

Approval of the Application by Agency for the Quality of the Basque University System (Unibasq) for Renewal of Inclusion on the Register

Register
Committee
4-5 November 2019

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Ver . 1.0
Date 2019-11-05
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Application of:	05/01/2018
Agency registered since:	29/11/2014
External review report of:	21/02/2019
Review coordinated by:	ENQA - European Association for Quality Assurance of Higher Education
Review panel members:	Teresa Sanchez (Chair), Pieter-Jan Van de Welde, Simona Lache (academic), Dale Whelehan (student)
Decision of:	19/06/2019
Registration until:	30/04/2019
Absented themselves from decision-making:	None
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 07/02/2018 2. External Review Report, 21/02/2019 3. Applicant's statement on the report, 14/01/2019 4. Request to Unibasq, 15/04/2019 5. Clarification by Unibasq, 20/05/2019 6. Letter answering to the deferral decision, 12/09/2019

1. The application of 05/01/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 07/02/2018.
3. The Register Committee considered the external review report of 21/02/2019 on the compliance of Unibasq with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered Unibasq's comments on the external review panel report of 14/01/2019.

5. The Register Committee sought and received clarification from Unibasq (request of 15/04/2019 and response of 20/05/2019).
6. The Register Committee deferred the consideration of Unibasq's application for renewal of registration pending additional representation by Unibasq on the reasons grounds for possible rejection, set out in the decision of 19/06/2019.
7. The Register Committee considered Unibasq's additional representation of 12/09/2019.

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Analysis:

8. In considering Unibasq's compliance with the ESG, the Register Committee took into account the following activities:
 - *Programme ex-ante accreditation and authorisation*
 - *Follow up of the study programmes of the Basque University System*
 - *Review of the study programmes modifications*
 - *Accreditation renewal of study programmes*
 - *Audits (IQAS audits)*
 - *Docentia*
9. Evaluation and accreditation of teaching and research staff, Evaluation of individual research merits of academic staff as well as Unibasq's contribution to the evaluation of "títulos propios" are not within the scope of the ESG and, thus, not pertinent to registration on EQAR.
10. The Register Committee found that the report provides sufficient evidence and analysis on Unibasq's level of compliance with the ESG.
11. The Register Committee took into account the fact that previously flagged issues were addressed in the self-evaluation report.
12. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.3 – Implementing processes

The external review panel noted that for (voluntary) international accreditation procedures "the full responsibility to request any kind of follow-up lies in the hands of the institution".

The Register Committee considered the clarification by Unibasq that it follows up programmes' improvement plans in its international quality assurance activities, which is mentioned in the relevant protocol.

Having considered Unibasq's clarification, the Register Committee was able to concur with the panel's conclusion of compliance.

The Register Committee, however, encouraged Unibasq to look into possibilities to strengthen its follow-up procedure for (voluntary) international reviews, and to clarify the expectation towards HEIs regarding the follow-up.

ESG 2.4 – Peer-review experts

In the previous review this standard was flagged due to the fact that the regular involvement of students on all review committees was yet to become practice.

The Committee noted that steps have been taken in order to ensure regular involvement of students. Participation of students in evaluation procedures is guaranteed by the Basque Country Act 13/2012.

The Register Committee therefore concluded that the flag has been addressed and concurred with the panel's conclusion that Unibasq (substantially) complies with the standard.

ESG 2.6 – Reporting

In the last review of the agency the Register Committee flagged for attention the publication of reports for evaluation of study programmes and monitoring reports of study programmes, which then were only communicated to the interested party.

The review panel found that Unibasq published all reports, except for the ex-ante accreditation reports on programmes that have not been successful.

In its additional representation Unibasq confirmed that it does not publish reports for the from ex-ante accreditation, arguing that it would be confusing for readers to find information on a study programme that will never exist. Unibasq did not express any intention to change this practice in future.

The Register Committee underlined that all reports should be published as required by the standard. The Committee underlined that even if a study programme will not be offered it can be of interest for the public to know which concepts were denied accreditation and why. In particular, such information is important if the same programme applies for accreditation by another agency, which needs to be able to find out that it was earlier denied accreditation by another agency.

As the flag was largely, but not fully, addressed the Register Committee did not concur with the review panel's conclusion of compliance, but concluded that Unibasq still complies only partially with ESG 2.6.

ESG 2.7 – Complaints and appeals

In order to improve the appeals procedure, the former Ethics Committee became the Ethics and Guarantees Committee, which was composed of

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members who play an active role within the agency. The review panel noted that the composition of the Committee was limiting its independence.

The Register Committee underlined the recommendation of the panel that the Ethics and Guarantees Committee be composed of members who are independent from the agency and the Basque higher education system.

In its additional representation, Unibasq stated that the composition of the Committee had been changed. The new Ethics and Guarantees Code, which was approved by Unibasq's Governing Council, established that the Committee is now composed of experts from outside the Basque University System, who moreover cannot be part of any other Unibasq body or committee. The Register Committee was able to see the new composition on Unibasq's website.

Furthermore, while the panel confirmed that Unibasq has developed a clear appeals processes, it referred to "a more general procedure for the reception and handling of complaints and suggestion", but did not analyse that in detail.

In its additional representation, Unibasq did not comment further on the complaints procedure.

Given the unclear process for handling complaints, the Register Committee remained unable to concur with the review panel's conclusion of compliance, but concluded that Unibasq complies only partially with ESG 2.7.

ESG 3.1 – Activities, policy and processes for quality assurance

The Register Committee sought and received clarification regarding the evaluation of "títulos propios". Unibasq clarified that these activities were not listed in its application for renewal of registration because Unibasq "realized that it was more a consultancy activity as Unibasq just provides an external expert report" and thus did not consider them as activities within the scope of ESG.

In support of its classification, Unibasq stated that it acted only as a subcontractor to the UPV/EHU and had no own responsibility for the review process or the outcomes. The Register Committee also noted that Unibasq does not provide "accreditation" of 'títulos propios', contrary to what was published by UPV/EHU. Unibasq, however, stated on its website that it "will evaluate and certificate" those degrees.

Unibasq further noted that the misunderstandings were caused by a discrepancy between the internal regulations of the UPV/EHU and the public information on their website, stating that some programmes are accredited by Unibasq.

Having considered Unibasq's response, the Register Committee accepted that the evaluation of "títulos propios" may be classified as consultancy service performed by Unibasq to UPV/EHU.

The Register Committee further considered how Unibasq ensured a clear distinction from its external quality assurance activities within the scope of the ESG (see EQAR Policy on the Use and Interpretation of the ESG, standard 3.1 and Annex 5). The Committee noted that such a clear distinction was particularly crucial in this case, given that the terminology and the characteristic of the activity caused an actual risk of confusion with ESG activities.

The Register Committee concluded that the presentation on Unibasq's website was misleading and did not ensure clarity as to the different nature of these evaluations; it thus considered that Unibasq did not comply with the standard.

In its additional representation, Unibasq stated that it held specific meetings with the UPV/EHU, sent a formal letter regarding this issue and elaborated a new agreement with the UPV/EHU, which was approved by Unibasq's Governing Council. As stated in the agreement, the evaluations of "Títulos propios" are consultancy activities which cannot be represented as "Accredited, validated or reviewed by Unibasq".

In addition, Unibasq removed from its website the information that could have been misleading about "títulos propios" previously. The Committee, however, noted that UPV/EHU continues to refer to an "external report" by Unibasq in its advertisement of "títulos propios".

The Register Committee welcomed Unibasq's steps that were taken to clarify the status of this activity and to avoid further misinterpretations. At the same time, the Register Committee considered that it cannot be fully determined at this stage whether the new communication is fully clear to all stakeholders and avoids any misrepresentation; this should thus be analysed in the next external review of Unibasq.

The Register Committee remained unable to concur with the panel's conclusion of compliance but concluded that Unibasq now complies partially with standard 3.1.

ESG 3.4 – Thematic analysis

In the previous review the panel found that Unibasq had yet to produce a system-wide analysis and there was a lack of sufficient resources which is why this standard was flagged.

The panel recognised that Unibasq has made clear progress in this area in recent years. The reports that agency produces show a clear shift from the evaluation of the procedures to a genuine thematic analysis (see page 24 of the report).

The Committee concluded that the flag has been addressed and concurred with the review panel's conclusion that Unibasq complies with the standard.

ESG 3.5 – Resources

In the last review of the agency the Register Committee expressed concern regarding Unibasq's capacity to ensure adequate resources for the increasing number of its activities.

In the meantime, the agency has received additional funds which have allowed the agency to play a very active role in the international quality assurance community. The panel commended the agency for the achievements and the active role.

The Register Committee considered that the flag was addressed and therefore concurred with the panel's conclusion that Unibasq complies with ESG 3.5.

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

Conclusion:

13. Based on the external review report and the considerations above, the Register Committee concluded that Unibasq 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	Substantial compliance	Compliance
2.3	Full compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Full compliance	Compliance
2.6	Substantial compliance	Partial compliance
2.7	Substantial compliance	Partial compliance
3.1	Substantial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Substantial compliance	Compliance
3.5	Substantial compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

14. The Register Committee considered that Unibasq only achieved partial compliance with some standards. In its holistic judgement, the Register Committee considered that these are specific and limited

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issues, and that Unibasq had made significant progress in those areas. The Committee therefore concluded that Unibasq continues to comply substantially with the ESG as a whole.

15. The Register Committee therefore approved the application for renewed Unibasq's inclusion on the Register. Unibasq's renewed inclusion shall be valid until 29/02/2024.
16. The Register Committee further underlined that Unibasq is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.
17. Unibasq has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <https://www.eqar.eu/register/application-process/>). Any appeal must reach EQAR within 90 days from receipt of this decision.

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Agencia de Calidad del Sistema Universitario Vasco / Euskal Unibertsitate
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Brussels, 7 February 2018

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

Application no. A65 of 05/01/2018

Dear Eva,

We hereby confirm that the application by Unibasq for inclusion on the Register is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by European Association for Quality Assurance of Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

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

- *Programme ex-ante accreditation and authorisation in the Basque University System;*
- *Follow-up of the study programmes of the Basque University System;*
- *Review of the study programmes modifications;*
- *Accreditation renewal of study programmes;*
- *Audits (IQAS audits);*
- *Docentia.*

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

Furthermore, the self-evaluation report and external review report should also address how Unibasq ensures that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG in case the agency is not registered on EQAR.

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EQAR Founding Members:



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

ESG 2.4 – Peer-review experts [ESG 2005: standard 3.4]

It should receive attention whether Unibasq has ensured that students are regularly involved in all review committees.

ESG 2.6 – Reporting [ESG 2005: standard 2.5]

It should be addressed whether Unibasq has moved to publish full evaluation reports for all its ESG-relevant activities.

ESG 2.7 – Complaints and appeals [ESG 2005: standard 3.7]

The new appeals procedure developed by Unibasq should receive attention.

ESG 3.4 & ESG 3.5. – Thematic analysis and Resources [ESG 2005: standard 2.4]

It should be receive attention whether Unibasq has been able to secure sufficient and sustainable resources, from both government funding as well as other sources, amongst others with regard to its ability to carry out system-wide analyses.

We confirm that the following activities are not within the scope of the ESG:

- *Evaluation and accreditation of teaching and research staff.*
- *Evaluation of individual research merits of academic staff.*

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

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 Unibasq'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. Unibasq 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

ENQA AGENCY REVIEW: AGENCY FOR THE QUALITY OF THE BASQUE UNIVERSITY SYSTEM (UNIBASQ)

TERESA SANCHEZ, PIETER-JAN VAN DE WELDE, SIMONA LACHE, DALE WHELEHAN
21 FEBRUARY 2019

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EXECUTIVE SUMMARY

This report analyses the compliance of the Agency for the Quality of the Basque University System (Unibasq) with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) parts 2 and 3. The report is based on an ENQA coordinated peer review. Based on this report Unibasq will apply for the renewal of its membership of ENQA and its registration on the European Register for Quality Assurance Agencies (EQAR). The site visit of the peer review panel in charge of the evaluation of the compliance with the ESG took place between October 29 and 31 2018.

The opinion of the panel is that the agency fully complies with ESG 2.3, 2.5, 3.2, 3.3, 3.6 and 3.7 and substantially complies with ESG 2.1, 2.2, 2.4, 2.6, 2.7, 3.1, 3.4, and 3.5. Unibasq clearly has significant experience in the implementation of quality assurance processes as defined in Part 2 of the ESG and taking into account Part 1.

The agency performs a broad range of quality assurance activities, varying from the level of the individual professor and study programme to the level of university centres (faculties or schools) and complete institutions. For several evaluation schemes, cooperation exists with national and other regional quality assurance bodies. Based on the Terms of Reference for this review, the panel has analysed the ex-ante accreditation and authorisation, follow-up, modification and accreditation renewal of study programmes and the AUDIT and DOCENTIA programmes at faculty, school or institutional level.

Overall, the panel concludes that Unibasq is a dynamic and well-functioning agency which has built a high level of trust and support within the system. All stakeholders recognise Unibasq's contribution to the development of quality assurance processes within the universities in the Basque system. The agency has worked hard to optimize its broad range of procedures and has reduced the level of bureaucracy in the system. The contribution of the current management and the committed staff are widely recognized. Thanks to a close cooperation with the regional Government, the agency has been able to influence the development of new instruments, such as the framework for institutional accreditation and the development of labels for 'Links with companies, institutions and some other organisations', 'Innovative methodologies based training' and 'Internationalisation'. In the latter area the agency has been very active since its ENQA-membership was granted in 2014. Both within the ENQA structures and through an active role in international projects, Unibasq has been able to share best practices of the Basque system and it has gained insights which are valuable for the universities in the Basque higher education system.

Nevertheless, the panel signals also some areas for improvement. Within the whole external quality assurance system, the panel notices a strong focus on the development of procedures and on quantitative indicators. While these elements are crucial in the development of a real quality culture, a better balance could be found between qualitative and quantitative approaches. The panel is convinced that a better balance may help to further reduce the administrative burden of procedures as well as to increase the added value for programmes and institutions. It may also help to increase the self-critical nature of self-evaluation reports, make external reports more interesting for students and society in general, and provide valuable input to make thematic analyses based on those reports. The panel recognises the potential of institutional accreditation and the labels which are currently being developed. In order to make full use of this potential, a conscious choice, and even a paradigm shift, would be needed, both within the approach of Government and the approach of the agency. Procedures will need to focus much more on a strategic thinking approach and results and less on a detailed analysis of inputs and processes. Also the full adaptation of the quality assurance system to

the concept of student-centred learning will require a broad debate within the Basque higher education system, which will be a valuable input in the current context, where the agency is developing new quality assurance procedures and approaches.

Finally, the agency has invested in recent years a lot in the communication to (potential) students and broader society. While the review panel values those efforts, it encourages the agency to stay close to its core mission in its communication policy. In the view of the panel such an approach should mainly focus on providing insight in the quality and diversity of the higher education in the Basque higher education system through thematic analysis, building on the information gained through individual review procedures.

INTRODUCTION

This report analyses the compliance of Unibasq with the 2015 version of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in a period from October 2018 to January 2019.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA and EQAR require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they carry out their work as an agency in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is Unibasq's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2014 REVIEW

The panel found that the agency generally complies with the ESG. The agency fully complied with ESG 2.3, 2.6, 2.7, 3.2, 3.3, 3.5 and 3.6, and 3.8. It substantially complied with ESG 2.1, 2.2, 2.4, 3.1, 3.4, and 3.7. It partially complied with ESG 2.5 and 2.8.

Also some points of attention were mentioned:

- Unibasq should re-evaluate whether the assessment of students could be evaluated more systematically within the different evaluation schemes.
- Unibasq should focus its mandatory evaluation schemes more on the compliance of the internal quality assurance of higher education institutions with Part I of the ESG.
- Unibasq should consider how stakeholders' involvement could be further increased in the development of procedures, next to their representation in the Advisory Board.
- Unibasq should reconsider its procedures in order to introduce the full review model in a broader range of evaluation schemes.
- Unibasq should continue to monitor that the self-evaluation reports are of a self-critical nature.
- Unibasq should initiate a review of the DOCENTIA procedures in order to reduce the administrative burden of this evaluation scheme in cooperation with other Spanish agencies.
- Unibasq should integrate the key findings leading to conclusions more explicitly in its reports.
- Unibasq should consider to broaden the intended readership of its reports.
- Unibasq should use the general findings of its external quality assurance processes more as a basis for system-wide analyses on the Basque University System.
- Unibasq should try to diversify its income in order to become less dependent from the Basque Government funding.
- Unibasq should make its medium term ambitions and the direction it wants to head to more explicit.
- Unibasq should stimulate programmes and institutions more to analyse their strengths and weaknesses in the presented self-evaluation reports.
- Unibasq should reconsider whether site visits could be useful in other steps of the AUDIT and DOCENTIA schemes and in other quality procedures.
- Unibasq should clarify the procedures for comments on the preliminary reports and establish formal appeal procedures.
- Unibasq should receive resources in order to play an active role within ENQA.

REVIEW PROCESS

The 2018 ENQA coordinated review of Unibasq was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference of this review (found in annex 2 of this report). The panel for the external review of Unibasq was appointed by ENQA and composed of the following members:

- Teresa Sánchez-Chaparro (Chair – ENQA nominee), Assistant professor (Engineering management department), Universidad Politécnica de Madrid
- Pieter-Jan van de Velde (Secretary – ENQA nominee), Independent consultant in finance and quality assurance (part-time), Co-director at Trividend (a social impact investment fund)
- Simona Lache (EUA/ENQA nominee), Professor, Ph.D. Supervisor/ Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov. Council member and Executive Board member/ Director of Accreditation Department, Romanian Agency of Quality Assurance in Higher Education (ARACIS)
- Dale Whelehan (ESU nominee), PhD candidate in Medical Education, Trinity College Dublin (The University of Dublin)

Paula Ranne, deputy director of ENQA, acted as review coordinator.

