

Rejection of the Application by Independent Kazakhstan Center of Accreditation (IKCA) for Inclusion on the Register

Register Committee
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Application of:	2022-05-09		
Agency registered since:	n/a		
Type of review:	Full	Site visit:	2022-06-30
External review report of:	2023-04-19	Submitted:	2023-05-25
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Heli Mattisen, Marie Gould, Paolo Cherubini, Stanimir Boyadzhiev		
Decision of:	2023-12-12/2023-06-30		
Registration until:	n/a		
Absented themselves from decision-making:	n/a		
Attachments:	<ol style="list-style-type: none"> 1. External Review Report, 2023-04-19 (external file) 2. Minutes from a clarification call with panel, 2023-06-09 3. Additional representation by IKCA, 2023-10-01 		

1. The application of 2022-05-09 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-06-02.
3. The Register Committee considered the external review report of 2023-04-19 on the compliance of IKCA 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 2023-06-09.
5. The Register Committee invited IKCA to make additional representation on the grounds for possible rejection on 2023-07-30. The Register Committee considered ECAQA's additional representation on 2023-10-01.

Analysis:

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

- *institutional accreditation of higher education organizations* (incl. post-accreditation monitoring) and
- *specialized (programmatic) accreditation of educational programs* (incl. post-accreditation monitoring).

7. The activities *institutional and program accreditation of technical and vocational education* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

8. The tripartite terms of reference (i.e. the TOR) between IKCA, the coordinator and EQAR also included the activity *accreditation of organizations of additional (further) education (incl. post-accreditation monitoring)* in the list of ESG aligned activities, i.e. the standards and guidelines of this activity and its implementation were expected to be evaluated by the panel. From the report, the Committee has learned that this activity is aimed at institutions that do not provide degrees at QF – EHEA level 6, 7 or 8 (i.e. are not considered to be part of the higher education sector in Kazakhstan).

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

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

ESG 2.1 – Consideration of internal quality assurance

11. From the report, the Committee learned that agency's standards for accreditation took in consideration, to large extent Part 1 of the ESGs. From the analysis of reports though, the panel detected that, in practice, standards of the ESG Part 1 were either partially or not covered at all. In particular, comprehensive analysis of higher education institutions' compliance with ESG 1.1, ESG 1.4, ESG 1.6, ESG 1.7 and ESG 1.9 was lacking in (most of) the reports.

12. The Committee found that the agency, even though formally addressed the ESG Part 1 in its standards, lacked the practical implementation in its reviews. The Committee concurred with panel's conclusion and found the agency to be partially compliant with the standard.

13. In the additional representation, IKCA noted that its Standards for Institutional and Specialized (Programme) Accreditation have been updated aiming to provide better coverage of the ESG Part 1 in the external reviews. In addition, a training for experts has been organised in order to familiarise the reviewers with the agency's methodology.

14. The Register Committee welcomed IKCA's efforts to improve its work in addressing ESG Part 1. The Committee however, highlighted that the initial

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conclusion of partial compliance was mainly due to the implementation of the agency's methodology in practice rather than the instruments in place. The Register Committee noted that a further panel insight would be needed to demonstrate whether all standards of Part 1 are included in IKCA's reports following the agency's efforts to improve its coverage of ESG Part 1. The Register Committee concluded that the agency remains partially compliant with the standard.

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ESG 2.2 – Designing methodologies fit for purpose

15. The Register Committee noted that IKCA has standards for external quality assurance and self – guide for higher education institutions undergoing a review with the agency - both publicly available on agency's website. From the report, the Committee learned that there were inconsistencies between the areas covered in the standards and the self – assessment guide.

16. IKCA has a practice of combining multiple programme reviews, sometimes also with the review of the whole institution. A practical example presented by the panel showcases that, sometimes, a clustering of programmes in unrelated study fields was made. The agency did not have a written criteria on how the programmes are clustered and how combined reviews are conducted.

