

Rejection of the Application
by NEAQA - National Entity for Accreditation and Quality Assurance in
Higher Education
for Renewal on the Register

Register Committee
 5/6 December 2018

Ref. RC22/A56

Ver. 1.0

Date 2018-12-18

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Application of:	23/03/2017
Agency registered since:	29/11/2014
External review report of:	22/02/2018
Review coordinated by:	ENQA - European Association for Quality Assurance of Higher Education
Review panel members:	Achim Hopbach, (chair), Danutė Rasimavičienė (academic), Ewa Kolanowska (Secretary), Marija Vasilevska (student)
Decision of:	06/12/2018
Registration until:	31/12/2017
Absented themselves from decision-making:	Nobody
Attachments:	<ul style="list-style-type: none"> 1. Confirmation of eligibility, 06/04/2017 2. External Review Report, 22/02/2018 3. Additional representation, 14/09/2018

1. The application of 23/03/2017 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 06/04/2017.
3. The Register Committee considered the external review report of 22/02/2018 on the compliance of CAQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee noted that in October 2017 a new law on higher education was enacted, establishing the National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA) to replace the Commission for Accreditation and Quality Assurance (CAQA).
5. The Register Committee noted that in 2018 NEAQA incorporated CAQA, and inherited its regulations, procedures and standards.
6. On 18/06/2017 the Register Committee invited CAQA to make additional representation on the grounds for possible rejection. Considering the

changes resulting from the new law, CAQA was further asked to provide information on the changes in its organisational identity, organisational structures and to its external quality assurance activities, and to clarify whether or not the new NEAQA is to be regarded as its successor.

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7. The Register Committee considered NEAQA's additional representation of 14/09/2018 and clarification regarding CAQA's integration into NEAQA.
8. As the legal entity of CAQA has been dissolved and succeeded by NEAQA, the decision hereafter solely refers to the agency as NEAQA.

Analysis:

9. In considering NEAQA's compliance with the ESG, the Register Committee took into account:
 - *accreditation of higher education institutions;*
 - *accreditations of study programmes (including initial and periodic accreditation);*
 - *external quality control of higher education institutions (audit).*
10. The Register Committee found that the report and additional representation provides sufficient evidence and analysis on NEAQA and its predecessor level of compliance with the ESG.
11. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.2 – Designing methodologies fit for purpose

12. In its analysis the panel considered that the agency's focus on compliance with minimum requirements should be balanced by a stronger emphasis on quality improvement, in particular in what regards the agency's audit procedures.
13. The Register Committee shared the view that NEAQA's standards would benefit from a revision to ensure full clarity, consistency and readability, in particular in what concerns the employment of site-visits in programme accreditation procedures.
14. The Register Committee concurred with the panel's analysis as regards the arrangement whereby NEAQA's members combine their decision-making function with that of external experts and with the recommendation to separate these functions.
15. In its additional representation the agency stated that the inherited regulations, procedures and standards of CAQA were revised considering the panel's concerns and the new by-laws. According to NEAQA particular attention was devoted to ensuring the broader inclusion of external reviewers and the separation of review experts from other member and staff positions in the organisation.

16. While the Register Committee acknowledged the formal changes implemented by the agency to address the panel's concerns, the Committee underlined that these changes would have to be reviewed by an external panel to determine their fitness for purpose and the clarity, consistency and readability of NEAQA's methodologies.
17. The Register Committee therefore concluded that NEAQA complies only partially with standard 2.2.

