

Decision on the Appeal by Independent Kazakhstan Center of Accreditation (IKCA) against the Decision to inclusion on the Register

Appeals Committee

12 May 2026

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 1 / 6

Application of:	2024-04-29
Agency registered since:	n/a
External review report of:	2025-02-24
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Gaga Gvenetadze, Heli Mattisen, Pegi Pavletic,
Register Committee decision of:	2025-11-18
Appeal of:	2025-12-30
Appeals Committee decision of:	2026-03-04
Attachments:	<ol style="list-style-type: none"> 1. Register Committee decision, 2025-11-18 2. Appeal by IKCA, 2025-12-30 3. Annex to the Appeal by IKCA, 2025-12-30

I. The Appeal Case

1. On 2024-04-29 Independent Kazakhstan Center of Accreditation (IKCA) applied for inclusion on the register, based on a focused external review coordinated by the European Association for Quality Assurance of Higher Education (ENQA).
2. The EQAR Register Committee deferred the application by its decision of 2025-06-27 and invited IKCA to make additional representation. On 2025-09-09 IKCA submitted its additional representation.
3. The EQAR Register Committee rejected the application by its decision of 2025-11-18 (hereinafter “the Appealed Decision”).
4. IKCA made an appeal against the decision on 2025-12-30 (hereinafter “the Appeal”).
5. Conflicts of interest related to the members of the Appeals Committee were not identified. Due to unavailability by the chair of the Appeals Committee Paul Zoontjens, he was replaced by Jiří Nantl, as deputy chair. Due to unavailability of Janja Komljenovič, she was replaced by Tatjana Volkova as deputy member.
6. The Appeals Committee considered the appeal at its meeting on 2026-03-04.

II. Criteria and Factual Basis for Appeal Decisions

7. The Appeals Committee established its findings following the terms of reference as laid down in Art. 21 of the EQAR Statutes and Art. 1 and 2 of the Appeals Procedure:

EQAR Statutes

Article 21: Appeals

(1) The applicant can file an appeal against decisions of the Register Committee on procedural grounds or in the case of perversity of judgement.

(2) The Appeals Committee shall either reject or allow the appeal. If the appeal is rejected, the Register Committee's decision is final. If the appeal is allowed, the Register Committee shall reconsider the Application, taking due account of the grounds of the appeal and the Appeals Committee's decision.

(3) Further provisions shall be made in the Appeals Procedure.

Appeals and Complaints Procedure

Section 1: Appeals

1. Grounds of appeal

1.1. Applicants may, within the scope of appeal outlined in Art. 2 below, appeal against a decision of the Register Committee claiming that:

- a. the Register Committee has violated EQAR's statutes or secondary regulations, general legislation, or any commonly accepted principles of fair and equal procedures ("procedural grounds" according to art. 21 (1) of the Statutes); or*
- b. the Register Committee's decision was unreasonable or disproportionate in the light of the available evidence ("perversity of judgement" according to art. 21 (1) of the Statutes), for example in that the Register Committee has*
 - not considered or misunderstood certain facts and/or evidence duly provided in the proceedings; or*
 - based its decision on facts and/or evidence which were not duly provided in the proceedings; or*
 - not used or exceeded the scope of discretion at its disposal; or*
 - based its decision on considerations which are evidently not substantially related to the issue in question; or*
 - failed to consider an aspect which is likely to be of substantial relevance for the decision.*

2: Scope of Appeal

2.1. An appeal seeks to change the decision that is being appealed. If an applicant wishes to raise its dissatisfaction with the process

Appeals Committee

12 May 2026

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 2 / 6

without seeking a change of the decision, they should make a complaint.

2.2. The appeal may only be based on those facts which have been duly introduced into the proceedings of the Register Committee and shall clearly state the grounds for appeal.

2.3. EQAR's statutes and further regulations shall be relevant for appeals as in effect when the decision appealed against was made.

2.4. Except in case of grave and evident fault, the Appeals Committee will only consider those complaints which the applicant has put forward in the appeal.

Appeals Committee

12 May 2026

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 3 / 6

III. Admissibility of the Appeal

8. The Appeal was submitted within 40 days from receipt by IKCA of the Rejection Decision, as required in Art. 3.1. Appeals and Complaints Procedure (Section 1).

9. The Appeal questioned that the Register Committee's judgement was reasonable and proportionate in the light of the available evidence, according to Art. 1.1 (b) Appeals and Complaints Procedure (Section 1).

10. While IKCA stated that it provided further information and clarification, the Appeals Committee found that the information contained in the Appeal was largely already provided as part of the application process.

11. The Appeals Committee considered the following standards which the applicant has put forward in the Appeal: ESG 2.2; ESG 2.5; ESG 3.3; ESG 3.4 and ESG 3.6.

12. The Appeal was admissible.

IV. Judgement on the Case

13. The Appeals Committee analysed IKCA's claims by considering the ESG standards in question, the appealed decision and the appeal itself, i.e. the request brought forward for the change of the judgement on the level of compliance by the Register Committee.

IV.1 ESG Standards

ESG 2.2 – IKCA claimed that the information provided in the focused review report were unsubstantiated and the issues raised in the rejection have been addressed. Therefore, IKCA requested a change of judgement from partially compliant to compliant with the standard.

14. The Appeals Committee noted that the appealed decision clearly took note of and welcomed some of the improvements made by the agency. However, the Appeals Committee underlined that the Register Committee noted the persisting issues of unclear application of clustering criteria and limited stakeholder involvement. The Appeals Committee found this to be a sufficient, reasonable and justifiable ground for maintaining the Register Committee judgement with the standard.

15. **Therefore, the Appeals Committee concluded that the claim by IKCA related to ESG 2.2 is not substantiated.**

ESG 2.5 – IKCA claimed that during the focused review and prior to the submission of the application to EQAR, the agency has addressed the issues in its internal documents and therefore, IKCA requested a change of judgement from non-compliant to partially compliant with the standard.

Appeals Committee
12 May 2026

16. The Appeals Committee noted that the appealed decision clearly considered and referenced the steps made by the agency. However, the Appeals Committee underlined that the Register Committee noted the *'continued absence of a formal consistency-ensuring mechanism, the misalignment between reporting practices and internal guidance, and the lack of robust evidence in reports, the persisting issues of unclear application of clustering criteria and limited stakeholder involvement'*. Since the appeal does not successfully demonstrate that this judgement is unfounded or based on factual inaccuracies, the Appeals Committee found this to be a reasonable and justifiable ground for maintaining the Register Committee judgement with the standard.

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 4 / 6

17. Therefore, the Appeals Committee concluded that the claim by IKCA related to ESG 2.5 is not substantiated.

ESG 3.3 - IKCA claimed that the issues raised regarding operational and organisations independence in the initial rejection have been addressed and therefore, IKCA requested a change of judgement from partially compliant to compliant with the standard.

18. The Appeals Committee noted that the appealed decision noted the progress made and welcomed the actions taken in reducing the founder's influence within the agency. However, the Appeals Committee underlined that the Register Committee also considered that the agency could still not demonstrate that issues identified in the initial decisions related to organisational and operational independence have been resolved, which the Appeals Committee found a reasonable and justifiable ground for retention of the Register Committee judgement with the standard.

19. Therefore, the Appeals Committee concluded that the claim by IKCA related to ESG 3.3 is not substantiated.

ESG 3.4 – IKCA claimed that the Register Committee did not consider or has misunderstood evidence that has been duly provided in the proceeding, namely the *'Thematic analysis based on the results of the institutional and specialised accreditation of higher and postgraduate education organisations'* conducted by the agency for the period from 2020 to 2023, as well as the Thematic analysis for 2024, which in IKCA's view demonstrates compliance with the standard. Therefore, IKCA requested a change of judgement from partially compliant to compliant with the standard.

20. The Appeals Committee considered the claim by IKCA by taking a closer look at the Appealed Decision and the Appeal itself.

21. Appeals Committee underlined that the Register Committee was aware of and duly considered both elements of IKCA's appeal related to this standard: inclusion of thematic analyses as one of the elements of IKCA's strategic planning, and two documents dealing with reviews conducted between 2020 and 2024. However, the Register Committee concluded that

this is not sufficient to meet the requirements of ESG 3.4 and found that there is continued absence of proper implementation of these plans. The Appeals Committee found this lack of proper thematic analysis documents a reasonable and justifiable ground for maintaining the Register Committee judgement with the standard.

22. Therefore, the Appeals Committee concluded that the claim by IKCA related to ESG 3.4 is not substantiated.

ESG 3.6 – IKCA claimed that its internal quality assurance mechanisms have been in place and that the Register Committee did not consider or has misunderstood certain evidence that have been duly provided in the proceedings which proved the compliance with the standard. Therefore, IKCA requested a change of judgement from partially compliant to compliant with the standard.

23. The Appeals Committee emphasised that the appealed decision took note of the improvements and progress made by the agency. However, the Appeals Committee underlined that the Register Committee noted the *'continued weakness in the distribution of responsibilities within IKCA regarding its internal quality assurance, deficiencies in closing the feedback loop, and issues identified in relation to the agency's policy on its internal quality assurance'*, and the appeal does not effectively demonstrate that this conclusion was unfounded or based on factual inaccuracies. Since the appeal does not successfully demonstrate that this judgement is unfounded or based on factual inaccuracies, the Appeals Committee found this to be a reasonable and justifiable ground for maintaining the Register Committee judgement with the standard.

24. Therefore, the Appeals Committee concluded that the claim by IKCA related to ESG 3.4 is not substantiated.

V. Concluding Judgement and Decision

25. Based on the considerations above, the Appeals Committee concluded that IKCA did not provide convincing evidence for perversity of judgement for any of the standards and that the Register Committee's judgement on the appealed standards was reasonable and proportionate in the light of available evidence.

26. The Appeals Committee further noted the extensive materials that IKCA has submitted as a part of the appeal mainly relate to claims against the review panel report, and not the Register Committee's decision, making the significant part of the appeal materials outside the scope of a proper appeal against a Register Committee decision.

27. Therefore, the Appeal by IKCA is considered not substantiated. The Appeals Committee consequently rejects the Appeal.

28. According to Art. 4.3 of the Appeals Procedure, the Appealed Decision of 2025-11-18 is final.

Appeals Committee

12 May 2026

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 5 / 6

Brussels, 12 May 2026

Jiří Nantl, deputy Chair

Carolyn Campbell, member

Tatjana Volkova, deputy member

Appeals Committee

12 May 2026

Ref. AC/A165

Ver. 0.1

Date 2026-05-07

Page 6 / 6





«Аққредиттеудің тәуелсіз
Қазақстандық орталығы»
коммерциялық емес мекеме
Қазақстан Республикасы, Z10M4F7
Астана қаласы, Гете көшесі, 15
тел.: +7 (7172) 249 747, info@nkca.kz

«Independent Kazakhstani
Center of Accreditation»
non-profit institution
15 Gorthe str, Astana
Z10M4F7, Republic of Kazakhstan
tel.: +7 (7172) 249 747, info@nkca.kz

Некоммерческое учреждение
«Независимый Казахстанский
Центр аккредитации»
Республика Казахстан, Z10M4F7
город Астана, улица Гете, 15
тел: +7 (7172) 249 747, info@nkca.kz

УСХ № 748
26.12.2025

Appeals Committee EQAR

The Non-Profit Institution Independent Kazakhstani Center for Accreditation (IKCA), in accordance with the EQAR registration procedures, expresses its disagreement with the decision of the EQAR Register Committee to refuse registration in the Register and hereby submits an appeal against this decision.

By submitting this appeal, the IKCA management first and foremost asks the Committee to take into account the fact that, in our organization's opinion, one of the ENQA principles set out in the ENQA Agency Review Handbook was violated during the external review conducted by the ENQA panel. In particular, among the stated principles ("Agency reviews are conducted by ENQA in accordance with the following principles..."), we highlight the following: "The level of compliance with the ESG required for ENQA membership is 'substantial compliance', not strict compliance" (Section 2.2).

The conclusions of the ENQA expert panel allow us to assert that, during the review, our agency was required to comply with all ESG standards and guidelines in an extremely strict manner. Any minor deviation was assessed as a remark and resulted in a low score, up to a finding of non-compliance with a standard, despite the fact that the ESG standards are, quite reasonably, framework in nature.

Taking into account the openness of the ENQA and EQAR websites, we analyzed similar reports of other Kazakhstani agencies (IQAA, IAAR, ARQA, CAAAE) that were registered with ENQA and EQAR without difficulty. We did not observe such an excessively strict approach to assessing ESG compliance by ENQA panels in those cases.

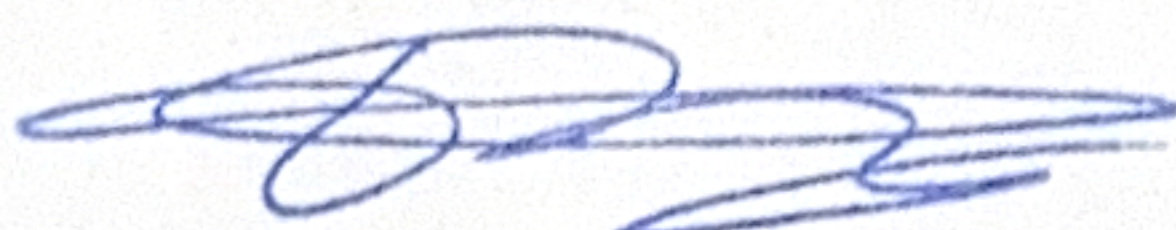
In the Annex to our appeal, we present the main arguments that we submitted twice to the Register Committee—in our submission dated 14 April 2025 and in the Additional Submission dated 9 September 2025.

In our view, in both instances even our indisputable evidence demonstrating the unreasonableness of certain conclusions of the ENQA panel was not taken into consideration.

The IKCA management hopes that a thorough review of the arguments presented in this appeal and its Annex will enable the Appeals Committee to accept them and recommend that the Register Committee change the assessment of “non-compliant” to “partially compliant” for ESG Standard 2.5 – Outcomes Criteria, as well as change the assessments of “partially compliant” to “compliant” for the following four standards: ESG 2.2 – Development of methodologies appropriate to the stated objectives, ESG 3.3 – Independence, ESG 3.4 – Thematic analysis, ESG 3.6 – Internal quality assurance and professional conduct.