17. IKCA took in consideration feedback from universities and experts when creating the methodologies. Stakeholders, however, were not directly involved in its development. The panel noted that in practice there is an absence of systematic approaches to involving broader stakeholders in the developing, updating and reviewing of its methodologies. For example, the Expert Councils, which should act as advisory boards for the development of the methodologies, are not fully embedded in agency's consultations and improvement processes. The councils do not include students.

18. The Committee found that the approach to clustered reviews, which lacked clarity, could affect the comprehensive evaluation the programmes under review. The Committee also found that the involvement of stakeholders in developing and reviewing of the methodologies was not systematic and substantial. The Committee concurred with panel's conclusion of partial compliance.

19. In the additional representation, IKCA explained that the updated external QA methodologies (see also agency's response in additional representation under ESG 2.1) are now aligned with the self – assessment guide. It also added that it set rules for clustering programmes in its methodology for specialised (programme) accreditation.

20. In addition, IKCA briefly stated that it has established a process for inclusion of stakeholders in the design of methodologies as consultants. No further evidence was provided.

21. The Register Committee welcomed the changes regarding the alignment of IKCA's methodologies and guidelines and the definition of procedures for combining multiple programme accreditations in one process. The Committee, however, did not find IKCA's arguments convincing regarding its current approach in the involvement of stakeholders in the development and reviewing of the methodologies. The Register Committee concluded that the agency does not have a systemic mechanism for the continuous involvement of different/ stakeholder communities in the design and the update of its processes and criteria. The Committee therefore maintained the view of panel, that IKCA complies only partially with the standard.

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ESG 2.3 – Implementing processes

22. The Register Committee learned from the panel's analysis that the content of IKCA's reports differ as panels focus on different criteria of the standards. The Register Committee saw this issue in the light of the standard tackling the consistency of application of the criteria for outcomes [see ESG 2.5].

23. The Committee found that the requirements of the ESG 2.3 are fulfilled (i.e. IKCA has a documented and published review process, which is consistently applied) and could not follow panel's judgement. The Committee concluded that the agency is compliance with the standard and further addressed the inconsistency in the reports under the argumentation in the standard ESG 2.5.

ESG 2.4 – Peer – review experts

24. The Committee learned that the panels in the clustered reviews involved one expert per programme and only one student per panel. While the Committee concurred with panel's judgement of compliance with the standards 2.4, it highlighted panel's recommendation that the agency should consider equitable representation of students in the clustered accreditation reviews, in order to ensure that each study discipline is evaluated with the involvement of a sufficient number of student experts.

ESG 2.5 – Criteria for outcomes

25. The Committee noted that IKCA has guidelines for writing and templates for preparing the reports. Despite these tools, in the analysis of the reports, the panel noted several major inconsistencies including the following: (1) the pre - defined judgements levels were not used by the panels - rather various judgement terminology was applied in different reports; (2) while agency's methodologies have long list of assessment criteria per standard, they were not addressed in full leading to reports covering different topics; (3) thorough analysis and evidence were rarely present in the final reports leading to arbitrary judgements.

26. Considering the above mentioned issues, the Committee concurred with panel's conclusion and found the agency to be non compliant with standard 2.5.

27. IKCA explained in its additional representation that it has updated its accreditation methodologies and that it has organised training for experts (see further in ESG 2.1). The Committee found that the practical implications of the updated standards and the training for reviewers are yet to be demonstrated and that a panel insight is required to show that the judgements in IKCA's reports are indeed consistent. 26. Considering the above mentioned issues, the Committee concurred with the panel's conclusion and found the agency to be non compliant with standard 2.5.

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ESG 2.6 – Reporting

28. The Committee learned that IKCA published its reports and decisions on its website. The reports with negative decision, however, were not publicly available.

29. The panel also problematised the consistency of the contents of the reports-the Committee took this issue in consideration in reaching its judgement, elaborated further under the standard ESG 2.5. This was done since these particular issues primarily impacted the use of report elements in the subsequent decision-making.

