

ENQA TARGETED REVIEW

AGENCY FOR QUALITY ASSURANCE IN THE GALICIAN UNIVERSITY SYSTEM (ACSUG)

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CONTENTS

CONTENTS	1
EXECUTIVE SUMMARY	3
INTRODUCTION	5
BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS	5
BACKGROUND OF THE REVIEW.....	5
SCOPE OF THE REVIEW.....	5
MAIN FINDINGS OF THE 2019 REVIEW.....	7
REVIEW PROCESS.....	10
CHANGES WITHIN THE AGENCY	16
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM.....	16
ACSUG'S ORGANISATION/STRUCTURE.....	16
ACSUG'S FUNDING.....	16
ACSUG'S FUNCTIONS, ACTIVITIES, PROCEDURES.....	17
FINDINGS: COMPLIANCE OF ACSUG WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW	19
ESG PART 3: QUALITY ASSURANCE AGENCIES	19
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE.....	19
ESG 3.3 INDEPENDENCE.....	27
ESG 3.4 THEMATIC ANALYSIS.....	31
ESG PART 2: EXTERNAL QUALITY ASSURANCE	35
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE.....	35
ESG 2.7 COMPLAINTS AND APPEALS.....	41
ENHANCEMENT AREAS	45
ESG 3.5 & 3.6	45
ESG 3.5 RESOURCES.....	45
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT.....	47
ADDITIONAL OBSERVATIONS	51
CONCLUSION	52
SUMMARY OF COMMENDATIONS	52

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS	52
SUGGESTIONS FOR FURTHER IMPROVEMENT	53
ANNEXES.....	55
ANNEX 1: PROGRAMME OF THE SITE VISIT	55
ANNEX 2: TERMS OF REFERENCE OF THE REVIEW	63
ANNEX 3: GLOSSARY	71
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW	72
DOCUMENTS PROVIDED BY ACSUG	72
OTHER SOURCES USED BY THE PANEL	73

EXECUTIVE SUMMARY

This report analyses the compliance of the Agency for Quality Assurance in the Galician University System, (Axencia para a Calidade do Sistema Universitario de Galicia), ACSUG, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on a targeted review conducted over a period of seven months from December 2023 to June 2024 and should be read, together with the external review report of the agency's last full review in 2019, in tandem with the ESG 2015. The site visit to ACSUG took place from 18th to 21st March 2024.

ACSUG was created in 2001 as a consortium between the Galician Government and the Galician University System (SUG). The ACSUG website has a statement of the agency's mission and vision:

"The basic mission of the ACSUG is to promote and oversee guaranteeing the quality of the Galician University System (GUS) (sic), focusing on its continuous improvement and transferring relevant information to society at large about the activities carried out and their results, ensuring that the GUS is constantly adapted to the social and economic situation at any given moment."

"The ACSUG seeks to be an agency of demonstrated quality and efficiency and to be recognised as such at both national and international level, in the sphere of university quality assurance, carrying out its work according to the principles of independence, objectivity and transparency, based on national and international standards for higher education quality assurance."

The agency performs a broad range of quality assurance activities in Galicia and also does some international work in Central and South America. This targeted review covers the following activities, as agreed in the Terms of Reference:

- programme evaluation, monitoring and accreditation (*ex-post* and *ex-ante* in Galicia, *ex-post* only for international activity);
- institutional evaluation (including institutional accreditation, monitoring and assessment of institutional accreditation systems (FIDES-AUDIT));
- and teaching performance assessment (DOCENTIA).

Also, ACSUG performs a range of functions in Galicia that lie outside the scope of an ENQA review.

Based on the agreed Terms of Reference, this review covers ESG 2.1 (Consideration of Internal Quality Assurance), 2.7 (Complaints and Appeals), 3.3 (Independence), 3.4 (Thematic Analysis). ACSUG nominated ESG 3.5 (Resources) and 3.6 (Internal Quality Assurance and Professional Conduct) as the areas selected for the enhancement focus. The panel decided to include 3.1 (Activities, Policy and Processes for Quality Assurance) as an additional area in the report.

The panel considered the evidence provided in the self-assessment (SAR), additional evidence requested by the panel, evidence gleaned from an examination of the agency website, and evidence collected during interviews conducted on the site-visit. The panel also requested and was given a demonstration of the ACSUG database that has been updated since the last review.

It was concluded that there is some evidence of progress since the last full review but, that on some key issues, there has been no substantial change. The panel was concerned from the outset by the absence of an agency strategy, and this became a greater focus of concern during the site-visit. The panel is cognisant that the strategy is enacted and manifests itself in tandem with governance structures, internal communication and internal organisational culture and is not necessarily entirely to be found in a formal agency strategy policy or document. However, the overarching guidance and sense of direction and purpose which the panel sought was only patchily evident.

ACSUG continues to enjoy the trust of its stakeholders but there may now be an opportunity to shift the focus from procedural compliance to enhancement.

Summary of agency’s compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review¹	Compliance transferred from the last full review²
2.1	Compliant	
2.2	Not included in the targeted review	Fully Compliant → Compliant
2.3	Not included in the targeted review	Fully Compliant → Compliant
2.4	Not included in the targeted review	Fully Compliant → Compliant
2.5	Not included in the targeted review	Fully Compliant → Compliant
2.6	Not included in the targeted review	Fully Compliant → Compliant
2.7	Partially Compliant	
3.1	Partially Compliant	
3.2	Not included in the targeted review	Fully Compliant → Compliant
3.3	Partially Compliant	
3.4	Partially Compliant	
3.5	Compliant	
3.6	Compliant	
3.7	Not included in the targeted review	Compliant (by virtue of applying)

¹ Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark “for new or changed QA activities only” is added in brackets to the compliance assessment.

² Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

INTRODUCTION

This report analyses the compliance of the Agency for Quality Assurance in the Galician University System, (Axencia para a Calidade do Sistema Universitario de Galicia), ACSUG, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG, 2015). It is based on an external review conducted over a period of seven months from December 2023 to June 2024 and should be read together with the external review report of the agency's last full review in 2019 against the ESG. The site visit to ACSUG took place from 18th to 21st March 2024.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

ACSUG has been a member of ENQA and listed on EQAR since 2009.

As ACSUG has undergone three successful reviews against the ESG Parts two and three, it is eligible for and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes³ during the past five years while at the same time further strengthening the enhancement part of the review.

SCOPE OF THE REVIEW

As stated in the tripartite Terms of Reference agreed between ENQA, EQAR and ACSUG in 2023 (a complete text provided in the Annex 2 to the present report), the targeted review covers the following activities within the scope of the ESG:

At programme Level:

- Assessment cycle of Galician degrees: validation (ex-ante accreditation), monitoring, modifications and accreditation (cyclical process),
- Joint programme accreditation,
- Accreditation of degrees and university centres outside Spain (international ex-post accreditation and monitoring)

(Following discussion between the three parties, evaluation of art degrees was removed from this category as the procedure used by ACSUG was a pilot which will not be used in the future).

At Institutional level:

- Institutional accreditation,

³ e.g. organisational changes, the launch of new external QA activities.

- Institutional monitoring⁴,
- Assessment of institutional QA systems (FIDES-AUDIT),
- Assessment of institutional QA systems international (FIDES-AUDIT international),
- Teaching performance assessment programme (DOCENTIA).

The following activities of ACSUG were deemed to fall outside the scope of the ESG:

- Assessment of academic staff,
- Research evaluation activities,
- Labour market insertion studies.

As this is a targeted review, there was also an agreement in place that defined the areas to be the subject of this review. These areas are those on which a judgement of partial compliance was delivered at the conclusion of the 2019 review. Therefore, the focus areas of the review are identified and described in the terms of reference:

1. ESG 2.7 - due to a lack of an independent appeals board. The review should explore further whether the agency operationalised its plans to establish such a body and explore the procedures for nomination of its members.

2. ESG 3.3 - due to the direct involvement of the Galician Government in the appointment of the majority of members in the agency's Governing Board, in the appointment of president of the Governing Body, the president of the agency's decision-making body (CGIACA), the Director of the agency and the president of the Advisory Council.

3. ESG 3.4 - due to scarce publishing of thematic analyses. The review should further explore the implementation of the plans regarding the setup of external working groups for developing thematic analysis and further collaboration with other bodies. The review should look into whether the agency developed a system for creating and publishing thematic analysis.

In addition, ACSUG selected two standards for inclusion as its enhancement areas:

- ESG 3.5 Resources, and
- ESG 3.6 Internal quality assurance and professional conduct.

Finally, ESG 2.1 is reviewed as an essential component on all targeted reviews.

The guidelines for a targeted review allow the panel to include additional standards that come to their attention in the course of the review as meriting inclusion because of their findings. On this occasion, following extensive review and discussion, the panel took the decision to include ESG 3.1, Activities, Policy and Processes for Quality Assurance. This decision was taken following a review of the SAR, the ACSUG website, the additional documentation sought by the panel and the meetings conducted during the site visit. In particular the panel has made findings and recommendations connected to the goals, strategy, implementation of strategy and evaluation of its own performance in ACSUG. The panel is hopeful that its analysis and reflection on ESG 3.1 will help the agency in its enhancement efforts.

⁴ The latter during the course of the review was found as not being implemented, thus, later omitted, as explained in the report.

MAIN FINDINGS OF THE 2019 REVIEW

The 2019 ENQA panel reached the following conclusions in respect of ACSUG's compliance with the ESG 2015:

- Fully compliant: 3.1, 3.2, 3.3, 3.7, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6;
- Substantially compliant: 2.7, 3.5, 3.6;
- Partially compliant 3.4.

The Board of ENQA, in arriving at a final decision, changed the compliance on Standard 3.3 from full to substantial and in its communication with ACSUG included an Annex of areas for further development, listed below:

3.3 (Independence)

Recommended to ACSUG that it *“appoint non-Galician members in all the agency's governing and evaluations bodies, which would be a way to further enhance ACSUGs' independence”*.

3.4 (Thematic Analysis)

Recommended to ACSUG that it *“develop their thematic analysis based on the data they gather in their external quality assurance activities.”* It also recommended that the agency explore outsourcing work pending the appointment of additional staff to deal with the outstanding work in this area.

3.5 (Resources)

Recommended that ACSUG *“continue the efforts to solve the issues related to the vacancies with the ministry in order to ensure full staffing as soon as possible.”* Other recommendations under this standard were that ACSUG use its unused funds to outsource some work, including the translation of the ESG to Galician. The third recommendation was that ACSUG *“recruit experts from outside of Galicia for all its governing and evaluation bodies.”*

The 2019 panel report noted that ACSUG was a *“well-established and respected agency in the Galician University System, Spain and beyond.”* The report also noted that stakeholders considered that staff of the agency performed their processes in a *“consistent, fair and helpful manner”* and that the agency was also regarded by stakeholders as an *“instrument for enhancing quality in the university sector.”* The panel praised ACSUG for its work in South America, particularly in light of the size of the agency and its limited resources. The report also stated that ACSUG *“gives the impression of being a forerunner and inspirer in the Spanish and international sector.”* In addition, the panel was impressed that ACSUG had multi annual funding in place which they saw as assisting the *“predictability of operations”* and the capacity of the agency to *“forward-plan”*.

The report also noted some overarching areas for improvement in its final section:

- the need to strengthen the expertise and independence on the Galician Committee for Reports, Assessment, Certification and Accreditation (CGIACA) and the Governing Board by including members from outside Galicia;
- the need to establish an independent Appeals and Complaints committee that could review initial decisions before the move to judicial procedure;
- ACSUG had *“a way to go”* in developing its activity of thematic analysis. This was *“especially”* noted. Whilst acknowledging the constraints arising from lack of personnel, the panel considered that the agency had sufficient financial resources to outsource work as an interim measure.

3.6 (Internal Quality Assurance and Professional Conduct)

The Board of ENQA recommended that ACSUG “develop a policy for equal opportunity that also guards against intolerance or any kind of discrimination, which covers the agency and all its activities.”

2.7 (Complaints and Appeals)

The recommendation here was that ACSUG “use an independent committee or body to evaluate appeals on decisions made by the CGIACA before starting the jurisdictional procedure.”

EQAR Approval

The EQAR registration process was completed in March 2020. EQAR had a different view on two of the judgements in the panel report:

ESG 2-7 - Changed from substantial to partial compliance

ESG 3.3 - Changed from full compliance to partial compliance.

EQAR concurred with all other findings and stated that ACSUG “continues to comply substantially with the ESG as a whole.”

ACSUG Follow-Up Report 2021

For the purposes of this targeted review in 2024, the panel paid particular attention to the trajectory of findings, recommendations and suggestions made to ACSUG and to the responses made by the agency during the period 2019-2024. In this context the details of the follow-up report in 2021 are outlined. This will be the subject of additional comment later in this report and for that reason its content is noted here. ACSUG opted to take part in the progress process as well, and this took place in 2021. Overall, the follow-up report contained a series of agency’s responses and comments to the panel’s suggestions and recommendations from 2019:

ESG 2.1 “The panel encourages ACSUG to follow up on translating the ESG 2015 to Galician to increase their visibility. (ACSUG commented that the translation had been done and that the document was being prepared for publication “as soon as possible”).

ESG 2.2: The panel suggested that “ACSUG could explore whether and how they can devolve more of the operational aspects of responsibilities in quality assurance to universities to advance their quality culture, and support universities to further develop qualitative and effective approach to quality assurance processes.” The ACSUG response stressed the importance of the move to institutional accreditation and showed that three of the Universities in Galicia met the requirements to carry out the institutional accreditation of centres.

ESG 2.3 ACSUG was encouraged to “implement the 2018 evaluation guide for international evaluation processes based on the 2015 ESG.” ACSUG responded that “until now, there are no evidences of the use of the updated guidelines due to the lack of new processes in the last two years.” ACSUG said it was developing a new procedure for submitting information by “the foreign universities”.

ESG 2.4 ACSUG was encouraged “to pursue its efforts to increase the involvement of international experts in the panels.” ACSUG responded that it had three international experts collaborating with it, one on the Engineering and Architecture Committee, one on the Arts and Humanities committee, and one on the Social and Legal Science committee. ACSUG said its aim was to have at least one international expert in each evaluation committee for degrees. They pointed to the difficulty of finding international

experts with the required competence in Spanish because the documentation used during the process is in Spanish.

ESG 2.6 The recommendation here was that ACSUG adapt *“the structure of self-evaluation reports and external evaluation reports to stimulate a more self-critical and analytical approach in evaluation reports.”*

The panel also suggested *“adapting the database for reports of evaluation to include the English name of joint and inter-university degrees to increase their visibility.”* ACSUG responded that it consistently highlighted to universities the need to improve the analytical focus. In respect of the English names of joint and inter-university degrees, ACSUG pointed to their availability on the DEQAR database.

The panel also suggested that ACSUG explore *“ways to further disseminate information and data in reports to stakeholders such as students, parents and employers.”* ACSUG pointed to its publication of *“labour insertion studies”* on its website and the organisation of events to publicise their findings.

ESG 2.7 *“The panel recommends using an independent committee or body to evaluate appeals of decisions made by the CGIACA before starting the jurisdictional procedure.”* ACSUG gave an undertaking to create a specific committee to deal with appeals. Its structure and composition was under discussion in 2021.

ESG 3.1 The recommendation here was that ACSUG *might consider taking actions to stimulate universities to take a whole-of institution perspective on quality assurance, devising appropriate methods for external evaluation of the effectiveness of implementation of such a perspective”*. The ACSUG response referred ENQA back to its response to ESG 2.2.

The panel suggested *“including a strategy for all activities in the Strategic Plan, also the international evaluations and collaborations.”* The response of ACSUG referred to the *“new Strategy 2021-2025.”*

ESG 3.3 *“ACSUG is recommended to appoint non-Galician members in all the agency’s governing and evaluations bodies, which would be a way to further enhance ACSUGs’ independence.”* ACSUG referred to ongoing efforts to solve this issue within the confines of ACSUG’s statutes and other applicable legislation. It confirmed that no change had taken place at that date.

“The panel suggests setting procedures for the selection of the Director of the agency, president of the Governing Board and president of the CGIACA based on professional competence and prior experience.” The ACSUG response was: *“The selection procedure of the aforementioned positions is established in the ACSUG statutes. In the statutes, it is said that the three positions (Articles 21, 13 and 23) are covered considering professional competence and prior experience.”*

The panel suggested *“putting procedures in place in order to cover personnel vacancies independent from the public administration on a temporary basis, until staff positions are created and filled through public procedures.”* ACSUG outlines its on-going difficulties in dealing with this issue arising from the procedures in place in the Department of Human Resources in the Galician government.

ESG 3.4 *“1. The panel recommends that: the agency develop their thematic analysis based on the data they gather in their external quality assurance activities. 2. The panel recommends that, pending the appointment of additional staff, the agency explore options for outsourcing the work of thematic analysis.”*

ACSUG acknowledged its deficits and difficulties in respect of this standard. It mentioned the work of REACU in organising different thematic activities and that all Spanish agencies were participating in this work.

ESG 3.5 *“The panel recommends that the agency continue to work to solve the issues related to the vacancies with the ministry in order to ensure full staffing as soon as possible.”*

ACSUG commented on its efforts to recruit staff and said that once vacancies had been filled a new organisational chart would be developed to align staff to activity.

“The panel recommends that the agency uses its unused funds to creatively outsource some work, for example the translation of the ESG to Galician and thematic analysis.”

ACSUG said it had outsourced the translation of the ESG Standards into Galician but that to outsource work on thematic analysis would require an internal coordinator and they did not have one available. *“The panel recommends recruiting experts from outside of Galicia for all its governing and evaluation bodies.”* ACSUG referred back to its response to ESG 3.3.

ESG 3.6 *“The panel recommends the agency to develop a policy for equal opportunity that also guards against intolerance or any kind of discrimination, which covers the agency and all its activities.”*

ACSUG undertook to *“stress specifically its commitment with the equal opportunity and against any kind of discrimination. Therefore, in the new ACSUG code of ethics and in the Strategic Plan 2021-2025 this topic it is going to be remarked upon.”*

Other Issues Raised in the 2021 Follow-Up Report

In the remaining sections of its response in 2021, ACSUG outlined how it had responded to the pandemic by moving its procedures on-line and introducing remote working for staff. These changes were still in place in 2021. It also mentioned that it planned to move to new premises, that it had joined INQAAHE, the creation of the first private university in Galicia, and the publication by the Ministry of Universities of the Government of Spain in 2021 of 822/2021 Royal Decree, of 28 September, which establishes the organisation of university education and the procedure for quality assurance. The approval of this Royal Decree rendered the previous one (Royal Decree 1393/2007) obsolete.

