



ESTONIAN QUALITY AGENCY
FOR HIGHER AND VOCATIONAL EDUCATION

Assessment Report on Meeting the Requirements of
the Secondary Condition of Institutional Accreditation

Yerevan Haybusak University

2021

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Introduction

Background and aim of the assessment

'Institutional accreditation' is the process of external evaluation which assesses the conformity of a University or higher education institution's management, work procedures, study and research activities and environment to both legislation and the goals and development plan of the higher education institution itself. This is feedback-based evaluation in which an international expert panel analyses the strengths and weaknesses of the institution of higher education based on the self-assessment report of the institution and on information obtained during the assessment visit, providing recommendations for improvement and ways of implementing them.

The goal of institutional accreditation is to support the development of strategic management and quality culture that values learning-centeredness, creativity and innovation in the higher education institutions (HEIs), as well as to increase the societal impact of education, research and development delivered by the HEIs.

Educational institutions must undergo institutional accreditation at least once every seven years based on the regulation approved by EKKK Quality Assessment Council for Higher Education (hereinafter EKKK Council) [Guide to Institutional Accreditation](#).

The institutional accreditation of Yerevan Haybusak University took place in 2019. EKKK Council decided, at its meeting on 22.11.2019, that the next accreditation is to take place in three years if the HEI meets certain requirements set by the EKKK Council.

The task of the current expert panel was to evaluate whether the requirements (secondary conditions) set by the EKKK Council have been met by Yerevan Haybusak University.

The following persons formed the expert panel:

Name	Jacques Lanares, Vice Rector, University of Lausanne, Switzerland
Name	Helen Thomas, Educational Consultant, UK

Assessment process

The higher education institution sent its progress report on the fulfilment of the requirements of the secondary condition to EKKA on 24.12.2020.

The members of the expert panel wrote the report based on the written materials presented by the HEI and the information obtained in the interviews held (electronically) on 16,17 and 18 May 2021

In the following sections, the expert panel summarises their findings regarding the fulfilment of the secondary condition and provides feedback on the progress the HEI has made in connection with experts' recommendations made in the institutional accreditation report in 2019.

The institution did not have any clarifications or comments on the report. The panel submitted the final report to EKKA on 21.06.2021.

The current report is a public document and made available on EKKA website after EKKA Council has made its decision.

Context of the assessment visit

Work on the secondary conditions and progress on recommendations of the 2019 Assessment Report were undertaken during the period of the global Covid-19 pandemic and during the war in Armenia.

General assessment of the actions taken by Yerevan Haybusak University with regard to improvement areas presented in the EKKA Council decision on 22.11.2019.

Comments

YHU took a comprehensive approach to the recommendations in the report from the accreditation visit in 2019. The University listed the overwhelming majority of recommendations in a table and indicated the actions they planned to take. It was clear to the Panel that YHU had undertaken much activity and produced new documentation. This included revisions to the Scientific Council, a new constitution for the Ethics Committee, revised strategic plans at institutional level and for specific areas including Internationalisation, Public Relations and Media, and Research and Creative Activity; revised job descriptions for many roles in the University, and development of learning outcomes. Evidence of prioritisation and strategic thinking, however, was lacking. Specifically, there was nothing to indicate that YHU had prioritised actions to meet the two secondary conditions over action addressed at the recommendations in the report. The rationale for the revised strategic plans was lacking and, significantly, the Panel saw no mention of YHU's revisions to its Vision, Mission and Values. Overall, the Panel found that initiatives and action are taken managerially rather than strategically.

Further considerations

- YHU must identify and articulate its strategic priorities.
- YHU should revise its overall strategic plan so that it clearly reflects the identified strategic priorities.
- YHU should revise strategic plans for its other areas of activities so that they clearly align with the priorities identified in the overall strategic plan.
- YHU should separate out operational plans from the strategic plans.

- YHU should ensure that there is a manageable number of key performance indicators which are specific and measurable and which thus enable management to monitor progress.
- YHU should ensure that operational targets are specific, that responsibility for achieving them is clearly defined so that their achievement can be demonstrated.

Report on meeting the requirements of the secondary conditions

General background

At its meeting on 22.11.2019, EKKA Council decided that the next institutional accreditation of Yerevan Haybusak University will take place in three years but set a secondary condition that the University must meet within one year.