Annex: Additional explanations regarding the above four standards and 11 annexes.

Director



Khalmuratov B.O.

Prepared by: Adilgazynov G.Z.

Tel.: +7-7172-249747

ANNEX
to the Appeal Letter of the Non-Profit Institution
“Independent Kazakhstani Center for Accreditation”

1. ESG STANDARD 2.2 – DESIGNING METHODOLOGIES FIT FOR PURPOSE

With regard to points 15–16 of the Decision of the Registration Committee dated 18 November 2025, the IKCA expresses its disagreement with the conclusions regarding the alleged lack of clarity in the grouping of programs during accreditation procedures, the claim that their application is insufficiently transparent, and that further clarification is required.

In the internal regulatory document of the IKCA, “Guidelines for Clustering Programs in the Course of Specialized (Program) Accreditation of the Non-Profit Institution ‘Independent Kazakhstani Center for Accreditation’”, paragraph 3 states:

“Clustering is carried out on the basis of the relatedness of programs in accordance with the fields of study defined by the Classifier of Fields of Training for Higher and Postgraduate Education (Order of the Minister of Education and Science dated 13 October 2018, No. 569).”

This Classifier is attached to the document.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/InstrClassterEn.pdf>

As can be seen, our actions in grouping programs are based on a regulatory document of a state authority that governs this activity. Therefore, everything here is clear and transparent. In full compliance with this regulatory document and the Guidelines developed on its basis, the IKCA acts accordingly.

In the **Additional Submission** to the IKCA’s application for registration dated 09 September 2025, in the attached table with comments on the remarks contained in the ENQA review panel report, we clearly demonstrate the erroneous nature of the conclusions drawn by the ENQA experts, who alleged violations of our program clustering procedures using the example of institutional and specialized accreditation at the Regional Innovation University in June 2024 (items 34–35 of the table).

In point 16 of the Decision, the Registration Committee agrees with the opinion of the ENQA experts that stakeholders were not sufficiently involved in the development and improvement of IKCA’s standards, guidelines, and methodologies.

First, it is unclear where and how this level of sufficiency or insufficiency of the aforementioned involvement is defined. In our view, this represents a purely subjective approach, without any clear criteria for determining such sufficiency.

Second, during the period 2023–2024, the IKCA did not develop any new standards.

Third, in our **Additional Submission**, in the table with comments on this remark, we attached copies of the minutes of meetings of the Expert Council on Pedagogical Education. These documents demonstrate how stakeholders are involved in the

process of standard development, and how, starting from the adoption of the professional standard “Teacher” in 2022, the issue of involving stakeholders in the development of standards for institutional and specialized accreditation in pedagogical education was gradually raised at the meetings of this Expert Council. Subsequently, in March 2023, these standards were discussed and approved with the participation of stakeholders.

Regarding the remark in point 17 of the Committee’s Decision, where the Committee agrees with the opinion of the ENQA review panel experts about inconsistencies between the areas covered by IKCA’s standards and the accompanying guidelines, we express complete disagreement. During the first audit of the IKCA in 2023, we presented to the ENQA expert panel, in printed form within a single brochure, all accreditation standards and the corresponding Guidelines, which fully corresponded to each other. It is evident that the ENQA experts drew their erroneous conclusion about inconsistencies based on the fact that, at that time, the IKCA website deliberately displayed abbreviated versions of our standards. This was done following the experience of the NAOKO agency, in order to prevent possible competitors from borrowing the content of the standards from newly established agencies.

With regard to point 18, we are confident that if our arguments—some of which are presented above, and the majority of which were contained in the Additional materials submitted in the table for ESG Standard 2.2—had been thoroughly examined, the Committee, having positively assessed our arguments under this standard, would have reached the assessment of “complies” for ESG Standard 2.2 – Development of methodologies aligned with the set objectives.

Based on all of the above, the IKCA management requests that the Appeals Committee recommend to the Registration Committee to change the assessment for ESG Standard 2.2 – “Development of methodologies aligned with the set objectives” from “partial compliance” to “complies.”

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE			
32	Page 41 of the ENQA commission report: Only several issues remained concerning institutional assessment of medical institutions. In case of standard 6. Educational resources, criteria 6.4 Medical research and scientific advances; 6.5 Educational expertise, and 6.6 Exchange in education were added to the guidelines, but did not exist in the standards.	This remark is unfounded, since the above criteria are presented in exactly the same way in the Standards for the Accreditation of Medical Education Organizations (institutional and specialized) and in the relevant Guidelines.	Standards for institutional accreditation of medical Organizations of higher and postgraduate education (OHPE) https://nkca.kz/en/standarty

			<p>Guidelines for the preparation of a self-assessment report within the framework of institutional accreditation of medical education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/IaMed/2/RukovodSamoIAMEDen.pdf</p>
33	<p>Page 41 of the ENQA commission report:</p> <p>The same applies to the standards for programme assessment of pedagogical institutions, related to standards 2 and 5. Under these two standards, there is also a mismatch in the number of criteria. In some cases, for example criteria 6.1 and 6.4 in the guidelines for institutional assessment of pedagogical institutions, no evidence is asked from the HEIs to demonstrate compliance with these criteria</p>	<p>Due to the specific nature of the criteria 6.1 and 6.4 of the standards for institutional accreditation of pedagogical education organizations, it was not necessary to provide documentary evidence; in the column “Evidence that the educational institution meets the criteria of the standard,” an explanation is given of what evidence must be provided according to these criteria!</p>	<p>Page 27-28</p> <p>GUIDELINES for the preparation of a self-assessment report within the framework of institutional accreditation of higher and postgraduate teacher education organizations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Rukovodstvadoki/_%D0%98%D0%90%20%D0%9E%D0%92%D0%9F%D0%9E%20%D0%BF%D0%B5%D0%B4%20ENG.pdf</p>

34	<p>Page 42 of the ENQA commission report:</p> <p>Aside from the described clustering practices, the panel found that IKCA sometimes continues to cluster programmes belonging to different study fields, with the production of separate reports. An example of such clustering is the programmatic accreditation at the Institution accredited in November 2023, where the same panel was responsible for the assessment of programmes from different study fields. Those programmes were: ‘Chemistry’, ‘Biology in Education’, ‘Translation studies’, ‘Teacher of chemistry and biology’, ‘Teacher of geography and history’.</p>	<p>This remark is not correct, because These educational programs belong to one area (“Pedagogical Sciences”) of the Classifier of Areas of Personnel Training, that is, in accordance with Instructions for combining educational programs into clusters during specialized (program) accreditation of the IKCA This formation of clusters was correct.</p>	<p>Instructions for combining educational programs into clusters during specialized (program) accreditation of the IKCA</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/InstrClassterEn.pdf</p>
35	<p>Pages 42 of the ENQA commission report:</p> <p>The panel also found that IKCA sometimes combines institutional and programmatic accreditation, for example, in the case of an institution accredited in July 2024. Out of five members of the EEG for institutional accreditation, three simultaneously assessed three different programmes (Finance, Economics, Accounting) while two experts assessed five different programmes at the same time (Finance, Economics, Accounting, Management, Customs). Paralelly, during the same site visit, seven experts assessed five different programmes simultaneously (Chemical Engineering, Electroenergetics, Automation and Control, Construction, Oil and Gas Business). The site visit lasted a total of three</p>	<p>This remark of the ENQA commission is incorrect, since in accordance with the order of the IKCA Institutional accreditation was carried out by the IKCA expert group from June 12 to 14, 2024, and program accreditation began on June 13 and ended on June 14. Institutional accreditation was carried out by an expert group consisting of 5 experts: Ermekbaev S.B. - head of the EEG, Madanbekov N.Zh. (Bishkek, Kyrgyz Republic) - international expert, Kylyshbaeva G.B. - national expert, Taldakhmetov B.Sh. - employer expert and Seidaly Nurasy1 - student expert. This group worked separately, dealing only with institutional accreditation from June 12 to 14, as required for 3 days.</p> <p>Independently of this group, specialized accreditation was conducted from June 13 to 14 for 13 programs, united in full compliance with the relatedness of the areas of the Classifier of educational programs in three clusters. At the same time,</p>	<p>Scan of the order of the IKCA on conducting an external audit at the Regional Innovation University.</p> <p>Instructions for combining educational programs into clusters during specialized (program) accreditation of the IKCA</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/InstrClassterEn.pdf</p>

	<p>days, with the interviews conducted mainly during the first day. This means that all programmes were assessed parallelly with the institutional accreditation procedure, in 30-minute interviews, mostly on that first day.</p>	<p>by other experts, not those who were part of the EEG for institutional accreditation. As evidence, we provide the assignment of programs in each cluster:</p> <p>For cluster 1:</p> <p>Sabyrova M.E. - candidate of economic sciences - for programs 6B04106 - Economics and 6B04108 - Accounting and auditing;</p> <p>Mustafayeva B.U. – PhD in Economics – for programs 6B04109 – Finance, 6B04107 – Management;</p> <p>Elikbai Maksat – candidate of legal sciences – for programs 6B04206 – Jurisprudence and 6B04202 – Customs.</p> <p>For the 2nd cluster:</p> <p>Krykbaev M.M. – Candidate of Technical Sciences (in the Department of Automation and Telecommunications) for the program 6B06202 – Radio Engineering, Electronics and Telecommunications;</p> <p>Berkinbaev K.M. – Doctor of Pedagogical Sciences, Professor for the program 6B06154 – Computer Engineering and Software.</p> <p>For the 3rd cluster:</p> <p>Artykbaev D.Zh. – PhD in construction – for program 6B07303 – Construction;</p> <p>Daribaev Zh.E. – PhD – for program 6B07104 – Chemical engineering and processes;</p> <p>Rustamov N.T. – Doctor of Technical Sciences – for programs 6B07105 – Electric Power Engineering and 6B07106 – Automation and Control;</p> <p>Esentaeva A.A. – PhD in oil and gas engineering – for program 6B07203 – Oil and Gas Engineering.</p> <p>Thus, in the example of the alleged violation given by the ENQA commission, everything was done in full compliance with Instructions for combining educational programs</p>	
--	--	--	--

		<p>into clusters during specialized (program) accreditation of the IKCA.</p> <ol style="list-style-type: none"> 1. Institutional and specialized accreditation were carried out independently of each other by different expert groups; 2. The distribution into clusters is based on the relatedness of programs and in full compliance with the Classifier of Directions of Educational Programs; 3. Each of the experts in specialized accreditation was assigned to write the text of the EEG report on one or two similar programs for which he is a specialist; 4. Each expert group includes an international expert, an employer expert and a student expert, all three in the cluster program area; 5. All audit activities, discussions of assessments, development of comments and recommendations are carried out by the entire group of cluster experts, a collective opinion is developed, only the text of the EEG report for each assigned program is prepared by the expert to whom the program is assigned. 	
36	<p>Pages 42-43 of the ENQA commission report:</p> <p>From the evidence provided by the Agency, the introduction of the instruction manual improved the transparency on the involvement of external stakeholders in consultations about changes to the Standards of IKCA. However, the nature of their involvement was not described, and evidences provided in appendices to the self-assessment report demonstrate IKCA formally inviting several stakeholders to provide written feedback on the already adopted accreditation Standards (letters are from January and April 2024,</p>	<p>This conclusion is not substantiated, since there are minutes of the meetings of the Expert Council on Pedagogical Education.</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. 	<p>Minutes of the meetings of the Expert Council are available and attached (copies)</p>

	<p>while the Standards were adopted in October 2023).</p> <p>There was no evidence provided that the external stakeholders were invited to actively participate in the amendments to these Standards, or even in the writing process of the development of new accreditation standards in the field of pedagogy.</p>	<p>At this meeting, the members of the expert council were presented with the professional standard “Teacher” and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p> <p>At the next meeting No. 2 on March 3, 2023, a discussion took place at a meeting of the Expert Council on Pedagogical Education of the standards for institutional and programmatic accreditation of pedagogical education developed with the participation of stakeholders.</p> <p>Thus, external stakeholders were involved in the process of developing new accreditation standards in the field of pedagogy. The IKCA did not develop any other new standards in the field of higher education during the period 2023-2025.</p>	
37	<p>Pages 43 of the ENQA commission report:</p> <p>The Guidelines for the Organization and Conduct of an External Assessment (Audit) Within the Framework of Institutional and Specialized (Program) Accreditations (clause 4.1) of IKCA state that the members and the chair of the EEG provide feedback on the initial self-assessment report received from the HEI applying to be accredited. Then, IKCA sends the feedback (if necessary) to the HEI, which then has the opportunity to submit the final self-assessment report, taking the feedback into account. The panel asked for further clarifications from IKCA’s executive and senior management on this procedure and found out that only two such</p>	<p>In the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (programme) accreditations, updated before the start of the external visit of the ENQA commission, paragraph 4.1 was changed; the function of the initial examination of the self-assessment report, as was done in practice, was assigned to the employees of the methodology, monitoring and quality assurance department (indicated in paragraph 4.4).</p> <p>In the actual practice of the IKCA, since 2022, the initial feedback on the self-assessment report is given by the employees of the methodology, monitoring and quality</p>	<p>Clause 4.4 of the Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized (program) accreditations</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

