

**Approval of the Application
by Valencian Agency for Assessment and Forecasting
(AVAP)
for Inclusion on the Register**

Register Committee
2-3 March 2023

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Application of:	2021-03-04	
External review report of:	2022-06-22	Submitted: 2022-07-13
Type of review:	Full	
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)	
Review panel members:	Achim Hopbach, Asnate Kažoka, Leander Gussmann, Marisol Morales-Ladrón	
Decision of:	2023-03-03	
Registration until:	2027-06-30	
Absented themselves from decision-making:	none	
Attachments:	<ol style="list-style-type: none"> 1. Eligibility clarification minute, 2021-03-23 2. External Review Report, 2022-06-22 (external document) 3. AVAP Improvement Plan 2022-2023 4. Minuted clarification by AVAP, 2022-10-10 5. AVAP Additional Representation, 2023-01-27 	

1. The application of 2021-03-04 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2021-03-31 having considered clarification received from AVAP on 2021-03-23.
3. The Register Committee considered the external review report of 2022-06-22 on the compliance of AVAP with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered AVAP's Improvement Plan of 2022-2023.
5. The Register Committee sought and received further clarification from AVAP on 2022-10-10.

6. The Register Committee invited AVAP to make additional representation on the grounds for possible rejection on 2022-10-25. The Register Committee considered AVAP's additional representation on 2023-03-03.

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Analysis:

7. In considering AVAP's compliance with the ESG, the Register Committee took into account:

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- *Authorisation of new programmes*
- *Follow up of study programmes*
- *Study programmes certification renewal*
- *Support Programme for the Evaluation of Teaching Activity (DOCENTIA) in collaboration with ANECA*

8. If registered on EQAR, AVAP would become eligible to perform:

- *Verification of new study programmes*
- *Evaluation, assessment, certification and accreditation of university institutions*
- *Take the final decision in the case of authorisation of new programmes (currently performed by ANECA¹)*
- *Carry out the review of modification of study programmes (currently performed by ANECA).*

9. As none of these activities are carried out so far, they were not subject to the review panel's analysis. The Register Committee underlined that AVAP is requested to make a Substantive Change Report for each new activity when it is rolled out.

10. The Register Committee found that the report provides sufficient evidence and analysis on AVAP's level of compliance with the ESG.

11. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.2 – Designing methodologies fit for purpose

12. The Register Committee noted that the review procedures carried out in the different autonomous communities of Spain follow a commonly agreed framework. While these procedures are generally adapted to each region, the panel's analysis showed that **AVAP does not take an active role in initiating consultations with regional stakeholders or developing such methodologies. AVAP's involvement is limited to a formal approval process done by its Steering Committee, with no discussion being held on methodologies.**

13. The Committee however learned that AVAP was planning to establish a separate body that will be in charge of designing and approving regulations,

¹National Agency for the Quality Assessment and Accreditation of Spain (ANECA)
<https://data.deqar.eu/agency/12>

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protocols, guides and methodologies and therefore asked the agency for further clarifications. AVAP explained (see minuted clarification of 2022-10-10) that the previously named Accreditation Commission will transform into a new body named 'Protocols and Appeals Commission', changing its functions from taking decisions on accreditation, to a new role in reviewing and validating QA regulations and considering appeals to the reports issued by the External Evaluation Committee.

14. The Committee noted that in addition to the current members, the new 'Protocols and Appeals Commission' has a student member.

15. In its additional representation AVAP stated that it has now established the Protocols and Appeals Commission, that the updated protocols have been previously communicated to its stakeholders and are now published on its website.

16. Having considered the representation and the work of the Protocol and Appeals Commission the Register Committee now concurred with the panel's conclusion that AVAP complies with the standard.

ESG 2.4 – Peer-review experts

17. In its analysis the review panel addressed the lack of student panel members nominated in the authorisation of new programmes.

18. The Register Committee further noted from the panel's analysis that the status of student as equal expert in review procedures was undermined as their task predominantly covered organisational and administrative aspects. The panel further noted that the training of experts happens in an ad-hoc or individual basis.

19. In its clarification letter AVAP explained that it has set out provisions in its QA Protocol to ensure AVAP engages in a regular training of experts.