REVIEW PROCESS

The 2024 external targeted review of ACSUG was conducted in line with the process described in the *Guidelines for ENQA targeted reviews*, the EQAR Policy on targeted reviews and EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel took note of the Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies by Register Committee (Ref. RC/12.1; Ver. 3.0; dated 04/09/2020). The panel for the targeted review of ACSUG was appointed by ENQA and composed of the following members:

- Aurelija Valeikienė, Deputy Director, Centre for Quality Assessment in Higher Education (SKVC), Lithuania, Chair, QA professional (ENQA nominee);
- Marion Coy, Higher Education Consultant, President Emerita, Galway-Mayo Institute of Technology, Ireland, Secretary, QA professional (ENQA nominee);
- Jordi Villà-Freixa, Full Professor, Universitat de Vic - Universitat Central de Catalunya, Spain, panel member, academic (EUA nominee);

- Damir Solak, Public Law Studies (Doctoral Degree Study Programme), Masaryk University, Faculty of Law, Czech Republic, panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

Goran Dakovic, Head of ENQA Agency Reviews, acted as the review coordinator.

Having completed its check for possible conflicts of interest, ENQA confirmed to the members their appointment as the panel on 6 December 2023. At that date the ACSUG SAR was just being completed. ENQA, EQAR and the panel agreed that the initial on-line briefing would take place on 15th January 2024. The dates for the site visit - 18-21 March 2024 - were also agreed at this time. The panel was given access to a shared drive containing all key documents including the terms of reference for the review. The ACSUG SAR was shared with the panel on 9th January 2024 and the panel was also notified that the short document required from ACSUG for the two standards selected for enhancement had not been received at that date. The Chair of the panel asked all members to prepare an initial response to the SAR and to identify any potential additional document that would be required. It was agreed that any such gaps would be discussed at the meeting on 15th January. Initial contact was made with the ACSUG contact person, Luis Velon, in advance of the briefing meeting.

At the on-line briefing meeting, the ENQA co-ordinator first gave the background to the review. He reminded the panel that this was a targeted review and that ACSUG, a candidate member of ENQA since 2007, had completed three previous full reviews in 2009, 2014 and 2019. Follow-up reports in respect of the earlier reports had been submitted to ENQA in 2011, 2016 and 2021.

The focus areas for this review - as agreed in the terms of reference - were:

ESG 2.1 (as required in all targeted reviews), ESG 2.7, ESG 3.3, ESG 3.4.

The areas selected for the enhancement section of the review were: ESG 3.5, ESG 3.6.

No new external QA activities had been initiated since the last full review in 2019.

The EQAR representative joined the on-line meeting. He clarified that the evaluation of Art degrees mentioned in the SAR had been an activity piloted by the agency but never subsequently used. Therefore, this did not constitute new activity for the purpose of the review. He noted the reference in the SAR to expected substantial change in "institutional monitoring" procedures and asked that the panel check on this. The panel was asked to note the comments on ESG 2.6 (publishing of *ex-ante* accreditation reports) in the EQAR letter of 2020 and asked that this panel investigate the operational independence of ACSUG. In relation to ESG 3.3, it was asked that the procedure for the appointment of senior managerial post-holders and the members of key committees (including the Governing Board and the CGIACA) be examined. It was stated that EQAR had set out its expectations in relation to all these appointments in previous reports and that on this occasion the panel needed to establish if there had been any change since the previous review.

The ENQA Coordinator then provided further guidance to the panel on how both accountability and enhancement should be approached in the context of mature agencies that had undergone multiple previous reviews. He also emphasised that this panel must satisfy itself that there had been no substantial changes in relation to the standards not under review on this occasion. He reminded the panel that it could decide to add additional standards for review should the review process lead the panel to conclude that this was warranted.

A discussion took place on how to approach the enhancement section of the review and it was agreed by the panel that ACSUG should be asked to give the panel a separate document for each of the two standards selected by ACSUG. The panel felt that these short documents should be analytical and

reflective in approach and that, in each case, they should identify the key challenges and questions the agency wished to discuss with the panel.

The panel then agreed on a list of additional documents it would like the agency to supply. Machine translation was to be used where possible. The panel members agreed to populate the mapping grid with potential questions for each of the standards under review. The panel also considered the site-visit schedule, and the secretary was asked to prepare a provisional schedule for review by the panel and then by the agency.

Self-assessment report

The SAR was provided to the panel on 9th January 2024 and discussed at the preliminary meeting on 15th January. The SAR outlined the history of the agency, the process used to develop the SAR, and changes in the Galician system between 2019 and 2023.

The SAR states that the self-evaluation took place once the terms of reference had been agreed with ENQA and EQAR in August 2023. A draft was developed by the ACSUG Quality Manager in consultation with the staff and sent to ENQA for comment. It was then revised to take account of the feedback. Further feedback on the document was sought from the Governing Body, the Galician Commission for Reports, Evaluation, Certification and Accreditation (CGIACA) and the ACSUG Advisory Council. The final version was submitted to ENQA on 9th January, 2024.

The SAR provided details of activities undertaken by the agency in the period under review. In 2020, ACSUG became a member of INQAAHE and has attended its meetings and conferences. ACSUG has also participated in Erasmus+ projects during the period under review. From 2021-2024 ACSUG is also participating in the E.U Erasmus+ project, evaluation of Teaching Staff Training in Latin America and the Caribbean: Quality Assurance for Degrees in Education (ECALFOR) involving 19 institutions from 9 countries in Latin America, the Caribbean and Europe.

Changes in the regional system are flagged in the document as is the establishment of a new private university.

The SAR follows the template recommended by ENQA and outlines its responses to all the areas that received a partial compliance judgement in 2019. All the activity of ACSUG under ESG 2.1 for the period under review is detailed. ACSUG tabulates how it aligns activity with the requirements of ESG, Part 1. This will be further considered in the section of this report covering ESG2.1. A list of updated evaluation guides is included in the SAR with hyperlinks to the documents. There is a short section in the document on the areas selected for enhancement. Part 3 of the SAR contains the SWOT analysis and begins by referencing the Strategic Plan of 2016-2020 and states that work has commenced on a Strategic plan for 2024-2028. There is little detail given on the process of creating the SWOT.

The panel got a good outline of the work of the agency in the SAR. The high level of activity in ACSUG is very evident from the document, as is the commitment of staff to updating their guidelines. The document also shows that some of the issues raised in 2019 have received some degree of attention - as in the establishment of an appeals and complaints procedure, the new Code of Ethics, and the appointment of an international member to the Governing Board. This will be the subject of further comment under the appropriate standard. The document, however, does not provide a detailed update on all the recommendations and suggestions made in 2019 and raised again in 2021.

The document has hyperlinks to relevant documents on the website. These were very useful and enabled the panel to link easily to certain information. However, the absence of appendices in the document may have contributed to the volume of requests from the panel for additional material. It may be worth reviewing these requests to see how it would have been possible to provide appendices covering key agency documents such as its quality manual and the minutes of meetings of the Governing Board. The agency contact person was very responsive and efficient in providing the requested documents. The panel indicated that machine translation of documents would suffice and this provided a workable solution that enabled all the panel to review most documents.

However, there were notable omissions from the SAR. There was no reference to a current Strategic Plan, no evaluation of objectives against such a plan and no section dealing with the annual reports of the agency. Nor were any of these documents to be found on the website. ACSUG mentions a strategic plan in its 2021 comments in the follow-up report of that year, but no such plan was ever completed. The SAR has a good description of ACSUG's day-to-day activity but would have benefited from a section covering major change or innovation in the agency. It is of particular note that the commentary on the recommendations of the 2019 review in the 2021 follow-up report seem to show little evidence of development and again the commentary in this SAR does not demonstrate clearly where progress has been made. The SAR does not show any level of external engagement with stakeholders in its preparation and there is very little evidence of any substantial engagement in its preparation at the governance and senior management levels of the agency. There is mention of the draft document being sent to the major committees following the initial review by ENQA but no indication of their responses. The SAR shows no evidence of input from the committees, and this was confirmed in the panel's meeting with each of these committees.

The panel also asked the attendees from the Governing Board whom they met during the site-visit about their approach to implementing the recommendations of the 2019 report. Those who were members when the report was received believed it had been on the agenda of a meeting but had no recollection of any further follow-up. This was confirmed in the panel's examination of the minutes of Governing Board meetings.

The SAR provides a good summary of the day-to-day activity of the agency with a strong focus on compliance with procedures. The panel would have appreciated a section covering the agency's focus on enhancement. The SAR does not explore the relationship between mission, goals, strategy and outcomes.

Site visit

The site visit took place from 18th to 21st March 2024 and there was an on-line pre-meeting on March 5th and an in-person meeting on the eve of the site-visit.

The panel wishes, in particular, to thank Luis Velon, the ACSUG contact person for his very hard work and professionalism in organising every element of the visit. At its on-line meeting on March 5th, the panel met the Director of ACSUG, Eduardo Lopez Pereira and the ACSUG contact person Luis Velon.

Following introductions, the ENQA co-ordinator outlined the structure and purpose of a targeted review and explained that the purpose of the meeting was to give the panel an overview of the context in which the agency operates and to alert the panel to major changes (both internal and external) that had taken place since the previous review in 2019. The panel learned that elections earlier in the year had led to no major changes and that no major policy changes were expected to occur in higher

education. The agency has multi-annual funding in place up to 2026. For ACSUG the general context as described by the Director, is one of “familiarity and continuity”. The Director said the agency had good relations with the universities and the government and he added that the university system was likely to continue “as it had in the past.” The agency said there had been no substantial discussion on social and economic change prior to the election. It was anticipated that the merger of some under-subscribed degree programmes would be possible, and also noted that the government and universities had a procedure in place to do this.

The biggest change in the system over the 5-year period has been the creation of the new private university, Intercontinental University of Business (UIE) which had “eight or 9 degrees at present”, mainly in business and administration. The activity of UIE is seen as complementary to the work of the existing public universities and not really in competition with them. The panel was told that no issues had arisen when evaluators from the public system were used for evaluations in the private institution.

The panel asked if the ambitious goals for an inclusive, innovative university system outlined at the on-line Rome meeting of EHEA ministers had been considered by ACSUG and the system, to which the agency indicated that such matters were normally handled in the first instance by REACU, the Spanish Network of University Quality Assurance Agencies.

There had been some Spanish legislative change in 2021-2022 and this was now being incorporated in Galician legislation and guidelines on issues such as distance learning, boosting mobility, and sustainable development goals were being developed. Micro-credentials are now a topic in Spain and ACSUG is working with the universities on how to incorporate them in new degrees. The agency also said that guidelines for distance and blended learning are being developed by REACU.

The agency commented on the good working relationship among quality assurance agencies in Spain and explained that REACU also establishes working groups for different topics. ACSUG is the only agency legally allowed to operate in Galicia. It was explained that ANECA - The National Agency For Quality Assessment and Accreditation - was regarded as simply another Spanish agency which operated mainly in smaller regions that did not have their own quality assurance agencies. It was then added that, in effect, Spain operated like a federal state when it came to quality assurance agencies, and that REACU was now doing some thematic analyses and that ACSUG submitted data to this work.

In response to a panel question on the trend towards institutional evaluation in the EHEA, the Director said ACSUG supported this trend as it would reduce the level of duplication in the activity of the agency.

The agency undertook to check if ANECA had English language translations of the major legislation pertaining to higher education.

ACSUG said that the government was pushing for the inclusion of more practical elements and work-placements in degrees. In respect of currency of provision, ACSUG, it was stated, knows the opinions of stakeholders and sees what students think of their programmes in the documents of the universities. The agency outlined the work that was done in the past on labour market insertion studies and acknowledged both the gap since the last study and the gap in publication of data and analyses from the studies. ACSUG wished the graduates to be established in their careers before surveying them. The agency included a member of the relevant professional body on the panel of any programme that had professional accreditation.

On implementing the findings from its own panels, the agency said ACSUG created a summary of all the main findings and recommendations from its panels and shared these with the universities, but it was the agency opinion that “sometimes the responsiveness is slow” in the universities. ACSUG is

also encouraging the universities to have more stakeholders from professional bodies involved in their procedures.

In relation to the languages used on its website, the agency said its default languages were Galician and Spanish and that it has translated the guidelines for its international degrees into English. The panel was told that translation of the ENQA ESG 2015 into Galician (as suggested in the 2019 review) had been completed and a copy sent to ENQA the previous week.

The agency gave the panel an outline of its international activity. This concluded the meeting with the Director and agency contact person.

Following this online briefing, the panel agreed on a list of additional documentation to be requested from the agency.

The panel had an eve of site-visit in-person meeting on March 18th, 2024, in Santiago de Compostela. Agreement was reached on all the key issues and questions (aligned to the standards under review) that needed to be examined during the meetings. Chairing arrangements were agreed for each session. The panel also discussed in detail some of the gaps in their information. It was agreed that there would be a further check made on whether annual plans and reports were available. It had not proved possible to get any up to that point. The composition and terms of reference of the Advisory Council were also requested from the agency. As ACSUG documentation had pointed to some issues with attendance at meetings of the Governing Board, attendance records were sought for the previous year. The panel sought additional documents on the internal quality assurance system including its Q.A. manual.

The absence of annual activity reports for 2019-2023 and terms of reference for the Governing Board was noted.

The newly published Code of Ethics, available on the website, was discussed and there was general agreement that it was a good document that was fit for purpose and covered all the requisite areas.

It was noted that ACSUG published reports do not have the names of the evaluation panel.

The panel noted that legally ACSUG was a consortium of the government and the universities. The review panel spent some time exploring and considering the merits and potential drawbacks of this structure.

During the on-site visit to the agency over 2,5 days, a total 19 meetings were held, most attendees being in person, and a minority over the video connection. They enabled discussions to take place with ACSUG senior leadership and staff, members of the Governing Board, CGIACA, the new Review Committee, representatives of REACU, regional public authorities, heads of the HEIs in the system, heads of quality assurance officers of reviewed HEIs, reviewers' pool, stakeholders, and students. For a detailed agenda, please see [Annex I 00 Annex I Tripartite Targeted Review ToR ENQA ACSUG EQAR latest version](#). Additional evidence was requested during the site visit. For a complete list of documents received and used, please see [Annex 4. Documents provided by ACSUG](#).

The present report was drafted by the Secretary in close consultation with the rest of the panel. ACSUG had a possibility to comment on factual correctness of the draft. The report was also considered by the Agency Review Committee at ENQA.

CHANGES WITHIN THE AGENCY

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

In the SAR, ACSUG mentioned the establishment of a private university, the move to new premises, approval of the Code of Ethics, and the adaptations required to deal with the pandemic as the key events in the period under review.

The main change in the HE system between 2019-2023 was the formal establishment of the first private university in the system in 2021 with the creation of the Intercontinental University of Business (UIE) which has its administrative headquarters in Santiago de Compostela and campuses in the cities of A Coruña and Vigo. In Spain private universities are evaluated in exactly the same way as the universities in the public system so ACSUG has the same relationship with the new entity as with the three public universities.

The SAR also described how ACSUG dealt with the pandemic. Following the inevitable early adaptation issues, ACSUG published special evaluation protocols to allow for virtual evaluations. ACSUG returned to on-site evaluations in 2022.

Changes in the Spanish legal system pertaining to higher education had been enacted in 2021 and are in the process of being translated into Galician law. These changes updated the legislation in respect of the recognition of institutional evaluation procedures, recognised procedures for the evaluation of virtual and hybrid programmes and changed the cycle for Masters' evaluations from four to six years thus aligning them with bachelor and doctorate cycles. A new simplified procedure was also developed for dealing with minor modifications to programmes.

As is the practice now in Spain, these changes were first translated into national guidelines by REACU and then these are subsequently adapted by each regional QA agency for its own region.

No changes have been made to the method of appointment of the Director or the members of the Governing Board. No international members have been appointed to the CGIACA.

ACSUG'S ORGANISATION/STRUCTURE

An update on staffing in the agency since 2019 was provided in the SAR. This re-stated the difficulties in recruitment that had been outlined in 2019 and 2021 and the SAR shows that no essential change in procedures has taken place. Working within its procedures, two vacant posts were filled in 2019 and a third vacant post, though filled for a short time, is once again vacant. There has been some transfer of temporary positions to permanent (4) and a re-grading of some staff.

In respect of organisational change, a Review Committee has been established, and an international member appointed to the Governing Board. Further information on the Review Committee is provided in this report in the section covering ESG 2.7. The membership of both the CGIACA and the Advisory Council changed to conform with ACSUG statutes on rotation of members (terms of service for four years, re-election).

ACSUG'S FUNDING

There have been no changes made to the funding arrangements in place for the agency. ACSUG has multi-annual funding in place until 2026. This funding agreement is part of the structured funding of the university system agreed between the government and the university system. The ACSUG funding

is part of that structure and once allocated, ACSUG has complete discretion on how to spend it in line with requirements for public organisations.

More than 90% of ACSUG funding comes from this source. Some small additional revenue is generated by its international activity, but this activity is run on a cost-neutral basis.

The panel learned that ACSUG currently has a surplus of just over one million euro but that it is restricted in using that surplus. The panel was told that it cannot use this money to hire additional temporary staff or to outsource work. At the moment ACSUG is thinking of returning the money to the university system.

A meeting was included in the schedule where the specific focus was on funding and independence. At this meeting, the representatives from the ministry indicated that the process of appointing additional staff is a lengthy one and they also asked the panel to note the re-grading of staff. The ministry officials also spoke of the work of ACSUG on assessing responses to competitive research calls that are made at regular intervals. They also noted the “important” work of ACSUG in assessing applications for bonus payments by employees of the H.E. system. The Ministry officials accepted that the workload for ACSUG has increased. ACSUG states that the absence of flexibility on employment is the main reason why it has not addressed the issue of lack of progress on completing thematic analysis.

The Finance and HR function of ACSUG has put considerable work into getting staff in ACSUG re-graded, and in having some posts (four) converted from temporary to permanent.