Unibasq produced a self-assessment report which provided a substantial portion of the evidence that the panel used to draw its conclusions. The panel conducted a site visit to validate fully the self-assessment and clarify any points at issue. Finally, the review panel produced this final report based on the self-assessment report, site visit, and its findings. In doing so, it provided an opportunity for Unibasq to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review. Not all documentation was available in English. The two panel members with knowledge of Spanish have analysed the documents which were provided in Spanish and shared the conclusions of their findings with the other panel members. This allowed the panel as a whole to consult all necessary information.

Self-assessment report

The self-assessment report is the result of a process involving different stakeholders. A first draft was prepared by the staff, and it was discussed during several meetings with a working group with the following composition:

- Unibasq's management and international officers;
- Representatives from the agency's Governing Council, Advisory Board and Students' Consultative Committee;
- An EQA expert from the German quality assurance agency AQAS (Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen) with experience in external reviews of Quality Assurance agencies.

Next to the working group, the full staff, the Advisory Board and some stakeholders were invited to give feedback on the draft report before it was presented for approval to the Advisory Board and Governing Council in July 2018.

The self-assessment report was found informative and it served as a valuable source of information to the panel. The electronic links to policies, procedures and guidelines on the website were very useful. Nevertheless, a more self-critical approach might have been useful, as well as a more detailed overview of stakeholders' opinions, complementing the description on how stakeholders are involved in the processes of Agency.

Site visit

The Review panel spent four days in Vitoria-Gasteiz (from October 28th until 31st 2018). During those days, the panel had the opportunity to meet with a wide range of stakeholders in the premises of Unibasq. Based on the site visit template, as suggested by the coordinator, the site visit was designed in close cooperation between the Unibasq staff and the panel. The visit was well planned and organized. The programme included interview sessions with members of the Governing Board, the Vice-minister for education of the regional Government, the director of Unibasq and a number of staff members, representatives of the Agency's Advisory Board and standing Committees, and members of review panels. The panel also met various stakeholders, including representatives of the higher education institutions located in the region, student representatives, and external stakeholders. The schedule of the meetings is available in Annex 1.

The staff of the agency demonstrated high professionalism during the entire review process and provided excellent assistance to the panel regarding all matters. At the end of the site visit, the panel held an internal meeting where it agreed on the preliminary conclusions relating to the level of compliance of Unibasq on each of the standards in part 2 and 3 of the ESG. The secretary of the panel then drafted the report in cooperation with the rest of the panel. The draft report was submitted to Unibasq for factual verification in January 2019 and with reference to ENQA standards Unibasq was given two weeks to provide factual corrections on the report.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Legal framework

The legal framework which regulates the university policy in Spain has its origin in the Spanish Constitution of 1978 and its article 27, which recognises university autonomy.

The Organic Law 6/2001 (LOU) of 21st December 2001, amended by Organic Law 4/2007 (LOMLOU) of 12th April 2007, sets out the basic regulations on a national scale establishing the respective powers and competencies of universities, the national government and the governments of the different Autonomous Regions.

Together with the Statute of Autonomy of the Basque Country (1979), this legislation states that university policy is mainly the responsibility of the Autonomous Regions, which are responsible for the authorisation, modification and termination of official study programmes.

The main rules for the development of higher education in the Basque Country were laid down in the regional Law 3/2004 of 25 February 2004 dealing with the Basque University System. This system is defined as consisting of all universities established in the Basque Country. The Law provides details about the objectives and underlying principles of the system; it also deals with universities' teaching and research activities; it defines the university community as consisting of the student body, teaching and research staff, and administrative and service staff. It refers to the legal status, academic and corporate governance and quality assurance of universities, it regulates certain economic aspects and the system of funding for the public university and it provides for the creation of the Agency for the Quality of the Basque University System.

Institutions

The Basque University System is built on a well-established tradition of education and training. It comprises three multi-campus higher education institutions that all have their main seat in the Basque territory. Each of them features a different kind of ownership:

- Universidad del País Vasco / Euskal Herriko Unibertsitatea (UPV/EHU) is the only public university in the Basque Country; it operates as a single university "system", with three campuses located in each of the three provinces of the Basque Country: Gipuzkoa, Bizkaia and Araba.
- The Universidad de Deusto (Deusto University) is a private, non-profit university of the Society of Jesus (Jesuits). It has two campuses in the Basque Country: in Bilbao and San Sebastian, and a Business School division in Madrid.
- Mondragon Unibertsitatea (Mondragon University) is a private, non-profit university that is organised as a cooperatively owned entity created in 1997 by means of the merger of previously existing education and training institutes.

The general rule is that the duration of Bachelor degrees ("Grados" in Spanish) is 240 ECTS, even though 180 ECTS degrees are allowed in some areas and there are specific degrees such as Medicine with 330 ECTS.

The study programmes offered by the Basque University System cover all academic fields, all levels and all types of programmes. Table 1 offers data about the study programmes offered by each of the 3 universities in the Basque Country, which have already passed the ex-ante accreditation process.

In the 2017-2018 academic year around 58.000 students were enrolled at Basque universities (for details see Table 1); 74% of them were enrolled at the public University of the Basque Country. For mainly demographic reasons, the university system in Spain has experienced a substantial decrease in the number of students enrolled in recent years. This has also happened in the Basque Country, with a drop of around 3,000 students since 2011/2012.

Table 1: Size of the universities in the Basque University System

University	Bachelor Students	Bachelor progr.	Master students	Master progr.	PhD students	PhD progr.	Acad. Staff
UPV/EHU	35,492	68	3,325	109	3,570	65	5,663
University of Deusto	8,643	22	1,498	32	347	7	770
Mondragon University	4,087	15	577	15	140	3	436
Total	48,222	105	5,400	156	4,057	75	6,869

Source: Universities' official data, as presented in the Self-Assessment Report.

Regarding academic staff, the main body of academic staff in Spain are civil servants and full-time professors/researchers. Universities also employ professors/lecturers on a contractual full-time or part time basis. This type of staff needs to be previously evaluated and "accredited" either by the national Quality Assurance Agency (ANECA) or by their regional QA agency. In the Basque Country, the evaluation and accreditation of the different categories of academic and research staff is one of the core assignments of Unibasq.

There were 6869 lecturers and researchers in the Basque university system in the academic year 2017-2018, 82% of them at the public University of the Basque Country, Table 1.

QUALITY ASSURANCE FRAMEWORK

In line with the division of powers in the Spanish legal framework, the functions of evaluation, certification and accreditation are reserved functions of the National Agency for Quality Assurance (ANECA) and the evaluation bodies determined by each Autonomous Community's laws. In Autonomous Communities where such an evaluation body has been established and this body is registered in the European Quality Assurance Register (EQAR), it has the competency to implement the full range of quality assurance activities which are assigned to quality assurance agencies in higher education.

With regard to programme review, the Spanish Government has laid down that degrees and higher education qualifications must follow a system of verification (ex-ante accreditation), modification, monitoring and accreditation.

Unibasq also implements the voluntary evaluation schemes AUDIT (certification of internal quality assurance systems at the level of university centres (faculties or schools)) and DOCENTIA (certification of quality assurance of teaching quality of academic staff at university level).

In 2015, the Spanish Government has added the possibility for university centres (faculties or schools) to obtain institutional accreditation based on the ex-post accreditation of at least half of their official bachelor and master programmes in combination with the accreditation of their internal quality assurance system, according to the AUDIT programme.

UNIBASQ

The Agency was created under the name “Agency of Quality Evaluation and Accreditation of the Basque University System” (under Article 79 of Law 3/2004 on the Basque University System) and was first called “Unigual”. On 4 April 2005 its first Governing Board was set up, which approved the Agency’s statutes on 1 June 2006. In the year 2009 a process of change was started on the initiative of the Agency with a view to adapting its statutes and operations to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Because of this extensive process, the Agency’s Statutes were changed (in January 2011) and the new name of Unibasq was adopted. However, this search for European compatibility made it clear that only a new law could introduce all the necessary changes and guarantee the Agency’s status as an independent, professional entity. Therefore, the Basque Country Act governing Unibasq – the Agency for the Quality of the Basque University System was adopted in 2012 (Law 13/2012 of 28 June 2012). Under the umbrella of this new Law the Agency developed its new Statutes that were approved by the Basque Government in May 2013. Unibasq underwent its first external review coordinated by ENQA in 2014.

Unibasq’s mission is to help improving the Basque University System by promoting quality for the benefit of the various stakeholders involved in higher education. Its purpose is the evaluation, accreditation and certification of quality in the Basque University System, in accordance with Spanish and international standards. It may also carry out evaluation, accreditation and certification activities outside the Basque Autonomous Community based on prior agreements signed with relevant external entities.

GOVERNING STRUCTURE

Unibasq is a public entity governed by private law (which gives it more administrative and financial autonomy) and accountable to the Basque Government department in charge of universities.

The **Governing Board** is responsible for the governance of the agency in strategic and structural terms. The approval of its strategic and annual management plans, the agency’s preliminary budget plan and the programme-contract are its main functions. It must include representatives from the Basque Government, the rectors of the three Basque universities, one student, another person with recognized academic prestige, and six persons appointed by the Basque University Council (three of them working outside the Basque Autonomous Region, one of whom at least must work outside Spain and two must work outside the university community).

The **Advisory Board** is responsible for the development and approval of all evaluation procedures and criteria to be used by the Agency. It is also responsible for the submission of proposals to the Director of the agency for the appointment and, where appropriate, the dismissal of members of the Evaluation Committees. Finally it acts to safeguard the impartiality of the work of Unibasq.

The **Evaluation Committees** are the scientific/technical bodies through which the Agency performs its evaluation, accreditation and certification functions. In each Evaluation Committee academics, students and professionals are represented. In order to carry out these evaluation activities the Agency has set up Evaluation Committees in the following areas:

- Study programmes (by knowledge field)
- AUDIT
- DOCENTIA
- Accreditation of academic staff
- Evaluation of the performance (teaching, research and management) of the academic staff

- New Committees (labels, university recognition, ...)

The **Ethics and Guarantees Committee** evolved from just being the Ethics Committee to supervising the correct implementation of Unibasq's evaluation, certification and accreditation procedures and the correct application of its Ethics and Guarantees code. In addition, this body has been charged of handling the appeals against the agency's assessment procedures. The reasons why evaluations could be declared null are if the Committee sees risk of impartiality of some expert or if during the procedure some defence right is broken. It meets periodically, at least twice a year.

The **Consultative Students Committee** for student involvement is established in order to enhance student participation. It is composed of the students who are part of the Governing Board, Advisory Board and of some of the Evaluation Committees. This Committee started working in 2015 with a view to widening and systemising the participation of students in Unibasq's review activities and advising the Agency on projects with a direct impact on the student body, like training activities for students regarding quality assurance in Higher Education.

Furthermore, Unibasq has several internal committees composed of staff members:

- The **Quality Committee** meets periodically in order to ensure the correct implementation of the Quality Handbook and procedures.
- The **Committees for Equality** was created in 2017, with goals for that year that included writing a plan for equality that had objectives such as training, family reconciliation, use of non-sexist language and the inclusion of gender perspective in degree evaluation processes.
- The **Committee for the promotion of the use of the Basque language** was set in 2014 with the intention of boosting the use of the Basque language in all the activities of the Agency.

ESG COMPLIANT QUALITY ASSURANCE ACTIVITIES

Unibasq is an important instrument for the promotion and assurance of quality in the Basque higher education system. The purpose of Unibasq is the assessment, accreditation and certification of quality in the area of the universities in the Basque Country.

Unibasq has requested this review in order to apply for the renewal of its membership of ENQA and EQAR. This review has analysed Unibasq's activities that are within the scope of the ESG as defined in the Terms of Reference for this review (see Annex 2). The following activities of Unibasq have been addressed in this external review:

- Programme ex-ante accreditation and authorisation in the Basque University System;
- Follow-up of the study programmes of the Basque University System;
- Review of the study programmes modifications;
- Accreditation renewal of study programmes;
- Audits (IQAS audits);
- Docentia.

Institutional level external reviews

DOCENTIA

In 2007, ANECA and the regional agencies, including Unibasq, set up DOCENTIA aimed at supporting universities in designing their own mechanisms for the management of the quality of the activities of their teaching staff and in boosting staff development and recognition. The DOCENTIA programme evaluates the design and implementation of the procedures for appraising the performance of teaching and researching staff, and training and motivation programmes to ensure their teaching

qualifications and skills. The DOCENTIA-programme is implemented at the level of the university. It, therefore, required institution-wide policies for the internal quality assurance of teaching quality.

In August 2018, the three universities of the Basque University System participated in DOCENTIA throughout its various stages: Design of the Assessment Handbooks, External Assessment of the Designs (desk-based review of the evaluation model proposed by the institution), Implementation and Follow-Up (desk-based review of the implementation phase) and Certification (including a site visit to the institution).

AUDIT

The purpose of AUDIT is to favour and strengthen the development and implementation of Internal Quality Assurance Systems (IQAS) at universities. It aims mainly at guiding university faculties and schools in designing their own IQAS. Since 2007, Unibasq performs AUDIT reviews using the procedures that were initially developed by ANECA in collaboration with AQU Catalunya and ACSUG. Subsequently, Unibasq developed a procedure for the delivery of “certificates” attesting different stages of achievement of IQAS (design and implementation). The review of the design is a desk-based review done by the AUDIT Committee. For the certification of the implementation a panel visits the institution and checks the efficiency of the IQAS.

By August 2018, all the centres of Deusto and Mondragon Universities have been AUDIT-certified. Within UPV/EHU, as a result of the internal reorganization of its centres which meant some mergers, not all entities have managed to achieve this certification, yet. In August 2018 48.5% of the faculties and schools of the Basque University System had their IQAS certified and 8 more faculties were planned to be reviewed by the end of 2018 (which would mean 73% of IQAS certified).

Since 2017, Unibasq offers universities which base their internal quality assurance system on the Advanced Management Model the opportunity to receive a joint review to obtain both AUDIT-certification and EUSKALIT-certification, which is based on the Advanced Management Model.

Programme level external reviews

Official university study programmes must undergo an external evaluation process conducted by Unibasq in several stages; the first stage, prior to implementation of the study programme (Bachelor’s Degree, Master’s Degree and Doctorate studies) consists of an ex-ante “accreditation” of the proposal; this means mainly that the university may offer the programme and it leads to an official qualification. After the start of the implementation of the study programme, in the second stage, Unibasq carries out a follow-up procedure. In the third stage, once the study programme has been fully implemented, it must undergo a cyclical ex-post accreditation procedure in order to maintain its status as an official study programme (accreditation ex-post), after 4 years for Master’s Degrees and 6 years for most Bachelor’s Degrees (7-8 years for those carrying 300-330 ECTS respectively) and for Doctorate programmes.

Ex-ante accreditation (verification)

A positive evaluation by Unibasq is required before the Basque government may approve a new official programme; this local requirement comes in addition to the national requirement that all new programmes need a positive ex-ante evaluation before they can become “official” (accredited), i.e. with validity throughout the Spanish territory and enter the Register of Universities, Centres and Degrees (RUCT). Unibasq evaluates the proposed study plans before their implementation to ensure, a priori, the coherence of the proposed course of study, and the availability of sufficient human and material resources, responding to the following criteria in line with the Royal Decree 1393/2007, and subsequent updates, and the Basque Decree 274/2017.

The Agency's corresponding Study Programmes Evaluation Committee (by field: Sciences, Health Sciences, Engineering and Architecture, Arts and Humanities, and Social Sciences and Law) conducts the evaluation of the degree proposal submitted by the University. This is a desk-based review and the corresponding Committee issues an ex-ante accreditation report regarding the fulfilment of the legal requirements and the abovementioned criteria, which is binding in nature, and includes, as applicable, recommendations to be analysed during the follow-up procedure.

Follow-up (monitoring)

The main responsibility for follow-up in between two accreditation rounds is assigned to the university, with Unibasq monitoring the compliance with the project laid down in the validated study plans. This procedure aims to provide universities with an external review of their practical implementation with a view to further enhance them and to prepare the following stage (i.e. the ex-post accreditation procedure). This procedure aims to:

- Ensure that programmes are delivered as initially projected, together with the modifications favourably received and authorised, as appropriate, by the Regional Governments.
- Ensure the public availability of relevant information for the stakeholders.
- Detect any possible deficiencies in the effective delivery of the study programme, and to analyse any actions taken.
- Make recommendations and/or suggestions for improvement during the implementation stages of the study plan.
- Identify good practices for their dissemination.

This is a desk-based review taking into account the same criteria as in the ex-post accreditation procedure.

Review of changes in official programmes (modification)

Minor changes to improve a degree programme can be introduced autonomously, while substantial modifications to an accredited degree that imply alterations to its structure, nature or objectives require approval by Unibasq. In this case the Agency's corresponding Study Programmes Evaluation Committee delivers a report regarding the coherence of the modification proposed. This is a desk-based review taking into account the criteria mentioned in the ex-ante accreditation. In order to make this communication less burdensome, universities may communicate these changes in their annual follow-up reports.

Accreditation (ex-post)

The ex-post accreditation procedure, which started in 2014, consists mainly in guaranteeing that official study programmes are actually being delivered at the level of quality that was initially promised. All recognised degree courses must undergo accreditation within six years of validation (or within six years of a previous accreditation) in the case of Bachelor's and doctoral/PhD degrees, and four years in the case of Master's degrees.

The objectives of this procedure are:

- To assure the quality of the programme offered taking into account the legal regulations. One of the items to be assessed is the quality of the outcomes of the study programmes.
- To guarantee that the study programme is delivered according to the latest accredited version of the proposal, that it is conducted with the appropriate resources and supported by an internal quality assurance system that enables reflection and effective improvements to be incorporated.
- To guarantee that the study programme has undergone an appropriate follow-up process, both internal and external, and that the available quantitative and qualitative information has been used to analyse its performance and to generate the pertinent actions for improvement.