20. In its additional representation AVAP stated that the follow-up procedure is not a free standing procedure, but that AVAP carries out a monitoring **programme for official university degrees in the Valencian Community following a procedure regulated by Royal Decree. The Committee understands by free standing procedure any form of external quality assurance activity that follows its own procedure, irrespective on whether it is regulated by a legal framework or not. The Committee however noted from AVAP's updated protocols² that the composition of such follow-up committees includes a student member.**

21. The Committee could further verify that all AVAP's commissions include a student representative in the review for all types of procedures, including for the activity authorisation of new programmes. The Committee took note that following the change of the protocol, the role of the student member has been redefined and that the administrative role of student in the Panel

² Regulations Governing the Organization and Operation of the Follow-Up Committee <https://avap.es/wp-content/uploads/2023/01/ROF-Comite-de-Seguimiento-en-GB.pdf> p. 3.

(including the different assignment for each panel member) is now removed. The Committee noted that the protocols clearly set out that students are equal panel members in the review and reporting process carried out by AVAP.

22. The Committee further took note that AVAP set out a regular training of experts and that one such session was carried out in early February 2023.

23. Considering that the issues raised by the panel under standard 2.4 are no longer a concern, the Committee finds that AVAP now complies with this standard.

ESG 2.5 – Criteria for outcomes

24. The Register Committee noted that while AVAP has published its criteria and guidelines for all assessment procedures, that the agency does not have any written bylaws that would regulate the decision-making process and the work of AVAP's decision-making committees (see also under ESG 3.3).

25. The panel's finding further show that the change made by the decision-making bodies of AVAP on the content of experts' reports went beyond the correction of technical issues, and that these changes were not documented by the agency. The Committee further noted the informal nature of the internal mechanisms for ensuring consistency and agreed with the panel on the risk posed in ensuring the consistency of outcomes in such assessment procedures.

26. In its representation, AVAP provided an explanation on its new bylaws that regulate the decision making process and review procedure. The changes ensure that the review panel report is now public and cannot be modified by other bodies. The Committee further notes that that the document does not include any specific written principles on how the decisions are taken.

27. The Committee welcomed the new procedures for approval of reports and decision making but underlined that the mechanisms for ensuring consistency in the use of criteria are limited and should be further documented in the next external review of the agency. The Register Committee therefore remained unable to concur with the panel's conclusion, but considered that AVAP complies only partially with the standard.

ESG 2.7 – Complaints and appeals

28. The review panel noted that AVAP has established a mailbox for receiving complaints and suggestions, but noted that this should be communicated more and also refer to AVAP's methodologies for assessment.

29. The Committee learned that a new body is expected to be set up to consider all the agency's appeals i.e. the Protocols and Appeals Commission (see also ESG 2.2) and that AVAP's QA Protocol would be updated to include provision for recording factual errors, information re. the standard period of

addressing appeals and the functioning of the Protocols and Appeals' Commission.

30. In its representation the agency provided the full documentation on its new internal provision for complaints and appeals and the functioning of its new appeals' body. The Committee noted that the Protocols and Appeals Commission is now operative and that the accreditation process is the responsibility of AVAP's evaluation commissions.

31. The Committee further noted that AVAP's QA protocol clearly defines the process for complaints (dissatisfaction with the conduct of the process or those carrying it out) and the process for appeals (to challenge the formal outcome), and that the process to receiving complaints has been improved (see also ESG 3.6).

32. The Register Committee finds that the concern raised by the panel have now been addressed. The Committee therefore concluded that AVAP now complies with standard 2.7.

ESG 3.1 – Activities, policy and processes for quality assurance

33. The panel notes that AVAP's evaluation protocols clearly foresee the student involvement in all decision-making bodies, but the Register Committee noted that the composition of the Commission as announced on the AVAP website did not include a student member. The Register Committee understood from AVAP's clarification (of 10/10/2022) that a call was made for the appointment of a student member and that the student is expected to be an active member of the Commission as of 15 November 2022.

34. The Committee noted that AVAP's website has now been correctly updated to reflect that a student is a member of all the Committees including AVAP's Commissions. The Committee further welcomed the consultation of student representatives of all Valencian universities through its "Student Commission" body.

