

Deferral of the Application by Enhancing Quality in the Arts (EQ-Arts) for Renewal of Inclusion on the Register

Register Committee

13-02-2024

Ref. RC41b/A141

Ver. 1.0

Date 2024-02-13

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Application of:	2022-11-11		
Agency registered since:	2021-01-01		
Type of review:	Full	Site visit:	2023-06-28
External review report of:	2023-11-03	Submitted:	2023-11-03
Review coordinated by:	ASIIN e.V. (ASIIN)		
Review panel members:	Amanda Bright, Anne Herman Flierman, Leander Gussmann, Siegfried Hermes, Tatjana Volkova		
Decision of:	13-02-2024		
Registration until:	n/a		
Absented themselves from decision-making:	n/a		
Attachments:	<ol style="list-style-type: none"> 1. Tripartite Terms of Reference 2. External Review Report, 2023-11-03 3. Clarification by the Review Panel, 10/12/2023 		

1. The application of 2022-11-11 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-12-16.
3. The Register Committee considered the external review report of 2023-11-03 on the compliance of EQ-Arts with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel on 2023-12-10.
5. The Register Committee invited EQ-Arts to make additional representation on the grounds for possible rejection on 2024-02-16.

Analysis:

6. In considering EQ-Arts's compliance with the ESG, the Register Committee took into account the following activities:

- Institutional accreditation and revalidation
- Institutional review

- Programme accreditation and revalidation
- Programme enhancement review
- Unit enhancement review
- Joint programme enhancement review

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7. The activities *research and European projects* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

8. The Register Committee found that the report provides sufficient evidence and analysis on EQ-Arts's level of compliance with the ESG.

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

ESG 2.3 – Implementing processes

10. The Register Committee concurred with the panel's judgement and found the agency to be compliant with the standard. The Committee, however, underlined the panel's recommendation that EQ-Arts should review and update the information about its external quality assurance procedures on its website, remove outdated documents and provide accurate information on its procedures.

ESG 2.6 – Reporting

11. From the report, the Committee learned that in one of the two procedures undertaken since EQ-Arts' registration on EQAR in 2021, the agency combined an institutional and programme review of an institution. While the report showcased separate judgements on standards per programme and the institution itself, the panel noted that the analytical parts were not clearly divided.

12. The Register Committee was able to concur with the panel's judgement and found the agency to be compliant with the standard. The Committee, however, highlighted the panel's suggestion for further improvement that EQ-Arts should clearly and distinguishably report and present analysis and outcomes of the different objects of the accreditation procedure in its reports.

ESG 2.7 – Complaints and appeals

13. EQ-Arts has defined a complaints and appeals' procedures. The Register Committee, however, learned that an appeal can be only submitted against conditional or negative decisions resulting from an accreditation procedure. Institutions undergoing an enhancement-oriented procedure cannot appeal against the final recommendations.

14. According to the Policy on the Use and Interpretation of the ESG, every formal judgement should possibly be a subject of an appeal, irrespective of

the nature of the external quality assurance procedure. While the Committee concurred with the panel's judgement and found the agency to be compliant with the standard, it recommended that the agency expands the scope of its appeals' procedure and includes enhancement procedures too.

ESG 3.1 – Activities, policy and processes for quality assurance

15. In its last decision of 2021, the Committee underlined that EQ-Arts should be mindful with engaging in (paid and unpaid) activities with institutions that may further lead to compromising the future review processes and advised the agency to make adequate provisions in its documents to rule out carrying out a review of that institution. From the report, the Committee learned that EQ-Arts has amended its Governance Framework and now formally commits not to enter in any consultancy activities with institutions undertaking reviews.

16. Despite the formal policy, the panel noted confusion in the use of terminology, especially concerning the differences between, on one hand, the accreditation and enhancement reviews (under the scope of ESG), and, on another, on the benchmarking (tailor made consultancy like) activities offered by the agency.

17. The Committee inquired to learn further about the benchmarking activities and how the agency makes a distinction in practice. In the response to the clarification request, the panel explained that it was not clear how this happens in practice and whether the agency had undertaken any such tailor made procedures lately.

18. Since the registration of EQ-Arts on EQAR in 2021, only one formal assessment and one enhancement-oriented review were conducted. The assessment review was undertaken with another EQAR registered agency. In the agency's understanding, the low number of reviews was caused by the Covid-19 crisis. The Committee shared the panel's view that the agency could have explored alternative ways of "mitigating the negative impact of the pandemic" (ERR, p16) and further expand its activities in the recent months.

19. Considering the lack of clear distinction between external quality assurance and its other fields of work, and the absence of regular practice of performing external quality assurance activities, the Committee concurred the panel's judgement and found the agency to be partially compliant with the standard.

ESG 3.3 – Independence

20. In the decision of 2021, the agency was found to be compliant with the standard. The current external review report, however, shed a new light on aspects of the agency's governing and procedural arrangements, that were not covered by the previous external review reports (of 2018 and 2021) – the role of the Governing Board in the work and formal outcomes of the agency.

21. The panel noted that the involvement of the Governing Board in the review process is significant. For example, a Board member serves as a Chair in all panels. Upon the completion of the report by the panel, two Board members are involved in finalising the text. The final decision on the report is taken by the Board. While the agency has formal mechanisms for preventing influence over the decision-making from the Board members involved in the review process, the panel expressed concerns of informal influences (ERR, p22).

22. The involvement of the Governing Board is also prominent in other areas of the work of the agency. For example, in the complaints' procedures, it is always the Chair of the Governing Board that takes the final decision.

23. The Committee shared the panel's concerns that the increased role of the Governing Board throughout the full review process creates considerable risk for the independence of the agency's outcomes. In the light of this new evidence, the Register Committee concurred with panel's judgement, and found the agency to be partially compliant with the standard.

ESG 3.5 – Resources

24. In its previous decision of 2021, the Register Committee found the agency to be partially compliant with the standard due to the volatile financial and human resources. From the external review report, the Committee learned that the status quo has not improved.

25. Furthermore, the panel noted that the agency is currently dependent on loans from its former and current Board members – circumstances that according to agency's accountant "*raise reasonable doubt about the continuation of the activities of EQ-Arts*" (ERR, p29). At the time of taking the decision for inclusion on EQAR, the Committee understood that the loans of the Board members serve only as a start up funding but not as capital that would need to be used continuously for the agency to be able to function.

26. In the Committee's understanding, the sustainability of the agency has been questioned since its first review in 2018. At the time though, the Committee believed that the agency would expand its activities (see also ESG 3.1) and strengthen its resources in the upcoming years. **Following the recent decline in agency's resources and the worrisome dependency of EQ-Arts on the willingness of Board members to financially support the agency, the Committee found that the sustainability of EQ-Arts's work severely endangered. Following this, the Committee was unable to concur with the panel's conclusion and found the agency to be non compliant with the standard.**

ESG 3.6 – Internal quality assurance and professional conduct

27. In the external review report of 2018, the panel noted that EQ-Arts has several mechanisms for feedback gathering. The reflections, though, were not always feeding into the improvement of the internal work of the agency. The Committee at that point, found that EQ-Arts is a relatively new agency

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that is yet to demonstrate the practical work of its internal quality assurance cycle. The Committee was of belief that EQ-Arts would make the best use of its tools and established a closed improvement cycle.

28. In the external review report of 2023, the panel noted that even though the agency maintained some of its mechanisms (such as surveys for customers and reviewers), little evidence was found regarding the utilisation of the feedback. In the panel’s view, the internal quality assurance process is mainly taking place in informal manner, while the internal quality assurance cycle is yet to be closed.

29. Following the above mentioned, **the Register Committee concurred with the panel’s judgement and found the agency partially compliant with the standard.**

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

Conclusion:

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

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

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Since EQ-Arts does not comply with one standard, the Register Committee was unable to conclude that EQ-Arts complies substantially with the ESG as a whole.

32. The Register Committee therefore intends to reject the application. In accordance with §3.27 of the Procedures for Applications, the Committee therefore deferred the consideration of EQ-Arts's application for renewal, pending additional representation by EQ-Arts on the grounds for possible rejection, set out in the present decision.

33. In case of rejection, EQ-Arts would have the right, according to §3.31 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.

34. EQ-Arts is requested to make additional representation by the 13/03/2024 at the latest. EQ-Arts may also withdraw the application before that date according to §3.27 of the Procedures for Applications. If no additional representation is made by that date, EQ-Arts will be deemed to have withdrawn the application.

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External review of EQ-Arts against the ESG

TERMS OF REFERENCE

The present Terms of Reference are to be agreed between EQ-Arts (applicant), ASIIN (coordinator) and EQAR.

1. Background

EQ-Arts is a sector-specific, not-for-profit, foundation that represents a wide range of disciplines within the broad remit of the creative and performing arts and design (CPAD). Its focus is on enhancement-led quality assurance (QA) for higher arts education across the European Higher Education Area (EHEA) and beyond.

Through its activities EQ-Arts supports higher arts education institutions in the self-evaluation and enhancement of their internal quality systems to promote a strong quality culture across the higher arts education sector.

The activities undertaken by EQ-Arts are based on the governing principle that all institutions will be treated fairly and equally in having open access to the professional knowledge and experience of EQ-Arts. Therefore, the mission of EQ-Arts is to assure and enhance quality across the CPAD sector as a whole in ways that are even-handed and impartial.

Operated and driven by a group of trained and highly experienced international peer quality experts in higher arts education, EQ-Arts co-operates with national QA agencies, is an ENQA affiliate and is registered on the European Quality Assurance Register (EQAR).

EQ-Arts is applying to renew its EQAR registration for the second time.

Applicant's Independence from the coordinator

Applicant organisation and coordinator confirm that the coordinator has not provided remunerated or unremunerated services to the agency during the past 5 years, or vice-versa. Furthermore, the coordinator guarantees to take appropriate measures in preventing conflicts of interests within his own staff as well as expert reviewers. Both the applicant and coordinator officially commit themselves not to be reviewed (in the next 5 years) by the agency for which it coordinates the review.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which EQ-Arts fulfils the requirements of *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to EQAR to support EQ-Arts' application.

2.1 Activities of EQ-Arts within the scope of the ESG

This review will analyse all activities of EQ-Arts that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning. This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary in nature.

The following enhancement and accreditation activities of EQ-Arts (ref: *EQ-Arts Governance Framework* June 2022 p.11) are to be addressed in the external review:

<i>Institutional</i>	This will focus on the effectiveness of the institution's own quality assurance and enhancement systems to achieve the stated aims and objectives.
<i>Unit</i>	This will focus on the degree to which a Faculty, Department or School is delivering a range of academic provision that meets the academic objectives set out for it.
<i>Programme</i>	This will focus on the degree to which the following programme levels have been able to sustain and enhance their academic provision: <ul style="list-style-type: none">• Pre-degree Certificate/Diploma;• BA, MA;• PhD, Doctorate.
<i>Joint</i>	This may focus on a collaboration between two or more institutions seeking to offer, for example, a joint programme leading to a single academic award or, a compact arrangement between a pre-degree certificate/diploma and an undergraduate BA programme.

The review will also address the way in which EQ-Arts prevents conflicts of interests related to its training and partnership activities taking into account Annex 2 of the Policy on the Use and Interpretation of the ESG.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the draft Terms of Reference for the review between EQ-Arts and ASIIN;
- Agreement on the Terms of Reference by EQAR;
- Nomination and appointment of the review panel by ASIIN;
- Self-assessment by EQ-Arts including the preparation and publication of a self-assessment report;
- A site visit by the review panel to EQ-Arts;
- Preparation and completion of the final review report by the review panel;
- Analysis of the final review report and decision-making by the EQAR Register Committee.

3.1 Nomination and appointment of the review team members

The review panel consists of 4 members:

- Academia:
 - one representative of Higher Education Institutions with a professional background in the creative and performing arts and design (CPAD) sector.
- QA Agency:

- one representative of an accreditation agency not related to EQ Arts.
- Student:
 - One student, ideally from the creative and performing arts and design (CPAD) sector.
- One individual from a country other than that of the applicant, with a high level of experience/knowledge of the higher education and/or the professional sectors.
- ASIIN Consult GmbH as coordinator of the review process ensures the selection of the Review Panel. The coordinator takes responsibility for selecting qualified experts in a fair and transparent procedure. ASIIN, as a membership organization recruits among its members committee, members, and honorary expert panel members for the association's activities. ASIIN organizes on a regular basis training for the experts. Thus, ASIIN ensure that all experts are experienced in working with the ESG and criteria sets based on the ESG, performing site-visits and leading stakeholder discussions.

Consequently, ASIIN will ensure that all panel members have either completed a formal training for agency reviews against the ESG 2015 or have participated in at least two reviews with a quality assurance agency against the ESG that were accepted to support an application to EQAR.

ASIIN ensures that experts are selected from a wide variety of different backgrounds and at least one expert from a different country. The coordinator does not select experts who have been previously involved in providing services to the applicant quality assurance agency or otherwise have a real or apparent conflict of interest as defined in §4 of EQAR's Code of Conduct.

ASIIN will provide EQ-Arts with the list of suggested experts and their respective curricula vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the EQ-Arts review, covering at least the cases of interest defined in the EQAR Code of Conduct.

Once appointed, ASIIN will inform EQAR about the appointed panel members.

Among the panel members a Chair and a Secretary is chosen. At least one member of the Review Panel has an international background not related to the country/countries of residence of the agency under review, but with a high level of experience/knowledge of the higher education and/or the professional sectors. The selected panel members are completely independent from the agency under review.

The panel will be supported by an ASIIN project manager who will monitor the integrity of the process and ensure that EQAR's requirements are met. The project manager will take care of the organisation of the procedure and the site visit, take notes of the discussions with EQ-Arts and draft a proposed review report for the discussion among the review panel members.

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

EQ-Arts is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;
- The self-evaluation report shall reflect on the applicant's compliance with each of the ESG in parts 2 and 3. The report is a critical reflection on the activities, strengths and weaknesses of the applicant and the added value they provide for quality improvement of higher education institutions.
- The self-assessment report is broken down by the topics of the review and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal.
- All of the above listed external QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which EQ-Arts fulfils its tasks of external quality assurance and meets the ESG and thus the requirements for EQAR registration.
- ASIIN offers to EQ-Arts the option of have the SAR formally scrutinised before submitting the final version of the report. This scrutiny does not involve an assessment of the content itself but merely the formal adequacy and completeness of the report and its annexes.
- The report is submitted to the review panel at the latest 6 weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2 to 3 days. The approved schedule shall be given to EQ-Arts at least one month before the site visit, in order to properly organise the requested interviews.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

3.4 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In

particular, it will provide a clear rationale for its findings concerning each ESG standard. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR¹.

The external report will reflect reality at the time of review.

A draft will first be submitted to EQ-Arts usually within 6 weeks of the site visit for comment on factual accuracy. If EQ-Arts chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within 2 weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by EQ-Arts, finalise and submit the document to ASIIN and EQAR. All panel members will sign-off on the final external review report of EQ-Arts. ASIIN will sign and provide to EQ-Arts the Declaration of Honour together with the final report.

The report is to be finalised within 10 weeks of the site visit and will normally not exceed 50 pages in length.

4. Publication of the report

EQ-Arts will receive the expert panel’s report and publish it on its website. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

5. Decision-making on EQAR registration

The agency will submit the review report via email to EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and the full curriculum vitae (CVs) of all review panel members. In addition, EQ-Arts may provide any other relevant documents to the application (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency’s application at its Register Committee meeting in the first quarter of 2024.

6. Indicative schedule of the review

Agreement on Terms of Reference	September/2022
Appointment of review panel members	January 2023
Self-assessment completed	April/2023
Preparation of site visit schedule and indicative timetable	April/2023
Briefing of review panel members	May/2023
Review panel site visit	26-28 June/2023
Draft review report	End of August/2023

¹ See here: <https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2.0-2015.pdf>

Statement of EQ-Arts to review panel (if applicable)	15th of September /2023
Submission of final report to EQ-Arts	28 th September 2023
Submission of final report to EQAR	30 th of September 2023
EQAR Register Committee meeting and decision on the application by EQ-Arts	First Quarter 2024



AGENCY REVIEW REPORT EQ-ARTS



COORDINATED BY ASIIN
DATED: 3 NOVEMBER 2023

EXECUTIVE SUMMARY

After completing the review procedure and considering EQ-Arts' response to the review report, along with additional information and documents provided, the review panel has concluded the following judgements regarding EQ-Arts' compliance with the standards of ESG Part 2 and 3:

ESG Part 3	Judgement
3.1 Activities, policy, and processes for quality assurance	<i>Partially compliant</i>
3.2 Official status	Compliant
3.3 Independence	<i>Partially compliant</i>
3.4 Thematic analysis	Compliant
3.5 Resources	<i>Partially compliant</i>
3.6 Internal quality assurance and professional conduct	<i>Partially compliant</i>
3.7 Cyclical external review of agencies	Compliant
ESG Part 2	
2.1 Consideration of internal quality assurance	Compliant
2.2 Designing methodologies fit for purpose	Compliant
2.3 Implementing processes	Compliant
2.4 Peer-review experts	Compliant
2.5 Criteria for outcomes	Compliant
2.6 Reporting	Compliant
2.7 Complaints and appeals	Compliant

5 The panel found that requirements are not yet appropriately met by EQ-Arts with regard to ESG 3.1 (EQA-Activities), 3.3 (Independence), 3.5 (Resources) and 3.6 (IQA), whereas ESG 3.2, 3.4, 3.7 as well as 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7 are considered to be adequately addressed.

In case of the review panels' compliance judgements concerning ESG 2.3, 2.4 and 2.6, reference is being made to its assessment of related issues addressed under ESG 3.1 (2.3) and ESG 3.3 (2.4, 2.6),
 10 respectively.

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INTRODUCTION

This agency EQ-Arts review report analyses the compliance of EQ-Arts – Enhancing Quality in the Arts (hereafter EQ-Arts) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (hereafter ESG). It is based on an external review conducted between April and December 2023, with a site visit from 26 to 28 June 2023.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

The EQAR Procedure for Applications requires new applicants to undergo an external cyclical review, at least once every five years to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is EQ-Arts second full review, the panel will provide clear evidence of results in all areas and to analyse progress made since the previous review. The panel has adopted a developmental approach with a view to the enhancement of the agency.

MAIN FINDINGS OF THE 2018 FULL REVIEW AND 2021 FOCUSED REVIEW

EQ-Arts underwent its first full EQAR review in 2018 coordinated by the European Consortium for Accreditation (hereafter ECA). In its rejection decision dated June 2019¹, the EQAR Register Committee concluded “compliance” judgements on ESG 2.1, 2.2, 2.3, 2.6, 2.7, and “partial compliance” judgements on ESG 2.4, 2.5, 3.1, 3.3, 3.4 and 3.5.

Deficiencies identified by the Register Committee in line with its “partial compliance” judgements were subsequently addressed as ECA concluded in its focused review of 2021.² The results of the Register Committee’s approval decision in March 2021 consequently has been a “compliance” judgement on all remaining standards, except for ESG 3.5, which the Committee still considered only “partially compliant”. With respect to the resource base of EQ-Arts the Committee was unable to see major progress since the full review and, on the contrary, observed sustained volatility of financial and personal resources. In its holistic judgement, the Register Committee nevertheless considered “that the volatile resource situation is understandable for a young agency that operates nearly entirely based on voluntary reviews”, and concluded that EQ-Arts substantially complied with the ESG as a whole.

REVIEW PROCESS

The primary purpose of the 2023 external review of EQ-Arts is to verify that the reviewed organization acts in compliance with the European Standard and Guidelines. While executing this task, the review panel also took into account EQAR’s use and interpretation of the ESG. The review itself has been

¹ Available on EQAR’s website: https://backend.deqar.eu/reports/EQAR/2019_06_A63_RejectionDecision_EQ-Arts.pdf (Access: 15.07.2023).

² Available on EQAR’s website: https://backend.deqar.eu/reports/EQAR/A103_EQ-Arts_ApprovalDecision_v1_0.pdf (Access: 15.07.2023).

conducted in line with the process described in EQAR Procedure for Applications and according to the timeline set out in the Terms of Reference. The panel for the external review of EQ-Arts was appointed by the ASIIN Certification Committee and confirmed by EQAR. It is composed of the following members:

- 5 • Amanda Bright, former Dean of the School of Arts and Media of the University of Brighton, UK;
- Dr Anne Herman Flierman, former long-time chair of the board of NVAO, Netherlands;
- Leander Gussmann, PhD student at the Academy of Fine Arts Vienna, Austria;
- 10 • Dr Siegfried Hermes (Secretary), Senior Project Manager and Consultant with ASIIN e.V./ASIIN Consult, Germany;
- Prof Tatjana Volkova, Professor of Strategic Management and Innovation Management at BA School of Business and Finance in Riga, Latvia.

Self-Evaluation Report

15 EQ-Arts developed its Self-Evaluation Report (hereafter SER) from December 2022 to April 2023. The final version of the SER was submitted to the ASIIN (coordinator of the EQAR review) in April 2023.

 The report comprises a general overview of the vision, mission, values, context and brief history of the agency (Part One) and an in-depth analysis of its external quality assurance (hereafter EQA) activities under the ESG in relation to parts 2 and 3 of the ESG (Part Two). In each section of this second part of the SER, EQ-Arts describes and evaluates its core EQA activities (improvement and assessment procedures), related processes and actions, always linked to relevant supporting documents (such as statutes and regulations, templates, organisation charts, indicative timetables, minutes, etc.).

20 During and particularly after the visit, EQ-Arts presented additional information/documentation. In particular, a document entitled “EQ-Arts Clarification of matters_after site visit” was provided after the visit, which contained relevant information on EQ-Arts’ Internal Quality Assurance (hereafter IQA), further clarification on EQ-Arts’ EQA activities, reporting and decision-making process, and on certain aspects of EQ-Arts’ standards and criteria.

25 Moreover, EQ-Arts introduced changes to its documents (revised Government Framework and others) and the website during or after the visit in response to observations from the panel. The review panel welcomed and considered the additional documentation as indicated in this report. However, given this was submitted after the review meetings, it should be noted that the panel was not able to evidence this documentation being applied in actual procedures.

Site visit

35 The review team held a virtual preliminary online meeting on 20 June 2023 to prepare for the site visit. The experts discussed the key findings and issues to be clarified by EQ-Arts; the secretary prepared a list of questions.

 The site visit took place from 26 to 28 June 2023 in Brussels. During the three-day visit, the review team held a preliminary meeting on the first day. This was followed by meetings with members of the Executive Office, the Board of Directors of EQ-Arts and a number of internal and external stakeholders ensued, during which the review team inquired about EQ-Arts’ EQA activities about ESG compliance. The time schedule to this review can be found in Annex 1 of this report.

Review Report and Commenting by EQ-Arts

The draft review report has been submitted to EQ-Arts on 14 September 2023. EQ-Arts provided its commentary and some additional information/documentation requested by the review panel (concerning the EQ-Arts standards, sample EQ-Arts' Cooperation Agreements and exemplary survey results from different stakeholder groups) by 7 October 2023.

Some factual errors of the review panel have been corrected directly in the related descriptive and analytical parts of the report. EQ-Arts also submitted substantial comments, which is understandable given the impact of this review for the agency. The panel decided to react to these comments by addressing them in a systematic manner (grey boxes with the "final assessment of the review panel after comments of EQ-Arts").

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

EQ-Arts is an international, cross-border quality assurance and enhancement agency. Its quality assurance activities occur across the European Higher Education Area (hereafter EHEA). EQ-Arts therefore operates in a context of diverse national Higher Education (hereafter HE) regulations and divergent higher education cultures.

