

## Approval of the Application by Turkish Higher Education Quality Council (THEQC) for Renewal of Inclusion on the Register

**Register Committee**  
26 – 27 June 2025

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**Ver.** 1.0  
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<b>Application of:</b>	2024-03-13		
<b>Agency registered since:</b>	2022-10-01		
<b>Type of review:</b>	Full	<b>Site visit:</b>	2024-10-17
<b>External review report of:</b>	2025-04-03	<b>Submitted:</b>	2026-04-28
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)		
<b>Review panel members:</b>	Ieva Vaiciukevičienė, Melita Kovacevic, Susan Frances Hackett, Topias Tolonen,		
<b>Decision of:</b>	2025-06-27		
<b>Registration until:</b>	2030-04-30		
<b>Absented themselves from decision-making:</b>	n/a		
<b>Attachments:</b>	1. <a href="#">External Review Report, 2025-04-03</a> 2. <a href="#">Clarification by the Review Panel, 2025-06-13</a>		

1. The application of 2024-03-13 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2024-04-04.
3. The Register Committee considered the external review report of 2025-04-03 on the compliance of THEQC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the review panel on 2025-06-13.

### Analysis:

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

- *Institutional External Evaluation Programme (IEEP)*
- *Institutional Accreditation Programme (IAP)*
- *International Institutional Accreditation Programme (IIAP)*

6. The Register Committee noted that the review report covered the *International Institutional Accreditation Programme (IIAP)* to the extent possible and only based on the documentation available, as at the time of the site visit no procedures had been concluded by the agency. The Register Committee, therefore, expects that THEQC informs the Committee by submitting a substantive change report once the activity is fully operational and the agency has concluded a procedure under this activity.
7. The Register Committee found that the report provides sufficient evidence and analysis on THEQC's level of compliance with the ESG.
8. With regard to the specific European Standards, the Register Committee considered the following:

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### ESG 2.2 – Designing methodologies fit for purpose

9. The Register Committee, noted that THEQC requires each higher education institution to perform self-assessment procedure and prepare a report (ISER) annually, regardless of the institution's participation in the agency's review procedures in that year. The Committee understood that these annual ISER are later considered as part of the review procedures when they take place (ESG 2.3 in review report).
10. While the Register Committee could follow the panel's conclusion and judgement of the standard, the agency should consider that the requirement for higher education institutions in preparing and submitting ISER on an annual basis might create a heavy workload and might affect the fitness for purpose of its activities, taking into consideration also the maturity of higher education institutions' internal quality assurance systems after having gone through several external quality assurance procedures.

### ESG 2.4 – Peer-review experts

11. The Register Committee noted that all external quality assurance activity are carried out by an expert panel, including students. The Committee, however, learned that while students are currently involved in every panel their involvement is not made explicit in any internal documentation.
12. The Committee further learned that the experts perform their duties on voluntary basis without receiving any financial support for their work.
13. While the Register Committee concurred with the panel's judgement that the agency continues to comply with the standard, it underlined the panel's recommendation that student involvement in expert panels should be ensured by mandating it in the agency's rules and regulations. The Committee further underlined the panels recommendation that the agency should explore ways of remunerating experts for their work.

### ESG 2.5 – Criteria for outcomes

14. In its last decision, the Register Committee found the agency partially compliant due to the lack of consistency in the decision making.

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15. The Committee learned that since the last review the agency has established a trustworthy and accessible framework with focus on consistency in its decision making – by developing the Rubric, a methodological tool that links criteria and sub-criteria with the maturity levels of PDCA elements.

16. The Committee further learned that the consistency in the decision making is additionally safeguarded by checks done by the agency's Commission on Institutional External Evaluation and Accreditation.

17. The Register Committee sought clarification by the panel, related with the panel's recommendation under ESG 2.6, but related with the publication of the scores of the IAP and IIAP procedures.

18. The panel clarified that while 'the Rubric' methodology created by the agency helps higher education institutions in understanding the criteria and the final outcome (scores) from the review procedures, the final scores of the IAP and IIAP procedures are not published with the reports which would increase the transparency of the review outcomes. (see Annex 2)

**19. Following the developments implemented by the agency, through the introduction of the Rubric tool and its impact on consistency in the decision making of THEQC, the Register Committee was able to concur with the panel's conclusion and found that the agency complies with the standard. The Committee underlined the panel's recommendation (under ESG 2.6 in the report) that the agency should consider publishing the final scores of its procedures in the final review reports in order to strengthen transparency of the outcomes.**

### ESG 3.3 – Independence

20. In its last decision, the Register Committee found the agency to be partially compliant due to THEQC's workforce that was heavily consisting of (academic) experts working at the agency but being paid by their higher education institutions.

21. The Register Committee, learned that while the number of permanent staff has increased since the last focused review, the number of seconded experts working at the agency while being paid by their higher education institutions remains 'significant' (10 out of 44 permanent staff members).

**22. Considering that the concerns from the last decision regarding the dependency of the agency on staff being paid by higher education institutions remained, the Register Committee concurred with the panel that the agency remains to be partially compliant with the standard.**

### ESG 3.6 – Internal quality assurance and professional conduct

23. The Register Committee learned that the implemented internal process-based management system, designed to maintain the organisational structure of THEQC, is not working effectively as an internal quality assurance system for the agency.