35. The Register Committee considered that the issue of stakeholder representation has been addressed and therefore could now follow the panel's conclusion that AVAP complies with the standard 3.1.

ESG 3.3 – Independence

36. The Register Committee notes that the overall setup of the agency provides the Regional Government with a large influence in the governance and operation of AVAP: the operative decisions are mainly taken by the Executive Committee which consists of six members, three of them being the representatives of the Regional Government, and the proposal for Director comes from the Regional Government.

37. The Committee underlined the panel's recommendation to reduce the dominant role of the Government representatives in AVAP's governance, notably the Executive Committee; to revise the appointment procedure of the

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Director and to develop and publish clear selection principles and application procedure for composing collegial decision-making bodies.

38. In its additional representation, AVAP explained that all technical decisions and assessments of study programmes are taken by the technical bodies that are not influenced by the Regional Government. The agency added that it has nevertheless initiated a legal process for reducing the number of local Governmental representatives in its steering bodies.

39. The Committee welcomed the process initiated by the agency to address the panel's concern, but underlined that concrete changes are yet to be implemented. The Committee therefore concurs with the panel's judgments that AVAP complies only partially with standard 3.3.

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ESG 3.4 – Thematic analysis

40. The review panel stated that AVAP had conducted meta-analyses of their review activities before the pandemic but discontinued this practice. As part of REACU, AVAP also carried out structured analyses of the situation of the university system.

41. In its clarification call, AVAP explained that it has set up an Observatory of Employment to develop its own regional thematic analysis. The agency added that it is also carrying out foresight analysis of new technological and scientific studies of relevance to the Valencian Community. The agency stated that its next thematic analysis is expected to be published on June 2023 (on the topic of “Environmental Sciences”).

42. The Committee noted from the additional representation that AVAP has clearly articulated on its website the understanding on the nature and role of thematic evaluation and that the above mentioned study is underway.

43. While the Committee welcomed the collaboration with other Spanish QA agencies in this area, the Committee underlined that AVAP is further expected to ensure that its thematic analyses are conducted regularly.

44. The Committee therefore concurs with the panel's judgments that AVAP complies only partially with ESG 3.4.

ESG 3.6 – Internal quality assurance and professional conduct

45. The Committee noted that, apart from a collection of process descriptions, AVAP does not have a sufficiently well developed quality handbook or a similar document that would describe the roles and responsibilities of everyone involved in AVAP's activities and define AVAP's internal indicators for quality. The Register Committee learned (see minuted conversation) that the Quality Handbook is intended to be updated after the adoption of the QA protocol to address these matters.

46. In its additional representation the agency stated that its Quality Handbook has now been updated following the panel's recommendation. The agency added that an annual programme of training for experts has

been established, that the roles and responsibilities of the evaluation panel and programme evaluation commissions have been defined.

47. The Committee further noted that AVAP has extended its online feedback form to allow for recommendations, suggestions and acknowledgements from institutions or the general public for all its services (as part of its procedure for the presentation and processing of complaints).

48. Having considered the representation, the Committee could now follow the panel's conclusion of compliance with the standard 3.6. The Committee noted that the agency's internal QA system should be further analysed in the agency's review for renewal of registration.

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

Conclusion:

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

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

51. The Register Committee considered that AVAP only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that AVAP complies substantially with the ESG as a whole.

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52. The Register Committee therefore approved the application for inclusion on the Register. AVAP's inclusion shall be valid until 2027-06-30³.

53. The Register Committee further underlined that AVAP is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

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³ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

Application by Agència Valenciana d'Avaluació i Prospectiva (AVAP) for Inclusion on the Register

Minutes of Telephone Conversation

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Date of the conversation:	23/03/2021
Representative of AVAP:	Soledad Rodrigo, Francisco Javier Oliver Villarroya
Representative of EQAR:	Melinda Szabo