	<p>procedures happened in the past. The panel was also informed that the same panel of experts involved in this procedure is the one later participating in the site visit. This could potentially lead to the conflict of interest, since the self-assessment report gets improved based on the feedback from the EEG, which then performs the final assessment. Additional clarification was provided by the agency that the Department of methodology, monitoring and quality assurance checks the initial self-assessment report for compliance with the requirements of the report template. However, the panel highlights that this initial check performed by the Department is separate from the abovedescribed procedure on the feedback provision from the EEG.</p>	<p>assurance department. They assess the report's compliance with the requirements of the report template in terms of structure and design, check whether all the criteria of each standard have been assessed by the report authors during the self-assessment, and whether there are mandatory Appendices to the report. If there are any deviations from these requirements, the report is returned for revision. For work (study, preparation of a set of questions for interviews, etc.), the EEG experts receive a revised version of the self-assessment report accepted by the IKCA as the final version no later than a month before the audit visit.</p> <p>The noted practice of remote assessment by experts of the initial version of the self-assessment report was used in the IKCA until 2022, but has not been used since 2022.</p>	
38	<p>Page 43 of the ENQA commission report:</p> <p>In the regulation concerning Supervisory Board of IKCA, the tasks of this body include the 'development of recommendations and assistance in the priority areas of activities of IKCA'. Similarly, in the regulation concerning the Accreditation Council of IKCA, the 'objectives of the Accreditation Council are internal and external assistance in creating an effective system for ensuring the quality of education and management systems in the organization of education'. Despite both of these bodies having the potential to participate in developing and reviewing the methodologies of IKCA, the panel found no evidence of such engagement. Additionally, no evidence was collected on the involvement of these</p>	<p>Indeed, in accordance with the said Regulation, the Supervisory Board develops recommendations on the priority areas of the IKCA. The IKCA has the minutes of the Supervisory Board meetings of December 25, 2020, April 12, 2022, March 15, 2023, where the Supervisory Board considers and adopts recommendations on partial changes to the IKCA Charter, recommendations on changes to internal documents based on the comments and recommendations of the ENQA external expert commission (based on the results of the first visit of the commission), namely, the Accreditation Standards, the External Audit Guidelines. It was on the recommendation of the Supervisory Board that the document "Policy for identifying and resolving conflicts of interest of the IKCA" was developed and implemented in the work of the IKCA in order to</p>	<p>Copies of the minutes of the meetings of the Supervisory Board and the Accreditation Council are attached.</p>

	<p>two bodies in developing and improving IKCA's Standards and Guidelines.</p>	<p>eliminate possible risks in the activities of the IKCA. Unfortunately, the ENQA commission did not request these documents during the audit, otherwise, in our opinion, the ENQA commission would not have had such a comment on the activities of the Supervisory Board.</p> <p>Members of the Accreditation Council, by virtue of their appointment, work directly with accreditation standards, studying self-assessment reports of educational organizations and their programs, reports of external expert groups, making decisions on them, experiencing in practice how individual criteria of a particular accreditation standard work or do not work. They actively participate in training seminars on the standards and procedures of the IKCA, making individual proposals for updating the Guide to Organizing and Conducting External Assessment. For example, in March 2024, a special meeting of the Accreditation Council was held, at which, among other issues on the agenda, the issue of a possible update of the IKCA accreditation standards and amendments to the Regulation on the Accreditation Council was considered.</p>	
39	<p>Page 43 of the ENQA commission report:</p> <p>The panel found out, during the site visit, that the standards for the field of pedagogy were used in the accreditation of programmes at one of the universities accredited in December 2023. Due to the issues of alignment of standards with guidelines on programmatic assessment in the field of pedagogy, the panel wanted to check whether the report included the analysis of criteria mentioned in the</p>	<p>The standards for specialized accreditation of pedagogical education programs are not completely new standards. They were developed based on the general standards for specialized accreditation, since the specifics of pedagogical educational programs consist only of minor differences in the content of the programs, where we laid down the requirements for the content based on the professional standard "Teacher". Therefore, in the Accreditation Standards for Pedagogical Programs, there are minimal differences from the general</p>	<p>Standards for specialized accreditation of pedagogical educational programs https://nkca.kz/en/standarty</p>

	standards, or those mentioned in the guidelines. However, it was instead established that the report was based on the ‘Standards for Specialized (Program) Accreditation of Higher Education and Postgraduate Education Based on ESG-2015’. The consistency of reports is described in detail under ESG 2.5 Criteria for outcomes.	standards only in 3 criteria of standard 2. "Development and approval of educational programs". Therefore, we do not see a serious error in the fact that accreditation for one pedagogical program indicated in the report was carried out according to general standards. All other pedagogical programs are accredited according to the accreditation standards for pedagogical education.	
40	<p>Pages 44 of the ENQA commission report:</p> <p>However, it remained unclear to the panel whether the students are involved in the other Expert Councils (pertaining to the fields of medicine and pedagogy). In the appendix received by the panel, which contained the minutes of the Expert Council’s meeting, it is not possible to determine whether the teachers and HEI Heads had an active consultatory role on the content of the standards and guidelines, as external stakeholders. From the decisions made, it was apparent that they voted ‘to approve the work of IKCA on updating regulatory documents’, but their level of involvement itself is unknown. IKCA still does not have a policy on consultation developed, and in the interviews with academic staff and the students, they were unaware of the agency’s efforts to consult on the improvements of standards, for example.</p>	<p>In preparation for the external audit, the IKCA drafted an internal document entitled “The procedure for involving experts in the Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation". In Section 3 of this document, entitled "Attracting and selecting stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "IKCA" the actual work carried out is described IKCA on the participation of external stakeholders in the development and updating of the IKCA regulatory framework. In full compliance with this procedureThe IKCA involves teachers and representatives of student youth in the work on updating the content of standards and Guidelines. The ENQA expert commission received feedback on the IKCA documents from the Youth Convention of the Republic of Kazakhstan, the Association of Private Educational Organizations, the Kazakh National</p>	<p>Document "The procedure for involving experts in the Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/PoryadokExpertEn.pdf</p>

		Pedagogical University named after Abay, and academics from the IKCA expert base, in which they, having studied the drafts of updating our documents, gave their opinions on them, their proposals for updating these documents.	
41	<p>Page 44 of the ENQA commission report:</p> <p>The review panel additionally found that the time constraint for performing clustered reviews makes the parallel assessment difficult. It also remains unclear what is the procedure for combining programme assessments with the institutional assessments (as this was not described anywhere in IKCA's documents). The panel finally concluded that the criteria for clustering of programmes is developed but further clarifications are necessary for clustering according to the study-level or when combining institutional and programme accreditation under one site visit</p>	<p>Clause 3 of the Instructions for combining educational programs into clusters based on the relatedness of training areas does not contradict the inclusion of programs of the same name at different levels (bachelor's, master's and doctoral) in a cluster, which is why the IKCA does this in actual practice.</p> <p>There is no and will not be a unification of institutional accreditation with specialized accreditation in the practice of the IKCA. In the practice of the IKCA, there was a case of parallel implementation with a difference of one day of institutional and specialized accreditation at the Regional Innovation University, while institutional accreditation was carried out by one expert group for 3 days from June 12 to 14, 2024, and specialized accreditation, independently of the first expert group for three clusters, was carried out by completely different experts in 2 days - from June 13 to 14, 2024. Namely: Institutional accreditation was carried out by the IKCA expert group from June 12 to 14, 2024, and program accreditation began on June 13 and ended on June 14. Institutional accreditation was carried out by an expert group consisting of 5 experts: Ermekbaev S.B. - head of the EEG, Madanbekov N.Zh. (Bishkek, Kyrgyz Republic) - international expert, Kylyshbaeva G.B. - national expert, Taldakhmetov B.Sh. - employer expert and Seidaly Nurasyly - student expert. This group worked separately, dealing only</p>	<p>Instructions for combining educational programs into clusters based on relatedness of training areas.</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instr/InstrClassterEn.pdf</p> <p>Order on conducting an external audit at the Regional Innovation University</p>

		<p>with institutional accreditation from June 12 to 14, as required for 3 days.</p> <p>Independently of this group, specialized accreditation was conducted from June 13 to 14 for 13 programs, united in full compliance with the relatedness of the areas of the Classifier of educational programs in three clusters. At the same time, by other experts, not those who were part of the EEG for institutional accreditation. As evidence, we provide the assignment of programs in each cluster:</p> <p>For cluster 1:</p> <p>Sabyrova M.E. - candidate of economic sciences - for programs 6B04106 - Economics and 6B04108 - Accounting and auditing;</p> <p>Mustafayeva B.U. – PhD in Economics – for programs 6B04109 – Finance, 6B04107 – Management;</p> <p>Elikbai Maksat – candidate of legal sciences – for programs 6B04206 – Jurisprudence and 6B04202 – Customs.</p> <p>For the 2nd cluster:</p> <p>Krykbaev M.M. – Candidate of Technical Sciences (in the Department of Automation and Telecommunications) for the program 6B06202 – Radio Engineering, Electronics and Telecommunications;</p> <p>Berkinbaev K.M. – Doctor of Pedagogical Sciences, Professor for the program 6B06154 – Computer Engineering and Software.</p> <p>For the 3rd cluster:</p> <p>Artykbaev D.Zh. – PhD in construction – for program 6B07303 – Construction;</p> <p>Daribaev Zh.E. – PhD – for program 6B07104 – Chemical engineering and processes;</p>	
--	--	---	--

		<p>Rustamov N.T. – Doctor of Technical Sciences – for programs 607105 – Electric Power Engineering and 6B07106 – Automation and Control;</p> <p>Esentaeva A.A. – PhD in oil and gas engineering – for program 6B07203 – Oil and Gas Engineering.</p> <p>Thus, in the example of the alleged violation given by the ENQA commission, everything was done in full compliance with the Instruction on clusters and selection of experts:</p> <ol style="list-style-type: none"> 1. Institutional and specialized accreditation were carried out independently of each other by different expert groups; 2. The distribution into clusters is based on the relatedness of programs and in full compliance with the Classifier of Directions of Educational Programs; 3. Each of the experts in specialized accreditation was assigned to write the text of the EEG report for one or two similar programs for which he is a specialist; 4. Each expert group includes an international expert, an employer expert and a student expert, all three in the cluster program area; 	
42	<p>Page 44-45 of the ENQA commission report:</p> <p>The panel recommends considering a similar approach for EEG reports prepared for individual curricula. Since there are significant overlaps between reports on curricula within the same field of study, including different levels of the same specialty, we recommend exploring the possibility of addressing curricula of different levels of the same specialty in a single evaluation report (e.g., Sociology BA, Sociology MA, Sociology PhD)</p>	<p>Indeed, in accordance with paragraph 2.3 of the Guidelines for the Organization of External Audit, when preparing a self-assessment report, it is permitted to prepare one self-assessment report for the same-name programs of two levels (bachelor's and master's degrees). A separate self-assessment report is prepared for doctoral programs, since the accreditation standards for doctoral programs differ significantly from the accreditation standards for bachelor's and master's programs.</p>	

		<p>However, when preparing the EEG reports for a more qualitative, objective assessment, maximum consideration of the features of the program content, the resource base, which is significantly different for the master's degree from that needed for the bachelor's degree, a greater focus on deepening the research component, the potential of the teaching staff for the master's degree, the IKCA requires experts to prepare EEG reports separately for each program. Otherwise, in fact, a certain "saving" of effort and resources when preparing a combined EEG report will in fact significantly reduce the quality of the analysis and assessment of the specific features of different levels of the same-name programs identified above. In practice, studying the experience of other agencies, for example, the Independent Agency for Accreditation and Rating (IAAR), the ASIIN agency, using such a practice, we saw serious shortcomings of these combined reports: cumbersomeness (large volume of texts), the presence of repetitions, the lack of the necessary depth of analysis and assessment of programs of each level according to all criteria of the standards.</p> <p>Therefore, we will continue the practice of writing separate ESG reports for each accredited program, which does not contradict ESG standards.</p>	
43	<p>Page 45 of the ENQA commission report:</p> <p>Based on the past ENQA recommendation, the panel wanted to evaluate whether the Expert Councils participate in the consultation and improvement processes within IKCA. From the interview with the Expert Council members, it was confirmed that they have a role in updating</p>	<p>In response to this comment, we inform you that no new standards were adopted in 2023, except for the standards for accreditation of pedagogical educational organizations and their programs. Thus, standards for institutional accreditation of higher and postgraduate education organizations</p>	<p>2 copies of the Minutes of the meetings of the Expert Council on Pedagogical Education</p>

	<p>IKCA's standards and guidelines, but even in this case, they could not describe clear procedures to do so. However, the panel noted that the organizational consultants (Convention of Youth of Kazakhstan, Republican association of private educational organizations) were asked to provide their feedback only after the new standards were adopted in late 2023. More specifically, the Convention of Youth of Kazakhstan was contacted via letter (sent by IKCA director) in January 2024, while the Republican association of private educational organizations was contacted in March 2024. Therefore, the stakeholders did not actively participate in the consultation process on the adoption of the standards and guidelines, but were rather requested to provide feedback on the already adopted documents.</p>	<p>pedagogical education based on ESG-2015, approved by the order of the NKCA No. 25-nk dated 02/23/2023. To develop and approve these standards, interested parties, specialists in pedagogical education were involved, they were reviewed and approved by the Expert Council on Pedagogical Education. We present the evidence once again:</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. <p>At this meeting, the members of the expert council were presented with the professional standard "Teacher" and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p> <p>At the next meeting No. 2 on March 3, 2023, a discussion took place at a meeting of the Expert Council on Pedagogical Education of the standards for institutional and programmatic accreditation of pedagogical education developed with the participation of stakeholders.</p> <p>All current IKCA Standards were issued back in 2021, during the preparation for the first external audit of the ENQA commission, and intellectual property certificates were received for them (authors-developers Adilgazinov G.Z., Khalmuratov B.O.).</p>	
--	--	---	--

		<p>In 2023, during the preparation for the second external audit, all Standards and Guidelines were partially updated and re-approved. These not new, but updated standards received feedback from stakeholders (Conventyouth of Kazakhstan, Republican Association of Private Educational Organizations).</p> <p>We emphasize: the new Accreditation Standards for pedagogical education organizations were developed with the active participation of external stakeholders, as proven above. Also, any new Accreditation Standards will be developed with the participation of external specialists in the field that will be accredited.</p>	
	<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on information available up to the end of the evaluation visit.....”, based on the above arguments of the IKCA on each of the comments, which generally indicate the invalidity of individual comments, the correction of other comments before the end of the evaluation visit by the ENQA committee, the IKCA management requests revise the ESG 2.2 DEVELOPMENT OF FIT-FOR-PURPOSE METHODOLOGIES committee's assessment from “partial compliance” to “complies.”</p>		

2. ESG STANDARD 2.5 – CRITERIA FOR OUTCOMES

Paragraph 21 of the EQAR Registration Committee’s Decision states that:

“In its decision to refuse IKCA’s registration dated 12 December 2023, the Registration Committee found IKCA to be non-compliant with the standard due to the lack of consistent use of predefined assessment levels, incomplete coverage of criteria in reports, and the absence of thorough analysis and evidence supporting the conclusions.”