QUALITY ASSURANCE

As a cross-national agency, engaged in activities across the countries of the EHEA with their diverging HE systems and Quality Assurance (hereafter QA) cultures, EQ-Arts is often required to cooperate with national accreditation agencies. This particularly applies to accreditation procedures, where national legal requirements have to be considered and/or where the participation of a national agency is required. Cooperations are conducted based on an agreement (Cooperation Agreement, hereafter CA), which – amongst others – stipulate, the responsibilities of each partner in the procedure, the underlying standards, award of certificates, reporting, etc.

EQ-ARTS

EQ-Arts was initially developed as part of the European League of Institutes of the Arts (hereafter ELIA) with the support of an EC/EU funded Thematic Network Project. The main goal was to enhance the quality and capability of education and research in the field of arts within the EHEA using Bologna tools and actions.

To achieve this, ELIA engaged in various projects, including the inter}artes project (2005-2007), which aimed to formulate arts-specific intended learning outcomes (ILOs) for Fine Art, Design, Performing Arts, and Film. Additionally, the artesnetEurope project (2007-2010) was launched to develop subject-specific IQA processes within ELIA's membership. These initiatives involved more than 130 arts institutions from across Europe.

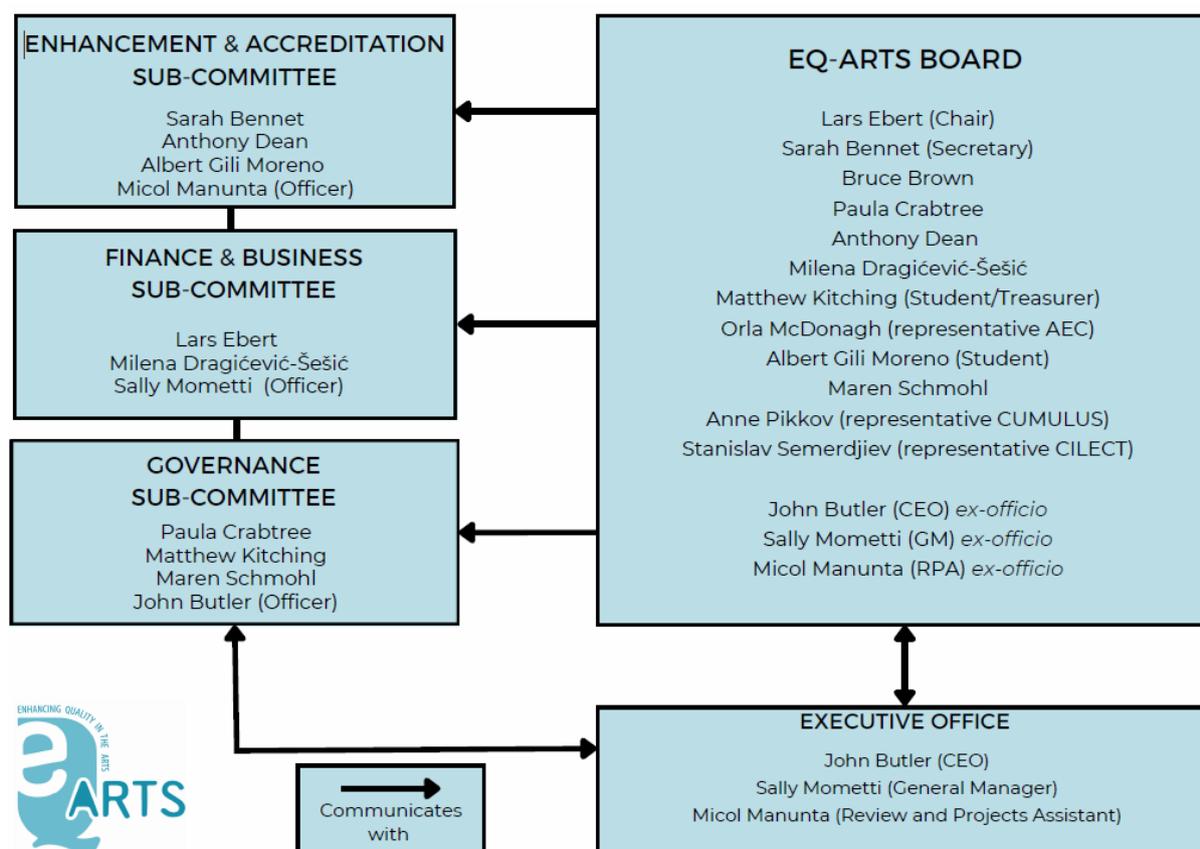
During these projects, external institutional quality enhancement reviews were conducted in several countries, followed by evaluation visits two years later. The reviews' framework and

protocols were regularly assessed through regional workshops, gathering insights and feedback from stakeholders and the higher education community.

ELIA formed an international group of experienced professionals from within its membership to ensure expertise in quality assurance, which later became the independent foundation EQ-Arts under Dutch law (established on July 20, 2015). The foundation aimed to join the European Quality Assurance Register for Higher Education (hereafter EQAR) while continuing its mission to enhance the quality of arts education and research within the EHEA.

Subsequently the organisational structure of EQ Arts is depicted.

EQ-ARTS' ORGANISATION/STRUCTURE



EQ-ARTS' FUNCTIONS, ACTIVITIES, PROCEDURES

The vision and mission of EQ-Arts is to be a trusted provider of quality assurance and quality enhancement measures for the Creative Performing Arts & Design (hereafter CPAD) sector. The agency has developed a uniform procedural scheme for these different types of QA procedures (enhancement/accreditation) conducted at different (institutional/unit or programme/joint-collaborative) levels.

In addition, EQ-Arts emphasises its vision to be a trusted contributor to the CPAD sector, working constructively and efficiently with higher education institutions (hereafter HEI) and national agencies, by hosting international QA workshops, contributing to QA-focused international conferences and conducting training workshops for peer reviewers. As to the latter, the trainings are primarily targeted

to recruit well-qualified peer experts for its own reviews, who then are eligible to be included in its expert register. Ideally, however, EQ-Arts has also trained experts for other agencies as well, thereby providing a service to the entire Higher Arts Education (HAE) sector.

5 A major activity field of EQ-Arts its participation in EU / EC projects in the context of QA in the HAE sector, within which the development of IQA systems in HAE institutions and the provision of subject-related qualification frameworks for the CPAD sector are major issues.

EQ-ARTS' FUNDING

10 The resource base of EQ-Arts is comparatively small in terms of both financial and human capacity. Since its establishment as an independent agency, its resources have been volatile. The main sources of income are the enhancement and accreditation procedures, the EU / EC projects, and to a certain small extent the training of experts on a fee basis.

As an independent, cross-border agency, EQ-Arts does not receive any government or other external funding.

15

FINDINGS: COMPLIANCE OF EQ-ARTS WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2021 focused review recommendations

None

Evidence

In its published Mission statement,³ EQ-Arts commits itself to the core principles of the ESG and explicitly declares that “Quality Assurance processes should

- be the primary responsibility of Higher Education Institutions (HEIs) in assuring the quality of their own provision;
- be responsive to the diversity of higher education systems, institutions, programmes and students;
- support the development of a quality culture;
- take into account the needs and expectations of students, other stakeholders and society.”

When it comes to Higher Arts education within the fields of CPAD across the EHEA, the agency’s mission is “to

- promote a strong quality culture for excellence and its continuous enhancement;
- help guarantee the equivalence of minimum threshold standards for any academic qualification offered in the EHEA;

³ The core principles, Mission and Vision EQ-Arts are available on the internet (<http://www.eq-arts.org/about-eq-arts/>), but also laid down in paragraphs 3 and 4 of EQ-Arts Governance Framework. Unfortunately, there are still different versions of this fundamental document circulating, with the most recent revision as of April 2023 accessible in the “Downloads” section of the EQ-Arts website: <http://www.eq-arts.org/wp-content/uploads/2023/06/reduced-EQ-Arts-Governance-Framework-2023.pdf>), while the “Core processes” section still links to the 2020 version: <http://www.eq-arts.org/wp-content/uploads/2016/09/Annex-22-EQ-Arts-Quality-Framework-for-Accreditation-and-Assessment-5.7.20.pdf> (Access: 15.07.2023, all sources). For ease of understanding, the review panel will only refer to the latest 2023 version (Annex 1 to the SER).

- continually enhance the student learning experience to achieve the highest standards;
- encourage the transfer of knowledge gained through staff research back into teaching;
- instil trust and confidence in the processes of quality assurance and enhancement;
- help to build institutional capacity for high quality internal review and enhancement”.

5 In line with this mission, it is EQ-Arts’ vision to become “the leading provider of quality assurance and enhancement services to higher education institutions in the CPAD sector in Europe”, setting benchmark standards for the disciplinary field – while recognising academic and cultural diversity – as well as ensuring and advancing the quality of both academic provision and the student learning experience are core objectives of EQ-Arts QA policies. Becoming a trusted contributor to the CPAD
10 sector while “working constructively and efficiently with higher education institutions and national agencies” is presented as a driving motivation for its EQA activities. EQ-Arts does not limit its role to the first and second cycle HE but extends it to “the sector’s capacity for high quality third cycle provision” and a valuable transfer back from CPAD research into curriculum development.

15 Hence, the EQA activities of EQ-Arts are aimed to practically implement what the agency considers its vision and mission. Key values such as trust, independence, fairness, consistency and transparency are viewed by EQ-Arts as guiding its standards and procedures, thus transforming its mission and vision into the day-to-day work of quality enhancement in the HAE sector. This has been operationalised in the “EQ-Arts Strategic Plan: 2022-2026” (Annex 3 to the SER), outlining the focus areas of the the agency’s activities for the indicated period, and “EQ-Arts Draft Operational Plan 2022-24” (Annex 2 to
20 the SER), which aligns strategic priorities with the responsible actors within the agency.

In its EQA activities, EQ-Arts differentiates between enhancement and assessment activities both undertaken at either institutional or programme levels. These activities are described and defined in terms of aims, scope, level, and methods in the revised “EQ-Arts Governance Framework” of April 2021 (hereafter GF, paras. 7-10). The respective sections refer to the level, which the procedures
25 address (institutional, unit, programme, joint-collaborative, para. 7 GF), the methods applied (“assessment” and “evaluation”, para. 8 GF), and the difference of type: *assessment* procedures (“accreditation” resp. “revalidation”, para. 9 GF) vs. *enhancement* procedures (“review”, “audit”, and “benchmarking”, para. 10 GF).

30 In its SER, EQ-Arts points out that both accreditation (“assessment” in the terminology of EQ-Arts) and enhancement procedures are based on a systematic and formal process to gather and analyse quantitative as well as qualitative information about an institution, an individual programme or research activity. The process is targeted towards assessing the extent to which an institution, a programme or research activity is compliant with either EQ-Arts’ own standards or national standards of the commissioning institution (or both), or, alternatively, jointly agreed standards. EQ-Arts claims
35 to have thoroughly developed its standards and procedural guidelines over years of experience and to regularly monitor them. Consistent application and monitoring as well as a flexible response to the demands of the CPAD sector reportedly ensure the currency of its EQA framework, thereby systematically taking into account the feedback from the internal and external stakeholders (reviewers, Board members, Higher Education Institutions (hereafter HEI), cooperating institutions and agencies, as well as project partners).
40

Evolving from the European League of Institutes of the Arts (ELIA), EQ-Arts maintains close contacts with the European arts community, especially with major networks such as MusiQue, CUMULUS, Cilect, Paradox, but also with QA agencies (e.g., NVAO) or wider subject-related networks engaged in creating subject-specific QA frameworks (EASPA).

EQ Arts presented an overview about the EQA procedures it has undertaken since its establishment as an independent company under Dutch law (“Stichting”, see next standard ESG 3.2) in 2015, which shows a distribution of 24% assessment/accreditation procedures (5) compared to 76% enhancement procedures (16). Since its first EQAR registration in 2021, it has been solely responsible for only one assessment/accreditation procedure. For the two other accreditation procedures within this period, formal responsibility lies with another EQAR registered agency. EQ-Arts gathered experience particularly in quality enhancement procedures before becoming an independent organisation and being registered by EQAR for the first time in 2021. Assessment/accreditation procedures before then were conducted in cooperation with and under the lead of EQAR-registered agencies such as MusiQue or AQ Austria (see following table).

Quality Assessment and Enhancement Review Activities 1996 - 2022

Date	Event	Quality Assurance (formal assessment) exercises	Quality Enhancement exercises	If Joint Exercises, lead agency shown in bold type	Published Reports (* pending)	Follow-up Reports (* pending)
2022	EPAC	✓			✓	
2021	Royal Academy of Fine Arts Antwerp		✓	MusiQue	✓	✓
2020	EQAR undertakes a focussed review and awards EQ-Arts accredited standing					
2020	The Janáček Academy of Music and Performing Arts (JAMU), Brno — Czech Republic	✓	✓	MusiQue	✓	✓
2019	Willem de Kooning Academie, Rotterdam — The Netherlands	✓			✓	✓
2019	Piet Zwart Institute, Rotterdam — The Netherlands	✓			✓	✓
2019	Tomas Bata University (Faculty of Multimedia Communications), Zlín — Czech Republic	✓	✓		✓	✓
2019	Brno University of Technology, Faculty of Fine Arts Brno — Czech Republic	✓	✓		✓	✓*
2019	Jan Evangelista Purkyně University (Faculty of Art and Design), Usti nad Labem — Czech Republic	✓	✓		✓	✓*
2019	Technical University of Liberec (Faculty of Art and Architecture), Liberec — Czech Republic	✓	✓		✓	✓*
2019	EQAR rejects EQ-Arts application for accredited standing	3	6	2	9	8
2019	Zurich University of the Arts, Zurich — Switzerland	✓	✓	MusiQue		
2019	Zurich University of the Arts, Zurich — Switzerland	✓				
2019	AKV St. Joost, Den Bosch — The Netherlands (2019)	✓				
2018	The Royal Academy of Fine Arts (KASK), Ghent — Belgium	✓			✓	✓*
2018	The Academy of Performing Arts (AMU), Prague — Czech Republic	✓			✓	✓*
2018	Academy of Arts, Architecture and Design (UMPRUM), Prague — Czech Republic	✓			✓	✓*
2018	Iceland Academy of the Arts, Reykjavik — Iceland (2018)	✓				
2017	EQ-Arts submits an application to EQAR for accredited standing	7			3	3
2017	Willem de Kooning Academie, Rotterdam — The Netherlands	✓			✓	
2017	Universität für künstlerische und industrielle Gestaltung Linz — Austria	✓	✓	AQ Austria	✓	✓
2017	Kazakh National University of Arts (KazNUA), Astana — Kazakhstan	✓	✓	MusiQue	✓	
2017	AKV St. Joost, Den Bosch — The Netherlands (2017)	✓				
2017	Hogeschool voor de Kunsten Utrecht — The Netherlands (2017)	✓				
2015	EQ-Arts established as an independent company under Dutch law (Stichting)	2	3	2	3	1
2014	Vilnius College of Design — Lithuania	✓	✓	SKVC	✓	
2013	National University of the Arts Vilnius — Lithuania	✓	✓	SKVC	✓	
2013	Siauliai University — Lithuania	✓	✓	SKVC	✓	
2013	Klaipeda University — Lithuania	✓	✓	SKVC	✓	
2013	The Vilnius Academy of Fine Arts (Kaunas Faculty), Vilnius — Lithuania	✓	✓	SKVC	✓	
2013	Iceland Academy of Arts, Reykjavik — Iceland (2013)	✓				
2012	National University of the Arts “George Enescu”, Iași, — Romania	✓	✓	EUA	✓	
2012	The Academy of Performing Arts (Theatre Faculty), Prague — Czech Republic	✓			✓	
2012	Willem de Kooning Academie, Rotterdam — The Netherlands	✓				
2012	International Academy of Arts, Ramallah — Palestine	✓	✓	KHIO	✓	
2010	Brno University of Technology (Faculty of Fine Art), Brno — Czech Republic	✓	✓		✓	✓
2010	University of Art & Design, Cluj—Napoca — Romania	✓	✓		✓	
2010	National Academy for Theatre and Film Arts, Sofia — Bulgaria	✓	✓	Artesnet	✓	✓
2010	Faculty of Fine Art, Akdeniz University, Antalya — Turkey	✓	✓		✓	
2008	Faculty of Fine Art, Akdeniz University, Antalya — Turkey	✓	✓		✓	
2007	Brno University of Technology, Faculty of Fine Art — Czech Republic	✓	✓		✓	✓
2007	Lithuanian Academy of Music and Theatre, Vilnius — Lithuania	✓	✓		✓	✓
2007	International Academy of Arts, Ramallah — Palestine	✓	✓	KHIO	✓	
2007	UdK Berlin — Germany (2007)	✓				
2006	University of Art & Design, Cluj—Napoca — Romania	✓	✓	Interartes	✓	
2006	National Academy for Theatre and Film Arts, Sofia — Bulgaria	✓	✓		✓	✓
1996	EQ-Arts established under the EC Thematic Network in the Arts within ELIA	4	17	10	19	5
		9	33	14	34	17

Source: Annex 8 to EQ-Arts’ SER.

In addition to its EQA procedures, EQ-Arts makes a significant contribution in a series of EQA-related activities such as expert trainings, QA workshops or thematic sessions at international conferences. In addition, the SER lists QA-related European projects with EQ-Arts acting as either partner or coordinating institution. Whilst clearly contributing to the quality enhancement of the teaching and learning process, these activities are outside the scope of the ESG – as agreed in the Terms of Reference.⁴

Analysis

The review panel acknowledges EQ-Arts' clear and explicit goals and objectives, which align with the core principles of the ESG. The agency's commitment to fostering a quality culture and considering stakeholders' needs demonstrates its dedication to promoting excellence in the CPAD sector. This is all the more valuable as the panel also recognises that the CPAD sector is a complicated one, particularly in terms of measuring quality and learning outcomes.

EQ-Arts effectively integrates its goals into its daily work, in particular through its commitment to continuously developing and monitoring its standards and procedural guidelines. The agency's focus on consistent application of and flexibility in adjusting its EQA framework demonstrates the commitment to compliance with the ESG and the effort to collaborate efficiently with higher education institutions and other stakeholders. The panel recognizes EQ-Arts' efforts to maintain close contact with major networks and QA agencies in the arts community, which enhances its ability to incorporate different perspectives in its day-to-day operations.

The panel is impressed by the breadth of EQ-Arts' QA activities, especially in view of the comparatively small size of the agency, its permanent staff and annual turnover. The multiplicity of the agency's QA activities (EQA procedures, workshops, trainings, projects, publications, etc.) is clearly focused towards the core principals, vision and mission in relation to the establishment of a quality culture in the Higher Arts education sector and the quality enhancement of the provision of Higher Arts education.

In particular, the focus of EQ-Arts EQA activities directly reflects the institutional origins of the agency. Evolving from ELIA – itself being the result of an EC/EU funded Thematic Network Project –, the systematic development and implementation of the QA review scheme within the Higher Arts community (framework, processes, and protocols) has been a focal point from the beginning; EQ-Arts' roots in ELIA to some extent explain the importance of its "enhancement-led quality assurance" approach (para. 1.2 GF). Consequently, the agency sees itself primarily as a service provider supporting HAE institutions in further developing their IQA through providing different EQA procedures ("assessment" or "enhancement procedures", respectively).

Concerning these types of EQA procedures, EQ-Arts has put considerable efforts in defining, operationalising, and procedurally differentiating two major categories of EQA activities within the scope of the ESG. Three consecutive paragraphs of the Governance Framework (paras. 8 "Methods", 9 "Assessment", and 10 "Enhancement") address the issue of terminology with respect to method, procedure and type. The review panel considers these definitions in need of improvement. The observations of some EQ-Arts reviewers regarding the difference between Assessment and

⁴ Terms of reference – External review of EQ-Arts against the ESG as of 2023-01-06, p. 2.

Enhancement procedures during the interviews on-site confirm the panel's concern. The reasons seem to be multifaceted:

- 5 a) If "assessment" and "evaluation" are defined as interconnected *methods*, with "evaluations" being "based on the evidence resulting from assessment processes" and evaluation processes "leading to quality judgements that underpin the recommendations made in all reports provided by EQ-Arts", then these methods are obviously applied in both types of EQA procedures EQ-Arts employs: Accreditation and Enhancement (para. 8.1 GF).

This causes confusion. In particular, the review panel feels that using the term "assessment" in both a methodological and a typological sense is problematic and unclear.

- 10 b) It is also confusing practice to employ procedural categories such as "review", "audit" and "benchmarking" as signature terms for the definition of EQ-Arts' understanding of "Enhancement" procedures, given that "reviews" and "audits" are commonplace in describing "Accreditation" procedures as well (para 10.1 GF).

15 EQ-Arts' use of a distinct terminology, ensuring consistent description of EQA activities is commendable in principle. However, agencies are "responsible for [their] own terminology, [...] able to demonstrate that the terms [they] use[...] are clearly defined, and that there is no risk of confusion whatsoever between external quality assurance within the scope of the ESG and other activities". They are required to "apply special care to avoid confusion if and when they use the typical terms 'evaluation', 'review', 'audit', 'assessment' or 'accreditation' [...] for activities outside the scope of the ESG".⁵ The panel understands that in the case of EQ-Arts only the assessment procedure and the review as a type of enhancement procedure are covered by the standards of ESG. Benchmark and audit are tailor-made procedures at the request of the commissioning institution, as confirmed by EQ-Arts during the site visit.

25 The way, EQ Arts is contrasting "Assessment" and "Enhancement", however, is not only confusing in terms of terminology. It also undermines the agency's approach to differentiate EQA procedures related to teaching and learning and, at the same time, to distinguish them from consultancy services with similar aims.

30 EQ-Arts has formally committed itself not to "accept, or enter into, exclusive contracts with individual institutions for paid 'consultancy'. This applies to all requests where the purpose is to prepare for a forthcoming formal assessment to be carried out by EQ-Arts or to improve the academic provision to create a competitive advantage that would compromise the ability of EQ-Arts to form an independent judgement on the quality of that provision" (para. 5.2 GF). However, the review panel questions whether this exclusion eliminates any risk of conflicting interests in cases where "the same higher education institutions might undergo an enhancement review first and request a formal assessment later".⁶ This remains an open question in the opinion of the review panel. The definitions in the EQ-Arts' Governance Framework are of little help in providing a clear answer.

40 When addressing EQ-Arts' practices in this regard, its record of EQA activities shows a consistent, albeit small number of procedures per year, with a peak in 2019 and a sharp decline during the COVID-19 pandemic. The numbers have only been slowly recovering since. It is particularly noteworthy that EQ-Arts has completed only one formal assessment/accreditation procedure in its own responsibility

⁵ Annex 2: Guiding principles for the separation between agencies' activities, EQAR, RC/12.1 as of 04/09/2020, no 2 and 3.

⁶ Approval of the Application by Enhancing Quality in the Arts (EQ-Arts) for Inclusion on the Register, Decision by the EQAR Register Committee, RC29/A103, 24/03/2021, no 19.

(École Professionnelle des Arts Contemporains, EPAC). The agency aims to increase the number of accreditation procedures since being registered by EQAR, but this has not materialized yet. The vast majority of its procedures belong to the category of enhancement procedures. After EQ-Arts' establishment as an autonomous organization, nearly all of these procedures have been conducted according to the agency's own standards and criteria. Even though enhancement procedures, by definition, do not lead to formal decisions, the published reports nevertheless comprise a summary chapter detailing the degree of compliance for each standard. The categorical difference between both types of EQA procedures in this sense is rather small, which is not least reflected in the fact that EQ-Arts, after the latest revision of its standards and criteria, uses only one set of standards for all EQA procedures, whether related to enhancement or assessment, institutions, units, or (joint) programmes.