The organisational structure has not been substantially modified and the 15 staff report directly to the Director - unchanged since the last review. (One post is currently vacant)

ACSUG’S FUNCTIONS, ACTIVITIES, PROCEDURES

The SAR lists the programme and institutional evaluations and accreditations carried out by the agency between 2019-2023. During the 2019-2023 period, all *ex-ante* accreditations of degrees had a favourable outcome. A monitoring process for programmes is in place, as required in the ACSUG legal framework, and the results of the monitoring process are tabulated in the SAR. In respect of existing approved programmes, a new modification guideline for “non-substantial” (minor) modifications was introduced in 2022 which allows for a desk-based evaluation of minor changes. Substantial changes continue to require a full *ex-ante* evaluation. Between 2019-2023, ACSUG evaluated the substantial modification of 105 degrees. Between 2019 and 2023, ACSUG renewed the accreditation of 112 Bachelor’s and Master’s degrees, visiting 187 centres of the Galician universities. ACSUG explains the very high favourable results of all these procedures as resulting from the process that allows for resolution of issues before the completion of reports. This was confirmed at meetings with panel members, presidents of the universities, QA managers of the Universities and staff of ACSUG.

The SAR outlines the processes used in the Galician system and the international activity of ACSUG: assessment of degrees done regionally and the same procedures internationally; FIDES-AUDIT in Galicia and internationally. Internationally, 23 processes of degree assessment were carried out between 2021-2023 and 21 of them had favourable outcomes. The SAR indicates that additional international evaluations under FIDES-AUDIT will take place during 2024. The composition of the external evaluation committees and the reports of the evaluations are placed on the ACSUG website. Notably, institutional accreditation and the DOCENTIA programme are only carried within Galicia.

In response to the flag under ESG 2.6 in EQAR's Approval of the Application by ACSUG for Renewal of Inclusion on the Register (dated 2020-03-18), the panel sought clarification on publication of negative *ex-ante* reports. As stated in the SAR, during the period of 2019-2023, all *ex-ante* accreditations were positive. There were ten negative decisions taken in relation to the monitoring of degrees (Bachelor, Master, PhD programmes) between 2019 and 2022; also, three non-favourable results of *ex-post* programme accreditation processes in 2019-2021. Negative reports could not be found on the ACSUG website. One negative report on accreditation of an existing programme (i.e. cyclical reaccreditation) was located on the DEQAR database; however, it came from the period covered by the previous ENQA review (accreditation decision of 2015).

Institutional level evaluations at university centre level are voluntary in the system and are called FIDES-AUDIT. This programme is divided into two parts:

1. The certification by ACSUG of the design of the Quality Assurance System (QAS) of a university centre. A favourable accreditation has "permanent validity".
2. The certification of the implementation of the quality assurance procedures.

The certification of the implementation of the QAS includes a site visit. If favourable, this has a 5-year approval that is extendable for a further five years, following a new external evaluation. From 2019-2023, ACSUG assessed 35 applications from university centres. The highest number received was in 2022 and 11 of the 15 assessments that year were favourable. One international university had its quality assurance system assessed in 2019 (San Martin de Porres University) and the SAR states that another in the Dominican Republic, Santo Domingo Technological Institute (INTEC) is expected to be assessed in 2024.

In order to be able to apply for institutional accreditation of centres, a university must possess renewed *ex-post* accreditation of at least half of the taught Bachelor and Master degree programmes and it must also have a valid certification of the implementation of its internal quality assurance system (through the FIDES-AUDIT programme). In 2018 a favourable certificate of institutional accreditation was issued to 24 centres, and these were confirmed by the Spanish Universities Council in 2019; three more were added in 2020 and a further three between 2021-2023. This initial process did not require a site visit. REACU is now designing the procedures that will be used for the renewal of the institutional accreditation of centres.

The SAR details the activities conducted under the voluntary DOCENTIA programme. There is a varying level of engagement with the programme. For example, the University of Santiago has not engaged with the programme since 2014, The University of A Coruña has made six calls for implementation of its procedures between 2018 and 2023, and the University of Vigo made three calls for implementation between 2017-2023.

The SAR outlines the activity of the agency that is not within the scope of this report, and it details a high volume of activity in relation to teaching staff accreditation and bonuses. In respect of labour market insertion studies, the only labour market insertion study carried out was of the population graduated in the 2014-2015 academic year. ACSUG is also engaged in the evaluation of research groups and projects and pre- and post-doctoral fellows. The SAR states that ACSUG collaborated in the assessment of more than 3000 applications of research activities. While recognising that this activity is outside the scope of this review, it is important to note its scale when considering the work of the agency.

In respect of each of the standards being considered in the targeted review, the SAR outlines the previous finding and states the current status of the recommendations.

FINDINGS: COMPLIANCE OF ACSUG WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

2019 Review Recommendation

The 2019 panel concluded that ACSUG was "Fully Compliant" with this standard. That panel commended ACSUG for "the strong influence of ACSUG activities across the SUG, recognised by all the stakeholders as seminal for ensuring quality in universities." and added, "The international activities of the Agency are very valuable and much appreciated by the foreign universities involved".

The 2019 panel made suggestions for further improvement:

1. The panel suggests ACSUG might consider taking actions to stimulate universities to take a whole-of-institution perspective on quality assurance, devising appropriate methods for external evaluation of the effectiveness of implementation of such a perspective.
2. The panel suggests including a strategy for all activities of ACSUG in the Strategic Plan, also the international evaluations and collaborations.

EQAR concurred with the judgement on ESG 3.1 in 2019.

In the 2021 follow-up report, ACSUG did not respond to the suggestion about including "a strategy for all activities" in the strategic plan but did state "Nevertheless, in the new Strategy 2021-2025, ACSUG is going to remark its compromise (sic) with the internationalisation and the procedures to put in practice in this field."

The panel, having considered the totality of its current review of ACSUG, including its site-visit, the SAR, the website, the additional documentation requested, made a decision to include this standard in its report. In arriving at this decision, the panel took into account what it had learned through an examination of the records of the ACSUG committees, its interactions with internal and external stakeholders, the meetings with the committee members and staff and management of the agency. The panel attempted to get as full a picture as possible of the strategy of the agency and of its translation into work-streams with identifiable objectives and measurable outcomes. The panel was cognisant that the strategy in its broadest sense is enacted and manifests itself in tandem with governance structures, internal communication and internal organisational culture and is not necessarily entirely to be found in a formal agency document. However, it was clear that the agency departed from its own plan to

develop the strategy for the next planning period to allow smooth transition from one strategic planning period to another one, and also did not take on board the 2019 ENQA panel suggestion for improvement to produce a strategy for all activities with international ones included. This was seen by the panel as a major development in terms of how the agency organised its work compared to the situation five years ago, which called for better understanding of what was happening, and thus, delving deeper into ACUSG's alignment with the expectations under ESG 3.1. Eventually, having carefully taken into account the guidelines for Targeted Reviews, the panel decided to include this additional standard in its report. This decision was taken in order to strengthen the enhancement focus of the review.

Evidence

The SAR refers to ACSUG's aim to enable the Galician University System to achieve "prestige and recognition" within the context of the university education in Spain, Europe and worldwide. ACSUG conducts regular activities both at programme and institutional levels and the clear statistics both regarding the volume and outcomes are presented in the SAR. Stakeholders are present on the Governing Board (total 25 members), CGIACA (total ten members), the Review Committee (total 4 members, but no student member), and Advisory Board (total 11 members); their composition is published on the website.

The panel paid particular attention to the mission and vision of the agency and how its goals and objectives translate into the daily work of the agency and how this all is made public. At the very first online meeting, the panel noted the absence of any reference to a current strategic plan in the SAR, although the document did include reference to work commencing on a "new" strategic plan. A search of the website also failed to find a plan, or any annual plans and reports linked to such a plan. In light of the comment from ACSUG in 2021 about a "new strategy 2021-2025" in the follow-up report, this panel sought clarification. The contact person confirmed that ACSUG did not have a strategic plan. The panel also sought minutes of the Governing Board meetings and again could find no reference to the plan mentioned in 2021.

At the panel's meeting with the Director, he confirmed that ACSUG had not put any strategic plan in place to replace the one that expired in 2020. He stated that the agency was too occupied with its plans for moving premises and then with the work required to deal with the pandemic to do any work on strategic planning. When asked about whose responsibility it was to develop, implement and monitor a strategic plan - linked to the mission of the agency - he stated that this was work to be undertaken by "staff" of the agency. He added that ACSUG had, throughout this time, continued to implement any outstanding parts of the earlier strategic plan but agreed that no evaluation of the 2016-2020 plan had been conducted.

The Director said that work had commenced on a new strategic plan and that an external consultant (a recently retired university professor who had also been involved in developing the 2016-2020 plan) had been retained to develop the new plan. He added that "it would be very interesting to have a strategic plan." He suggested that they needed more staff if they were to undertake strategic planning and mentioned that their work in Central and South America was one of the reasons they did not have staff time available for work on the strategy. He also pointed to the volume of work undertaken by ACSUG in respect of teaching bonuses and research funding allocation - work they are required to do by the Ministry - as limiting their time for work on strategy. He then added that ACSUG had devoted a lot of time to getting staff regraded and that this was also a contributory factor. With regard to work on a new strategic plan, he said a draft has not yet been made available to the Governing Board or other managerial committees and added that he had "a general idea" of its contents.

When asked about the suggestion in the 2021 follow-up report that activity be linked to strategy, the agency did not have a response, and the panel noted that no particular employee had been designated for that task. The members of the panel read the early draft of the strategic plan 2024-2028. This document does not have any status in the agency as it has not been considered or adopted by the Governing Board. In that context, the panel will confine its observations to the evidence gleaned from the document about the period under review. As in the SAR, the draft document suggests that the move to new premises and the pandemic account for the absence of a current strategic plan. It lists achievements of the agency as its move to new premises, the re-grading of staff and the scale of international activity. It identifies the same list of weaknesses as appear in the SAR. It also makes clear that no consultation had taken place with internal or external stakeholders in advance of preparing this draft but does state an intention to do so.

Of interest to this review is the stated aim in the SAR and in this draft document (transferred from the previous strategy) that ACSUG be a *“benchmark in the field of quality assurance in higher education, both at regional, national and international level”* and its ambition, also stated in the SAR to maintain as a top priority its *“participation, involvement and consolidation”* in bodies such as ENQA, EQAR, INQAAHE, and ECA. It mentions as an *“operational objective”* the need to *“redefine the indicators to provide information on the effectiveness and efficiency of different processes”*. The panel sought the documentation on existing indicators but was told that there was no such documentation. This draft plan also mentioned the absence of *“operating regulations”* for some key bodies and this was further examined by the panel. It was confirmed that no operational guidelines exist for the Governing Board.

Encouraging the involvement of the institutions represented on the Governing Board in the *“planning and development of the agency’s activities”* is another objective in the draft strategic plan. This was explored by the panel at its meeting with members of the Governing Board. The panel was particularly interested in teasing out the role of the Governing Board in the strategic oversight of the agency. The Governing Board members confirmed that they had not been given a copy of this draft strategy nor consulted in advance of its development. They confirmed the absence of a strategic plan and any statement of goals and objectives linked to its mission.

For the period under review, there are no annual work plans linked to strategic objectives. The review panel was told that annual work plans did exist so the review panel asked for documentation on them on a number of occasions. The panel was supplied with a series of documents during the site visit that were described as *“Annual work plans”*. However, these documents contained simply a listing of planned procedures and had no linkages to the goals and objectives of the agency or to its strategy. There were no plans of other activities which would operationalise the objectives of the agency. The Chair of the Governing Board said that each year in December there was a review of the year’s activity. The Chair also said that the staff had too much work and that might explain the absence of a strategic plan. The agency website has no annual reports. The attendees from the Governing Board were not aware of the absence of annual reports on the website. They confirmed that the Governing Board was not involved in the decision not to prepare a strategic plan in 2021.

The heads of the universities in the system are members - with voting rights - of the Governing Board. At its meeting with the heads of the universities in the system, the longest serving president said he had no recollection of a strategic plan ever being discussed at the Governing Board and suggested that this was work done at *“another level”* in the organisation. When asked to comment on the work of the Governing Board he suggested that it approved staff contracts and whatever activity was planned for the following year. He added that the universities were satisfied that ACSUG was doing its job well in evaluating programmes and he saw no need to change that.

At a meeting with staff of the agency, it was confirmed that no annual reports had been prepared since 2017. Bi-annual activity reports were prepared for the Governing Board, but these are not linked to any metrics or strategic targets, but account for numbers and outcomes of procedures. Examples of these reports were examined by the panel. They list activity over the previous months and include summaries from the Internal Management System. In one such report dated 18 December 2023, the panel found a brief mention that ACSUG was conducting a review of fulfilment of ACSUG's Strategic plan 2016-2020 with the objective to identify those actions which would be relevant for the design of the next strategy to cover the period 2024-2028, and to be presented for the Governing Board for approval and also for the Advisory Council's next meeting, if appropriate. The panel has not been provided supporting evidence attesting that those intentions were ever completed or that there was considerable progress towards this aim.

The panel also learned from the staff that the work plan for the following year is generated based on the chronological requirements of the monitoring and evaluation procedures. The panel has access to the documents entitled "planificación actividades XXX", which are internally labelled as annexes to the minutes of meetings. The documents cover the planned activities for years 2020 until 2024. The information includes the type of activities, the approximate date and some observations mainly related to the confirmation of such activity, the different steps of the activity or the institution being evaluated, among others. The panel identifies a lack of proper work planning in these documents that do not include any allocation of specific tasks, responsibilities or resources, nor an overall analysis of the weight of the different tasks and their impact in the daily work of the agency nor the strategy.

With regard to the management of web-site content, the ACSUG staff said there was no one person responsible for ensuring that the content of the website conformed with reporting requirements. They confirmed that each technical area decided itself what to submit for posting to the website. They acknowledge that there are gaps in what is posted, including in respect of annual reports. They added that no one person or unit has responsibility for ensuring that the web-site content covers areas such as the publication of the agency's strategy and annual reports. Uploading material is done by the IT and administrative staff but they have no editorial role.

At its meeting with the Secretary-General and Deputy General Secretary of the University system, who both have a considerable number of years in service, the absence of strategy was again a focus of discussion. They stated that there was a global plan for the development of the university system in Galicia, but they did not see the absence of a strategy for the agency as a matter of concern. However, they acknowledged that the international reputation of ACUSG - both within Europe and Latin America - was very important. They were asked about the influence of ACSUG on the system and suggested that its role in determining bonus payments was significant. They were unaware that there was an issue about the absence of thematic analysis. They were asked about the place of ACSUG in the regional strategies for higher education and they said ACSUG played a part in the regional strategy for qualifications and in determining bonus payments for university staff. They confirmed that work on the incorporation of the United Nations sustainable goals in regional strategies had not taken place.

The website does have a clear statement of the mission, vision and values of ACSUG. Its mission statement includes a commitment to "*transferring relevant information to society at large about the activities carried out and their results, ensuring that the SUG (university system) is constantly adapted to the social and economic situation*". The panel can confirm that ACSUG does publish the outcomes of its evaluations and also noted the reference in the SAR to the publication of data and analyses related to the labour market insertion surveys. The website, however, did not have any data on surveys carried out since 2017. The Director confirmed that no surveys took place after that date. At its meeting with external stakeholders, the panel learned of long delays in publishing analytical material connected to the last

survey in 2017. The student member of the CGIACA was one of a number of attendees who suggested that ACSUG needs to do more to make the public aware of its existence and function. He also said that many students and professors did not know of its existence or function. Other student attendees confirmed this view. At its meeting with REACU, the attendees said that all Spanish agencies have an issue when it comes to communicating with broader society. Again, at its meeting with external stakeholders, some attendees raised the weak public profile of the agency and the difficulty created by the absence of transparency on the data used to underpin decision-making in the system.

The vision statement refers to the ambition of ACSUG to be recognised as “*an agency of demonstrated quality and efficiency.....based on national and international standards for higher education quality assurance.*” The panel raised the issue of “national and international standards” at its meetings with the Director, the heads of the universities, the quality assurance officers of the universities, the ACSUG staff working directly on quality assurance, the reviewers used by the agency, REACU and some of the external stakeholders. The Director and staff referred to the role of REACU in informing the system, the involvement of ACSUG in INQAAHE and the participation in international reviews. He could not refer the panel to any international comparators used in evaluating its own performance and how would the agency otherwise know where it was in relation to the national and international standards. The Governing Board attendees also had no knowledge of nor had they been briefed on any indicators developed by ACSUG to assess its own performance in relation to “obtaining an excellent assessment” from ENQA and EQAR as was stated both in the strategy of 2016-2020 or in the draft strategy of 2024-2028 or other content related issues.

International work has continued during the period 2019-2023, mainly in Central and South America. In 2018, ACSUG was authorised as an accreditation agency for university degrees in Peru. ACSUG does not conduct *ex-ante* accreditations for HEIs outside Galicia and its *ex-post* accreditations are only conducted when there have been at least two cohorts of graduates. ACSUG uses the same procedures for *ex-post* accreditations abroad as it does in Galicia, including both a desk-based stage and a site-visit. During the five-year period under review, ACSUG undertook 23 international *ex-post* accreditations and 21 of them received a favourable report. However, not all reports for re-accreditations from the international evaluations could be found on the website.

ACSUG has also started to implement the FIDES-AUDIT programme in its international work. In 2019, the design of the Quality Assurance System of the San Martin de Porres University (USMP) was certified, and the university continues to be a client of ACSUG. In The Dominican Republic, The Santo Domingo Technological Institute (INTEC) is currently receiving assistance and advice on how to design its quality assurance system.

The technical staff told the panel that ACSUG receives more requests than it can handle to undertake international work. The Quality Manager said that they decide what work to accept on the basis of the availability of staff time and a check on the “reputation” of the applicant. On one occasion, the Advisory Council made an analysis of applicants and suggested which should be prioritised. The technical staff said that the Director sets the specific tasks for each member of staff for all activity, including international activity.

The guidelines for ESG 3.1 state that when agencies carry out other activities, a clear distinction must exist between the agency’s work in external quality assurance and its other activities. The panel examined the nature of the work carried out by ACSUG in Central and South America and became aware that in at least one instance, ACSUG appeared to have a contract for consultancy with an organisation, Santo Domingo Technical Institute (INTEC), where it also proposed to carry out an external evaluation. The panel asked for both contracts and when examined, it became apparent that ACSUG had signed a contract to provide advisory and consultancy services to an institution where it

had also entered into a contract to carry out an external evaluation at a later date. The panel met the President of The Santo Domingo Technological Institute (INTEC) in his capacity as a member of the Advisory Council. He confirmed that his institution was getting advice from ACSUG on how to develop its quality assurance system and said that he anticipated that INTEC would apply in the near future to ACSUG to have that system accredited. The Director confirmed to the panel that this was being done under a consultancy contract.

