' internal quality assurance systems and write their own ISERs, and then organized a specific training program for HEIs. These training programs will continue in specific themes by THEQC in the upcoming years.

THEQC runs IEEP on a peer-evaluation process whereas with the IAP, a decision-making mechanism is added to the process. The accreditation is granted for 2 years, 5 years or no accreditation (supporting service will be given for the non-accredited HEIs).

By the beginning of 2020, THEQC made a call to HEIs to be volunteer for IAP and 52 HEIs applied to the call with their intention letters approved by their senates. Based on some objective criteria 11 out of 52 HEIs were chosen. The criteria are as follow:

- Inclusion in the previous years' IEEP,
- The institution's consideration of previous external evaluation,
- Customized feedback reports mentioned above previously.

ESG 2.6: Has the agency finalised any institutional accreditations in 2020 and if so are they published?

THEQC has just started the Institutional Accreditation Program. Due to pandemic, the site-visits have been continuing currently and will be completed at the end of 2020. Therefore, once the program is finalised, the Institutional Accreditation Reports (IARs) will be published on the official web site of THEQC.

ESG 3.1: Has the agency discontinued or kept its current mentorship programme intended to support the first cycle of institutional external evaluations (IEE)?

The mentorship program still continues to support the HEIs, which will be included in IEEP. By 2020, the mentors were selected via a call that THEQC announced. After the mentors were determined, they were trained and assigned to the HEIs included in IEEP-2020 by THEQC. While assigning, both mentors and HEIs had to declare conflict of interest issues, and signed Code of Ethics of THEQC. They are still continuing to their mentorship activities until the site-visits of IEEP-2020.

2. We noted that THEQC carries out evaluations (and monitoring) activities of higher education institutions within the mission differentiation and specialization project of CoHE. According to the panel this is presented as a separate report that it is not published by CoHE.

Could you please describe how are these processes developed (ESG 2.2), how are evaluators assigned to such an evaluation and what is the composition of such a panel (ESG 2.4), what are the extra set of substandards and detailed performance indicators included for these evaluations (ESG 2.3), and how are these criteria weighted (ESG 2.5)?

The evaluations of HEIs included in the mission differentiation and specialization project of CoHE were carried out in parallel with IEEP of THEQC. Thus, THEQC implemented the same processes of IEEP in line with ESG 2.2 to the HEIs in that special project.

During the implementation of the evaluation process, THEQC's Institutional External Evaluation Guide was used. Thus the process consisted of ISERs prepared by HEIs, IEEP process, IFRs and follow-up report. During the evaluation process, the teams made their regular evaluations within the scope of IEEP and also implemented the performance indicator list of CoHE for mission differentiation and specialization project (ESG 2.3).

The evaluation teams were formed and assigned according to THEQC's Institutional External Evaluation Directive and Institutional External Evaluation Guide. The evaluators were trained through THEQC's annual IEEP trainings. In addition, these evaluation teams had also informed about the scope of CoHE's project and additional performance indicator list. Thus, THEQC ensured that the teams for those HEIs' evaluations were well-informed about both with IEEP procedures and mission differentiation and specialization project (ESG.2.4).

Even though, the mission differentiation and specialization project of CoHE is still running, there is no additional request from THEQC regarding the continuance of this project. By the way, we would like to clarify something about this project. First of all, THEQC is not the owner this project, but in order to collaborate with its main stakeholder CoHE, THEQC gave support to this project by including CoHE's additional

performance indicator list. However, this additional performance indicator list was solely given to CoHE and did not have any impact on THEQC's IEEP. In other words, we have collected data from HEIs during site-visits on behalf of CoHE, but this data was examined, analysed and reported by CoHE. Therefore, CoHE is the corresponding stakeholder regarding this project.

3. We noted that on its website THEQC has published a list of Institution Indicator Reports. Could you clarify the nature of these reports. Are they linked to the IEE or to the mission differentiation and specialisation project (ESG 2.6)?

The Institution Indicator Report is a service of THEQC to HEIs to make them monitor their performances over the years. These reports include the specific group of performance indicators that can be used commonly by HEIs in order to monitor their performance results. The indicators were chosen from a variety of world-wide accepted measurement indicators and were linked with THEQC's main evaluation criteria: quality assurance system, learning and teaching, research and development, and social contribution. By this way, THEQC provides HEIs to monitor their performance results over the years.

We hope that our responses are clarifying the EQAR Register Committee's rapporteurs' questions. We also add an annex for abbreviation to this letter. For any further questions, please contact us.