Paragraph 22 further states that the ENQA review panel established that IKCA reports still did not systematically apply predefined assessment categories, did not address all IKCA criteria, and often lacked sufficient analysis and evidence to substantiate conclusions regarding the level of compliance.

IKCA disagreed with this assessment, as it is not appropriate to draw such far-reaching conclusions based on six individual reports (three institutional and three programme accreditations) out of more than 300 reports (i.e. 2% of the total number of reports). At the same time, in IKCA's **Additional Submission** under ESG Standard 2.5, we clearly state that these isolated technical errors were fully brought into compliance with IKCA guidelines, with the involvement of the heads of the relevant expert groups, prior to the targeted review conducted by ENQA experts. Importantly, this work on the reports did not change the substance or outcomes of the accreditation decisions adopted by the Accreditation Council.

In paragraph 24, the Registration Committee notes the significant improvements made by IKCA prior to the start of the visit and, in part, before the completion of the ENQA targeted review visit: additional tools were introduced to ensure consistency in the application of criteria and decision-making; specific reports containing errors were corrected; expert training was organised; and IKCA's guiding documents were revised to ensure proper use of predefined assessment levels.

Our disagreement with the low assessment under this standard is based on the fact that the ENQA review panel itself states in its report:

“As the panel bases its assessments on the information available up to the end of the review visit...”

This indicates that IKCA had the opportunity to introduce certain changes up until the end of the review visit, which we indeed did.

The above fully complies with paragraph 6.4 of the ENQA Guidelines for Agency Reviews, which states:

“All necessary information should be provided to the review panel before or during the site visit.”

We interpret this provision as being binding both for the agency and for the ENQA review panel.

Therefore, we consider that this core ENQA regulatory document governing external reviews provides grounds for IKCA to submit its documents, with partial amendments, prior to and during the audit process.

The application for the targeted review was accepted by EQAR on 29 April 2024. In accordance with the ENQA Guidelines for Agency Reviews, the review panel appears to have examined the agency's External Review Group (ERG) reports starting from the confirmation of IKCA's application. The main remarks by ENQA experts regarding IKCA's ERG reports were made in April, June, and July 2024. In preparation for the targeted review, and being aware from the 2023 external review report of typical shortcomings in ERG reports, the staff of the Department of Methodology, Monitoring, and Quality Assurance, together with the heads of IKCA expert groups, undertook work to bring selected ERG reports into compliance with the approved IKCA format, without altering the basis or substance of the

accreditation decisions adopted by the Accreditation Council. These measures were implemented by IKCA prior to the arrival of the ENQA review panel. This fact is confirmed in the Registration Committee’s Decision.

With regard to paragraph 25 of the Registration Committee’s Decision, which states that “changes related to ensuring consistency require a certain period for implementation and demonstration of their impact...”, a reasonable question arises: Where is this period clearly defined, and what is its duration for implementation and demonstration of impact? IKCA has been actively engaged in the accreditation of higher education institutions and programmes since 2019. While isolated errors occurred, they were corrected in a timely manner in accordance with the **requirements of the ENQA Guidelines for Agency Reviews.**

IKCA also disagrees with the conclusion in paragraph 26 of the Registration Committee’s Decision that it is impossible to verify the existence of formal and systematic procedures ensuring consistency of reports and decisions.

These procedures are clearly and unequivocally set out in the IKCA document “Guidelines for Organising External Evaluation (Audit) within the Framework of Institutional (Specialised) Accreditation”, approved on 3 October 2023, i.e. prior to the first review visit of the ENQA review panel.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/240125/1.pdf>

Moreover, in paragraph 24, the Registration Committee itself acknowledges that IKCA has tools to ensure consistency in the application of criteria and decision-making, that specific reports containing errors were corrected, that expert training was organised, and that IKCA’s guiding documents were revised to ensure proper use of predefined assessment levels.

In addition, training of experts, IKCA staff, and members of IKCA Councils in all accreditation procedures is currently conducted on a systematic basis. As a result, the isolated shortcomings previously identified by the ENQA review panel in the reports of IKCA expert groups are being avoided.

Based on the above arguments of IKCA, as well as the comments on each of the remarks presented in our Additional Submission under ESG Standard 2.5 – Criteria for Outcomes, which overall demonstrate the lack of validity of certain remarks and the correction of others before the completion of the ENQA review visit, the IKCA management requests that the Appeals Committee recommend to the Registration Committee to change the assessment under ESG Standard 2.5 – Criteria for Outcomes from “non-compliant” to “partial compliance.”

	ESG 2.5 CRITERIA FOR OUTCOMES
--	--------------------------------------

44	<p>Page 46-47 of the ENQA commission report:</p> <p>The work of EEGs is described in the ‘Guidelines for the Organization and Conduct of an External Assessment (Audit) Within the Framework of Institutional and Specialized (Program) Accreditations, adopted on October 3rd 2023. In guidelines, point 12 states that experts evaluate the fulfillment of criteria on a four-point scale:</p> <ul style="list-style-type: none"> • ‘Strong’- indicates a high level of the indicator according to one criterion, which can serve as an example of positive practice for dissemination among other public organizations; • ‘Satisfactory’ - indicates the average level of the indicator according to one criterion; • ‘Suggests improvement’ - indicates a low level of the indicator according to one criterion; • ‘Unsatisfactory’ - indicates that this criterion of EO and/or EP does not meet the criterion. <p>Moreover, the report template included in the guidelines clearly states that the EEG provides evaluations for each criterion on a four-point scale (page 21): ‘EEG conclusions by criteria (strong/satisfactory/suggest improvement/unsatisfactory).’ In practice, however, most of the reports do not provide evaluations for individual criteria but rather for standards, and they do so, using mainly a threepoint scale: complies, complies with comments, does not comply.</p>	<p>Even during the preparation for the external audit of the ENQA expert commission, IKCA employees made the necessary changes to the Guidelines for the organization and conduct of external audits within the framework of institutional/specialized accreditation of educational organizations/educational programs; the subsection concerning the four-point assessment according to the criteria, which was previously (until 2022) used by experts in their individual records to derive the final assessment for each standard, was excluded. Therefore, in preparation for the second visit of the ENQA commission, changes were made to the assessment tables in individual EEG reports in the reports of external expert groups together with the heads of expert groups, namely, three-level assessments were introduced, according to which the results of accreditation within the framework of both institutional and specialized accreditation have been summed up since 2019. At the same time, such a technical adjustment did not change the basis and essence of the decisions on accreditation adopted by the Accreditation Council.</p>	<p>Guidelines for organizing and conducting external assessment (audit) within the framework of institutional and specialized (program) accreditation https://nkca.kz/storage/app/media/INKCA/Akkred/Rukovodstvo/240125/1.pdf</p>
45	<p>Page 47-48 of the ENQA commission report:</p> <p>There are other examples of programme assessment, where two different scales of compliance were used within the text of the report. In the EEG</p>	<p>The comments in the text of the expert commission's report on the accreditation deadlines for programs 7M01703 - Foreign Language: Two Foreign Languages of the Bolashak Kyzylorda University (June 2024), 8D01540 - Chemistry of</p>	<p>EEG report on EP 7M01703 – Foreign language: two foreign languages of Kyzylorda University</p>

<p>report on 'Foreign language: two foreign languages' programme at an institution accredited in June 2024, a three-scale assessment is used with similar meaning 'Complies; Complies with remarks; Does not comply'. Since the original language of the expert reports is either Kazakh or Russian, it is clear that the variations in the names of the three-point scale arise from the inconsistent use of terminology during translation. Based on the Russian-language reports, it can be stated that the same terms are consistently used for the three-point scale: 'Соответствует - Соответствует с замечаниями - Не соответствует' (Complies; Complies with comments; Does not comply). Therefore, the variations in the names of the three-point scale are due to a translation error. However, it is relevant to note that there were also cases of inconsistent assessment which did not originate from the translation errors. For example, if the assessment 'Соответствует с замечаниями' (eng. 'complies with comments') is included in the evaluation report, but the expert group still had the possibility to recommend the accreditation of the programme for three years (as occurred in the case of the afore referenced curriculum). However, almost no recommendations were provided by the EEG, and the proposal for the Accreditation Council was to accredit the programme for five years. In the report on the programme 'Chemistry' of the institution accredited in April 2024, the scale used by the panel is 'Compliant; Complies with recommendations; Does not match'. However, the report includes the proposal to the Accreditation Council to accredit the programme</p>	<p>the Kuatbekov Peoples' Friendship University (April 2024) concerned the fact that the Accreditation Council, when assessing all the standards as "compliant", made a decision to "accredit for 3 years". We would like to clarify that both of these programs underwent primary accreditation, which was clearly indicated on the title page of the EEG report. According to the rules for making decisions on primary accreditation in effect at that time, when assessing all the standards as "compliant" or when assessing 3 standards as "compliant with comments", the Accreditation Council had to make a decision to "accredit for 3 years", which was done for these two programs.</p> <p>This practice was used by the IKCA earlier, since the initial accreditation is usually carried out by programs that have not yet graduated, new programs for which there is no enrollment yet, but in order to enroll for training under a state educational grant, accreditation is needed, that is, programs for which it is impossible to give a full assessment according to all criteria of all standards are accredited. Therefore, in contrast to full accreditation, for initial accreditation, even in the absence of comments on the standards, accreditation was given for a reduced period of 3 years. In accordance with the Regulation on post-accreditation monitoring, after 1.5 years the IKCA could receive a report on the implementation of its recommendations and improvements in the program.</p> <p>However, taking into account the experience of other Kazakhstani agencies, proposals of the members of the IKCA Accreditation Council, recommendations of our colleagues - partners from the QAA agency, during the work of the commission, the department of methodology, monitoring and quality assurance made changes to the relevant documents</p>	<p>"Bolashak" (June 2024), https://nkca.kz/storage/app/media/INKCA/UZ/2024/KyzylordaBolashak/Otchet/1/7M01703eng.pdf EEG report on OP8D01540 – Chemistry of Peoples' Friendship University named after Kuatbekov (April 2024) https://nkca.kz/storage/app/media/INKCA/UZ/2024/Kuatbekova/%D0%9E%D1%82%D1%87%D0%B5%D1%82/Otchet/8D01540en.pdf</p>
---	--	--

	<p>for three years, even though, in the conclusion part of the report, all standards are marked as 'Compliant' with 'no comments'.</p> <p>This decision could be consistent with IKCA's standards for programme accreditation in higher education, in case of initial programme evaluation. However, all other programmes evaluated at the same HEI during the same period (and with full compliance for all standards), were accredited for five years, with no (known) previous accreditation by IKCA. According to the regulation on the Accreditation Council, in a case of full compliance for any accreditation except the initial one, a five-year accreditation should be granted. The EEG has not justified its proposal provided in the report. The Accreditation Council considered the committee's proposal and decided to accredit the study program for three years without providing any justification for its decision.</p>	<p>(Accreditation Standards, Guidelines for organizing and conducting an external visit, Regulations on the Accreditation Council), so that in the case of primary accreditation, if there are assessments for all standards "Complies" or up to 3 standards with the assessment "Complies with comments", accredit the EP for a period of 5 years. With the condition of annually submitting to the IKCA interim reports on the implementation of the IKCA recommendations, on improvements in the program.</p> <p>Likewise, accredit to 3 years in case of primary accreditation, if the decision is "Compliant with comments" for 4 standards;</p> <p>- accredit for 1 year in case of initial accreditation, if the decision is "Compliant with comments" for 5 or more standards.</p>	
46	<p>Page 48 of the ENQA commission report:</p> <p>In the report on the program 'Applied computer science in design' of the institution accredited in June 2024, three standards (2, 3 and 5) were marked as 'consistent with comments', however there are no comments (nor recommendations) under standard 3. Student-centered learning, teaching and assessment. In standard 2. Development and approval of an educational program, the EEG provided two recommendations ('Continue work on annual updating of the educational programme with the publication of all changes made on the university</p>	<p>It was a technical error, but it was corrected before the commission arrived. However, these corrections did not change the essence of the decisions on accreditation made by the Accreditation Council.</p>	<p>Report of the EEG on EP 6B06101 - Applied Informatics in Design" of Atyrau University named after Kh. Dosmukhamedov (accreditation in June 2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/VUZ/2024/AtyrauUni</p>

	<p>website; Consider opportunity development joint educational programs with universities near and far abroad.), but no comments (as non-compliance with one or more criteria'). The panel could not find the evidence on the clear differentiation between the 'recommendations' and 'comments' provided by the EEGs (in the accreditation reports) across IKCA's documents.</p>		<p>versityDosmykhamedova/Otchet/1/6B01601en.pdf</p>
47	<p>Page 48 of the ENQA commission report:</p> <p>According to the guidelines for experts, the EEG should form a proposal on accreditation for the Accreditation Council. The proposal was included in some reports (eg. the report on institutional accreditation of the Institution B), but the majority of the reports the review panel studied, did not include any such suggestion.</p>	<p>In all EEG reports for 2023 and the following years, at the end of Chapter 3 - "Conclusion" there are mandatory EEG Recommendations to the Accreditation Council for making a decision based on the results of accreditation. An additional check was carried out by the Department of Methodology, Monitoring and Quality Assurance to eliminate the shortcoming indicated in the remark in individual EEG reports.</p>	
48	<p>Old 49 of the ENQA commission report:</p> <p>The regulations of the Accreditation Council do not provide possibility for exceptions. However, the possibility of making exceptions is outlined, for example, in the standards for institutional accreditation (p 11): 'In exceptional cases, a decision of the Accreditation Council may determine a different accreditation period'. The general standards for institutional accreditation do not include clarification on exceptional cases. In the 'Standards for institutional accreditation of organizations of higher and postgraduate pedagogical education based on the ESG-2015', the Accreditation Council may</p>	<p>Regarding the expert commission's comment on the presence in the standards for accreditation of teacher education programs in the decision-making rules of a clause on making decisions by the Accreditation Council "in exceptional cases," we note that this does not contradict either the ESG standards or the normative documents of national legislation in education, but is dictated by the actual practice of accreditation, in which situations sometimes arise that cannot be foreseen in even the most sophisticated rules.</p> <p>By the way, in the practice of the Accreditation Council in the period of 2023 and subsequent years, there were no decisions taken in supposedly exceptional cases; the</p>	<p>Standards of institutional accreditation of pedagogical higher education institutions https://nkca.kz/en/standarty</p>