ESG 2.3 – Implementing processes

18. In its decision of inclusion (of 29 November 2014), the Register Committee flagged for attention CAQA's consistent implementation of a follow-up procedure.
19. The review panel's analysis showed that the agency has made improvements, having also introduced follow-up procedure for its audits. The Register Committee found that while the panel was satisfied with this improvement, the approach to follow-up should allow higher education institutions to also report progress in the implementation of recommendations before all external review procedures.
20. The Register Committee further noted that site-visits are not consistently carried out by NEAQA for programme accreditation.
21. In its additional representation NEAQA stated that it plans to develop procedures for follow-up to support higher education institution in reporting progress in the implementation of recommendations before all external reviews. The agency also mentioned that to the extent its financial situation will allow, that site-visits would be part of its regular accreditation of study programmes.
22. While the Register Committee acknowledged the intentions of the agency to address its shortcomings with the standard, the Committee noted that the agency has neither formalised nor implemented its new practice yet. The Register Committee therefore concluded that, as it stands, NEAQA complies only partially with standard 2.3.

ESG 2.4 – Peer-review experts

23. Following the last external review of the agency, the Register Committee flagged for attention the involvement of students as members of the expert groups for accreditation of programmes. The panel's findings show that students (and employer representatives) take part in periodic programme accreditations only when they are combined with institutional ones. The panel also noted that the involvement of students is limited to student matters.
24. The Register Committee therefore concluded that the flag was not addressed and underlined the recommendation of the panel to ensure the involvement of students in all periodic programme accreditation reviews and to allow for students to contribute beyond the strictly student-related matters.

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25. The Committee further noted that at the time of the application by CAQA review team experts remained anonymous and that their involvement was limited to assessing compliance based on documentation. The site visits were undertaken by a CAQA sub-commission, which subsequently prepared the final report integrating the experts' feedback.
26. The Register Committee considered that this arrangement did not meet the requirement of the standard and that assessments should be undertaken by a "group of external experts". The Committee emphasised the recommendation of the panel to ensure the involvement of external experts with a central role in the external QA processes.
27. In its additional representation the panel stated that it has taken steps to set apart its commission experts from its external review experts, clarifying their status and responsibilities; it has defined the composition of review expert team to include academic experts, a student, representatives of employers and field experts. The agency further specified that experts will no longer be anonymous and that the appointment of experts will be published on its website.
28. The Register Committee welcomed the intended changes, but noted that the new practices could not be verified by the Committee and were yet to be externally reviewed by a panel.
29. The Register Committee thus concurred with the conclusion of the panel that NEAQA complies partially with ESG 2.4.

ESG 2.6 – Reporting

30. The panel noted that CAQA does not publish initial accreditation reports of higher education institutions and their programmes since another accreditation review in these cases is carried out after one year. While the panel considered this approach to some extent justifiable, the Register Committee underlined that, according to the standard, reports by the experts should be published in full. This applies to all types of reports, whether part of an initial or follow-up process.
31. The review panel also found that the current reporting arrangements limit substantially the input coming from academic experts, students and labour market representative. The findings of the panel also showed that NEAQA's reports are not sent to the institutions concerned for a factual check before the final version is published.
32. In its additional representation the agency stated that l NEAQA plans to publish all accreditation reports and decisions on its new website..
33. The Register Committee welcomed the agency's intention to provide full open access to all reports, but could not verify their publication on the agency's website as yet. The Committee therefore concurred with the conclusion of the panel that NEAQA complies only partially with ESG 2.6.

ESG 2.7 – Complaints and appeals

34. The Register Committee noted that in the case of refusal of accreditation, the higher education institution concerned may lodge an appeal to the NCHE who is the responsible body for deciding on the appeals on the agency's decisions. The Register Committee further noted that NEAQA does not have in place any procedures for complaints.
35. While the review panel found that representatives of the evaluated higher education were fully familiar with the appeals arrangements, the panel recommended that appeals should be nevertheless considered by a separate body within the structure of an agency. The panel further recommended the establishment of a complaints procedure.
36. The Register Committee welcomed NEAQA's announcement that it will issue Rules of Appeals. The intended changes however were still in development and not yet implemented and externally reviewed by a panel.
37. The Register Committee therefore concurred with the conclusion of the panel that NEAQA complies only partially with ESG 2.7.