- To ensure the availability and accessibility of public relevant information that may be useful to users' and agents' decision-making or of interest to the University System.
- To provide recommendations and/or suggestions, for improving the study programme, that support the internal processes for enhancing the quality of the programme and its delivery.

In this procedure, there is a review by a panel including a site-visit to the university. Afterwards the corresponding Study Programmes Evaluation Committee delivers a binding report so the University Council can issue its decision for the renewal of the accreditation of the programme.

Artistic study programmes

Higher education programmes in the field of the Arts are regulated separately. Unibasq is competent to perform the ex-ante evaluation of Higher Education Artistic Study programmes in the Basque Country. In this case, Unibasq's evaluation report is submitted to the Spanish Ministry in charge of higher education for the official approval of the programme. It is a desk-based review which is very similar to the ex-ante accreditation procedure for official study programmes and the following dimensions are reviewed: description, justification, skills, students' access and admission, study plan, academic staff, resources and services, expected outcomes and schedule. In this report remarks on the ex-ante accreditation are also considered to be applicable for the reviews of artistic study programmes, unless explicitly mentioned.

International quality assurance

Unibasq may also carry out evaluation, accreditation and certification activities at higher education institutions outside the Basque Autonomous Region on the basis of prior agreements signed with other regional, national or foreign agencies, universities or educational authorities. A first instance of such activity outside the Basque Country started recently, when Unibasq signed an agreement with the University of Aconcagua in Chile, with whom a pilot review of their Bachelor degree in Law is planned for the end of 2018. Those procedures are very similar to the procedures carried out in the Basque Country, only excluding sometimes elements which are specific to the Basque higher education system. Unless explicitly mentioned otherwise, the judgements on the ex-post accreditation procedure in this report apply also to international quality assurance.

FUTURE EVOLUTIONS IN THE EXTERNAL QUALITY ASSURANCE SYSTEM IN THE BASQUE COUNTRY

The panel has been informed about several evolutions in the Basque higher education system. As those activities are not implemented, yet, they are not subject to this review. In order to inform the reader about the broader context, the plans for future evolutions in the system are described in this paragraph.

Institutional accreditation

An important evolution in the Basque and Spanish higher education system is the introduction of the possibility of institutional accreditation for university centres (faculties and schools). The 2015 Royal Decree on institutional accreditation created the possibility for university centres to obtain self-re-accrediting power for existing programmes on two conditions:

- The centre or faculty must have received the above-mentioned IQA implementation certification.
- At least half of the bachelor and half of the master programmes offered by the centre of faculty must be accredited (ex-post).

The establishment of new programmes will still require ex-ante accreditation by Unibasq

At the time of this ENQA review, the first stage of the institutional accreditation procedure was about to start in Spain. The procedure to be followed is described in a Resolution of 7th of March of 2018 of the Universities General Secretariat of Spain. This first stage is practically automatic if the two

conditions mentioned above are met. Once the institutional accreditation is awarded, all study programmes under the control of the institution (or faculty or school) are deemed to be accredited from the same date with a validity of five years. The second stage of this procedure, the reaccreditation procedure, which is still to be designed, will be agreed and developed among the Spanish agencies within the REACU network and will be approved by the University Policy General Conference.

Assessment of Innovative teaching, Dual learning and Internationalisation

The Basque Decree 274/2017 of December 19th has established that all Basque official study programmes will be classified in different levels under three categories:

1. Innovative methodologies based training;
2. Internationalisation;
3. Links with companies, institutions and other socio-economic organisations.

All programmes will be reviewed to be classified in the two basic levels. A label for 'excellence' in each of the categories will be attributed based on a voluntary procedure. As a first step to implement this this label for the category "Links with companies, institutions and some other organisations", Unibasq has developed the methodology for reviewing "Dual learning". This label evaluates learning systems which combine learning at university and at a working environment. The objective of this programme is to evaluate the Bachelor's and Master's Degree study programmes' proposals to obtain recognition of "Dual Learning". This recognition may extend throughout the whole study programme, or a part of it. All degrees in the Basque University System registered in the Registry for Universities, Centres, and Degrees (RUCT) may apply for this recognition.

In the coming years, Unibasq also aims to develop the methodology for reviewing Internationalisation and Innovative methodologies based training. The agency plans to focus on student-centred learning in the Innovative methodologies based training label.

In addition to the labels at programme level, labels at institutional level could be developed in areas regarding e.g. research, knowledge transfer, social responsibility, and internationalisation. No specific plans have been developed in order to do so.

Evaluation of academic staff

Unlike what is common in most European countries, in Spain quality assurance agencies are actively involved in the evaluation of individual academic staff members. Several procedures are in place:

- Individual **accreditation of teaching and research personnel** to allow them to become eligible for positions at public universities and at private universities of the Basque University System (staff "Accreditation" since 2008).
- **Evaluation of the individual performance of teaching and research personnel** of the public University of the Basque Country (UPV/EHU) in order to determine who should get a share of the budget for extra compensation ("bonus") earmarked by the Government of the Basque Country for high-performance academic staff (since 2007).
- Evaluation of the permanently contracted teaching and research personnel of the University of the Basque Country (UPV/EHU) for the **validation of six-year periods of research activity** that serves nation-wide as a basis for the promotion of academic staff (since 2010).
- Evaluation of the research activity of universities' teaching and research personnel without a permanent contract (**Ikertramos**). This new evaluation procedure will be regulated by an agreement between Unibasq and each university (since 2017).
- Research activity assessment for the teaching and research personnel of the universities which are contracted according to the Article 22 of the Law 14/2011 about Science, Technology and Innovation (**Iker22**). The evaluation procedure will be regulated by an agreement between Unibasq and the university. The aim of this review procedure is to see

the evolution of the research activity and performance of the researchers contracted as stated in the abovementioned article (since 2018).

CONSULTING ACTIVITIES OF THE AGENCY

Next to their external quality assurance activities, agencies may develop consulting activities. Those activities fall outside the scope of the review as defined in the Terms of Reference and, therefore, are not considered as activities which are externally assessed against the ESG.

Títulos propios

In the Basque University system there are study programmes that lead to diplomas or qualifications issued by the university itself, and are therefore called “títulos propios” in Spanish (awarded by the higher education institution itself, not the State). They exist mainly at postgraduate level. Unibasq has a consultancy agreement with the UPV/EHU to provide a report on all new study programmes of this type. In this case, the evaluation consists of a report based on the university’s internally defined evaluation criteria. It is a desk-based review that looks into four dimensions: training programme (academic planning, if applicable, internships and review systems); academic staff (adequacy of the academic commission and the teaching staff); students (access requirements, support systems and their participation in the improvement of the programme); and management (funding, administration staff and infrastructures and resources). This report serves as input for the internal policy making of the UPV/EHU.

Recognition of new universities

Royal Decree 420/2015 of 29 May 2015, about the creation, recognition, authorisation and verification of universities and university centres, and regional Law 3/2004 on the Basque University System, require that new Universities that plan to operate in the Basque Country require a positive ex-ante report from Unibasq for their creation and recognition, which is a desk-based review the agency prepares for the Basque Government in order to recognise new universities.

Review of institutional agreements

On behalf of the Basque Government, Unibasq evaluates the fulfilment of the institutional agreements signed between the Basque Government and each of the universities in the Basque University System annually. The main purpose of these agreements is to mobilise universities for the achievement of the specific objectives established in the regional University Plan. Unibasq has reviewed the indicators and the activities done and made a report for the Basque Government since 2008.

Other consultancy tasks for the Basque Government

In addition, there are specific consultancy tasks or reports required by the Basque Government, as questions regarding the equivalence of study programmes previous to the ones adapted to the EHEA for public administration positions.

UNIBASQ’S FUNDING

Unibasq’s budget is included in the budget of the Basque Autonomous Region, annually approved by the Basque Parliament. Unibasq signed in 2016 a programme-contract with the Department of Education of the Basque Government for the period 2016-2019. The programme-contract defines the Agency’s objectives for the 2016-2019 period, as well as the activities and initiatives to be performed in order to fulfil the aforementioned objectives. The programme-contract includes a funding formula linked to the achievement of the agreed objectives and includes the economic and financial forecasting for the whole extent of the four-year period. With respect to the different types of budgetary resources, the programme-contract provides for the funding of Unibasq in 3 lines, Table 2:

- **Basic funding** includes the Agency's staff structure and the overhead costs, i.e. the Agency's current basis expenses.
- **Regular activities funding** includes all those budget lines allocated to the fulfilment to the functions and activities that are entrusted to Unibasq by Law.
- **Performance-based funding** corresponds to the activity plan in order to improve and increase its consultancy and evaluation activities, as well as to enhance the quality and the international perspective of the Basque University System.

Table 2: Overview of the Unibasq income

	2016	2017	2018	2019
Basic funding	699,795	752,857	772,482	792,713
Regular activities funding	356,461	342,143	340,518	347,287
Performance-based funding	143,744	145,000	147,000	150,000
Investment	29,411	35,000	37,000	40,000
Gvt funding	1,229,411	1,275,000	1,297,000	1,330,000
Own funding	202,739	35,857	50,482	65,713
TOTAL	1,232,150	1,310,857	1,347,482	1,395,713

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

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.

The 2014 ENQA review recommendation on 2005 standard 3.5:

- Unibasq should make its medium term ambitions and the direction it wants to head to more explicit in a formal statement.

Evidence

Unibasq activities are established in the LOMLOU (article 31) and in the regulation developing this law, as well in Act 13/2012 and in Unibasq's statutes which state that the Agency will perform the activities of evaluation, certification and accreditation of study programmes, institutions and teaching staff.

Unibasq's mission, vision and values are available on its website in Basque language, Spanish and English.

After the previous ENQA-review, the Governing Council approved the Strategic Plan of Unibasq (2016-2019). These strategic objectives are further developed into specific activities in the Unibasq's annual management plans, which are publicly available.

Stakeholders are involved in the different bodies of the Agency (Governing Board, Advisory Board, Evaluation Committees, and Students' Consultative Committee). Professionals with a proven track record in the knowledge area to be evaluated are involved as participants in the Committees for the evaluation of study programmes, and Quality Assurance experts are part of the AUDIT Committee.

Analysis

Since its establishment in 2005, Unibasq has carried out activities associated with external quality assurance at different levels. Since its registration in the European Quality Assurance Register, Unibasq has been able to extend its activities, implementing the full compulsory external quality assurance cycle at programme level, including ex-ante accreditation, modification, follow-up, and ex-post accreditation of bachelor, master and PhD programmes.

Unibasq has also played a frontrunner role in the development and implementation of voluntary external quality at the level of universities, university centres (faculties and schools), such as the accreditation of internal quality assurance systems and of quality assurance systems to guarantee the teaching quality of individual staff. Furthermore, it is in a pilot phase to assess, on demand, programmes abroad.

The agency's quality assurance activities under review generally comply with Part 2 of the ESG, but the panel has also signalled several areas for improvement under each specific section in part 2.

Unibasq's mission, vision and values are published on its website. The English version of the mission statement is more concise than the one in Basque language and Spanish. The focus "to help improve the Basque university system by promoting its quality and taking into account the interest groups involved in higher education" is, however, the same. A broad consensus exists among all stakeholders about this mission and the fact that the mission is consistently guiding Unibasq in its work. The mission is translated in clear objectives which are defined in communication with the Basque Government. Those objectives form the basis for the 4-year programme-contract with the Basque Government and Unibasq's funding is partly dependent on the achievement of those objectives.

Next to the organisational objectives, also the objectives per evaluation scheme are clearly communicated. Those objectives are often defined by law and further developed in handbooks per evaluation scheme. All handbooks are publicly available and provided in time to the entities which will be subject to the reviews. Information sessions are held, wherever necessary.

Overall, the stakeholder involvement is guaranteed, both at governance level and in the work of the agency. According to the law (Unibasq Act) the participation of students is guaranteed in institutional and programme evaluation committees. Students are also fully involved in the governance of the agency. They participate as full members in the Agency's Governing Council and Advisory Board since 2012 and in this way they are key actors in Unibasq's role in quality assurance in higher education. While the panel talked with talented and motivated students who are participating in the structures and panels of Unibasq, it noticed that they often speak from their individual perspective. They seem to lack an organised constituency with which to exchange views.

Unibasq promotes the involvement of the Basque economy and society in its activities through the participation of professionals in part of its review panels and committees. While the involvement of employers' and civil society representatives may be further increased in the bodies and panels of the agency, the panel noticed strong ties with intermediaries, such as Euskalit and the Novia Salcedo Foundation. Euskalit-Advanced Management is a private, not-for-profit organization whose mission is to promote the use of advanced management tools throughout the Basque country. Novia Salcedo Foundation is an organisation which does research on the integration of young people into the labour market and on social innovation. The cooperation with those organisations clearly adds value to the work of Unibasq.

Unibasq has undertaken a special effort in order to involve more international experts: in addition to their participation in the Governing Council (1 member) and Advisory Board (4 members), the number of international experts is increasing in the Evaluation Committees for AUDIT, DOCENTIA and some of the study programmes committees. As indicated under ESG 2.4, the panel sees still room for improvement in the international presence in Evaluation Committees and review panels, although the efforts in order to achieve this are clearly recognised.

Finally, one of the ESG Guidelines is that agencies carrying out other activities should clearly distinguish between external quality assurance and their other fields of work. The panel has noticed in its discussions with several stakeholders that a clear conceptual distinction between ESG-based evaluation and consultancy activities is lacking within Unibasq. The ex-ante evaluation of 'títulos propios' at the UPV/EHU may be considered as consultancy. This type of activity may allow the agency to diversify its activities and capitalize on its expertise. Although the panel did not find any problematic interference between evaluation and consultancy activities, it recommends the agency

to implement the relevant Guideline and, so, clearly distinguish its quality assurance activities and its other activities in its communication and daily work.

Panel commendations

- The panel commends the agency's structural cooperation with Euskalit and the Novia Salcedo Foundation.

Panel recommendations

- The panel recommends the agency to clearly distinguish its ESG-based evaluation procedures and its consultancy activities.

Panel conclusion: substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

The agency was created as Uniquel - the Quality Evaluation and Accreditation Agency for the Basque University System through Section 79 of Act 3/2004 governing the Basque University System. The Agency started its activities in 2005. In order to bring the Quality Evaluation and Accreditation Agency for the Basque University System in line with the ESG, the Basque Parliament approved Act 13/2012, of 28 June 2012, governing Unibasq – the Agency for the Quality of the Basque University System. In compliance with the new Law, Decree 204/2013 was adopted on 16 April 2013 to approve the new Statutes of Unibasq.

According to Article 2 of Act 13/2012, the Agency's aims are "the evaluation, accreditation and certification of quality in the Basque University System, taking into consideration its Spanish, European and international dimensions".

Unibasq – the Agency for the Quality of the Basque University System performs its functions within the legal form of a public entity linked to the Basque Government's department responsible for universities, but its activities are submitted to private law.

Analysis

Based on the evidence provided by the agency, it is obvious that Unibasq has a clear legal basis. Activities involving external programme review, more specifically validation, modification and accreditation are activities carried out for regulatory purposes. Additionally, the agency is allowed to offer voluntary quality assurance services to higher education institutions.

Panel conclusion: fully 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.

Evidence

The Basque Act 13/2012 regulates the existence and operation of Unibasq - together with its Statutes - ensure the independence of the Agency, as can be seen in several selected paragraphs from the Act:

In the introduction: *"(...) the agency must have official status, carry out institutional evaluation activities, be accountable for its work both to the Basque Government and society; it must also clearly and independently define its mission and have sufficient human and physical resources to fulfil it. It must work independently from governmental and university authorities and in accordance with objective, public and internationally comparable procedures and standards."*

In article 1: *"...it is a legal person of its own, with full capacity to act and full control over its own capital resources for the purpose of performing its functions in accordance with this Act."*

In article 4.2: *"The Agency must act fully independently and objectively in the performance of its evaluation accreditation and certification activities."*

In article 4.4: *"The evaluation committees must act fully independently and the result of their assessments cannot be changed by any other body of the Agency."*

In article 6.6: *"Members of the Agency's bodies act in their own name in full independence of judgement, and not as representatives of any constituency to which they may belong."*

As stated in Unibasq Act 13/2012, *"The separation between the functions of governance and evaluation is meant to fulfil the principle of independence of the agency in its evaluation activities. Hence, the Governing Board, which includes representatives from universities and the Basque Government, is responsible for the strategic governance of the agency and for setting its objectives, while the Advisory Committee is responsible for planning and organising the evaluation activities and implementing the strategic decisions"*.

The independence of Unibasq's operations is mainly based upon the operational independence of its Technical Bodies (the Advisory Board and the Evaluation Committees) whose members must be mainly from outside the Basque University System. The definition of procedures and methods for the evaluation procedures, and the appointment of external experts is the responsibility of the Director, upon the recommendation of the Advisory Board. Being a member of the scientific-technical bodies of the agency is incompatible with the holding of a single-person managerial position at any institution that may be potentially evaluated.

The outcome of each individual evaluation is the responsibility of the Evaluation Committee, which doesn't contain staff of the agency nor members of the Governing or Advisory Boards. The role of Unibasq staff is to act as methodological advisors.

The selection of experts and evaluation committees is conducted according to public requirements and the criteria set out in Unibasq's Statutes, and is based on the procedure for the selection of Unibasq experts adopted by the Agency and published on its website.

The Advisory Board is in charge of the evaluation of adequate candidates for each evaluation committee. Once the selection is made, the Advisory Board proposes the list of candidates to the Director for the corresponding appointment. Every expert has to sign his/her acceptance of the code of ethics and a declaration of confidentiality, impartiality and absence of conflict of interests.

In all evaluation procedures, the decision of the Evaluation Committee is binding, and it is transmitted to the Agency's Director for communication. In article 4.4 of the Unibasq Law it is established that "The evaluation committees must act fully independently and the result of their assessments cannot be changed by any other body of the Agency."