1. AVAP has submitted on 04/03/2021 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the EQAR Register Committee on the eligibility of the application and AVAP's activities within the scope of the ESG, EQAR contacted AVAP via telephone to clarify the matters below.
3. AVAP agreed to clarify the matter(s) by means of a telephone conversation.
4. EQAR asked to clarify the nature of evaluation, assessment, certification and accreditation of university institutions, which are activities offered by AVAP according to the agency's description in the Terms of Reference but it is not included in the list of activities within the scope of the ESG.
5. AVAP explained that the agency did not include this activity in its application since AVAP may only carry out such reviews once the agency has been successfully registered with EQAR. Registration in EQAR is a precondition to carry out such assessments in Spain.
6. AVAP agreed that these institutional level evaluations, accreditations, assessments and certifications are activities within the scope of the ESG and that they should be part of the activities listed in DEQAR if the agency is successfully registered.
7. AVAP added that its external quality assurance activities are defined in the Law of Universities and other legal regulations and that AVAP will have to follow these regulations to initiate the institutional level assessments and certifications.
8. EQAR further inquired on how AVAP takes decisions based on other reviews carried out by other bodies.
9. The agency explained that the agency has a process to authorize new study programmes, the follow up on study programmes, certification and renewal of study programmes, or accreditation for PhD staff that involves the recognition of experts who prepare the reports.

Standard	Actions that AVAP is currently processing	Timing
ESG 3.1 Activities, Policy and Process for Quality Assurance	AVAP is in the process to find a suitable student to complete the panels where student representation is not visible yet, namely the Accreditation Commission.	October 2022
ESG 3.2 Official Status	-	-
ESG 3.3 Independence	AVAP has already started the process to deeply modify AVAP regulations dated 2008. The new Regulations change the "Executive Committee" for a "Permanent Committee" and the members of this body are no longer the politicians, but only the social members.	Last Quarter of 2022
	AVAP is modifying our internal regulations to include a public procedure to select AVAP's Director, to ensure an even more transparent selection process, based on experience and suitability for the position.	Last Quarter of 2022
	AVAP is writing "Rules of Procedure" for the decision making bodies such as the Accreditation Commission, that would regulate the decision-making procedure and formally ensure that it is consistent and fully independent.	Last Quarter of 2022
	AVAP is going to develop and publish clear selection principles and application procedure for composing its collegial decision-making bodies, for example, the Accreditation Commission.	Last Quarter of 2022

ESG 3.4 Thematic Analysis	AVAP participates actively within REACU Thematic Analysis and will continue doing it. Moreover AVAP is deemed to work on our own regional thematic analysis, starting with the set up of a "Observatory of Employability".	2022-2023
ESG 3.5 Resources	AVAP is going to establish an internal staff development scheme that focuses on knowledge, skills and competences specific to the activities of AVAP.	October 2022
	In order to make sure that AVAP can properly perform all its functions, AVAP has already started the process of creating two new Areas with two new Head of Area.	First Quarter of 2023
	In order to be able to manage more assessment activities, new technicians are going to join AVAP staff during the next 2 years. For the moment, three new technicians will join in September.	September 2022
	With the hiring of new staff, AVAP will have new formal procedures, to have a clear understanding of all activities performed.	First Quarter of 2023
ESG 3.6 Internal Quality Assurance and Professional Conduct	AVAP is going to develop a Quality Handbook that would be linked to the principles set by the Quality Policy, to describe the roles and responsibilities of everyone involved in AVAP's activities and define AVAP's internal indicators for quality and mechanisms for their monitoring.	First Quarter of 2023
	AVAP will conduct workshops and training activities for its stakeholders on a regular basis.	Starting January 2023
	AVAP is going to systemize the feedback received during evaluation procedures through establishing an immediate follow-up procedure after every evaluation in order to assess their quality and suggest ways to improve it.	From September 2022
ESG 3.7 Cyclical External Review of Agencies	-	-