30. The Committee followed panel's view that, in order to ensure full transparency, publication of all reports including the negative ones, is required by the ESG. The Committee concurred with panel's conclusion of partial compliance with standard 2.6.

31. In its additional representation, IKCA showcased a list of all accreditation reports with negative outcomes and presented links to the reports and decisions on its website. The Committee was able to conclude that the agency has all of its reports resulting from a ESG aligned activity, irrespective of the outcome, published on its website. The Register Committee was able to conclude that the agency now complies with ESG 2.6.

ESG 3.1 – Activities, policy and processes for quality assurance

32. IKCA has a Supervisory board acting as a governing body of the agency. The board consists of different stakeholders, including students. The panel noted that, while their formal role is guaranteed, their involvement could be strengthened by being actually included in the development of the strategies of IKCA.

33. The Register Committee concurred with panel's conclusion and found the agency to be compliant with the standard. It, however, highlighted the panel's recommendation that the agency should consider more meaningful involvement of the stakeholders in its work and the creation of strategic documents.

ESG 3.3 – Independence

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34. In IKCA, the founding company has a strong role in the governance and work of the agency. The selections, nominations, appointments and terminations of mandates of the members of the governing and advisory bodies, and the recruitment of the staff members were, directly or indirectly (through the director) made by the founder. The panel could not find an evidence of formal procedure for selection of candidates for the governing bodies or the agency's staff.

35. From the clarification call with the panel, the Committee learned the founding company performed business activities in the field of vocational education only. While at the time of the review there was no conflict of interest between the activities of both entities, the agency did not have procedure for preventing (potential future) conflict of interest with the founding company. In case the company starts operating in the field of higher education too.

36. The director of IKCA, which is appointed and accountable to the founding agency, is a permanent member of the accreditation decision making body (i.e the Accreditation Council). The panel reported that the members of the Accreditation Council did not feel the influence of the director over the decision making process; however a procedure for preventing potential influence was not in place in IKCA.

37. From the review report, the Committee could not verify how the agency ensures its independence from its founder and found the distribution of power among stakeholders in the governing of the agency unequal and managing of the staff dependent on its founder. The Committee noted that the current arrangements include the possibility of the founder (or the director) to use their controlling stake in several regards, causing a substantial risk of infringement on the agency's operational and organisational independence of the agency. Following this, the Committee concurred with panel's conclusion and found the agency to be only partially compliant with the standard 3.3.

38. In response to the Committee's initial conclusion, IKCA explained that the status of the founder has now been changed from a company to an individual. The competences, though, remain the same and the supreme governing body of IKCA is the founder [Chapter 3 of the Charter of the Non-Profit Institution "Independent Kazakhstani Center for Accreditation", 2023].

39. IKCA also stated that the procedures regulating the work of the agency have been updated to add more clarity in the selection process of its members in the different bodies. The Committee learned that the agency has established a working group consisting of the agency's employees tasked with preparing a list of potential candidates for these different bodies. The list is prepared based on proposals by "authorized bodies in the field of education, associations, professional and student unions", which is then submitted as a proposal to the Founder for approval. The agency does not

offer any further explanation on who are these organisations nor how the selection is made after the proposals are submitted.

40. IKCA further explained the competences of the director, highlighting that their role in the Accreditation Council is rather managerial. The Director, though present at the meetings is not considered to be a member of the Council, and he/she does not have voting rights.

41. Having carefully considered the newly presented evidence the Committee found that the agency took meaningful step toward ensuring the independence from its founder and considered that the concerns regarding the influence of the Director over the formal outcomes addressed.

42. The Committee, however, found that even in the present arrangements, the founder maintains a dominant figure in the work of the agency. His/her position could endanger the organisational and the operational independence of IKCA, especially in the absence of an independent stakeholder governing body. The Committee found also that further clarity is needed in the selection processes of its different bodies.

43. Following this, the Committee concurred with the panel's judgement of partial compliance with the standard 3.3.

ESG 3.4 – Thematic analysis

44. By the time of the review, IKCA hasn't published any thematic analysis. The panel looked into two unpublished documents which were synthesis of accreditation results and found that these do not represent a thematic analysis i.e., the text didn't include any further interpretation of the results and reflections.