Analysis

The **organisational independence** is demonstrated by the aforementioned Basque legislation and in the statutes of the agency. In order to guarantee a balance between strong involvement of stakeholders in the governance of the agency on the one hand and organisational and operational independence on the other hand, a layered approach is developed taking into account the regional and Spanish context. All stakeholder groups are represented in the Governing Board, which is chaired by a representative of the Basque Government. The Governing Board is responsible for the governance of the agency in strategic and structural terms. The approval of its strategic and annual management plans, the agency's preliminary budget plan and the programme-contract are its main functions. Next to the Governing Board, an Advisory Board has been created with members who are independent from both the regional Government and the Basque universities. The Advisory Board is responsible for the development and approval of all the evaluation procedures and criteria to be used by the Agency and the submission of proposals to the Director of the agency for appointment and dismissal of members of the Evaluation Committees. This separation of responsibilities between the Governing Board and Advisory Board ensures the independence of decision-making concerning the quality assurance activities of the agency.

Although the agency has increased its own incomes through the participation in European projects, it remains largely dependent on the Basque Government for the funding of its activities. The introduction of four-year 'programme-contract' has increased the financial independence of the agency. In this programme-contract the Government and the agency agree on the activities which need to be implemented and on the funding which is provided for those activities. Although it is clear to the panel that the agency is strongly involved in the definition of the objectives stated in the programme-contract, the final decision lays with the Basque Government, which incurs a level of dependence on the Government.

The **operational independence** from external stakeholders is largely guaranteed through the legislation and the internal procedures of the agency. As indicated above, the Governing Board, which includes representatives of the different stakeholder groups, is not involved in the development of the procedures. The Advisory Board has full autonomy for this.

Formally, the appointment of external experts is the responsibility of the Director. This decision is based on a proposal by the Advisory Board. In the view of the panel this approach guarantees the independence from third parties.

The way panels and evaluation committees are composed contributes to the independence of outcomes. Based on public procedures, the panels consist of experts with different backgrounds in the academic field or the labour market and students. All experts are independent from the Basque higher education system. All experts sign the code of ethics and a declaration of confidentiality,

impartiality and absence of conflict of interests. The correct implementation of the code of ethics is overseen by an ad-hoc committee, the Ethics and Guarantees Committee.

Furthermore, the procedure to draft reports contributes to the independence of outcomes. Each panel prepares their review reports, which are finalised by the qualified evaluation committee. This committee focuses on consistency between review reports and is in charge to finalise each review report. No other body is competent to make any changes in the reports of the evaluation committees. This guarantees the independence of the outcomes. Nevertheless, the formal outcomes of all reviews remain the responsibility of the agency.

Panel conclusion: fully 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.

The 2014 ENQA review recommendation on 2005 standard 2.8:

- Unibasq should use the general findings of its external quality assurance processes more as a basis for system-wide analyses on the Basque University System.

Evidence

Article 3 of Act 13/2012 governing the agency specifically requires that Unibasq should provide society with information about the result of its activities and should provide public administrations, universities and other educational or scientific-technological agents with information and guidelines for their decision-making processes in the functional areas of the agency.

The agency publishes meta-evaluation reports for each type of evaluation procedure used at Unibasq: such reports may be annual or periodic with a view to assessing the impact and possible need for improvement of the procedures. The reflection is focused on the universities' results, in order to identify good practices and areas which need further improvement to achieve the aims of each institution.

Analysis

One of the changes in the 2015 ESG in comparison with the previous version is that the actual purpose of this standard was made even more explicit. The purpose of this standard is to encourage agencies to use and disseminate findings of their external quality assurance activities through the analysis and publication of generic conclusions which result from the aggregation of individual quality assurance procedures. The Guidelines clarify what is expected: *"In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts. A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty."* (ESG 2015, 3.4 Thematic analysis)

The agency mentions in the self-assessment report a detailed overview of reports it publishes regularly on its activities and procedures. The panel has reviewed those reports in order to evaluate whether they comply with the aforementioned interpretation of thematic analyses.

In the opinion of the panel the agency has made clear progress in this area in recent years. It reoriented the focus of its meta-evaluation reports in order to comply with the requirements of this Standard. Those reports show a clear shift from the evaluation of the procedures to a kind of thematic analysis. Also, the summary report of those reports analyse and summarize the results of quality assurance procedures, and thus are considered as thematic analysis. The 'Memoria' reports which have been published in 2017 per Evaluation Committee are good examples of how outcomes of individual procedures can be summarized and aggregated in order to present general findings to the public. Those reports contain details on the number of evaluations, but also on the results of those evaluations, good practices and recommendations for improvement. In the evaluation of the AUDIT-programme published in 2018 the focus still lies mainly on the procedure, with only a short summary of good practices and recommendations for improvement. The panel encourages the agency to further develop those reports in order to make the findings accessible to other institutions and the broader public.

Although the review panel also values the range of other reports Unibasq has produced in the past, the following reports and other communication efforts are not considered as thematic analysis as it is defined in the ESG:

- Annual activity reports: those reports provide an overview of the activities of the agency's activities, but do not present an analysis of the outcomes of the review procedures.
- ANECA-report on the status of external quality assurance of Spanish universities: this report, to which the agency contributes with data on quality assurance in the Basque country, provides an extensive overview of the external quality assurance efforts which are made in Spain, but do not present an analysis of the outcomes of the review procedures.
- The monographic reports published in collaboration with the Novia Salcedo Foundation provide valuable insights on employability but those reports do not relate directly to the outcomes of the reviews performed by Unibasq.
- Similarly, the Summer Courses and the reports published on those events are a good way to involve Basque society in relevant debates on the improvement of higher education in the Basque country, but a stronger link to the outcomes of the agency's review procedures is needed to consider those activities and reports as thematic analysis.
- The Observatory of the Activities of the Basque University System has been established recently as the platform where the general public should find data on all official higher education programmes offered in the Basque country. Until now, the panel perceives the Observatory mainly as a source of raw data, which are valuable but not very accessible for students.

The panel acknowledges those efforts to inform a broad range of stakeholders about the work of the agency. It encourages the agency to build on those efforts and complement them with more qualitative analyses of the outcomes of review procedures in order to allow programmes and institutions to learn from each other and inform society even better on the quality and the diversity of the Basque higher education system.

So, overall, the review panel recognises that in recent years resources have been liberated to go beyond the publication of individual review reports and to provide more information to a broad audience about the work of the agency and the higher education system. The agency provides some thematic analysis on all of its evaluation procedures and, so, complies without doubt with this

Standard. Nevertheless, there is room for improvement, both by deepening the thematic analysis which are already made and by complementing other reports and the Observatory with analysis of the outcomes of individual review procedures.

In order to achieve full compliance with this Standard, the panel encourages the agency to develop a clear strategy on how to structurally embed the practice of the publication of thematic analyses in its strategy and daily work, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform (potential) students, the regional Government and society at large, and to serve as input for further quality improvement within the higher education system. Indeed, in the meetings with the agency, no clear vision on how to further develop the agency's approach to thematic analysis has been expressed. The panel, therefore, considers as a first necessary step the development of a clear vision and strategy on thematic analysis. This strategy should ensure that thematic analysis becomes a transversal process within the whole agency. Outcomes of individual review processes should be analysed and summarised to provide valuable knowledge to (potential) students, the regional Government and society at large. Those results can also serve for quality improvement within programmes, higher education institutions and at system level and work in synergy with other dissemination initiatives such as the summer courses.

Panel recommendations

- The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its strategy and daily work, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform (potential) students, the regional Government and society at large, and to serve as input for further quality improvement within the higher education system.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

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

The 2014 ENQA review recommendation on 2005 standard 3.4 and ENQA criterion 8:

- Unibasq should try to diversify its income in order to become less dependent from the Basque Government funding.
- Unibasq should receive resources in order to play an active role within ENQA.

Evidence

Over 95 percent of Unibasq's budget is provided directly by the regional Government. The agency's budget is included in the budget of the Basque Autonomous Region, annually approved by the Basque Parliament. Since 2016, this budget is based on a four-year programme-contract which the agency signs with the Department of Education of the Basque Government. The first programme contract covers the period 2016-2019.

As indicated above, the funding based on the programme-contract consists of a basic funding (60%) which covers the agency's overhead, a funding for regular activities (26% in 2018) which is linked to the fulfilment of the activities that are entrusted to Unibasq by Law, and a performance-based funding (11% in 2018) which corresponds to priorities which are agreed between the agency and the

Government. Specific objectives in this programme-contract are the improvement of the organization's structure and operations, to increase the staff motivation, the ethic compromise and internal communication, in order to face the challenges of the agency since its entrance in ENQA and EQAR. Furthermore, the agency receives some funding for investments. Overall, the budget provided by the regional Government amounts 1.3 million euro per year.

Unibasq has a team of 13 people, consisting of the director, the deputy director and an economy and finance manager, three evaluation process managers, an internationalisation and projects manager, three evaluation technical staff and three evaluation assistant staff, and finally an executive secretary. Out of the 13 members of the staff, three are still temporary but Unibasq intends to issue a public employment announcement, in order to stabilise its technical personnel (by hiring permanently one part-time and two full-time evaluation technical staff).

Since 2014, the agency received budget to hire additional three staff member considering the agency's new functions and responsibilities after the positive ENQA review which lead to the membership of ENQA and EQAR. This allowed the agency to start new procedures and activities and the participation in the activities of ENQA and some other international networks. The former Evaluation Manager became the new Internationalisation and Projects Manager, which made it easier to focus efforts in this direction: Unibasq is currently part of several international working groups and takes part in two European projects, and its Director was elected as ENQA Board member in October 2016 and its Internationalisation and Projects Manager became ECA Board member in June 2018.

Unibasq makes sure that all of its staff are properly trained and provides training opportunities based on a needs analysis.

Unibasq's headquarters, provided by the Basque Government Department in charge of universities, are located in the city centre of Vitoria-Gasteiz (c/ San Prudencio 8) and can easily be reached by public transport. The office space covers 328 m² and is divided into several areas: reception, management, offices and working areas, meeting rooms, computer room, archives and rest area.

As a public legal entity, Unibasq is required by Basque Law to submit itself to a formal annual economic and financial audit. These audits have always been fully favourable. This provides evidence that Unibasq has sufficient resources to carry out at the agreed level of quality all the various activities set out in the programme-contract and the Annual Management Plan.

Analysis

Overall, Unibasq remains largely dependent on Government funding. Although efforts are made to complement the Government funding with some fees for individual staff evaluations, international projects and some consultancy, those incomes are limited to a minor part of the overall budget.

The introduction of four-year programme-contracts allows the agency to plan and secures the sustainability of its activities within the scope and in line with the ESG. In order to further guarantee the sustainability of its activities it is crucial to secure the approval of a new programme-contract with the Government for the period 2020-2023.

Based on its meetings with different stakeholders, the panel is convinced that the agency has adequate and appropriate resources, both human and financial, to carry out its work. Nevertheless, several stakeholders signalled that the agency is only able to fulfil all its duties thanks to the very efficient organisation and the long-standing and qualified team. The panel commends the management and the team for the work they have carried out over the past years. Nevertheless, the

current balance remains fragile and the panel recommends the agency to continue to search for ways to diversify its incomes.

As indicated under ‘thematic analysis’, the agency has achieved to develop a basic level of thematic analysis with its current capacity. Nevertheless, dedicated staff and resources will be necessary if the agency wants to fully exploit the potential and to better unlock the results of the individual review procedures. In order to embed this in the regular activities, additional resources might be necessary.

The agency has received additional funds from the regional Government in order to play an active role in ENQA and other international networks and projects. Those resources have allowed the agency to play a very active role in the international quality assurance community. The panel commends the agency for this active role.

Panel commendations

- The panel commends the management and the team for the efficient and effective use of the resources the Government provides.
- The panel commends the agency for the resources it has mobilized to play an active role in the international quality assurance community.

Panel recommendations

- The panel recommends the agency to continue to search for ways to diversify its incomes.
- The panel recommends to ensure that enough resources are available to extend its work on thematic analysis.

Panel conclusion: substantially compliant

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.

Evidence

Unibasq’s Act establishes in its article 5 “Accountability” that the agency must be accountable to its internal bodies, to the Basque Government and more generally to society for the results of its work.

Since 2015 Unibasq applies the Advanced Management Model as the framework for its internal quality assurance, evolving from an ISO 9001 approach in its early years. The agency’s internal quality assurance system has been certified by Euskalit in 2017. Unibasq plans to undergo a new external review following those principles in 2019.

The internal Quality Committee meets periodically in order to ensure the correct implementation of the Quality Handbook and all internal procedures. Based on this work it provides input for the strategic and annual plan to integrate improvement measures.

Unibasq has created internal and external feedback mechanisms that lead to a continuous improvement within the agency; internal and external surveys are carried out regularly by Unibasq in order to gather information aimed at enhancing the agency’s activities. The agency applies procedures and tools guaranteeing the periodic revision and continuous enhancement of its activities.

For this purpose, the following approaches have been defined:

- A selection of indicators to monitor the implementation of Unibasq's Strategic Plan used in the periodic general revision of the agency's actions in fulfilment of its mission.
- A meta-evaluation process, including surveys to everyone involved, meetings with the chair persons of the committees, meetings with the universities, etc., is in place for every evaluation procedure, in order to further improve it on the basis of an in-depth analysis and a review by the Advisory Board.
- A dialogue with the universities is maintained throughout the agency's evaluation procedures. Meetings are held between the universities and the agency staff involved (jointly and individually for each university). Moreover, every year Unibasq visits each of the 3 universities; during these meetings the outcomes of the last reviews are being discussed, universities' suggestions are sought and any updates on the procedures are communicated.

Unibasq ensures that all persons involved in its activities are competent and act professionally and ethically. Unibasq has undergone a reorganization process, redistributing the functions and appointing area coordinators in order to make sure each activity is performed in the best way possible. Panel and committee members are selected from a database based on their expertise. In order to guaranty that everyone involved in the agency's activities acts ethically, everyone is required to sign a declaration by which they adhere to the agency's code of ethics and guarantees and to declare the absence of any conflict of interests.

Unibasq invests in the prevention of intolerance and any kind of discrimination. Unibasq applies the principle of equal opportunities and non-discrimination in its internal and external screening processes, in all selection processes for representatives and in all activities and accreditation procedures. Gender equality/parity criteria are applied in the composition of the evaluation committees. Moreover, Unibasq has created an Equality Committee to develop and implement opportunities within this area.

Unibasq invests in appropriate communication channels and close cooperation with the relevant authorities. Next to the representation of the Basque Government on the agency's Governing Board, periodic bilateral meetings are also held in order to tune the vision of the agency and the Government.

Analysis

The agency clearly defines processes and procedures for all its activities. It also has structures in place for assuring and enhancing the quality and integrity of its work. All review procedures are evaluated regularly involving all stakeholders, leading to so-called meta-evaluations which are the basis for continuous improvement of evaluation procedures.

The ESG require the publication of internal quality assurance policies on the agency's website. Unibasq's internal quality assurance policy is not easily accessible on its website. The panel encourages the agency to ensure that documents on internal quality assurance are easy to find on the agency's website.

Moreover, the panel recognises the efforts by the agency to implement processes for internal quality assurance taking into account the European Standards and Guidelines. The agency listed the recommendations of the previous ENQA review and indicated how those have been implemented. Efforts have been made in order to implement most of the recommendations. Nevertheless, while the agency generally qualifies the efforts as completed, the panel does not consider that all of the recommendations are fully implemented yet. For example, the dependence on funding by the

regional Government and the self-critical nature of self-evaluation reports still offer room for improvement.

Unibasq has invested much time and effort in reviewing the former Code of Ethics (2012) and defining and eventually adopting in 2016 a Code of Ethics and Guarantees and setting up an Ethics and Guarantees Committee. The Committee evolved from the former Ethics Committee. The panel commends the Committee's thorough evaluation of the agency's procedures guaranteeing the ethical behaviour of everyone involved with the agency and improved the procedures on conflicts of interest.

The Committee for Equality was created in 2017, with goals for that year that included writing a plan for equality that had objectives on training, family reconciliation, use of non-sexist language and the inclusion of gender perspective in degree evaluation processes. The panel appreciates the work of this committee on gender, which clearly has an impact on the whole agency. As a next step, the panel encourages the committee to broaden its approach and integrate other groups in society which might face discrimination or fewer opportunities.

The agency has an open communication with the regional Government, which guarantees that government policies take into account the input provided by Unibasq.

Panel conclusion: fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

Art.5.5 of Act 13/3012 governing Unibasq states "The agency must undergo every five years an external evaluation process involving the participation of international experts." In compliance with the law, Unibasq underwent its second external evaluation in 2018. The previous one took place in 2014.

Additionally, Spanish legislation establishes that, as a requirement for the conduct of certain activities such as the ex-ante accreditation of study programmes or institutional accreditation, quality assurance agencies "should be registered under EQAR after successfully passing an external evaluation in accordance with the European Standards and Guidelines for Quality Assurance of Higher Education".

Analysis

Both the regional legislation and the current regional Government confirm that Unibasq should function in line with the ESG and that it should be externally reviewed every five year. Additionally, Spanish regulation requires registration under EQAR as a prerequisite to perform ex-ante and ex-post accreditation independently as regional agency.

Next to the legislative context which requires external reviews at least every five years, Unibasq is also intrinsically motivated to undergo a cyclical review at least every five years so as to renew its ENQA and EQAR membership by demonstrating compliance with the ESG and the steps taken to follow up on any recommendations provided.

Panel conclusion: fully 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 1 of the ESG.

The 2014 ENQA review recommendation on 2005 standard 2.1:

- Unibasq should re-evaluate whether the assessment of students could be evaluated more systematically within the different evaluation schemes.
- Unibasq should also focus its mandatory evaluation schemes on the compliance of the internal quality assurance of higher education institutions with Part I of the ESG.

Evidence

The activities of Unibasq are subject to national and regional regulation and the degree of regulation is comprehensive. The legal framework assigns a substantial number of tasks to the agency, which range from the implementation of programme accreditation to institutional reviews. These include several reviews of individual staff members of higher education institutions. In the introductory part of this report, the different activities have been described in more detail.