Standard	Actions that AVAP is currently processing	Timing
ESG 2.1 Consideration of Internal Quality Assurance	-	-
ESG 2.2 Designing Methodologies fit for purpose	AVAP is going to update the internal protocols for Quality Assurance activities, such as Follow up of study programmes and Study programmes certification renewal. For this purpose, an involvement from all stakeholders, in particular higher education institutions will be assured, through a transparent procedure.	Last Quarter of 2022
	AVAP is going to create a Committee of methodologies, protocols and appointments, where sufficient representation of all stakeholders will be provided.	Last Quarter of 2022
ESG 2.3 Implementing Process	AVAP will establish a site visit for authorization (verification if successfully listed in EQAR) of new study programmes and foresee specific cases when site visit would be applicable in study programme follow up-procedure.	First Quarter of 2023
ESG 2.4 Peer-review experts	AVAP is going to implement regular and mandatory training for all evaluators.	Starting January 2023
	AVAP is reconsidering the role of the student within the Committees, to remove the administrative tasks to them. We are also considering that all members review all criteria, even if there is one person responsible for each criteria. This will be taken into account when updating the Protocols.	September 2022

ESG 2.5 Criteria for outcomes	When updating our internal QA Protocols, AVAP will develop and publish written bylaws on the decision-making process for different decision-making bodies	Last Quarter of 2022
ESG 2.6 Reporting	When updating our internal QA Protocols, AVAP will modify the assessment process, and the reports produced by the external experts will be public, and will not be modified by other assessment body.	Last Quarter of 2022
ESG 2.7 Complaints and Appeals	When updating our QA Protocols, AVAP will clearly establish a procedure for appeals, and the body that will review the appeals will be different from the body that issues the external report. The procedure for complaints is already different, but will be more clearly published.	Last Quarter of 2022
	When updating our QA Protocols, AVAP will reconsider the function of the current Guarantee's Commission in the light of new procedures for complaints and appeals	Last Quarter of 2022

Application by AVAP for Inclusion on the Register

Clarification provided by the Agency

Register Committee

Date of the conversation: 10/10/2022

QA agency representatives: Soledad Rodrigo, Javier Oliver, Reyes Giner Escrinhuela

Representative of EQAR: Melinda Szabo, Blazhe Todorovski

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1. AVAP has submitted on 2021-03-04 an application for inclusion of registration on the European Quality Assurance Register for Higher Education (EQAR). On 2022-07-13, AVAP submitted the external review panel's report of 2022-06-22.
2. In order to prepare the deliberations of the Register Committee on AVAP's compliance with the ESG, EQAR contacted the agency to clarify the matters below.

ESG 2.2 – Designing methodologies fit for purpose /ESG 2.7 – Complaints and appeals

3. AVAP informed that it is in the process of finalising the QA Protocol and that the document will be effective as of 1 January 2023.
4. Among the changes expected to address, the QA Protocol will include provisions regarding the renewal of the accreditation process, the process for recording factual errors, the standard period of addressing appeals, training of experts to be offered twice a year, the role of the External Evaluation Committee, the new body named "Protocols and Appeals Commission" etc.
5. The establishment of a body that will be in charge of designing and approving regulations is in process. AVAP explained that the previously named Accreditation Commission will change its functions and in addition to reviewing and validating QA regulation the new body will also function as an Appeals Committee, considering appeals to the reports issued by the External Evaluation Committee. The agency further provided documentation on the agreement of this new body.

ESG 2.3 – Implementing processes/ ESG 2.5 – Criteria for outcomes

6. AVAP is also developing its "Rules of Procedure" for the decision making bodies to ensure consistency in decision making. The document is expected to be finalised after the QA protocol (1 January 2023).

ESG 3.1 – Activities, policy and processes for quality assurance

7. AVAP agrees that it is essential to include a student in all decision-making bodies and it has taken measures to ensure this. A call for the appointment of a student in the new Accreditation Commission (now named 'Protocols and Appeals Commission') has been recently launched by the agency. The student member is expected to be an active member of the Commission as of 15 November 2022.

<https://avap.es/en/higher-education/official-university-degrees/certification-renewal-of-study-programmes/accreditation-commission/>

Considering the international award label for universities, the agency explained that it is not carrying out these type of external evaluation processes and does not award such labels at the moment although it was an activity offered in the past. The role of AVAP is to currently assist universities that become part of European Universities alliances.

In the case of the certification of private HEIs by the French QA agency (CTI) AVAP participated but only as observer in the process.