	<p>define a different accreditation period based on specific examples of exceptional cases, listed below:</p> <ul style="list-style-type: none"> a) Individual points from articles of legislation in the field of education and science. b) Individual paragraphs of the Model Rules for the activities of educational organizations of the relevant type. c) Certain provisions of the State Educational Standard. d) Individual points of qualification requirements for licensing educational activities. e) Individual paragraphs of orders of the authorized body for core activities. f) Numerous violations of the Standard of Academic Integrity by teaching staff, employees or students. 	<p>expert commission itself notes that decisions were taken in strict accordance with the terms approved in the Standards, the Regulation on the Accreditation Council, i.e. for 7 years, for 5 years, for 3 years and for 1 year.</p> <p>The remark in paragraph 11 on the adoption of other accreditation periods in exceptional cases has been excluded from the Standard for Institutional Accreditation of Pedagogical Higher Professional Education Institutions; there has never been such a clause in other standards.</p> <p>In this regard, we believe that this remark is unfounded.</p>	
49	<p>Page 49 of the ENQA commission report:</p> <p>The Accreditation Council's decisions are published on the agency's website in the format of a letter sent to the higher education institution. The letter includes the name of the institution, the type(s) of accreditation, and a list of accredited curricula. The list is structured based on the accreditation periods of the curricula. The letters do not contain justifications for the accreditation decisions but only refer to the obligation to submit an "action plan" by a specified deadline and to undergo "post-accreditation."</p>	<p>The criteria for making decisions on accreditation by the Accreditation Council are contained in Section 6 - "Decision-making by the Accreditation Council" of the Standards of Institutional and Specialized Accreditation. These standards are sent to universities in advance for writing self-assessment reports, while paying attention to these decision-making criteria. That is, universities know about these decision-making criteria in advance. Along with letters on the decisions made by the Accreditation Council on accreditation, the universities are sent reports of the EEG, discussed by the members of the Accreditation Council, with an approved assessment table for accreditation standards, which is the basis for making the decision on accreditation. These EEG reports with comments (if any) and recommendations are posted on the IKCA website. Therefore, the IKCA does not send special justifications for accreditation decisions to universities. In the event that a university files an application expressing disagreement with the decision taken by the Accreditation</p>	<p>IKCA Accreditation Standards https://nkca.kz/en/standarty</p>

		<p>Council, the IKCA sends a detailed justification for the decision to the appeals committee.</p>	
50	<p>Page 50 of the ENQA commission report:</p> <p>Therefore, it can be concluded that the key to ensuring consistency in accreditation decisions lies in the hands of the EEGs. However, the panel identified a significant mismatch between the guidelines for EEGs and their practical implementation in reports (as shown in the part of evidence), indicating that the use of this key is at times random or even arbitrary. This finding is consistent with the 2022 ENQA full review of IKCA. An application of different or multiple scales of compliance within and across the reports, the occasional absence of accreditation proposals by the EEG to the Accreditation Council, insufficient or missing analysis in several cases, instances of word-for-word copied text in the reports (from the standards), and confusion surrounding terminology (e.g., ‘comments’ and ‘recommendations’) are of particular concern. Especially concerning is the fact that ‘comments’, which were supposed to indicate non-compliance with a criterion, lacked references to the relevant criterion and did not include justification for such decisions.</p>	<p>Even before the ENQA expert commission began its work, the IKCA carried out operational work to check and partially correct the EEG reports for 2023 and 2024, with the involvement of the heads of the expert groups who prepared these reports for consideration at the meetings of the IKCA Accreditation Council. Here we relied on what the expert commission wrote in its report: “Since the commission bases its assessments on information available until the end of the assessment visit.....”</p> <p>Based on the same position of the expert commission, already during the assessment visit we made a number of changes and additions to our internal documents in order to achieve the “consistency” mentioned by the expert commission between the Accreditation Standards, Guidelines and actions taken on their basis.</p> <p>To do this:</p> <p>2.1 The Guidelines for the Organization and Conduct of External Evaluation exclude four levels of evaluation based on the criteria of the standards that are not used in the work of experts: “Strong”, “Satisfactory”, “Suggests improvement”, “Unsatisfactory”.</p> <p>All documents regulating accreditation procedures (Standards, Guidelines for the Organization and Conduct of External Assessment, Regulations on the Accreditation Council, etc.) place a clear emphasis on a three-level assessment</p>	<p>Guidelines for organizing and conducting external assessment (audit) within the framework of institutional and specialized (program) accreditation</p> <p>https://nkca.kz/storage/app/media/INKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

		of the criteria of the standards: “Complies”, “Complies with comments” and “Does not comply”.	
51	<p>Page 50 of the ENQA commission report:</p> <p>The panel received many examples of training materials, and deemed them very useful for the experts, as the training encompasses the introduction to the ESGs and to IKCA’s structure and standards. The training materials are undoubtedly relevant, guiding experts to analyze the fulfillment of criteria and justify their assessment. Unfortunately, these principles have not been consistently implemented in all reports. As already mentioned under ESG standard 3.6, the agency must carefully consider and implement quality assurance mechanisms for EEG reports to assure the consistency of outcomes. The panel found the use of terms ‘recommendations’ and ‘comments’ confusing, as their purpose and distinction between each other was not clear in the reports. During the interview, members of the Accreditation Council mentioned that, according to them, comments are mandatory improvement requirements, while the recommendations are suggestions. However, the panel found out from IKCA’s senior management team, that in the post-accreditation monitoring procedure, the Department of methodology, monitoring and quality assurance checks institutions’ improvements performed based on both the comments and recommendations to determine compliance. The panel found particularly concerning that none of the experts, excluding the international experts, were able to distinguish between the terms ‘recommendations’ and ‘comments’.</p>	<p>The audit program did not include a separate panel interview with a sufficient number of experts from the IKCA database, other than the student experts and two international experts, so the remark that none of the experts could distinguish between the terms “comment” and “recommendation” is unfounded. (See Audit Program).</p> <p>The IKCA management, the department of methodology, monitoring and quality assurance conducted training seminars for all categories of participants in the accreditation procedures: members of all Councils (Supervisory, Accreditation, Expert Councils, Appeals and Complaints Commission), IKCA employees, regional offices, experts from the IKCA database and new experts on additional clarification of the essence of the criteria of all accreditation standards, standards and guidelines for quality assurance of higher education in the EHEA (ESG), the procedure for preparing self-assessment reports, external visit (audit) procedures, the structure of the EEG report, the essence of the concepts of "Remark" and "Recommendation" in assessing standards, templates for writing EEG reports were presented.</p> <p>The essence and difference between the concepts of “comment” and “recommendation” are further explained in the Guide to Organizing External Audit.</p> <p>At each training seminar before the experts go on an external audit, at the first meeting with the experts before the immediate start of the audit, the experts’ attention is focused on the essence of the concepts “comment” and “recommendation”.</p>	<p>External Audit Programme of the ENQA Expert Committee</p> <p>Item 12.2 on page 12 of the Guidelines for the Organization and Conduct of External Assessment (Audit) within the Framework of Institutional and Specialized (Programme) Accreditation</p> <p>https://nkca.kz/storage/app/media/INKCA/Akkred/Rukovodstvo/240125/1.pdf</p>

52	<p>Page 50 of the ENQA commission report:</p> <p>The panel also noted that, at times, the text from the criteria of the IKCA standards is identical to the one in the EEG reports. One such example is the text of criterion 1.11, from the ‘Standards for specialized (program) accreditation of higher education and postgraduate education based on ESG-2015’, which is identical to the wording under 1.11 in the EEG’s report on the accreditation of the programme ‘International relations in the context of globalization’ at one of the accredited institutions. Another example of a similar approach is present in the report on programme “Computer Science” of an institution accredited in October 2023, where some of the criteria in almost all standards are repeating the wording of the criteria set in the standards for programme accreditation. There are more cases of word-for-word matches (see also examples provided under ESG 2.1) in other reports, leading to the lack of EEG’s addressing the criteria in an analytical and evidence-based way. Moreover, the fact that several criteria in many reports have essentially been left unassessed undermines the credibility and transparency of the accreditation process and ultimately leads to ‘inconsistency of outcomes’.</p>	<p>During the preparation for the external audit of the ENQA commission and after the audit, all reports were checked for the quality of the analysis and assessment according to all criteria of all accreditation standards. Corrections were made with the participation of the heads of the EEG to the reports noted in the report of the ENQA expert commission. These adjustments did not alter the basis and essence of the decisions made by the Accreditation Council regarding the accreditation of universities or programs.</p> <p>Currently, when receiving EEG reports before sending them to members of the Accreditation Council, the employees of the Department of Methodology, Monitoring and Quality Assurance, in accordance with a specially prepared memo, check all EEG reports in detail: whether there is an analysis and assessment for all criteria of each standard, whether the analysis and assessment correspond to the topic of the criterion, how original are the EEG reports for different programs, etc.</p>	<p>Report of the EEG on EP 6B03101 - International Relations in the Context of Globalization (Abai Kazakh National Pedagogical University) May 2023 https://nkca.kz/storage/app/media/1NKCA/UZ/2023/AbayUniver/en/1/6%D0%9203101en.pdf</p> <p>EEG report on EP 6B06106 - Computer Science (Central Asian Innovation University) October 2023 https://nkca.kz/storage/app/media/1NKCA/UZ/2023/CentrAsiaUniver/6%D0%9206106en.pdf</p>
53	<p>Page 51 of the ENQA commission report:</p> <p>If a decision is made, by the Accreditation Council, to accredit HEIs for seven years, examples of broadcasting best practices should be provided, according to IKCA’s standards. However, the panel</p>	<p>In all reports on programs accredited for 7 years at the Kazakh National Pedagogical University named after Abai (December 2023) (5 EP) and at Kokshetau University named after Abai Myrzakhmetov (6 EP) (April 2024), for each standard there is a section "Good Practice", which indicates examples of</p>	<p>EEG reports on 5 EP of the Kazakh National Pedagogical University named</p>

	<p>was unable to find any examples of those best practices in cases of seven-year accreditation. Some examples of the decisions missing this information include the ones on the accreditation of programmes at an institution accredited in December 2023, and at the institution accredited in April 2024. The panel wishes to highlight that some good practices identified during the programmatic or institutional accreditation by the EEG are mentioned in the EEG reports.</p>	<p>best practice, and for KazNPU named after Abai, these best practices are indicated again in Chapter 3. Conclusion. Therefore, this serious remark on making decisions on accreditation for 7 years in the absence of best practices is incorrect!</p> <p>The IKCA has developed a Methodological Instruction for experts, explaining the criteria for identifying Advanced Pedagogical Experience.</p>	<p>after Abai (December 2023) https://nkca.kz/storage/app/media/1NKCA/UZ/2023/Abay/reshEN.pdf , https://nkca.kz/storage/app/media/1NKCA/UZ2NEW/AbayUniversity2023/6%D0%9202118en.pdf HSE reports on 6 EP of Kokshetau University named after Abay Myrzakhmetov (April 2024) https://nkca.kz/storage/app/media/1NKCA/UZ/2024/AbayMyrzakhmetovKokshetauUniversity/Resheniye/resHEN%20abaiM.pdf https://nkca.kz/storage/app/media/1NKCA/UZ/2024/AbayMyrzakhmetovKokshetauUn</p>
--	--	--	---

Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on information available by the end of the assessment visit...”, based on the above arguments of the IKCA for each of the comments, which generally indicate the invalidity of individual comments, taking into account the work carried out by the IKCA during the external audit of the ENQA committee to correct individual reports, individual internal documents of the IKCA by the end of the visit, we ask to change the assessment according to the ESG 2.5 CRITERIA FOR OUTCOMES standard from the assessment of “not compliant” to the assessment of “partial compliance”

3. ESG STANDARD 3.3 – INDEPENDENCE

With regard to paragraph 28 of the Registration Committee’s Decision, IKCA expresses its full disagreement with the remark stating that:

“...there remains a lack of transparency and clarity in the procedures for appointing key bodies. In particular, the role and structure of the Working Group, the key collegial body responsible for selecting members of other IKCA bodies, are insufficiently clear and regulated.”

Prior to the start of the ENQA expert panel’s targeted review in November 2024, and in order to eliminate “...concerns regarding the influence of the founder and the lack of safeguards ensuring the organisational and operational independence of the agency,” as noted in paragraph 27 of the EQAR Committee’s Decision, IKCA developed an internal regulatory document entitled:

“Regulations on the Working Group for the Determination and Approval of the Composition of the Accreditation Council, Supervisory Board, Appeals and Complaints Committee, Expert Councils of the Non-Profit Institution ‘Independent Kazakhstani Center for Accreditation’, as well as for the Engagement and Selection of Stakeholders.”

This document formally institutionalised the Working Group that has been operating within IKCA since 2023, responsible for determining and approving the composition of all IKCA councils and committees.

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/ORaboGroup/Polozhenierabgren.pdf>

This Regulation contains an Annex entitled “Procedure for Engaging Independent Representatives and Stakeholders (state bodies and/or non-governmental, public organisations and/or educational organisations, associations, employers) in the Working Group of the Non-Profit Institution ‘IKCA’.”

This Regulation, together with the Annex, provides a clear and unambiguous basis for understanding the role of the Working Group, its structure, and its functions in ensuring transparency and clarity in the appointment of members of IKCA councils and of the Working Group itself. In particular, the Regulation on the IKCA Working Group (hereinafter – the WG) includes the following sections:

Chapter 1 – General Provisions;

Chapter 2 – Objectives of the WG;

Chapter 3 – Functions of the WG;

Chapter 4 – Procedure for the Formation and Operating Principles of the WG;

Chapter 5 – Termination of the WG’s Activities;

as well as the above-mentioned Annex.

IKCA does not agree with the position of the Registration Committee, noted by us in paragraph 29, that:

“The Committee also noted that the revised rules merely describe the current composition of the Working Group, rather than specifying concrete profiles and the organisations nominating candidates.”