Kind Regards,



Prof.Dr. Aslıhan Nasir

Member of THEQC

Annex for abbreviations:

CoHE	Council of Higher Education
EQAR	European Quality Assurance Register for Higher Education
HEI	Higher Education Institution
IAP	Institutional Accreditation Program
IAR	Institutional Accreditation Report
IEEP	Institutional External Evaluation Program
IFR	Institutional Feedback Report
IFuP	Institutional Follow-up Program
IFuR	Institutional Follow-up Report
ISER	Institutional Self-Evaluation Report
PDCA	Plan, Do, Control, Act
THEQC	Turkish Higher Education Quality Council

European Quality Assurance Register of Higher Education (EQAR)
Karl Dittrich, President, Chair of the Register Committee of EQAR
| Aarlenstraat 22 rue d'Arlon | BE-1050 Brussels

– by email: melinda.szabo@eqar.eu –

Ankara, 4 February 2021

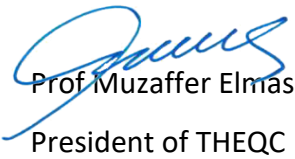
Dear Karl Dittrich,
President, Chair of the Register Committee of EQAR

The Turkish Higher Education Quality Council (THEQC) received a deferral letter from the Register Committee upon THEQC's application for inclusion on the European Quality Assurance Register (EQAR) on 9 November 2020. THEQC was informed about an invitation to make an additional representation on the matter before the Register Committee makes a final decision on its application.

The representation of THEQC was prepared on the issues that the Register Committee hesitated about the compliance level of THEQC regarding the specific items of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The following part begins with the Committee's considerations about THEQC's compliance level regarding each ESG item and then THEQC's responses and clarifications are given. Please note that the representation document also includes annexes that are submitted as evidences.

In case of further clarification, THEQC will be glad to respond your inquiries.

Yours Sincerely,



Prof. Muzaffer Elmas
President of THEQC

THEQC'S Response to EQAR's Decision on Partially Compliant Items

ESG 2.4 – Peer-review experts

18. In considering the student involvement in peer-review teams, the panel stated that each expert panel includes a student evaluator. Following a cursory glance into the institutional external evaluation reports published by THEQC on its website, the Register Committee noted that students were not always listed among the peer-review experts. The Register Committee has therefore asked the panel whether it was aware of such exceptions and whether it was given any explanation.

19. The panel explained that the involvement of students was piloted only in 2018 and that it became part of THEQC's procedure in the academic year 2019-20 (once the agency's Student Commission was set up in October 2019). The panel was assured by those that it spoke to, including the student representatives, that it was THEQC's policy to include students on all review panels.

20. The Register Committee welcomed the explanation by the panel, but noted that students were not listed as panel members in a number of evaluations carried out in 2019 (e.g. Alanya University, Atasehir University, Şırnak University, Hakkari University, Ataşehir Adıgüzel Meslek Yüksek Okulu, Muş Alparslan). As no reports were published in 2020 yet, the Committee could not determine whether the practice has indeed changed.

21. Considering the remaining questions on the systematic involvement of students in THEQC's external reviews teams, the Register Committee could not follow the panel's conclusion of (substantial) compliance but concluded that THEQC complies only partially with ESG 2.4.

THEQC's Response:

One of the council members of THEQC is the student representative who has equal rights and responsibilities with the rest of the Council members. Also, student representative of THEQC and student evaluators established the Student Commission that solely consists of students coming from different disciplines with different degrees (BA, BS, MA, MS, PhD). This commission works with the aim of increasing quality assurance awareness among students in HEIs. In addition, since 2018, students participate in the Institutional External Evaluation Program (IEEP) of THEQC by taking active roles in evaluation teams. In Annex 1, you may find the list of student evaluators who have participated in evaluation teams so far. Moreover, student members of our evaluator pool attended training programs that were designed and organized by THEQC. You may find the last evaluator training's student participants list in Annex 2. Likewise, THEQC also organized a training program specifically tailored for student evaluators as well (<https://yokak.gov.tr/theqc-organizes-student-evaluator-training-with-the-attendance-of-61-students-selected-from-heis-22>). Up to 2019, there were some cases in which student participation in evaluation teams was not actualized due to the students' excuses. Therefore, THEQC improved the process regarding student assignment to teams and by 2020 all teams were formed with student members and in case of excuses a new student member from the evaluator pool was assigned to these teams. As an evidence please check Annex 1 for the full list of student evaluators in all teams without any absence in 2020.

To increase students' visibility, a specific section was added on official website of THEQC, in which stakeholders can see student lists, directives and guidelines for the Student Commission, and announcement of student activities (Please check our official website for the 'Student Participation' section for details: <https://yokak.gov.tr/ogrenci-komisyonu/ogrenci-katilimi>). As a consequence of the Student Commission's efforts, two of the Student Commission members were elected to ESU's Student Experts Pool on Quality Assurance. The Student Commission also organized a series of Webinars on Student Involvement in QA activities (Annex 3). As a result, the THEQC assured the systematic involvement of students in all external evaluation teams by improving the process.