24. In connection with the above-mentioned deficiencies of the agency's internal quality assurance, the Register Committee further noted the panel's concerns about the efficiency of the monitoring of THEQC's performance indicators. These indicators are listed in the Strategic Plan, but are being monitored solely by one staff member who is not actively involved in the process of strategic planning.

25. **Considering the concerns raised above, the Register Committee concurred with the panel that the agency is partially compliant with the standard. The Register Committee underlined the panel's recommendation that the agency should review its internal process-based management system in order to simplify and clarify issues such as an employee's line management and lines of accountability.**

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

### Conclusion:

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

Standard	Previous decision (2023-03-03)	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	Compliance	Compliance
3.2	Compliance	Compliance	Compliance
3.3	Partial compliance	Partial compliance	Partial compliance
3.4	Compliance	Compliance	Compliance
3.5	Compliance	Compliance	Compliance
3.6	Compliance	Partial compliance	Partial compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

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

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29. The Register Committee therefore approved the application for renewed THEQC's inclusion on the Register. THEQC's renewed inclusion shall be valid until 2025-04-30<sup>1</sup>.

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

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<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §3.25 of the EQAR Procedures for Applications.

## Application by THEQC for Renewal of Registration

Clarification provided by the Panel

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<b>Date of the conversation:</b>	2025-06-13
<b>Panel members:</b>	Melita Kovacevic, Ieva Vaiciukevičienė
<b>Representative of EQAR:</b>	Blazhe Todorovski

1. THEQC has submitted on 2024-03-13 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR). On 2025-04-28, THEQC submitted the external review panel's report of 2025-04-03.
2. In order to prepare the deliberations of the Register Committee on THEQC's compliance with the ESG, EQAR contacted the Panel to clarify the matter(s) below.

### International Institutional Accreditation Program (IIAP)

3. EQAR representative asked the panel to elaborate at what level of development and implementation the International Institutional Accreditation Program (IIAP) was at the time of the site-visit and whether the developed methodology and criteria for this programme differed significantly from the methodologies and criteria for the other two ESG-aligned activities of the agency.
4. The panel explained that at the moment of the site-visit the agency has not conducted any procedure of this newly introduced activity and that based on the received documentation and information received during meetings with THEQC staff, responsible for this new activity, the panel noted that the documentation, methodology and criteria are alike the other two activities offered by THEQC.
5. The panel, however, noted that the minor differences they have noted:
  - 5.1. IIAP is applicable only for cross-border HEIs and is a voluntary assessment;
  - 5.2. Turkish HEIs under IEEP and IAP are obliged to reimburse the travel, accommodation expenses and meals of the panel, in the case of IIAP, the costs of the assessment are settled in the agreement between the foreign HEI and THEQC;
  - 5.3. IIAP includes a role of a review coordinator (THEQC's staff member), who is screening HEI's initial application, other documentation and the report by the panel, participates in every panel's meeting and deals with

organisational matters and etc.); In IEEP and IAP organisational matters are laid on the shoulders of the panel members;

5.4. There is a separate Institutional Self-Evaluation Report (ISER) Writing Guide for IIAP, which is adjusted for international HEIs;

5.5. Alongside with the general requirements for panel members, there are 2 additional requirements for IIAP panels - at least 3-years work experience in the field of higher education quality assurance and a high level of competences in the language used for evaluation;

5.6. The evaluation criteria for IIAP have a very similar framework as other types of assessment (IEEP and IAP) with very minor changes to exclude aspects specifically relevant to Turkish national requirements.

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### ESG 2.2 – Designing methodologies fit for purpose

6. EQAR representative asked to panel to further elaborate on the difference between between the follow-up programme and mid-term evaluation programme of accredited institutions and whether the mid-term evaluations are burdensome for higher education institution in the panel's view.
7. The panel explained that Mid-term Evaluation Program are focused for institutions that have undergone the Institutional Accreditation Programme (IAP) and the Follow-up Program procedures are only following the Institutional External Evaluation Program (IEEP) and they only differ in the consequences, where mid-term evaluations can lead to the change in accreditation decisions.
8. The panel further underlined that, in their perspective and through the meetings they had with institutional representatives, the mid-term evaluation was not perceived as burdensome.
9. The panel noted that the mid-term evaluations, provided stable workload for institutions, meaning that institutions were aware and considered this processes as predictable as they are aware how to prepare and what is expected from this procedures.

### ESG 2.5 – Criteria for outcomes

10. EQAR representative asked the panel to elaborate and share their perspective on their recommendation noted under ESG 2.6 related with 'the Rubric' created by the agency and the actual scores that higher education institutions achieve, but they are not part of the published reports.
11. The panel explained that 'the Rubric' was created by THEQC, in order for higher education institutions to better understand the criteria and the final outcome (scores) from the procedures.
12. The panel further noted that indeed the scores are not part of the final report and that's was the reason for the panel to include this recommendation under ESG 2.6. The panel, further, noted that during the

interviews with institutional representatives, they felt that institutions were very positive about the rubric system and the scores they achieve following a review.

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### ESG 3.6 – Internal quality assurance and professional conduct

13. EQAR representative asked the panel to clarify why their findings and recommendations related with the internal process-based management system has been highlighted as an issue under ESG 3.6 rather than ESG 3.1.
14. The panel clarified that in their perspective these are issues with the internal organisation, task responsibility and the unclear roles and processes within the structure of the agency. Therefore they considered this an issue of ESG 3.6 hence their judgement of partial compliance with the standard.

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