The panel had access to two agreements between ACSUG and INTEC:

- A memorandum of understanding (MoU) that, despite its general character, specifies that “The purpose of this agreement is to establish a framework principle of collaboration between INTEC and ACSUG to influence the quality assurance of INTEC, through the implementation by ACSUG of evaluation processes of INTEC centres and degrees. The specific evaluation activities will be established in specific agreements that are agreed upon and that will come into force once approved by the parties.” (Convenio Marco de colaboración entre el consorcio Axencia para a Calidade do Sistema Universitario de Galicia y el Instituto Tecnológico de Santo Domingo”, January 25th 2023).
- A specific agreement on the “Advice on the design process of the INTEC quality assurance system (QAS)”, that refers to the previous MoU with undefined date of signature (but obviously posterior in time to the MoU). The document is entitled “Convenio específico de colaboración entre el consorcio Axencia para a Calidade do Sistema Universitario de Galicia y el Instituto Tecnológico de Santo Domingo para el asesoramiento en el diseño de un sistema de garantía de calidad”. The agreement establishes the panel composition and financial regime of the activity described as “ACSUG and INTEC agree to carry out joint actions, with the objective of carrying out the following activities: 1) Advice on the design process of the quality assurance system (QAS) of INTEC”.

In view of the general MoU and the related specific agreement it seems apparent that the relationship between ACSUG and INTEC plans to involve both consulting on the development of the QAS and the concurrent or posterior evaluation of centres and degrees (to be eventually established by future specific agreements). The panel is aware that this kind of situation should be particularly avoided as per expectations of the EQAR and thus needs to be swiftly addressed by the agency.

Analysis

ACSUG works as an external quality assurance agency continuously. Activities are done regularly and stakeholders are represented in the agency’s bodies, so these parts of the standard are clearly satisfied.

The decision to include this standard in the report has its origins in the absence of a current strategic plan linked to vision and mission and detailed annual work plans and reports linked to this strategy. Further examination revealed a very weak linkage in ACSUG between its stated mission and its activity beyond evaluation procedures. In attempting to understand why this had occurred, the panel became aware of both cultural and structural weaknesses in ACSUG that created concerns.

The concern of the panel was not shared by the attendees from the Governing Board, the heads of the universities nor the Galician Secretary General for Universities nor the Deputy Director for Universities. The universities are satisfied with the work done by the agency in evaluating programmes and did not express reservations about the lack of strategic direction, the absence of any internal alignment of goals and objectives with the strategy and the absence of any framework of metrics for assessing the agency’s own performance. The staff of the agency do not see the lack of a strategy as impeding their daily work and described their organisational role as effectively operating without need for a strategy. The panel can understand the attitude taken by the staff because there does not appear to be any substantial effort or attempt being made at leadership level to engage with what should be the enhancement focus of a mature agency. It is noteworthy that the ministry and university

stakeholders appear to place more value on the work done by ACSUG in assessing bonuses and research funding applications (which fall outside of the scope of ESG) than it does on the agency's role as the sole organisation charged with the external quality assurance of its higher education system.

As currently constituted and operating, the Governing Board seems to play no significant role in the strategic oversight of the agency. It does receive detailed lists of the procedures that have been implemented so its focus appears to be on operational compliance. This is also evident in the lack of direct leadership involvement in strategy development, implementation, monitoring and evaluation.

Repeatedly, the panel was told in the SAR and at many meetings that there were not enough time or people to work on strategy. The panel does not doubt that the staff of the agency is fully occupied doing the reviews and that it does them very well. However, as a mature agency it may now be timely for ACSUG to develop to a culture and architecture that would support strategic thinking and planning. A strategic focus is not currently prioritised in ACSUG, thus, the potential of the agency would be enhanced by developing in this direction.

The weak link between mission and activity is exemplified in the failure of ACSUG to resume any substantial stakeholder engagement meetings in terms of enhancement led activities that would align with the core mission of the agency. Formal meetings to handle applications have resumed post the pandemic. Again, the panel was told that this cessation of stakeholder engagement resulted from lack of staff and the move to new premises. In the view of the panel, this merits re-consideration. What is required is a prioritisation of activity that aligns with its core mission, and consistent efforts to achieve one's goals.

The panel supports the agency's ambition to be "excellent". And there is evidence of excellent work being done in programme reviews. The universities have confidence that ACSUG does its work well, this was attested to by both the Heads of the HEIs and the quality managers. This concentration on process may have resulted in a weakness in its developmental and enhancement role in the system. The targets and metrics required to achieve excellence need to be identified and adopted at all levels in the agency and this has not happened during the last five years. ACSUG has worked with REACU on national guidelines, but its own documentation does not show that it has examined the work of international agencies to establish the comparators by which it might evaluate its own performance. ACSUG staff do participate in working groups in REACU that deal with developing national guidelines and staff have contributed to some work on thematic analysis with other REACU members. ACSUG could use this valuable experience to contribute to developing its own thinking and processes. The panel also noted the desire of ACSUG to have a stronger profile in its region. A strategy associated with specific objectives on regional engagement is an area that merits further consideration. The agency has a very patchy system for engaging with wider society and the presence of the representatives of the university social councils on the Governing Board is not an adequate structure for external engagement. It is understandable that the pandemic interfered with the organisation of public events but these need to resume at speed both in person and on-line. A programme of activity should be agreed with the universities and every effort should be made to work together to build a much broader engagement with society. If ACSUG is to be a valued part of the regional strategic development, it must itself have a clear strategic focus and a clear sense of its own identity. This identity must reflect the broad mission of higher education in the economic, social and cultural development of its region and in enhancing the life opportunities of the people it serves.

ACSUG is aware of the absence of an editorial responsibility for the website and might now address this in the context of ensuring that it is an effective two-way communication instrument. The absence of a strategic plan may weaken the capacity of ACSUG to systematically analyse its own performance, to measure its performance against good practice elsewhere (both within Spain, and also, importantly,

internationally) and to set ambitious but achievable targets for its future in order to fulfil the agency's mission and vision. There is evidence of capacity both inside ACSUG and among its stakeholders to undertake this type of analysis.

The emergence of a conflict of interest in the work of the agency with INTEC came to light accidentally and this panel was not in a position to examine in detail all the contracts for consultancy carried out by ACSUG in Central and South America. What did become apparent in discussions with the agency was that there were no clear guidelines on conflicts of interest for its consultancy work. Nor did ACSUG appear to see any issues in acting simultaneously to provide consultancy and evaluation services to the same entity. An immediate review of all consultancy work undertaken by ACSUG in Central and South America is now needed in order to establish if any further conflicts of interest arise from ACSUG simultaneously engaging in consultancy work with an entity where it will also have a role as an evaluator.

To sum up, the panel's judgement on ACSUG's compliance to ESG 3.1 is determined by several primary factors. First of all, absence of the clear leadership and implementation of responsibilities over strategic planning, and discontinuation of strategic planning efforts - thus, deterioration of the agency's situation compared to the one five years ago was established. Patchy yearly planning and likewise reporting on work (not including holistically all activities that contribute to the fulfilment of the agency's mission) are also noted. Secondly, the panel strived to verify their thinking and align with judgments of other agency reviews, thus took effort to acquaint themselves with ENQA panel reports of all targeted reviews completed to date since 2022 and also EQAR decisions, to see if its thinking aligned with precedents of the past. A very clear trend emerged: agencies either had strategic and yearly plans, or were in the process of their drafting, and absence of these was invariably noted both by ENQA panels and the EQAR's RC in their decision making. Thus, the strategic planning accompanied by yearly planning emerged as the most effective instrument to translate the goals and objectives into the daily work of any agency, no alternatives were spotted. Thirdly, the panel considered no clear separation between the agency's consultative services and evaluation activities being at odds with expectations of ESG 3.1 and *Use and Interpretation of the ESG*, and took notice that such a misalignment resulted in critical decisions and partial compliance judgement by the EQAR's RC on two occasions.

Panel commendations

Agency staff is dedicated to excellent implementation of evaluation and accreditation procedures.

Panel recommendations

1. The panel recommends that ACSUG develops strategic goals and objectives with accompanying metrics, targets and timelines, and consolidates this into a medium-term strategy.
2. The panel recommends that the leadership and governance structure and responsibilities in ACSUG be clarified in order to create a matrix of responsibility for strategic planning and implementation.
3. The panel recommends that ACSUG develop a clear protocol on the separation of consultancy and accreditation procedures and publishes it on the website.

Panel suggestions for further improvement

1. The panel suggests that ACSUG produce annual reports that are linked to its mission and strategic goals and make them accessible to the public. Such reporting would help promote the internal reflection and improvement and increase transparency and contribute to better recognition of ACSUG's work.

2. The panel suggests that the terms of reference and operational guidelines of the Governing Board include specific reference to the role of the Governing Board in overseeing and monitoring the strategic plan of the agency.

Panel conclusion: Partially Compliant

ESG 3.3 INDEPENDENCE

Standard:

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

2019 review recommendation

The 2019 panel report recommended a judgement of “fully compliant” for ESG 3.3. This was amended to **Substantial Compliance** by the Board of ENQA. EQAR then modified the judgement to **Partial Compliance**.

The 2019 panel made three suggestions for further improvement:

- *“The panel suggests setting procedures for the selection of the Director of the agency, president of the Governing Board and president of the CGIACA based on professional competence and prior experience.*
- *The panel suggests putting procedures in place in order to cover personnel vacancies independent from the public administration on a temporary basis, until staff positions are created and filled through public procedures.*
- *The panel suggests appointing non-Galician members in all the agency’s governing and evaluations bodies, this could be a way to further enhance ACSUGs’ independence.”*

The Board of ENQA, in its letter of 1 October 2019 repeated under its commentary on ESG 3.3 that: *“ACSUG is recommended to appoint non-Galician members in all the agency’s governing and evaluations bodies, which would be a way to further enhance ACSUGs’ independence.”*

The EQAR Decision on the Application of ACSUG (16/03/2020), in a detailed commentary on this standard concluded that: *“Considering the close interlinkage between ACSUG and the Galician government, the Committee could not follow the panel’s judgement of (full) compliance, and concluded that ACSUG complies only partially with ESG 3.3.”*

EQAR, while welcoming the intention of ACSUG to appoint non-Galician members to the Governing Body and to the CGIACA did not see this as a sufficient guarantee of independence. EQAR also noted that it welcomed the involvement of the government as a stakeholder but added that *“the current organisational arrangements does not guarantee clear and sufficient safeguards to prevent the possible interference of the regional Galician government in ACSUG’s governance.”*

In 2021, ACSUG produced its follow-up report including comments on the recommendations made in 2019. This follow-up report confirmed that no changes had been made to procedures for appointments to the positions on the grounds that the procedure was established in ACSUG’s statutes. In 2021 there were no non-Galician members on the Governing Board nor on the CGIACA. No change had occurred in the methodology used for filling temporary appointments and ACSUG repeated its 2019 position that it could not fill vacancies outside the procedures laid down for filling vacancies in the public service.

The Terms of Reference of this targeted review listed ESG 3.3 as a focus area for the following reason(s): *“the direct involvement of the Galician Government in the appointment of the majority of members in the agency’s Governing Board, in the appointment of president of the Governing Body, the president of the agency’s decision-making body (CGIACA), the Director of the agency and the president of the Advisory Council.”*

Evidence

At its initial meeting this panel was briefed on the terms of reference for this targeted review and noted the particular emphasis placed on this standard.

The SAR, while acknowledging that no change had taken place in the procedures for appointing to the key positions, reiterated its position from 2019 and 2021 on the operational independence of ACSUG. It also noted that an international member had been appointed to the Governing Board. In respect of the CGIACA, it said that there were difficulties in appointing international members to this body because members had to be available at short notice for meetings and there were also difficulties in sourcing international members because of language issues. The President of the CGIACA also cited the need for members of this committee to understand the regional context as another reason for the absence of international members. The panel checked on whether it was possible to attend these meetings remotely and learned that, though it is possible, the preference is for in-person attendance. It was also suggested by attendees from the CGIACA that as no fee is paid for membership of the committee, that this might deter potential international members. The panel established that expenses are paid.

The panel had detailed discussions on this issue with the Director, the Governing Board members and the attendees from the university system. One Ministry official was in attendance for part of the meeting with Governing Board members. (He is a member of the Governing Board). The Director confirmed that there was no call for applications for any of these posts and that appointees were selected by the regional government on the basis of what was described (in the SAR and at the meeting) as “prior experience and professional competence”. The periods of service for the Governing Board are unlimited in the case of members nominated by institutions. Members who are not members by virtue of their position (six members) may also be re-appointed after four years. Student members are appointed for two years, extendable once. Members of the CGIACA are appointed for four years (two in the case of students) and can be renewed; every two years half the academic members are renewed. Review Committee members are appointed for four years and can be renewed once. The Director is appointed for four years and can be re-appointed without limit.

The panel asked to see the written criteria used in respect of these appointments. No written documentation was provided. The current Director was asked originally by the Minister if he wished to be appointed to the post and, at four yearly intervals, he has been re-appointed. He was originally on a leave of absence from his university and when he retired from the university he was asked by the minister if he wished to continue in his post in ACSUG and he indicated that he wished to continue. The Director said that ACSUG had not appointed international members to the CGIACA because its meetings often take place at short notice but, when questioned on this, agreed that international members could be accommodated remotely at a hybrid meeting.

The Governing Board has 25 members, including the regional minister of Education, Science, Universities and Vocational Training; the general secretary of Universities (which is the highest official within the Ministry overseeing the SUG); all four rectors of SUG and vice-rectors as well; three chairs of the Social Councils from the affiliated universities; four members proposed by regional ministries; two student members; 20 of members have voting rights. ACSUG Director is a member of the Governing Board with voting rights. The secretary of the Governing Board is ACSUG’s staff member,

a public employee, who can attend the meetings and may speak, but not vote. Composition of the Governing Board is announced on the agency's website. The Chair confirmed that she had been appointed by the minister. There was no formal application procedure and no written criteria for the post. She stated that appointees were selected on the basis of their "background, considering prestige and academic achievement". The Chair of the Board has been a member of the Board for 15 years. The Chair of the CGIACA has been chair of this committee for ten years and was appointed by the Minister, on the recommendation of the Governing Board. In relation to other members of this committee, they are selected by the Governing Board and approved by the President of the Governing Board. The term of appointment for members is four years, with the exception of the chair. The agency underscored that in practice in CGIACA rotation does take place and evidence of this was provided to the panel. When asked about the absence of international members on the CGIACA, the chair said that he felt it would be difficult for international members to "understand the local context" and added that any potential international appointees would need "a lot of local knowledge".

The panel noted that ACSUG Director is a member with voting rights on the Governing Board; and a non-voting member in both CGIACA and in the Advisory Board.

The panel also sought confirmation from other attendees that no change had occurred since 2019 in connection with filling vacant posts. The Director, the Galician Secretary General for Universities, the Galician Deputy Director of Universities and the Head of Finance repeated the position outlined in 2019 that it was not possible for the agency to fill temporary positions.

The SAR states that the operational independence of ACSUG from the universities and the regional government is guaranteed in its statutes. In particular, it emphasises that the work of the CGIACA is done without any external interference (including appointment of review panels) and that the decisions taken by the evaluation panels are always accepted. The student reviewers were asked how they became part of the panels. They explained that they were approached directly in their universities by one of their professors and asked to participate. The staff of ACSUG were also asked about this procedure and said that this was the usual method of identifying student reviewers although they had recently got two reviewers through the Spanish student representative body. All attendees said that there was no interference with their decisions. The panel checked that the evaluators it met were satisfied that their conclusions were accepted without interference. They said that they were satisfied that this was the case. In discussing the details of how the evaluation panels do their work, this panel looked at the work of the disciplinary committees established within ACSUG to ensure standardisation of outcomes between panels. In addition, the universities have an opportunity to scrutinise the preliminary reports and may seek to clarify findings or the seek change to factual errors. These disciplinary committee members are selected by ACSUG and there is no application procedure. There is no term limit on membership. The CGIACA then considers the recommendation from the (standardised) reports. The Chair of the CGIACA said its decisions are "normally" made by consensus and that during his term as member and chair it has always made its decisions in complete independence. In the event of any disagreement, a decision may be deferred to the next meeting in order to allow for further information/clarification. The panel members are asked to alert the chair to any potential conflicts of interest and must excuse themselves from participation in any decision in which they might have a material interest. The panel also checked on the procedures in place to ensure that members of evaluation panels do not have any conflicts of interest. They said they understood this was done by the staff who then sent a list of names to the CGIACA from which a panel was then constituted.

The panel also learned of the procedures used by the HEIs to have a new degree proposal recognised. In the first instance, the approval of the Galician or Spanish Ministry is required. The decision to

implement any official degree in Galicia is the responsibility of the regional government. If the proposal is accepted, then the process of evaluation and accreditation is undertaken by the QA agency - in this case ACSUG. In the case of a successful *ex-ante* accreditation, the Ministry then gives the official recognition and adds the new programme title to its official register. HEIs do sometimes commence a programme as a “private” degree (*titulos propios*) in advance of the *ex-ante* accreditation but it does not have official recognition until the completion of the evaluation process.

The CGIACA decisions are all transferred automatically to the Ministry and then appear on the Ministry published list.

Analysis

The ENQA guideline for this standard specifies the tripartite criteria on which this standard rests: organisational independence, operational independence and independence of outcomes. The panel sought evidence on each of the three dimensions of independence.

The SAR repeated the position advanced in 2019 and 2021 that the agency was independent because it has operational independence. It does not consider the other two dimensions. The panel sees that the agency functions in a small and tightly knit community. The two highest officials of the Ministry and all four rectors of SUG are present on the Governing Board with voting rights, vice-rectors are present without voting rights. The Director himself is a member of agency bodies, thus, lack of consideration of all aspects of independence is even more worrying. Nothing has changed since 2019 in the procedures used to appoint the Director, the chair and members of the Governing Board and the chairs of the CGIACA. The role of the Ministry in formalising appointments has not been modified. The original establishment of ACSUG created a consortium involving the Ministry and the universities of the system. This has continued without change. An opportunity existed to introduce change when the legal requirements to establish the private university were enacted. The Director, when questioned on why the statutes had not been amended at that time, did not have a response.