Unibasq has worked towards the goal that its external quality assurance procedures are comprehensively designed and carried out taking into account the effectiveness of the internal processes described in Part 1 of the ESG. According to the agency, all the activities related to programme evaluation, as well as the AUDIT programme contribute to the 10 standards of Part 1. The DOCENTIA programme does not focus on student admission, progression, recognition and certification (1.4).

The table below is an extract from Unibasq's self-assessment report (pages 57) indicating the alignment of Unibasq's evaluation schemes with the ESG, Part 1.

Table 3: Self-assessment of the compliance with ESG Part 1

ESG Part 1	STUDY PROGRAMMES EVALUATION				INSTITUTIONAL EVALUATION	
	EX-ANTE ACCREDITATION	MODIFICATION (*)	FOLLOW-UP	ACCREDITATION RENEWAL	DOCENTIA	AUDIT
1. Policy for quality assurance	9	9	3	3	1	1.0
2. Design and approval of programmes	2, 5 & 8	2, 5 & 8	*1	*1	2	1.1
3. Student-centred learning, teaching and assessment	5 & 8	5 & 8	1 & 6	1 & 6	2	1.2
4. Student admission, progression, recognition and certification	4	4	1.4 & 1.5	1.4 & 1.5	NA	1.2
5. Teaching staff	6	6	4	4	1, 2 & 3	1.3
6. Learning resources and student support	7	7	5	5	2	1.4
7. Information management	8 & 9	8 & 9	3 & 7	3 & 7	2	1.5
8. Public information	4	4	2	2	1 & 2	1.6
9. On-going monitoring and periodic review of programmes	8 & 9	8 & 9	1 & 3	1 & 3	2	1.1
10. Cyclical external quality assurance	*1	*1	*2	*3	*4	*5

Analysis

In the following paragraphs the panel describes to which extent the external quality assurance procedures used by Unibasq assess the effectiveness of higher education institutions' internal quality assurance processes in relation to the standards described in Part 1 of the revised ESG.

The panel's analysis is done on the basis of a re-assessment of the consistency of the evaluation procedures with ESG Part 1. Hence, the table above does not provide much explanation of how the evaluation criteria are aligned exactly to the ESG. Based on its re-assessment, the review panel is of the opinion that some of the references provided by the agency are not fully supported by the evidence provided in the specific guides.

1.1 Policy for quality assurance

Unibasq requires that universities implement comprehensive quality assurance policies. This item is considered both in compulsory study programme evaluation procedures (ex-ante accreditation, modification, follow-up and ex-post accreditation) and in voluntary institutional evaluation procedures: DOCENTIA deals with quality assurance with respect to teaching staff, and AUDIT specifically reviews the internal quality assurance mechanisms developed by higher education centres and universities.

In the new legal framework for institutional accreditation, certification of the quality assurance system is one of the mandatory requirements in order to obtain this accreditation.

Overall, the procedures focus on the presence of processes for internal quality assurance, taking into account stakeholder feedback. The strategic perspective to whether the activities form part of the institutions' strategic management receives less attention in procedures at programme level. In the AUDIT certification framework reference is made to the existence of mechanisms to take decisions on the offer of educational programmes. How well these mechanisms work is not tackled explicitly. In the DOCENTIA programme the link to the strategic plan is explicit.

1.2 Design and approval of programmes

In the Basque Country, official study programmes require an external assessment before they may be offered (ex-ante accreditation). The design of programmes is also reviewed in the other compulsory study programme evaluation procedures (modification, follow-up and ex-post accreditation). The AUDIT procedure not only evaluates the current design of specific programmes, but also evaluates the processes for the design and approval of programmes. This element is less present in the compulsory procedures at programme level. As the DOCENTIA programme is oriented primarily at the evaluation of the teaching quality of teaching staff, it refers less explicitly to the design and approval of programmes as a whole.

1.3 Student-centred learning, teaching and assessment

The major change in the 2015 ESG is the focus on student-centred learning. This standard focuses on how students are encouraged to take an active role in creating their learning process. The assessment of students should reflect this. The panel noticed that none of the stakeholders it discussed this issue with demonstrated an acknowledgement of the significant change which is required in order to fully adapt the agency's procedures to the focus of this standard. Student-centred learning is often explained as increasing the quality of teaching, through diversifying teaching methods, taking into account students' workload and an increased focus on competence-based learning. Those elements are clearly valuable, but there is a need to further strengthen the focus on student-centred learning. Student-centred learning can be implemented in different ways taking into account the cultural context, but it requires at least that programmes are delivered in a way that encourages students to take an active role in creating the learning process and that the assessment of students reflects this approach. In the view of the panel there is a need to build a common understanding on the particular meaning of student-centred learning within the Basque higher education system.

The current evaluation frameworks offer the opportunity to discuss aspects of student-centred learning, but this depends on the understanding of the panels of the concept. In the ex-ante evaluation of Bachelor's and Master's degrees, these aspects are reviewed as part of the criteria dealing with the planning of teaching activities and their expected outcomes. In the ex-ante evaluation of Doctoral programmes, they are reviewed when assessing the educational activities, the programme organisation and achievement of the expected learning outcomes. In the follow-up and accreditation procedures, they are part of the review of delivery and performance indicators, and achievement of learning outcomes (respectively). As the case of AUDIT, this aspect is reviewed when assessing how the centre provides student-centred study programmes. In the case of DOCENTIA, it is part of the planning of teaching activities and their expected outcomes. However, none of the evaluated procedures at programme level tackles student-centred learning explicitly. So, procedures should be further developed in order to fully take into account a student-centred learning approach. Indeed, the organisation of quality assurance and the evaluation of teaching staff requires a different

approach when students receive an active role in the design of their learning process. Teaching staff will need to be retrained from educator to coach. Assessing the quality of teaching will also require new approaches.

The panel positively notes in the draft documents for the procedure for renewal of institutional accreditation, that the concept of student-centred learning is integrated. This will be implemented within 5 to 6 years. Similarly, the quality label on innovative methodologies, which is being developed, offers opportunities to focus on student-centred learning. The panel encourages the agency to not only integrate student-centred learning in this procedure at excellence level, but also in the two basic levels.

The consequences of adapting quality assurance procedures to student-centred learning haven't been discussed strategically within the agency, yet. So, the panel recommends the agency to start a strategic exercise on how to integrate student-centred learning as soon as possible in the current procedures and consequently train all committee and panel members to create awareness and integrate this strengthened focus of the 2015 ESG on student-centred learning explicitly in the evaluation procedures the agency implements.

1.4 Student admission, progression, recognition and certification

This standard is reviewed as part of the evaluation criteria for all types of study programmes when assessing the entrance profile required from applicants, the access procedures and the academic regulations applicable to the programme. In the case of the ex-ante evaluation of Bachelor's and Master's degrees, it is part of the review of the admission of students, while for Doctoral degrees it is included in the criterion dealing with students' access and admission. It is also a component of the ex-post evaluation, which contains specific guidelines regarding entrance profile and academic regulations.

With regard to AUDIT, explicit criteria on admission and progression are part of the evaluation framework. Approaches to recognition are not evaluated explicitly. The student life cycle does not fall within the scope of the DOCENTIA programme.

1.5 Teaching staff

Quality assurance of teaching staff is an important part of the work of Unibasq. It is responsible for the evaluation of individual staff before they are hired by higher education institutions. These activities fall outside the scope of this review but do contribute to the assessment of quality of individual staff. In the procedures within the scope of this review, the agency assesses the quality of teaching practices and staff policy in several evaluation procedures. In the case of programme evaluation procedures, during ex-ante accreditation, modification, follow-up and ex-post accreditation, the quality aspects referring to the available teaching staff are reviewed as part of the standard dealing with academic staff or human resources. No specific attention is paid to the processes for the recruitment of staff. In AUDIT the staff policy is assessed, as well as how the centre or school guarantees and enhances the quality of its academic staff. Regarding DOCENTIA, quality assurance of the teaching activity is the main focus of the procedure. As indicated above, the procedure does not focus, yet, on the competences of teaching staff to implement student-centred learning. The current DOCENTIA programme focuses mainly on the quality of individual teaching staff members. In order to better support the implementation of student-centred learning, the panel recommends that the DOCENTIA programme incorporates additional dimensions of teaching, such as teaching practices in teams or leadership capabilities.

1.6 Learning resources and student support

The agency evaluates learning resources and student support in the programme reviews, including ex-ante accreditation, modification, follow-up and ex-post accreditation. Criteria are the supporting staff and services and the learning resources available for students.

In the AUDIT programme, procedures related to learning resources and student support systems are assessed explicitly. In the DOCENTIA programme, this element is only assessed indirectly as part of the guidelines dealing with methodology.

1.7 Information management

In all evaluations of study programmes (ex-ante accreditation, modification, follow-up and ex-post accreditation), this standard is reviewed as part of the Internal Quality Assurance System and of the performance indicators. It is an explicit criterion that institutions have a regular and effective system of collecting and analysing relevant information and outcomes. In the AUDIT programme it is reviewed when assessing how the centre or school analyses and takes into consideration its outcomes, and in the DOCENTIA procedure it is part of the quality review of outcomes.

Complementing the information management of the individual institutions, Unibasq gathers data on all the programmes which are centralised in the public Observatory of the Activities of the Basque University System.

1.8 Public information

Public information plays a crucial role in the external quality assurance processes of Unibasq. The agency pays particular attention public information. All programme evaluation procedures ensure that institutions publish information on their programmes. The procedures for ex-ante accreditation and for modifications evaluate this when looking into student information and admission, and the procedures for follow-up and ex-post accreditation include a standard about “Information and Transparency”. The AUDIT programme reviews how the centres (faculties and schools) guarantee the publication of information on its study programmes and its accountability. The DOCENTIA programme does not review public information explicitly.

1.9 On-going monitoring and periodic review of programmes

The external quality assurance system in the Basque university system is largely oriented to the development of internal quality assurance procedures. The positive impact on the development of those procedures is largely acknowledged by all stakeholders. After the initial ex-ante accreditation, re-accreditation is required after four (for master’s degrees) or six years (for bachelor’s degrees and PhD degrees). In between, each higher education is supposed to implement follow-up procedures and to report on its progress to the agency.

The procedures for ex-ante accreditation and modification address it when reviewing the expected outcomes and the quality assurance system (for Bachelor’s and Master’s degrees) or when assessing the revision, enhancement and outcomes of the programme (for Doctoral programmes). During the follow-up stage, it is addressed as part of the evaluation of the internal quality assurance system. For ex-post accreditation, this aspect is included in the criteria dealing with for programme organisation and development and with internal quality assurance.

Furthermore, the approval, monitoring and periodic review of programmes and awards is a crucial element in the voluntary AUDIT-programme which evaluates the internal quality assurance systems. Finally, the DOCENTIA programme does in itself not evaluate the review of programmes, but focusses on the internal quality assurance processes to guarantee the quality of individual teaching staff and

thus contributes to the overall monitoring of the teaching activities within higher education institutions.

1.10 Cyclical external quality assurance

As indicated before, Spanish law requires that programmes leading to an official university degree be subjected to an external evaluation process on a cyclical basis, as set forth in Royal Decree 1393/2007 and subsequent updates. The cycle includes ex-ante accreditation, monitoring/follow-up and ex-post accreditation. In the AUDIT and DOCENTIA procedures, the certification must be renewed every five years. This will be the same for the new institutional accreditation that is currently being introduced in Spain.

Summary

The panel is confident that the broad range of Unibasq's external quality assurance activities take into account the effectiveness of the internal quality assurance processes in the universities under review as described in Part 1 of the ESG. Based on its meetings with stakeholders, it is clear to the panel that the agency's work has contributed to the development of internal quality assurance procedures in the Basque universities which are in line with the ESG.

The 2014 review recommended Unibasq to re-evaluate whether the assessment of students could be evaluated more systematically within the different evaluation schemes. With the addition of ex-post accreditation, assessment of student receives now more attention. The panel also recommended to focus in the mandatory evaluation schemes more on the compliance of the internal quality assurance of higher education institutions with Part I of the ESG. Overall, the panel's analysis of the protocols and practice of the agency's different evaluation schemes indicates that most of the items considered in the ESG Part 1 are now covered to a substantial degree. Nevertheless, the agency should integrate the concept of student-centred learning systematically in its procedures and work (ESG 1.3).

Panel recommendations

- The panel recommends the agency integrates the concept of student-centred learning as a core element in the agency's work and in its procedures (ESG 1.3).

Panel conclusion: substantially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

The 2014 ENQA review recommendation on 2005 standards 2.2 and 2.4:

- Unibasq should consider how stakeholders' involvement could be further increased in the development of procedures, next to their representation in the Advisory Board.
- Unibasq should reconsider its procedures in order to introduce the full review model in a broader range of evaluation schemes.
- Unibasq should initiate a review of the DOCENTIA procedures in order to reduce the administrative burden of this evaluation scheme in cooperation with other Spanish agencies.

Evidence

Within the Spanish higher education system, the framework for each external evaluation procedure is defined by law. Within this framework each regional agency has some room for adaptation to their own context. Based on the legal framework and exchange with the other Spanish agencies, the technical staff prepares a draft document for each new procedure. Those proposals are discussed and approved by the Advisory Board.

All agreed procedures and criteria for evaluation are published on the agency's webpage. The purpose and objectives are defined before the procedures are developed. The purpose of each procedure is also set out in the first section of each handbook. In addition, Unibasq holds periodic meetings with the institutions undergoing evaluations, in order to discuss with them the aims, objectives and procedures of the various evaluation procedures. The outcomes of these meetings are communicated to the Advisory Board.

In order to improve their fitness for purpose, the agency has carried out pilot projects within the framework of the AUDIT (2013), follow-up (2010) and ex-post accreditation (2014) procedures. These pilots help Unibasq improving its review procedures and finding synergies among them, which allow the agency to keep as low as possible the evaluation burden imposed on the universities under review.

For each type of evaluation Unibasq's staff carries out a periodic meta-evaluation in which the participants assess the adequacy and performance of the procedure and suggest improvements for the future. The key findings of this exercise are communicated to the Advisory Board, which analyses them and makes recommendations for the improvement of the evaluation procedures.

The way in which the procedures lead to clear information to stakeholders and how follow-up is guaranteed, is described more in detail under ESG 2.3 and 2.6.

Analysis

Unibasq performs a broad range of quality assurance procedures in a highly regulated context. Often the purpose and the objectives of those procedures are defined externally. All stakeholders commend the efforts of the agency to design the procedures as efficient as possible, bearing in mind the level of workload and cost they will place on institutions. E.g. standards relating to internal quality assurance processes are no longer required to be evaluated at programme level when the programme is organised by a centre or school with an AUDIT-certification. Nevertheless, from an external perspective the level of detail in the legislation is surprising and does not contribute to the room for agencies to further optimize the external quality assurance procedures.

Wherever relevant, the agency invests in the extensive preparation of new procedures, sometimes with pilots, in order to fine-tune the evaluation schemes. Once the procedures are implemented the agency also invests in the further development of each evaluation scheme. The practice of meta-evaluation of evaluation procedures contributes to the continuous improvement of the work of the agency.

The panel values positively Unibasq's pro-activity in order to influence the design of future quality assurance processes, such as the re-accreditation at institutional level, at a moment when the initial accreditation has not been implemented, yet.

While the frameworks for evaluation procedures at programme level are largely regulated, the voluntary procedures AUDIT and DOCENTIA are defined in collaboration with the other Spanish agencies. Also in those procedures the panel notices a tendency to develop detailed evaluation

frameworks with a strong focus on the development of internal quality assurance procedures. While those procedures are in theory voluntary, AUDIT-certification is a prerequisite for institutional accreditation and DOCENTIA-certification has an impact on the regional funding schemes for universities. So, in practice universities are strongly encouraged to participate in those procedures. Especially the DOCENTIA programme is still seen by one of the universities as too prescriptive and not being fit for purpose in order to improve their own processes, but rather imposing additional obligations. The AUDIT-programme is generally valued positively, but is also considered as imposing a heavy workload on – especially – smaller universities.

Within the whole external quality assurance system the panel notices a strong focus on the development of procedures and on quantitative indicators. While these elements are crucial in the development of a real quality culture, a better balance may be found between qualitative and quantitative approaches. The panel is convinced that a better balance may help to reduce the administrative burden of procedures, increase the added value for programmes and institutions. It may also help to increase the self-critical nature of self-evaluation reports, make external reports more interesting for students and society in general and provide valuable input to make thematic analyses based on those reports. The panel recognises the potential of institutional accreditation and the labels which are currently being developed in order to make a shift in the right direction. In order to make full use of this potential, a conscious choice, and even a paradigm shift, will be needed, both within the approach of the Government and the approach of the agency. Procedures will need to focus much more on a strategic thinking approach and results and less on a detailed analysis of inputs and processes.

The panel discussed with several stakeholders how the agency's plans relating to the development of the quality assurance system for the Basque higher education system may contribute to the fitness for purpose of the system.

The planned shift to 'institutional accreditation' (at the level of faculties or schools) was generally welcomed in the discussions the panel had with stakeholders. Although the general framework has been adopted already in 2015, it is not clear yet how this framework will be implemented exactly and what the exact consequences will be. The agency plans to implement this framework with a risk-based approach, in which it will continue to implement follow-up procedures at programme level. This is also advocated by some stakeholder representatives. The panel learned that the agency is preparing a framework for the re-accreditation at institutional level. An important element to consider in this process is whether institutional accreditation should be based only on an assessment of quality assurance processes, or also include an assessment of the school or centre's strategy. It should also be considered whether there continues to be a need for a risk-based follow-up at programme level.