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ESG 3.1 – Activities, policy and processes for quality assurance

38. The Register Committee noted that while NEAQA's strategy could provide a comprehensive framework for the agency's daily operations, the agency does not have in place mechanisms for effective forward planning and reviewing progress towards its objectives.
39. Considering the involvement of stakeholders, the panel's findings show that, since its last review, NEAQA has improved the engagement with employer representatives in its quality assurance activities. However, stakeholder involvement is still limited in agency's work given that neither students nor employers are involved in NEAQA's governance.
40. The Register Committee underlined the panel's recommendation of ensuring the involvement of students and employers in NEAQA's governance and for the need to set in place mechanisms to implement NEAQA's mission and strategy.
41. In its additional representation the agency stated that it has now taken steps to involve students and employers in its Steering Committee meetings. The Register Committee nevertheless noted that the five members of the Steering Board are all full university professors and that the involvement of students is limited to topics related to student issues.
42. NEAQA added that it has put in place mechanisms to translate the agency's mission and strategic plan, and that the agency now reports yearly on its financial plan and every half a year on its review results to the Government.
43. The Committee acknowledged the steps taken by NEAQA to address its compliance with the standard, but underlined that the involvement of

stakeholders should not be limited to consultations where specific topics are addressed, i.e. involvement of students only when student issues are discussed, but that the agency is expected to foster full and meaningful engagement of all relevant actors in its governance and work.

44. The Committee further underlined that changes still have to be enacted and that progress in involving stakeholders has not been significant. The Committee therefore concluded that as it stands NEAQA is only partially compliant with standard 3.1.

ESG 3.3 – Independence

45. The Register Committee had flagged the independence of NEAQA's predecessor and the relationship between the agency and NCHE, in particular with regard to NCHE's double role of appointing members and being involved in the development of procedures and criteria as well as serving as the appeals body.
46. The review panel found that the double role of NCHE was not very transparent. However, in the panel's view these arrangements did not interfere with the agency decision-making. The panel had also noted that CAQA was expected to become fully independent in terms of organisational and financial arrangements when incorporated into the new QA body, NEAQA, pursuant to the changed Law on Higher Education (LoHE) (review report, p. 19).
47. In its additional representation NEAQA stated that the recent amendments to the Law on Higher Education provided the agency with the possibility to initiate procedures for an additional quality control, independently of the Ministry and that the new regulations on accreditation will enable full independence in the selection of expert teams. The agency further clarified that the standards and procedures for accreditation and quality assurance are first proposed by the agency and then adopted by NCHE.
48. Considering its organisational independence the agency added that its Steering Committee appoints the Director of the agency, who is selected following a call for competition.
49. The Register Committee welcomed the changes and noted that compared to its predecessor, NEAQA has strengthened its independence from NCHE and Ministry. The Committee nevertheless considered that the new organisational and financial arrangements still have to be fully implemented, and would need to be verified by an external panel.
50. The Register Committee therefore concluded that, as it stands, NEAQA is only partially compliant with standard 3.3.

ESG 3.5 – Resources

51. In its decision of inclusion the Register Committee flagged for attention the sustainability of CAQA's resources to ensure its effective operation.

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52. The panel noted as positive developments since the previous review of CAQA the recruitment of a staff member assisting in the preparation of reports and the full integration of staff in agency's activities. The panel, however, added that NEAQA's predecessor lacked human resources for other tasks which would enhance the agency's performance.
53. Considering the financial management of the agency, i.e. a bank account managed by the Ministry, the panel found that the planning, management and operational efficiency of the agency were limited due to its dependence on the Ministry's administrative and financial services.
54. The agency stated in its additional representation that it now has its own accounts and, while it continues to receive financial support from the Republic of Serbia for its initial activities, the agency's further actions will be financed exclusively from its own funds (Article 14 of the Law on Higher Education).
55. Considering the changes enacted by the agency the Register Committee was thus able to concur with the panel's conclusion of compliance and considered that NEAQA complies with ESG 3.5.