Besides student participation, THEQC also formed international experts' pool to be involved in the institutional evaluation teams. For this purpose, THEQC made a call for international experts, which was published on both ENQA's and THEQC's official websites as well as their social media platforms. As a consequence, THEQC carried out training programs for the selected international experts (Annex 4), and then assigned international evaluators to the IAP evaluation teams for 2020. Currently, THEQC has 68 international evaluators in the pool, which includes also international student evaluators. By this way, THEQC has been implementing ENQA review panel's recommendation.

Annex 1: List of student evaluators from 2018 to 2020

Annex 2: Students that attended to THEQC's training on March 2020 in Antalya.

Annex 3: Student Commission webinar series (<https://yokak.gov.tr/yuksekogretim-kalite-kurulu-ogrenci-komisyonu-tarafindan-ogrencilere-yonelik-kalite-elcisi-ogrencil-135>)

Annex 4: International peer review experts' calls and evaluator training news

<https://yokak.gov.tr/theqc-launches-call-for-international-evaluators-157>

<https://enqa.eu/index.php/theqc-turkey-launches-call-for-international-experts/>

ESG 2.5 – Criteria for outcomes

22. The panel observed during its review that the maturity level gradings are not published by THEQC in either the institutional self-evaluation reports (ISR) nor in the institutional feedback reports (IFR).

23. In its statement to the review report, THEQC stated that the maturity levels have since January 2020 been included in all reporting activities.

24. The Committee could verify that indeed the full criteria, including the maturity levels for institutions, are now published by THEQC on its website.

25. The panel further commented that the same categories of criteria are used for the mission differentiation and specialization project, but that some additional performance indicators are added to them. The Committee took note that these additional performance indicators are not made public.

26. THEQC explained (see clarification letter) that it did not have ownership over the mission differentiation and specialization project, and that the additional indicators were specifically used by the Council for Higher Education (CoHE) to prepare their analysis on a number of state universities. The Register Committee, however, underlined that the agency maintains responsibility for transparency and compliance with the standard also when it implements a third-party process; it is THEQC's responsibility to only accept carrying out such activities where it can ensure compliance with the ESG and THEQC is thus expected to assure that such indicators are published.

27. In reviewing the consistency in the application of criteria for institutional external evaluations and the assessment by maturity levels, the panel found they were not clearly defined and explained in the evaluation related documents. The Committee however noted from the agency's statement to the review report that the maturity levels of institutions against the THEQC criteria has been reorganized to be more explicit and specific and that it had been already included in reporting activities starting with 2020.

28. In the context of the new institutional accreditation process the panel commented that THEQC might consider developing and implementing a new assessment system, based on an approach more suitable for a decision-making process related to accreditation. The Register Committee has therefore asked the agency to clarify whether it has revised its criteria and its system for decision-making in its transition to institutional accreditations.

29. In its clarification letter THEQC explained that the Institutional Accreditation Programme (IAP) was recently initiated, that the agency had so far selected 11 higher education institutions that will undergo this procedure and that it was in the process of appointing evaluation teams. Due to the pandemic the accreditation procedure has been delayed to the last quarter of 2020. In terms of decision making, the agency explained that it intends to grant accreditation valid up to 5 years or a provisional accreditation

valid up to 2 years. At the same time, despite procedures having been initiated, no criteria have been published to date.

30. THEQC further explained that it continues to still run the Institutional External Evaluation Program (IEEP) for higher education institutions that have been newly established or have no graduate students.

31. The Register Committee underlined that the agency is expected to publish the criteria for each of its activities before any evaluation/accreditation is performed, including the new IAP criteria (even if the activity is just being launched) and the additional performance indicators under the mission differentiation and specialization project.

32. Given that the agency does not publish criteria for key activities, the Register Committee could not follow the panels conclusion of (substantial) compliance, but considered that the agency complies only partially with ESG 2.5.

THEQC's Response:

THEQC started the revision of its criteria in 2019 and decided to evolve its Institutional External Evaluation Program (IEEP) into the Institutional Accreditation Program (IAP). In 2019, the HEIs and the THEQC evaluators' were made aware of the revision of the processes for the upcoming year. The presentation of the new program (IAP) was done during the meetings and workshops with the stakeholders. Besides, THEQC received opinions and feedback from international experts, consultants, evaluation team leaders and rectors of HEIs. On its meeting in 2019 (04.12.2019 /2019-10; Annex 5), the Council decided on the revised version of criteria and guidelines which were taken into action for IEEP and IAP in 2020. Subsequently, it was announced on THEQC's official website on 09.12.2019 (<https://yokak.gov.tr/kurumsal-dis-degerlendirme-ve-akreditasyon-olcutleri-surum-20-ve-kurum-ic-degerlendirme-raporu-k-87>). This revised version was named as "Institutional External Evaluation and Accreditation Criteria" and it is valid for ISERs, IEEP, IAP and IFuP. Quality Commissions of HEIs were trained about this revised version through a series of workshops on 29.01.2020 - 04.02.2020 - (Annex 6) and it was expected from them to prepare their 2019-ISERs accordingly (The 2019-ISERs of HEIs were submitted on March 2020). Likewise, THEQC's evaluators were trained about these revised evaluation and accreditation criteria and processes on 05-07.03.2020 (<https://yokak.gov.tr/yokak-2020-yili-kurumsal-dis-degerlendirme-ve-akreditasyon-programi-degerlendirici-egitimi-5-7-mart--115>). Hence, THEQC supported the deployment of these criteria and guidelines in HEIs and evaluation teams. The HEIs that were included in IEEP, IAP and IFuP were determined and informed officially by June 2020 (Annex 7). The institutional evaluation and accreditation teams were determined and assigned to HEIs by the beginning of September 2020 whereas institutional follow-up teams were assigned by the end of October 2020 (please see Annex 7 for the sample official letters to HEIs and evaluators signed electronically by the THEQC's president).

THEQC employed the rubric model as an assessment approach to its already existing evaluation criteria for the areas of quality assurance system, learning and teaching, research and development, governance system. "**Service to society**", formerly considered a sub-criteria under the main areas, became the 5th main evaluation area. In addition, "**internationalization**" has become more visible since a special emphasis has been made by including it as a criterion under the area of quality assurance system. As a result, these five main areas are composed of 22 criteria and 58 sub-criteria with the rubric assessment approach. On the other hand, in order to clarify each criterion and sub-criterion, THEQC also published a "Sub-Criteria Guide" for HEIs and evaluation teams. It should be noted that the evaluation criteria and guidelines are valid for all of the programs i.e. IEEP, IAP and IFuP, and utilized in all reports including ISERs and IFuRs, IARs.

In conclusion, it should be noted that the evaluation criteria are commonly valid for all of the programs i.e. IEEP, IAP and IFuP and each program has been concretely determined by guidelines. Furthermore, in

the light of the provided evidence, THEQC published and deployed the criteria for all of its activities before any evaluation/accreditation was performed, including the new IAP.

In accordance with the recommendation of the ENQA Panel and EQAR Register Committee, the additional performance indicators under the mission differentiation and specialization project was published on the official website of THEQC (<https://yokak.gov.tr/raporlar/misyon-farklilasmasi-raporlari>)

Annex 5: THEQC's decision on the new version of institutional external evaluation and accreditation criteria and guidelines

Annex 6: Webinar 1: <https://yokak.gov.tr/yokak-tarafindan-2019-yili-kurum-ic-degerlendirme-raporlarinin-hazirlanmasina-yonelik-olarak-cevrimi-105>

Webinar 2: <https://yokak.gov.tr/theqc-organizes-second-webinar-on-iser-writing-process-109>

Annex 7: Sample official letters to HEIs and for evaluators

ESG 2.6 – Reporting

33. The Register Committee noted that the results of the institutional external evaluation (ISER and IFR) are published by THEQC on its website. The Committee could not find any institutional accreditation reports published and therefore asked the agency to clarify if any reviews have been finalised with the new procedure in 2020.

34. The agency explained that the Institutional Accreditation Programme has been delayed due to the pandemic (see also ESG 2.5) and expected that the accreditations would be resumed at the end of 2020, following which the institutional accreditation reports would be published.

35. Considering the consistency of institutional external evaluation reports (ISER and IFR) the panel formed the view that this was not systematically ensured. While the agency has taken in the recommendation of the panel to include the maturity level grades as part of these reports (see also under ESG 2.5), the Committee underlined the panel's recommendation on the need to also introduce mechanisms to ensure consistency not only of the structure of the reports but also of the in-depth analysis they provide.

36. The Committee noted that THEQC's separate reports produced as part of the mission differentiation and specialization project are not published by neither THEQC nor CoHE (see also under ESG 2.5).

37. While the reports are commissioned by CoHE, the Committee underlined that the agency still has responsibility for compliance with the ESG and thus of ensuring that the full reports resulting from its external quality assurance activities are published.

38. Considering the lack of publication of the mission differentiation project results and the remaining issues regarding the consistency in THEQC's reporting, the Register Committee concurred with the panel's conclusion that the agency complies only partially with ESG 2.6.