45. From the report, the Committee has learned that there is an awareness within the agency regarding this particular issue. The Committee though, could not see any strong evidence of planned and taken concrete steps to improve its work in the area of doing thematic analysis. Taking in consideration that the agency did not perform any analysis of its quality assurance results, nor has established system and procedures for producing thematic analysis, the Committee found IKCA non – compliant with the standard 3.4.

46. In its additional representation, IKCA explained that since the site visit in 2022, the agency initiated and published several thematic analyses. The agency also updated its Development Strategy to accommodate topics for future analysis. The Committee analysed further the published research on IKCA's website and concluded that not all of the work can be classified as thematic analysis as understood by the ESG. In addition, it found that the enlisted topics are more of broad ideas rather than concrete research questions.

47. Following this, the Committee concluded that IKCA has yet to develop a systematic approach in its thematic analysis. The Committee, however, acknowledged that the agency started taking more concrete steps towards

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publishing analysis from its own external QA findings. Taking in consideration the recent developments, the Register Committee found the agency to be partially compliant with the standard.

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ESG 3.5 – Resources

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48. The panel noted that the agency had sufficient human and financial resources. The Committee learned that the agency is aiming to increase the number of reviews in the field of higher education in the future and use the additional income to further develop its external quality assurance processes in this domain.

49. The Committee learned that the agency was using the office space of its founder. The Committee inquired to know whether the agency could maintain its activities irrespective of the founder's support. In the clarification call with the agency, the panel explained that the founder and agency's work is intertwined – they are both part of a family business in which the founder has the main stake in both entities. A clear distinction between the founder and the agency could not be made (see explanation under ESG 3.3.). The panel was confident that the agency has sustainable resources for the near future.

50. Following this, the Committee was able to follow panel's conclusion of compliance with standard 3.5.

ESG 3.6 – Internal quality assurance and professional conduct

51. IKCA's internal quality assurance system involved gathering feedback from stakeholders via questionnaire and direct communication through its regional staff. The panel noted that, however, the mechanisms were not fully utilised as the agency was not using the feedback for further development of its internal work.

52. The panel further described that some of the processes (e.g. the accreditation process and the appeals and complaints procedures) lacked clarity regarding the responsibilities of the different bodies within the agency.

53. The Committee considered that IKCA has some mechanisms for internal quality assurance in place, but they were not fully developed and integrated within overall workflows of the agency. The scarce mechanisms in place were not fully used either. Additionally, the Committee found that the agency could improve the clarity of internal workflows regarding the accreditation and the appeals and complaints procedures. The Register Committee concurred with panel's conclusion and found the agency to be comply only partially with standard 3.6.

54. In its additional representation, IKCA described several changes following the recommendations from the external review – such as merging of the bodies for appeals and complaints to avoid duplications of functions and further specified the roles of the members of the Accreditation Council.

54. The Register Committee noted that the agency is receptive to the

feedback coming from the external review process and welcomed the changes. The Committee, however, found that the agency is yet to demonstrate how it employs the feedback gathered through its internal quality assurance feedback mechanisms to improve its work. In this sense, further panel insight is expected to demonstrate whether and how the agency translates this feedback into the work performed by its own staff, the members of the different bodies etc. (see also ESG 2.2).

55. Considering the above mentioned concerns the Register Committee concurred with panel's conclusion that the agency is partially compliant with the standard.

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

Conclusion:

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

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

58. After duly considering IKCA's additional representation, the Register Committee concluded that IKCA does not comply with one standard. The Register Committee therefore remained unable to conclude that IKCA complies substantially with the ESG as a whole.

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59. The Register Committee therefore rejected the application.

60. IKCA has 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.

61. IKCA has the right to appeal this decision of the Register Committee in accordance with the EQAR Appeals Procedure. Any appeal must reach EQAR within 40 days from receipt of this decision.

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