The budget for ACSUG comes through the multi-annual allocation to the university system. The universities are satisfied with this arrangement and ACSUG also sees much merit in the present model. However, there are negative repercussions as well which need to be considered. An organisation that can make no effective decisions on how to utilise its budget to employ the human resources it requires to deliver its mandate is operating with limited autonomy. In 2019, the panel suggested that ACSUG look at using its budget to get temporary staff. ACSUG refers to the difficulties in doing this because of the constraints of the public procedures for employment. Again, this does not speak to an entity that could claim it has operational independence. It should be noted however that ACSUG on a number of occasions in the last five years was able to employ consultants for specific purposes. This was done for example to develop the new code of ethics. In the view of the panel, it is difficult to understand how it was possible to commission this piece of work but not commission, for example, work on thematic analysis.

On the outcomes of its evaluations, the panel is satisfied that the CGIACA operates without interference and that its decisions are made independently. The Ministry does publish a list of approved programmes in the official gazette and the panel found just one example of an *ex-ante* approval not subsequently appearing in the gazette. This occurred when the regional government did not make funding available but the approval decision made by the CGIACA remained intact.

The procedure used in Galicia to have a new degree registered for the first time is mirrored in the rest of Spain. The initial permission to commence a new degree is given by the Ministry but it does not become part of the official register of programmes unless it successfully completes the *ex-ante* accreditation with ACSUG. The panel does note, however, the practice of commencing some

programmes while awaiting the completion of the evaluation and accreditation, which has negative repercussions for recognition of such degrees abroad.

The agency took a limited approach to the suggestion that international members be included on the main bodies. The original recommendation referred to more than one international member on each committee. It is not in the spirit of independence to simply place one individual on the Governing Board and none on the CGIACA. The Advisory Board does have international members and this is welcome but this committee has a peripheral role in the life of the agency. The totality of the response to this recommendation from 2019 and 2021 is weak and does not send a clear message about the value of independence in the culture of the agency or the Galician higher education system.

As Spanish is one of the widely spoken languages both within Europe and further afield (including in expatriate communities), the panel is not persuaded by the argument that a language issue impedes participation in the CGIACA. In addition, ACSUG showed its capability to conduct its meetings on-line during the pandemic, so the agency is well-equipped to organise hybrid or on-line meetings of the CGIACA at short notice.

Throughout the visit, Statutes were constantly referred to as a decisive limiting factor in organisation of the work by the agency. The panel notes that ACSUG failed to use the opportunity they had to amend the Statutes when the first private university was created. As a matter of priority, ACSUG should put in place efforts to reopen the question and address the issues of independence in substance.

Panel commendations

1. The panel commends the manner in which the review panels operate with complete independence.

Panel recommendations

1. The panel recommends that procedures for the appointment of the Director, the Chair and members of the Governing Body, the Chair of CGIACA and the Chair of the Advisory Council be put in place that are based on well-established principles guaranteeing the organisational independence of ACSUG with real rotation of membership in all bodies, clearly separating roles and responsibilities, to assure no interference from third parties, including the government and universities.

2. The panel recommends that ACSUG engage with the Ministry and SUG with a view to amending (if required) any legislative impediments to utilising its budget to contract in necessary human resources.

Panel suggestions for further improvement

1. The panel suggests that international members are appointed to all bodies of ACSUG. The agency may use a variety of means (including launching a public call or consulting with other agencies) to identify potential international members for its committees.

Panel conclusion: Partially compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2019 review recommendation

In 2019, the panel recommended a judgement of partial compliance for this standard. This was confirmed by the ENQA Board and by EQAR.

The 2019 panel made two recommendations:

- The panel recommends that the agency develops their thematic analysis based on the data they gather in their external quality assurance activities, i.e. meta-analysis.
- The panel recommends that, pending the appointment of additional staff, the agency explores options for outsourcing the work on thematic analysis.

Both of these recommendations were repeated in the formal ENQA Board letter confirming the renewal decision in October, 2019. EQAR concurred with this judgement.

Evidence

In its 2021 progress report, ACSUG acknowledged that this standard was still a weakness in the agency and this was repeated in the SAR in 2023. ACSUG also said that the problem was not unique to it and that many Spanish agencies had a similar problem. The agency added that REACU was doing some system-wide analyses and that ACSUG contributed to that work in two cases. ACSUG has also taken part in events jointly organised by REACU and other participating agencies to publicise the work. ACSUG participated in one such on-line event in 2021 to publicise information about journalism as a field of study.

In the SAR, ACSUG also states that its on-going staff shortage is the principal reason this standard has not received the attention it needs. ACSUG also said that they were unable to contract external consultants for this work because they would still have needed a member of staff to coordinate the work and none was available.

The Director of ACSUG, in his discussions with the panel, listed thematic analysis as an area that needed attention in the future, and also mentioned the participation of ACSUG in REACU projects connected to thematic analysis.

At its meeting with ACSUG staff directly engaged in QA work, the staff members also said that there was not enough time to do the work required for thematic analysis. They also mentioned international work as a factor but said this work was important because it contributed to the agency's reputation. They suggested that they needed an additional member of staff to work on thematic analysis and annual reports. They also said that they had done some work internally on thematic analysis between 2021-2023 but that it had not been published. They confirmed that no "external working groups" had been established to work in this area, something they had said would happen in 2019. They spoke of work they had done with REACU on Teaching Master Degrees. ACSUG coordinated the work for this project. They told the panel that, on an annual basis, they collated a summary document of the main recommendations in the evaluation reports and that this was sent to the universities and the ministry. The university quality assurance managers said they found this document very useful.

The panel asked the reviewers it met for their views on the absence of thematic analyses in the work of the agency. The reviewers were unaware of any requirement for such work to be carried out.

The panel met with members of REACU and learned that it operates as a network within which the role of coordinator is rotated among the agencies. REACU makes decisions based on reaching consensus. Most of its activity is concerned with developing or modifying guidelines for procedures

and working on thematic analysis. Working groups are established to deal with different topics, involving staff from different agencies. Following discussion, topics are selected. At the moment REACU is working on micro-credentials because the agencies are concerned about how to handle this issue and how to deal with the recommendations from ENQA and EQAR. The REACU website is housed on the ANECA site and lists its activities including those mentioned in the ACSUG's SAR.

A search of the ACSUG website for "thematic analysis" gives some detail of ACSUG's participation, together with six other quality assurance agencies - all members of REACU - on two reports produced and published, and there is a link to the published reports. One report on Childhood and Primary education was coordinated by ACSUG. The other is on university programmes in Computer Science and Telecommunications.

The panel met a selection of the quality assurance managers and quality assurance staff from the universities. They said they were not aware of any work of thematic analysis carried out by ACSUG. In follow-up questioning it became apparent that the university attendees were unaware of the requirements of this ESG standard.

In the SAR ACSUG mentions its work on graduate employability under its elaboration of thematic analysis. The panel learned at its meeting with stakeholders that the last collection of data on student employment took place in 2017 and that some of the analysis of that data, potentially relevant to prospective students, was not published for several years. It was also suggested by an attendee that not enough use was made of the collected data and that, in effect, analysis and publication of analysis had been paused for several years. The Director confirmed that this was the case and said again that staff shortages, moving premises and the pandemic had led to this work stopping.

Analysis

ACSUG acknowledges its weakness in respect of this standard. No individual is assigned responsibility for this area of work. The argument advanced by ACSUG that it could not have the work done externally because it would need an internal coordinator merits further examination. The panel saw evidence of good work done in other areas using external support - for example, the new ethics policy - and it is worth considering how a similar approach might be used for thematic analysis.

On the other hand, their work with REACU does show that ACSUG is both capable of and willing to participate in this type of work when it is prioritised in another forum. It is a positive development to see ACSUG engage with other REACU members on collaborative projects and to see the outcomes published. It now needs to ensure that the Galician system is aware of this work and can benefit from it.

The panel is not persuaded by the argument about insufficient staffing as a sufficient reason for ACSUG not to undertake this work in a more planned and comprehensive manner. ACSUG is making choices on the utilisation of staff time that prioritises international activity outside Europe over the work required to reach an acceptable threshold on this ESG standard. At management and governance level, it may be worth considering how to prioritise work on thematic analysis. There is also scope for engagement with regional stakeholders on the prioritisation of work that may be of assistance in guiding the regional strategy. The good work done by ACSUG on programme evaluations merits further analysis so that thematic analysis may enhance the system as a whole. ACSUG has a wealth of material available that could assist the system and the region were it to be utilised in the manner envisaged in this standard. The panel notes the comment from an attendee on the difficulty stakeholders have in understanding the basis for decision making in the system. A prioritised programme of thematic analysis could provide important signposts for the HE system and the region.

ACSUG states that it wishes to reach a higher standard of compliance with the requirements for this standard. The technical staff have a wealth of experience and expertise that could be utilised to achieve this objective. This expertise could be combined with external consultancy support in the short-term. If a decision was taken at leadership level, supported by the Governing Board, to identify a programme of work and the accompanying metrics and to put in place the organisational structure to achieve this objective, much could be done in even a short period of time. The use of AI can be explored as well, as potentially diminishing the time investment needed by staff.

There is an opportunity here for ACSUG to review the terms of reference of the CGIACA in order to ensure that it has a significant role in collaborating with agency leadership and staff on the selection of the specific topics and themes for thematic analysis. This could be done as part of a re-organisation of ACSUG following a re-appraisal of the alignment of its activity with its mission and goals.

ACSUG has worked to build its connections to other agencies over the last five years. Among REACU, ENQA and INQAAHE members there are many examples of good work on thematic analysis to be found. ACSUG could learn from its sectoral partners.

At every meeting, the panel heard that ACSUG needs to do more to enhance its public profile. Improving performance in this standard will provide ACSUG with the material it can use to demonstrate its capacity to contribute to regional planning, and higher education quality assurance in Galicia and in other regional, national and international fora.

This is one standard where ACSUG has a clear sense of its limitations but it needs to challenge its own thinking on how to bring about effective change. Over the last five years, ACSUG has not taken any proactive steps to challenge its own thinking and behaviour in respect of thematic analysis. The panel confirms that the agency has relied on the work of REACU but it should be actively creating its own programme of regional thematic analysis which could be a significant contributor to the regional HE system and the social, cultural and economic development of the region. Some progress has been made but there is scope to make substantial progress, even in the short term. However, this will only happen if the agency develops a new model for identifying its real priorities and puts the resources together to deal with its priorities. In the panel's view, leadership will be crucial in achieving a step change of this magnitude as will the active support of its key stakeholders in the university system and the ministry.

To dispel misconceptions about thematic analysis and learn from good (and not so) practices of other agencies in Europe, the panel wishes ACSUG to be informed of ENQA's occasional paper regarding thematic analysis, published in 2020⁵.

Panel commendations

I. The panel welcomes the joint work of ACSUG done within REACU in producing larger thematic reports.

Panel recommendations

I. That ACSUG, at leadership and governance level, commits to a programme of work on thematic analysis to be undertaken on a regular basis commencing in 2024 and puts in place the resources to carry out the work.

⁵ <https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf>

Panel suggestions for further improvement

1. The panel wishes to draw the agency's attention to the recommendation of the 2019 panel that, pending the appointment of additional staff, the agency could re-examine options for outsourcing part of the work on thematic analysis or seek other innovative ways to address the task, e.g. by using the AI.
2. That staff and CGIACA work collaboratively to select the regionally appropriate topics for thematic analysis.
3. Output of thematic analysis on programme and institutional levels in relation to developments, trends and areas of good practice or persistent difficulty could feed well into discussions with institutions and could further promote quality culture development and support the institutional responsibility for quality assurance.

Panel conclusion: Partially compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2019 review recommendation

The 2019 panel recommended that ACSUG be found “fully compliant” with this standard. This was accepted and endorsed by both ENQA and EQAR.

The 2019 panel suggested that ACSUG follow-up on translating the ESG 2015 to Galician in order to promote awareness of the ESG2015. This panel also commended ACSUG:

- *The panel commends ACSUG for the strength of the system which is reflected in the wide-spread implementation of the FIDES-AUDIT programme.*
- *The panel commends ACSUG for its role in translating and applying the ESG to different contexts in Latin-America.*

In 2021, the follow-up report again urged ACSUG to make a Galician translation of the ESG2015. ACSUG stated that it had made the translation and that it hoped to “publish it as soon as possible”.

The 2020 EQAR Approval notification noted that ACSUG had “recently piloted institutional monitoring” and requested that a substantive change report should be submitted by ACSUG for its newly piloted activities, showing how the agency ensures the compliance of its activities with the ESG”.

Evidence

As stated in the SAR, ACSUG was created in 2001, as a consortium between the Galician Government and the Galician Universities, with the aim of enabling the Galician University System (SUG) to achieve prestige and recognition within the context of university education in Spain, Europe and worldwide. The agency was among the first quality assurance agencies to be established in Spain and takes pride

in its work; the Governing Board also expressed its satisfaction and complete trust in the hard work of the agency. ACSUG serves a small higher education system.

It was frequently mentioned (both in the SAR and during the visit) that the overwhelming majority of ACSUG *ex-post* accreditations have positive results (between 89 and 96% in different years from 2019 till 2023) because SUG universities already have internalised the evaluation procedures. The agency stated it was sure of the maturity achieved in the implementation, through the FIDES-AUDIT programme, of quality assurance systems by universities and SUG centres. A favourable certificate of institutional accreditation allows each SUG centre to automatically certify all official degrees taught by it over a period of five years. It was noted that among the 82 universities in Spain, only 24 meet the two requirements to carry out the institutional accreditation of centres, of these three are public universities in Galicia. This was deemed as a reflection of the commitment of the Galician government, ACSUG and the Galician universities to improving quality.

The regulatory framework of the DOCENTIA Programme at the state level has changed with the publication of a new version of the program in 2021. The agency expects a new review of the Programme and that it will focus on the requirement for the development, by Universities, of a Teaching Professional Development Framework for their teaching staff.

During the pandemic the agency stopped organisation of events for the community even remotely. Post-pandemic, there are no events for the community that address common goals and challenges in higher education development, such as those stemming from the general EHEA agenda, or specifically EU-promoted topics, including micro-credentials, digitalisation etc.

The panel checked the website but could not find the Galician translation of the ESG. At its online meeting on 5th March 2024, the agency contact person said that the document had been sent to ENQA the previous week and this was confirmed by ENQA.

The SAR states that part of the ESG is always taken into account in the design of ACSUG's activities. The following table has been created by the panel to summarise this information:

Table 1. Compliance of the ACSUG's EQA activities with ESG part I, based on the analysis of the panel. Links to the documents and their label *DX* in the follow up analysis are shown in parentheses; the table specifies the sections, criteria or directives of each document provided by ACSUG through the SAR that constitute the evidence discussed in the analysis below). In the ToR, institutional monitoring was included on a condition it would be carried out by ACSUG. As no evidence was collected, neither in the SAR nor through the site visit, about completed or ongoing institutional monitoring procedures, it is omitted from the table below.

Note: the table includes the references to the different sections of the linked documents that the panel have found referring to the specific ESG, and not necessarily correspond to the numbering provided by the agency.

ESG Part I standards	Programme level					Institutional level		
	Ex-ant	Modificat	Monit	EX	Intern	Insti	FIDES-AUDIT	DOCF
	D1	D2	D3		D4	N/A	D5	D6
I.1 Policy for quality assurance	Sec. 8	Tab. 8	Crit. 3			The initial institutional accreditation does not require a site visit, it is only a verification that the two basic requirements are met: at least 1/2 of degrees accredited and certification of the implementation of its internal QA system.	Direct. 1	Sec. 1
I.2 Design and approval of programmes	Sec. 1&4	Tab. 8	Crit. 1				Direct. 2	Sec. 2
I.3 Student-centred learning, teaching and assessment	N/A	N/A	Crit. 3				Direct. 3	Sec. 5
I.4 Student admission, progression and certification	Sec. 3	Tab. 3	Crit. 3					N/A
I.5 Teaching staff	Sec. 5	Tab. 5	Crit. 1,5&7				Direct. 4	D6 ⁶
I.6 Learning resources and student support	Sec. 6	Tab. 6	Crit. 5				Direct. 5	Sec. 5
I.7 Information management	Sec. 8	Tab. 8	Crit. 7				Direct. 2	Sec. 2
I.8 Public information	Sec. 3&8	Tab. 8	Crit. 2 (and Annex II)				Direct. 6	Sec. 5, 6, 7, Annex VII
I.9 Ongoing monitoring and periodic review of programmes	N/A	N/A	Crit. 3&7				Direct. 2	Sec. 6, Annexes IX, XI
I.10 Cyclical external quality assurance	N/A	N/A	Sec. 1	Sec. 2				Sec. 6

ACSUG states that its aim is to help HEIs meet internal quality assurance criteria and to provide assurance that the requirements of part I are met. This is done at both programme and institutional level and the aim of ACSUG is to move the system as a whole towards more focus on institutional evaluation. This is in line with Spanish government policy and guidelines to achieve this objective have been developed by REACU. These guidelines are then translated into regional guidelines to take account of the regional context. This programme is called FIDES-AUDIT and is a voluntary procedure for the HEIs. The FIDES-AUDIT programme is also specifically designed to incorporate part I of the ESG 2015. The quality assurance staff of the agency told the panel that initial accreditation was

⁶ The complete document D6 deals with ESG I.5.

“automatic” in 2019 and that the agency is now working on drafting the guidelines for a review in 2024. Centres which have not complied with the requirements during the last five years will not be able to renew accreditation.

The panel checked with the attendees from the panel of reviewers on the methodology used in their evaluations. The reviewers confirmed that they followed a systematic procedure that includes a site-visit. This was conducted on-line during the pandemic but has now reverted to in-person visits. The reviewers said they got very good technical support from ACSUG and explained that their reports were checked for consistency by the internal field of study committees that scrutinised all panel reports prior to their consideration by the CGIACA. They also were very impressed with the updates they received on procedures following modifications. They said that they were not routinely surveyed after each piece of work but were surveyed on an annual basis. When asked if they had any suggestions for improvement, they mentioned reducing the level of bureaucracy in procedures and renewing the panel of reviewers.