THEQC's Response:

THEQC conducted mission differentiation and specialization project **only once** upon the request of its main stakeholder CoHE, and after the Committee's recommendation, the reports of this project for **that year** were published on THEQC's official website (<https://yokak.gov.tr/raporlar/misyon-farklilasmasi-raporlari>). In addition, CoHE still continues this project and annually announces the results on its website (<https://www.yok.gov.tr/Sayfalar/Haberler/2020/yok-ten-arastirma-ve-aday-arastirma-universiteleri-degerlendirilmesi.aspx>). As there is no clear indication at ESG regarding the publishing of ad-hoc reports which are not under the main responsibility of agencies (for instance those just as a collaboration on quality assurance with stakeholders), THEQC did not publish this ad-hoc project's report but after the recommendation of the Committee, the report for mission differentiation and specialization project has been published on THEQC's website. In addition, CoHE publishes a compilation of these reports, and announces the results on a yearly basis (please check the following websites for the latest announcements

<https://www.yok.gov.tr/Sayfalar/Haberler/2020/yok-ten-arastirma-ve-aday-arastirma-universiteleri-degerlendirilmesi.aspx> and <https://bolgeselkalkinma.yok.gov.tr/>).

By the end of 2020, the Institutional Accreditation Program (IAP) has been completed only for one HEI out of 11 due to the pandemic, and as of February 2021, THEQC will begin to publish its final reports of IAP for those HEIs (calendar for site visits of IAP, IEEP, and IFuP are available on the website: <https://yokak.gov.tr/degerlendirme-sureci/DisDegerlendirme-Yapilacak-Universitelerin-Ziyaret-Tarihleri>).

It should also be noted that the online platform of THEQC provides access to annual ISERs of HEIs as well as their IFRs. Likewise, every HEI has to publish their own annual ISER and IFR (as part of the external evaluation they should undergo at least once every five years) on their official websites, which is an obligation by law. Similarly, based on these reports (ISERs and IFRs), THEQC publishes Annual Situation Reports and organizes several meetings with Quality Commissions of HEIs, evaluation team members, and rectors of HEIs to give annual feedback about the areas that are in need of improvement as well as the strengths of HEIs. Finally, based on these reports and feedback from related stakeholders, THEQC makes a needs-analysis and then designs and organizes training programs accordingly. As a result, THEQC assures the reporting and publishing of results of all its key activities as well as the recording of all actions via special information system.

The results of the consistency analysis of the rubric approach were not finalized during the Panel's site visit. The first consistency analysis was performed during the development of the rubric approach, in which we have conducted content validity by asking 9 expert's opinions regarding each sub-criteria. It was observed that all of the experts agreed on the fitness of all the sub criteria in terms of understandability, measurability, and distinctiveness principles. Hence, the content validity was obtained, and the report was finalized in October 2019. Upon your request, THEQC can share this report with you.

Parallel to content validity of the rubric approach as a tool, THEQC performed consistency and usefulness analysis on the rubric approach as well with different stakeholders including evaluators (<https://yokak.gov.tr/yokak-2020-yili-kurumsal-dis-degerlendirme-ve-akreditasyon-programi-degerlendirici-egitimi-5-7-mart--115> ; <https://yokak.gov.tr/kurumsal-dis-degerlendirme-ve-akreditasyon-programi-degerlendirici-egitimi-e-ogrenme-platformu-uzer-133>), quality commissions and rectors of HEIs (<https://yokak.gov.tr/yuksekgretim-kurumlari-kalite-komisyonlarina-yonelik-cevrilimi-egitim-serisinde-600-uzerinde-katili-158>), and international experts (<https://yokak.gov.tr/yokak-uluslararasi-uzmanlar-prof-dr-ivan-leban-ve-ronny-heintze-in-katilimiyla-kurul-toplantisi-g-85> ; <https://yokak.gov.tr/us-based-ga-experts-prof-dr-douglas-franklin-and-prof-dr-teresa-franklin-visit-theqc-111> ; <https://twitter.com/ykalitekurulu/status/1222454055106203651>). As a consequence, satisfactory levels of consistency and usefulness for the rubric approach were observed based on analysis of different stakeholders (e.g. the consistency level among 265 evaluators regarding the rubric approach was 97%). In addition, the academic experts of the Council also examined the ISERs of 55 HEIs (chosen according to geographical location and establishment year) and observed whether the rubric approach was implemented accurately by HEIs. Hence, before site visits, both validity and consistency of the rubric approach were meticulously observed by the academic experts of the Council.

ESG 2.7 – Complaints and appeals

39. The Register Committee noted from the panel's analysis that the agency's appeals and complaints processes have not been clearly defined.

40. The panel stressed that as the agency moves towards an institutional accreditation process, it will need to re-evaluate its current processes for both complaints and appeals.