ESG 3.6 – Internal quality assurance and professional conduct

56. The Register Committee noted that while CAQA/NEAQA has a number of mechanisms to ensure internal quality (Quality Policy, Standards of Work and Code of Ethics, occasional surveys with stakeholders) that the agency lacks formal mechanisms to act upon the external and internal feedback on a regular basis and thus foster continuous improvement.
57. In its additional representation NEAQA stated its plans to improve communication among all stakeholders in quality assurance processes; to introduce software to support its information management processes and ensure transparency in the work of the agency.
58. The Register Committee welcomed the agency's intentions but underlined that plans remained to be enacted and their effectiveness to be reviewed by an external panel. The Register Committee therefore concurred with the panel's conclusion that NEAQA only partially complies with the standard.
59. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

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

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

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61. Also after duly considering NEAQA's additional representation, the Register Committee concluded that NEAQA achieved only partial compliance with a number of standards. The Committee noted that the new legal arrangements seem to support NEAQA in aligning its external quality assurance processes with the ESG. The review report and NEAQA's representation seem to indicate that the agency will be able to resolve many of the panel and Committee's concerns within the foreseeable future. However, as it stands, NEAQA fails to meet some key requirements of the ESG. In its holistic judgement, the Register Committee remained unable to conclude that NEAQA complies substantially with the ESG as a whole.
62. **The Register Committee therefore rejected the application.**
63. **NEAQA has the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review.**
64. **NEAQA has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.**

Commission for Accreditation and Quality Assurance (CAQA)

Ćemal Dolićanin, President

Mihajlo Pupin Boulevard No. 2

11070 BELGRADE

SERBIA

Brussels, 6 April 2017

Confirmation of Eligibility: Application for Renewal of Inclusion on the Register

Application no. A56 of 23/03/2017

Dear Ćemal,

We hereby confirm that the application by CAQA for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of CAQA are within the scope of the ESG:

- *Accreditation of study programs;*
- *Accreditation of institutions;*
- *Initial accreditation;*
- *Audit.*

Please ensure that CAQA's self-evaluation report covers all the aforementioned activities.

We further remind you that the following issues were flagged when CAQA was admitted to the Register and should be addressed in your self-evaluation report and the external review report:

ESG 2.3: Implementing processes [ESG 2005: standard 2.6]

It should be addressed whether the follow-up procedures were implemented consistently.

ESG 2.4: Peer-review experts [ESG 2005: standard 3.7]

It should be addressed whether CAQA has involved students as members of the expert groups for accreditation of new programmes.

ESG 3.3: Independence [ESG 2005: standard 3.6]

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It should receive careful attention how the relationship between CAQA and NCHE influences its independence, especially with regard to NCHE's double role of being involved in the development of procedures and criteria as well as serving as appeals instance.

ESG 3.5: Resources [ESG 2005: standard 3.4]

It should receive attention whether CAQA's resources have been sustainable to ensure its effective operation.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is ENQA's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ENQA has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,



Colin Tück
(Director)

Cc: ENQA

**The additional representation of compliance
National Entity for Accreditation and Quality Assurance [NEAQA]
with the Standards and Guidelines for Quality Assurance
in the European Higher Education Area [ESG]
for the Application of NEAQA,
as successor of Commission for Accreditation and Quality Assurance
[CAQA] for Renewal of Inclusion on the Register**

Application no. A56 of 23/03/2017

Dear Sirs,

Here is an overview regarding EQAR request to present our progress in compliance with ESG.

ESG 2.2 – Designing methodologies fit for purpose

Working plan of the National Entity for Accreditation and Quality Assurance in Higher Education (hereinafter: NEAQA) is focused on promotion of high education in Serbia through ensuring its compliance with the internationally recognized accreditation and quality assurance standards. We find necessary to raise the level of training of reviewers and members of the Commission for accreditation and quality assurance in higher education (hereinafter: CAQA), so that a set of workshops are going to be organized with that goal. Also, our strategy is to foster and provide their independence, professional and ethical behaviour in the process of accreditation and quality assurance. In such a way, NEAQA pretends to the role of the motivator in quality culture building within higher education in Serbia.