Meeting of the requirements of the secondary condition

The following are the requirements set by the EKKA Council to be met by Yerevan Haybusak University, and the expert panel's assessment on the developments Yerevan Haybusak University has made in this regard.

YHU should elaborate fully developed strategic plans, which are based on an in-depth and evidence-based analysis, which include specific targets to ensure that priorities are clearly identified and that goals are measurable.

Assessment of the expert panel: the secondary condition is not met

Evidence and analysis

YHU developed a revised strategic plan (SP) for the period 2021-2025. The Panel learned that YHU undertook some analysis of the previous plan and identified its strengths and weaknesses. The Panel also learned that the individual institutes and structural units developed their own strategic plans which contributed to the overall institutional strategic plan. The Rector has authority for the final approval of the SP.

The SP comprises the Mission of YHU, the Vision of YHU, the 9 Fundamental Values of YHU, the Goals, Objectives and actions or activities for the objectives and Key Performance Indicators (KPIs). Stating the mission, vision and values of a university in the strategic plan is common and accepted practice. The aims, goals and strategic level objectives should align with the mission, vision and values. In discussions with staff the Panel learned how YHU had analysed the previous plan to identify strengths and weaknesses but heard nothing to indicate that YHU had analysed its mission, vision and values. A comparison of the new SP with the previous SP shows that YHU had revised its mission, its vision and its fundamental values. The Panel did not hear any evidence in any meeting or see any documents that mentioned these revisions, provided the rationale for them or anything about how YHU

undertook the process of revision. This is surprising given the fundamental importance of mission, vision and values as a basis for the strategic plan and for shaping the identity and strategic direction of YHU.

The new SP has eight goals. These are: (1) Assurance of High Quality of Education; (2) Assurance of Potential of High Quality Human Resources and Efficient Management; (3) Expansion of the Scope of YHU Learners in the Quickly Changing Environment; (4) YHU Social Responsibility and Support; (5) Assurance of Financial Sustainability and Efficient Resource Management of YHU; (6) Development of Information Resources of YHU, Expansion of the Scope of Use of Information Technologies; (7) Assurance of Sustainable Development of YHU's Scientific Potential and Increase of Efficiency of Research Activities, and (8) Expansion of External Relations and Development of International Processes of YHU. There are links and overlaps between the values and the goals. Each goal has between 2 and 4 objectives totalling 22. Each objective then has a number of activities or sub-objectives ranging between 3 and 19 in number, with a total of over 150. The sub objectives/activities include words like *monitoring, development, revisions, establishing, ensuring, expanding, envisaging*. These activities are rarely specific and not expressed in a way that makes it clear how they can be measured and, in some cases, how they can be met. For example: *"To monitor the concept and organigram of formulation of YHU's system of quality assurance and evaluation by clearly differentiating the functions of structural units and management structures and by defining respective procedures."* (SP 1.1.1) *"To ensure the efficiency of hybrid process for students and employees."* (SP2.2.4); *"To have a stable environment for social-cultural adaptation of foreign students"* (SP3.2.10); *To take initiatives towards ensuring the application of online/distance educational technologies in continuous and additional education systems.* (SP3.3.5) The level of detailed activity presented in these activities or sub-objectives more properly belongs in an operational plan. An operational plan would normally show alongside the objectives and associated activities, the schedule or phasing for different activities together with the deadlines by which they should be completed.

The number of objectives and associated activities demonstrates a lack of focus and prioritisation. As a result, the Panel was unable to ascertain YHU's overall institutional strategic priorities.

The SP includes KPIs for each of the eight goals. There are between 5 and 13 KPIs for each of the goals with a total of 68 for the plan. The number KPIs is unusually high. Monitoring so many KPIs is a challenge. Some of the KPIs are relatively specific. For example, *Percentage of staff turnover; retention during the year (not more than 7%); Increase of mobility indicators of YHU students and teachers in foreign institutions (assurance of at least 30%), starting from 2021; Established cooperation with state and non-state/private organizations, state and local governing bodies and international universities*. Many of the KPIs are, however, vague. For example, *Ensured favorable conditions and mechanisms fostering the enhancement and control of teaching and learning quality; Formulated socially stable and positive environment and social cooperation*. A number are not really KPIs at all, as for example: *Established institutes at YHU due to which the University ensures:*

- *efficient management of the main spheres of YHU's activity through profile councils established in the institutes,*
- *optimal distribution of authorities and liabilities,*
- *autonomy and transparency of decision making,*
- *autonomous administration and collegiality.*

The Panel found that overall, the KPIs do not relate to goals, and do not enable progress on meeting the goals to be measured.