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ESG 3.4 – Thematic analysis

8. AVAP has developed thematic analysis together with REACU and has further set up an Observatory of Employment to develop its own regional thematic analysis. The agency added that it also carries out foresight analysis of new technological, scientific studies of relevance to the Valencian Community. The agency stated that its next thematic analysis is expected to be published on June 2023 (on the topic of "Environmental Sciences"). Additionally, AVAP will continue to participate within REACU in other thematic analysis.

ESG 3.6 – Internal quality assurance and professional conduct

9. AVAP is also developing a Quality Handbook that would describe the roles and responsibilities of everyone involved in AVAP's activities. Since the handbook would be linked to the principles set in the QA Protocol, the document is expected to be finalised after the QA protocol (31 January 2023).

Valencia, 27 January 2023

EQAR
Register Committee
Ref. RC37/A111

Dear EQAR Register Committee,

Further to your Deferral of Application letter dated 25 October, and within the period of time provided to gather all the relevant information for your consideration, we would like to inform you of the following considerations:

First of all, we would like to thank the work done by the Register Committee, that has been of great help for the improvement of our quality assurance protocols and activities.

We would like to note that throughout this process we had various meetings with AQU Catalunya, who has shown its support to AVAP.

All evidence is taken from the official AVAP website: [Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#).

In respect of the specific aspects addressed by the EQAR Register Committee, please find below our comments:

ESG 2.2 – Designing methodologies fit for purpose

12. As EQAR is aware, in Spain we have a strong legal framework that supports all the quality assurance activities. Apart from this, REACU (Spanish network of quality assurance agencies) is the coalition of all the Spanish QA agencies. At REACU we discuss the Spanish legal framework and set up the basis for all the QA activities. However AVAP takes a strong position when it comes to approve the protocols to our specific region.

13 & 14. AVAP has now established the *Protocols and Appeals Commission* that is in charge of validating all the agency protocols. This Commission has already started its work by validating the updated protocols dated December 2022. All the protocols are published in our website and have been previously communicated to our stakeholders. The composition of this Commission may be found at AVAP's website and includes a student.

Evidences:

- [Protocols and Appeals Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [EVALUATION PROTOCOL: RENEWAL OF ACCREDITATION OF OFFICIAL UNIVERSITY BACHELOR'S AND MASTER'S DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- [EVALUATION PROTOCOL: RENEWAL OF THE ACCREDITATION OF OFFICIAL UNIVERSITY DOCTORATE DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- [EVALUATION PROTOCOL: FOLLOW-UP OF OFFICIAL UNIVERSITY BACHELOR'S AND MASTER'S DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- [PhDs – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [EVALUATION PROTOCOL: IMPLEMENTATION OF OFFICIAL UNIVERSITY BACHELOR'S, MASTER'S AND DOCTORAL DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)

ESG 2.4 – Peer-review experts

16. The *Authorization Committee* has a student within its members. The composition of this Committee is public at AVAP's website.

17. As regards the follow up procedure for study programmes, we would like to note that this is not a free standing procedure. The follow-up procedure is regulated (as the other QA procedures) by Royal Decree 822/2021, of 28 September, establishing the organization of university education and the procedure for quality assurance. This Royal Decree is drawn up by the Spanish Ministry of Universities and is valid for all Spanish universities. As such, this is a regulated and legal process, and AVAP has the role to adapt it to our own territory. In this sense, AVAP periodically reviews this process. The last revision was made in December 2022 and validated by the *Protocols and Appeals Commission*. All Valencian university degree programmes are required to undertake this process every three years.

18. As regards the different roles of each Commission/Committee member, please note that before recent update, each member of a Commission/Committee (including the student) was assigned with the revision of a specific criteria and standard. Apart from this, the student had the administrative role. After recent changes published in our protocols, all members of a Commission/Committee will review that the university meets all the

criteria and standards as defined by the ESG. Each committee member reviews all criteria. And the student will no longer have the administrative role.

19 & 20. In respect of the training of experts, we have scheduled a periodical set of training sessions for experts, where the AVAP staff will also be present to benefit from these sessions. Next training session is set up for Friday 3 February.