41. The Committee noted that the agency does not have a body to handle appeals as they are considered by the Council in consultation with the IEE Commission. The Register Committee underlined the panel's recommendation to develop a new mechanism for dealing with complaints and especially appeals so as to allow for a degree of independence from the Council and in order to avoid any conflicts of interest.

42. Considering the lack of development of the appeals and complaints processes and the concerns related to the independence of the Council in handling appeals the Register Committee concurred with the conclusion that THEQC complies only partially with ESG 2.7.

THEQC's Response:

THEQC has defined the appeals and complaints procedures for all programs as an institutional policy and published the appeals/complaints procedures within the guidelines of each program. In addition, there is an information system of THEQC specifically designed for receiving complaints regarding all processes from all stakeholders and responding to them immediately (<http://kurumsalkalite.yokak.gov.tr/en>). This system is also accessible in the section named Feedback Management System and Complaints and Appeals System on the official website of THEQC.

In order to improve the visibility of the appeals and complaints procedures, THEQC redesigned its web page and grouped all procedures together on the related section of the web page (www.yokak.gov.tr 'Complaints and Appeals Icon'). THEQC has recently published the Directive of Complaints and Appeals in order to regulate the procedures and principles regarding the processes of complaints and appeals. (Annex 8)

Annex 8: THEQC's Directive of Complaints and Appeals

ESG 3.1 – Activities, policy and processes for quality assurance

43. Considering the mentorship programme run by the agency, the Register Committee noted the panel's concerns related to the possible conflict of interest of such experts providing support to institutions.

44. Considering THEQC's shifts towards institutional accreditation and the panels' recommendation to ensure that any conflict of interest is avoided in this new activity, the Committee has therefore asked the agency whether it has kept or discontinued its mentorship programme.

45. The agency explained, in its clarification letter, that the mentorship programme is a feature of the institutional external evaluation programme, which is still ongoing. The agency added that for the institutional external evaluation in 2020 the agency launched a call for mentors, and that mentors are requested to declare conflict of interest when assigned to an institution, and to sign a Code of Ethics as well.

46. The Committee also noted the panel's concerns considering the lack of stakeholder involvement in the design of methodologies and other related documents, which are only discussed by the Council.

47. The panel analysis further shows that the participation of students is limited compared to that of other Council members, as no student was included in any of the Council's commissions.

48. Considering the substantial concerns expressed by the panel with regards to the mentorship programme, the lack of stakeholder involvement and the limited involvement of students in the governance of the agency, the Register Committee could not follow the panels' conclusion of compliance, but considered that THEQC complies only partially with ESG 3.1.

THEQC's Response:

The main motivation to implement the mentorship programme was to give guidance to HEIs about preparing their documents, writing their ISERs, and to make them get familiar with the IEEP process, which was relatively a new approach during the initial years. In other words, the mentorship programme was specifically designed for the Institutional External Evaluation Program (IEEP) in order to support the

internalization of quality assurance culture in HEIs. During the first implementation, the IEEP adopted a friendly approach for the initial evaluations by taking into account the conflict of interest issue. As all HEIs that have graduates were evaluated, the quality assurance system has reached to a certain maturity level and evolved into a second phase in which THEQC has just begun to conduct the Institutional Accreditation Program (IAP). Currently, the mentorship programme is **only active** for the IEEP of HEIs that **do not have graduates yet or are newly established** (<https://yokak.gov.tr/criteria-and-deadline-for-external-evaluation-programme-mentorship-applications-updated-93>). Since THEQC's decision includes an **accreditation decision** in IAP, THEQC does **not implement its mentorship programme for the IAP** in order to prevent any conflict of interest.

Students are actively participate in the activities as well as the decisions of the commissions of the THEQC, particularly in the Commission of Institutional External Evaluation and in the Commission of International Relations (please check our website for these commissions for the student member lists: <https://yokak.gov.tr/hakkinda/komisyonlar>).

ESG 3.3 – Independence

49. The panel noted that THEQC's operational independence is affected by the key role played by experts and consultants, who serve as the agency's professional staff but remain employed and on the pay-roll of higher education institutions; as this could constitute a conflict of interest.

50. The analysis of the panel showed that the current organizational structure of the agency affects the independence of its operations and formal outcomes since there is a potential for conflicts of interest to arise regarding the different roles played by the Councils' members (see also ESG 2.7).

51. The agency responded in its statement to the review report that THEQC had increased the number of permanent employees (4 new full-time employees started working for the Council in 2020). The agency also stated that its organisation structure is defined by law, but it has nevertheless conveyed the recommendation related to THEQC's organizational structure to relevant authorities.

52. The Register Committee welcomed THEQC's initial steps in increasing the number of permanent staff, but underlined that as long as THEQC is still heavily relying on experts and consultant that are on the payroll of higher education institutions the panel's concern related to its operational independence is not fully addressed.