The Panel learned that the development of the SP had been a collective and collegial process with a bottom-up approach. The Panel also learned that the plans from the different structural units and institutes had been discussed in the Scientific Council before being finalised and signed off by the Rector. The approach YHU takes encourages staff to come forward with suggestions and ideas and involves them in the planning process. However, the lack of strategic leadership within the process to ensure that priorities are clearly defined, and parameters set, has resulted in an SP which fails to have clear priorities and has a proliferation of objectives and KPIs.

The Panel also reviewed the *Strategy of Internationalisation of YHU 2021-2025*; the *2021-2025 Strategic Plan for Scientific Research and Creative Activities*, and the *Strategic plan of Public Relations and Media Division 2021-2025*. Each of these identified four *directions*. The plans are presented consistently in tabular format. For each *direction* there is a row for each objective and each objective has a column for *activity, resources, expected outcome* and *time*. These plans combine the strategic aim i.e. the *direction* and an operational plan. Whilst the objectives have outcomes, some of which are specific and measurable, there is no overall measure for the directions. The Panel heard that plans are interconnected and inter-related. However, how the unit plans reflect and feed into the overall institutional strategic plan is not clear.

Conclusion

YHU has developed an institutional strategic plan and strategic plans for structural units and for internationalisation, research, public relations and media. However, the Panel did not find that these had been based on an in-depth and evidence-based analysis, nor did the plans include specific targets to enable priorities to be clearly identified. Only in a minority of cases were goals demonstrably measurable.

Areas of concern and recommendations

- The new strategic plan does not reflect common practice: it is not focussed on the strategic aims, key high level objectives and related KPIs and priorities are not clear. YHU should review and revise the strategic plan to reflect common practice so that it focusses on goals, high level objectives and KPIs for the five-year period.
- The strategic plan includes details that properly belong in an operational plan which confuses everyday management activity with strategic leadership. It is not always clear where responsibility lies for ensuring progress on achieving the detailed objectives. YHU should develop a separate operational plan that details the sub-objectives and activities with clear responsibilities, time frames and deadlines which can be reviewed on at least an annual basis.
- YHU has set a large number of KPIs which are often not measurable and are not clearly related to the goals. YHU must develop KPIs that are specific and measurable and that clearly relate to the goals. The Panel further recommends that the number of KPIs does not exceed 20.
- Whilst the approach YHU has taken to the development of the strategic plan encourages the engagement of staff, the process lacks strategic leadership which needs to ensure that the plan focuses on the key strategic priorities. It is recommended that YHU ensures that the process of development and decision making on strategic plans has stronger strategic leadership.
- The strategic plans for different fields and units are consistent in presentation. How the aims relate to the overall YHU strategic plan, however, is not clear. YHU should further develop the strategic plans of the units, so that the strategic aims (directions) have associated outcomes

which link clearly and directly to the strategic aims of YHU's Strategic Plan so that strategic direction is strengthened.

Opportunities for further improvement

- YHU would benefit from exploring how other higher education institutions develop and revise their mission, vision and values and ensure the strategic alignment of them with strategic aims.
- YHU is also advised to separate the detailed operational plan from the unit strategic plans.

YHU should develop a more strategic approach to the development of its research capacity and should include specified support for staff to engage in research. YHU should include requirement to undertake research to the contracts of full-time academic staff.

Assessment of the expert panel: the secondary condition is partly met.

Evidence and analysis

One of the eight goals of YHU's Strategic Plan is related to research: *"Assurance of sustainable development of YHU's scientific potential and increase of efficiency of research activities."* (Goal 7) where YHU states the importance of research for the University and its commitment *"to ensure maximum involvement of main teachers' potential and students in research projects."* There are three objectives linked to this goal which are as follows:

- *To make the postgraduate (PhD) education (as 3rd level of higher education) implemented by YHU in compliance with the requirements of the labor market and with the National Qualifications Framework (NQF).*
- *To expand the scope of teachers' involvement in scientific research activities.*
- *To ensure the integration into the International European Research Area by means of international scientific collaboration.*

There are five KPIs for the three objectives; however, the KPIs do not lend themselves to measuring the achievement of the objectives.