Analogous procedures, standards, and indicated outcomes thus give urgency to the question of possible consecutive enhancement and accreditation procedures of the same HAE institutions. Such constellations could be conceived as a transformation of an enhancement into an accreditation procedure, which would not necessarily lead to a conflict of interest. The review panel did not get a clear picture of how the agency would handle such cases, and the Governance Framework does not provide a clear answer in this respect. Since, according to this document, the enhancement procedures also include consultative EQA procedures in a broader sense, such as "benchmarking", the review panel sees a need to make a more meaningful and transparent distinction between its core EQA activities (accreditation and enhancement) and its bespoke activities.

Regarding the other fields of activities and, in particular, EQ-Arts' significant engagement in a series of European projects, the review panel agrees that the agency's participation in projects related to quality assurance in the HAE field is proof of the agency's strong internationalization policy and a source of additional revenue. Moreover, the panel members support the argument of a strong link between EQ-Arts' projects and QA activities, as highlighted by the Executive Office. Both aspects are interconnected and reinforce each other. Projects serve as a sounding base and strengthen the holistic approach to quality assurance, which has been at the core of EQ-Arts' founding principles. In that sense, all projects are geared towards quality assurance and its continuous improvement. The transnational and interdisciplinary nature of the projects presents a delicate balancing act in maintaining independence and balance. Nonetheless, given the aim of EQ-Arts, to be listed in the EQAR, and the very low volume of EQA activities in recent years, the review panel strongly recommends that core EQA activities be prioritised and, where possible, increased.

In summary, the range of EQ-Arts' QA and enhancement activities, particularly its role in supporting stakeholders, is commendable. However, since the formal EQAR registration in 2021, the agency has carried out a rather small number of assessment/accreditation procedures under its sole responsibility (in fact, only one). It could therefore improve by prioritizing and increasing its core EQA activities, while making efforts to distinguish these activities more transparently from those that are tailor-made.

Panel final assessment after statement and additional information by EQ-Arts

1. The review panel is grateful for EQ-Arts' critical analysis and suggestions on its judgement of compliance with the standard. It acknowledges, as it did in the preliminary assessment, EQ-Arts' considerable experience in conducting accreditation and enhancement procedures. This recognition is particularly significant due to the vast majority of procedures performed by EQ-Arts being

enhancement-based. The resoluteness of EQ Arts' Board and EO to increase its assessment and enhancement activities in the medium and long term is not doubted. Since EQ-Arts applies the same criteria and uses mostly similar processes for both types of EQA procedures, they both contribute to the EQA capabilities of the agency. Similarly, EQ-Arts' engagement with a range of EU projects related to different aspects of QA in the arts sector is noted.

2. However, expectations of a significant increase of accreditation/revalidation and enhancement procedures in the post COVID 19 era have not materialised so far. Furthermore, while it could be argued that all QA agencies faced challenges during the pandemic, it should be noted that many of them significantly mitigated the negative impact of COVID-19 by swiftly transitioning to virtual procedures. Despite similar efforts by EQ-Arts, to date this has not resulted in an increase in accreditation/revalidation procedures.

3. The panel observes that EQ-Arts is participating extensively in quality assurance (QA) projects within its sector. The sector clearly appreciates the agency's role, as highlighted by external invitations for participation. However, this activity may come at the expense of prioritizing its EQA activities and making concerted efforts to capitalize on what is understood to be a substantial Higher Arts Education (HAE) market. As a result, the panel maintains the relevant part of the recommendation provided below, specifically the suggestion that the agency should prioritize and increase its core EQA activities.

4. Concerning the terminology applied for its EQA procedures ("assessment / evaluation", "assessment / enhancement", "accreditation / revalidation", "review" / "audit" / "benchmarking") and the panel's concern about potential confusion, EQ-Arts finds this undisputed by either the stakeholders or experts of the prior registration procedure or the EQAR Register Committee and, hence, questions the related criticism of the present review panel. Although this opinion may claim some face validity, it does not address the point raised by the panel. During the auditing process, EQ-Arts representatives focused their comments on the EQA procedures by distinguishing them based on the assessment (accreditation) / enhancement differentiation. The panel finds this reasoning comprehensible and indicative of the assumption that the other terms are hardly relevant in the communication with experts or clients.

5. EQ-Arts claims to have clearly defined the mentioned terms in several subsequent paragraphs of its Governance Framework (para. 8 – 10). The panel's objection here is that upon close examination of these definitions, they do not lead to an easy or precise understanding of what the terms are supposed to mean; instead, they tend to confuse the matter. This applies to the initially distinct but obviously closely interconnected "methods" of "assessment" and "evaluation" (para. 8 GF) and the simultaneously typological and methodological dimension of the category "assessment" (paras. 8 and 9 GF). This also holds true for the use of procedural terms like "review" and "audit" to define the enhancement type of EQA activities (para. 10 GF), which are not sharply distinguished categories either.

6. Although EQ-Arts removed the "benchmarking" type of quality enhancement from the definition paragraph (para. 10 GF) in the revised version of its Governance Framework, the panel is not sure whether such "tailor-made" procedures (available upon request) will continue to be offered by EQ-Arts as a service to client institutions. This is an example, where the impact of a change in the Governance Framework could not be observed in practice. Further, there are no distinguishing indicators in comparison to the ESG-relevant enhancement procedures, especially when considering that assessment and enhancement procedures are primarily conducted according to the same EQ-Arts standards and criteria. Regarding the clarity and significance of the differentiation between ESG-relevant and tailor-made QA activities by EQ-Arts, the review panel still sees room for improvement

and confirms a recommendation to clearly distinguish between ESG-covered activities (accreditation, enhancement review) and other activities (benchmark) that are customized.

7. In the light of the remaining issues (prioritisation of core EQA activities, clear and unmistakable terminology), particularly with respect to the importance of making additional efforts to increase the volume of core EQA activities, the review team considers EQ-Arts being only partially compliant with ESG 3.1.

Panel commendations

EQ-Arts is commended for the range of its Quality Assurance and Enhancement activities, in particular, the role it takes in supporting stakeholder organisations within the European Higher Arts sector and training experts to support the ‘players of tomorrow’.

Panel recommendations

It is recommended that the agency prioritises and increases its core EQA activities and clearly distinguishes between ESG covered activities (accreditation, enhancement review) and other activities (benchmark), which are ‘tailor-made’.

Panel conclusion: *partially compliant*

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

2018 review recommendations

None

Evidence

In 2015, EQ-Arts has been established as an independent non-for-profit foundation (“Stichting”) in the Netherlands, registered at the Chamber of Commerce in Amsterdam. The related Statutes have been presented to the review panel (Annex 11 to the SER). Based on this national recognition and legal status, EQ-Arts claims to be the “only accredited body in Europe to serve the entire spectrum of the CPAD sector”. Despite the Dutch legal basis, EQ-Arts extends its EQA activities internationally to all EHEA countries. If needed or legally required, it cooperates with other accreditation bodies in the field, such as MusiQue or national accreditation bodies, such as NVAO from the Netherlands or AQ Austria.

EQ-Arts has also used its legal status as a recognised QA organisation to engage in European projects such as 3rd cycle in the arts, learning outcomes, quality frameworks and assessment frameworks (e.g. Creator Doctus, CYANOTYPES, CALOHEX projects). The major aim of these efforts is always, as the agency puts it, to build trust not only in the quality of HAE, but also in the agency's contribution to assuring and enhancing it.

Analysis

The review panel notes that EQ-Arts is a Foundation. Under Dutch law it is thus the EQ-Arts Board of Directors who is responsible for the activities of the agency and their outcomes.

The Statutes of the Foundation were drawn up by a notary in Amsterdam (Voorwinde Notariaat), but have been revised in 2018 to remove some initial errors. Changes in the structure of the Board (number of Board members, Executive Group, Accreditation Board), which have resulted from the major revision of the EQ-Arts Governance Framework in 2021, are not yet included in the Statutes. In 2019, for instance, the number of Board members has been increased and the Board and its Executive Group were merged. EQ-Arts representatives stated in the meetings with the review panel that the focus of the reform has been primarily on the procedural aspect of the governance structure, leading to a revision of the Governance Framework rather than the Statutes; the review panel however suggests a revision of the Statutes would be n.

The review panel members recognise EQ-Arts' contribution to the HAE sectors' QA and quality enhancement through cooperation with other QA agencies and bodies (national and international). The panel also recognises that the agency has signed CAs with major stakeholders like CUMULUS, Cilect or ESU, thus formalising its networking activities.

Panel final assessment after statement and additional information by EQ-Arts

1. The review panel considers EQ-Arts compliant with the standard.
2. It nevertheless reiterates the above indicated inconsistencies between the core documents of the agency, the (constitutive) Statutes and the (operational) Governance Framework. These inconsistencies do not affect the compliance judgement but should be removed anyway for the purpose of consistency of core documents of EQ-Arts.

Panel recommendations

None

Panel suggestions for further improvement

EQ-Arts is advised to revise and adjust the Statutes of Foundation in accordance with the revised Governance Framework and, in particular, with respect to the structure of the EQ-Arts Board.

Panel conclusion: *compliant*

ESG 3.3 INDEPENDENCE

Standard:

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

5

2021 focused review recommendations

None

Evidence

10 Para 14.1 GF of EQ-Arts explicitly states, “All activities undertaken by EQ-Arts will be independent, impartial and free from potential conflicts of interest or perceptions of such a conflict”. Similar governance commitments can be found in the “Integrity” and “Ethics” sections of this document (paras. 5.4 and 6.2 GF).

15 According to the ESG, the independence and correspondent autonomy of the agency in pursuing its EQA activities need to be ensured in three dimensions:

- a) *Organisational independence* in the sense that the agency is working independent of third parties, such as higher education institutions, governments and/or other stakeholders.
- b) *Operational independence* meaning that the agency’s procedures and methods, including the nomination and appointment of experts, are operated without any intervention of third parties as, for instance, higher education institutions, governments or the like.
- 20 c) *Independence of outcomes*, relating to the results of QA procedures that must not be compromised by the affiliation of experts to external nominating bodies or conflicts of interest of experts participating in the agency’s decision-making.

Ad a) Organisational independence

25 EQ-Arts has been established as an independent non-for-profit organisation under Dutch law in 2015. The agency through this legal action has separated from its affiliation with ELIA formally and institutionally, with which it, however, still keeps close ties. In particular, this network has been the primary source for nominating the members of the first Board of Directors after the founding act in 2015.

30 According to the foundation statutes (hereafter FS), the Board consists of at least five members and it may appoint no more than four additional members (Art. 4a FS). The maximum number of Board members has been increased in the meantime, the actual Board consisting of altogether 15 members (including the *ex officio* members of the Executive Office (3); see para. 20.3 GF). Members are appointed for a period of three years and their mandate may be renewed for up to three times (or
35 or nine years at a maximum). The Board members appointed first are to resign on a phased basis (Article 4a FS). After its initial constitution, the Board is a self-recruiting body with an open and transparent nomination and appointment process. New Board members should thus be nominated in an open, transparent nomination process from all stakeholder groups in the CPAD sector identified by EQ-Arts. By regularly scrutinizing the scope of expertise in the Board (“skills audits”, para. 20.7 GF), targeted
40 calls, nominations and appointments to the Board should be facilitated (paras. 20.3 and 20.8 GF).

Ad b) Operational independence

According to the legal framework of EQ-Arts, the operational independence of the agency in the first-place rests with its governing body, the Board. The Board is supposed to invite three sectoral organisational representatives to attend Board meetings, who have an advisory function but no voting rights (Art. 4e FS; in the present Board, these are representatives from AEC, CUMULUS and CILECT). The statutes require the chair, the treasurer and the secretary to be appointed by the Board amongst its members. Further, the Board appoints the agency's Chief Executive Officer (CEO) and General Manager, both of whom are non-voting *ex-officio* members (para. 20.3 GF).

The Board, as governing body of EQ-Arts, takes statutory responsibility for “the

- effective implementation and continuous review of the Governance Framework set out here;
- planning of external, independent, periodic reviews of the Board's own performance;
- approval of annual reports/accounts and the appointment of annual auditors;
- preparation and monitoring of a five-year strategic plan;
- approval and monitoring of annual business and operational plans;
- final decision making in all the Board's formal assessment and accreditation processes;
- signing-off of final reports concerning all of the Board's quality assurance activities;
- researching and approving periodic trend analyses drawn from the Board's activities;
- scrutinising and approving applications to join the Board's Register of Peer Reviewers;
- approving the appointment of Review Team Chairs and Members;
- instigating independent reviews of complaints or appeals concerning the Board's activities;
- convening occasional or standing sub-committees and working groups to assist in the Board's work;
- identifying and selecting new Board members and electing a chair” (cf. para. 20.2 GF).

Ad c) Independence of outcomes

Since the Board is EQ-Arts' sole decision-making body not only with regard to all issues related to governance, budget, strategy and policies, but also concerning the final outcomes of the agency's EQA procedures, the Governance Framework stipulates compliance rules for Board members participating as reviewers in such procedures. In particular, it is required that “throughout their period of tenure on the Board none of its members shall undertake paid work with an institution commissioning the services of EQ-Arts and must declare any such consultancy arrangements prior to their membership of the Board as a major conflict of interest” (para. 20.5 GF)

In line with the Governance Framework, the Board has established three sub-committees: a) an Enhancement and Accreditation Sub-Committee (hereafter EAC), b) a Finance and Business Sub-Committee, and c) a Governance Sub-Committee, with each of them taking up specified tasks and making preparatory work on behalf of the Board. The Governance Framework ascribes EAC appointed “Enhancement and Accreditation Panels” (hereafter EAP)⁷ – comprising two Board members for each procedure – a crucial role in the reporting and decision-making process. EAPs will be asked for their consideration and comments to the draft review report before it is sent to the higher education institution to check factual accuracy. Further, on recommendation of EAC the Board will endorse the final draft report and its potential outcomes before re-submitting it to the institution (para. 16.3 GF).

⁷ The involvement of EAPs in the process along with a modification of the respective paragraph of the Governance Framework has been announced by EQ-Arts after the site visit (see under ESG 2.6 for details).

Analysis

a) *Organisational Independence*

5 Concerning the organisational independence, the review panel takes note of the non-governmental status of EQ-Arts as well as the composition of the Board and the rules of nominating and appointing new Board members. These rules convincingly provide evidence of a skills- and competence-driven selection process. As pointed out during the site visit, nominations come from different networks, including academics from various HEIs and, in particular, students who are regularly involved in the Board through EQ-Arts cooperation with ESU. Representatives of EQ-Arts also demonstrated during 10 the site visit that the focus is always on achieving and maintaining diversity in the Board. In addition, EQ-Arts states that members of the Board are appointed in a personal capacity, that is, no Board member is there to represent the interests of an organisation, agency or institution (para. 20.1 GF). The review panel confirms that EQ-Arts has proven its organisational independence.

15 The review panel in this context also considers the suggestion of EQAR's Register Committee in its recent approval decision that EQ-Arts might reach out to its (nominating) stakeholder organisations not only in the course of their first nomination but also for the purpose of re-appointments in order to continue and strengthen the ties with them.⁸ So far, EQ-Arts has not formally established a procedural rule to that end. However, the review panel is convinced that the agency's collaboration with the European Higher Arts Community, and in particular with its long-standing partner networks and organisations in the field, is so intensive and close that the issue of a forthcoming reappointment 20 of Board members in the partner organisation will hardly go unnoticed. In addition, reappointments are always subject to the consent of the Board member concerned, and it is reasonable to expect that there will be communication between that member and his or her nominating organisation. The panel members are therefore satisfied with the existing rules and do not recommend formalising them in relation to re-appointments. 25

With respect to the important distinction between voting and non-voting members in the Board, the information provided in various places is somewhat unclear. 12 persons are named on the website of EQ-Arts and 11 listed in the 2023 Governance Framework (both presentations leaving out the *ex-officio* members of EQ-Arts headquarters). However, as all are registered as *members* of the Board, it 30 remains unclear which of them act as "observers" (para. 20.3 GF) and what this means with regard to the allocation of voting rights. The review panel recommends clarifying this accordingly.

b) *Operational Independence*

35 From the panel's perspective, the same principles also ensure the *operational independence* of the agency. Since the Board is the sole decision-making body, all major governance decisions are within the remit and responsibility of the Board. As protocols, procedures, standards and criteria, and reviewers are essential components of the assessment and enhancement activities of EQ-Arts, this also applies to the appointment of EQ-Arts reviewers as well as to the final approval of the agency's standards. The responsibility for the final approval of standards, criteria and procedural guidelines is however implied in the general decision-making powers of the Board. The review panel advises EQ- 40 Arts to make explicit the Board's remit in the Governance Framework accordingly.

⁸ Approval of the Application by Enhancing Quality in the Arts (EQ-Arts) for Inclusion on the Register, EQAR Register Committee, RC29/A103, No 24.

c) *Independence of Outcomes*

As part of EQ-Arts' impartiality policy (concerning the *independence of outcomes*), Board members are required to declare and keep up to date instances of (major or minor) conflicts of interest (para 14.2 GF). Board members are consequently excluded from participating in EQA procedures at HEIs where they are employed or having a working relationship. EQ-Arts Board members and Executive Officers during the interviews emphasise the importance of these provisions. The panel would recommend EQ-Arts communicates this more clearly and explicitly in all its documentation.

In addition, the panel discussed with the EQ-Arts representatives the role of the Board members involved in the EQA procedures. The panel members learned that the agency's review panel chairs are – as a rule – experienced board members who are seen as contributing in this way to the appropriateness, suitability and consistency of the outcomes of the process, whether these are formal accreditation decisions or recommendations for improvement in an enhancement procedure. While the review panel understands the benefit of experienced chairpersons in EQ-Arts review teams, it is concerned that the independence of the outcomes may be negatively affected by this practice. Both the strong position of the chair in EQ-Arts review panels, the process and drafting of the report, and the involvement of the Board in commenting on the report from the first draft, give the Board significant influence in shaping the outcomes, while the independent voice of the remaining review team members could be marginalised. Board members who chaired a review team formally refrain from participation in the decision-making in the board, but this does not necessarily prevent a form of informal influence. Although the review panel notes that there is no concrete evidence of negative experiences, either on the part of EQ-Arts reviewers or on the part of the HEIs reviewed, noting EQAR's policy on this, it considers the participation of Board members in review teams ill advised in terms of the independence of results and strongly recommends changing it.

EQ-Arts has carried out a considerable number of EQA procedures in cooperation with partner agencies or national agencies. The review panel questions whether and how the underlying standards, outcomes and decision-making bodies are clearly communicated in concrete procedures. EQ-Arts' policy on such collaborations is presented on its website. There it is clearly stated that a Cooperation Agreement (CA) should be drawn up to provide "clarity on the division of workload, cost-sharing, requirements for the expertise of panel members, the process by which panel members will be selected, the guidelines, templates and procedures that will be used, and which accreditation body will make the final decision on accreditation".⁹ After reviewing the reports of such collaborations, the panel members are able to see that in the case of collaborations with other EQA organisations, EQ-Arts' reports carefully describe the underlying criteria in introductory sections. In addition, it is made clear whether EQ-Arts only carries out the review and makes recommendations to the decision-making body of the partner organisation, or whether its own board makes decisions together with the decision-making body of its partner organisation. Decisions will also be published separately.¹⁰

The low volume of 'stand alone' activities since 2019 is another concern in terms of independence – mentioned already in the 2018 EQAR review. The situation in the interim has not changed, expectations for the future did not materialise as expected. In particular, the related fact that the agency is to some extent financially dependent on loans from its founders raises questions about EQ-

⁹ See <http://www.eq-arts.org/core-processes/collaborating-egar-registered-international-national-qae-entities/> (Access: 15.07.2023)

¹⁰ See <http://www.eq-arts.org/completed-reviews/> (Access: 15.07.2023)

Arts' independence. Although these founders have promised not to withdraw them, there is a risk of undue influence on decisions. These issues are discussed in more detail under ESG 3.5.

Panel final assessment after statement and additional information by EQ-Arts

5 1. The review panel considers EQ-Arts contestation of most of its arguments leading to a partial compliance judgement. It should be stressed that the panel's judgement – and deviation from the Register Committee's assessment in the previous EQAR registration procedure – is essentially due to the critical appraisal of the Board's predominant influence in the decision-making process (*independence of outcomes*, see further assertions below). The other issues raised in this chapter are
10 transparency issues still worth mentioning but of minor weight with respect to the overarching independence theme.

15 2. Hence, the review panel confirms its overall positive view of the *organisational independence* of EQ-Arts. In this respect, it only requests full clarity on the allocation of voting rights within the Board. EQ-Arts highlights in the Governance Framework that the ex-officio members of the Board are non-voting members, which is helpful. Ex negative, one might indeed assume that all other listed members are voting members, as EQ-Arts comments. The major source of confusion then must be attributed to the Statutes (Art. 4e), which clearly differentiate voting from non-voting members in the Board. Literally, the term "observers" in the Governance Framework seems to stem from that provision in
20 the Statutes. In addition, the panel considers the assumption that "observers" (whether elected or appointed, as outlined in para. 20.3 GF) are members with voting rights by no means a common understanding. On the contrary, it is customary to distinguish "observers" in an organization from full members, particularly due to their non-voting status. Although EQ-Arts has clarified the issue by stating that all (elected) members, whether "observers" or not, have the same voting rights, the panel still suggests either clearly indicating this usage of the category "observers" in the Governance
25 Framework or simply avoiding the term in this context altogether.

30 3. Concerning the issue of *operational independence*, the panel principally has recognized the Board's responsibility for the approval of the standards and procedure, even though this competence is not explicitly denoted in the respective paragraph of the Governance Framework. EQ-Arts almost reverses this argument, stating: "[Para 20.2 GF] clearly sets out the range of responsibilities of the Board. This includes its explicit responsibility for the 'final decision-making in all the Board's formal assessment and accreditation processes,' this is inclusive of the standards, criteria, and procedural guidelines" (EQ-Arts comments, p. 5). Strictly speaking, the phrase "all the Board's formal assessment and accreditation processes" rather *implies* the Board's authority over the development and approval of
35 the standards and criteria, as the panel has asserted in the above analysis. Since EQ-Arts' standards and criteria are a prerequisite for the Board's decision-making powers, the panel simply suggests making the implicit explicit.

40 4. With respect to the *independence of outcomes*, the panel considers EQ-Arts' argument that all possible conflicts of interest applying to potential reviewers' employment at or engagement with institutions to be reviewed are comprehensively covered the agency's non-conflict of interest policy. The panel confirms the positive analysis of this policy (para. 14 GF) and revises its preliminary notion that it should be made even more transparent throughout EQ-Arts documents. Consequently, the panel considers EQ-Arts' claim of being sufficiently clear and transparent in this public-facing core document justified. It has therefore decided to cancel the original recommendation to promote transparency in this regard.