In the Regulation on the Working Group, paragraph 6 of Chapter 4 (Procedure for the Formation and Operating Principles of the Working Group) establishes that the composition of the Working Group is formed

“...from among representatives of relevant structural units of the Non-Profit Institution ‘IKCA’, with the exception of the Director of IKCA, as well as independent stakeholder representatives (state bodies and/or non-governmental, public organisations and/or educational organisations, associations, employers), engaged in accordance with the ‘Procedure for Engaging Independent Representatives and Stakeholders ... in the Working Group of IKCA’ set out in the Annex to this Regulation. Independent representatives and stakeholders must constitute no less than 51% of the total membership of the Working Group. The Working Group must consist of an odd number of members and include no fewer than five persons.”

Formal letters inviting nominations were sent to the state bodies, non-governmental and public organisations, educational institutions, associations, and employers specified in the Regulation and its Annex.

As a result, nominations were received and, in full compliance with the Regulation on the Working Group, its composition was formed, in which independent representatives of the above-mentioned organisations are present and constitute the majority.

In the IKCA **Additional Submission** dated 09 September 2025, evidentiary comments demonstrating the lack of validity of each remark made by the ENQA expert panel were provided. In particular, in response to the remark that:

“No evidence was found regarding the criteria for the appointment/election of the IKCA Director by the agency’s founder,”

the Additional Submission includes the official job description of the IKCA Director, approved on 12 December 2021, which clearly defines the criteria for appointment and the qualification requirements for the position of IKCA Director.

Accordingly, IKCA expresses its disagreement with the conclusion of the Registration Committee contained in paragraph 31 of the Decision, which states that:

“...however, the Committee also found that IKCA was unable to demonstrate that the issues identified in the previous registration decision of 2023 regarding the organisational and operational independence of the agency had been resolved.”

Based on the arguments presented above, as well as on our comments provided in the Additional Submission addressing each remark of the ENQA expert panel and demonstrating their lack of validity, the IKCA management requests that the Appeals Committee recommend to the Registration Committee to change the assessment under ESG Standard 3.3 – Independence from “partial compliance” to “complies.”

ESG STANDARD 3.3 INDEPENDENCE			
6	Page 18 of the ENQA commission report: No evidence was found regarding the criteria for the appointment/election of the IKCA Director by the agency's founder.	The IKCA Charter was developed and approved in strict accordance with the legislation of the Republic of Kazakhstan. Thus, in accordance with the order Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 The Standard Charter form for legal entities has been established. The Standard Charter form does not provide for the procedure for dismissal or appointment of the company director, it only states that the director is appointed by the founder and is elected or dismissed in accordance with the requirements of the current labor legislation of the Republic of Kazakhstan. The criteria for the position of director are contained in the job description of the director of the IKCA. Conclusion of the IKCA:	IKCA Charter, https://nkca.kz/storage/app/media/1NKCA/O Centre/Ustav/2/Ustav En.pdf

		<p>Thus, the conditions for the appointment and dismissal of the director are a priori provided for by the norms of the Labor Code of the Republic of Kazakhstan and no additional regulation is required.</p>	<p>Order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 "On approval of model charters of legal entities related to small, medium and large businesses"</p> <p>https://adilet.zan.kz/rus/docs/V1500010563</p> <p>Job description of the Director of the IKCA</p>
7	<p>Page 19 of the ENQA commission report: IKCA also provides the opportunity for experts to apply online as a national expert, international expert, employer expert or student expert (all in the field of higher education), but the commission has not heard of any cases where an online application has been considered for inclusion in the roster of experts, and has not encountered any experts (student, international expert or university staff) who have applied using this procedure.</p>	<p>In our opinion, such a conclusion of the commission about the absence of experts with an online application is incorrect, since there was no separate interview with a large number of experts from the IKCA database, except for student experts and two international experts!!! (see the External Visit Program). However, on the IKCA website we have provided the opportunity for online applications for inclusion in the IKCA expert database to any person who meets our requirements. Here are several examples of how future experts took advantage of this opportunity, submitted online</p>	<p>Programme of the external visit of the ENQA commission. Copies of online applications from 3 people</p>

		applications, and were thus included in the IKCA expert database.	
8	Page 19 of the ENQA commission report: One of the most significant changes for the agency was the transition from an organizational founder to an individual in September 2023. However, the agency mentioned that this transition did not affect the organizational activities as the agency continued to use the same offices and continued to function in the same capacity after the transition.	The most important thing is that complete independence in decision-making on accreditation is ensured from the Founder, the Director of IKCA, and other third parties.	
9	Page 19 of the ENQA commission report: However, the commission noted some procedural inconsistencies that should be addressed. Based on the Articles of Association, Article 3, paragraph 3, the founder has the right to determine the competencies, organizational structure and the procedure for the formation and termination of the powers of the director of IKCA. During this review, no evidence was collected regarding formalized procedures for determining the criteria for the appointment or election of the director of IKCA or the termination of their powers.	The Charter of the IKCA was developed and approved in strict accordance with the legislation of the Republic of Kazakhstan. Thus, in accordance with the order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106, a standard form of the charter for legal entities was established. The standard form of the Charter does not provide for the procedure for dismissal or appointment of the director of the company, it only states that the director is appointed by the founder and is elected or dismissed in accordance with the requirements of the current labor legislation of the Republic of Kazakhstan. However, in the job description of the director, approved on December 25, 2021, in paragraph 2.1 of section 2 “Qualification requirements”, the criteria for the appointment of the director of the IKCA are given. In full compliance with them, the selection and appointment of the director of the IKCA is carried out on a competitive basis.	IKCA Charter, https://nkca.kz/storage/app/media/1/NKCA/OCentre/Ustav/2/UstavEn.pdf Order of the Minister of Justice of the Republic of Kazakhstan dated February 24, 2015 No. 106 "On approval of model charters of legal entities related to small, medium and large businesses" https://adilet.zan.kz/rus/docs/V1500010563

10	<p>Page 20 of the ENQA commission report:</p> <p>There are currently eight members of the IKCA Working Group, five of whom are IKCA staff and three of whom are external experts. The team found that three of the external experts had recently been added to the Working Group and therefore had not had the opportunity to actively participate in its activities at the time of the site visit.</p>	<p>At the time of completion of the ENQA expert commission's work, the working group consisted of 11 people, 6 of whom were independent involved stakeholders.</p> <p>As an example of interaction within the framework of attracting stakeholders, we are sending requests from NI «IKCA" and responses from the Kostanay Engineering and Economics University named after M. Dulatov, as well as the Kazakh Automobile and Road Institute named after L.B. Goncharov. The candidates are absolutely independent and are disinterested persons. Based on the results of requests from NI «IKCA", representatives of the following organizations were involved as members of the working group:</p> <ul style="list-style-type: none"> - National Chamber of Entrepreneurs Atameken (Deputy Director of the Department); - Kostanay Engineering and Economics University named after M. Dulatov (President); - Kazakh Automobile and Road Institute named after L.B. Goncharov (professor); - Medical University of Karaganda (student); - Institute of Radio Electronics and Information Technology of the Ural Federal University of the Russian Federation (professor); - Astana International University (Director). <p>The working group consists of 11 people, 6 of whom are independent involved stakeholders.</p>	<p>IKCA requests with letters to various organizations, for example, responses from the Kostanay Engineering and Economics University named after M. Dulatov, Kazakh Automobile and Road Institute named after L.B. Goncharov</p>
11	<p>Page 21 of the ENQA commission report:</p> <p>Furthermore, the structure and members of the Working Group are not shown anywhere on the IKCA web pages, resulting in a lack of transparency in public information.</p>	<p>The NI «IKCA" has posted the Regulation on the Working Group in its current version on its corporate website. This document fully reflects the principles and format of the Working Group's activities and is freely available without any restrictions for viewing and familiarization by any interested person.</p>	<p>Regulations on the IKCA Working Group https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/ORa</p>

		<p>Since the members of the Working Group have a great responsibility for the selection and approval of members of important Councils, in order to exclude the risks of external stakeholders influencing the members of the Working Group, considering this information confidential, information about the members of the Working Group is not posted on the website.</p> <p>It should be noted that NI «IKCA» constantly updates and fills its corporate website www.nkca.kz. A comparative analysis of the websites of Kazakhstani accreditation agencies showed that the percentage of filling and detailing of documents of NI «IKCA» is significantly higher than the volume of information posted by other accreditation agencies. For example, NI «IKCA» posts full documents (in particular, constituent documents), while the agencies NAAR, NAOKO, ARKA post only excerpts from documents.</p> <p>A legitimate question arises: «Where is the transparency in the activities of these respected agencies, which were accepted into ENQA and EQAR without any problems?»</p>	boGroup/Polozheniera bgren.pdf
12	<p>Page 21 of the ENQA commission report: The agency informed the commission that the Working Group now consists of 11 members, six of whom are independent stakeholders. The Deputy Director remains a member of the Working Group. The commission emphasizes the fact that this amendment was made after the site visit and the commission was not notified either before or during the accreditation process that such a change would be implemented by the agency so soon.</p>	<p>The said planned amendment was reported to the IKCA during the audit. This amendment was made before the end of the audit. In this part, we rely on what the expert commission writes in its report: “Since the commission bases its assessments on information available up to the end of the assessment visit.....”, therefore, we cite in the text, among our arguments, individual changes in the IKCA documents, procedures, which were made during the commission’s audit, i.e. up to the end of the assessment visit.</p>	Order on changes in the composition of the Working Group
13	<p>Page 21 of the ENQA commission report: The Panel considered the Deputy Director's participation in the Working Group to be a</p>	<p>The risk of a conflict of interest, including that of the executive management and the founder, is excluded. The powers of the director and the founder are limited to the maximum extent by the</p>	Order on changes in the composition of the Working Group.

	<p>conflict of interest, since a member of the IKCA management team heads a body that should be independent of it. The Working Group's regulations state the following: "The composition of the Working Group is approved by order of the Director of NI 'IKCA' or the person replacing him, while the Director has no right to interfere and/or influence the activities of the Working Group. The Working Group is an independent collegial body." Thus, the Deputy Director of IKCA has the authority both to approve the composition of the Working Group and to participate in its activities, which should not be the case.</p>	<p>NI «IKCA» (amendments were made to the company's charter based on the results of the first visit of the ENQA expert commission):</p> <ul style="list-style-type: none"> - the director is not included in the composition of collegial bodies; - the composition of the collegial bodies is formed and approved by the Working Group and provided to the Founder for review; previously, this functionality was within the competence of the Founder. <p>The powers of the director within the framework of accreditation activities are maximally limited, he has no right to interfere in the activities of the company's bodies. In addition, the director does not interact with the Founder within the framework of parallel business processes. In addition, in order to eliminate the risk of a conflict of interest, the IKCA developed and implemented a new document "Policy for the identification and resolution of conflicts of interest" before the start of the external audit, which regulates the procedure for identifying and resolving situations associated with the risk of a conflict of interest.</p> <p>Immediately after the external audit of the ENQA commission, the Deputy Director was removed from the Working Group and a re-election of the Chairman of the Working Group took place.</p>	
14	<p>Page 21 of the ENQA commission report: Since the current Working Group is composed mainly of Agency employees (five out of eight members), the decisions taken by this body cannot be considered an "independent collegial body" (Working Group Regulations, p. 2).</p>	<p>Even during the work of the external ENQA expert group, the composition of the Working Group was brought up to 11 people, of which 6 people are external, independent from the IKCA management, representatives of various organizations. Therefore, in our opinion, this is a truly independent body of the agency. The subsequent activity of the Working Group on updating the composition of the Accreditation Council after the external visit clearly showed us: how fundamentally, thoroughly, in a lively</p>	<p>Order on changes in the composition of the Working Group.</p>

		discussion the selection of new members of the Accreditation Council, important for the agency, was made by this composition of the Working Group from among possible candidates from state, non-state, public organizations.	
15	<p>Page 21 of the ENQA commission report:</p> <p>The panel found that the ‘Procedure for engaging experts to serve on the Accreditation Council, Supervisory Board, appeals and complaints committee, and Expert Councils, as well as for involving stakeholders in the development and updating of regulatory documents for the IKCA’ does not offer help in distinguishing among the candidates for IKCA’s governing bodies. The panel finds that the criteria described are very broad and it could complicate the decision process on the selection of members. It could be useful to broaden these criteria with beneficial requirements, which could help the Working Group of IKCA in easier selection of candidates according to more transparent criteria.</p>	<p>In preparation for the external visit of the ENQA commission, the document "Procedure for involving experts in the Accreditation Council, Supervisory Board, Appeals and Complaints Commission, Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" (approved on 10.10.2024) was approved, which described and approved the actual process of involving experts in various Councils and commissions of the IKCA, as well as stakeholders in the development of regulatory documents of the IKCA. In accordance with the recommendations of the ENQA commission, the criteria for the selection of experts and stakeholders were clarified, narrowed and specified; this internal document was re-approved on 13.11.2024.</p>	<p>"The procedure for involving experts in the Accreditation Council, the Supervisory Board, the Appeals and Complaints Commission, the Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" (approved on 10.10.2024)</p> <p>https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/PoryadokExpertEn.pdf</p>