In line with its overarching Strategic Plan, YHU has developed a strategic plan for Scientific Research and Creative Activities (SRCA) for the period 2021-2025. This plan has four *directions*:

1. *Establishment of new directions and basis for YHU scientific research and creative activities.*
2. *Continuous development of YHU scientific research activities and expanding international relations.*
3. *Monitoring of YHU study programs implemented at the 3rd level of higher education (PhD), assurance of their compliance with labour market requirements.*
4. *Assurance of students' involvement in scientific research activities.*

Each direction has 1 to 3 objectives, a list of related activities, resources, expected outcomes and execution deadline.

The strategic plan for Scientific Research and Creative Activities remains at a basic level and is not fully elaborated. For example, responsibilities are not clearly defined; resources are not specifically linked to activities; deadlines are not specific and mostly refer to the full period of the plan i.e. 2021-2025. A specific example of this for Direction 1 : *Establishment of new directions and basis for YHU scientific research and creative activities.*” One of the two goals for this direction is: “Establishment of Scientific Research Center of Rehabilitation Medicine.” The list of activities related to this are: “1. *Rehabilitation Medicine as a new priority of the 21-25 five-year Strategic Plan.*

2. *Allocation of space for the Rehabilitation Center in the building of “Haybusak Clinic”, furnishing and assurance of technical equipment.*

3. *Establishment of a scientific group dealing with current problems of Rehabilitation Medicine, development of respective research program.*

4. *Allocation of two placements for postgraduate / PhD studies.*

5. *Establishment of cooperation with the RA and foreign healthcare and scientific organization.”*

The human and logistics resources which are mentioned to support these activities are: “Medical staff, PhD students, Scientific Department, Chair of Rehabilitation Medicine. Logistic base for the Center, YHU’s financial allocations.” The related expected outcomes vary; some are clear and measurable such as: two placements for PhD students whilst others are rather broad such as “cooperation network” for instance.

All four *directions* and their associated objectives are similarly articulated and demonstrate that the strategic approach still needs further development. The Panel found it difficult to establish the logical links between the different levels of the plan and could not see clearly how the main priorities are operationalized in the objectives and activities. Moreover, the plan does not provide a sound or robust basis for monitoring its implementation. The Panel did not see evidence of any more detailed planning to implement the Scientific Research and Creative Activities strategic plan.

Staff from YHU described the development of the SRCA plan as a bottom up approach with discussions at the level of academic staff. Staff also reported that the plan aligned with national research priorities. The final version of the SRCA plan was prepared by the heads of department and the Vice Rector for Research and then approved by the Scientific Council.

It was not clear to the Panel how specific priorities, other than those for clinical medicine, had been set. Priorities mentioned during the online visit were broad, including ‘study and issues concerning Armenia’ within the field of economics or ‘agro business and tourism.’ The rationale underpinning these choices which might, for example, include how they reflect existing research strengths in the University, or are particularly relevant for YHU’s profile, was not developed.

As a university, YHU undertakes and wants to develop its research. However, in a context of limited resources and/or capacity, universities have to set priorities for their research activities. This means they have to focus on some specific areas or topics in order to reach a critical mass and achieve visibility. Whilst not all research activity within a university will relate to the priority areas, the main focus and the majority of the funding will relate to the priority areas. The identification of the areas depends on the context. In some cases, they are based on pre-existing institutional strengths; or on

potential innovative cross-fertilization between departments, or to address pressing societal issues, for example. The rationale may be diverse and the focus more or less narrow. Whatever the rationale for the selection, priorities must be set in relation to the university's strategic priorities and positioning. This does impact on resource allocation and also on staff recruitment. In turn a clear research profile and high visibility in some areas can attract high level researchers.

The Panel did not see evidence of such reflections and discussion in YHU. The main area highlighted as a research priority is the medical rehabilitation centre. This clearly reflects the high proportion of medical students at YHU. However, the SRCA does not elaborate on what kind of research will be undertaken or what issues tackled in the rehabilitation centre. Furthermore, the Short Term Research Development Plan (2020) (annex 1.11.2 – Objective 5 section 3) mentions 4 key research areas as intended outcomes and indicates “*completed*”. The related text, however, refers to annex 1.1.1 and 1.11.1 in which there are 4 directions but nor real scientific priorities. The content of the short-term development plan shows an overlap between strategic and operational plans as, for example, in Direction 3 which states “*Monitoring of YHU study programmes at 3rd level higher education.*”