53. The Register Committee therefore concurred with the review panel that THEQC complies only partially with ESG 3.3.

THEQC's Response:

As indicated by the Register Committee, THEQC's employment procedures are defined by law, which is binding for all public institutions and organizations in Turkey, including THEQC. Despite this stringent factor, THEQC continues its endeavours to increase its number of permanent full-time employees and improve its organizational structure in consideration of the recommendations of the panel and the Register Committee and in line with its efforts of complying with ESG. In this framework, new employees have been recruited since the submission of the THEQC's Self-Assessment Report addressing the ENQA Review Panel and clarification letter addressing the EQAR Register Committee. As of January 2021, the number of employees in THEQC has increased to 35. With the increase in the number of employees, the number of employees assigned in the Commissions coordinated by THEQC members has also increased, thus reframing the duties and responsibilities of the Council members. In line with the recommendations of the ENQA panel, the organizational structure of the commissions were sketchily illustrated under three categories as council members, staff and students (<https://yokak.gov.tr/hakkinda/komisyonlar>, and also available at Annex 9).

Annex 9: Staff assigned to the Commissions and the work-flow-chart of the Commissions

ESG 3.5 – Resources

54. According to the panel's analysis the assignation of the budget has not been made considering the agency's real financial needs and its Strategic Plan for 2019-2023. The panel added that the budget remained underspend although most of the agency's staff (experts and consultants) are assigned by HEIs and are not paid by THEQC.

55. The panel further expressed concern regarding the sustainability of agency's processes as they do not rely on permanent professional staff, but almost entirely on the 'voluntary' nature of the work of evaluators and staff of the agency.

56. In its statement to the review report THEQC responded that it had made its budget plan within the scope of Strategic Planning in Public Institutions, following the Law on Public Finance Management and Control (No. 5018). The agency added that the strategic plan also includes a budget, which can be provided at request.

57. In its statement to the review report the agency stated that it has been improving the balance between permanent staff and the staff assigned from other institutions, i.e. two employees assigned from HEIs returned to their home institutions while four new full-time employees started working for the Council in 2020 (see also ESG 3.3).

58. While the Register Committee noted that the agency has taken some steps into the right direction, the Committee nevertheless concluded that at the moment the agency's human resources have not been sufficiently addressed.

59. The Register Committee therefore concurred with the review panel that THEQC complies only partially with ESG 3.5.

THEQC's Response:

As stated under the title of "ESG 3.3 - Independence", THEQC endeavours to improve its human resources. As THEQC points out in its Self-Assessment Report submitted to ENQA, the number of employees were 23 as of June 2019, which has increased to 35 by January 2021. There has been a considerable rise especially in the number of permanent staff. While the number of faculty members increased from 13 to 14, the number of permanent employees increased from 10 to 21. Likewise, with THEQC's initiatives in 2020, the personnel cadres open for 2 civil servants were replaced by 2 cadres for experts (Annex 10), who will be employed in 2021. As another initiative, THEQC has requested 23 permanent personnel cadres from the Presidency of the Republic of Turkey Human Resources Office. (Annex 11).

Annex 10: Official Gazette 31345/25.12.2020, page 60

Annex 11: Official letter of the staffing transactions to Presidency Directorate of Administrative Affairs

ESG 3.6 – Internal quality assurance and professional conduct

60. The Register Committee noted THEQC's recent development of an internal quality assurance system, in line with the results of the Plan-Do-Check-Act methodology and the 2019-2023 Strategic Plan.

61. While the panel commended the use of platforms and on-line tools for the implementation of the internal quality assurance system and the dissemination of relevant information, the panel found a number of issues that remained to be addressed in order for the quality assurance system to foster continuous improvement, i.e. existing confusion amongst staff, experts, consultants and permanent staff regarding their responsibilities in internal quality assurance matters, the lack of any corrective measure if an evaluation team were to fail to complete its task with the production of a satisfactory report.

62. The Register Committee found that the identified issues raised strong concerns about the effectiveness of THEQC's internal quality assurance system. The Register Committee could therefore not follow the panels' conclusion of compliance, but considered that THEQC complies only partially with ESG 3.6.

THEQC's Response:

In order to clarify of the Register Committee's comment on staff, experts, consultants and permanent staff regarding their responsibilities in internal quality assurance matters, THEQC presents an organizational work-flow-chart with this additional representation document (Annex 9). The Council, the Commissions and the General Secretariat are the senior bodies of the THEQC. The units linked to the General Secretariat are responsible from the administrative works of the Council while the staff responsible for commission activities perform the tasks of the commissions in line with the opinions and recommendations of the Council members who take part in the relevant commissions.