5. In its above analysis, the review panel thoroughly discussed a potential infringement of the standard, which could be caused by the Board's influence on the assessment/accreditation processes from the beginning. Although not addressing the standard and related guidelines in a narrow sense,¹¹ the panel considers EQ-Arts' practice of regularly involving experienced Board members as chairs of review panels as well as the Board's role in the reporting process from the start a considerable risk to the *independence of outcomes*. In its comments, EQ-Arts again contests this view sharply, yet does not provide any new evidence for its position. The panel repeatedly has taken note of EQ-Arts' justification of the role of experienced chairs in concrete procedures, in particular when jointly conducted with partner agencies, and of the Board in overseeing the consistency of judgments and their compliance with the EQ-Arts standards. The panel members are nevertheless concerned about the formal and informal influence Board members could exact in their capacity as chairpersons in review teams. They are not of EQ-Arts' opinion that only concrete evidence of "Board decisions being 'negatively affected by this practice' or of any instance of 'informal influence' taking place with regards to Board decisions being taken on matters of accreditation" (EQ Arts comment, p. 4) would have given justification to their concerns. The panel considers this issue to be a structural bias, which always bears the risk of undue influence or the pretext of this – independent of any concrete evidence. The panel wishes to comment that it is very possible to have highly experienced panel members and chairs, who are not Board members (as is the normal practice in other QA agencies). The panel therefore retains its recommendation to this end, which overall leads it to judge EQ-Arts only partially compliant with the standard.

6. As to EQ-Arts apparent and understandable discontent with the panel's judgement and explicit quotation of the EQAR Register Committee positive judgement on the standard back in 2021, the panel would like to stress its obligation and full right to interpret the evidence provided independently.

Panel recommendations

Given the role of the EQ-Arts Board in the reporting and decision-making process, EQ-Arts should formally exclude Board members from taking part in accreditation/assessment procedures.

EQ-Arts should either concretise the status of "observers" within the Board or avoid using the term in this context (e.g. in the GF and on the website).

Panel suggestions for further improvement

EQ-Arts is advised to explicitly mention the Board's responsibility for the final approval of the agency's standards, criteria and procedures.

Panel conclusion: partially compliant

¹¹ Cf. Use and interpretation of the ESG for the European Register of Quality Assurance Agencies, RC/12.1, 2020, p. 14f.

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

5

2021 (focused) review recommendations

None

Evidence

10 EQ-Arts is committed to publish reports on a regular basis that describe and analyze the general findings of their EQA activities. This self-commitment has been laid down in the agency's Government Framework (para. 16.4 GF) and is further evidenced through a separate section "Thematic Analysis" on the agency's website.¹² EQ-Arts has undertaken a first comprehensive Thematic Analysis based on external quality reviews conducted between March 2017 and March 2020 (Annex 10 to the SER; available on the internet¹³). The analysis highlights commendations and recommendations across the agency's standards from 14 reviews, providing the CPAD sector with a trend analysis and critical overview to identify areas for improvement.

15
20 According to the SER, EQ-Arts actively disseminates the Thematic Analysis findings through partner networks, workshops, and conferences, aiming to consolidate a shared body of knowledge within the European HAE community on quality issues. Additionally, EQ-Arts is currently conducting a Survey Report on blended learning in the CPAD sector, focusing on successful examples of innovative approaches emerging from the COVID-19 pandemic challenges.

Furthermore, EQ-Arts is project partner in multiple European projects relating to QA in the Higher Arts education such as

- 25
- the Creator Doctus ERASMUS+ project 2019-21 aimed at writing and editing "A framework of good practices for 3rd Cycle doctoral awards in the creative and performing arts and design sector";
 - the CALOHEX, ERASMUS+ project 2020-23, with responsibility for coordinating the rewriting of the CPAD Subject Area Qualifications Reference Frameworks (QRF) for defining the programme learning outcomes of individual degree programmes of the first, second and third cycle;
 - the 'CYANOTYPES' Blueprint ERASMUS+ Alliances for Innovation project 2019-24, with the aim to establish an extensive and sustainable Strategic Skills for Creative Futures Community covering all types of stakeholders.
- 30

35 EQ-Arts' publications coming from these projects are also addressing the enhancement of the Higher Arts education and disseminated to all stakeholders of the CPAD sector.

¹² See <http://www.eq-arts.org/thematicanalysis/> (Access: 15.07.2023)

¹³ See <http://www.eq-arts.org/wp-content/uploads/2020/09/EQ-Arts-Thematic-Analysis-2017-2020-small-size.pdf> (Access: 15.07.2023)

Analysis

The review panel praises EQ-Arts for the efforts to meticulously scrutinize the effectivity, efficiency and the quality of both processes and outcomes of its EQA procedures. The first comprehensive Thematic Analysis covering the QA Activities of the years 2017 – 2020 provides impressive proof of the diligent quantitative and qualitative in depth analysis of the EQA procedures with regard to the EQ-Arts standards and the lessons to be learned from this analysis for the entire CPAD sector. A concluding section presents the main results of the analysis in an easy-to-read manner; it at the same time identifies focus areas for follow-up studies of EQ-Arts.

The review panel commends EQ-Arts' commitment to conducting thematic analyses as part of its Governance Framework, promoting a quality culture across the sector. The panel is also pleased to learn that such comprehensive analyses will be conducted in a regular three-year cycle, with the next one scheduled for 2024 (see also Annex 2: EQ-Arts Draft Operational Plan 2022-24, p. 3).

Additionally, it is well-noted that the publications resulting from EQ-Arts' project activities are widely circulated within the CPAD sector and made accessible on EQ-Arts website.

The willingness to critically reflect on their own work and contribute to a quality culture is truly commendable. With the assurance of regular thematic analyses and the wide dissemination of project publications, EQ-Arts continues to lead the way in promoting best practices and fostering growth and innovation across the sector.

Panel final assessment after statement and additional information by EQ-Arts

No further comments of the panel.

Panel commendations

EQ-Arts is commended for the quality and depth of its Thematic Analysis and the value this offers to the European Higher Arts sector and affiliated organisations. EQ-Arts is encouraged to continue this work on a regular basis and address the areas outlined in the review meetings, e.g. blended learning.

Panel recommendations

None

Panel conclusion: *compliant*

ESG 3.5 RESOURCES

Standard:

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

2018, 2021 (focused) review recommendations

The Panel recommends that EQ-Arts (also) consider the extent to which they may be able to capitalise on the high reputation of their peer reviewer-training programme by providing it more widely to other agencies / organisations, as an alternative / additional source of income. (2018)

5 *The review panel recommends EQ-Arts prioritizing the sustainability of resources; Covid 19 related changes to the resource management and to the expansion of services (online QA/E processes; focused seminars on issues derived from thematic analysis), as stated above, should be taken further into account. (2021)*

10 Evidence

In its SER, EQ-Arts reports progress and development since gaining independence in 2015, despite the challenges posed by the COVID-19 pandemic. The agency attributes its success to various strategies and approaches, particularly in managing resources effectively. The key points related to available resources are as follows:

15 Financial Resources

- *“No or Low Expense” Strategy:* This relates to a strict cost-saving approach to the agency’s operations.
- *Green Operational Management:* This relates to a reduction of travel costs for Board members and the Executive Office, emphasizing online and digital operations.
- 20 • *Collaboration and Engagement:* This relates to EQ-Arts participation in major EU/EC projects, such as Creator Doctus, CALOHEX, and CYANOTYPES, leading to diversified income streams and increased financial support.
- *Honorary engagement of EQ-Arts personnel:* This relates to significant personal contributions of Board members and the Executive Office to conduct daily operations of the agency.

25 The financial trajectory of EQ-Arts since becoming an independent legal entity in 2015 shows fluctuation, particularly evident in the significant decrease of revenues during the COVID-19 pandemic in 2020.



Source: SAR EQ-Arts (2023), p. 46

However, EQ-Arts praises itself for recovering and resuming activities in 2021 and 2022 through various measures, including a more environmentally friendly approach, virtual online modes for activities and increased collaboration in European projects.

5 *Staff Resources*

The Executive Office currently consists of three staff members: the CEO working at 0.2 full-time equivalent, the General Manager at 0.1 full-time equivalent, and the Project and Review Assistant at 0.4 full-time equivalent. All staff members are self-employed and work on a contract basis.

Facilities

10 The organisation currently works online as part of its green strategy, but – as EQ-Arts staff indicated – might consider renting spaces in Amsterdam and Brussels as possible workplaces, if the need and demand dictate in the future.

Analysis

15 *Financial resources*

The review panel is impressed by the commitment and dedication of the EQ-Arts Board and Executive Office to develop and enhance the quality culture in the HAE sector. This is all the more remarkable as the agency has a very small resource base, both financially and in terms of staff. The review panel is aware that the agency's activities depend to a considerable extent on the voluntary work of
20 "working Board members" and the willingness of staff members to significantly increase their contracted workload (per FTE) beyond remuneration. Many of the Board members commented on how supportive their employers are of their voluntary work with EQ-Arts, and how they are actively encouraged and enabled to undertake this.

25 Notwithstanding this, the overall weak and unstable financial capacity of EQ-Arts has been a major concern in the two previous EQAR reviews, as evidenced by the former review panels' related recommendations (to capitalise on highly regarded reviewer training and to prioritise the issue of sustainability).

30 After two more years of EQ-Arts' operation, the review panel considers these concerns still to be valid. The mentioned cost-effective management of its own resources, including the efficient provision of EQA services, in the medium and long run might not compensate for stagnating or even decreasing income streams. Consequently, EQ-Arts reports on efforts to spread financial risks by diversifying revenue sources. These are generated from (online) reviewer trainings, workshops in QA, and related EU/EC funded projects. Nevertheless, EQ Arts Board members and staff agree with the panels' view that EQA procedures, particularly assessment/accreditation procedures, are not only core activity
35 areas of a QA agency but also the most profitable revenue source. However, a brief glance at the number of enhancement and assessment procedures since the agency's first EQAR application in 2018 – stand-alone or with EQ-Arts collaboration – indicates that EQA activities are also the most challenging business area of EQ-Arts (12 procedures in total, with only 3 since 2020). So far, the last pre-Covid year 2019 seems to be an exception in terms of volume of activities. In the view of the
40 review panel, a continued low level of EQA procedures, be it stand-alone or in collaboration with other agencies would not only endanger the agency's financial stability and sustainability, but also pose a significant risk to its independence as a QA agency. Moreover, it would jeopardize one of EQ Arts'

main aims, namely “to be the leading provider of quality assurance and enhancement services to higher education institutions in the CPAD sector in Europe” (para. 3.1 GF).

5 EQ Arts Board and staff concede that the expected increase in assessment/accreditation activity with EQAR membership (2021) has not yet materialised. In its risk assessment, the Board Sub-Committee on Finance & Business points out that not only legal barriers in some countries hamper EQ-Arts’ cross-national EQA activities, but also difficulties in identifying specific markets for arts programmes and language barriers. In addition, the review panel learned during the site visit that while ELIA and other networks support EQ-Arts, their members do not automatically become clients. Notwithstanding this, the EQ-Arts Board and staff unanimously indicated the agency’s intention to increase the volume of
10 EQA procedures to improve the sustainability objective, while maintaining the prudent diversification approach to income generation.

15 In this context, it is worth mentioning that the negative equity of the agency is financed by long-term loans of some current and former board members (see annual accounts 2022, Annex 5 of the SER). In his ‘Going concern’ opinion, the registered accountant, commissioned by EQ-Arts, comments on this financial situation by stating that “(t)he continuity of the company depends [...] to a certain extent on the willingness of the current and former board members to continue their financial support. For this reason, there is an uncertain element or material importance based on which there could be reasonable doubt about the continuity of the activities of Stichting EQ-Arts [...]”.

20 Although the continued commitment of these Board members with vested interests appears to be beyond reasonable doubt, the review panel observes a principal risk not only in terms of undue influence on Board decisions, but also in terms of the continuity of EQ-Arts and its activities. Consolidating and increasing EQ-Arts’ funding base is therefore seen as a pressing issue.

25 The review panel is convinced that in the context of current (particularly financial) resource constraints, it is crucial for EQ-Arts to capitalise on its considerable QA experience from various projects and activities in the CPAD sector and at the same time to refocus its activities strategically. Despite resource limitations, the agency has a wealth of non-financial assets, including an excellent reputation, extensive field experience, committed Board members, and well-reputed reviewers. A business transformation leveraging these non-financial assets while monetising expertise through raising the number of assessment/accreditation procedures could strengthen EQ-Arts’ position within
30 the QA agency landscape.

35 As regards the overall financial management of EQ-Arts, the review panel explicitly lauds the revision of its Governance Framework after the EQAR registration, in particular with respect to subdividing the “working Board” into three working Sub-Committees (for Enhancement & Assessment, Finance & Business, and Governance, respectively). The domain-related tasking of the different Sub-Committees is clearly reflected in the Operational Plan 2022 – 2024 (Annex 2 to the SER). The review panel regrets that a Business Plan was not available at the time of the audit, which might had given it a more precise insight into the actual financial forecast and underlying risk analysis. The panel welcomes that the Finance & Business Subcommittee is supposed to finish work on the Business plan in autumn 2023, which members of the Sub-Committee confirmed in the audit. As the panel sees this as an
40 indispensable basis for a serious business forecast, it considers the evidence of a sustainable and realistic business plan, subject to regular revision, a necessary condition for full compliance with the standard.

Staff resources

The Review Panel commends the high level of expertise in the Executive Office and on the Board. This especially applies to the focused process of continuously maintaining and developing the Board's capacity to act as a "working Board" through its own efforts and those of the newly created Sub-Committees. The panel members are, however, of the opinion that concerning the overall financial management of the foundation, key business and financial management skills should be a major qualification requirement in the skills audit process, which is not the case presently. The panel strongly recommends ensuring that increased financial management experience and business expertise are represented on the Board.

Overall, EQ-Arts has shown dedication to its mission with limited resources and has potential for growth by strategically focusing on assessment/accreditation procedures. However, financial and human resource challenges, along with the need for key expertise on the Board and a comprehensive Business Plan, should be addressed to ensure the agency's sustainability and compliance with the standard.

Panel final assessment after statement and additional information by EQ-Arts

1. Based on the evidence gathered from the written information provided by EQ-Arts, e.g. the SER, annual accounts 2022, table of EQ-Arts' enhancement and accreditation procedures, discussions during onsite meetings, etc., the panel has duly evaluated the financial and personnel resources of EQ-Arts, the agency's financial stability, sustainability, and its perspectives in the medium and long term. In this context, the panel members highly esteem – as they did in the preliminary assessment – the remarkable personal and even financial commitment of EQ-Arts staff, which is not least reflected in the highly respectful feedback of reviewers and reviewed institutions during the meetings onsite as well as in the survey results presented by EQ-Arts together with the comments.

2. However, this does not alter the fact that EQ-Arts operates on a very narrow resource base in terms of funds and personnel and has done so for years now. Although EQ-Arts has made a virtue out of the scarcity of its financial and personnel resources, the panel is concerned that relying solely on these will not be sufficient to ensure the future of EQ-Arts as a QA agency. In particular, the exemplary commitment and enthusiasm of the current EQ-Arts staff are linked to individuals themselves and are therefore not easily transferable to the organization as a whole.

3. These considerations have inevitably led the panel to extrapolations and hypothetical scenarios. And yet they are not just "organizational advice", as EQ-Arts suggests, but essential factors to assess whether the agency can sustain and continue its EQA activities, especially during its registration period in EQAR.

4. Taking the comments by EQ-Arts into serious consideration and reflecting on its analysis of the agency's resource foundation, the panel nevertheless maintains its judgement that EQ-Arts is only partially compliant with the standards.

Panel commendations

EQ-Arts is commended for its approach to a “Working Board”, and the breadth of expertise, knowledge and currency that these colleagues contribute to the agency’s work. The Board is a unique and valuable asset, particularly in this regard.

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Panel recommendations

Whilst recognising that the COVID-19 Pandemic has had an impact on all businesses, it is highly recommended that EQ-Arts consolidate and expand its funding base in such a manner that its operation is ensured reliably and sustainably in the future. This needs to be evidenced, in the first place, by establishing a credible and sustainable financial and business plan, which is subject to annual revision.

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Further, it is recommended that EQ-Arts increases and strengthens the key competences of business planning and financial management within the Board.

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Panel conclusion: partially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

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2018 review recommendations

The Panel recommends that EQ-Arts continue its work to ensure that all “feedback loops” concerning the disseminations and actions resulting from surveys and questionnaires are formally completed.

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Evidence

In the SER as well as in the annexes and accessible documentary material published on the website of EQ-Arts, the agency addresses different levels and instruments of its IQA system:

1. *Mission, Objectives, and Strategic Plan:* In the Mission & Vision statement, the agency highlights core values, and vision, aligned to principal objectives for the period 2022-2026 outlined in its current Strategic Plan. By representation of EQ-Arts, these objectives are reviewed regularly and supported by plans for continuous improvement to ensure relevance. Operational plans are developed detailing the means and instruments to achieve the strategic objectives and a continuous monitoring of the results (see paras. 3 and 4 GF, Annex 1 to the SER; EQ-Arts DRAFT Strategic Plan 2022-2026, Annex 3 Annex 1 to the SER).
2. *Feedback Mechanisms:* EQ-Arts employs various external and internal feedback mechanisms to enhance its activities continually. These mechanisms include feedback surveys and

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questionnaires completed by trained experts and Higher Arts Education (HAE) institutions after participating in enhancement and assessment reviews. Templates of these surveys are available on the agency's website¹⁴ (see EQ-Arts Customer Satisfaction Survey, Annex 12 to the SER; EQ-Arts Expert Satisfaction Survey, Annex 13 to the SER).

- 5 3. *Engagement in International Conferences and Symposia*: Members of the Board and the Executive Office of EQ-Arts participate in international HE conferences and symposia. This engagement allows for discussions and sharing of best practices, subject-related publications, and changes in the global educational and social environments.
- 10 4. *Code of Ethics and Code of Conduct (including Equality and Diversity)*: All individuals involved in EQ-Arts' activities are bound by a Code of Ethics and Conduct, which is meant to ensure professionalism and equal treatment for everyone engaged with EQ-Arts (see paras. 6 and 21 GF, Annex 1 to the SER).
- 15 5. *Development Interviews and Competence Criteria*: Annual development interviews will be held between the Chairman of the Board, the CEO and the General Manager to review the previous year, discuss job satisfaction and set objectives for the following year. In this respect, EQ-Arts claims to have clear criteria for the selection of key personnel to ensure competence and professionalism in their roles.
- 20 6. *Process of Continuous Quality Enhancement*: In describing its core beliefs, whether in the SER, review meetings or any other document, EQ-Arts emphasises the importance of continuous quality improvement in all its activities. The institution strives to ensure that its practices are supportive, fair and aligned with its goals.
- 25 7. *Privacy Policy*: EQ-Arts has a privacy policy, which it declares to strictly follow while gathering data to enhance its activities, ensuring compliance with privacy regulations (see para. 21 GF, Annex 1 to the SER).
- 30 8. *External Evaluator*: EQ-Arts has selected an external evaluator from the HAE sector with the assignment to review its activities, including the Annual Report, on a triannual basis. The evaluator shall be independent of EQ-Arts' operations and provide comments and recommendations to the Board.

30 Apart from the SER, IQA-related annexes, and the information gathered during the site visit, EQ-Arts presents a written document listing the multitude of instruments, processes, tools, actions, and indicators to demonstrate the breadth and practicality of its IQA system.¹⁵ The document includes various governance-related IQA principles, guidelines, processes and instruments¹⁶, as well as specifications of the IQA tools used on a regular basis.¹⁷ Additionally it comprises numerous other IQA-related documents, EQ-Arts meeting formats and activities such as provision of Strategic and Operational plans, Thematic Analyses and related publications, Annual Reports, Board meetings and correspondent records/notes, including monitoring results and follow-up schemes.

¹⁴ See <http://www.eq-arts.org/downloads/> (Access: 15.07.2023)

¹⁵ *File*: Clarification of matters raised at the ASIIN EQAR Review of EQ-Arts, submitted on 21.07.2023

¹⁶ This refers, for instance, to the policies on Integrity; Ethics; Equality, Diversity & Inclusion; Privacy; definitions and practice related to impartiality and conflict of interest; processes and criteria for the reviewer-training, selection of review teams, the process of producing and endorsing the review reports and gathering feedback from commissioning institutions and/or agencies, etc.

¹⁷ Board Skills Audit for recruiting new Board members; questionnaires (review team members, reviewed institutions, trained experts after training (see annexes 7, 12 – 14 to the SER).

Analysis

Internal Quality Assurance System

5 The review panel recognises that EQ-Arts demonstrates a wealth of explicit and (even more) implicit knowledge about its processes and protocols. EQ-Arts' Mission & Vision statement and core values are embedded in a comprehensive governance scheme and operationalised in strategic and operational plans, which demonstrate a strategic direction, emphasising regular reviews for continuous improvement. The agency's commitment to feedback mechanisms, such as surveys and the involvement of an external evaluator, who has been recently appointed, highlights EQ-Arts' dedication to enhancing activities continually. As confirmed by both EQ-Arts reviewers and representatives of the HEIs reviewed by EQ-Arts, feedback is collected following the completion of enhancement or accreditation procedures and is taken into account in the further development of the agency's IQA system. However, the panel would like to see examples of survey results (from reviewers and clients) and their interpretation in order to assess whether the "feedback loop" is effectively closed.

15 The Code of Ethics and Conduct (including Equality and Diversity policies) ensures professionalism and equal treatment for all involved in EQ-Arts' activities, contributing to the integrity of the IQA system. The presence of explicit privacy policy reflects EQ-Arts' dedication to compliance with privacy regulations while ensuring transparency and trust in data gathering. Looking after the personal development of key personnel reflects a proactive approach to maintaining a competent and effective team.

20 There is no doubt that EQ-Arts is committed to developing an IQA culture by establishing the governance systems, protocols and processes, as well as the monitoring and feedback structures, that provide the appropriate basis for conducting fair, transparent and impartial EQA procedures. There is an impressive array of IQA instruments – summarised in the "Clarification of matters" document provided by EQ-Arts following the site visit –, that provide ample evidence of this. However, this does not automatically add up to a full picture of EQ-Arts' IQA, covering and clearly distinguishing the full range of activities and processes. In particular, the discussions during the site visit have confirmed that there are many IQA-related processes and practices of the Board and the Executive Office, which remain largely informal. Similarly, the systematic internal processing of related IQA observations (ensuring a closed PDCA cycle) remains unclear.

25 For instance, the structure, procedural rules and working agenda of the newly established Board Sub-Committees are still fluid and the recruitment and induction procedure of new Board members remains to be informal. Likewise, the operating processes of the Executive Office and the Board (Who does what, when, how?) are not laid down in a Quality Manual, process descriptions and/or a process chart. The review panel fully understands that the people involved in the activities of a small agency such as EQ-Arts, in particular the Executive Office and the Board, who have worked closely together for many years, develop routines and practices that work reliably without the need for formalisation. Comments of client HEIs interviewed on their perception of the performance of EQ-Arts attest to this. However, the sustainable preservation and reliable transformation of this collective body of procedural knowledge of the agency is by no way guaranteed. This is even more so in the case of a small agency, which is highly dependent on the work of a few part-time employees and persons acting in an honorary capacity.

40 The review panel therefore highly recommends that EQ-Arts ensures that it "makes the implicit explicit", through clear, consistent documentation and the communication of internal quality

assurance processes and protocols for the full range of its EQA procedures. The development of a QA manual, including process descriptions and charts, could be instrumental in achieving this goal. Clear and consistent communication is vital for transparency and understanding. In this context, EQ-Arts is advised to especially take care that information and links on its website are current and complete.

5 *Inclusion of student perspective in the IQA framework*

The review panel recognises EQ-Arts' efforts to incorporate students' perspectives into all of its activities to improve the quality of arts education and to promote the development of a culture of quality throughout the CPAD sector. In this respect, the recent increase in the number of student Board members (now two student members) is particularly estimable. The panel also notes that the question of how to adequately cover the broad spectrum of CPAD through student representation on the Board has already been raised and addressed by EQ-Arts, although tangible results have not been achieved thus far. It is suggested, for example, that consideration be given to a (funded) annual meeting involving a wider representation of CPAD students, including students who have participated in previous reviews. Such an initiative could further underline EQ-Arts' commitment to including student input in its decision-making processes.