NEAQA will perform planned activities in the process of accreditation and quality assurance in accordance with the quality principles in the European Higher Education Area (EHEA), the European Standards and Guidelines (ESG) and the regulations in the Republic of Serbia. Our goal is to improve the quality of higher education in Serbia and to ensure maintenance of its position as a full member of ENQA and EQAR. The basic value that NEAQA will promote will be independence in decision making processes in accordance with

realized quality. NEAQA will carry on its activities autonomously, in accordance with the law, respecting the interests of the higher education institutions, students, employers and the society as a whole.

NEAQA will carry out planned activities with the aim to meet all demands and preconditions to harmonize the system of higher education of Serbia with the European Higher Education Area, respecting the diversity, innovation and specificity of the national higher education system. In that context external review of NEAQA work quality will be implemented in accordance with the Guidelines for external reviews of quality assurance agencies in the European higher education area.

NEAQA is planning to improve continuously efficiency of higher education quality assessment system in Serbia. The commitment to quality refers to the members of CAQA and reviewers who perform the quality assessment of HE institutions and study programs as well as to the employees providing administrative, technical and IT support to NEAQA activities. Independent external experts will be engaged to overview reviewers and sub-commissions for each scientific field, in order to ensure consistent application of the standards in the process of accreditation and quality assurance.

NEAQA will devote special attention to ensuring the quality of human resources necessary for efficient performance of activities. The employment of professional staff, recognized in theory and practice, according to the planned organizational structure, became already operational at the very beginning since NEAQA operates as a brand new institution in the Serbian legal and institutional framework. Worth mentioning is also that NEAQA was formed quite recently: NEAQA Steering Committee was constituted in May 2018, call for competition for the position of the Director and members of CAQA was opened in June 2018, the Director and members of CAQA were elected in July 2018, and CAQA had its first constitutional session in August 2018.

As soon as it was formed, NEAQA has sent to media a clear message that it will work impartially and independently, that it will foster a new culture of quality in HE in Serbia, and that accreditation will be available only to those institutions that fully meet standards and pass an external quality assurance. The new Law on Higher Education of 2017 enabled continuous checking of quality assurance in higher education, out of the regular four years cycle. Through the current Amendments to the Law on Higher Education NEAQA will provide the possibility to initiate the procedure for an additional quality control, independently of the Ministry of Education, Science and Technology Development (hereinafter: Ministry) and the National Council for Higher Education (hereinafter: NCHE).

As a legal successor NEAQA has inherited from the previous CAQA the regulations, procedures, standards, based on the previous Law on Higher Education. In some respect they have limited the fulfilment of ESG which consequently led to the non-compliance with ESG 2.4 and to the partial fulfilment of some ESG standards considered.

A few days ago new bylaws considering rules on standards and procedure for accreditation of study programs, higher education institutions and initial accreditation of higher education institutions have been amended in accordance with the new Law on Higher Education, but also with the requirements of ENQA and EQAR. Particular attention is devoted to changing the procedure of external quality assurance and broader inclusion of external reviewers.

The new rules on accreditation of study programs, initial accreditation of higher education institutions, and accreditation of higher education institutions for which accreditation and quality assurance are performed, will enable full independence of evaluation expert teams. The new bylaws provide for that positions in the reviewing teams are incompatible with the membership in CAQA, as they are completely separate in the new rules.

ESG 2.3 – Implementing processes

As mentioned, the new CAQA was constituted on August 30, 2018. Having in mind these circumstances in this very short time, using experience and recommendations presented in EQAR and ENQA report and letters respectively, we succeeded to prepare three bylaws and standards considering accreditation process. In these bylaws we have incorporated some of recommendations. Especially, CAQA will organize site-visits in the frame of study programme accreditation as much as possible in compliance with financial sustainability of NEAQA tending to perform site-visits as a regular practice in accordance with the new NEAQA development plan and budget.