The DOCENTIA programme began in 2007 and its objective is to provide a quality assurance procedure to evaluate and enhance the quality of teaching. It is a voluntary programme and there is an uneven pattern of participation in the programme in the four universities in the system. University of A Coruña has made six calls under the programme between 2018 and 2023 and about 78% of its teaching staff has been evaluated. It will seek to evaluate its own evaluation procedures in 2024. The University of Santiago de Compostela has not utilised this programme since 2014. Between 2017-2023, The University of Vigo made three assessment calls. In addition, The Defence University Centre (a centre affiliated to the University of Vigo) developed its own teaching evaluation manual, in accordance with the principles of DOCENTIA. This was verified in 2017 and has been used for four rounds of evaluation. The new private University (Intercontinental University of Business) is designing its quality assurance system, and it will include a teaching programme that is expected to be linked to the DOCENTIA programme. The quality assurance managers from the HEIs see the DOCENTIA programme as the most valuable part of the activity of ACSUG. (This appears to be because of its link to the payment of bonuses to teaching staff.) The DOCENTIA programme itself is due to be reviewed in 2024 and it is intended that this review will focus on the requirement for the universities to develop a Teaching Development Framework.

The panel looked at the published reports of various procedures and noted that the names of the panel members are not included in the reports. This was checked with both the technical staff and the Director. It appears that this is a long-standing practice. Moreover, not all reports, for local and international procedures, were found published on the agency’s website and the DEQAR.

Analysis

At all its meetings with stakeholders from Galicia, a high degree of confidence was expressed in the procedures carried out by ACSUG. The leaders of the HEIs expressed their confidence in the work of the agency and in the fairness of its procedures. The quality assurance managers expressed the same level of confidence and were particularly appreciative of the briefings they received from technical staff on any modifications or updates to procedures. They spoke of weekly contact with the technical staff but did note the absence of any formal conferences since 2019. All HEIs said they benefited from the consolidated report prepared each year on findings by different evaluation panels.

ACSUG is trusted in the Galician system and its procedural fairness and independence was attested to by attendees. It carries out its work in an efficient manner and the technical staff are responsive to any queries from the HEIs. A large volume of procedures has taken place in Galicia and there is

recognition by ACSUG and the HEIs that moving the system towards more institutional level evaluation will reduce unnecessary duplication.

An attendee from one of the universities suggested that the current operating procedures may not allow sufficient time for reflection and for the growth of the enhancement focus. ACSUG staff and the Director said that they do try to encourage a stronger enhancement focus in the HEIs but the Director added that the HEIs can be “slow” to change. The panel sees an opportunity in the next wave of institutional reviews for a much stronger focus on enhancement.

There is a need to update the system and all evaluators on important changes that occur. The lack of knowledge of the new Review Committee needs to be dealt with as a priority.

Publishing of expert reports currently is not complete; thus the names of the panel members shall be included in the reports. All reports, for procedures within Galicia and internationally, have to be published on the agency’s website and the DEQAR. This needs to be addressed swiftly.

According to ESG 2.1, *“External quality assurance should address the effectiveness of the internal quality assurance described in Part I of the ESG”*. Following this standard, the panel has compiled in Table I the way the different protocols and guides deal with the different standards in ESG Part I. Six different documents are analysed (D1-D6)⁷:

- 1.1 Policy for quality assurance. The internal QA system is referred to in D1, D2, D3. In all cases, the information provided in the guides reflects the existence or modification of the QA system. In addition, D3/D4 include detailed information about the QA system monitoring. D4 includes detailed information about the importance of the existence of a QA system in the evaluated institutions. The procedures for the development and implementation of the QA system are described in detail in D5 (FIDES-AUDIT). In terms of teaching staff evaluation (DOCENTIA program), D6 specifically mentions the relationship between the program and the QA system.
- 1.2 Design and approval of programmes. D1 includes extensive information about the planning of new degrees, distinguishing between BSc and MSc. Directive 2 in D5 (FIDES-AUDIT) includes a collection of criteria that encompass several standards in Part I ESG. In particular, the directive emphasises the aspects related to design and approval of programs. The design and approval of the DOCENTIA program is described in some detail in D6, including also a mention to [The Personnel Evaluation Standards](#) by The Joint Committee of Standards for Educational Evaluation.
- 1.3 Student-centred learning, teaching and assessment The implementation or modification of new degrees (D1, D2) does not include explicit information about how to handle student centred teaching and learning. However, the topic is largely developed in D5 (FIDES-AUDIT) under ACSUG directive 3, “Guarantee of learning, teaching and student-centred assessment”. D6 includes a specific mention of the student centred teaching by emphasising the need for the models of teaching evaluation to provide proper Adequacy, Satisfaction, Efficiency and Teaching Innovation Focus.
- 1.4 Student admission, progression and certification. D1 includes details on the admission processes and the need to implement them in a transparent and clear manner. D3/D4 mention explicitly this ESG. Although no specific directive exists in D5 for this standard, ACSUG directive 3 in FIDES-AUDIT specifies the need for the QA systems to include “Clear and continuous evidence of the adequacy of procedures related to the Ensuring student-centred learning, teaching and assessment” and, in particular, “Student admission (specific tests, profile, recruitment). Application of predefined regulations that cover the entire student life cycle (admission, progression, recognition and certification)”. The panel also looked in the documentation and held the site visit discussions regarding expectations under guidelines part of ESG 1.4 to see if the requirements of the Lisbon Recognition

⁷ note that D3 and D4 are essentially identical in terms of content and, thus, compliant with ESG Part I.

Convention on fair recognition, as well as expectations for cooperation in a triangle between ACSUG as quality assurance agency, Spanish ENIC-NARIC centre, and HEIs were incorporated but found them missing. The panel formed an opinion the agency misunderstood the essence of the expectations for QA agencies under ESG 1.4. Notably, guidelines under ESG 1.4 do not call for QA agencies to offer recognition services of foreign qualifications; it is understandable that organisations carrying those functions can be different. There are examples where both functions are housed under the same roof, but the panel is aware that in Spain those functions are allocated to different organisations. However, what ESG 1.4 wishes for is that fairness of recognition processes in student admission be checked via internal and external quality assurance, and for that to happen recognition needs to be under the agency's radar, but the ways to implement that are not imposed, agencies are free to take different approaches. Most important is that recognition as a topic is included into the agency's work in a cooperative manner together with HEIs and ENIC-NARIC offices. Inspiration on what exactly could be done is available in the relevant international guidance - the LIREQA recommendations⁸ or the SPOTLIGHT tool⁹ promoted jointly by EUA, ENIC-NARIC offices and some QA agencies.

- 1.5 Teaching staff. Description of the categories of teaching staff is provided in D1, following the law (<https://www.boe.es/eli/es/rd/2021/09/28/822/con>). However, only simple instructions on the way to incorporate new teaching staff are given. D2 does not add value in this matter. D3/D4 insist on the legal requirements for teaching staff, although the importance of the development is mentioned in several criteria (see Table 1). It is advisory to follow the guidelines in ESG 1.5 on providing a supportive environment for teaching staff, in particular in terms of fair and transparent recruitment processes, new opportunities for staff development, as well as to bring both innovation and research into the teaching environment. Not surprisingly, all elements described in ESG 1.5 guidelines can be properly found in the DOCENTIA program.

- 1.6 Learning resources and student support. D1 and D2 describe general and simplified rules for the inclusion of details on the learning resources and student support in the ex-ante and modification accreditations, respectively. D3/D4 provide a detailed compilation of the resources needed to ensure the proper deployment of the program. D6 introduces the efficient use of teaching resources as part of the teaching staff accreditation.

- 1.7 Information management. D1, D2 identify the QA system as the mechanism for information management for new degrees. All details on their implementation and accreditation are specified in the FIDES-AUDIT protocol (D5). D3/D4 include an extensive list of evidence (Annex III) that deal with the information management, among other requirements, in a structured way. A strong role to the QA system is given in the different protocols, identifying it as the key element for information management. In particular, it is proposed as the place to keep all data required for the titles (re)accreditation.

- 1.8 Public information. Different documents emphasise the need for the existence of publicly available information. D1, for example, mentions succinctly this need in "8.2: *Media for public information; The university will inform the public information media of the study plan that they have and that they will use to meet the needs of the student body.*" In addition, the same document commands to include (Sec. 3) the "*description of the dissemination channels to inform potential students*". D2 refers to the topic in the same way. Several paragraphs in D6 refer to this ESG, including (Annex VII) the need to publish the fact that the university is following a review process.

- 1.9 Ongoing monitoring and periodic review of programmes. Despite the table provided in the SAR, no specific mention to ESG 1.9 is provided in D1. D3/D4 contain detailed requirements on ESG 1.9, with a special focus on the use of the QA system to ensure the proper monitoring of degrees. D6

⁸ https://www.enqa.eu/wp-content/uploads/2019/05/LIREQA_recommendations_final_web.pdf

⁹ available in several languages, including Spanish <https://www.eua.eu/publications/reports/improved-recognition.html>

includes a thorough description of the monitoring processes, including description of the tasks and templates for the monitoring commission.

- 1.10 Cyclical external quality assurance. D3/D4 mention in introductory sections the timing for cyclic renewal of the degrees accreditation which, by law (Real Decreto 822/2021), is established as a maximum of 6 years for degrees of 240 ECTS, MSc and PhD programs, and a maximum of 8 years for degrees of 300/360 ECTS. In terms of teaching staff, the accreditation of the DOCENTIA has a validity of 5 years (D6), institutional accreditation is also valid for 5 years; ex-post accreditation of degrees happens after their complete implementation (6 years).

Panel commendations

1. The panel commends the technical staff of ACSUG for their administrative efficiency in updating procedures and guidelines and communicating these changes to the QA units in the universities.
2. The panel commends ACSUG for the wide-spread implementation of the FIDES-AUDIT programme.
3. The panel commends ACSUG for its role in translating and applying the ESG to different contexts in Latin-America.

Panel recommendations

1. The panel recommends that the requirements of ESG 1.4 be directly addressed and the principles of The Lisbon Recognition Convention be incorporated in procedures as well as cooperation with HEIs, Spanish ENIC-NARIC and other relevant bodies established for promotion of fair recognition and ensuring coherent recognition practices across the Galician university system.

Panel suggestions for further improvement

1. The panel suggests that the review panel members be surveyed systematically at the end of each review and that their recommendations on streamlining administrative procedures be considered.
2. All reports, including negative ones, both for procedures within Galicia and internationally, need to be published by the agency and on the DEQAR.
3. Reports shall contain names of the expert panels as is the practice of other agencies.¹⁰

Panel conclusion: Compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

2019 review recommendation

The 2019 panel recommended that ACSUG be considered “Substantially Compliant” with this standard. This was accepted by the Board of ENQA. The 2019 panel recommended that ACSUG establish “*an independent committee or body to evaluate appeals of decisions made by the CGIACA before starting the juridical procedure.*” This was repeated in the reconfirmation of membership letter from

¹⁰ The panel includes suggestions two and three here in order to ensure they are captured in the report.

ENQA. EQAR said it was unable to concur with the judgement of substantial compliance and amended it to “Partial Compliance.” EQAR said that whilst it welcomes ACSUG’s intention to set up a separate board to handle appeals, it was not *in situ* at the time of the review.

In the follow-up report of 2021, ACSUG said it “*was going to create a specific committee to deal with the evaluation appeals.*” ACSUG added that it expected the new body to be “created and in operation” before the end of 2021.

Evidence

The CGIACA agreed to establish a new committee at its meeting in December 2021 and also agreed a protocol “for resolution of complaints and appeals issued to ACSUG.” The composition of the committee was also agreed: a president, two other members and the president of the CGIACA or his/her nominee “who will attend the meetings with voice but no voting rights”. In addition, a member of the staff of ACSUG may be appointed as secretary of the committee, again with “voice but no voting rights” or the secretarial role may be assigned by the CGIACA to one of the other members of the committee. The president was to be selected from “among jurists of recognised and reputed experience.”

The terms of reference of the Review Committee are such that the Committee is expected to form “an opinion” on an appeal and this opinion is then submitted to the CGIACA which takes the final decision.

Notice of the creation of the committee was published in the Official Journal of Galicia in February 2022 and the members of the committee were appointed in May 2022.

The Review Committee began to exercise its functions in February 2023 and from that date to date of the completion of the SAR it had held seven meetings. 34 appeals were considered at the seven meetings and none of them related to degree evaluations. The appeals to date are concerned exclusively with the payment of bonuses and accreditation of teaching staff so are outside the scope of this review. In the SAR, the explanation offered for the absence of any appeals of decisions on programme or institutional evaluations is that any contentious matters are resolved in the 20 day period allowed for resolution of any issues after the issuing of the preliminary report and before the preparation of the final report by the evaluation committee in advance of its submission to CGIACA.

The SAR states that complaints and “general questions” are normally submitted to ACSUG through the suggestion box that is on the ACSUG website. By and large these are queries rather than complaints, and they are dealt with by ACSUG staff, generally within three working days.

The panel discussed the new Review Committee with the president and members of the CGIACA. The president said that it was possible for the CGIACA to reach a different conclusion from the Review Committee. He also added that the judicial route still existed for any complainant. He said that the presence of the president of the CGIACA at the meetings of the Review Committee ensured that the context of the complaint was explained to this committee.

The panel met the members of The Review Committee in a separate meeting. In answer to questions on how they were appointed, each of the three indicated that they had been approached and asked to serve. They clarified that each was asked because of a specific expertise, one in law, one in teacher evaluation and one in quality assurance. They are paid expenses but are not paid a fee. Each had participated in ACSUG processes in the past. The secretary of The Review Committee is from the staff of ACSUG and he is also the secretary of the CGIACA. The secretary briefed the members on the terms of reference at the first meeting and gave each member the necessary documentation.

The procedures allow for on-line meetings if necessary but to-date all meetings have been in person and they are scheduled as required.

The members of the Review Committee agreed that they made a proposal to CGIACA and that the final decision was made by CGIACA.

In respect of decisions, the Review Committee protocol does not allow it to make a decision that delivers a judgement that is harsher or more penalising than the decision under appeal. In other words, an appeal cannot result in a worsening of the situation of the appellant. The Chair of the Review Committee also said that having the President of the CGIACA at the meetings helped them to understand the context. He also confirmed that the procedures do not allow the complainant to attend the hearing although the President of the CGIACA (the committee against whose decision the appeal is lodged) is there. A record of each decision is made, including the reason(s) for the decision and this is made available to the complainant. The panel asked the chair if a university could by-pass the Review Committee and make an appeal directly to the Ministry. The Chair did not know what the position was in a case of that nature.

The Review Committee members said they did not have sufficient experience of its operation to reach any general conclusions about the workings of their committee.

The panel asked the reviewers it met at a meeting during the site visit for their views on the Review Committee. They told the panel that they had no experience of the operation of the relatively new Review Committee in charge of complaints and appeals and were not familiar with its role or composition. They explained that any issues that arose were always addressed in the discussion that took place with the relevant university centre during the fact-checking phase of the procedure.

Analysis

At the initial briefing meeting, the Director of ACSUG referred specifically to the creation of the Review Committee and said it was evidence that ACSUG had responded to the 2019 report, albeit with a slight delay compared to what was planned.

The panel welcomes the creation of the Review Committee but has reservations about its composition and terms of reference. Crucially, it does not make a decision; it forms an opinion. The final decision is made by the CGIACA and CGIACA is the body that issued the original decision that gave rise to the appeal.

The panel does not accept that the President of the CGIACA should be a member of the Review Committee or attend meetings in observer status, even with no voting rights. The composition of the two bodies should be completely separate, as well as organisation of their work.

The panel would also favour the introduction of a formal application process for appointment to the Review Committee. It would also benefit from the student member inclusion.

The process of establishing this committee took a considerable amount of time and it is difficult to understand the delay. In spite of the strong recommendations in the review in 2019 and the comments from EQAR, ACSUG persisted with a method of appointment to a key committee that was deemed unacceptable five years ago. ACSUG appears to have only partially accepted the recommendation made then and seems to think that the appearance of independence and separation of function will suffice. This is not what was intended in the 2019 recommendation.

There is a need to update the system and all evaluators on important changes that occur. The lack of knowledge of the new Review Committee needs to be dealt with as a priority.

To-date, there has been no case brought before the Review Committee in respect of the quality assurance activity of the agency, within the scope of the ESG. This was explained as arising from the consultation that occurs before the panel reports go to the CGIACA. It is of course correct that an opportunity exists for the correction of factual errors following the production of a draft report by a review panel. This should be formalised, and other appeals should be referred to this new committee. This would improve the transparency of ACSUG's processes.

Panel recommendations

1. The terms of reference of the Review Committee should be amended to create a complete separation between it and the CGIACA.
2. The Chair of the CGIACA should not attend the meetings of the Review Committee.
3. The process for selection of members of the Review Committee should be amended to create an open competition with clear statements of the criteria used for selection.
4. All institutions in the system should be given full information on the role of the Review Committee.
5. All reviewers on panels should be fully briefed on the Review Committee.

Panel suggestions for further improvement

1. Stakeholder representation on The Review Committee could be strengthened by the inclusion of a student member.
2. The Review Committee could produce an annual report that includes recommendations for changes in ACSUG's policies and procedures.

Panel conclusion: Partially compliant

ENHANCEMENT AREAS

ESG 3.5 & 3.6

As is required under the Terms of Reference for a targeted review, the selected standard(s) for the enhancement purposes must have had a higher than “partial compliance” in the previous review. ACSUG opted to nominate two standards, 3.5 and 3.6, for this section of the review.

Enhancement Session(s) Methodology

The panel discussed a variety of approaches to the enhancement section of the site-visit on a number of occasions both before and during the site-visit. The SAR did not provide the type of analysis and reflection that might have assisted its work so the panel sought additional submissions from the agency for each of the nominated standards. The panel requested separate documents for each standard and in each case asked for a rationale for the selection of the standard, a reflective analysis of challenges that ACSUG felt it needed to deal with and their own thinking on possible roadmaps for tackling outstanding issues. Additional documents were prepared and submitted by ACSUG. However, the additional documentation was also limited in scope. The panel also discussed with the agency the selection of the attendees for both enhancement sessions and then accepted the wishes of the agency. ACSUG had full control of who attended the enhancement sessions. The Director did not attend, nor did any members of the Governing Board. The agency said that it wished to have the external consultant working on the new strategy attend. Other attendees nominated by ACSUG were all from the technical staff of the agency.

The panel also decided to hold a separate meeting during the site-visit for each standard nominated for the enhancement section of the targeted review. When discussing the enhancement process with the Director and the ACSUG contact person, the agency said that it wished to have the external consultant working on the new strategy attend. Other attendees nominated by ACSUG were from the staff of the agency.

As the panel’s understanding of the dynamics of the agency developed during the site visit, it was decided that the attendees should be encouraged to use the session to consider in a broader and more holistic manner the culture, mission and goals of the agency and how they might be translated into effective strategies for tackling some persistent, underlying issues. The panel was particularly interested in strengthening the enhancement focus of the discussion. The panel was also conscious of the extent to which the necessary reliance on translation services during the two sessions would impact the free flow of the discussion.