The review panel encourages EQ-Arts to identify ways to better reflect the student perspective from across the CPAD sector, particularly from students at an early stage in their studies. Creating mechanisms for student representation and engagement will ensure that their voices are adequately considered in decision-making processes.

20 In conclusion, EQ-Arts has developed a robust IQA system with commendable strengths. By addressing the panel's recommendations and suggestions, including clear documentation and communication of internal processes, informing stakeholders about strategic direction, and reflecting the student perspective in decision-making, EQ-Arts can significantly enhance its commitment to excellence in arts education and quality assurance. The review team is convinced that implementing these improvements will elevate EQ-Arts' IQA system to even greater levels of effectiveness and impact.

Panel final assessment after statement and additional information by EQ-Arts

1. The panel takes note of a sample of results of customer and reviewer surveys as well as review follow-up reports, which EQ-Arts provided. The survey results in general confirm the very positive picture of the EQA procedures of EQ-Arts the panel received during the onsite meetings with HEI representatives and EQ-Arts reviewers. Regrettably, EQ-Arts did not add any evidence on how these results are considered internally. This may be attributed to the highly positive evaluations provided by the respondents, leaving little room for interpretation and follow-up measures aimed at implementing organizational, procedural, or substantive improvements. While the respondents in this small survey sample did identify at least some instances or made suggestions for potential improvements, it would have been valuable for the panel to understand how this feedback is internally processed (the "closing of feedback loops").

40 The panel is confident that some process is in place to ensure that the survey results are utilized for the benefit of IQA. However, as with many other internal processes that are not or barely formalized, this process remains largely informal. This underscores the panel's opinion that the extensive array of policies, documents, formal and informal processes, and activities of EQ-Arts should be presented in a more systematic, comprehensive, and, not least, explicit manner.

2. According to the comments, “EQ-Arts is confident that, while not intended to be exhaustive, its Governance Framework document provides all the essential information regarding its internal quality assurance processes and protocols for its EQA procedures and that these are appropriately documented and clearly, consistently and accurately communicated” (EQ-Arts comments, p. 8). The panel acknowledges that the Governance Framework has been primarily designed to encompass the major principles, policies, procedures, and mechanisms relevant to the IQA activities of the agency.

3. However, as EQ-Arts concedes in its statement, the Governance Framework cannot be “exhaustive” in the sense of including all internal processes of the agency. These internal processes are significant for its operation but may not necessarily affect transparency and liability towards EQ-Arts’ external stakeholders and the wider society. Acknowledging this, EQ-Arts has provided the panel with a series of IQA documentation, tools, and actions that, in its view, collectively constitute a robust IQA system.

The review panel maintains, nonetheless, that these surveys, Board and Board sub-committee reviews, plans, and reports cannot conceal the fact that certain essential information about the day-to-day operations of the EO or the procedural rules of the newly established Board sub-committees is missing. In other words, the “inner workings”, the manner in which the organization functions through its staff, Board, trainers, reviewers, etc., fundamentally remains a complex realm of highly informal routines and processes. These are not adequately documented in basic forms, such as working instructions, process descriptions, process charts, or quality manuals.

The panel reinforces its perspective that this is not solely an issue of formal deficiencies. These daily routines and procedural rules constitute the backbone of the agency’s operations and represent a “body of knowledge”. This body of knowledge simultaneously serves as the foundation for the continuity and consistency of EQ-Arts’ operations.

4. Yet the panel is not intent to push EQ-Arts to mandatorily establishing a QA manual (and related tools) for this type of collective organisational knowledge, which rather should be understood as one means to an end amongst others. In addition, with regard to the Governance Framework as EQ-Arts core public-facing document, a QA manual or equivalent process-related documentation – should it be designed – would not necessarily have to be publicly available (although this probably would serve the transparency and further raise trust of stakeholders in EQ-Arts operations). Overall, the panel continues to believe that EQ-Arts’ IQA needs further improvement due to the presence of numerous informal, undocumented routines and practices, as well as individual or collective competencies and responsibilities.

5. The panel therefore reaffirms a related recommendation and judges EQ-Arts as only partially compliant with the standard.

Panel recommendations

It is highly recommended that EQ-Arts ensures that all existing internal quality assurance processes and protocols for the full range of its EQA procedures are documented and communicated clearly, consistently and accurately. Additions to existing documents or a QA manual, including process descriptions, process charts etc., may be helpful in this respect.

Panel suggestions for further improvement

EQ-Arts is encouraged to identify ways through which the student perspective from across the CPAD sector, particularly from students at an early stage in their studies, can be better reflected and represented in the Board and the EAC.

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Panel conclusion: *partially compliant*

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

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2018 review recommendations

None

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Evidence

EQ-Arts is currently undergoing its first periodic external review for renewal on the EQAR, following an initial review conducted in 2018.

EQ-Arts emphasises continuous self-evaluation and is committed to combining internal and external review practices for all its activities. The objective is to demonstrate compliance with the ESG and its own principles and values, as set out in its mission statement.

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In addition to its commitment to renewing the EQAR registration, EQ-Arts has recently selected and appointed an external evaluator to tri-annually review material documenting EQ-Arts' activities on a triennial basis and to monitor the ESG compliance of the system. According to EQ-Arts, the external evaluator is independent but comes from the HAE sector (SER, p. 48).

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Furthermore, EQ-Arts, together with its sister QA agency MusiQue, is currently recognised as a European independent accreditation and enhancement agency for the arts. The agencies aim to enhance the quality of HAE within the EHEA and beyond.

Analysis

The review panel recognizes the efforts EQ-Arts has undertaken to demonstrate its commitment and capacity to contribute to the quality assurance and enhancement of the HAE sector. The SER, the audit process and the additional information and documentation provided during and after the audit evidence EQ-Arts' persistent strive for compliance with the ESG. The external evaluator is additional proof of EQ-Arts' commitment to regularly enhance and adapt its IQA and EQA activities in accordance with the ESG.

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Panel final assessment after statement and additional information by EQ-Arts

No further comments of the review panel.

Panel recommendations

5 *None*

Panel conclusion: *compliant*

10 **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

PREFACE

According to the agreed “Terms of Reference”, EQ-Arts subjected the following EQA activities to the external review in the framework of the application procedure for renewing its EQAR registration:

15	<i>“Institutional</i>	This will focus on the effectiveness of the institution’s own quality assurance and enhancement systems to achieve the stated aims and objectives.
	<i>Unit</i>	This will focus on the degree to which a Faculty, Department or School is delivering a range of academic provision that meets the academic objectives set out for it.
20	<i>Programme</i>	This will focus on the degree to which the following programme levels have been able to sustain and enhance their academic provision: <ul style="list-style-type: none">• Pre-degree Certificate/Diploma;• BA, MA;• PhD, Doctorate.
25	<i>Joint</i>	This may focus on a collaboration between two or more institutions seeking to offer, for example, a joint programme leading to a single academic award or, a compact arrangement between a pre-degree certificate/diploma and an undergraduate BA programme.”

30 The scope and coherence of EQ-Arts EQA activities is categorically and typologically defined in the new, revised Governance Framework (paras. 9 and 10 GF; see also the panels’ assessment to ESG 3.1). In light of EQ-Arts’ overall philosophy and approach to integrating quality assurance and quality enhancement in all of its activities, the review panel decides that it would be most appropriate and effective to make single judgements against each of the Standards that covers all mentioned areas.

35 The panel has endeavoured to differentiate its judgements for each of the areas of activity under consideration, but - as in the previous full review - has found no substantive differences between them in relation to each of the standards in Part 2 of the ESG. This is consistent with EQ-Arts’ own presentation of its services, which distinguishes EQA activities typologically (enhancement vs.

accreditation/formal assessment), but not procedurally or in terms of levels.¹⁸ Thus, it is clear that assessment/accreditation procedures differ from enhancement procedures only in terms of their formal outcomes.

Furthermore, the same procedures and standards apply at programme/joint programme and institutional/unit levels, irrespective of whether the focus is on assessment/accreditation or enhancement. Neither unit-level procedures nor collaborative-joint procedures as described above have yet been undertaken by EQ-Arts.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2018 review recommendations

The panel recommends that EQ-Arts reconsider how its Standard 7 might be more explicitly aligned with ESG 1.7.

Evidence

According to the SER, EQ Arts' focus is on enhancement-led quality assurance for HAE across the EHEA and beyond. The report indicates that the agency has been conscious of and considers the IQA processes within CPAD institutions, including their policies, processes, protocols, and their effectiveness in practice.

Thus, EQ-Arts is providing support to HAE institutions for the critical self-evaluation and enhancement of their internal quality systems. Its evaluations are then based on each institution's specific mission, vision, and strategy, as well as their approach to pedagogy and artistic research and how they relate to learning and teaching. The SER also mentions that EQ-Arts' evaluation scope always includes "relevant links to research and innovation".

As the institution evolved from ELIA and is recognised as a subject-specific QA agency, it developed its EQA processes, standards, and guidelines through quality enhancement reviews under the artesnetEurope project. The SER further notes that EQ-Arts' standards were revised in 2021 to align more transparently with the ESG.

The previous set of standards consisted of eight standards with 17 sub-sections. However, the Board approved and adopted a revised set of seven EQA standards in 2021, each with a number of different criteria, mapped to the ESG. These revised standards have been applied to the review activities since 2022.

¹⁸ Reflected on EQ-Arts' website, specifically under the rubrics "What we offer" and "Core Processes"; see <http://www.eq-arts.org/> (Access: 15.07.2023).

In addition to revising the standards, EQ-Arts reports also to having reviewed and revised its own SER and Review Report templates to strengthen the relationship between IQA and EQA processes and provide clear guidance to institutions undergoing enhancement or accreditation processes. All revised documents are publicly available on the website of the agency.¹⁹

5 The alignment of the revised framework of EQA standards to the ESG part 1 standards is demonstrated in the EQ-Arts' SER (see table in Annex 4 to this report), providing an overview of how the standards correspond to the relevant guidelines outlined in the ESG.

10 In response to the preliminary feedback of the peers during the site visit, EQ-Arts in a "Clarification of matters" document (p. 10) provided after the site visit indicated a modification of Standard 6 ("Communication"). According to this, the Standard will be supplemented in such manner that it also addresses the institutions' efforts to collect, analyse and use relevant information in support of the effective management of its programmes and other activities.

Analysis

15 The review panel notes that EQ-Arts has recently merged its different "Standards & Criteria" sets for programme and institutional level EQA procedures into one "Standards & Criteria" document to be applied to these procedures, regardless of type and level. Templates for the self-evaluation report and the review report are already publicly available on the EQ-Arts website. The new EQ-Arts Standards and Criteria have been applied once in a combined institutional/programme review in 2022 (EPAC (École Professionnelle des Arts Contemporains)).

20 An additional feature of the revised standards is that EQ-Arts has shortened the previous version in an effort to align them more closely with the ESG, resulting in a total of seven standards instead of eight in the previous version. The review panel considers the alignment of the standards with the ESG and notes that the seven standards, together with their operational criteria, essentially cover the standards in Part 1 of the ESG (1.1 – 1.10). The panel's concern that Standard 6 "Communication", as originally drafted, does not fully address the meaning of ESG Standard 1.7 *Information Management* – as it does not refer to the collection and use of quantitative and qualitative information for effective programme management – has been sufficiently addressed by the proposed addition (see above, "Clarification of matters" document). However, consideration should be given to whether the standards would still be denoted appropriately as *Communication*. In addition, evidence should be provided that the proposed change has effectively been implemented.

25 In particular, the review panel recognises that the EQ-Arts standards and criteria emphasise the autonomy of HAE institutions to develop and formulate their own quality objectives and quality assurance policies to ensure the quality of the institution and the delivery of its programmes (Standards 1 *Quality Assurance Policy* and 7 *Quality Assurance Processes*). The standards also place considerable emphasis on the student learning experience and student-centred approaches to teaching and learning, reflecting one of the key innovations of the 2015 revision of the ESG (Standards 2 *Student-centred learning*, 3 *Ensuring the student learning experience* and 5 *Learning and teaching resources*).

30 During the site visit, representatives of the reviewed institutions confirmed that EQ-Arts review processes are characterised by great care and precision, particularly in the comprehensive and

¹⁹ <http://www.eq-arts.org/downloads/> (Access: 15.07.2023)

detailed documentation. They generally confirm that they have received substantial feedback on their internal quality assurance and programme provision, making the EQ-Arts review a significant investment with a valuable return. Similarly, students who have participated in EQ-Arts-led reviews report positive experiences of reviews in which their perspectives were adequately considered.

5 Upon meticulous scrutiny of the accessible accreditation and enhancement review reports, it becomes evident that the review teams have conducted thorough and impartial analyses. These assessments reinforce the conclusion that EQ-Arts reviews not only proficiently align with the institutions' internal QA policies but also adeptly incorporate the principles outlined in ESG 1.1 – 1.10 into EQ-Arts review reports and judgements. This applies irrespective of whether the procedures lead to formal decisions
10 as in accreditation processes, or non-formal judgements as in enhancement procedures. Overall, in the eyes of the review panel the reports demonstrate a thoughtful and well-balanced approach, affirming the effectiveness of EQ-Arts' comprehensive evaluation process.

Apart from that, the review panel considers the EQ-Arts standards and criteria an essential document of obvious importance for the EQA procedures and all stakeholders, in particular EQ-Arts reviewers
15 and interested HAE institutions. However, it is difficult to find the standards and criteria on the website, as they are only available online in the templates mentioned (SER and Review Report templates), while an outdated table of the standards and criteria is hidden in the "EQ-Arts Framework for External Quality Assurance" section.²⁰ The review panel acknowledges the assertion of Board and staff members that the website revision is a constant work in progress. However, given the importance
20 of the issue, the panel suggests that the EQ-Arts standards and criteria should be disseminated and transparently published as a central document (see the panel's general recommendation on the EQ-Arts website under ESG 3.6).

In conclusion, the assessment highlights the commendable efforts made by EQ-Arts in streamlining its standards and criteria for programme and institutional level EQA procedures and aligning them with
25 the ESG. The comprehensive and student-centered approach of the reviews, along with the valuable feedback received by institutions and students, signifies the effectiveness of EQ-Arts' evaluation process. However, to further enhance accessibility, it is recommended that the EQ-Arts standards and criteria be disseminated and published as a separate central document on the website.

30 **Panel final assessment after statement and additional information by EQ-Arts**

1. The panel acknowledges the provision of the revised standards and criteria by EQ-Arts and welcomes the fact that this document has been made accessible on the internet as a single document. This signals the standards as a core document.

The panel also recognizes that the modification of standard 6, which now better matches with ESG
35 1.7, has been put into effect and that the new denotation of this standard "Communication and Information Management" (instead of "Communication") fully reflects the mentioned modification in line with ESG 1.7.

2. The panel considers the reservation concerning its judgement of compliance with the standard effectively addressed by EQ-Arts. By making the revised standards and criteria available on the

²⁰ See <http://www.eq-arts.org/wp-content/uploads/2020/07/EQ-Arts-Framework-for-EQA.pdf> (Access: 15.07.2023).

website, EQ-Arts has also constructively worked on this matter and a prior suggestion for improving on this issue can be waived.

Panel recommendations

5 *None*

Panel conclusion: *compliant*

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

10 Standard:

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

15 **2018 review recommendations**

None

Evidence

20 EQ-Arts is an arts-specific quality assurance agency that conducts EQA reviews for Higher Arts Education (HAE) institutions across the EHEA. In its EQA practice, the agency claims to consider artistic, cultural, and institutional diversity and heritage, as well as national regulatory frameworks and EQA systems. In line with that, the primary goal of the EQA assessment and enhancement reviews is to prioritize the student learning experience, from the application process to post-graduation professional development within their chosen field.

25 The agency's activities are overseen and managed by the Board of Directors made up of highly experienced education professionals, professional artists and industry experts from the CPAD sector of the EHEA. Its operations are guided by a Governance Framework, which has been revised and endorsed by the Board only recently. The Governance Framework in turn is operationalised through Strategic and Operational Plans that have been drafted for the upcoming four- respectively two-year
30 periods (Annexes 2 and 3 to the SER). EQ-Arts operates within the EHEA-wide QA framework outlined in the ESG, but remains adaptable to national frameworks where appropriate. It has undergone a process of testing, reviewing and developing its framework, resulting in a full revision of the Governance Framework and the EQ-Arts standards and criteria.²¹

²¹ Available on the internet: <http://www.eq-arts.org/wp-content/uploads/2023/06/reduced-EQ-Arts-Governance-Framework-2023.pdf> (Governance Framework); <http://www.eq-arts.org/wp-content/uploads/2016/09/2021-Final-SER-Template-endorsed.docx> and <http://www.eq-arts.org/wp-content/uploads/2023/02/EQ-Arts-Review-Report-template.docx> (standards and criteria; Access: 15.07.2023).

To enhance its position and relevance in the HEA sector, EQ-Arts has established CAs with various key stakeholder groups, such as design education and research associations, film and television schools, fine art networks, and conservatoires. The institution also conducts intensive trainings of experts in the field who work as reviewers in their review activities and may serve as panel members for other QA agencies in the arts field as well.

According to the SER and information available on EQ-Arts' website²², the preparation process for EQA reviews involves extensive discussions and an on-site preparatory visit to establish a clear understanding and open communication with the institution undergoing the review. On this occasion, EQ-Arts encourages an inclusive self-reflection process involving internal and external stakeholders to maximize the enhancement impact on the institution.

During the EQA process, EQ-Arts considers the institution's defined goals and processes in the context of both its national higher education context and relevant European standards and best practices for quality assurance in HAE. In EQ-Arts' description of the process, the resulting written reports are analytical and evidence-based, offering commendations for achievements and recommendations (or conditions in the case of assessment procedures) for further development without imposing external demands alien to the institution's culture.

After the review, EQ-Arts conducts follow-up surveys to assess the implementation and impact of the recommendations and conditions made. Critical feedback from institutions' experiences with the EQA process is captured through two questionnaires, one completed by experts participating in reviews and the other by institutions undergoing reviews or consultations. EQ-Arts points out that this feedback is used in continuous evaluation processes to improve the EQA provision and review process. Templates with more detailed information on the procedure and the institution's self-evaluation report, as well as a schedule for the site visit and a template for the follow-up procedure are available on the agency's website.²³

Analysis

The review panel concludes that EQ-Arts has demonstrated a strong commitment to meeting the requirements of the standard. The agency has designed its EQA processes with a clear focus on achieving its primary goal: prioritising the student learning experience from application to post-graduation professional development. It is evident that the agency's approach is guided by the principles of inclusivity and adaptability, aligning with both European standards and relevant national frameworks where appropriate.

The panel also recognises that EQ-Arts has effectively engaged stakeholders in the design and continuous improvement of its EQA procedures. The Board of Directors, made up of multi-disciplinary academic and professional experts nominated by a range of institutions, plays an important role in overseeing the agency's activities. CAs with key stakeholders such as design education and research associations, film and television schools, and visual arts networks ensure the inclusion of diverse perspectives from the CPAD sector. In addition, the agency's practice of training experts from the field as review team members further strengthens stakeholder involvement in the review process.

²² See <http://www.eq-arts.org/wp-content/uploads/2016/09/EQ-Arts-Indicative-Schedule-Preliminary.pdf> (Access: 15.07.2023)

²³ See <http://www.eq-arts.org/downloads/> (Access: 15.07.2023)

Further, the review panel asserts that EQ-Arts has made commendable efforts to align its processes with relevant European standards and best practice for quality assurance in higher education. The resulting written reports are analytical, evidence-based and sensitive to the institution's national higher education context, respecting its culture while offering commendations and constructive recommendations for further development. This demonstrates EQ-Arts' commitment to meeting the standard's requirements concerning appropriateness and compliance with relevant regulations. In this context, it is particularly worth noting that EQ-Arts is at the forefront of the CPAD sector in terms of subject specific and learning outcomes based reference frameworks for EQA procedures. The website reflects the important results achieved so far under the auspices of the Tuning Academy, with significant contributions from EQ-Arts (mostly from within the ELIA network, as the documents date from before 2015).²⁴

Although the panel members learned that these subject-specific qualification frameworks for various arts subjects such as dance, theatre, design, film, etc. are partly outdated and do not play a formal role in the EQ-Arts procedures, they constitute nevertheless important evidence of EQ-Arts expertise in the development and use of subject- and level-specific qualification frameworks. These frameworks are essential for a common understanding of the intended qualification profiles at different HEI levels, which also explains the agency's crucial role in related European projects, such as the recent CALOHEX European Erasmus+ programme "Measuring and Comparing Achievements of Learning Outcomes in Higher Education in Europe". Within this project, EQ-Arts has clarified that it is in fact co-leading the review of the arts learning outcomes for all three cycles of Higher Education study to ensure their currency and fitness for purpose. The panel understands that the role of EQ-Arts in this endeavour can hardly be underestimated, as the agency is undertaking reviews at all three levels (EQF 6-8) and in this respect could reasonably be expected to be the main promoter of cross-national qualifications frameworks in the HAE sector. EQ-Arts' membership and active involvement in EASPA (European Alliance for Subject-Specific and Profession Accreditation and Quality Assurance) is another important networking activity in this respect.

EQ-Arts has established a robust system for continuous improvement and evaluation of its EQA provision, although the panel observed that there is some room for improvement regarding the documentation and transparency of its IQA mechanisms and instruments (see ESG 3.6). The agency conducts follow-up surveys after reviews to assess the implementation and impact of the recommendations and conditions made. Critical feedback from both expert reviewers and reviewed institutions is collected, and this feedback is used to improve the EQA provision and review process – as confirmed by both reviewers and client institutions. However, as already indicated, this should be further evidenced by the exemplary provision of survey results, interpretations and follow-up actions to the panel (see ESG 3.6). The availability of templates on the agency's website ensures transparency and accessibility, further contributing to continuous improvement.

The review process used by EQ-Arts reflects a comprehensive and inclusive approach. The agency conducts preparatory site visits to facilitate open communication and a clear understanding of the institution under review. It encourages an inclusive process of self-reflection, involving both internal and external stakeholders, to maximise the impact of the improvement process on the institution. In this context, EQ-Arts has also established its own protocols and practice, based on procedural arrangements, for those processes it undertakes in collaboration with or on behalf of other agencies. The review panel acknowledges the agency's policy of agreeing CAs with partner agencies in such cases, which would, inter alia, provide clarity on respective responsibilities, cost sharing, requirements

²⁴ See *ibid.*

for expert panel members, the process for selecting panel members, standards applied and decision-making procedures.²⁵ The review panel also recognises that, in the case of non-EQAR registered agencies, the CA must ensure that the agency's process is "consistent with the ESG and in accordance with its own internal quality assurance standards".²⁶ As EQ-Arts has not yet presented a CA with a partner agency, the panel asks it to submit one for both types of procedures (accreditation/enhancement). Similarly, the panel would like to see how EQ-Arts would ensure the ESG compliance of the process and its outcomes in a CA with a non-EQAR registered agency.

In conclusion, EQ-Arts' commitment to the student learning experience, stakeholder involvement, inclusivity and adaptability demonstrates its efforts to meet the aims and objectives set for its EQA procedures whilst complying with relevant regulations. EQ-Arts' approach to continuous improvement through feedback and evaluation demonstrates its commitment to maintaining a high standard of quality assurance.