Next to institutional accreditation, another important evolution in the Basque external quality assurance framework, is the development of three labels which are included in the Basque Decree 274/2017 which establishes that the Basque official study programmes will be classified in different levels under these categories: 1. Innovative methodologies based training; 2. Internationalisation; and 3. Links with companies, institutions and some other organisations. As stated before, Unibasq has already developed the methodology for reviewing "Dual learning", linked to the latter category "Links with companies, institutions and some other organisations". The panel commends the agency for this label which has already increased the visibility of dual learning and which has encouraged study programmes to develop dual learning paths. In addition to this label, labels at institutional level could be developed in areas regarding research, knowledge transfer, social responsibility or internationalisation. This new framework offers the opportunity to analyse specific topics at system-

wide level. The implementation of this framework is still being designed. It will be important to take into account the workload for higher education institutions and the agency.

As indicated above, the agency considers to develop a label related to 'Innovative methodologies based training' oriented towards student-centred learning. This might be a good way to introduce student-centred learning relatively fast into the overall external evaluation framework. As all institutions implement the DOCENTIA programme, it is considered to evaluate student-centred learning mainly through this programme. In order to be able to do so, the scope of DOCENTIA will need to be broadened, as this is now the evaluation of the individual teaching quality of professors. In order to implement student-centred learning a shared approach at programme level is needed, which results in team work and approaches for which assessment at the level of the individual professor might not be fit for purpose.

The Advisory Board plays an important role in the definition of individual quality assurance procedures. The agency aims to involve all relevant stakeholders in the Advisory Board. Academics, students, professionals and international experts are all represented. Most of the members are academics. Although the panel considers it to be desirable that members of the Advisory Board act in a personal capacity, the panel considers that the input from those members representing stakeholder groups would benefit from a more structured exchange with their constituency. Furthermore, based on its discussions during the site visit, the panel got the impression that the Advisory Board invests a lot of time in fine-tuning procedures. The panel values the dedication of the Advisory Board to this work and recognises this results in well-developed and transparent procedures. Nevertheless, it seems that the agenda of the Advisory Board is filled completely with this task, while thanks to its diverse composition, it might play a more important role in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.

Panel commendations

- The panel commends the agency for this label which has already increased the visibility of dual learning and which has encouraged study programmes to develop dual learning paths.

Panel recommendations

- The panel recommends the agency to further develop its quality assurance procedures in order to further increase the fitness for purpose of the whole external quality assurance system, aiming for better balance between qualitative and quantitative approaches.
- The panel recommends to involve the Advisory Board more often at a strategic level in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.

Panel conclusion: substantially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

The 2014 ENQA review recommendation on 2005 standard 3.7:

- Unibasq should stimulate programmes and institutions more to analyse their strengths and weaknesses in the presented self-evaluation reports.
- Unibasq should reconsider whether site visits could be useful in other steps of the AUDIT and DOCENTIA schemes and in other quality procedures.

Evidence

For each evaluation scheme, the steps in the process are described in detail in a handbook which is published on the agency's website. Additionally, internal procedures are developed in order to guarantee the professional, consistent and transparent implementation of those procedures.

Most procedures, as shown in Table 4, include a self-evaluation stage (self-evaluation or equivalent documentation, submitted by the institution), the review by an assessment committee, and a report providing guidance for the actions to be taken by the institution. All reports are published on the website. In the case of procedures comprising an implementation stage (ex-post accreditation, AUDIT and DOCENTIA procedures), the evaluation includes a site visit during which stakeholders are interviewed. Follow-up is mainly the consequence of the fact that all evaluations are made on a cyclical basis. For study programmes institutions have to send a follow-up report to the agency every year. In these reports they have to provide information about how they are dealing with the recommendations from previous reviews.

Table 4: Implementing process per procedure

	Self-assessment	Site visit	Report	Follow-up
Ex ante accreditation	X		X	Follow-up
Follow-up	X		X	Ex-post accreditation
Modification	X		X	Follow-up
Ex-post accreditation	X	X	X	Follow-up
AUDIT design	X		X	AUDIT certification
AUDIT certification	X	X	X	Annual management reports Study programme follow-up reports AUDIT certification renewal
DOCENTIA design	X		X	DOCENTIA follow-up
DOCENTIA follow-up	X		X	DOCENTIA certification
DOCENTIA certification	X	X	X	DOCENTIA certification renewal

Analysis

The panel confirms that each review process performed by Unibasq is based in a framework that is reliable, publicized, and pre-defined. The evidence collected in the interviews with different stakeholders indicate that those review processes are regarded as useful and implemented consistently.

The panel confirms that the main review processes include the four steps required by the ESG. Since 2015, based on its registration in EQAR, Unibasq has achieved full competencies related to programme evaluation. This means that the agency is in charge of the full cycle of evaluation schemes at programme and institutional level. Those evaluation schemes include self-evaluation, external evaluations by experts, site visits, public reports and follow-up, although not all elements are considered relevant for each individual procedure.

The assessment process of higher education programmes in the Basque Country consists of four types of procedures. Before the start of a programme, ex-ante accreditation is required. This procedure is based on information provided by the institution and a paper-based evaluation of this application by the agency. Each institution is required to produce follow-up reports every year. The follow-up reports produced by the institutions are used as evidence in the following accreditation round. 4 to 6 years after the initial accreditation, an ex-post accreditation procedure is carried out. Ex-post accreditation is based on a self-assessment report, a site visit by peers and a published report. Overall, the panel assesses the external quality assurance framework as a comprehensive framework for external quality assurance at programme level.

In addition to the quality assurance framework at programme level, the agency implements the AUDIT and DOCENTIA programmes at a higher level within the institution. AUDIT and DOCENTIA certification are the result of a long process including external evaluation of the design and the implementation of the internal quality assurance system (AUDIT) and internal quality assurance of teaching staff (DOCENTIA). Although site visits are not in all phases foreseen, the panel considers the current approach to be in line with this Standard.

Overall, the self-critical nature of self-assessment reports may be increased. As indicated above, the panel relates this to the overall approach to quality assurance in the region and in Spain, in which a strong emphasis is put on the development of procedures and rather quantitative approaches to internal and external quality assurance. The panel hopes that a shift towards institutional accreditation and the development of specific labels will contribute to a more qualitative and reflective approach to quality assurance processes.

As described more in detail above, the agency has set up a structure with standing Committees per area of study and for the AUDIT and DOCENTIA programmes which take care for the consistency between procedures within the same evaluation scheme. This structure is widely valued for its contribution to consistency in the results of quality assurance processes.

Finally, Unibasq was at the moment of the peer review performing a first international ex-post accreditation procedure for the University of Aconcagua in Chile. This procedure is very similar to the procedure for ex-post accreditation in the Basque Country. It includes self-assessment, an external review including a site visit and the report will be published. For international accreditation procedures, which are voluntary by nature, the full responsibility to request any kind of follow-up lies in the hands of the institution.

Panel conclusion: fully compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

The 2014 ENQA review recommendation on 2005 standards 2.4:

- Unibasq should implement flexible procedures for the selection process of students in evaluation committees in order to guarantee maximal student participation.

Evidence

The general composition of the Evaluation committees is defined in Act 13/2012, governing Unibasq. The Advisory Board has approved the requirements for the selection of experts, which are published on the agency's website. The Advisory Board also analyses the experts' curricula and proposes members of the evaluation committees to the Director for their appointment. For the composition of each evaluation committee it seeks a balanced participation regarding genders (at least 40% each), knowledge areas and geographical distribution. Unibasq has its own pool of experts open to academics, students and professionals. Nevertheless, in specific cases when experts from very specific areas or with very specific profiles are needed, contacts with other agencies are made to find them. In addition, in order to increase the number of experts available some specific calls to institutions or other bodies (professional associations...) are made.

For the evaluation processes, Unibasq relies on experts of diverse profiles. The Agency has set up an online "Database of Experts", an effective tool for the management and appointment of external experts involved in evaluation processes. Based on this database, staff prepares a proposal for the composition of review panels and committees. Before any evaluation procedure takes place, the names of the participating experts are published on Unibasq's website. This allows the higher education institution to submit any reservations or objections they may have. All experts must sign a declaration in which they commit themselves to respect Unibasq's code of ethics and guarantees and declare that in case of any conflict of interest they will communicate it to the agency in order to allow it to take the corresponding measures.

Participation of students in evaluation procedures is guaranteed by the Basque Country Act 13/2012, which provides that Unibasq's evaluation committees include, among others, "students from the areas to be assessed, in the evaluation of programmes and activities that may have a direct impact on students; student members are nominated by the representative body of Basque university students". Students participate in all education and training related procedures, namely in DOCENTIA (since 2007), AUDIT (since 2012) and the evaluation of study programmes at all stages (since 2012).

Prior to the implementation of the evaluation activities, Unibasq provides the experts with briefing and training and, if necessary, further informative sessions are held at later stages of the evaluation processes. During this training process the agency provides the experts with information about evaluation management, guidelines for the preparation of evaluation reports, explanations about the evaluation guides, etc. On-line modules for the training of experts participating in the ex-post accreditation procedures are also available.

In recent years, Unibasq has made efforts to involve international experts in Evaluation Committees; they are either Spanish nationals working abroad or foreigners that are proficient in the Spanish or Basque language. In order to incorporate more international experts a Memorandum of

Understanding has been signed with the German agency AQAS and specific training sessions in Bilbao for German speaking experts and in Cologne for Spanish speaking experts have been held. Similar Memoranda of Understanding have been signed with the French agencies HCERES and CTI, with a view to integrating more French experts in Unibasq's committees, and with the German agency FIBAA.

Analysis

All procedures under review are carried out by groups of external experts which include a student member. While the recruitment of student members was a challenge in the previous ENQA coordinated review, the agency has invested time and effort in order to involve students in all procedures. A specific procedure has been introduced in order to make the appointment and replacement of students more flexible. A Students Consultative Committee has been created in order to structure contacts with students. Unibasq also introduced training activities about quality assurance in higher education which are held twice a year to inform a broader group of students about the work of Unibasq.

The agency never includes in panels academic staff who are active within the Basque higher education system in order to guarantee their independence. Still, there is a strong presence of experts from other Spanish regions in committees and panels. As the approach to higher education is relatively similar in the different Spanish regions, the panel encourages the agency to continue its efforts to ensure the presence of international experts in each review panel. Especially in the case of Master's and PhD programmes which often have a stronger international orientation than undergraduate programmes, the presence of international experts is extremely relevant, both to bring in new ideas and to increase the level of independence in the external quality assurance system.

Although it is stated in the self-assessment report that "it is important to bear in mind that Unibasq faces as well an important challenge to find Basque speaking experts who are not part of the Basque University System, as most of our experts must be from outside our system" all stakeholders the panel met, indicated that the lack of knowledge of the Basque language should only be seen as a limiting factor to involve at least one international expert in each panel in exceptional cases.

The panel commends the agency for its efforts to create structural collaboration with German and French agencies in order to recruit and train international experts. Those efforts will increase the pool of know international experts who can be involved in review procedures. In order to further broaden the pool of potential experts, the agency might consider to review the current approach in which the selection of experts is primarily based on a database with self-nominated experts. Foreign experts who would be interested to join a Unibasq panel are seldom aware of the procedures to self-nominate. A more open search is, therefore, probably useful to systematically involve the most relevant international experts in the agency's review panels.

The panel members interviewed by review panel were positive about the training and guidance they receive from Unibasq. The reasoning behind the new ESG does not seem to have been discussed in detail in those trainings. The panel recommends the agency to include the values and concepts underpinning the 2015 ESG in the training provided to new peer review experts and to provide additional training to experts who are involved with Unibasq for a longer time. One of elements which could clearly receive more attention in the training of experts is the concept of student-centred learning. As indicated above, the concept has not been integrated explicitly in the evaluation schemes, but most procedures allow to tackle the topic during reviews. Training experts to do so

might be the fastest and easiest way to integrate this in the work of the agency in anticipation of the review of the agency's evaluation frameworks.

Panel commendations

- The panel commends the agency for its efforts to create structural collaboration with German and French agencies in order to recruit and train international experts.

Panel recommendations

- The panel recommends that the agency integrates the values and concepts underpinning the 2015 ESG, with special attention for student-centred learning more explicitly in the training of reviewers and experts.
- The panel recommends that the agency pursues its efforts to increase the involvement of international experts in the panels.

Panel conclusion: substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

For each evaluation procedure, Unibasq produces a document which sets out the procedure and criteria to be used. These documents are published on the agency's webpage.

In order to ensure that the aforementioned procedures and criteria are applied in a coherent way, the following mechanisms are used:

- Documents for the orientation and guidance of the experts in the performance of their functions. Currently most evaluations are made through one of Unibasq's on-line platforms.
- Clear procedure for the selection of experts, guaranteeing that the experts meet the required profiles.
- Training sessions for the experts prior to each evaluation process. These sessions provide training on the procedure to be performed, the items to evaluate and the criteria to apply.
- Analysis and review of experts' conclusions and decisions by the Evaluation Committee, which issues the evaluation report as a joint document.
- Comparison of the evaluations made by different experts, in order to check that the evaluation criteria are being applied consistently. In case of divergence, the President of the Committee takes the necessary action to resolve the inconsistency.
- Assistance of the evaluation team by agency staff during the whole process, in order to guarantee that the evaluation process fits the established criteria and procedure.

Analysis

During the site visit, the review panel was able to confirm that the criteria and protocols are public and easily accessible to all stakeholders. The agency organises individual and group contacts with the higher education institutions before an evaluation starts. The views expressed in the various meetings indicated a positive disposition towards the consistency and fairness of the different review processes.

The agency's Evaluation Committees have an important role in guaranteeing the consistent application of review procedures. At programme level five domain committees are responsible for the revision of each report produced within their study area in order to increase consistency between those reports. Although there is no formal process in order to guarantee the consistency of outcomes between the different study areas, the chair persons of the different committees have regular contact in order to discuss the consistency between the activities of their committees. Based on its discussions with different stakeholders, the panel is convinced that this approach guarantees a high level of consistency without creating unnecessary bureaucracy. The AUDIT and DOCENTIA programmes each have one committee, consisting of experts who have often experience with the same programme in other agencies. Thanks to this experience they can contribute to the consistency with the work of other regional agencies.

Panel conclusion: fully compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

The 2014 ENQA review recommendation on 2005 standard 2.5 and 3.7:

- Unibasq should integrate the key findings leading to conclusions more explicitly in its reports.
- Unibasq should clarify the procedures for comments on the preliminary reports and establish formal appeal procedures.
- Unibasq should consider to broaden the intended readership of its reports.

Evidence

The evaluation reports are prepared by the review panels and finalised by the different Evaluation Committees. The structure of the reports follows the guides, templates, protocols and criteria established in advance. In general, the reports are structured with an introduction (objectives of the report and description and analysis of the activities performed) followed by the main part containing the conclusions, commendations and recommendations for enhancement.

The evaluation reports are always issued as common documents (on the basis of a consensus between all members of the competent Evaluation Committee) and must provide clear justifications for their conclusions; these must be phrased in constructive terms, explaining how the possible weak points may be improved.

The agency ensures that all review reports are accessible to the academic community, external collaborators and other stakeholders. All review reports regarding implemented study programmes and institutions are published online (on Unibasq's webpage under the section showing specific procedures' results, i.e. ex-post accreditation and AUDIT procedures, on the Observatory of the Activities of the Basque University System section under the specific study programme name and will be on the DEQAR database).

The only reports that are not published are the ex-ante accreditation reports on programmes that have not been successful and which therefore will not be delivered.

Analysis

The previous ENQA coordinated review signalled a need to integrate the key findings leading to conclusions more explicitly in its reports. The current review panel has analysed several examples of the reports published by the agency and has found that in general, those were competently written. It has been able to confirm that Unibasq has recently changed its ex-post accreditation reports. The agency also presented concrete plans to improve the quality of the AUDIT reports. Other types of reports still need to be improved in the future. The panel analysed the reports of the different evaluation schemes and comes to the following conclusions:

- Reports on ex-post accreditation procedures were the first to be changed. Since 2017, the reports not only contain good practices and suggestions for improvement, but also the detailed evaluation of the Evaluation Committee per evaluation criterion. Until recently, only the report of the Evaluation Committee were published. Those reports are based on the panel reports, which were not published. In order to fully comply with the ESG for this evaluation scheme, the agency decided to also publish the detailed panel reports. This step increases transparency, but it does not improve the readability of the reports as the Evaluation Committee and the Panel report have the same structure and largely the same content. This requires from the reader an analysis of the differences between the two reports. Therefore, the panel encourages the agency to continue to search for a better way to combine the publication of all review reports and the readability of those reports.
- Reports on ex-ante accreditation consist of a description of the procedure and an overall judgement, sometimes complemented with some recommendations for improvement. Those reports do not provide the readership with any justification of the overall judgement.
- Reports on follow-up procedures include a short description of the legal framework and a detailed overview of the judgements per evaluation criterion, an overall judgement and recommendations for improvement.
- Report on modifications provide an overall assessment and justification per evaluation criterion.
- The agency announced during the site visit that AUDIT certification reports on the ongoing reviews will be adapted and will include both the panel and the Evaluation Committee reports. As indicated concerning the ex-post accreditation reports, the panel encourages the agency to search for a better way to combine the publication of all review reports and the readability of those reports.
- DOCENTIA reports include detailed feedback, as well as best practices and recommendations for improvement.

Before the final report is issued, the institution has always a chance to point out factual errors. The Evaluation Committee is responsible to process those comments and then issue the final report. As indicated under ESG 2.7, appeals procedures are in place after the publication of the final report.

Although the agency has improved the quality of its reports, it still struggles with the intended readership of its reports. The reports remain quite technical in nature and are, therefore, first of all useful for the higher education institutions under review. The agency nevertheless has the ambition to provide (potential) students and the broader society with insights in the quality of the higher education which is offered in the Basque Country. In order to contribute to this aim, the agency has created the Observatory of the Activities of the Basque University System. Although the panel values the efforts to bring together data on all programmes offered in the Basque Country, it considers the current information which is available on this platform rather as raw data which are difficult to interpret for students or other interested individuals. The panel, therefore, recommends that

Unibasq offers all available information in a more integrated way, making both quantitative and qualitative data more easily accessible and comparable for all stakeholders. It might be relevant to seek feedback from students, employers and other potential users of the information on their needs and to what extent the current structure fulfils those needs.