In addition to the SRCA plan, YHU has taken a number of steps to support research activities. The role and remit of the Scientific Council have been modified (30 October 2020) to include new dispositions regarding research with the aim of developing research management. In the revised remit the Scientific Council now:

- 1) *declares the five-year-term strategic directions of the University's scientific research activities,*
- 2) *approves the short-term and mid-term plans of the scientific activity,*
- 3) *hears the reports made by the heads of the scientific units about the results of research, scientific-methodical and creative activities carried out in prioritized directions set in the field of YHU's scientific research, and makes decisions, upon necessity,*
- 4) *guarantees the publication of scientific monographs, scientific-methodical works, textbooks, educational manuals and scientific collections.*

YHU has also revised the 2018 regulation for the rating of academic performance. A comparison of the revised document with the 2018 version shows some modifications; however there is no significant change regarding the weight given to research activities, which would reflect the emphasis on research that YHU aspires to. The Panel heard no evidence which indicated that any action had been taken, even in the form of initial discussions, to address that part of the condition which includes a contractual requirement for academic staff to undertake research.

YHU has created four PhD candidate positions which are offered through a competitive process to students able to publish three papers. This is a positive development. The Panel also learned that all master's students should attend classes on research methodology and understood from discussions that this was a new initiative for medical students but was already the practice for other fields.

YHU has planned budget to support research activities over the five year strategic plan period (2021-2025). The majority of the budget, circa 1600 million AMD¹ is allocated to infrastructural development for the Haybusak clinic, the Rehabilitation clinic centre, the clinic lab diagnosis centre, a dentistry policlinic and a legal clinic. YHU also plans to support research with resources for the library (5.5 million AMD). The budget includes 66 million to cover the costs of changes in the rating scale for academic staff. However the rating scale is not exclusively for research but includes the costs of promotions and

¹ 1 million AMD is worth approximatively 1500 €

rewards for teaching. The budget also includes allocations for publications (23 million AMD), conference participation (59 million AMD) and co-funding of grants, both local and international (36 million AMD). The budget allocated for the rehabilitation centre aligns with the first objective in the SRCA plan. The other budget allocations demonstrate a willingness to support research activities; however, in the absence of both clear base lines and measurable objectives, it is difficult to assess the relevance of the allocations to the objectives.

The Panel explored the aim for YHU to develop cooperation in research. The principle project described in this context was the development of the rehabilitation centre which is being undertaken by a Greek organisation, identified through a competitive tender. The rationale for developing the rehabilitation centre in this way was not clear to the Panel.

Conclusion

It is clear that YHU has undertaken some steps and some initiatives to develop the University's research capabilities. This is reflected in the budget set for research and associated activities. YHU has set some priorities for research for the five year period. However the Panel did not find an overall coherence to the plans and activities. Strategic management requires the setting of a strong direction, clearly identified and articulated priorities, the recognition for and the making of choices and a set of key performance indicators and measurements to enable progress and achievement to be demonstrated. The Panel found clear direction with linked priorities and measurements missing in the area of research and found that this reflected the weaknesses identified in institutional level strategic planning and management.

Areas of concern and recommendations

- The strategic plan for research and creative activity includes *directions* and objectives. Not all the *directions* are strategic in nature and related objectives are not always objectives but describe processes. The plan lacks strategic focus and consistently clearly articulated priorities. YHU must further develop a strategic approach to the development of its research capacity which clearly articulates priority areas and serves as a basis for identifying key objectives and related KPIs.
- YHU has identified funds to support research and has allocated the funds to different areas. However, with the exception of funding for the rehabilitation centre, it is not clear how budget allocations are related to the key priority areas. YHU should ensure that the support provided for research is clearly related to the identified priorities.
- The Panel found no evidence that YHU had discussed or taken steps to ensure that full-time academic staff have a contractual requirement to undertake research. YHU should include the requirement to undertake research in the contracts of full-time academic staff.

Opportunities for further improvement

- YHU should consider how it could use the resources offered by the association for the International European Research Area for international scientific collaboration to share experience with European colleagues in the development and implementation of research strategy.

General progress report

Yerevan Haybusak University (YHU) presented the *Report of Yerevan “Haybusak” University on the Improvement Ways and Activities based on EKKA’s Recommendations* (Report) as the submission to EKKA for the review of the secondary conditions set by the EKKA Council. This report, in tabular form, is organised by EKKA standards. Under each standard YHU has included a majority but not all of the recommendations from the 2019 Assessment Report. These recommendations are sometimes in the Objective column and sometimes in the Action column. The table includes a date column and an outcome column.