16	<p>Page 22 of the ENQA commission report: IKCA does not have formalized procedures to prevent influence by other institutions or stakeholders on the final accreditation results.</p>	<p>This conclusion of the ENQA Commission is contradicted by the following two sentences from the ENQA Commission report on page 22.</p> <p>From the ENQA commission report:</p> <p>As the decisions on accreditation outcomes are taken directly by the Accreditation Council of IKCA, no external influences are present in the decision-making processes. Additionally, during the site visit, the panel did not receive any information on potential interference of external stakeholders on the accreditation processes. This process was rather seen as transparent democratic, and was appreciated by IKCA’s management and staff members, as well as by the stakeholders (HEIs, students).</p> <p>Let us emphasize: Mechanisms for preventing the influence of other institutions or interested parties on the final results of accreditation are approved in the Regulations on the Accreditation Council (paragraphs 2.2, 3.4, 4.3), the document “Policy for identifying and resolving conflicts of interest of the IKCA, approved on 01.10.2024, the Guide to internal quality assurance (approved on 03.10.2023 with amendments dated 13.11.2024) (section 3. External assessment experts), the Code of Honor of the IKCA expert.</p>	<ol style="list-style-type: none"> 1. Regulations on the Accreditation Council (paragraphs 2.2, 3.4, 4.3); https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/Akkred/PolozhAkkredSovEn.pdf 2. Document "Policy for identifying and resolving conflicts of interest of the IKCA”, approved on 01.10.2024; https://nkca.kz/storage/app/media/1NKCA/Akkred/Polozhenie/PolitikaInteresov/PolitikaInteresoven.pdf 3. Internal Quality Assurance Guidelines (approved on 03.10.2023 with amendments from 13.11.2024) (section 3. External assessment experts),
----	---	--	---

			https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovnutrqachen.pdf 4. Code of honor of the IKCA expert. https://nkca.kz/storage/app/media/1NKCA/Akkred/Expert/KodeksExpertEn.pdf
17	Page 22 of the ENQA commission report: Although a collegial body named the Working Group has been established within IKCA, which is granted decision-making authority in the selection of the Accreditation Council members, Supervisory Board, and Appeals and Complaints Committee, this is not an independent decision-making body composed of representatives from various stakeholders. Instead, it consists mainly of agency employees who are subordinate to the agency's director in their daily work.	We have already emphasized above that during the work of the external ENQA expert group, the composition of the Working Group was increased to 11 people, of which 6 people are external, independent from the IKCA management, representatives of various organizations.	Order on changes in the composition of the IKCA Working Group
18	Page 22 of the ENQA commission report: While the principles for forming the Accreditation Council and Supervisory Board are regulated, it remains unclear what criteria the Working Group uses to make its selection. The agency clarified the selection processes for the different bodies of IKCA, but there were still concerns from the panel	It was stated above that the internal document “Procedure for involving experts in the Accreditation Council, Supervisory Board, Appeals and Complaints Commission, Expert Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution “Independent Kazakhstani Center of Accreditation” (approved on 10.10.2024) described and approved the actual process of involving experts in various	Document "Procedure for involving experts in the Accreditation Council, Supervisory Board, Appeals and Complaints Review Commission, Expert

	that these processes are not defined within IKCA’s documents for all the bodies in its structure.	Councils and commissions of the IKCA, as well as interested parties in the development of regulatory documents of the IKCA; the Appendix very clearly sets out the criteria that are used by the Working Group to form the composition of each Council, Commission.	Councils, as well as stakeholders for the development and updating of regulatory documents of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" https://nkca.kz/storage/app/media/1NKCA/Akkred/Instruct/PoryadokExpertEn.pdf
<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on information available up to the end of the assessment visit...”, based on the above arguments of the IKCA on each of the comments, which generally indicate the invalidity of individual comments, the correction of other comments before the completion of the ENQA assessment visit by the committee, the IKCA management requests to change this Standard 3.3. ESG “Independence” from the assessment of “partial compliance” to the assessment of “complies”.</p>			

4. ESG STANDARD 3.4 – THEMATIC ANALYSIS

During the targeted review conducted by the ENQA expert panel in November 2024, IKCA’s work on integrating the development of thematic analyses into the IKCA Strategic Development Plan was positively assessed. **This enabled the ENQA expert panel to award the assessment “complies” for this standard.** It is evident that the ENQA expert panel made this assessment in full accordance with paragraph 2.3 of the ENQA Guidelines for Agency Reviews, which states that:

“...for example, completed thematic analysis reports may not be required if clear plans for carrying out such activities are presented during the review.”

Nevertheless, IKCA did present a number of completed thematic analyses.

On the IKCA website, under the “Documents” section, there is a subsection entitled “Publications”, where IKCA analytical materials related to thematic analyses have been published since 2022.

In particular, in **2022** one thematic analysis entitled “Independent Accreditation in Kazakhstan: Experience, Challenges, and Ways Forward” was published in the information and methodological journal Pedagogical Dialogue (No. 3(42), 2022).

<https://nkca.kz/storage/app/media/1NKCA/PublTema/akkreditatsiya-v-kazakhstaneopyt-problemy-puti-resheniya.pdf>

In **2023**, four analytical materials were published, one of which corresponds to the status of a thematic analysis and is entitled “Comparison of Educational Practice in Kazakhstan with International Standards (Based on IKCA-Accredited Programmes)”.

https://nkca.kz/storage/app/media/dokumenty/temanaliz2023/Thematic%20Analysis%20_2023.pdf

In **2024**, two thematic analyses were published. In particular, the Thematic Analysis Based on the Results of Institutional and Programme Accreditation Conducted by the Non-Profit Institution ‘Independent Kazakhstani Center for Accreditation’ for Higher and Postgraduate Education Institutions during the Period 2020–2023 was published in the national scientific and pedagogical newspaper “Ғылым. Білім. Тәрбие” (Science. Education. Upbringing), No. 5(005), dated 24 October 2024. The same thematic analysis was also published in the journal “Technical and Vocational Education”, No. 1(56), 2024.

<https://nkca.kz/storage/app/media/1NKCA/PublTema/2024/1/TemOVPOGazetRu.pdf>

<https://nkca.kz/storage/app/media/1NKCA/PublTema/2024/1/TemOVPOen.pdf>

In **2025**, two thematic analyses were published. One of them is the Thematic Analysis Based on the Results of Institutional and Programme Accreditation Conducted by the Non-Profit Institution ‘Independent Kazakhstani Center for Accreditation’ for Higher and Postgraduate Education Institutions in 2024. It was published in the national scientific and pedagogical newspaper “Ғылым. Білім. Тәрбие” (Science. Education. Upbringing), No. 17(007), dated 01 June 2025.

<https://nkca.kz/storage/app/media/1NKCA/PublTema/2025/TemAkr2024En.pdf>

The second thematic analysis, entitled “The Process of Implementing Student-Centred Learning in Higher Education Institutions of Kazakhstan”, is published on the IKCA website. On the basis of this analysis, a scientific article has been prepared and accepted for publication in the December issue of the journal Pedagogical Bulletin of Karaganda University named after Academician E.A. Buketov.

<https://nkca.kz/storage/app/media/1NKCA/PublTema/2024/2/TemAnalizSCOEn.pdf>

In view of the above arguments, IKCA expresses its disagreement with the conclusion of the Registration Committee set out in paragraph 33 of the Decision, which states that:

“However, according to the expert panel, the documents prepared to date do not contain a sufficient analytical component that would make them useful and relevant for stakeholders in higher education.”

All IKCA thematic analyses are published in open-access printed sources and on the IKCA website and are therefore available to stakeholders in the field of higher education. In addition, in the IKCA Additional Submission dated 09 September 2025, copies of letters addressed to the Ministry of Science and Higher Education are provided, to which IKCA submits its thematic analyses. Each of these letters contains recommendations for higher and postgraduate education institutions based on the results of the thematic analyses, as well as proposals for the Ministry’s leadership aimed at improving quality assurance processes.

IKCA also disagrees with the conclusion of the Registration Committee contained in paragraph 34 of the Decision, which states that:

“However, the Register Committee again emphasised that the submitted documents mainly consist of aggregated results of individual procedures and therefore do not contain the analytical component required for these documents to be considered thematic analyses.”

It should be noted that the ESG do not define clear criteria for what constitutes a thematic analysis. Therefore, in its understanding of the nature and objectives of thematic analysis, IKCA relies on the Guidance to ESG Standard 3.4 – Thematic Analysis, which states:

“In the course of their work, agencies gain information on programmes and institutions that may also be useful for other purposes, providing data for structural analysis of the whole higher education system. Such material can be used for analysis and enhancement of quality assurance policies and processes in institutional, national and international contexts. Careful analysis of such information may show trends in development, areas of good practice, and identify existing challenges.”

In full accordance with this guidance, IKCA develops its thematic analyses by extrapolating conclusions drawn from the accreditation results of a specific sector of higher education to the higher education system of the country as a whole.

It has become established and effective practice for IKCA to submit its thematic analyses to the Committee for Quality Assurance in Science and Higher Education of the Ministry of Science and Higher Education of the Republic of Kazakhstan, i.e. the body directly responsible for coordinating quality assurance activities in higher education. In the most recent two thematic analyses, following in-depth analysis of effective practices in higher education institutions or their programmes, and the identification and grouping of common deviations from IKCA accreditation standards (and, consequently, from ESG standards), general recommendations are provided to accredited institutions and programmes, and proposals are formulated for the Ministry

of Science and Higher Education regarding issues that only the Ministry can assist institutions in addressing. Copies of the relevant letters submitted to the Ministry are attached.

The thematic analysis based on the results of institutional and programme accreditation conducted during the period 2020–2023, as well as the thematic analysis for 2024, contain all the characteristics of research-based analysis rather than simple comparison. This is evidenced by systematisation, analysis, generalisation, and conclusions that go beyond descriptive reporting. The analyses do not merely list observations; instead, they group them by year, type of accreditation, institutions, educational programmes, and specific accreditation standards. The analyses identify recurring issues rather than simply listing isolated findings. Based on the identified issues, the thematic analyses propose concrete recommendations for higher education institutions and policy proposals for the Ministry of Science and Higher Education, which is a key element of research aimed at problem-solving. The analyses also highlight good practices, adding depth and demonstrating a comprehensive analytical approach.

Thus, these thematic analyses do not merely describe observations, but analyse them, identify systemic issues, and formulate recommendations. This distinguishes research-based thematic analysis from a simple statement of facts and is fully consistent with ESG Standard 3.4 – Thematic Analysis.

The above fully applies to IKCA’s most recent thematic analysis, “The Process of Implementing Student-Centred Learning in Higher Education Institutions of Kazakhstan”, which addresses one of the most relevant topics for higher education institutions in the Republic of Kazakhstan.

Based on the arguments presented above, as well as on the requirements of paragraph 2.3 of the ENQA Guidelines for Agency Reviews, the IKCA management requests that the Appeals Committee recommend to the Registration Committee to change the assessment under ESG Standard 3.4 – Thematic Analysis from “partial compliance” to “complies”, i.e. to endorse the assessment given by the ENQA expert panel following the targeted review.

ESG 3.4 THEMATIC ANALYSIS			
19	Page 24 of the report The panel acknowledges the importance and the dedication of the agency to conduct thematic analyses minimally once a year, for the period 2023-2027, as described in IKCA’s Strategic development	During thematic analyses by the IKCA, it was revealed that some external experts do not fully disclose certain criteria of the standards when analyzing educational programs. To solve this problem and improve the quality of accreditation procedures, the IKCA organized and held additional training	

	<p>plan. However, the panel deemed that additional effort should be invested into using the results of the thematic analyses for internal improvements within IKCA. This is due to no evidence gathered in the interviews on the improvements done based on thematic analyses, and it became apparent that most members of IKCA's supervisory bodies were unaware of the concept of thematic analyses, their relevance and topics.</p>	<p>seminars for external experts on 15.01.2024, 16.01.2024, 19.12.2024 and 16.01. 2025 on accreditation standards, compliance with reporting requirements, and a detailed analysis of all criteria for assessing the Standards. As a result of these measures, the reports of external audit expert groups managed to achieve the necessary completeness of analysis and assessment for all criteria of accreditation standards, complete uniformity of the terminology used by experts in the reports, uniformity of design, and a single three-level assessment of compliance with accreditation standards.</p>	
20	<p>Page 24-25 of the report</p> <p>The introduction of the Recommendations on the preparation of a thematic analysis is going to help the agency with the structure of the future thematic analyses. However, it should be noted that the content of the listed thematic analyses does not contain a deeper analysis which is required under the ESG 3.4 Thematic analysis. Both evaluated thematic analyses contain a summative comparison of reports, but no research analysis was performed based on the results of the accreditation procedures.</p> <p>Thematic analyses should go beyond descriptive summaries to include actionable insights and context for higher education stakeholders. Therefore, the panel found the published documents lacking in this regard. For example, in Thematic analysis. Comparing educational practices in Kazakhstan with international standards, key findings are presented</p>	<p>In its understanding of the essence and objectives of thematic analysis, the IKCA proceeds from the Guide to the ESG Standard 3.4 Thematic Analysis, namely: "In the course of their work, agencies generate information about programmes and institutions that can also be useful for other purposes, providing data for structural analysis of the entire higher education system. These materials can be used to analyse and improve quality assurance policies and processes in institutional, national and international contexts. Careful analysis of such information can demonstrate development trends, areas of good practice and identify existing problems."</p> <p>The IKCA, in strict accordance with this guide, forms its thematic analyses and projects conclusions from the analysis of its results on accreditation of a certain sector of higher education to the entire system of higher education in the country.</p> <p>It has already become an effective practice to send thematic analyses of the IKCA to the Committee for Quality Assurance in Science and Higher Education of the Ministry of Science and Higher Education of the Republic of Kazakhstan, that is, directly to</p>	<ol style="list-style-type: none"> 1. Letter to the Ministry of Science and Higher Education with a thematic analysis based on the results of accreditations in 2020-2023 with an attached thematic analysis (No. 425 dated 11.07.2024); 2. Letter to the Ministry of Science and Higher Education with a thematic

	<p>as bullet points, without providing the readers with the context.</p>	<p>the body that coordinates all work on quality assurance of higher education. In the last two thematic analyses, after a qualitative analysis of the effective practice of higher education organizations or their programs, identifying and grouping common deviations from the IKCA accreditation standards, and therefore from the ESG standards, general recommendations are given to accredited universities and programs, proposals are developed for the Ministry of Science and Higher Education on comments that only the Ministry of Science and Higher Education can help universities correct. We attach copies of letters with proposals sent to the relevant ministry.</p> <p>The thematic analysis based on the results of the institutional and specialized accreditation of higher and postgraduate education organizations conducted by the Independent Kazakhstani Center of Accreditation in the period from 2020 to 2023, as well as the thematic analysis for 2024, have all the signs of a research analysis, and not a simple comparison.</p> <p>This is confirmed by the systematization, analysis, generalization and conclusions that go beyond a simple description. The analysis does not simply list the comments, but groups them by year and type of accreditation, universities, educational programs and specific accreditation standards. The analysis identifies recurring problems, rather than simply listing them for each university. Based on the identified problems, the thematic analysis offers specific recommendations for universities and proposals for the Ministry of Science and Higher Education, which is a key element of the research aimed at solving the problem. The study not only focuses on problems, but also notes good practices,</p>	<p>analysis based on the results of accreditations in 2024 with an attached thematic analysis (No. 480 dated 10.07.2025);</p>
--	--	--	---

		<p>which adds depth and demonstrates a comprehensive approach to the analysis.</p> <p>Thus, these thematic analyses do not simply describe the comments, but conduct their research and analysis, identify systemic problems and form recommendations. This is what distinguishes the research analysis from the usual statement of facts, which corresponds to ESG 3.4 "Thematic Analysis".</p> <p>To continue effective work on further improving the work on preparing thematic reports, another employee, PhD Timur Aimukhambetov, has been hired to the Department of Methodology, Monitoring and Quality Assurance.</p>	
<p>Taking into account the above arguments, the assessment of the compliance of the IKCA activities by the ENQA commission as “compliant” with this standard, we ask the Registry Committee to agree with the proposed assessment of the ENQA commission as “compliant” with the ESG standard - Thematic Analysis</p>			

5. ESG STANDARD 3.6 – INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

The IKCA management bases its disagreement with the assessment of “partial compliance” under this standard on the fact that the framework nature of the ESG Guidance for this standard does not allow for such specific conclusions regarding IKCA’s activities as those drawn by the ENQA expert panel and subsequently confirmed by the Registration Committee.