We are going to enable higher education institution to report a progress in the implementation of recommendations before all external review procedures. To achieve this goal NEAQA will establish the corresponding procedures in preparation of self-evaluation reports. Moreover, NEAQA plans to organize regular seminars and various types of meetings with representatives of higher education institutions, academic expert, students and employer representatives to educate them to be well prepared for these all type accreditation and quality assurance processes.

ESG 2.4 – Peer – review experts

The approach to evaluation in all accreditation processes and external quality assurance is completely changed. First of all expert team will be transparent, and every team will be enlarged. Access to reviewers has been completely changed. The expert team will now be consisted of three academic experts, a student and a representative of employers and experts from practice.

A student and an employer representative participate on equal basis and have the same rights in external review. All members of the Review commission are supposed to sign the report.

The rules have defined a completely changed approach regarding the status of reviewers. Reviewers are no longer anonymous, and their appointment by CAQA is going to be visible at NEAQA website. The Review commission is going to pay a mandatory site-visit during external quality assurance. After conducting a direct review, the Review commission for accreditation of the study program compiles the Report, which contains an assessment of the quality of the study program and of the higher education institution, and forwards it to NEAQA. NEAQA submits the review report to the higher education institution, which may send any comments on the report within 15 days from the date of delivery of the report.

After the expiration of this deadline, the Review commission for accreditation of the study program prepares the Final report, which contains an assessment of the quality of the analyzed study program and of the higher education institution.

After receiving the proposal of the Decision on Accreditation, CAQA shall consider the submitted proposal. If necessary it shall seek supplementary explanations from the Review commission, after which it makes a decision on accreditation (articles 10 and 11 of the Rules on standards and procedure for accreditation of study programs).

Site-visits allow reviewers to play a key role and to be the most important segment of the accreditation and quality assurance process. Their Final report represents a key element for making a final decision on accreditation and external quality assurance.

New status and responsibilities of reviewers provide a new position of external experts, thus achieving the independence of the work of the Review commissions well as its key role in the accreditation process and external quality assurance. Additionally, reviewers from abroad will also be included in Review commissions.

ESG 2.6 – Reporting

The new principle of NEAQA's work is full transparency and publicity in the work. Review reports compiled on any basis in the process of accreditation and external quality assurance of higher education institutions and at any time will be published on NEAQA website and thus available to all interested parties. Accordingly, all reports and decisions related to the initial accreditation of the higher education institution, accreditation of study programs after one year and their annual monitoring or quality checks during their first implementation, will be published on the website and will be made available to the public.

By the new Statute of NEAQA all reports and decisions regarding accreditation and external quality assurance processes will have open access and full visibility. For these purposes a program for the new site of NEAQA is already in preparation.

The role of academic experts, of a student and an employer representative in the evaluation procedures is improved and defined in details in bylaws.

ESG 2.7 – Complaints and appeals

By the new regulations NEAQA is supposed to issue the Rules of Appeals defining complete procedure.

ESG 3.1 – Activities, policy and process for quality assurance

Out of seven members, two members of NEAQA Steering Committee are representatives of employers and professional associations. Students also participate in NEAQA Steering Committee when it comes to student issues, and they are necessarily included in the review team that is formed for each request for accreditation and quality control separately. NEAQA mission and strategy have been defined and the mechanisms for their realization were set up by the Statute, the rules of procedure and the procedures.

There are two levels in decision making: the first one within expert team for evaluation (consisted of three academic experts, one student and one employer representatives), while the second one is on the level of CAQA. Academic experts may involve international scholars who applied to be reviewers. On September 10, 2018 NCHE is ending the procedure of application for the new cohort of evaluation experts. This call included also experts from abroad. Therefore we expect to have more serious approach in accreditation processes as well as in quality assurance procedures. Before the second level decision the corresponding institution is entitled to compliant procedure which is available in accreditation or external quality assurance process.

The Director of NEAQA has to represent annual plan including finance part to the Executive Board and later on to the Government. Every half of year the Steering Committee considers acquired results of NEAQA including CAQA's ones and informs the Government about them.