Evidences:

- [Evaluation procedure – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Follow-Up Study Programmes – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [AVAP organises online training for external evaluators – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)

ESG 2.5 – Criteria for outcomes

22. AVAP has now established written bylaws for the following Committees, and these are public at AVAP's website:

- Authorization Committee
- Follow-Up Committee
- External Evaluation Committee
- Programme Evaluation Commission
- Protocols and Appeals Commission

23. We have rephrased and updated all the Protocols so that the panel experts report is public, has its own autonomy and cannot be modified by other bodies.

For example, in the accreditation renewal process, the major changes in the sequence are as follows:

- The visit report is issued by the *External Evaluation Committee* and is sent to the university.
- The university has 5 days to report factual errors.
- The *External Evaluation Committee* resolves the factual errors and the Evaluation report is published.
- The *Programme Evaluation Commission* issues a proposal of report that is sent to the university, based on the Evaluation report and the rest of the evidences.
- The university may appeal against this report.
- The *Programme Evaluation Commission* solves the appeals, and the report is sent to the University and to the Council of Universities.

- The *Council of Universities* issues the final resolution, as per *Royal Decree 822/2021*, of 28 September, establishing the organization of university education and the procedure for quality assurance.
- The university may appeal against the final decision issued by the Council of Universities. AVAP's body in charge of this appeals is the "*Protocols and Appeals Commission*".

Evidences:

- [ROF-Comite-de-Autorizacion-en-GB.pdf \(avap.es\)](#)
- [ROF-Comite-de-Seguimiento-en-GB.pdf \(avap.es\)](#)
- [ROF-Comite-de-Evaluacion-Externa-en-GB.pdf \(avap.es\)](#)
- [ROF-Comision-de-Evaluacion-de-Titulos-en-GB.pdf \(avap.es\)](#)
- [ROF-Comision-de-Protocolos-y-Recursos-en-GB.pdf \(avap.es\)](#)
- [Programme Evaluation Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Protocols and Appeals Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [EVALUATION PROTOCOL: RENEWAL OF ACCREDITATION OF OFFICIAL UNIVERSITY BACHELOR'S AND MASTER'S DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)

ESG 2.7 – Complaints and Appeals

25. In respect of the complaint's procedure, we have improved the process with the following:

- The mailbox is now more visible in our website. At the section "Transparency" we updated the process for "Complaints, suggestions and congratulations". There is a specific process AVAP has established, regulated at "Resolution of 2 December 2020, of the President of the Valencian Assessment and Forecasting Agency".
- Apart from the above, all our QA Protocols include a section named "Complaints and Appeals" in which it is clearly defined the process for complaints (dissatisfaction with the conduct of the process or those conducting it) and the process for appeals (to challenge the formal outcome).

26 & 27. Regarding the process for appeals, it is possible to make an appeal in all the QA procedures. The final decision may be contested through the *Protocols and Appeals Commission*, which is a permanent Commission which is fully operative.

28. *Programme Evaluation Commission* and *Protocols and Appeals Commission* are officially appointed and have been active and functioning since December. For example, *Programme Evaluation Commission* is working on the accreditation renewal process that have arrived at AVAP since November and *Protocols and Appeals Commission* has validated the updates of the protocols.

Evidences:

- [Suggestions, Complaints and Congratulatory – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- Page 30 of [EVALUATION PROTOCOL: RENEWAL OF ACCREDITATION OF OFFICIAL UNIVERSITY BACHELOR'S AND MASTER'S DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- Page 26 of [EVALUATION PROTOCOL: FOLLOW-UP OF OFFICIAL UNIVERSITY BACHELOR'S AND MASTER'S DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- Page 9 of [EVALUATION PROTOCOL: IMPLEMENTATION OF OFFICIAL UNIVERSITY BACHELOR'S, MASTER'S AND DOCTORAL DEGREES IN THE COMUNITAT VALENCIANA \(avap.es\)](#)
- [Programme Evaluation Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Protocols and Appeals Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)

ESG 3.1 – Activities, policy and processes for quality assurance

30. As mentioned in your letter, AVAP's commitment is that a student member is represented in all assessment bodies. Now our website is updated to correctly reflect that a student is a member of all the Committees and Commissions.

Apart from this, AVAP set up a "*Student Commission*" that was established in 2017 and we periodically meet with them to discuss any questions that are important for them, in respect of study programmes, institutions, centres, academics, or anything related to the university system. Student representatives of all Valencian universities are included in this Commission.