In full accordance with this framework guidance, IKCA has an internal quality assurance policy, which is publicly available on the IKCA website:

<https://nkca.kz/storage/app/media/1NKCA/Akkred/Rukovodstvo/Qach/2/rukovnutrqachru.pdf>

This policy:

- ensures that all individuals involved in the agency’s activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms;
- includes internal and external feedback mechanisms;

- protects against any form of intolerance or discrimination;
 - establishes the necessary links with the relevant authorities under whose jurisdiction the agency operates.
- Accordingly, IKCA expresses its disagreement with the conclusions of the Registration Committee under this standard.

In particular, paragraph 37 of the Registration Committee’s Decision identifies, among the key issues—clearly derived from the ENQA expert panel’s report—that the roles and responsibilities of various groups and committees remain unclear. IKCA fully disagrees with this conclusion, as each structural unit of IKCA is governed by detailed and unambiguous Regulations and Guidelines defining its functions and responsibilities.

With regard to paragraph 38 of the Registration Committee’s Decision, IKCA categorically disagrees with the statement that:

“...the expert panel did not find evidence that IKCA analyses the feedback collected or uses it to improve its structures and activities.”

During the targeted review, upon the very first request of the chair of the expert panel, H. Mattisen, the experts were provided with analyses of feedback received from external review experts and from representatives of the higher education institutions where reviews had been conducted. Such feedback analysis was also included in IKCA’s self-evaluation report.

Paragraph 39 of the Decision notes that IKCA has not yet received any critical feedback requiring revision of its procedures.

If, objectively, no such critical remarks regarding IKCA procedures have been identified—neither in feedback questionnaires nor among more than 50 comments and suggestions submitted by stakeholders via the “Feedback” section of the IKCA website—then there has objectively been no necessity for such revisions. This is evident.

Moreover, the IKCA website clearly demonstrates that none of the more than 50 submissions received through the “Feedback” section has remained unanswered by IKCA.

Through feedback questionnaires and the “Feedback” section on its website, IKCA provides any interested party (expert, review coordinator, representative of an accredited higher education institution, etc.) with the opportunity to submit critical assessments of IKCA’s activities. To date, however, such critical proposals have been received—at IKCA’s request—only with regard to accreditation standards and certain regulatory documents, which were duly reviewed and adopted.

Based on the above arguments, as well as on the comments addressing each of the remarks set out in IKCA’s Additional Submission under ESG Standard 3.6 – Internal Quality Assurance and Professional Conduct, which overall demonstrate the lack of validity of certain remarks and the correction of others before the completion of the ENQA review visit, the IKCA management requests that the Appeals Committee recommend to the Registration Committee to

change the assessment under ESG Standard 3.6 – Internal Quality Assurance and Professional Conduct from “partial compliance” to “complies.”

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT			
21	Page 27 of the ENQA commission report: IKCA does not have a described procedure for subcontractors’ adherence to the ESGs, and the panel did not obtain information of any subcontractors hired by IKCA.	Due to the specific nature of the agency’s work, there is no need to involve subcontractors in the accreditation processes.	
22	Page 27 of the ENQA commission report: The roles of some of these bodies are clear (Working Group, Appeals and Complaints Commission) but the Accreditation Council, the Supervisory Board members and the members of the Expert Council at times had difficulties expressing their roles in internal processes. For example, they had difficulties explaining their role in the improvement of standards and guidelines of IKCA (Accreditation Council, Expert Council) or providing feedback for improvement of IKCA’s processes (Supervisory Board).	<p>The IKCA actively involves external stakeholders in the work on introducing changes and additions to the accreditation standards. We provide evidence of this below:</p> <p>There are minutes of meetings of the Expert Council on Pedagogical Education on work with standards for accreditation of organizations/programs of pedagogical education:</p> <p>Minutes No. 1 of December 25, 2022 of the meeting of the Expert Council on Pedagogical Education of the Non-Profit Institution "Independent Kazakhstani Center of Accreditation" with the following agenda:</p> <p>Agendas:</p> <ol style="list-style-type: none"> 1. About the professional standard "Teacher". 2. On the development of standards for accreditation of educational programs in pedagogical education. <p>At this meeting, the members of the Expert Council were presented with the professional standard “Teacher” and were tasked with taking part in the development of the Standard for the accreditation of pedagogical education (institutional and programmatic).</p>	<p>Minutes of the meeting of the Expert Council No. 1 dated 13/25/2022</p> <p>Minutes of the meeting of the Expert Council No. 2 dated 03.03.2023</p> <p>Minutes of the meeting of the Accreditation Council (March 2024)</p>

		<p>At the next meeting No. 2 on March 3, 2023, a discussion of the standards of institutional and program accreditation of pedagogical education developed with the participation of stakeholders took place at a meeting of the Expert Council on Pedagogical Education. Doctor of Pedagogical Sciences, Professor N.A. Zavalko, professor of the Kazakh National Pedagogical University named after Abay, Deputy Chairman of the Accreditation Council, Candidate of Pedagogical Sciences S.I. Ferkho gave her proposals for inclusion in the standards. (Minutes of the meetings of the Expert Council are available). Regarding the participation of the Supervisory Board in the work on accreditation standards, we would like to clarify that the functions of this IKCA body do not include work related to the development of a regulatory framework, including accreditation standards. Members of the Accreditation Council directly work with accreditation standards, studying self-assessment reports of educational organizations and their programs, reports of external expert groups, making decisions on them, and experiencing in practice how individual criteria of a particular accreditation standard work or do not work. They actively participate in training seminars on IKCA standards and procedures, making individual proposals for updating the Guidelines for organizing and conducting external assessment. For example, in March 2024, a special meeting of the Accreditation Council was held, at which, among other items on the agenda, the issue of a possible update of the IKCA accreditation standards and amendments to the Regulation on the Accreditation Council was considered. (minutes of the meeting are attached)</p>	
--	--	---	--

23	<p>Page 27-28 of the ENQA commission report: The roles of some of these bodies are clear (Working Group, Appeals and Complaints Commission) but the Accreditation Council, the Supervisory Board members and the members of the Expert Council at times had difficulties expressing their roles in internal processes. For example, they had difficulties explaining their role in the improvement of standards and guidelines of IKCA (Accreditation Council, Expert Council) or providing feedback for improvement of IKCA's processes (Supervisory Board).</p>	<p>Even before the arrival of the ENQA expert group on 01.11.2024, the ongoing work on providing feedback to stakeholders (educational organizations, experts) was formalized in an internal document called "Instructions for Ensuring Interaction with Stakeholders" as a supplement to the Internal Quality Assurance Guidelines. Both the Guidelines and this Instruction describe the procedures for providing feedback, present forms for providing feedback through feedback questionnaires, in an online form through the IKCA website in the "About Us" section, in the "Feedback" heading..</p> <p>The agency's management regularly holds operational meetings to discuss current accreditation issues, where feedback is provided to external audit coordinators, employees of the accreditation department, the methodology department, monitoring and quality assurance.</p> <p>Training seminars are systematically held for members of the Accreditation and Expert Councils, external audit experts, and for regional representatives performing the functions of external audit coordinators.</p> <p>The management of the IKCA and the Deputy Director of the IKCA have developed materials for testing IKCA employees, as well as experts, on the subject of knowledge of the content of accreditation standards, the essence and content of the main accreditation procedures.</p> <p>Based on the results of monitoring, the management of the Non-Profit Institution "IKCA" takes preventive and corrective actions, in particular, to update the staff and the database of external audit experts.</p>	<p>Guideline for internal quality assurance of the Independent Kazakhstan center of accreditation https://nkca.kz/storage/app/media/INKCA/Akcred/Rukovodstvo/Qach/2/rukovnutrqachen.pdf Instructions for ensuring interaction with stakeholders https://nkca.kz/storage/app/media/INKCA/Akcred/Rukovodstvo/InstrVzaimo/InstrVzaimoEn.pdf</p>
----	---	--	--

		<p>If low test results are found (less than 50% of the maximum score of 30 units), the question of sending the employee for advanced training ahead of schedule is raised, and experts are invited for additional training in accreditation procedures. If these measures are refused, the question of suspending the employee from work is raised, and the expert is removed from the expert database.</p> <p>The Regulation on the Accreditation Council includes a clause according to which new members of the Council are required to undergo control questionnaire tests after conducting training seminars on accreditation procedures and internal regulatory documents..</p>	
24	<p>Page 28 of the ENQA commission report: IKCA's newly adopted policy on internal quality assurance was seen by the panel as a step back in terms of the comprehensiveness and coverage of internal quality assurance processes, compared to the manual available to the panel at the last ENQA review. The content of the new policy has decreased almost threefold, leading to the lack of descriptions of various stakeholders' role in accreditation processes. This was one of the issues observed also in the past review, so the panel concluded that the same challenges still persist</p>	<p>Immediately after the external audit of the ENQA expert commission, the Expert Council for Higher and Postgraduate Education proposed that the Department of Methodology, Monitoring and Quality Assurance return to the version of the Internal Quality Assurance Guide that was in effect until 2022, which clearly presented the roles of all structural divisions, Councils, and commissions in the internal quality assurance processes during accreditation (Guidelines are attached).</p>	<p>Guideline for internal quality assurance of the Independent Kazakhstan center of accreditation https://nkca.kz/storage/app/media/1NKCA/Ak_kred/Rukovodstvo/Qach/2/rukovvnutrqachen.pdf</p>
25	<p>Page 28 of the ENQA commission report: For example, an excerpt from the document states: "The answer to question 5 was important for the IKCA: 'Which of the listed principles, in your opinion, are observed in the procedures for external quality assessment of the IKCA? (You can select several answers from the following:</p>	<p>The example given by the ENQA commission from the feedback analysis clearly demonstrates that the IKCA staff manages to implement the following measures during external assessment when conducting accreditation procedures: the real effect of the listed immutable principles of assessment, quality assurance by all participants in external assessment</p>	<p>About Us section of the website https://nkca.kz/en/obratnaya-svyaz</p>

	<p>Independence, Objectivity, Transparency, Systematicity and Integrity, Non-affiliation, Confidentiality, Compliance with the Expert's Code of Honor, All of the above principles).' The analysis showed that more than 83% of experts answered that all of the above principles underline the accreditation procedures of the IKCA and are strictly observed." Therefore, the analysis is limited to stating the result and does not provide separate evaluations of the different aspects of data. Therefore, in panel's view, the principle of conducting an analysis based on feedback results has not been followed by the agency. Furthermore, the panel was unable to ascertain to improvements made within the agency based on the feedback collected from the interviews with IKCA's executive management and senior management staff</p>	<p>procedures. Evidence of this belief is that from 2019 to this day there has not been a single complaint about violations of these principles by experts, coordinators, members of the Accreditation Council, employees of the IKCA, accredited educational organizations.</p> <p>On the IKCA website, in the "About Us" section, there is a "Feedback" tab, which states that any interested person can "... ask a question of interest to you, send comments, remarks or suggestions," that is, we have given the right to any person to participate in the processes of improving the quality of the IKCA's activities.</p> <p>An analysis of 50 reviews of the IKCA's activities during accreditation posted on the IKCA website also shows that there are only positive reviews.</p> <p>During the external visit, the Deputy Director presented a number of improvements in the activities of the IKCA as a result of feedback from participants in the accreditation procedures.</p>	
26	<p>Pages 28-29 of the ENQA commission report: However, in discussions with the coordinators, it became clear that their role was not to provide substantive support to the committees or to ensure continuity in the accreditation process. The expert group believes that in the interests of continuity in the accreditation process, the coordinators should play a much larger, more meaningful role. Given that the number of higher education accreditations has grown significantly in recent years, while the agency's staff numbers have not increased significantly, the agency should find ways to further support and develop the competencies of its coordinators. This will enable them to play a more</p>	<p>For unknown reasons (maybe they didn't understand the questions), regional representatives were unable to fully present their powers during the interview. In fact, they do all the work with educational organizations in their regions to find universities and their educational programs that want to undergo accreditation. During accreditation, they do all the difficult work of coordinators to prepare and conduct an external audit, accurately implement all audit activities, and consult experts on the preparation of EEG reports, without interfering in the process of assigning grades.</p> <p>However, training seminars on all accreditation procedures are regularly held for regional representatives as coordinators of external audits.</p>	<p>Clause 4.3 of the "Guidelines for the organization and conduct of external assessment (audit) within the framework of institutional and specialized accreditation"</p> <p>https://nkca.kz/storage/app/media/1NKCA/Ak_kred/Rukovodstvo/240125/1.pdf</p>

	<p>meaningful role, advise the IKCA standards and guidelines committees and ensure that there are no conflicts of interest in place.</p>		
27	<p>Based on what the ENQA expert committee writes in its report: “Since the committee bases its assessments on the information available until the end of the assessment visit....., based on the above arguments of the IKCA on each of the comments, which generally indicate the inconsistency of individual comments, the correction of other comments before the completion of the ENQA assessment visit by the committee, the IKCA management requests to revise the assessment for this standard ESG 3.6 INTERNAL QUALITY CONTROL AND PROFESSIONAL CONDUCT, changing it from the assessment “partial compliance” to “complies.”</p>		