ESG 3.5 RESOURCES

Standard:

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

2019 review recommendation

The judgement on this standard in 2019 was “Substantially Compliant”.

Discussion

The 2019 panel recommended, under ESG 3.5, that ACSUG “continue the efforts to solve the issues related to the vacancies with the ministry in order to ensure full staffing as soon as possible.” Other recommendations under this standard were that ACSUG use its unused funds to outsource some work, including the translation of the the ESG to Galician. The third recommendation was that ACSUG “recruit experts from outside of Galicia for all its governing and evaluation bodies.”

The panel noted the comments in the SAR on the selected enhancement areas and also noted the contents of one very short document submitted just in advance of the first panel briefing meeting. The short document on this standard re-stated what had been said in the SAR under this section and in the introduction covering the system since 2019. ACSUG reminded the panel of the multi-annual funding structure, the move to new premises and the regrading of staff since 2019. These were listed as positives. ACSUG suggested that the enhancement session might discuss the following questions/issues:

- How the agency could utilise “the unused budget funds”?
- How ACSUG could improve the process of covering staff vacancies and “other staff circumstances”?
- What might be the main areas for improvement in the “distribution of functions” in the agency?

The panel heard about the need for extra staff from all internal attendees but it was not clear that a systematic approach to addressing this issue with the Ministry had been adopted. The Ministry officials (in a separate meeting) acknowledged the workload, including the volume of work of activity outside the scope of this review and the discretionary international work. Repeatedly the panel was told that it is a lengthy process to get additional staffing and that it was not possible to hire outside the constraints of public service appointments. The panel did see evidence of external consultants being used but it was never clear why they could be used in some instances and not in others. The international work outside of Europe is valued by the agency, so it always seems possible to allocate resources to it. The panel discussion tried to elicit how ACSUG prioritises its resource allocations. The chair began the session on ESG 3.5 by reiterating the enhancement focus of the session and she then reminded the attendees of the three questions they had proposed for discussion. The attendees wanted to discuss the accumulated surplus of ACSUG (€1.4 million). The staff reiterated their understanding that this money could not be used for contract work or temporary staffing, as any surplus in public finance should be returned, in this case it would appear to the SUG (University System) to which the budget allocation for ACSUG is made in the first instance. They explained that the surplus accrued because some planned spending had not taken place during the pandemic. The attendees then emphasised their belief that they had done well to get regrading of staff and again said they needed additional staff but that achieving this was a lengthy and complex process.

The panel probed the agency if these questions were the real questions to be asked and encouraged ACSUG to take a more strategic approach. The chair asked the attendees to consider an analogy. She spoke of a boat sailing in a storm, but that even during a storm the boat knows its destination. Deciding on the destination is the job of the captain, not the rowers. In this context, she asked the attendees to consider the decision not to develop the strategic plan or to work on thematic analyses or not engaging strategically regarding staffing issues where some questions are solved but other very important ones - not. The attendees at the meeting noted the analogy.

The attendees said that they continued to do the evaluation and monitoring work and that the quality management system was a big help. The chair asked that a demonstration of the system be arranged for the panel and this took place after the second enhancement session.

The panel listened carefully to the technical staff. Their loyalty to ACSUG was very evident. Most of them have worked with the agency for many years and rightly take pride in their work and also for some specific innovations: for pioneering the FIDES-AUDIT procedure in Spain; for the introduction of IT tools supporting evaluation processes etc. They were, for example, evidently disappointed and surprised when the panel shared with them an observation from an international reviewer that their procedures could be less bureaucratic. They value the opinion of their reviewers and those they engage with in the universities. Through their membership of REACU and ENQA, there is scope for the technical staff to be offered short placements in other agencies. It would be useful to look at allocating some of the budget surplus to this type of work, as well as strengthening of English language capacity enabling technical staff this wider learning and sharing within ENQA family and further away.

The technical staff work hard on implementing the procedures in respect of both programme and institutional evaluations. The international activity is an additional work-load, albeit a discretionary one. ACSUG needs to consider how its work-force is deployed so that it can move beyond its present procedural focus. This is limiting the potential of the agency and also hindering the professional development of its staff.

The panel notes ACSUG's human resources capacity is clearly not enough and needs expansion to enable better coping with the workload and to reduce stress.

Panel commendations

1. The panel is impressed by the competence and loyalty of technical staff who care deeply for the Agency and their work.

Panel Suggestion(s) for Further Improvement

1. A dedicated staff development programme (adequately resourced) could be put in place to create learning partnerships with other agencies. This should be available to staff and to members of the CGIACA. This programme should also include a significant element of a foreign language skill acquisition.

2. ACSUG's human resources capacity needs expansion to enable better coping with the workload and to reduce stress.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

2019 review Finding: Substantially compliant

Recommendation from the 2019 panel and the ENQA Board: *“The panel recommends the agency to develop a policy for equal opportunity that also guards against intolerance or any kind of discrimination, which covers the agency and all its activities.”*

Discussion

In the 2021 follow-up report, ACSUG stated that it was working on the production of a new Code of Ethics. This work was undertaken by an external consultant. The panel examined the document and checked that it was published on the ACSUG website. The new Code of Ethics is very well developed and produced.

Following a request from this panel that ACSUG more fully address the theme of enhancement in respect of the areas selected by ACSUG, the agency sent an additional note on March 5th. The note acknowledged the “lapse of time” between the development of the first strategic plan and the work that had now commenced on a “new” strategic plan and suggested that the enhancement session might focus on the following:

“1) Effective procedure for the monitoring of the Strategic Plans. Importance of the Operational Annual Plans, allocation of resources and prioritisation of actions. Compromise for launching consecutive plans in a more suitable time.

2) Importance of the Strategic Plans for boosting not only the evaluation activities (main responsibility of the agency), but also other internal, external and transversal actions (accountability, internal quality assurance, communication, coordination, internationalisation, collaboration activities, thematic analyses, etc.)”

The staff attending this session (and the external consultant) again told the panel of the legal constraints under which they operated. Panel members highlighted the importance of raising these issues in appropriate external fora. The staff suggested that their function as the technical staff of the agency was to do the work required of them. In effect, they told the panel that seeking external stakeholder support for change was not work that fell within their ambit.

The panel attempted to get a sense of the pattern of interaction in the agency between the technical staff and the Governing Board. It also looked for a clearer picture on the organisational structure and functioning of the agency.

The Governing Board gets bi-annual activity reports. The Director is responsible for the allocation of duties and roles. The agency has no managerial heads of function. The staff outlined the heavy volume of administrative procedures they operate and described the streamlining of some procedures through the use of enhanced IT systems that have been developed inhouse.

Panel members addressed the role of a strategic plan, the purpose of a governing authority, the need to step back from an activity focus and the role of leadership in internal quality assurance.

The panel was interested to learn more about ACSUG’s international activity. The agency was asked about ACSUG’s criteria to establish the status and recognition of institutions with which it conducts external quality assurance abroad. It appears that general knowledge of the particular education system and reputation of the institution were the decisive factors. While this informal attitude may suffice in most of the situations, the panel encourages the agency to take a better defined approach to this in checking the legal status of institutions and their higher education provision. The process of establishing appropriate communication with relevant authorities of those jurisdictions where the agency would operate is not precisely defined (it may or may not take place) and this aspect of engagement would also benefit from more clarity. The integrity of the work of ACSUG is important to all and the panel is mindful of the pit-falls of international engagement in circumstances where the rules of engagement are not sufficiently robust.

The purpose of a Quality Manual was discussed. The agency takes pride in its quality management system's certifications, including that of ISO and environmental consciousness. However, the opportunity to measure its own work by alignment to expectations of the ESGs is not well-developed and this could be a focus for the next review of the Quality Manual. The panel encourages ACSUG to take a fresh look at the most important indicators to measure its own quality and wishes to challenge it to go beyond very formal and easily measurable quantitative aspects of its work. A focus on more meaningful indicators and outcomes, linked to the agency's mission, may assist, not only in the efficient implementation of procedures, but also in more active engagement with the higher education community within the region and beyond. Such a focus may also assist ACSUG in more actively contributing as members and peers in professional associations in Europe and internationally.

The maturity of internal quality assurance systems in SUG seems to be conducive to shifting focus from compliance checking procedures to more enhancement oriented measures - not only to different types of procedures at institutional level but also to the addition of a different portfolio of activities, including more active dialogue with quality managers, academics and students at institutions in sharing effective practices, learning from international approaches and contributing to the discussions of current issues in higher education, such as teaching and learning, academic integrity, challenges and opportunities of digitalisation etc. Rather than being a burden of an additional task, thematic analysis could nicely support this work.

It is really a pity that, currently both in the eyes of the academic community and public authorities, from those activities which are implemented by ACSUG, faculty complementary bonuses were most often cited as the most important work of the agency - which is a rather atypical function when one looks among other European quality assurance agencies. (Although the panel is aware that it is the practice in other Spanish agencies). Dialogue and enhancement-oriented activities were not mentioned. Quality assurance is a technical matter; however, if it does not lift itself above the procedural level to the meta level and lacks reflection on what purposes it serves, what impact it seeks, what could be done better and differently, it risks losing its appeal to academics. Moreover, it is then viewed as (unnecessary) bureaucracy. Likewise, quality assurance which does not respond to student needs and concerns in a timely manner is detached from their reality and is weakening its potential to improve the real learning and teaching process.

The discussion also referenced the introduction of an "outcomes" focus to the work of ACSUG. At the moment, much of the focus is on inputs and procedures. It is also very difficult for any organisation to thrive and develop if it does not have qualitative indicators against which to measure its own performance and if it does not look at others engaged in similar work to see what can be gleaned from their way of thinking and doing. The panel also met attendees who could contribute to fresh thinking in ACSUG on adopting such an approach but did not get the impression that there is either the inclination or structure to facilitate such engagement.

The panel discussed with the attendees the enhancement focus of a targeted review and looked at the approach used in other reviews. Three of the panel members had also participated in other targeted reviews and shared their ideas. They emphasised the value for an agency of taking a "new look" at itself and also attempting to create some distance between routine activity and an ambitious set of enhancement goals. A mature agency like ACSUG has an opportunity to challenge itself more robustly. An attendee from one of the HEs at an earlier season spoke of the need for ACSUG to put a bigger focus on enhancement and regretted that the faculty in which they worked would not routinely think of ACSUG as a source of help. The agency, it was suggested, was too often perceived in the HEIs as a "judge" or "prosecutor". Here we see the distance between the agency's perception of its role and

the way in which it is perceived externally by some. The U.S. writer Joan Dideon once wrote that “the last thing we know about ourselves is how others see us” - this may be the case with ACSUG too.

The panel felt that there would have been benefit in having a wider organisational buy-in to the enhancement sessions.

Panel Suggestions for Further Improvement

1. The panel suggests that ACSUG strengthen the enhancement focus of its activity and realigns its Quality Manual with this objective.
2. The panel encourages ACSUG to examine the extent to which its communication with international external authorities and institutions is sufficiently robust so as to protect ACSUG’s own position and enhance the understanding of its role as a quality assurance agency.

ADDITIONAL OBSERVATIONS

ACSUG is an important and valued part of the regional system of higher education. This was evident in all of the views expressed to the panel. As the only approved agency for QA operating in Galicia, there is now an opportunity for the agency to consider a whole of system appraisal that will enable it to chart and implement a revitalised and enhanced role in QA in the region.

The 2019 review report provided ACSUG with a roadmap for change that offered many valuable insights, recommendations and suggestions. Reading the three documents produced by ACSUG - the 2019 SAR, the 2021 Responses to the Follow-Up Procedure and the 2023 SAR, it may now be evident that some more consideration could be given to addressing the totality of the 2019 recommendations. On this occasion, the panel is therefore making several very detailed recommendations in the hope that they will become the focus of an action plan, tied to the agency's mission, goal and strategy that will be implemented on an incremental basis in each of the years up to the date of the next review.

The panel is mindful that ACSUG is a small agency that has achieved a great deal. A staff development programme that broadens the skill set of staff might yield additional dividends. This should include intensive development of language competences and broader involvement with other ENQA agencies.

In the spirit of looking outward, ACSUG should pay particular attention to the Lisbon Recognition Convention (and fair recognition) and work with all HEIs and the ENIC-NARIC office to implement its requirements. Effective international practices and tools are already available, and the panel encourages ACSUG to get acquainted with them and consider adopting its own approach to the topic.

It is important too that the whole of the university system is kept very well informed on quality assurance innovations. There was, for example, no awareness in the HEI attendees of the existence of the new Appeals and Complaints procedures. The student attendees were all very positive about their engagement with ACSUG, but all had the same thing to tell us: they knew nothing about ACSUG until approached directly to get involved. The general student body (both second and third cycle) should be a particular target of a new communication strategy. ACSUG should also create a pool of student reviewers who receive specific training in the work of the agency and who are also asked to contribute to building awareness of the agency in the region.

Finally, the panel had a very fruitful and thought-provoking interaction with ACSUG. The pandemic brought seismic change but also showed what can be achieved when an agency is confronted with difficult and unexpected problems. The capacity to adapt could now be applied to other challenges. Likewise, all agencies work within the confines of the laws and regulations; however, laws can and should be amended in the interests of enhancing the system as a whole. The panel is confident that there is a good foundation on which to build a strong future in ACSUG.

CONCLUSION

SUMMARY OF COMMENDATIONS

Panel Commendations

1. Agency staff is dedicated to excellent implementation of evaluation and accreditation procedures. (ESG 3.1)
2. The panel commends the manner in which the review panels operate with complete independence. (ESG 3.3)
3. The panel welcomes the joint work of ACSUG done within REACU in producing larger thematic reports. (ESG 3.4)
4. The panel is impressed by the competence and loyalty of technical staff who care deeply for the Agency and their work. (ESG 3.5)
5. The panel commends the technical staff of ACSUG for their administrative efficiency in updating procedures and guidelines and communicating these changes to the QA units in the universities. (ESG 2.1)
6. The panel commands ACSUG for the wide-spread implementation of the FIDES-AUDIT programme. (ESG 2.1)
7. The panel commends ACSUG for its role in translating and applying the ESG to different contexts in Latin-America. ESG 2.1)

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1	<ol style="list-style-type: none">1. The panel recommends that ACSUG develops goals and objectives with accompanying metrics, targets and timelines, and consolidates this into a medium-term strategy.2. The panel recommends that the leadership and governance structure and responsibilities in ACSUG be clarified in order to create a matrix of responsibility for strategic planning and implementation.3. The panel recommends that ACSUG develop a clear protocol on the separation of consultancy and accreditation procedures and publishes it on the website.
ESG 3.3	<ol style="list-style-type: none">4. The panel recommends that procedures for the appointment of the Director, the Chair and members of the Governing Body, the Chair of CGIACA and the Chair of the Advisory Council be put in place that are based on well-established principles guaranteeing the organisational independence of ACSUG with real rotation of membership in all bodies, clearly separating roles and responsibilities, to assure no interference from third parties, including the government and universities.5. The panel recommends that ACSUG engage with the Ministry and SUG with a view to amending (if required) any legislative impediments to utilising its budget to contract in necessary human resources.
ESG 3.4	<ol style="list-style-type: none">6. That ACSUG, at leadership and governance level, commits to a programme of work on thematic analysis to be undertaken on a regular basis commencing in 2024 and puts in place the resources to carry out the work.
ESG 2.1	<ol style="list-style-type: none">7. The panel recommends that the requirements of ESG 1.4 be directly addressed and the principles of The Lisbon Recognition Convention be incorporated in procedures as well as cooperation with HEIs, Spanish ENIC-NARIC and other relevant bodies established for promotion of fair recognition

	and ensuring coherent recognition practices across the Galician university system.
ESG 2.7	<p>8. The terms of reference of the Review Committee should be amended to create a complete separation between it and the CGIACA.</p> <p>9. The Chair of the CGIACA should not attend the meetings of the Review Committee.</p> <p>10. The process for selection of members of the Review Committee should be amended to create an open competition with clear statements of the criteria used for selection.</p> <p>11. All institutions in the system should be given full information on the role of the Review Committee.</p> <p>12. All reviewers on panels should be fully briefed on the Review Committee.</p>

In light of the documentary and oral evidence considered by it, the panel is satisfied that, in the performance of its functions, ACSUG is in compliance with the ESG.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.1	<p>1. The panel suggests that ACSUG produce annual reports that are linked to its mission and strategic goals and make them accessible to the public. Such reporting would help promote the internal reflection and improvement, and increase transparency and contribute to better recognition of ACSUG's work.</p> <p>2. The panel suggests that the terms of reference and operational guidelines of the Governing Board include specific reference to the role of the Governing Board in overseeing and monitoring the strategic plan of the agency.</p>
ESG 3.3	<p>3. The panel suggests that international members are appointed to all bodies of ACSUG. The agency may use a variety of means (including launching a public call or consulting with other agencies) to identify potential international members for its committees.</p>
ESG 3.4	<p>4. The panel wishes to draw the agency's attention to the recommendation of the 2019 panel that, pending the appointment of additional staff, the agency could re-examine options for outsourcing part of the work on thematic analysis or seek other innovative ways to address the task, e.g. by using the AI.</p> <p>5. That staff and CGIACA work collaboratively to select the regionally appropriate topics for thematic analysis.</p> <p>6. Output of thematic analysis on programme and institutional levels in relation to developments, trends and areas of good practice or persistent difficulty could feed well into discussions with institutions and could further promote quality culture development and support the institutional responsibility for quality assurance.</p>
ESG 3.5	<p>7. A dedicated staff development programme (adequately resourced) could be put in place to create learning partnerships with other agencies. This should be available to staff and to members of the CGIACA. This programme should also include a significant element of foreign language skill acquisition.</p>

	<p>8. ACSUG's human resources capacity needs expansion to enable better coping with the workload and to reduce stress.</p>
ESG 3.6	<p>9. The panel suggests that ACSUG strengthen the enhancement focus of its activity and realigns its quality manual with this objective.</p> <p>10. The panel encourages ACSUG to examine the extent to which its communication with international external authorities and institutions is sufficiently robust so as to protect ACSUG's own position and enhance the understanding of its role as a quality assurance agency.</p>
ESG 2.1	<p>11. The panel suggests that the review panel members be surveyed systematically at the end of each review and that their recommendations on streamlining administrative procedures be considered.</p> <p>12. All reports, including negative ones, both for procedures within Galicia and internationally, need to be published by the agency and on the DEQAR.</p> <p>13. Reports shall contain names of the expert panels as is the practice of other agencies.</p>
ESG 2.7	<p>14. Stakeholder representation on The Review Committee should be strengthened by the inclusion of a student member.</p> <p>15. The Review Committee should produce an annual report that includes recommendations for changes in ACSUG's policies and procedures.</p>