31. As mentioned in your letter, AVAP has a student member represented in all our assessment bodies and the full composition of each body is properly reflected on the AVAP website.

32. Until now, the role of AVAP in the process of international labels awarded to Valencian universities (European Universities alliances) is as an observer because we do not yet have this competence.

Evidences:

- [Advisory Bodies – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Evaluation procedure – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Bachelors and masters – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Bachelors and masters renewal – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Programme Evaluation Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Protocols and Appeals Commission – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)

ESG 3.3 – Independence

36, 37 & 38. Please note that the Regional Government does not have a large influence in the governance and operation of AVAP. All the technical decisions regarding study programmes are taken by the technical bodies that make the assessments.

Since the Executive Committee had a large number of representatives of the Regional Government, and in order to minimize our dependence on them, we have invested a large amount of time to modify the Rules of Procedure of AVAP. Please note that in Spain, to modify this Regulations require of a legal process involving many stakeholders. We are happy to announce that this process is already underway.

The new structure of AVAP managing organization is:

- a) the *Steering Committee* is the collegiate body of AVAP and has general (not technical) tasks such as approving the annual budget and annual accounts, the staff organization, the annual plan of activities, etc.
- b) the *Permanent Commission*. This is one of the main changes in the rules of procedures of AVAP to win independence. The Executive Committee has been replaced for this new commission that is no longer composed by representatives of the Regional Government.

Evidences:

- [Legal-Framwork-AVAP-en-GB.pdf](#)

ESG 3.4 – Thematic analysis

40, 41 & 42. We continue the collaboration with some of the other Spanish agencies and we are organising studies focused on our region. AVAP has explicitly participated in these 2: the Journalism and Audiovisual Communication studies and the Teacher Training Master's studies.

With regard to the studies focused on our region, we have opted to open a line of work on the labour market insertion of our graduates. In 2016, AVAP coordinated the "green book on the employability of university graduates in the Valencian Community", which had a great impact, but was not followed up at the time. In the future, we intend to coordinate the Observatory of Labour Market Insertion in higher education in the Valencian Community by addressing a common and coordinated procedure from AVAP. To this end, in 2020, a document was drawn up showing the situation in each of our universities. As a next step, we have a study underway, which will serve as a pilot experience on labour market insertion in the area of environmental sciences, a subject chosen based on an explicit request from our universities (due to its not very large size).

In the area of research management, each new call for proposals concludes with a study of the results from which actions for improvement are obtained. We are currently completing the processing of the 2022 call.

AVAP participates actively within REACU Thematic Analysis and will continue doing it. Moreover AVAP is deemed to work on our own regional thematic analysis, starting with the set up of a "Observatory of Employability".

Evidences:

- [AVAP COORDINATES, TOGETHER WITH AQU CATALUÑA AND ACPUA, A PIONEERING STUDY ON LABOUR MARKET INSERTION IN SPAIN – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Thematic Analysis – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [Forecasting – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)

ESG 3.6 – Internal quality assurance and professional conduct

44. AVAP has developed a Quality Manual describing the roles and responsibilities of:

- The Commissions and Committees (external structure) and
- Our own staff (internal structure).

45. In respect of the systematic approach to training of evaluators, we have scheduled the training sessions for 2023, resulting in one training session next 3 February and the following session on 15 June 2023. The training sessions will be conducted by expert evaluators and AVAP personnel and will be addressed for all evaluators and AVAP staff.

Regarding lack of feedback to the external evaluators on the final content of the report is now solved since the report issued by them is different from the report issued by the Programme Evaluation Committee and both are published, so the evaluator may check the final report. In any event, before it is published it will be the President of the Committee the one that will share the result with the other team members.

The issues reported in EQAR letter regarding the issues with the electronic platform are unknown for us, since it is the first time we hear about this issues, and we can only think that perhaps this was a one-off situation for one evaluator.

Evidences:

- [Staff – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)
- [QA-Manual.pdf \(avap.es\)](#)
- [QA-Handbook.pdf \(avap.es\)](#)
- [AVAP organises online training for external evaluators – Agència Valenciana d'Avaluació i Prospectiva \(AVAP\)](#)