Panel final assessment after statement and additional information by EQ-Arts

1. The panel is grateful for comments and additional information provided with regard to the ESG 2.2.
2. Sample feedback results made available by EQ-Arts are recognized and have been specifically addressed in the panels' final assessment concerning ESG 3.6.
3. The Panel takes note of three CAs, which EQ-Arts provided for further inspection (the CAs were concluded between 2016 and 2020). The inspection reveals that the CAs are very carefully drafted agreements that address all relevant aspects of cooperation, including the object (enhancement or accreditation), the criteria to be applied, mutual obligations within the procedure, cost-sharing, and decision-making competence. The panel generally commends these agreements as visible proof of the cooperating agencies' commitment to shared quality assurance standards. The evidence provided thus far effectively alleviates the panel's reservations regarding its judgement of compliance with the standard.
4. Regrettably, EQ-Arts does not provide any further information on how it will guarantee compliance with the ESG in joint procedures if the partner agency is not an EQAR-registered agency. Given that such a situation has not arisen to date, it can be inferred from the existing CAs that agreeing on the applicable standards will be the explicit way to ensure compliance with the ESG. Considering EQ-Arts' general commitment to align its procedures with the ESG (matching of standards and ESG), and notably, the detailed CAs concluded for joint procedures in the past, the panel deduces that EQ-Arts will only enter into partnerships with non EQAR-registered agencies if compliance with the ESG is either assured or can be contractually ensured.

Panel recommendations

None

²⁵ According to the information on the website: <http://www.eq-arts.org/core-processes/collaborating-eqar-registered-international-national-gae-entities/> (Access: 15.07.2023)

²⁶ See <http://www.eq-arts.org/core-processes/collaborating-eqar-registered-international-national-gae-entities/> (Access: 15.07.2023)

Panel conclusion: *compliant*

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

2018 review recommendations

None

Evidence

15 EQ-Arts' SER indicates that it is actively engaged in EQA procedures, which aim to be reliable, useful, pre-defined, implemented consistently, and published. These procedures encompass several key components:

- 20 a) *Self-assessment or equivalent*: EQ-Arts employs a self-assessment process, represented by the institution's Institutional and/or Programme Self-Assessment Report, which is checked by EQ-Arts and revised, if needed, to ensure clarity and effectiveness. The SER serves as a basis for the subsequent external assessment.
- 25 b) *External assessment with site visit*: EQ-Arts follows a peer review approach, appointing a team of professional experts, who are experienced peers, to conduct the external assessment. The review team engages in a site visit to the institution, where they interact with various stakeholders, including internal and external representatives.
- 30 c) *Report resulting from the external assessment*: The external assessment leads to the preparation of a comprehensive assessment/review report, which is collaboratively produced by the review team Secretary and Chair, with input from other team members. The report highlights areas of good practice and provides recommendations/conditions for action and improvement, based on the levels of compliance against the relevant standards and criteria.
- 35 d) *Consistent follow-up*: EQ-Arts acknowledges the importance of a consistent follow-up process after the assessment review. The review team Chair carries out a further site visit or online process to ensure that the recommended actions and conditions have been addressed. This follow-up allows for continued dialogue about enhancement and improvement with the institution's senior management and academics.

The entire EQA process and its core elements are regulated by the Governance Framework (see specifically paras. 14ff.) and represented with more detailed information and templates in use for different steps of the procedures (SER, schedules, Review-Report, Follow-up) on the website of EQ-Arts.²⁷

²⁷ See <http://www.eq-arts.org/core-processes/> (Access: 15.07.2023)

It is worth noting that EQ-Arts' EQA framework requires the inclusion of a student member in the review team and that all members of the review team, including the student member, are sufficiently trained to conduct the review process effectively and consistently [para. 12 GF].

5 It is clear that the external review process requires the EQ-Arts review teams to do extensive preparatory work, analysing documentation provided by the institution and preparing questions to ensure a comprehensive coverage of the relevant standards and criteria during the site visit.

10 Concerning the site visit, it can be seen that EQ-Arts emphasises an inclusive and open forum approach to meetings with different groups within the institution, including internal and external stakeholders. This approach is intended to ensure that different viewpoints can be expressed freely and confidentially, contributing to a transparent and thorough review process.

At the conclusion of the site visit, the review team is expected to give oral feedback, presenting provisional findings to the institution's senior management/academics. This step allows the institution to be aware of the review team's initial conclusions and gives them the opportunity to seek clarification on any matters arising.

15 EQ-Arts employs a standardised review report template for both assessment and enhancement review reports, with a balanced presentation of commendations, recommendations, and conditions (if applicable). This approach aims to provide insightful feedback and a clear roadmap for the institution's enhancement and improvement efforts.

20 The review report is subject to an internal approval process within EQ-Arts before it is sent to the institution for factual corrections (see further under ESG 2.6). Although EQ-Arts has an appeals and complaints procedure (paras. 18 and 19 GF, respectively; see also under ESG 2.7), neither of these processes has yet been invoked against the agency by any institution.

Analysis

25 EQ-Arts has established and implemented a carefully designed framework for its EQA procedures (enhancement and accreditation/revalidation) that encompasses a self-evaluation report of the institution under review as the basis for the entire procedure, a (two-part) site visit, a review report, and a regular or, in the case of enhancement procedures, voluntary follow-up process. The review panel positively notes the comprehensive services of the Executive Office in preparing and conducting
30 the procedure and in supporting the institutions in the preparatory stages, particularly concerning the drafting of the SER and the preparation of the site visit. The two-part site visit approach of EQ-Arts, which institutions have described as challenging and quite densely packed, facilitates an in-depth scrutiny of the institution/programme for clarification of issues raised or left out by the SER. The panel highly values that EQ-Arts has also developed a scheme for virtual site visits (necessitated under the
35 circumstances of the COVID-19 Pandemic). Regarding this, the panel members note the agency has carefully drafted and released on the website guidelines for the conduct of virtual site visits, employing adequate methods to validate the information gathered.

40 In particular, the review panel discusses with EQ-Arts representatives the requirement for two site visits in the agency's EQA procedures (preliminary and main visit). The available templates for each of these visits (Annexes 16 and 17 to the SER) do not show any difference in the length and breadth of the visits. In fact, the panel learned that the model schedules for the preliminary as well as the main visit are the same for both institutions and review teams, regardless of whether the review is undertaken at programme or at institutional level.

In addition, a preparatory visit takes place between the CEO of EQ-Arts, staff of the Executive Office and representatives from the commissioning institution to discuss and agree the contract, which is the basis for the EQA review process. The preparatory visit thus serves a comprehensive and accurate information of the client institution. The panel considers this visit a highly beneficial service and valuable source of information for commissioning institutions. However, almost no information about this important preparatory step can be found on the website. Therefore, the panel encourages EQ-Arts to include this information.

As regards the two-site-visits approach, the preliminary visit addresses the IQA of the institution, whereas the main visit is aimed to assessing the implementation of the IQA through the institution's programmes as identified during the preparatory visit. Although being created in equal measure for enhancement and assessment/accreditation procedures, EQ-Arts declares the two site visit process applicable only at the specific request of the commissioning institution (see also para. 16.3 GF, Diagram A, explanatory note).

The panel notes that EQ-Arts' publicly available information in this respect does not yet meet the expectations. Despite an uploaded flow chart showing what the two types of EQA procedures have in common and where they diverge²⁸, the full information provided on the website particularly concerning the site visit remains confusing. In particular, if the two-site-visit process and templates are presented without further specification in the download section of EQ-Arts' website, it is not evident that in fact it is only to be used on explicit request of the applicant institution. Additionally, the differentiation between preliminary and main visits is, to some extent, misleading, if it describes an exceptional arrangement rather than the norm. The panel considers this a matter of transparency and communication, with no tangible impact on the actual procedures of EQ-Arts. Comments from the reviewed institutions support this finding. Unclear, inconsistent or misleading information on the website does nevertheless blur this deviation of procedures and hence cause confusion.

A comprehensive and detailed understanding of the purposes, procedural steps, applied standards, involved persons and roles, follow-up processes, etc. is a major condition for the effective conduct of EQA procedures. Adequate information policies about the procedures is therefore a major prerequisite for their professional and successful conduct and for a trusting relationship with the commissioning institution. Moreover, a proactive communication will engender greater engagement and involvement from stakeholders in the quality assurance processes. The EQ-Arts website is arguably an important tool in this regard. However, when visiting the website and reviewing the information provided there, the panel found (and continues to find) a number of inconsistent and/or outdated documents. According to the staff, this issue is already targeted as an ongoing IQA measure. Although some comments of student reviewers and students participating on the part of reviewed institutions suggested that the information flow on EQ-Arts procedures could be improved, the panel considers EQ-Arts' training and briefing routine for students as well as the information provided by the agency appropriate to comprehensively prepare students for upcoming procedures. Furthermore, the panel members are confident that EQ-Arts will take appropriate strides if shortcomings in this regard become visible.

The review panel finds overall commendable practices in relation to the reporting and follow-up processes in place. It therefore commends EQ-Arts' adherence to a highly structured reporting process

²⁸ The upload dates from July 2023; see <http://www.eq-arts.org/wp-content/uploads/2023/07/EQ-Arts-Flowchart-2023.png> (Access: 15.07.2023); also integrated in the revised Governance Framework (para. 16.3 GF, Diagram A, see <http://www.eq-arts.org/wp-content/uploads/2023/10/GOVERNANCE-FRAMEWORK-16.10.23.pdf> (Access: 19.10.2023)

and a robust and effective follow-up of the progress of the reviewed institution. Otherwise, the panel encounters similar difficulties to those related to the site visit with respect to the information disseminated online about the processes. While the panel members are able to take a close look at the published reports and follow-up reports, all of which contain sections with more detailed information about the process and its stakeholders, the information on the follow-up process in particular is spread across different sections of the website and different sub-sites. This relates, for example, to differences in the nature of the procedure (in the case of enhancement procedures, the follow-up process is voluntary), deadlines for compliance with conditions/recommendations and the composition of the follow-up team (chairperson and two members of the original review panel).

With regard to the timeframe, for the fulfilment of the requirements and the start of the follow-up process (which obviously refers only to the accreditation procedures), the review panel notes that the sole indication of a maximum of 15 months after the last/main review is unsatisfactory. This implies, without specification, that different (possibly shorter) time limits are set for certain conditions/recommendations according to their severity and at the discretion of the Board/agency. As long as EQ-Arts does not specify the possible diverging deadlines, the precise meaning of the set timeline remains unclear, which could be detrimental to the consistency and accountability of the procedures. Again, based on feedback from the surveyed institutions, the panel considers the practical impact of this uncertainty to be low. The panel members nevertheless reiterate their strong conviction that EQ-Arts should provide comprehensive, accurate and distinctive information about its EQA procedures on the website. The relevant information about the common features and key differences between the enhancement / accreditation procedures should be clear and easy to find, not hidden in sub-sites and/or templates.

In summary, the review team finds that overall EQ-Arts has established and adheres to well-designed procedures and processes for the implementation of its EQA procedures, which generally meet the requirements of the standard. This applies to all stages and types of procedures (progression/accreditation; institutional/programme). The panel is confident that, in practice, EQ-Arts implements these processes soundly, in consultation with the commissioning institutions and/or cooperating agencies. Nevertheless, the panel sees room for improvement in terms of clear, transparent and nuanced information about the similarities and differences of EQ-Arts' EQA procedures.

Panel final assessment after statement and additional information by EQ-Arts

1. The panel is grateful to EQ-Arts for clarifying factual matters particularly concerning the site visit, which have been thoroughly (re-)considered in the above analysis.

2. However, the panel does not find its critical remark on inconsistent, misleading or incomplete information about central parts of the procedure, falsified, neither in the case of the site visit nor in the case of the other instances mentioned (reporting, deadlines of fulfilment).

3. In summary, the panel maintains their originally formulated recommendation concerning the currency, consistency and transparency of the information about the procedures on the website.

4. Irrespective of this, they panel considers the standard (substantially) fulfilled.

Panel recommendations

For reasons of transparency, consistency and reliability of information, EQ-Arts is strongly encouraged to review and update the information about its EQA procedures provided on its website. Common and distinct features of the different EQA procedures should be easily discernible on the EQ-Arts' website.

5

Panel suggestions for further improvement

In line with the above recommendation, it is suggested that EQ-Arts more transparently communicates its services in the preparatory phase of an EQA procedure. EQ-Arts is also advised to regularly review the information on its website for consistency and remove outdated documents during its ongoing revision.

10

Panel conclusion: *compliant*

(The panel decides on “compliance”, limiting its judgement to the requirements of the standard in a narrow sense while being fully aware of and emphasising the need to clarify differences in procedures (see judgement on ESG 3.1)).

15

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

20

2018 review recommendations

With regard to this [the fees charged for the training programme (except for students)], the review panel recommends EQ-Arts to evaluate on whether the fees are causing any barriers or not. If so, the review panel recommends creating some sustainable funding opportunity instead of charging a fee for the provision of trainings to potential review team members.

25

Evidence

EQ-Arts is committed to adhering to the framework provided by the European Standards and Guidelines (ESG) and ensures its practices align with all ESG requirements. EQ-Arts review teams are composed of trained experts from different CPAD sectors (academics, managers, professionals/practitioners) and regularly include at least one student member (paras. 14 and 15 GF). EQ-Arts states that this policy has been consistently followed since the institution's initial EQAR Register application in 2017. According to the overview provided to the review panel, EQ-Arts has conducted 16 assessment and enhancement reviews since then, and each review panel has included a student member. EQ-Arts reaffirms its related commitment in accordance with the requirements specified in the Governance Framework 2023.

30

35

The agency maintains a register of peer-review experts, which currently comprises 96 members. The process for identifying, selecting, and training these experts is specified in detail in the Governance Framework (para. 13.1-13.2 GF). EQ-Arts highlights the training it offers, which is also the regular way to become registered as an EQ-Arts peer review expert. Following para. 12.1 GF, this training course
5 “is designed to

- familiarise participants with the ESG 2015 for Quality Assurance in the EHEA;
- engage participants in processes of evidence analysis and in the development of strategic approaches to the evaluation of internal QA processes;
- involve participants in a close simulation of an external international peer-review QA process;
- 10 • adapt the communication and teamwork skills of participants to the specific context of international external QA review processes;
- involve participants in simulated processes of the formulation and framing of conditions, recommendations and commendations;
- familiarise participants with the procedures and processes adopted by EQ-Arts”.

15 During the COVID-19 pandemic, EQ-Arts has managed to develop an online version of the training course as well. According to the information provided, sessions for the peer-review experts were conducted online in 2021, with 11 participants, and in 2023, with eight participants. Nevertheless, EQ-Arts explicitly aims to offer both versions of the training dependent on the prevailing circumstances.

20 The Governance Framework of the agency requires each member of an EQ-Arts review team to successfully complete either the training or a procedure-related briefing (“for those who possess commensurate profession”; para. 13.2 GF). EQ-Arts also defines the requirements for its reviewers in terms of formal qualification, professional background, QA experience and (English) language proficiency. Additional skills in facilitation, organisation, communication and writing are added to the qualification profile of the chairperson of the review teams (para. 15.4 GF)

25 Apart from the above, there are rules for the size and composition of the review teams depending on the type of exercise being undertaken and its scale and/or complexity. According to para. 15.2 GF, the minimum number of members for any team is three reviewers (including a student representative) and one secretary. The provision of the latter is a result of the recent revision of the Governance Framework. By including a secretary as a note-taker on its review teams, EQ-Arts aims to focus the
30 chair and other team members on the review process.

In addition, the Government Framework comprises detailed impartiality / conflict of interest rules in order to ensure an independent, impartial, and unbiased assessment of the institution or programme under consideration (para 14 GF). At the time of acceptance onto the EQ-Arts register, potential peer reviewers are required to declare and keep up to date a list of instances where they may have major
35 or minor conflicts of interest by completing the EQ-Arts Conflict of Interest Form. The Governance Framework then continues to exemplarily clarify the differentiation between major and minor conflicts of interest stating that minor conflicts could be acceptable in concrete cases dependent on the CEO’s assessment and decision (para 14.5 – 14.8 GF). In addition, it stipulates that the reviewed institution will receive a list of the panel members in due time before the main audit visit in order to
40 confirm the no-conflict-of-interest judgement of EQ-Arts (para 14.12 GF).

In 2021, the EQ-Arts signed a CA with the European Students’ Union (hereafter ESU) to collaborate and engage QA-trained student panel members in the review process.

Analysis

The panel acknowledges EQ-Arts' robust and comprehensive system for the composition, training and briefing of review teams for its EQA procedures. The feedback received from representatives of the reviewed institutions and from members of previous EQ-Arts review teams confirms the panel's impression that the agency strictly adheres to its rules and makes considerable efforts to assemble highly qualified review teams. EQ-Arts selects its reviewers not only based on their technical qualifications but also based on their procedural knowledge, management skills and communication skills in relation to their role as a reviewer. The review panel also notes that EQ-Arts' review teams generally reflect a "balanced mix of gender, geographical spread, applicable arts discipline specific knowledge, general QA&E experience, academic experience in higher arts education and experience of the professional world" (para. 15.5 GF). The review panel considers this to be a commendable, albeit challenging, guideline for the EQ-Arts' review team composition process (not least given the normally small number of team members). In this context, the review team also notes positively that knowledge of the country's higher arts education system and applicable legislation is addressed on a needs basis (para. 15.5 GF).

The reports of the enhancement and accreditation procedures completed to date by EQ-Arts alone or in cooperation with other agencies are exemplary of EQ-Arts' intention to ensure the quality of its review teams through strict adherence to its own rules and procedures. The involvement of the EAC in proposing members for the review teams and of the (full) Board in approving the actual review teams is an appropriate means of ensuring that appointments are made in full compliance with the governance framework. This includes, but is not limited to, EQ-Arts' meticulous impartiality policy that applies to all reviewers (para. 14 GF). However, this assessment is subject to the critical remarks on the role of board members in EQ Arts review teams (ESG 3.1).

EQ-Arts' training of reviewers and the establishment of a corresponding register of trained experts is considered a major strength of the agency's QA activities. The review panel considers the purpose, content and practical elements of the training – including an in-depth introduction to the standards, criteria and procedural rules, reflection on the role of the reviewer, practical exercises and simulations, etc. – to be very valuable in preparing reviewers for their tasks and role in specific procedures. The EQ-Arts reviewers, including student reviewers, whom the review team was able to meet during the on-site visit, agreed with this and emphasised their excellent preparation by the EQ-Arts training. In this context, the review team welcomes the fact that EQ-Arts promotes its training offer to the CPAD community and effectively takes responsibility for providing the European arts community, as well as other agencies across the EHEA, with qualified peer experts. EQ-Arts website provides examples of agencies that have successfully approached the agency for experienced arts professionals. However, given the importance of EQ-Arts' training service to the HAE and QA landscape, the review panel advises the agency to make it more visible on its website, for example by facilitating access to the information currently presented on a remote sub-site.²⁹

The fact that all members of EQ-Arts review teams are required to attend an EQ-Arts training or, alternatively, a procedural briefing in order to be appointed to a review team is seen as positive. Members of the Executive Office and the Board pointed out that participation in the training and the subsequent process of qualified admission to the register is the rule, while in rare cases of experts with a professional QA background, the alternative briefing route could be considered sufficient. The review panel strongly believes that EQ-Arts, through its reviewer training scheme, is making a

²⁹ See <http://www.eq-arts.org/what-we-offer/consultancy-2/eq-arts-reviewers-training/join-us/> (Access: 15.07.2023)

significant contribution not only to the consistency and comparability of its EQA procedures and results, but also to the integration of EQA into the arts sector as such, and thus to the confidence of arts institutions in EQA.

5 Although reviewers are included in the EQ-Arts register of reviewers for a four-year term, which is subject to renewal, the panel considers that the reported review of the register every two years, accompanied by interviews with registered reviewers about their experience and possible upskilling, is appropriate to continually adjust and maintain a highly skilled reviewer pool. However, it appears that reviewer retraining is carried out on an as-needed basis rather than on a regular basis, for example at the time of term renewal. The panel therefore encourages EQ-Arts to provide refresher courses for all its reviewers. In this context, the panel also notes that the register of reviewers is an important source of information that could be conveyed in statistical figures such as the number of experts, their areas of expertise, their academic and professional backgrounds as well as their geographical distribution. The publication of this information – in accordance with EQ-Arts’ privacy policy – could further strengthen the agency’s quality assurance process in terms of transparency, credibility and effectiveness, thus reinforcing its strategic positioning within the QA landscape.

10 With regard to the cost of training to applicants, the review team notes that students are exempt from paying fees, which is considered reasonable, and that EQ-Arts also seeks to differentiate fees according to average income in countries and regions. In the eyes of the panel members, this is an appropriate response to a suggestion made by the panel at the previous review.

20 In conclusion, the review panel affirms that EQ-Arts has implemented a meticulous procedure for assembling and appointing review teams. The agency’s reviewer training scheme stands as a significant asset, greatly esteemed within the CPAD sector of the EHEA. Notwithstanding this, the process of establishing and appointing review teams may be compromised to some extent by the regular appointment of Board members to the teams (see ESG 3.1).

25

Panel final assessment after statement and additional information by EQ-Arts

30 1. The review panel wishes to reiterate its highly positive perception of the extraordinary efforts EQ-Arts undertakes in training its reviewers, including the student reviewers. The impact of this initiative and investment of resources and expertise on the quality and consistency of the agency’s EQA procedures cannot be overstated.

35 2. EQ-Arts has commented on the panel’s report, stating that “all reviewers are invited to attend a refresher training programme to update their knowledge and catch up with EQ-Arts, and key pedagogic developments to remain on the register” (EQ-Arts comments, p. 14). However, as mentioned earlier, there appears to be no direct link between the extension of a reviewer’s listing on the register and mandatory re-training. The Governance Framework does not explicitly state this, and merely inviting all reviewers to attend a refresher training does not imply a compulsory practice, despite the closing phrase “to remain on the register”.

40 The panel still believes that decisions regarding participation in refresher trainings are typically made based on the individual reviewers’ interest or when there is a demonstrable need for upskilling. The offer of regular refresher training courses, which apparently exists, might then be promoted more visibly.

3. The panel acknowledges EQ-Arts’ extensive efforts to promote its training services within its networks and on its website. However, panel members remain convinced that the information on the

website is not easily accessible and seems somewhat misplaced on a sub-website within the 'Enhancement' section, even though it covers all EQA procedures of the agency. Consequently, the panel reiterates its suggestion to prominently display information about its training offerings on the website.

5

Panel commendations

EQ-Arts is commended for the breadth of peer reviewers that it trains and works with; peer evaluation and assessment is clearly highly valued by the CPAD sector.

10

Panel recommendations

None

Panel suggestions for further improvement

EQ-Arts is advised to make the training and refresher course offers more visible on the website.

15 *EQ-Arts is encouraged to make statistical specifics of its expert pool (e.g. number of experts, areas of expertise, academic and professional back-grounds, geographical distribution) publicly available for reasons of transparency and confidence-building.*

Panel conclusion: *compliant*

20 (The panel judgement is based on the standard in a narrow sense, while taking full account of the potential negative impact of Board members' participation in EQ-Arts review teams. This issue has been given consideration under ESG 3.3).

ESG 2.5 CRITERIA FOR OUTCOMES

25 Standard:

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

30

2021 review recommendations

None

Evidence

EQ-Arts has conducted altogether nine EQA activities in the period from 2019 to 2023. These activities comprise three “assessment reviews” and six “enhancement reviews”, all of which have been completed. The resulting EQA reports fall into two categories: “assessment review reports” and “enhancement review reports”.