The panel learned that, although the information on the Observatory may not be easily understandable for the broader public, the mere existence of the platform provides visibility for the agency's work.

Taking into account the international ambition of the agency, the agency may consider whether it would be relevant, e.g., to provide always a summary report in English or to perform full assessment procedures in English, especially in the case of PhD-programmes in which the international orientation is often very strong.

Panel recommendations

- The panel recommends the agency to further research ways to offer the available information in a more integrated way, making both quantitative and qualitative data easily accessible and comparable for all stakeholders, including students and employers.

Panel conclusion: substantially 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.

The 2014 ENQA review recommendation on ENQA Criterion 8:

- Unibasq should establish formal appeal procedures.

Evidence

The appeals procedure which is applicable depends on the body which is responsible for the final decision. When the formal decision belongs to the University Council (ex-ante and ex-post accreditation and modification procedures), the appeals procedure of the University Council applies. In case of a negative decision of the University Council, the higher education institution may file an appeal. If the appeal is accepted by the Council of Universities, it will ask Unibasq to review its decision. Within Unibasq, the request will be sent to the Presidents of the Study programmes Evaluation Committees who will examine the appeal. If the outcome remains negative, the higher education institution has the option to appeal the decision in Court, in accordance with the Spanish Act 29/1998 on Contentious-Administrative Jurisdiction.

If there is no formal decision by the University Council, as in the case of AUDIT procedure, or in the case of a negative decision by Unibasq, the higher education institution may appeal to Unibasq's Ethics and Guarantees Committee. To improve the appeals procedure, the former Ethics Committee became the Ethics and Guarantees Committee in 2016, following the recommendations made by ENQA and EQAR after the 2014 review process. Henceforward, the Ethics and Guarantees Committee is the body responsible for ensuring compliance with Unibasq's Code of Ethics and Guarantees. Specifically, its duty is:

- 1) To supervise the correct implementation, interpretation and application of the Code.

- 2) To evaluate and decide on observations or objections regarding the appointed Evaluation Committees' members.
- 3) To conduct periodic reviews of the implementation of both the Code and the Committee's Regulations.
- 4) To decide on appeals against certification and accreditation decisions, or evaluation reports issued by Unibasq that are based on a formal defect that damages any guarantees established in favour of the person or institution evaluated, or on a lack of impartiality by any person who intervened in the process. If the Committee decides to review the appeal, the consequence will be the declaration of nullity of the initial decision and the repetition of the appealed certification, accreditation or evaluation report. The procedure and grounds appeals are set out in Article 6 of the Regulations of the Ethics and Guarantees Committee referred to in Article 21 of the Code.
- 5) To report on the claims submitted for breach of the Code, which are based on any other reason than the ones specified in the previous paragraph.

Therefore, in the event of any discrepancy, the university may appeal to the agency. The Committee of Ethics and Guarantees will review the appeals made and take a decision. If the Committee finds a formal defect that damages any guarantees established in favour of the institution evaluated or in the case of the lack of impartiality by any person who intervened in the process, the consequence will be the declaration of nullity of the decision and the repetition of the appealed certification, accreditation or evaluation report.

As stated in Article 3 of the internal regulation of the Ethics and Guarantees Committee, the Committee is composed as follows:

- a) The Director of the Agency or person to whom he/she delegates.
- b) One representative of the staff of the Agency, elected from among its members.
- c) A person who is a member of the Advisory Committee of Unibasq, elected from among its members.
- d) An expert in ethics appointed by the Governing Board of Unibasq, at the proposal of any of its members.
- e) One student outside the Basque University System, to be appointed by the Students Advisory Committee of Unibasq.

In addition to the above procedures for claims and appeals, Unibasq has a more general procedure for the reception and handling of complaints and suggestions. Any individual or institution may make a complaint or suggestion either via the online contact form available on Unibasq's webpage or via e-mail.

Analysis

The review panel confirms that the agency has developed clear complaints and appeals processes. In each handbook, the appeals procedure is mentioned. Although no formal complaints have been filed on ESG-related activities, yet, it is important for a quality assurance agency to offer institutions the opportunity to appeal in case they consider this to be relevant.

The Ethics and Guarantees Committee is composed of members who play an active role within the agency, except for the student member. For an Ethics Committee it is relevant to have a strong link between the management and bodies of the agency and the committee. Although the panel does not doubt the expertise, nor the professional integrity and approach of the members of the Ethics and Guarantees Committee, the panel considers that the composition of the Committee is not adequate in order to play its role as independent appeals committee. The involvement of the Deputy

Director as chairperson and other members who play an active role within the agency might create a perception of a lack of independence. The panel, therefore, recommends to split the Ethics and the Appeals Committee into two separate committees, with an adapted composition of the Appeals Committee.

Overall, stakeholders indicate they appreciate the way the agency takes into account their feedback. Due to the small higher education system and the frequent contact between all stakeholders, this feedback is easily gathered, both in formal fora and through informal contacts. The good interaction seems to some extent prevent institutions from submitting formal complaints.

Panel recommendations

- The panel recommends that the agency splits the Ethics and Guarantees Committee and make sure the Appeals Committee is composed of members who are independent from the agency and the Basque higher education system.

Panel conclusion: substantially compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

- The panel commends the agency's structural cooperation with Euskalit and the Novia Salcedo Foundation.
- The panel commends the management and the team for the efficient and effective use of the resources the Government provides.
- The panel commends the agency for the resources it has mobilized to play an active role in the international quality assurance community.
- The panel commends the agency for this label which has already increased the visibility of dual learning and which has encouraged study programmes to develop dual learning paths.
- The panel commends the agency for its efforts to create structural collaboration with German and French agencies in order to recruit and train international experts.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

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

The ESGs where full compliance have been achieved are:

- Part 3 – 3.2, 3.3, 3.6 and 3.7.
- Part 2 – 2.3 and 2.5.

The ESGs where substantial compliance have been achieved are:

- Part 3 – 3.1, 3.4 and 3.5.
- Part 2 – 2.1, 2.2, 2.4, 2.6 and 2.7

and the agency is recommended to take appropriate action, so far as it is empowered to do so, to achieve full compliance with these standards at the earliest opportunity.

In order to further optimize its work as a quality assurance, the panel would like to make some general and more detailed suggestions, which have already been signalled in the previous sections (in order of appearance):

- The panel recommends the agency to clearly distinguish its ESG-based evaluation procedures and its consultancy activities.
- The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its strategy and daily work, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform (potential) students, the regional Government and society at large, and to serve as input for further quality improvement within the higher education system.
- The panel recommends the agency to continue to search for ways to diversify its incomes.
- The panel recommends to ensure that enough resources are available to extend its work on thematic analysis.
- The panel recommends the agency integrates the concept of student-centred learning as a core element in the agency's work and in its procedures (ESG 1.3).
- The panel recommends the agency to further develop its quality assurance procedures in order to further increase the fitness for purpose of the whole external quality assurance system, aiming for better balance between qualitative and quantitative approaches.

- The panel recommends to involve the Advisory Board more often at a strategic level in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.
- The panel recommends that the agency integrates the values and concepts underpinning the 2015 ESG, with special attention for student-centred learning more explicitly in the training of reviewers and experts.
- The panel recommends that the agency pursues its efforts to increase the involvement of international experts in the panels.
- The panel recommends the agency to further research ways to offer the available information in a more integrated way, making both quantitative and qualitative data easily accessible and comparable for all stakeholders, including students and employers.
- The panel recommends that the agency splits the Ethics and Guarantees Committee and make sure the Appeals Committee is composed of members who are independent from the agency and the Basque higher education system.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

28.10.2018		
TIMING	TOPIC	PERSONS FOR INTERVIEW
17:30-20:30	Review panel's kick-off meeting and preparations for day I	
21:00	Dinner	
29.10.2018		
9:00-9:15	Review panel's private meeting	
9:15-10:30	Meeting with the CEO	<ul style="list-style-type: none"> - Eva Ferreira – Director - Aitor Zurimendi – Deputy Director
10:30-10:45	Break	
10:45-11:30	Meeting with members of the Governing Board	<ul style="list-style-type: none"> - Nekane Balluerka (UPV/EHU) - Rector - Guy Haug – International QA expert
11:30-12:00	Break	
12:00-13:00	Meeting with the team responsible for preparation of the self-assessment report	<ul style="list-style-type: none"> - Eva Fernández de Labastida (Unibasq – Internationalisation and Projects manager) - Naiara Martinez (Economy and Finance Manager - Unibasq) - Guy Haug (Governing Board – Unibasq) - Endika Bengoetxea (Advisory Board – Unibasq)
13:00-13:15	Call with the member of the team responsible for preparation of the self-assessment report	<ul style="list-style-type: none"> - Ronny Heintze (AQAS)
13:15-14:00	Meeting with heads of some reviewed HEIs/HEI representatives	<ul style="list-style-type: none"> - Bixente Atxa (Mondragon Unibertsitatea) – Rector - José María Guibert (Universidad de Deusto) – Rector - Elena Auzmendi – Vicerrector Universidad de Deusto - Gloria Zaballa – Quality Director Universidad de Deusto
14:00-15:00	Lunch	
15:00-15:45	Meeting with Consultative Students Body	<ul style="list-style-type: none"> - Deiene Artigagoitia - Uxue Arostegui (via Skype)
15:45-16:00	Review panel's private discussion	
16:00-17:00	Meeting with representatives from the reviewers' pool for programme reviews	<ul style="list-style-type: none"> - Laureano González Vega (academic) – Former chair of Evaluation Committee - Inmaculada Ortiz (academic) – Former member of Evaluation Committee - Itziar Alkorta (academic) - Andrea Ballesteros (student) - Itziar Etxeandia (professional)
17:00-17:15	Review panel's private discussion	
17:15-17:45	Meeting with representatives of Ethics and Guarantees committee	<ul style="list-style-type: none"> - Cesar Arrese-Igor (former member of Unibasq Advisory Board) - Tamara Cantabrana (Unibasq)
18:00-18:30	Meeting with quality assurance officers of HEIs	<ul style="list-style-type: none"> - Alfonso Davalillo – institutional and quality service director – UPV/EHU
18:30-20:30	Wrap-up meeting among panel members and preparations for day II	

20:30	Dinner (panel only)	
30.10.2018		
9:00-9:30	Review panel private meeting	
9:30-10:15	Meeting with stakeholders, such as employer representatives, local community...	<ul style="list-style-type: none"> - Ana Diaz, Fundación Novia Salcedo - María López de San Vicente, Euskalit
10:15-10:30	Review panel's private discussion	
10:30-11:30	Meeting with quality assurance officers of HEIs	<ul style="list-style-type: none"> - Jon Altuna (Vicerrector Mondragon Unibertsitatea)
11:30-12:00	Review panel's private discussion	
13:00-14:00	Meeting with representatives from the reviewers' pool for institutional reviews	<ul style="list-style-type: none"> - José Joaquín Mira (academic) AUDIT - Committee - Mari Carmen Navarro (professional – Universidad de Sevilla) - Jorge Moreno (student – Mainz University) - Eduardo Jiménez (academic) – DOCENTIA Committee - MariPaz Alvarez (profesional –Universidad Autónoma de Barcelona) AUDIT Committeee
14:00-15:00	Lunch	
15:00-16:00	Meeting with key staff of the agency/staff in charge of evaluations	<ul style="list-style-type: none"> - Idoia Collado (Study programmes - DOCENTIA) - Estibaliz Etxebarria (Study programmes) - Eva Fernández de Labastida (AUDIT)
16:00-16:15	Review panel's private discussion	
16:15-17:00	Meeting with representatives of internal committees for Quality, Equality and for the promotion of the use of the Basque language	<ul style="list-style-type: none"> - Maitane Monsalvo (Equality) - Carla Beltran de Guevara (Basque) - Aitor Zurimendi (Quality)
17:00-17:15	Break	
17:15-18:00	Meeting with the Advisory Board	<ul style="list-style-type: none"> - Manuel de León (academic) - Diego Sanchez (student) - Ruth Zimmerling (academic) (via Skype)
19:00-20:45	Wrap-up meeting among panel members: preparation for day III and provisional conclusions	
31.10.2018		
9:15-9:45	Review panel private meeting	
9:45-10:45	Meeting with ministry representatives	<ul style="list-style-type: none"> - Adolfo Morais (Viceminister for Universities of the Basque Government)
10:45-11:30	Meeting among panel members to agree on final issues to clarify	
11:30-12:30	Meeting with CEO to clarify any pending issues	<ul style="list-style-type: none"> - Eva Ferreira – Director - Aitor Zurimendi – Deputy Director
12:30-13:15	Private meeting among panel members to agree on the main findings	
13:15-13:45	Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings	
13:45-14:30	Lunch (panel only)	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

1. Background and Context

The Agency for Quality of the Basque University System (Unibasq – Agencia de Calidad del Sistema Universitario Vasco/Euskal Unibertsitate Sistemaren Kalitate Agentzia) is a state owned body governed by private law attached to the Basque Government's department responsible for universities, dedicated to promote the innovation and improvement in the Basque University System (University of the Basque Country (UPV/EHU), Deusto University and Mondragon University), satisfying international quality standards and attending the society interest in higher education.

The object of the agency is the evaluation, accreditation and certification of quality in the Basque University System, taking into consideration its Spanish, European and international dimensions. The agency may also carry out evaluation, accreditation and certification activities at universities and higher education institutions outside the Basque Autonomous Community within the context of the European Higher Education Area, on the basis of prior agreements signed with other agencies, universities or educational authorities outside the Basque Autonomous Community.

The evaluation, accreditation and certification procedures of the agency must be oriented towards their permanent adaptation to social demand, the permanent need for quality at universities and the continuous improvement of higher education.

The agency acts independently and objectively in the performance of its evaluation, accreditation and certification activities. The evaluation committees act fully independently and the result of their assessments cannot be changed by any other body of the agency.

The standards and procedures used, which are established and published by the agency, must be objective and in line with those used internationally.

The agency performs the following functions in order to achieve its purpose in accordance with the competencies entrusted to it by the legislation in force, while at the same time respecting the competencies of the Basque Government and of other evaluation agencies as well as the autonomy of universities:

- a) Evaluation and accreditation of teaching and research staff.
- b) Evaluation of study programmes at universities.
- c) Evaluation of individual research merits of academic staff for the purpose of allocating to them additional remuneration, accrediting them in accordance with the competencies attributed to the agency by law, and assessing the achievement of the research objectives set by the Basque Government.
- d) Institutional evaluation and certification.
- e) Advice on matters regarding the quality of the Basque university system.
- f) Any other matter related to the agency's purpose and area of activity that may be entrusted to it by the governmental department responsible for universities.

In order to fulfil these functions, the agency signed its first multi-annual programme contract in 2016, in line with its strategic plan 2016-2019, with the department responsible for universities of the Basque Government, in which its funding linked to the fulfilment of certain objectives was established. The

agency must provide information on an annual basis about the expenditure incurred and the extent of fulfilment of the aforementioned objectives.

Regarding the international dimension, in addition of being part of ENQA and listed in EQAR, Unibasq is member of INQAAHE and ECA.

Unibasq has been a member of ENQA since 15 September 2014 and is reapplying for renewal of membership.

Unibasq has been registered on EQAR since 29 November 2014 and is applying for renewal of the registration.

2. Purpose and Scope of the Evaluation

This review will evaluate the way in which and to what extent Unibasq fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of Unibasq should be reconfirmed and to EQAR to support Unibasq application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of Unibasq within the scope of the ESG

In order for Unibasq to apply for ENQA membership and for registration in EQAR, this review will analyse all Unibasq activities that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of Unibasq have to be addressed in the external review:

- Programme ex-ante accreditation and authorisation in the Basque University System;
- Follow-up of the study programmes of the Basque University System;
- Review of the study programmes modifications;
- Accreditation renewal of study programmes;
- Audits (IQAS audits);
- Docentia.

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by Unibasq including the preparation of a self-assessment report;
- A site visit by the review panel to Unibasq;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;

- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews 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. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide Unibasq with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards Unibasq review.