Some of the objectives are reasonably specific. For example, *“to develop a strategy of internationalisation of YHU and respective short-term, mid-term and long-term action plans deriving from it; development of job descriptions of teaching staff; re-development of regulation on final attestation of YHU graduates*. Others are rather non-specific and broad, for example: *assurance of raised awareness among students and potential applicants; fulfilment of useful activities for the community/society; more involvement of foreign students; assurance of awareness regarding activities of the EQA Centre*. In some cases, the action in the Action column repeats the objective or part of it; in others the actions are specific and broken down into steps. The date column is populated by specific months, broad time frames, for example, August-December, February-May, and some are continuous. The outcomes reported in the Outcome column include, in a few cases, some of the process that YHU undertook. For example, *YHU made an in-depth study of the content of the SDP 2016-2020, respective mid-term and short-term action plans implemented in the defined period as well as the performance after which the priorities and objectives deriving from them were set for 2021-2025. Further, the main provisions of SDPs of structural units were developed, and all the mentioned was reflected in the SDP 2021-2025. As a result of development of the SDP 2021-2025, YHU developed an action plan and ensured more transparency and interrelatedness between the action plan and the budget (App. 1.1.1.)*. Other outcomes state what has been established. For example: *A student estimation criteria have been established; or The policy and rules of the EQA Center activities in compliance with the YHU SDP have been re-developed; or Conducted webinars regarding the EQA Center activities, conducted by the EQA Center staff*. It is clear from the report table that YHU is committed to developing and strengthening its activities across the whole of the University. At the same time, many of the objectives and activities are neither specific nor measurable and it is not clear what the outcomes really are and how they are to be evaluated.

It is clear from the Report that there are some concrete achievements related to the recommendations made. These include the revision of the Ethics committee which now has a balance of staff and students and no members of senior management which provides greater objectivity and reduces bias. Work in ethics also includes the development of policy and procedure. Progress has also been made to include an ethics course in the BA Faculty of Law. YHU has also developed job descriptions. The Panel was presented with job descriptions for a wide range of staff, but not for academic staff. The job descriptions viewed were detailed in terms of function, rights and obligations. Some descriptions included accountability, others did not. Some, but not all, provided details of knowledge, skills and competencies. This presents good progress: however, there is still some way to go to present the job descriptions more consistently so that all of them include accountability, skills,

knowledge and competencies. Surprisingly the descriptions for the most senior posts did not include the need for skills and experience of strategy development and strategic thinking.

The Report includes details of developments in YHU resources. The investments in developing the estate, including specialist facilities, are impressive. The development in the rating system for staff to ensure greater transparency and to align with remuneration scale is good.

There is also progress in the revision of the EQA manual which includes guidance on learning outcomes. It is not clear to the Panel what processes support the review of study programmes, what reports are written as a result of the reviews, where these are reported. Nor is it clear how and by whom any follow up required is monitored.

There is a new policy on learning outcomes and a procedure for revising them. The link between the learning outcomes and the National Qualifications Framework (NQF) is shown in the documents presented for the Management master's programme, for example. The learning outcomes presented demonstrate, on the whole, improvements in the appropriateness of the learning outcome to the study programme's level. However, although the Report identifies *"Clarify the interrelatedness of assessment criteria and some LOs of the given study program or the course."* there was no evidence to indicate that YHU has understood and taken forward the need to align assessment grades, assessment criteria and the achievement of the learning outcomes.

The Report includes *"Assurance of common and in-depth understanding of student-centred learning and teaching"* as an objective and the *"Organization of seminars on student-centred approach for teachers and students"* as the action. Outcomes are reported in terms of training and special events held with a time frame of October-December 2020. It is not clear how progress in embedding a shared understanding and application of this approach will be evaluated, particularly given the emphasis in the documentation on the transmission of information about the approach rather than achieving an understanding which is manifested in practice.

It is commendable that YHU has sought to address all the recommendations presented in the assessment report from EKKA. At the same time, this results in a lack of focus and a failure to prioritize. The Panel saw no evidence, to suggest that YHU had sought to identify the criticality of different recommendations to overall progress. Nor was it clear to the Panel in the documentation presented, where decisions and responsibility for addressing recommendations lay nor what the reporting and monitoring processes were.