By using internal quality assurance system, THEQC continuously improves all processes and services. For example; in order to clarify the Register Committee's concern on the lack of any corrective measure if an evaluation team were to fail to complete its task with the production of a satisfactory report, THEQC's corrective mechanisms can be listed as follows:

- Before the submission of the final version of IFR/IAR to THEQC, the draft report is sent to the related HEI for the correction of factual mistakes by the team, after that the team and the HEI come to an agreement on the final version of IFR/IAR.
- In addition, THEQC receives the opinions of related HEI and team members on the conduct of the external evaluation and accreditation processes. If there is any negative comment on a team member, THEQC either changes his/her team in the upcoming year or does not assign him/her in a team in the following evaluation processes.

Additional Information on THEQC's Institutional Accreditation Program

Institutional Accreditation Program (IAP) is an external evaluation method that enables the evaluation of quality assurance, learning and teaching, research and development, service to society and management system processes in HEIs within the scope of the PDCA cycle. The most important distinction between IAP and Institutional External Evaluation Program (IEEP) is that IAP includes a decision regarding accreditation. It is expected that HEIs will transform into continuously developing organizations as a concrete decision will be given regarding the maturity status of the institution for the aforementioned areas at the end of the IAP. By concrete decisions what is meant can be summarized as follows: full accreditation (for five years), conditional accreditation (for two years) or to support the HEIs, which show maturity below a certain level, in the context of quality assurance applications.

Every calendar year HEIs to be included in the IAP are determined by the THEQC and evaluation teams are assigned with the experts from THEQC's evaluator pool. Two visits (preliminary visit and site visit) are made to the relevant HEIs by these teams. The evaluation teams formed by THEQC within the scope of Institutional External Evaluation and Accreditation Criteria and Institutional External Evaluation and Accreditation Guide. After the site visit Institutional Accreditation Reports (IAR) are prepared by the evaluation teams and the decision regarding the accreditation is made by THEQC by taking these reports into consideration and shared with the public.

The documents used for the IAP are as follows and are available on THEQC's official website (<https://yokak.gov.tr/degerlendirme-sureci/kurumsal-degerlendirme-programi-dokumanlar>):

- Turkish Higher Education Quality Council Institutional External Evaluation Directive
- Institutional Self- Evaluation Report Preparation Guide (Version 2.0)
- Institutional External Evaluation and Accreditation Criteria (Version 2.0)
- Institutional External Evaluation and Accreditation Guidelines (Version 2.0)

List for abbreviations:

<i>CoHE</i>	Council of Higher Education
<i>ENQA</i>	European Association for Quality Assurance in Higher Education
<i>EQAR</i>	European Quality Assurance Register for Higher Education
<i>HEI</i>	Higher Education Institution
<i>IAP</i>	Institutional Accreditation Program
<i>IAR</i>	Institutional Accreditation Report
<i>IEEP</i>	Institutional External Evaluation Program
<i>IFR</i>	Institutional Feedback Report
<i>IFuP</i>	Institutional Follow-up Program
<i>IFuR</i>	Institutional Follow-up Report
<i>ISER</i>	Institutional Self-Evaluation Report
<i>PDCA</i>	Plan, Do, Control, Act
<i>THEQC</i>	Turkish Higher Education Quality Council

List for annexes:

- Annex 1** List of student evaluators from 2018 to 2020
- Annex 2** Students that attended to THEQC's training on March 2020 in Antalya.
- Annex 3** Student Commission webinar series (<https://yokak.gov.tr/yuksekogretim-kalite-kurulu-ogrenci-komisyonu-tarafindan-ogrencilere-yonelik-kalite-elcisi-ogrencil-135>)
- Annex 4** International peer review experts' calls and evaluator training news
<https://yokak.gov.tr/theqc-launches-call-for-international-evaluators-157>
<https://enqa.eu/index.php/theqc-turkey-launches-call-for-international-experts/>
- Annex 5** THEQC's decision on the new version of institutional external evaluation and accreditation criteria and guidelines
- Annex 6** Webinar 1: <https://yokak.gov.tr/yokak-tarafindan-2019-yili-kurum-ic-degerlendirme-raporlarinin-hazirlanmasina-yonelik-olarak-cevrimi-105>
Webinar 2: <https://yokak.gov.tr/theqc-organizes-second-webinar-on-iser-writing-process-109>
- Annex 7** Sample official letters to HEIs and for evaluators
- Annex 8** THEQC's Directive of Complaints and Appeals
- Annex 9** Staff assigned to the Commissions and the work-flow-chart of the Commissions
- Annex 10** Official Gazette 31345/25.12.2020, page 60
- Annex 11** Official letter of the staffing transactions to Presidency Directorate of Administrative Affairs