To clarify the distinction, EQ-Arts points out that in case of assessment review reports, judgements are provided in the form of commendations, recommendations, and conditions, as appropriate to the EQA system being applied. These judgements are intended for the purpose of formal accreditation by EQ-Arts itself, where permitted by national legislation, or by another EQA agency listed on the EQAR Register.

Enhancement review reports, on the other hand, comprise – as the EQ-Arts’ Executive Office explains – best practice and recommendations leading to advisory judgements. In principle, these recommendations could be presented as conditions in a (hypothetical) assessment review to help institutions understand their significance, particularly if the same institution/programme were to be subject to a (subsequent) assessment procedure. This is on the assumption that improvement processes may be requested in preparation for formal assessment or for internal development purposes. However, EQ-Arts underlines that its enhancement reviews do not constitute formal recognition or accreditation of institutions or programmes.

The Governance Framework explicitly states that both assessment and enhancement processes are “essential precursors to the formation of robust and reliable quality judgments” (para. 8.1 GF). For both types of reports, EQ-Arts applies either its own Framework (procedural rules and quality standards and criteria) or a compulsory national framework, as prescribed by the national agency responsible for making formal accreditation or revalidation decisions (paras. 9.1 and 10.1 GF, respectively).

In 2021, the Board of EQ-Arts endorsed a set of revised standards and criteria as part of the agency’s revised Governance Framework, which are published on the EQ-Arts’ website. Previously, EQ-Arts had separate standards and prompts for reviews conducted at the institutional and programme levels. The revised standards shall apply uniformly to both types of reviews (enhancement and assessment/accreditation) as well as the different levels (institutional/programme). Consequently, EQ-Arts also updated and published the Review Report template aiming to enhance clarity for both internal and external stakeholders.

The reports, available on the EQ-Arts website (and the DEQAR database), provide evidence in the narrative section how judgements were formulated with respect to each standard. Accordingly, the EAPs review each draft report to ensure that the judgements are evidence-based and that the criteria are interpreted consistently. In cases where EQ-Arts collaborates with another QA agency, designated members of that agency’s decision-making body also review the draft reports with respect to the consistent use and interpretation of the applied standards and criteria. Although EQ-Arts’ standards and criteria are said to be consistently applied, it is noteworthy that only one formal assessment took place since the EQAR registration of EQ-Arts in 2021.

According to the Review Report template³⁰, there are three levels of judgement available to EQ-Arts review teams in making their judgement against each standard:

³⁰ See <http://www.eq-arts.org/wp-content/uploads/2023/02/EQ-Arts-Review-Report-template.docx> (Access: 15.07.2023)

- **Fully compliant** (institution meeting the standard in all respects);
- **Partially or substantially compliant** (institution meeting the standard in most, or some, respects);
- **Not compliant** (institution failing to meet the standard in all, or almost all, respects).

5 In the “Clarification of Matters” document provided after the site visit, EQ-Arts has conveyed additional information about of the Board’s overall decision-making practice in accreditaton procedures both with regard to each individual standard and to the holistic accreditation judgement. The main argument here is that the holistic assessment would not follow any “fixed algorithm”, but take into account particularly

- 10
- the number and nature of “partial compliant” assessments
 - the capacity/capability of the institution to remove the shortcomings addressed in the partially compliant sections of the report.

In addition, EQ-Arts uploaded a graphic illustration on the EQ-Arts process leading to a Board decision on accreditation after the site visit.³¹

15

Analysis

The expert panel notes that EQ-Arts applies its own (revised) set of standards and criteria to all EQA procedures within the scope of the ESG, regardless of the type of procedure (enhancement / addition (formal assessment)) or the level of review (institution / programme). The review panel acknowledges that the EQA standards and criteria are, in principle, publicly available on the agency’s website and are thus transparently communicated. However, as the panel has also critically remarked, the standards are hidden in supporting documents (SER and review report templates), which seems inappropriate given their relevance to the outcomes of the procedures (see the panel’s assessment of ESG 2.1).

25 It is also recognised that when EQ-Arts collaborates with other agencies, the relevant reference framework is regularly part of a mutual written agreement between the partner agencies (CA). This could lead to the application of combined standards of the agencies or, if necessary, to the application of binding national frameworks in the case of national assessment/accreditation procedures. Therefore, the relevant standards will be clarified in CAs with partner agencies, if necessary, and transparently communicated to the commissioning HAE institutions before the start of the procedure (preliminary site visit). EQ-Arts review reports also clearly reflect the standards on which the review is based. This process of defining and communicating the relevant standards and criteria of the EQ-Arts review procedures is considered appropriate by the review panel.

35 It is obvious that the similarities between the different types of procedures (enhancement vs. accreditation) end with the formal decision on compliance in the case of accreditation and revalidation (re-accreditation) procedures. Otherwise, the proximity of the procedures remains visible in principle, as EQ-Arts indicates the possibility to formulate the judgements on compliance in the same terms as in accreditation/revalidation procedures (“recommendations”, “conditions”). The review panel considers this reasonable and, in the long term, even helpful in familiarising both the EQ-Arts

³¹ See <http://www.eq-arts.org/wp-content/uploads/2023/07/Process-for-accreditation-judgements-2023.png> (Access: 15.07.2023).

reviewers and the institutions with the standards and thus in establishing a common understanding of them. On the other hand, EQ Arts should be aware that decision-making in an accreditation procedure might be influenced by the results of a preceding EQ Arts enhancement procedure for the same programme/s or institution (see panel analysis on ESG 3.1).

5 At the time of the onsite-visit, the panel found that the criteria used by EQ-Arts to decide on compliance with the standards were not clear and transparently communicated. EQ-Arts explains in the mentioned “Clarification of Matters” document – provided after the site-visit – that in the case of one or more “partially compliant” judgements by the review team, the appointed EAP (see under ESG 2.6) would have to make judgements considering the number and severity of deficiencies in relation to each standard and holistically across all standards. The panel positively notes that EQ-Arts has uploaded a graphic illustration on how the judgements on compliance with each standard are translated into an overall judgement on accreditation/revalidation after the site visit. The significance of this illustration could be considerably raised, however, if example cases of decisions based on the consideration of several “partially compliant” judgements were included. The review panel sees room for improvement in this respect and advises EQ-Arts accordingly.

10 The panel recognises that the range of possible outcomes (full, partial/substantial, non-compliance) is indicated in the Review Report template. Therefore, institutions could infer from the respective chapters 8 “Profile and compliance with the EQ-Arts standards” and 9 “Conclusions” the level of compliance they have achieved for each standard. The published reports also illustrate that the EQ Arts review teams, through careful validation of the status quo of institutions/programmes and rigorous triangulation of issues of uncertainty and concern, have demonstrated a consistent application of standards leading to comparable outcomes. Furthermore, the consistency of outcomes is ensured by involving the Board in the decision-making process who, as the guardian of the standards, monitors the fair and consistent application of the standards. EQ-Arts reviewers, Board members, and reviewed institutions participating in the discussions during the site visit simultaneously confirm their common understanding of this “checks and balances” approach and emphasise its importance for the fairness, reliability and accountability of the process. Before this background, the panel is confident that EQ-Arts’ decision-making process is appropriate to secure the consistent use and interpretation of its standards.

Panel final assessment after statement and additional information by EQ-Arts

1. As already mentioned, the panel commends EQ-Arts for presenting its “Standards and Criteria” (in the latest version) as a separate core document on its website.³²
2. It is further recognised, based on the provided samples, that the CAs with partner agencies clearly stipulate the standards to be applied for the reviewed programmes/institutions. These standards may include EQ Arts standards, partner agency standards, or an agreed-upon combination of both. The CAs also define the boundary conditions for decision-making, specifying the responsible decision-making body or bodies.
3. EQ-Arts explicitly states that it will not conduct an assessment review for any institution that has previously undergone an EQ-Arts Enhancement Review within the national period of cyclic reviews (as stated in EQ-Arts Comments, p. 3). Consequently, the panel finds a previously proposed suggestion to

³² See <http://www.eq-arts.org/wp-content/uploads/2023/09/EQ-Arts-Standards-09.23.docx> (Access: 19.10.2023)

EQ-Arts for clearer communication regarding the framework conditions of subsequent enhancement/accreditation procedures to be substantially unfounded and cancels it accordingly.

4. The panel acknowledges that EQ-Arts has significantly increased the transparency of its decision-making criteria and their application, notably through the inclusion of a graphic illustration of the decision-making process within the Governance Framework (para. 16.3 GF, Diagram A).³³ However, the panel reiterates its suggestion to further clarify these principles by providing concrete examples.

Panel recommendations

None.

Panel suggestions for improvement

It is suggested that EQ-Arts exemplifies the process of reaching (individual or holistic) judgements, in particular with regard to the translation of individual assessments of compliance with the ESG into a holistic assessment on accreditation (e.g. by presenting concrete cases of judgements and their underlying rationale).

Panel conclusion: *compliant*

ESG 2.6 REPORTING

Standard:

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

2018 review recommendations

None

Evidence

EQ-Arts review reports since 2017 are published on the agency's website. In the case of the assessment procedures, the publication of the reports include the formal decisions taken by the Board (see ESG 2.6).³⁴

³³ See <http://www.eq-arts.org/wp-content/uploads/2023/10/GOVERNANCE-FRAMEWORK-16.10.23.pdf> (Access: 19.10.2023)

³⁴ Repeatedly cited in this report, see: <http://www.eq-arts.org/completed-reviews/> (Access: 15.07.2023)

Until 2018, the reports were written by the review team under the coordination of the team's chair. However, since 2019, the institution introduced a change by including a secretary in the review teams. This secretary's role is to take notes during site-visit meetings and prepare the initial draft of the reports, aligning them with agreed standards. As the inclusion of the secretary was perceived positively, the EQ-Arts' Board has taken the decision that review teams should generally incorporate a secretary, enabling the chair and other team members to focus on the review process. The revised Governance Framework stipulates accordingly (para. 15.2 and 15.3).

According to the published information about the procedure, EQ-Arts' review process follows a timeline of 8-11 weeks, under normal circumstances, for the completion of the final draft reports after the main/final site visit. The reports adhere to a structured format, commencing with an introduction that provides institutional context, vision, mission, review team composition, and visit schedule details. Each of the now seven (formerly eight) standards is then addressed with a comprehensive description of the provision for each criterion, closely aligned with the SER template, followed by an analysis and evaluation/assessment of the findings. The review team is requested to substantiate commendations, conditions, and recommendations with referenced evidence. The level of compliance for the institution and/or each reviewed programme is holistically provided at the end of each standard (see ESG 2.5).

The decision-making process is prescribed in the Governance Framework (para 16.3 GF):

- Before submission to the HAE institution, the draft report is presented to the EQ-Arts' CEO and EAC, allowing them to analyze and comment on the findings. The committee may request additional evidence or suggest revisions to align the report with the written analysis if deemed necessary.
- The draft report is then sent to the HAE institution for correcting any factual or statistical inaccuracies. However, the institution does not have the authority to request changes to the review team's findings. Nevertheless, it retains the right to appeal or make a complaint according to the agency's Appeals & Complaints procedures (see paras. 18 and 19 GF and below ESG 2.7). The results of a review process can only be changed by appealing, not by lodging a complaint (paras. 18.2 and 19.1 GF).
- If factual errors noted by the institution are accepted by the Board, the report will be amended accordingly, with the approval of the review team and secretary, before final endorsement.
- Once the HAE institution accepts the final report, it is published on both the EQ-Arts' and DEQAR websites³⁵, ensuring accessibility to all relevant stakeholders, including higher education institutions, students, employers, professional organizations, QA agencies, and the general public. The reports are published in English to facilitate wider access.

In the "Clarification of Matters" document, provided *after the site visit* of the review panel, EQ-Arts indicates a clarification of the reporting and decision-making process (para 16.3 GF). According to these changes, which reportedly reflect what is already practiced and are approved by the Board, the process is as follows:

- Before submission to the HAE institution, the draft report, co-written with the review secretary and agreed with the review team, is sent to the Executive Office. The Executive Office requests the chair of the EAC to appoint two Board members forming an Enhancement and Accreditation Panel (EAP) tasked to critically read the draft report. The responsibility of

³⁵ See: <http://www.eq-arts.org/completed-reviews/> (Access: 15.07.2023)

the EAP is to ensure that the judgements on levels of compliance reached by the review team are consistent with the evidence presented in respect of each EQ-Arts standard.

- The EAP then prepares and submits a report of its findings to the Board specifying any necessary revisions to the report prior to its submission to the institution for fact checking. In the case of accreditation reports, the EAP also recommends to the Board with regard to the overall decision on the accreditation and on the timeframe in which the institution must satisfactorily meet any specified conditions.
- Once the report has been revised in accordance with any guidance set out by the EAP, it is sent by the Executive Office to the institution for a check on its factual accuracy. Once any matters of factual accuracy identified in the report have been addressed by the review team, a final draft of the report is submitted by the EAC to the Board for endorsement, and (in the case of accreditation reports) confirmation of the accreditation decision.
- As soon as the EQ-Arts Board has endorsed the final draft of the report, the commissioning institution will receive the final report from the Executive Office, and in the case of an accreditation report, a final decision. It is at this point, that the commissioning institution may choose to invoke the EQ-Arts Appeals Procedure (see ESG 2.7).

The “Clarification of Matters” document presents a graphic illustration of the process, including the divergent pathways for enhancement and accreditation reports, which will also be included in the amended section of the Governance Framework (see Annex 4 of this report).

Analysis

In general, the EQA reports of EQ-Arts are considered highly informative, providing a careful analysis and judgement of the review team (including the involved EAP and Board) on the compliance of the institution/programme with the underlying standards. It is also noted that the reports are publicly available on the agency’s website³⁶, in the case of accreditation procedures together with the relevant accreditation decision. Moreover, institutions commend EQ-Arts for its clear timetables, which are agreed at in the preparatory visit (or a preparatory online meeting) – while general information on procedural timetables is misunderstandable or incomplete (see ESG 2.3) – and for its constructive and helpful follow-up procedure.

The review panel recognises that EQ-Arts has developed a thoughtful reporting process, which from the outset has seen the preparation of reports as a collaborative effort between the review teams and the EAP/Board. The revision of the process, as set out in the “Clarification of Matters” document, is in fact consistent with EQ-Arts’ verbal explanations during the site visit, where members of the Board and the Executive Office told the Review Panel that the process that has been followed to date differs only slightly from what will be the future course of action.

The feedback from EQ-Arts reviewers and Board members involved in the reporting process as EAPs has been very positive underlining a shared perception of the benefits of the cooperation between review team and EAP/Board. Whilst the panel understands the argument for involving the EAP at an early stage in the decision making process in order to ensure consistency in the application and interpretation of the standards and the resulting judgements, there remains a concern that the process may adversely affect the independence and autonomy of the review team’s judgement. If the EAP, i.e. the Board, is involved in the reporting process from the outset, with the possibility of

³⁶ See <http://www.eq-arts.org/completed-reviews/> (Access: 15.07.2023)

modifying the findings even before the report is submitted to the institution, the question may arise as to whether the review team really has “authority over the final report”.³⁷ Notwithstanding the final consistency check by the EAP/Board, the EQ-Arts procedure is characterised by the fact that the institution does not receive a draft report from the review team with its preliminary assessment, but rather an already consolidated version with the EAP/Board. This creates a “double role” for the Board, and reduces the role of the panel. The review panel acknowledges that the process at this stage is formally designed to channel the EAP/Board’s monitoring findings back to the review team, which in this sense still owns the report.

However, the panel’s concern is reinforced when taking into account the crucial role of the chair of EQ-Arts’ review teams. As pointed out earlier, the already significant influence of the EAP/Board on the judgements and final decisions in the reporting process could be further strengthened when experienced and highly qualified Board members act as chairs of EQ-Arts review teams, even if they are effectively excluded from the decision-making in the related procedure.³⁸ As a result, this could interfere with the autonomous role of the remaining review team members in the assessment. The review panel therefore suggests reconsidering this practice of electing Board members as chairperson of EQ-Arts review teams (see above under ESG 3.3).

The review panel acknowledges the fact that EQ-Arts’ standards and criteria underwent a major revision in 2021. At that time, the agency decided to use the same reference framework for all its enhancement and assessment procedures, regardless of the level of assessment (i.e. institutional/programme). As part of the implementation of the revised framework, EQ-Arts also developed and published a single template for review reports. Looking at how the agency uses the template, the panel notes that EQ-Arts produced only one integrated report for the review of the *École Professionnelle des Arts Contemporains* (2022), which was a combined institutional and programme review. Although the panel does not object in principle to the idea of summarising the results of combined reviews in a single report, it considers that the analysis and judgements relating to the different thematic areas need to be clearly presented. The panel accepts EQ-Arts’ explanation that the integrated analysis and judgement was deliberately chosen in this case because of the limited number of programmes and the close interrelationship between the different levels of IQA under consideration. However, it would strongly recommend that the results of different accreditation procedures (i.e. programme/institution) that are combined for operational or pragmatic reasons should be clearly distinguished and reported.

Overall, EQ-Arts has established a commendable reporting process which provides institutions with meaningful analysis and judgements on the key features of their IQA systems. However, the practice of appointing experienced board members to chair the EQ-Arts review panels should be reconsidered. In addition, in the case of combined institutional and programme reviews the reports should present the respective findings in a differentiated manner.

³⁷ Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies, EQAR Register Committee (2020), RC/12.1, p. 12.

³⁸ The proposed changes to the respective section in the Governance Framework include a paragraph that effectively rules out such Board members’ physical presence and voting right during the Board meeting, in which the case is decided (see “Clarification of Matters”, p. 5 note 4).

Panel final assessment after statement and additional information by EQ-Arts

1. Concerning the involvement of the Board (and EAPs) and the chairpersons of the review panels in the reporting and decision-making process, reference is made to the comprehensive analysis and discussion under ESG 3.3.

2. With respect to panels' critical comments on the reporting of combined institution- and programme-related accreditation procedures, EQ-Arts claims (cf. EQ-Arts comments, p. 16) to have separately reported the outcomes (levels of compliance) in the one accreditation undertaken during the review period that for reasons of the size of the institution combined institutional and programme review (EPAC). The panel welcomes this statement of clarification. The panel members were aware that in the mentioned report, compliance judgements were provided separately for the institution and the (two) programmes. However, what the panel observed, as evident from the analysis, is that the analytical sections are presented in an integrated manner in the report, which hinders a thorough and comprehensive understanding of common and distinctive aspects of both the institution and the programmes. The panel maintains the opinion that, especially in combined procedures, the analytical components should be more clearly distinguishable in presentation and reporting, in addition to the results or outcomes. However, considering the exceptional circumstances mentioned by EQ-Arts as justification for combining procedures in the cited case, the panel has reevaluated its assessment, reformulated a proposed recommendation, and turned it into a suggestion for further improvement.

3. As a result, and given that involvement of board members is already included in the judgement on ESG 3.3 (partial compliance), for the other aspects EQ-Arts is considered (substantially) compliant with the standard.

Panel commendations

EQ-Arts is commended for its reports, which stakeholders found constructive. The same goes for the follow-up process, which was described as helpful and supportive.

Panel recommendations

None

Panel suggestions for further improvement

For the sake of clarity, it is suggested that the results (analysis and outcomes) of different accreditation procedures (i.e. programme/institutional), that are combined for operational or pragmatic reasons (e.g. size, availability of reviewers, location), are clearly distinguishable presented and reported.

Panel conclusion: *compliant*

(The panel decides on "compliance", highlighting concerns about the Board's role in EQ-Arts' decision-making process detailed under ESG 3.3.)

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

5

2018 review recommendations

[The panel recommends] to provide more explicit independence, that EQ-Arts consider alternative sources for at least one member of each of its Complaints and Appeals Committees.

10 Evidence

EQ-Arts has developed distinct Complaints and Appeals criteria and procedures (paras. 18 and 19 GF, respectively). These procedures are an integral part of the design of EQ-Arts' EQA processes.

According to the Governance Framework, the complaints procedure enables the institution to seek remedy for any deviation from, or failure in, the *procedural steps of EQ-Arts' service delivery* (see para. 15 18.2 GF). This process is supposed to ensure that corrective actions can be taken when necessary.

By contrast, the scope of the appeals process extends to the *outcomes of quality assessment* exercises, such as accreditation and revalidation. With the appeals process, the significance of the assessment for the HAE institution will be recognized and it will be ensured that genuine concerns over the reliability and robustness of quality judgements and their outcomes can be independently 20 tested (para 19.2 GF).

Moreover, the appeals procedure allows the institution to seek reconsideration of quality judgements or outcomes before the final report's publication. This will give the institution an opportunity to address any potential inaccuracies or discrepancies in the assessment outcomes.

In accordance with the Governance Framework, appeals could only be filed against accreditation / 25 revalidation procedures "where the judgements and their outcomes have a formal or legal standing that require the institution's compliance" (para. 19.2.1 GF). Moreover, the resort to an appeal is only possible in cases "where the quality assessment outcomes are either 'Accredited with conditions' or 'Not accredited'" (para. 19.2.2 GF). Similarly, appeals cannot be lodged against factual errors, which could be addressed in the procedure prior to the publication of the report, nor against "academic 30 judgments" in the strict sense as long as these were not rooted in flawed processes leading up to these judgements (para. 19.2.3 GF).

To maintain independence, all appeals, including complaints against the Board or its members (as the sole decision-making body), shall be heard by an Appeals Committee separate from the Board. The chair of this appeals committee is nominated for a three-year term by an independent professional 35 association whom EQ-Arts is formally associated in order to ensure impartiality (para. 19.5 GF). During the site visit, the review panel was informed that the Chair of the Appeals Committee had just been appointed (representative of NVAO).

The outcome of appeals (including complaints against the Board or its members) shall be reported to the Board by the Chair of the Appeals Committee. The Governance Framework clearly states the

assumption that “except in the most exceptional circumstances, the EQ-Arts Board will accept the verdict and recommendations of the Appeals Committee” (para. 19.5.2 GF).

To date, neither the complaints procedure nor the appeals procedure has been activated against EQ-Arts by any HEI.

5

Analysis

The review panel notes that EQ-Arts has developed and with its Governance Framework bindingly established distinct complaints and appeals procedures (paras. 18 and 19 GF). Overall, these procedures are well designed in the opinion of the panel, clearly differentiating objections of the institution against procedural flaws (“complaints”) from those against outcomes (“appeals”). Procedures, timelines, prerequisites, responsibilities, and involved bodies and persons are adequately laid out in the Governance Framework. It is noteworthy, yet considered reasonable, that “Complaints Committees” are to be set up case-wise, if the chair of the Board in cooperation with the institution and the chair of the review team cannot resolve the matter. Otherwise, the establishment of the standing “Appeals Committee” also makes good sense as it is tasked with substantial allegations against one or more judgements of EQ-Arts’ review teams. The review panel is satisfied with EQ-Arts’ assertion to provide members of both types of committees with an adequate briefing about their task and responsibilities.

Despite the careful design of the Complaints and Appeals Procedures, the review panel believes that certain provisions are either erroneous or inaccurate. For example, para. 18.4 GF, which deals with the exceptional case of complaints against the Board or its members, presumably should refer the case to the Appeals Committee (rather than to a Complaints Committee, which would be inappropriate and logically inconsistent). Similarly, para. 18.6 GF would have it that “in all cases the CEO of EQ-Arts will make a decision on the complaint”, which presumably should read “the chair of the EQ-Arts Board”. It is the chair of the Board who, in some cases, reserves the right to reject complaints, in other cases decides by agreement with the institution and the chair of the review team, and in all cases where a Complaints Committee is established, receives a report from the Committee for decision. EQ-Arts should review the wording in these cases and correct or adapt it as necessary.