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
Pre-visit				
#1.1 15/01/2024	120 min	Review panel's kick-off meeting and preparations for site visit	<i>Review panel: Aurelija Valeikienė, Chair Marion Coy, Secretary Jordi Villà Freixa, Panel Member Damir Solak, Panel Member Goran Dakovic, ENQA Review Coordinator Blazhe Todorovski EQAR</i>	Aurelija Valeikienė
#1.2 23/01/2024	60 min	2 nd Review Panel meeting -consider schedule, additional documents, and agency enhancement one-page document	<i>Goran Dakovic Review Panel</i>	Aurelija Valeikienė
#1.3 01/03/2024	90 min	3 rd Review Panel preparatory meeting	<i>Review panel Goran Dakovic</i>	Aurelija Valeikienė
#2 05/03/2024 15.00-16.30 CET	90 min	An online clarifications meeting with the agency's resource persons to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standards for enhancement (next to the overall HE and QA context of the agency)	Agency Contact person ACSUG Quality and International Relations Manager ACSUG Director	Aurelija Valeikienė
On-site visit DAY 0				

#3 17.00-19.30	150 min	Review panel's pre-visit meeting and preparations for day I (at hotel)		Aurelija Valeikienė
On-site visit DAY I				
08.00-8.30	30 min	Review panel's private meeting		
#4 08.30-09.30	60 min	Meeting with the CEO ESG 2.1, 2.7, 3.3, 3.4, 3.5, 3.6	ACSUG Director	Aurelija Valeikienė
09.30-09.45	15 min	Review panel's private discussion		
#5 09.45-10.45	60 min	Meeting with Chair and members of Governing Body ESG 2.1, 2.7, 3.3, 3.4, 3.5, 3.6	President of ACSUG. Professor of Animal Health at USC. Chair of the Social Council from the USC Chair of the Social Council UVIGO Chair of the Social Council from the UVIGO. Member of the Governing body in representation of the Galician Ministry of Treasury and Public Administration Academic Member. Professor of Applied Economics at USC Student Member. Student at UDC	Aurelija Valeikienė
10.45-11.00	15 min	Review panel's private discussion		

#6 11.00-12.00	60min	Meeting with the Chair and Members of CGIACA ESG 2.1, 2.7, 3.3, 3.4, 3.5, 3.6	CGIACA Chair. Professor of Theory and History of Education at USC. Academic Member. Professor of Marketing Research at USC Academic Member. Professor of German Philology at USC (Online) Academic Member. Professor of microbiology at UDC (Online) Academic Member. Professor of didactics and school organisation at UVIGO Academic Member. Structures and Continuous Media Mechanics Professor at the UDC (Online) Student Member. PhD student at the UVIGO.	Jordi Villà Freixa
12.00-12.45	45min	Lunch (panel only)		
#7 12.45-13.45	60 mins	Meeting New Review Committee ESG 2.1, 2.7, 3.3, 3.6	Chair. Professor of Labour Law and Social Security at UDC Member. Professor of Theory and History of Education at USC Member. Professor of Stratigraphy at UVIGO Secretary without voting rights. Member of ACSUG staff in the Teaching Unit.	Damir Solak
13.45-14.00	15 mins	Review panel's private discussion		

#8 14.00-15.00	60min	Meeting with key staff of the agency/staff in charge of external QA activities ESG 2.1, 2.7, 3.4, 3.6	Quality and International Relations Manager Technician in the Programmes Unit Technician in the Programmes Unit Technician in the Programmes Unit Technician in the Programmes Unit	Jordi Villà Freixa
15.00-15.15	15 min	Review panel's private discussion		
#9 15.15-16.00	45min	Meeting with key external organisation /entity that has a significant relationship with ACSUG	(Online) REACU Member. Director of the Madri+d Knowledge Foundation. (Online) REACU Member. Director of the Balearic Agency for Quality Assurance in Higher Education (AQUIB).	Damir Solak
16.00-16.15	15 mins	Review panel private meeting		
#10 16.15-17.15	60 mins	Meeting with Agency Staff from Finance, HR, External Communications, Data management and Analytics, General Administration. ESG 3.3, 3.4, 3.5, 3.6	Technician in Finances and HR Technician in Cabinet of Direction Technician in Computer Services Administrative Staff	Aurelija Valeikienė
#11 17.15-18.15	60 min	Tour of premises and Wrap-up meeting among panel members and preparations for day 2	Tour of Premises (20 minutes) followed by private panel meeting	Aurelija Valeikienė
		Dinner (panel only)		
On-site visit DAY 2				
08.00-08.30	30 min	Review panel's private meeting		

#12 08.30-09.30	60 mins	Meeting with regional public authorities ESG 2.1, 3.3, 3.4, 3.5	Galician Secretary General for Universities Galician Deputy Director of Universities	Aurelija Valeikienė
09.30-09.45	15 min	Review panel's private discussion		
#13 09.45-10.45	60 min	Meeting with Heads of 4 reviewed HEIs ESG 2.1, 3.3, 3.4	Rector of the USC Rector of the UDC Rector of the UVIGO Secretary General of UIE	Jordi Villà Freixa
10.45-11.00	15 min	Review panel's private discussion		
#14 11.00-12.00	60 min	Meeting with quality assurance officers of HEIs ESG 2.1, 2.7, 3.3, 3.4,	Vice-rector for Quality Matters at USC. Assistant to the Vice-rector for Quality Matters at USC. Vice-rector for Quality Matters at UDC. Director of the Quality Assurance Office at UDC Director of the Quality Assurance Office at UVIGO Responsible for Quality at UIE	Damir Solak
12.00-12.45	45min	Lunch (panel only)		

<p>#15 12.45-13.45</p>	<p>60 min</p>	<p>Meeting with representatives from the reviewers' pool ESG 2.1, 2.7, 3.3, 3.4, 3.6</p>	<p>(Online) International Academic Reviewer in engineering. Professor in the Aveiro University (Portugal) (Online) International Academic Reviewer in Social Sciences. Professor in the Università degli Studi di Napoli Federico II (Italy) National Reviewer in Social Sciences. Journalism Professor at the Madrid Complutense University (Spain). (Online) National Reviewer in Sciences. Organic Chemistry Professor at the Madrid Complutense University (Spain) Professional reviewer. Professional auditor at the Trillium Consulting company in Galicia Student reviewer. Student of Psychology at the USC.</p>	<p>Jordi Villà Freixa</p>
<p>13.45-14.00</p>	<p>15 min</p>	<p>Review panel's private discussion</p>		

#16 14.00-15.00	60 min	Meeting with stakeholders, such as employers, students, local community ESG 2.1, 3.3, 3.5	<p>Representative of the statistical analysis group of the labour insertion studies. Professor at the Department of Statistics, Mathematical Analysis and Optimization at the USC.</p> <p>(Online) International Member in the ACSUG Advisory Council from the Dominican Republic. PhD in Organisational Studies at the State University of New York at Albany.</p> <p>(Online) Collaborator in the design of the current ACSUG Code of Ethics. Law Professor at the UVIGO.</p> <p>(Online) Student representative with collaboration in different ACSUG activities. Law Graduate at the UVIGO and Student in the Master's Degree in International Law at ISDE.</p>	Damir Solak
15.00-15.15	15 min	Review panel's private discussion		
#17 15.15-16.10	55 min	Enhancement session I ESG 3.5	<p>Collaborator in the design and development of the ACSUG Strategic Plans 2016-2020 and 2024-2028. Algebra Professor at the USC.</p> <p>ACSUG Technician in Finances and HR.</p> <p>ACSUG Technician in the Programmes Unit</p> <p>ACSUG Technician in the Teaching Staff Unit.</p>	Aurelija Valeikienė
16.10-16.20	10 mins	Private panel meeting		

#18 16.20-17.15	55 min	Enhancement Session 2 ESG 3.6	<p>Celso Rodríguez Fernández Collaborator in the design and development of the ACSUG Strategic Plans 2016-2020 and 2024-2028. Algebra Professor at the USC.</p> <p>Aitor Martínez Lafuente ACSUG Technician in Finances and HR.</p> <p>María Dolores Castro Pais ACSUG Technician in the Programmes Unit</p> <p>Francisco Rico Rey ACSUG Technician in the Teaching Staff Unit.</p>	Aurelija Valeikienė
17.15-18.00	45 mins	Panel private Meeting		
On-site visit DAY 3				
09.00-10.00	60 min	Private Meeting among panel members to agree on final issues to clarify		Aurelija Valeikienė
#19 10.00-11.00	60 min	Meeting with CEO to clarify any pending issues	ACSUG Director	Aurelija Valeikienė
#20 11.00-12.30	90 min	Private meeting between panel members to agree on the main findings	May be extended if necessary	Aurelija Valeikienė
12.30-13.15	45min	Lunch (panel only)		
#21 13.30-14.00	30 min	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	ACSUG Director All ACSUG staff	Aurelija Valeikienė

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Targeted review of Agency for Quality Assurance in the Galician University System (ACSUG) against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between ACSUG (applicant), ENQA (coordinator) and EQAR.

August 2023

1. Background

Agency for Quality Assurance in the Galician University System-ACSUG has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Agency for Quality Assurance in the Galician University System-ACSUG has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2009 and is applying for renewal of ENQA membership.

ACSUG is carrying out the following activities within the scope of the ESG:

At programme level:

- Assessment cycle of Galician degrees: *validation* (ex-ante accreditation), *monitoring, modifications and accreditation* (cyclical process).
- Joint programme accreditation
- Accreditation of degrees and university centres outside Spain (international ex-post accreditation and monitoring)
- ~~Evaluation of art degrees~~¹¹

At institutional level:

- Institutional accreditation

¹¹ The evaluation of art degrees activity has been used as a pilot procedure and as reported by ACSUG will not be used in the future. In case ACSUG decides to reintroduce this procedure, it should inform EQAR at its earliest convenience.

- Institutional monitoring¹²
- Assessment of institutional QA systems (FIDES-AUDIT)
- Assessment of institutional QA systems international (FIDES-AUDIT international)
- Teaching performance assessment programme (DOCENTIA)

The institutional monitoring activity (*) is expected to suffer substantive changes, once the new regulation is in place. Such changes are expected to be addressed by the review if they take place before the review is concluded (before the site visit of the panel).

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG:

- Assessment of academic staff
- Research evaluation activities
- Labour market insertion studies

While these activities are not relevant to the application for renewal on EQAR, it is ACSUG's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

2. Purpose and scope of the targeted review

This review will evaluate the extent to which ACSUG continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support ACSUG's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

- A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
 - a. ESG 2.7 due to a lack of an independent appeals board. The review should explore further whether the agency operationalised its plans to

¹² The institutional monitoring activity is expected to suffer substantive changes, once the new regulation is in place. Such changes are expected to be addressed by the review if they take place before the review is concluded (before the site visit of the panel).

establish such a body and explore the procedures for nomination of its members.

- b. ESG 3.3 due to the direct involvement of the Galician Government in the appointment of the majority of members in the agency's governing body, in the appointment of president of the Governing Body, the president of the agency's decision-making body (CGIACA), the director of the agency and the president of the Advisory Council.
- c. ESG 3.4 due to scarce publishing of thematic analyses. The review should further explore the implementation of the plans regarding the setup of external working groups for developing thematic analysis and further collaboration with other bodies. The review should look into whether the agency developed a system for creating and publishing thematic analysis.

B) Standards 2.1 to 2.7 for the following activities:

- a. n/a;

C) Standards affected by other types of substantive changes:

- a. n/a

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.5 Resources, ESG 3.6 Internal quality assurance and professional conduct

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

G) These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, ACSUG and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by ACSUG including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ACSUG;

- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to ACSUG during the past 5 years, and conversely ACSUG has not provided any remunerated or unremunerated services to the coordinator.

3.2 Nomination and appointment of the review team members

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide the agency with the proposed panel composition and the curricula vitae of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

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

3.3 Self-assessment by ACSUG, including the preparation of a self-assessment report

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

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which ACSUG fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency

publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to ACSUG at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

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

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR¹³.

¹³ See here: <https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2.0-2015.pdf>

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If ACSUG chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by ACSUG and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to ACSUG the [Declaration of Honour](#) together with the final report.

4. Publication and use of the report

ACSUG will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in autumn 2024. The Register Committee's final

judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	August 2023
Appointment of review panel members	November 2023
Self-assessment report (SAR) completed by ACSUG	15 December 2023
Screening of SAR by ENQA Review Coordinator	December 2023
Preparation of site visit schedule and indicative timetable	January 2024
Briefing of review panel members	January 2024
Review panel site visit	End-March 2024
Submission of the draft review report to ENQA Review Coordinator	Mid-May 2024
Factual check of the review report by the ACSUG	End-May 2024
Statement of ACSUG to review panel (if applicable)	End-May 2024
Submission of review report to ENQA	June 2024
Validation of the review report by the Agency Review Committee	September 2024
EQAR Register Committee meeting and decision on the application by ACSUG	Autumn 2024
Decision on ENQA membership by the ENQA Board	Autumn 2024

ANNEX 3: GLOSSARY

ACSUG	Agency for Quality Assurance in the Galician University System
BSc	Bachelor of Science
CGIACA	Galician Committee for reports, Assessment Certification and Accreditation
DOCENTIA	Teaching Performance Assessment
ECA	European Consortium for Accreditation
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
FIDES AUDIT	Assessment of Institutional QA systems
HE	higher education
HEI	higher education institution
INQAAHE	International Network for Quality Assurance in Higher education
INTEC	San Domingo Technological Institute
MSC	Master of Science
REACU	Spanish Network for University Quality Assurance Agencies
QA	quality assurance
SAR	self-assessment report
SUG	Galician University System
UDC	University of A Coruña
UIE	Intercontinental University of Business
USC	University of Santiago de Compostela
UVI	University of Vigo

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ACSUG

1. Decree 6/2018, of 11 January, approving the statutes of the Agency for Quality Assurance in the Galician University System consortium.
2. ASCUG statutes, published in Diario Oficial de Galicia No. 20 Monday, January 29, 2018
3. Support guide for the evaluation prior to the verification of official university degrees (Bachelor and Master). V2, February 2022.
4. Evaluation guide for monitoring and renewal of the accreditation of official degrees (Bachelor and Master). V3, April 2023. (http://www.acsug.es/sites/default/files/guia_seg-acred_grado_y_msster_v2_abril_2023_.pdf)
5. Procedure for requesting modifications to Bachelor's and Master's Degrees. v.2, March 2023. (http://www.acsug.es/sites/default/files/Guia%20Modificacion%20G-M_Marzo-2023_Publicacion_web.pdf) Procedure for requesting modifications in Doctoral Programs. 2023.
6. Evaluation guide for university degrees external to the Spanish University System with annexes. v2, October 2023. (<http://www.acsug.es/sites/default/files/240418.pdf>)
7. Evaluation guide for the implementation of quality assessment systems (FIDES-AUDIT). July 2015 (http://www.acsug.es/sites/default/files/Gu%C3%ADa%20para%20la%20certificaci%C3%B3n%20de%20la%20implantaci%C3%B3n%20de%20los%20SGC_I.pdf)
8. DOCENTIA program; 2015. (http://www.acsug.es/sites/default/files/documentacion_programa_docentia_2015.pdf)
9. Review Committee (<http://www.acsug.es/en/acsug/revision>)
10. Resolution on Review Committee of Tuesday, 15 February 2022 (with the Protocol defining the procedure of the resolution of claims and complaints filed with ACSUG in Annex I) (https://www.xunta.gal/dog/Publicados/2022/20220215/AnuncioO601-040222-0001_es.pdf)
11. Minutes of Review Committee Meetings for 2023
12. Minutes of the Governing Body Meetings (2019-2024)
13. Internal Quality Assurance manual, Edition #8, dated 31/01/2024 with Annexes
14. List of CGIACA former and current members with the length of mandate of the current ones (March 2024)
15. Attendance Records for Governing Body and CGIACA from 2019
16. Annual Work Plans (2021-2025)
17. Reports of the President to the Governing Board (2019-2023)
18. ASCUG Financial reports (<http://www.acsug.es/en/acsug/transparencia/contas>)
19. ASCUG Budget for 2024 with projections for 2025 and 2026
20. Overview of the employees of ACSUG with the allocation to the agendas
21. Draft of the ACSUG Strategic Plan 2024-2028 (version 20-12-2023).
22. Progress Report by ACSUG to ENQA (30 September 2021) and its update from 2024
23. ACSUG Code of Ethics (2021)
24. Table of statistics of activity of new Appeals Committee (2019-2023)
25. Law 6/2013 on the Galician University System
26. Rules of Procedure of the CGIACA (September 30th, 2009)
27. Annual staff training plans (2019-2023)
28. Complementary information of the self-selected areas for the enhancement session (March 5, 2024)

29. ANÁLISIS TEMÁTICO LOS ESTUDIOS UNIVERSITARIOS DE INFORMÁTICA Y TELECOMUNICACIONES, Agencia Andaluza del Conocimiento, Dirección de Evaluación y Acreditación et al. (2021)
30. ANÁLISIS TEMÁTICO LOS ESTUDIOS UNIVERSITARIOS DE GRADUADO/A EN ENFERMERÍA, Agencia Andaluza del Conocimiento, Dirección de Evaluación y Acreditación et al. (2021)
31. ACSUG Management system indicators (March 2024)
32. Royal Decree 822/2021, of 28 September, which establishes the organisation of university education and the procedure for quality assurance.
33. Signed contracts between ACSUG and Technological Institute in the Dominican Republic. (INTEC)
34. Reports from the Advisory Board (2020, 2023)

OTHER SOURCES USED BY THE PANEL

1. ACSUG Website <http://www.acsug.es/en>
2. Confirmation of Eligibility: Application for Inclusion on the Register. EQAR, 12 July 2018.
3. Approval of the Application by Agency for Quality Assurance in the Galician University System (ACSUG) for Renewal of Inclusion on the Register. EQAR Register Committee, 2020-03-18.

ENQA TARGETED REVIEW 2024

THIS REPORT presents findings of the ENQA Targeted Review of the Agency for Quality Assurance in the Galician University System (ACSUG), undertaken in 2024.