Employers have two representatives in the Steering Committee. Student representatives take part during the Steering Committee meetings whenever topics relevant for students are discussed.

ESG 3.3 – Independence

In accordance with the new Law on Higher Education, as an independent legal entity NEAQA has managed to ensure a high level of independence in relation to NCHE, since members of the Review commissions are chosen by CAQA which ensures independence in their work. The Director of NEAQA as well as members of CAQA are elected by the new NEAQA Steering Committee, so that the influence of the NCHE in that proceeding has been minimized.

NEAQA's independence is also based on funding from its own sources, which has not been the case so far.

Also, in the adoption of standards and procedures for accreditation and quality assurance, although the NCHE brings them, NEAQA has the key role in proposing them. Experience has shown up to now that the National Council generally adopts proposals of NEAQA without or with minor changes.

As for the appeal procedure, the NCHE almost cannot change the decision of NEAQA in the appeal procedure provided that there were no errors in the implementation of the Law on Higher Education, the rules on standards and procedure for accreditation of study programs and external quality assurance of higher education institutions. In other words, NCHE is responsible only for examining the formal correctness of the conducted procedure in NEAQA, and not for meritorious examination of facts and making a different decision.

ESG 3.5 – Resources

The government of the Republic of Serbia provided funds only for NEAQA initial activities, and further NEAQA actions are going to be financed exclusively from its own funds (Article 14 of the Law on Higher Education). In this way a high level of independence of NEAQA from the state influence is achieved. NEAQA has its own account with its own funding. NEAQA plans to strengthen its financial independence through various project activities, educational workshops, etc.

The new organizational scheme is adopted and NEAQA, as a legal successor to the former CAQA, is significantly strengthened in terms of personnel by the engagement of top-level, competent, proven experts, and there are plans to continue to strengthen the human resources in the future depending on available financial capabilities.

The organization of the staff has been significantly improved in the past few months since NEAQA was constituted. Despite problems with the dysfunctional database, complete documentations arranged by electronic spreadsheets containing all relevant information concerning individual requirements for accreditation and quality assurance from the moment of submission of documents to the stage where there are at the moment. Performance of NEAQA as the successor to CAQA has been significantly upgraded by hiring a

few top experts. Finally, members of the Steering Committee are distinguished professors and the most successful practitioners, known to the general public as people of integrity. Also, the Director and the President of the Accreditation Commission are renowned and respected professors at home and abroad, with extensive experience in accreditation and management work. Worth noticing is that those bodies did not exist before, as the previous CAQA was not an independent legal entity. With such personnel, NEAQA is expected to successfully conduct accreditation and quality assurance tasks. All conditions have been created for NEAQA to fully meet the standard 2.4 which CAQA did not fulfil, as well as other standards that CAQA partially fulfilled.

ESG 3.6 – Internal quality assurance and professional conduct

Already in October 2018 NEAQA is planning to organize meetings with higher education institutions representatives to discuss recommendations how to improve communication among all stakeholders in quality assurance process. Those meetings are going to be organized on a regular base in the future. We also expect an improvement of internal quality assurance due to new organization of this body as an agency with separate roles of the Director of NEAQA and CAQA, including its President.

New software, which is in the process of developing right now, will allow the complete digitization of NEAQA work. Along with that all procedures and supporting NEAQA documents that apply in the accreditation and quality assurance procedure are clearly defined and visible. This will enable efficient organization, implementation and control of accreditation and quality assurance activities in higher education. At the same time it ensures full transparency of NEAQA work, given that all relevant materials and documents in the current and completed procedures for accreditation and quality assurance will be publicly available on NEAQA website. Expanded visibility of all activities of NEAQA is a part of the new internal quality assurance policy.

Using various questionnaires preparing for various stakeholders and application of descriptive statistics methods in their analysis which are in preparation, NEAQA expects progress in professional conduct of all participants in the processes of accreditation and quality assurance.