The panel recognises that the revised Governance Framework of EQ-Arts ensures the appointment of an independent chair of the Appeals Committee, thus following the recommendation of the 2018 EQAR review team. At the same time, the panel considers EQ-Arts’ decision acceptable to recruit the ad-hoc Complaints Committees from within the agency (three members of the EQ-Arts Register of Peer Reviewers plus the CEO, see para 18.5 GF).

In addition, the review panel has the impression that the procedures, as well as their various purposes, instruments and processes, are not well known among the institutions – as suggested by the interviewed representatives of the reviewed institutions. Some kind of information seems to be provided, but the institutions do not seem to be very familiar with it. This is all the more surprising as the decision-making process of EQ-Arts explicitly excludes institutions from submitting dissenting opinions on the assessments of the review teams in the regular course of the procedure, where only factual accuracy is to be checked, thus de facto leaving substantial objections to the appeals procedure (see 16.3 GF, old and new versions). Furthermore, the panel could not ascertain whether the final documents of EQ-Arts in accreditation/revalidation procedures regularly contain information on remedies. Irrespective of this, the panel would like to see EQ-Arts effectively informing client

institutions about its complaints and appeals procedures, including the different purposes, requirements, procedures and timelines.

In conclusion, EQ-Arts has established complaints and appeals processes that are well fitting with its overall EQA framework. The processes adhere to the principles of independence, transparency and compliance with the governance framework, provide a mechanism for addressing complaints or appeals where deemed necessary, and ensure the accuracy and reliability of quality assessments.

Panel final assessment after statement and additional information by EQ-Arts

1. The review panel is pleased to see that some errors and inconsistencies in the Governance Framework, with respect to the complaints and appeals procedures mentioned above, have been removed in the revised version of the Governance Framework.

2. The panel takes note of EQ-Arts' assertion that clients are made aware of the complaints and appeals procedures by referencing them to the Governance Framework as the core procedural document. The panel also welcomes EQ-Arts' intention to update the contract for reviews by including an urgent recommendation for client institutions to read the EQ-Arts Governance Framework. Additionally, their proposal to incorporate two related flow diagrams into the Governance Framework for visualizing the Complaints and Appeals process and timelines is appreciated.

3. In the panel's view, these measures could significantly contribute to the client institutions' increased understanding of these procedures, especially considering that the appeals procedure is the only mechanism to substantially contest the results and outcomes leading to decisions in accreditation/revalidation procedures.

4. However, as the actions to increase the information about and visibility of the purpose, possible grounds, and timelines of the procedures have not yet been evidenced, the panel considers it reasonable to remind EQ-Arts of this issue in a related suggestion. The implementation of the planned measures could be easily demonstrated in the further review procedure.

5. Irrespective of this, the appraisal of the Complaints and Appeals procedures leads the panel to judge EQ-Arts as (substantially) compliant with the standard.

Panel recommendations

None

Panel suggestions for further improvement

It is suggested to EQ-Arts that it informs the HEIs it works with not just about the existence of its complaints and appeals procedures, but also about the diverging purposes, processes and timelines set out for them.

Panel conclusion: *compliant*

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG Part 3	Commendations
3.1 Activities, policy, and processes for quality assurance	<i>EQ-Arts is commended for the range of its Quality Assurance and Enhancement activities, in particular, the role it takes in supporting stakeholder organisations within the European Higher Arts sector and training experts to support the ‘players of tomorrow’.</i>
3.2 Official status	–
3.3 Independence	–
3.4 Thematic analysis	<i>EQ-Arts is commended for the quality and depth of its Thematic Analysis and the value this offers to the European Higher Arts sector and affiliated organisations. EQ-Arts is encouraged to continue this work on a regular basis and address the areas outlined in the review meetings, e.g. blended learning.</i>
3.5 Resources	<i>EQ-Arts is commended for its approach to a “Working Board”, and the breadth of expertise, knowledge and currency that these colleagues contribute to the agency’s work. The Board is a unique and valuable asset, particularly in this regard.</i>
3.6 Internal quality assurance and professional conduct	–
3.7 Cyclical external review of agencies	–
ESG Part 2	
2.1 Consideration of internal quality assurance	–
2.2 Designing methodologies fit for purpose	–
2.3 Implementing processes	–
2.4 Peer-review experts	<i>EQ-Arts is commended for the breadth of peer reviewers that it trains and works with; peer evaluation and assessment is clearly highly valued by the CPAD sector.</i>
2.5 Criteria for outcomes	–
2.6 Reporting	<i>EQ-Arts is commended for its reports, which stakeholders found constructive. The same goes for the follow-up process, which was described as helpful and supportive.</i>
2.7 Complaints and appeals	–

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG Part 3	Judgement	Recommendations
3.1 Activities, policy, and processes for quality assurance	pc	<i>It is recommended that the agency prioritises and increases its core EQA activities and clearly distinguishes between ESG covered activities (accreditation, enhancement review) and other activities (benchmark), which are 'tailor-made'.</i>
3.2 Official status	c	–
3.3 Independence	pc	<i>Given the role of the EQ-Arts Board in the reporting and decision-making process, EQ-Arts should formally exclude Board members from taking part in accreditation/assessment procedures. EQ-Arts should either concretise the status of "observers" within the Board or avoid using the term in this context (e.g. in the GF and on the website).</i>
3.4 Thematic analysis	c	–
3.5 Resources	pc	<i>Whilst recognising that the COVID-19 Pandemic has had an impact on all businesses, it is highly recommended that EQ-Arts consolidate and expand its funding base in such a manner that its operation is ensured reliably and sustainably in the future. This needs to be evidenced, in the first place, by establishing a credible and sustainable financial and business plan, which is subject to annual revision. Further, it is recommended that EQ-Arts increases and strengthens the key competences of business planning and financial management within the Board.</i>
3.6 Internal quality assurance and professional conduct	pc	<i>It is highly recommended that EQ-Arts ensures that all existing internal quality assurance processes and protocols for the full range of its EQA procedures are documented and communicated clearly, consistently and accurately. Additions to existing documents or a QA manual, including process descriptions, process charts etc., may be helpful in this respect.</i>
3.7 Cyclical external review of agencies	c	–
ESG Part 2		
2.1 Consideration of internal quality assurance	c	–
2.2 Designing methodologies fit for purpose	c	–
2.3 Implementing processes	c	<i>For reasons of transparency, consistency and reliability of information, EQ-Arts is strongly encouraged to review and update the information about its EQA procedures provided on</i>

		<i>its website. Common and distinct features of the different EQA procedures should be easily discernible on the EQ-Arts' website.</i>
2.4 Peer-review experts	c	–
2.5 Criteria for outcomes	c	–
2.6 Reporting	c	–
2.7 Complaints and appeals	c	–

Judgement/categories: c – compliant; pc – partially compliant; nc – non-compliant

This summary section omits the panels' suggestions for further improvement (see ESG 3.2, 3.3, 3.6; 2.3, 2.4, 2.5, 2.6, 2.7).

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

Schedule Agency Review EQ-Arts / June 2023

DAY 1: Monday, 26 June 2023

TIMING	MEETING / FOCUS GROUP	INTERVIEW PARTICIPANTS	COMMENTS
until 12.00 am 12.30 am – 14.30 pm	Arrival of Expert Team <i>Internal light lunch at meeting place</i> Introductory round and preparation of review meetings/discussions; list of questions (general matters of clarification, focus areas etc.)	ASIIN + Expert Team	
14.30 pm – 16.30 pm	Meeting with EQ-Arts Executive Office		
16.30 pm – 16.45 pm	<i>Break, internal discussion</i>	ASIIN + Expert Team	
16.45 pm – 18.15 pm	Meeting with EQ-Arts Board		<i>Online participation of student peer</i>
18.15 pm – 18.45 pm	Wrap-up of the day, internal	ASIIN + Expert Team	
18.45 pm / End of Day 1			

DAY 2: Tuesday, 27 June 2023

TIMING	FOCUS GROUP	INTERVIEW PARTICIPANTS	COMMENTS
08.30 am – 09.00 am	Arrival of Expert team	ASIIN + Expert Team	

09.00 am – 10.00 am	Meeting with EQ-Arts Reviewers		<i>online</i>
10.00 am – 10.15 am	<i>Break, internal discussion</i>	ASIIN + Expert Team	
10.15 am – 11.45 pm	Meeting with EQ-Arts Enhancement and Accreditation Committee (EAC)		
11.45 am – 12.00 am	<i>Break, internal discussion</i>	ASIIN + Expert Team	
12.00 pm – 13.00 pm	Meeting with Representatives of Governance Committee (GC) and Finance and Business Committee (FBC)		
13.00 pm – 14.00 pm	<i>Lunch Break, internal</i>	ASIIN + Expert Team	
14.00 pm – 15.00 pm	Meeting with heads/QA officers of EQ-Arts' accredited HEIs		<i>online</i>
15.00 pm – 15.15 pm	<i>Lunch Break, internal</i>	ASIIN + Expert Team	
15.15 pm – 16.30 pm	Meeting with Students of EQ-Arts' accredited HEIs		<i>online</i>
16.30 pm – 17.00 pm	Wrap-up of the day; pending issues; internal	ASIIN + Expert Team	
<i>17.00 pm / End of day 2</i>			

DAY 3: Wednesday, 28 June 2023

TIMING	FOCUS GROUP	INTERVIEW PARTICIPANTS	COMMENTS
08.30 am – 09.00 am	Arrival of Expert team	ASIIN + Expert Team	
09.00 am – 10.00 am	Meeting with representatives of employers / other external stakeholders		<i>online</i>

10.00 am – 10.15 am	<i>Break, internal discussion</i>	ASIIN + Expert Team	
10.15 am – 11.15 am	Meeting with CEO and General Manager to clarify remaining issues		
11.15 am – 12.45 pm	Internal Meeting of Expert team; wrap up results of review	ASIIN + Expert Team	
12.45 pm – 13.00 pm	Final debriefing meeting with EQ-Arts	ASIIN + Expert Team Arts Board and Executive Office	
13.00 pm / End of Day 3			
13.00 pm	<i>Optional: Joint Lunch with ASIIN expert team + EQ-Arts representatives</i>		

ANNEX 2: TIMESCALE OF THE REVIEW

Agreement on Terms of Reference	September/2022
Appointment of review panel members	January 2023
Self-assessment completed	April/2023
Preparation of site visit schedule and indicative timetable	April/2023
Briefing of review panel members	May/2023
Review panel site visit	26-28 June/2023
Draft review report to EQ-Arts	14 September 2023
Statement of EQ-Arts to review panel (if applicable)	7 October 2023
Submission of final report to EQ-Arts	3 November 2023
Submission of final report to EQAR	November 2023
EQAR Register Committee meeting and decision on the application by EQ-Arts	December 2023 / February 2024

ANNEX 3. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY EQ-ARTS

Annex 1 EQ-Arts GOVERNANCE FRAMEWORK 2023 (10) FINAL 14.04.23.pdf
 Annex 2 Operational Plan DRAFT to be endorsed by Board 5.6.23.pdf
 Annex 3 EQ-Arts DRAFT Strategic Plan 2022-26 16.03.23.pdf
 Annex 4 Updated EQ-Arts organigram.pdf
 Annex 5 EQ Arts annual accounts 2022.pdf
 Annex 6 Board Members December 2022.pdf
 Annex 7 Copy of Skills audit 13.5.2021.pdf
 Annex 8 Timeline of EQ-Arts activities from 2006.pdf
 Annex 9 Creator Doctus 'A framework of good practices for 3rd Cycle doctoral awards in the creative and performing arts and design sector'.pdf
 Annex 10 EQ-Arts Thematic Analysis 2017-2020.pdf
 Annex 11 Stamped original and translation of statutes.pdf
 Annex 11 Statutenwijziging Stichting EQ-Arts- Enhancing Quality in the Arts (NL).pdf
 Annex 12 EQ-Arts Customer Satisfaction Survey.pdf
 Annex 13 EQ-Arts Expert Satisfaction Survey.pdf
 Annex 14 EQ-Arts Register of Experts April 2023.xlsx
 Annex 15 EQ-Arts re Board member 05_26_20.pdf
 Annex 15 Invitation Cilect.pdf
 Annex 16 EQ-Arts-Indicative-Schedule-Preliminary.pdf
 Annex 17 EQ-Arts-Indicative-Schedule-Main-Visit.pdf
 Annex 18 2021-Final-SER-Template-endorsed.docx
 Annex 19 EQ-Arts-Review-Report-template.docx
 Annex 20 EQ-Arts-Template-Follow-up-Report-2020.docx
 EQ ARTS SER ACTUAL 2.0 FINAL.pdf

ADDITIONAL DOCUMENTS PROVIDED AFTER THE SITE VIST

“EQ-Arts Clarification of matters” paper

ADDITIONAL DOCUMENTS PROVIDED TOGETHER WITH EQ-ARTS COMMENTS ON THE REVIEW REPORT

Revised Governance Framework as of 16 October 2023

ESG 2.1 required documents – Standards

- 2023-Final-SER-Template
- EQ-Arts-Standards-09.23
- EQ-Arts-Standards-mapped-to-ESG-09.2023

ESG 2.2 required documents – CA

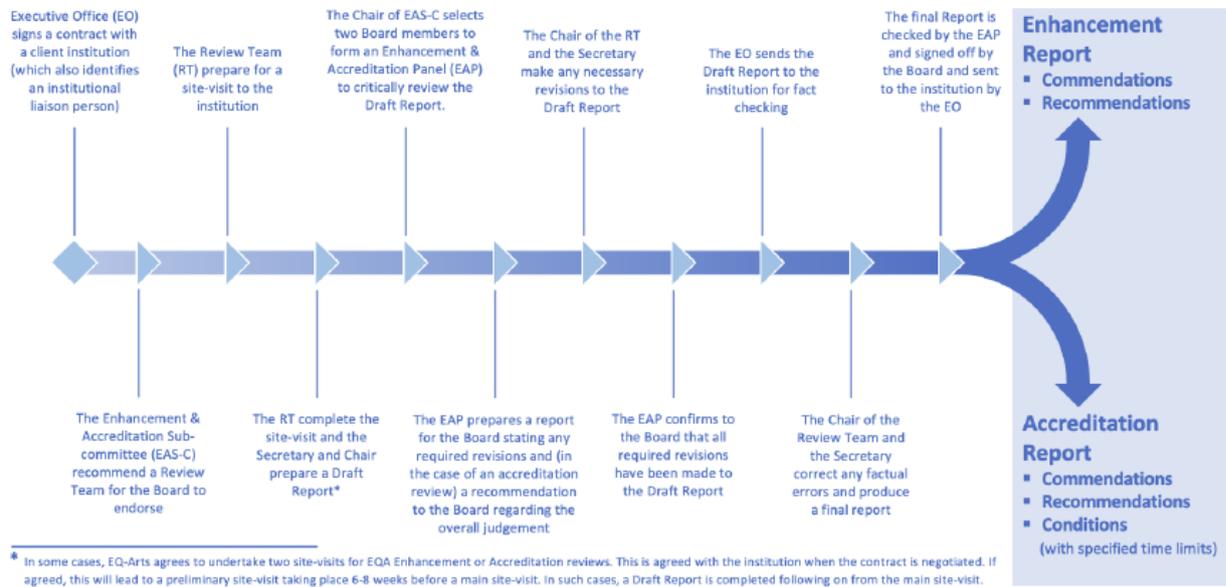
- 07.02.2017 Final Cooperation Agreement MusiQuE EQ-Arts_Astana (non national, accreditation)
- 10.11.2016 Agreement AQ Austria_EQ-Arts_Audit UFG (national, accreditation)
- 11.06.2020 Final Cooperation Agreement MusiQuE EQ-Arts_Antwerp (non national, enhancement)

ESG 3.6 required documents – Feedback

- Sample Customer Surveys
- Sample Experts Feedback
- Follow Up Reports

OTHER SOURCES USED BY THE REVIEW PANEL

Graphical illustration of the reporting process of EQ-Arts



Source: "Clarification of Matters" paper, additional information provided after the site visit

ANNEX 4: GLOSSARY

CA	Cooperation Agreement
CPAD	Creative Performing Arts & Design
Cilect	Centre International de Liaison des Ecoles de Cinéma et de Télévision
Cumulus	The Global Association of Art and Design Education and Research
EAC	Enhancement and Accreditation Sub-Committee
EAP	Enhancement and Accreditation Panel
EHEA	European Higher Education Area
ECA	European Consortium for Accreditation
ELIA	European League of Institutes of the Arts
EQA	External Quality Assurance
EQ-Arts	EQ-Arts – Enhancing Quality in the Arts
EQAR	European Quality Assurance Register
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
ESU	European Students' Union
FS	Foundation Statutes
GF	Governance Framework
HAE	Higher Arts Education
HE	Higher Education
HEI	Higher Education Institution
IQA	Internal Quality Assurance
NVAO	Nederlands-Vlaamse Accreditatieorganisatie
QA	Quality Assurance
SER	Self-Evaluation Report of EQ-Arts



EQ-Arts Agency Review coordinated by ASIIN / Clarification to requests of the Register Committee

General remarks

In analysing the details of the (2x7) standards of ESG, one might lose sight of the overall picture. We want to point out that we consider EQ-Arts a very small agency, run by a group of highly dedicated and committed people, whose dedication and experience is highly valued by the HAE sector. The panel appreciated this very much. Notwithstanding the critical notes in our report, the ‘paperwork’ of the agency in many aspects looked fine or was amended even during the site visit. As mentioned, we could not observe the application of the changes in practice.

On the other hand, the agency is small, if not too small when it comes to the volume of procedures they run, and to the financial and organisational resources they have, which means that continuity of EQ-Arts is always a problem.

Moreover, the size of the organisation, and the dedication of its people means that roles are not always separated in a proper manner. Although the panel is convinced of the best intentions and integrity of EQ-Arts staff and board members, this situation is considered not acceptable from the perspective of the ESG. When suggested to reconsider the role of board members in review procedures, EQ-Arts refused to do so, pointing to the valued experience of board members in such procedures.

As to the detailed questions of the Register Committee, the review panel points out the following clarifications:

ESG	Question	Clarification / Comment of Review Panel
2.2	<i>What kind of evidence did you come across regarding stakeholders’ involvement in consultation processes for drafting the agencies’ methodologies? Can you share some examples?</i>	_Especially the discussions with Board members during the site visit in Brussels demonstrated its functioning as “sounding board” reflecting

		<p>the feedback of a variety of stakeholders already present as members or so-called observers in the Board.</p> <p>Since all major decisions on the activities and applied methodologies of EQ-Arts are supposed to be taken by the Board, the inclusion of feedback of stakeholders is implied in the constitutive structure (in fact in the “Statutes”) of EQ-Arts.</p> <p>_EQ-Arts convincingly argued that through its participation in a range of EU projects in the HAE sector – which otherwise cause concerns of the review panel (see particularly assessment and judgment on ESG 3.1) – it benefitted from results achieved there for its EQA activities (e.g. concerning the Subject-specific criteria of special areas in the field).</p> <p>_Structured feedback from the reviewers, which are (mostly) nominated by stakeholder organisations can be taken as additional proof for EQ-Arts’ practice to include feedback from stakeholders in the drafting, revising and improving of its methodologies.</p>
2.4	<p><i>In panel’s view, the agency was found to be compliant with the standard. However, the Committee noted that the only external reviewers included in the review process are two individuals, while everything else is done by the members of the Board. Can you elaborate further on your judgement, with focus on whether the agency has real process of involvement of external reviewers?</i></p>	<p>_This is incorrect: P. 49 of the Review Report reads “EQ-Arts review teams are composed of trained experts from different CPAD sectors (academics, managers, professionals/practitioners) and regularly include at least one student member (paras. 14 and 15 GF).”</p> <p>According to the available information and as a rule, only the Chair of the EQ-Arts review team is normally an acting Board member at once. So, from a formal point of view, it is obvious that the majority of the</p>

		<p>review team is always represented by “external reviewers” (including the student peer). The participation of highly respected experts in EQ-Arts panels is indeed one of the strongpoints of EQ-Arts procedures, as confirmed by representatives of EQ-Arts reviewed programmes and institutions.</p> <p>Whether this perspective holds true in the sense of an independent judgment of the majority is questioned by the panel. The Chair’s responsibilities within the review team and the preponderance of the Board (and the Chair) in the decision-making and reporting processes is assessed critically by the panel (see particularly ESG 3.3).</p> <p>_This is exactly why the panel adds a caution to its compliant judgment of ESG 2.4.</p>
2.5	<p><i>In panel’s view, the agency was found to be compliant with the standard. However, the Committee noted that the agency has undertaken only one review on its own. Can you clarify how you concluded that there is consistency in the decision making following the low number of reviews performed by the agency following the new methodology?</i></p>	<p>_In fact, the low number of procedures is a major concern of the review panel. It is also correct, that since its first registration EQ-Arts carried out only one accreditation procedure in its own responsibility.</p> <p>However, in the procedures which EQ-Arts conducted under the formal responsibility of another EQAR-registered agencies, EQ-Arts has taken the decision for the degree programmes within its remit. In addition, the enhancement procedures undertaken by EQ-Arts are subject to the same standards and criteria and considered by EQ-Arts as comparably rigorous in applying the standards. This even to the point that – as EQ-Arts has clarified – “recommendations could be presented as conditions in a (hypothetical) assessment review to help institutions</p>

		<p>understand their significance, particularly if the same institution/programme were to be subject to a (subsequent) assessment procedure” (p. 54 Review Report).</p> <p>_The inspection of EQ-Arts’ assessment as well as enhancement reports, the intensive and thorough training of reviewers as well as the – in itself questionable – role of the Board in ensuring the consistency of the application of standards and criteria leave the panel convinced that consistency of decision can be attested.</p>
2.7	<p><i>In the report, the panel notes that sometimes the Chair of the Board decides on complaints. In other part of the report, the panel notices that the complaints are handled by an independent body. Can you clarify the procedure for complaints?</i></p>	<p>_This is a misunderstanding: EQ-Arts has duly defined and differentiated Complaints and an Appeals criteria and procedures. There were some minor inconsistencies in the respective provisions of the Governance Framework (sec. 18 and 19 GF respectively; see pp. 62ff. Review Report), which however, EQ-Arts has removed already (p. 64 Review Report, grey box).</p> <p>What can be said is this:</p> <ul style="list-style-type: none"> a) The Complaints procedure is strictly confined to procedural deviations, biases, failures etc. All complaints are finally decided by the Chair of the Board. b) By contrast, the Appeals procedure addresses the outcomes of quality assessment (genuine concerns over the reliability and robustness of quality judgements and their outcomes). For this, EQ-Arts has established an independent Appeals Committee.

		<p>c) The only complaints to be handled by the Appeals Committee are complaints against the Board or some of its members, for obvious reasons.</p>
3.1	<p><i>In panel's view, the agency was found to be partially compliant with the standard. However, the Committee is considering whether the ESG's requirement that the agency should perform EQA on a regular basis is fulfilled in this case. Can you explain your view on what/how frequent is "regular basis"?</i></p>	<p>Standard ESG 3.1 does not only mention the 'regular basis' but also refers to some other aspects. Taking into account the other elements of the standard, the panel concluded a partial compliance. The question what should be considered as a 'regular basis', should in our opinion rather be answered by EQAR in its interpretation of the ESG.</p> <p>However, even taken together, the Assessment <i>and</i> Enhancement procedures of EQ-Arts are on average such few cases – from the time of the establishment of the agency to its first EQAR registration and since then – that one can hardly speak of a 'regular' practise in any meaningful sense of the term.</p>