3.2 Self-assessment by Unibasq, including the preparation of a self-assessment report

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which Unibasq fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case 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 reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

Unibasq will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to Unibasq at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by Unibasq in arriving in Vitoria-Gasteiz, Spain.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to Unibasq within 11 weeks of the site visit for comment on factual accuracy. If Unibasq chooses to provide a 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 Unibasq, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

Unibasq is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which Unibasq expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

Unibasq will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. Unibasq commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by Unibasq. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency

with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether Unibasq has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to Unibasq and ENQA and until it is approved by the Board the report may not be used or relied upon by Unibasq, the panel and any third party and may not be disclosed without the prior written consent of ENQA. Unibasq may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

Unibasq shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, Unibasq will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to Unibasq if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	October/November 2017
Appointment of review panel members	June/July 2018
Self-assessment completed	By August 2018
Pre-screening of SAR by ENQA coordinator	August 2018
Preparation of site visit schedule and indicative timetable	September 2018
Briefing of review panel members	October 2018
Review panel site visit	Early November 2018
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	By January 2019
Draft of evaluation report to Unibasq	January 2019
Statement of Unibasq to review panel if necessary	February 2019
Submission of final report to ENQA	March 2019
Consideration of the report by ENQA Board and response of Unibasq	April 2019
Publication of the report	April 2019

ANNEX 3: GLOSSARY

ACSUG	Axencia para a Calidade do Sistema Universitario de Galicia – Agency for Quality Assurance in the Galician University System
ANECA	Agencia Nacional de Evaluación de la Calidad y Acreditación – National Agency for Quality Assessment and Accreditation of Spain
AQAS	Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen
AQU Catalunya	Agència per a la Qualitat del Sistema Universitari de Catalunya - Catalan University Quality Assurance Agency
ECA	European Consortium for Accreditation
ECTS	European Credit Transfer System
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education.
ESG	European Standards and Guidelines (for Quality Assurance in the European Higher Education Area)
IQAS	Internal Quality Assurance System
LOU	Ley Orgánica de Universidades - Spanish Framework Law Governing Universities
LOMLOU	Ley Orgánica de Modificación de la Ley Orgánica de Universidades - Spanish Framework modifying the Law Governing Universities
REACU	Red Española de Agencias de Calidad Universitaria – Spanish Network of Quality Assurance Agencies in Higher Education
RUCT	Registro de Universidades, Centros y Títulos - Register of Universities, Centres and Degrees
UPV/EHU	Universidad del País Vasco / Euskal Herriko Unibertsitatea - University of the Basque Country

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY UNIBASQ BEFORE THE SITE VISIT

- Self-Assessment Report 2018
- Strategic Plan 2016-2019
- Unibasq Act
- Procedure for expert selection
- Quality Policy
- Unibasq Quality Handbook
- Unibasq's web platform - www.unibasq.eus

ADDITIONAL DOCUMENTS PROVIDED BY UNIBASQ DURING THE SITE VISIT ON REQUEST OF THE REVIEW PANEL

- Internal regulation of the Ethics and Guarantees Committee [https://www.unibasq.eus/wp-content/uploads/2017/11/Reglamento Comit de tica 6-5-2016 ENG.pdf](https://www.unibasq.eus/wp-content/uploads/2017/11/Reglamento_Comit_de_tica_6-5-2016_ENG.pdf)
- Recent ex-post accreditation reports <https://www.unibasq.eus/es/titulos-renovacion-acreditacion/informes-upv-ehu/>
- Site visit schedule - www.unibasq.eus/wp-content/uploads/2017/10/Anexo-III-Agenda-Panel-FR-115.pdf
- Annual report of the Ethics and Guarantees Committee 2017 https://www.unibasq.eus/wp-content/uploads/2018/10/Memoria-CEG-2017_-2.pdf
- Unibasq budget <http://www.euskadi.eus/k28aVisWar/k28aldeES.jsp>
- Unibasq audit report [http://www.euskadi.eus/contenidos/informacion/cuentas_anuales_ee_sspp/es_spe_cae/aduntos/2017/36 UNIBASQ.pdf](http://www.euskadi.eus/contenidos/informacion/cuentas_anuales_ee_sspp/es_spe_cae/aduntos/2017/36_UNIBASQ.pdf)
- Novia Salcedo report on employability <https://www.unibasq.eus/wp-content/uploads/2018/04/Informe-de-Empleabilidad-NSF.pdf>
- Protocol for the appointment of students
- Example of a site visit schedule



THIS REPORT presents findings of the ENQA Agency Review of the Agency for the Quality of the Basque University System (Unibasq), undertaken in 2018.



2018 ENQA AGENCY REVIEW

Unibasq's comments regarding the external review panel report

14 January 2019

This is the second time that Unibasq - the Agency for the Quality of the Basque University System undergoes a process involving the external assessment of its activities, in this case, in accordance with the ESG 2015.

We would like to thank the panel for their in-depth review and the commendations and recommendations made. Apart from a few factual inaccuracies that are marked in the pdf file sent attached, we would like to make several specific remarks on some of the panel's findings and recommendations. The report is complete and adds value to the self-evaluation report, showing Unibasq the way towards further improvement.

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Panel conclusion: substantially compliant

Panel recommendations

1. *The panel recommends the agency to clearly distinguish its ESG-based evaluation procedures and its consultancy activities.*

In view of the comment in pages 20-21, Unibasq does not understand this recommendation: *"Finally, the panel has noticed in its discussions with several stakeholders that a clear conceptual distinction between ESG-based evaluation and consultancy activities is lacking within Unibasq. The ex-ante evaluation of 'títulos propios' at the UPV/EHU may be considered as consultancy. This type of activity may allow the agency to diversify its activities and capitalize on its expertise. Although the panel did not find any problematic interference between evaluation and consultancy activities, it recommends the agency to clearly distinguish those activities and thus prevent any potential conflict of interest."* If there is no problematic interference, why the recommendation? In fact, the difference is clear for our institutions as our ESG-based evaluation activities lead to a binding report for any accreditation or certification decision, while our consultancy activities lead to a report which someone else (institution or government) might take into account for their own decision-making processes.

ESG 3.4 THEMATIC ANALYSIS

Panel conclusion: substantially compliant

Panel recommendations

2. *The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its strategy and daily work, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform (potential)*

students, the regional Government and society at large, and to serve as input for further quality improvement within the higher education system.

3. *The panel recommends to ensure that enough resources are available to extend its work on thematic analysis.*

The agency will continue with its efforts regarding the development of thematic analysis in the Basque University System. It will be one of the main topics in the new strategic plan which is due by the end of 2019 beginning of 2020 and will be also part of the new programme-contract with the Basque Government.

ESG 3.5 RESOURCES

Panel conclusion: substantially compliant

Panel recommendations

4. *The panel recommends the agency to continue to search for ways to diversify its incomes.*

As stated in the SER, Unibasq is a public entity and its main income comes from the Basque Government, in the last years through a programme-contract. Even if the agency can have a small amount of income coming from some other sources (fees, international projects...), the diversification options are limited, as well as the extra funding, since Unibasq is a non-profit organization and have to reimburse the surplus money to the Basque Government. That is why, even if Unibasq could take the recommendation as a suggestion, it seems that it has a huge impact in the conclusion of the panel regarding the compliance with this standard, regardless of the resources available.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Panel conclusion: substantially compliant

Panel recommendations

5. *The panel recommends the agency integrates the concept of student-centred learning as a core element in the agency's work and in its procedures (ESG 1.3).*

As already mentioned in the SER and during the interviews, the concept of student-centred learning is implicit in all the programme reviews, even if the specific term is not explicit in all the documents *"In the ex-ante evaluation of Bachelor's and Master's degrees, these aspects are reviewed as part of the criteria dealing with the planning of teaching activities and their expected outcomes. In the ex-ante evaluation of Doctoral programmes, they are reviewed when assessing the educational activities, the programme organisation and achievement of the expected learning outcomes. In the follow-up and accreditation procedures, they are part of the review of delivery and performance indicators, and achievement of*

learning outcomes (respectively). As the case of AUDIT, this aspect is reviewed when assessing how the centre provides student-centred study programmes. In the case of DOCENTIA, it is part of the planning of teaching activities and their expected outcomes.”

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Panel conclusion: substantially compliant

6. *The panel recommends the agency to further develop its quality assurance procedures in order to further increase the fitness for purpose of the whole external quality assurance system, aiming for better balance between qualitative and quantitative approaches.*

Even if from an external point of view there might be a perception of a strong quantitative approach, since a set of indicators are used to monitor the delivery of the programmes and the IQAS of the schools and faculties are process-based and they have mechanisms to assure the quality of these same programmes and the activities they performed; a qualitative approach is used through Unibasq’s external review activities, mainly during the interviews with the different stakeholders and taking into account the reflections they made in their self-evaluation reports.

7. *The panel recommends to involve the Advisory Board more often at a strategic level in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.*

During the development of Unibasq’s strategy, all the agency’s bodies are consulted to take into account their views regarding the development of the external quality assurance framework in the Basque Country. This includes our Advisory Board, which apart from fine-tuning all the review procedures and approving the evaluation criteria, assesses all the review activities done by the agency and propose actions to further improve them. The Advisory Board will have a relevant role in the development of the new strategic plan 2020-2023.

ESG 2.4 PEER-REVIEW EXPERTS

Panel conclusion: substantially compliant

Panel recommendations

8. *The panel recommends that the agency integrates the values and concepts underpinning the 2015 ESG, with special attention for student-centred learning more explicitly in the training of reviewers and experts.*

In each training session the connections among our evaluation criteria and the ESG 2015 are explained. Nevertheless and in order to further improve our trainings we will highlight the changes made and make more explicit remarks to student-centred learning.

- 9. The panel recommends that the agency pursues its efforts to increase the involvement of international experts in the panels.*

As commented in the SER and during the interviews, we will continue with our international collaborations to train more international experts who will be part of our committees or panels for the new institutional accreditation procedure.

ESG 2.6 REPORTING

Panel conclusion: substantially compliant

Panel recommendations

- 10. The panel recommends the agency to further research ways to offer the available information in a more integrated way, making both quantitative and qualitative data easily accessible and comparable for all stakeholders, including students and employers.*

Unibasq publishes on its webpage the review reports under the specific procedure area, so all the information regarding the specific procedure (legal framework, standards and guidelines, evaluation committees, etc.) and its objectives are clear. In addition, since the creation of the Observatory of the Basque University System activity (<https://observatorio.unibasq.eus/en/bachelor-degrees/>) each degree has a specific area where all the related indicators and its different review reports can be reached. This way, quantitative (indicators) and qualitative (review reports with recommendations and good practices) data are easily available for all kind of stakeholders.

ESG 2.7 COMPLAINTS AND APPEALS

Panel conclusion: substantially compliant

Panel recommendations

- 11. The panel recommends that the agency splits the Ethics and Guarantees Committee and make sure the Appeals Committee is composed of members who are independent from the agency and the Basque higher education system.*

Unibasq was already thinking on changing the composition of the Ethics and Guarantees Committee in order to become more independent from the agency and the Basque Higher education system, but still thinks that having just one body could be enough. The staff from the agency will have just a

methodological and supportive role and no member of the agency's direction will be part of the Committee.

Brussels, 15 April 2019

Application by Unibasq for renewal of registration on EQAR

Dear Ms Ferreira,

The Register Committee has considered your application of 05/01/2018 for renewal of inclusion on the European Quality Assurance Register (EQAR) and the external review report of 05/03/2019, which analyses Unibasq's compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

The Committee was unable to take a decision on Unibasq's application as yet and kindly requests Unibasq to provide additional clarification on the matters described in the following.

A. Background

1. Evaluation of “títulos propios”

In its decision of 29/11/2014, the Register Committee clearly stated that (initial) evaluations of “títulos propios” study programmes offered by Universidad del País Vasco / Euskal Herriko Unibertsitatea (UPV/EHU) are considered as external quality assurance activities within the scope of the ESG.

Unibasq never contested this classification and these evaluations have been listed on the official EQAR Register entry as quality assurance activity within the scope of the ESG ever since.

In its application of 05/01/2018, Unibasq did not mention the evaluations of “títulos propios”. This led EQAR to believe that the activity had been discontinued.

In its 2018 self-evaluation report, Unibasq described these evaluations under the heading “Other evaluation activities”.

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The external review report of 05/03/2019 described these reviews under the heading “Consulting activities” and noted that “Unibasq has a consultancy agreement with the UPV/EHU to provide a report on all new study programmes of this type” and that this report “serves as input for the internal policy making of the UPV/EHU” (p. 16).

Nature of “títulos propios” evaluations

The current panel described that “the evaluation consists of a report based on the university’s internally defined evaluation criteria. It is a desk-based review that looks into four dimensions: training programme (academic planning, if applicable, internships and review systems); academic staff (adequacy of the academic commission and the teaching staff); students (access requirements, support systems and their participation in the improvement of the programme); and management (funding, administration staff and infrastructures and resources)” (p. 16).

The Register Committee therefore considered that the activity matches all four characteristics described in the [EQAR Policy on the Use and Interpretation of the ESG](#) (section 4, page 3).

In general, the Register Committee has held that activities are within the scope of the ESG irrespective of whether they are based on an agency’s own frameworks or carried out as contractor using a third-party framework, such as UPV/EHU’s own evaluation criteria in this case.

Only if Unibasq acted solely as a subcontractor to UPV/EHU and had no own responsibility whatsoever for the review process or outcomes in the public eye (i.e. it is not brought in connection with the evaluations), the classification as capacity building service and outside of the scope of the ESG might be accurate.

If Unibasq was associated with the evaluations or the resulting reports, the Register Committee would consider the activity as an external quality assurance activity within the scope of the ESG.

Presentation and distinction in public

The external review panel reported in its analysis of Unibasq’s compliance with ESG 3.1 that it had “noticed in its discussions with several stakeholders that a clear conceptual distinction between ESG-based evaluation and consultancy activities is lacking within Unibasq. The ex-ante evaluation of ‘títulos propios’ at the UPV/EHU may be considered as consultancy. This type of activity may allow the agency to diversify its activities and capitalize on its expertise. Although the panel did not find any problematic interference between evaluation and consultancy activities, it recommends the agency to implement the relevant Guideline

and, so, clearly distinguish its quality assurance activities and its other activities in its communication and daily work” (p. 19/20).

The Unibasq website (<https://www.unibasq.eus/en/degrees-certificates-and-diplomas-titulos-propios/>) does present the evaluation of “títulos propios” along with Unibasq’s external quality assurance activities for official degrees and does not make a clear distinction that they were an activity of a different nature.

The website states that “the UPV/EHU regulation for certificates and diplomas [... establish] that Unibasq will evaluate and certificate” those diplomas. While the Register Committee acknowledged that the term “evaluation” might at times be used for consultancy-type activities, it considered that using the term “certificate” implies that an activity is external quality assurance in nature, rather than consultancy.

The UPV/EHU catalogues of “títulos propios” (<https://www.ehu.eus/documents/1664504/9275896/Catalogo-Masteres-Propios-2019-2020.pdf/41b26e67-4a75-75bf-3c6d-99b8f8a37879>) appears¹ to state that these diplomas are accredited by Unibasq.

2. International quality assurance

The external review report noted that, at the time of the review, Unibasq was “performing a first international ex-post accreditation procedure for the University of Aconcagua in Chile”.

While noting that the procedure was in general similar to the procedure for ex-post accreditation in the Basque Country, the panel stated that – due to the voluntary nature – “the full responsibility to request any kind of follow-up lies in the hands of the institution” (p. 40).

B. Clarification questions

The issues raised above raise major questions regarding the classification of “títulos propios” evaluations as well as their compliance with the ESG, if relevant, since they are not covered by the external review report. We therefore kindly request that you clarify the following:

1. Regarding “títulos propios”:
 - (a) Please explain why Unibasq did not list the evaluation of “títulos propios” in its application for renewal of registration.
 - (b) Please elaborate on Unibasq’s classification of the evaluation of “títulos propios” in light of the above. In doing so, please

¹Google Translate (<https://translate.google.com/>) was used on the catalogue.

bear in mind the characteristics mentioned in the [EQAR Policy on the Use and Interpretation of the ESG](#) (section 4, page 3).

- (c) If Unibasq maintains that these were consulting activities outside the scope of the ESG, please explain which specific steps Unibasq has taken to prevent that these activities are misrepresented or misconstrued as external quality assurance activities.
- (d) Please provide an overview of how ESG 2.1 – 2.7 are applied in these evaluations. Where these evaluations follow the same processes or criteria as one of Unibasq's activities for official degree programmes you may simply indicate so.

2. Regarding international quality assurance:

- (a) Please elaborate briefly how Unibasq plans to develop further its international evaluation activities after the first procedure.
- (b) Please clarify whether Unibasq's Protocol for international quality assurance contains any provision to require or encourage follow-up, or whether Unibasq takes any other steps to encourage follow-up of international accreditation activities.

We would be obliged if you could clarify these matters **by 21 May 2019** at the latest.

Kind regards,



Karl Dittrich
(President)

European Quality Assurance Register for Higher Education (EQAR)
Mr. Karl Dittrich

- by email -

Vitoria-Gasteiz, 20 May 2019

Re: Application by Unibasq for renewal of registration on EQAR

Dear Mr. Dittrich,

Regarding your additional clarification request related to Unibasq's application for renewal of its registration on EQAR, in the following lines you can find the requested information:

Clarification questions:

1. *Regarding "Títulos propios":*

- a. *Please explain why Unibasq did not list the evaluation of "títulos propios" in its application for renewal of registration.*

Unibasq included the evaluation of the "Títulos propios" in its first review because all the evaluations regarding study programmes were included regardless if they were in line with the ESG, 2005 in that moment, or not.

When applying for the renewal and for the external review coordinated by ENQA, we realized that it was more a consultancy activity than a proper external quality assurance activity as Unibasq just provides an external expert report so the University of the Basque Country (UPV/EHU) can take its decision considering both an internal review and this external report.

- b. *Please elaborate on Unibasq's classification of the evaluation of "títulos propios" in light of the above. In doing so, please bear in mind the characteristics mentioned in the EQAR Policy on the Use and Interpretation of the ESG (section 4, page 3).*

The agreement between the UPV/EHU and Unibasq states that Unibasq will do the external evaluation of the "Títulos propios" proposal. In the internal regulation of the UPV/EHU (<https://www.ehu.eus/es/web/titulospropios/berezko-ikasketen-arautegi-bateratua>), article 19 "Evaluación y acreditación de titulaciones" it is established that the proposal will be reviewed internally and externally and that both evaluations should be positive in order to the proposal to be approved. It mentions the old regulations regarding Unibasq's activities when the

denomination of evaluation and accreditation were used for the review of the “Títulos propios”, “Art. 80 c) de la Ley 3/2004, de 25 de febrero, del Sistema Universitario Vasco que recoge entre las funciones de UNIBASQ la evaluación y la acreditación de la calidad de las enseñanzas conducentes a la obtención de los títulos propios, o por cualquier otra agencia de evaluación acreditada.” When the Act 13/2012 of 28 June 2012 governing Unibasq – the Agency for the Quality of the Basque University System was approved all the sections referring to the activities of Unibasq in the Act 3/2004 of the Basque University System were repealed (Sections 79 to 88 of Act 3/2004 dated 25 February 2004, governing the Basque University System) and no specific reference to the evaluation or accreditation of “Títulos propios” was made in the Act 13/2012 (https://www.unibasq.eus/wp-content/uploads/2017/11/LEY_13_2012_Unibasq-ing-5.pdf). Thus, it seems that the UPV/EHU did not take this into account when updated their own regulations. Moreover, they are publishing part of their “Títulos propios” as accredited by Unibasq which is not true.

The fact is that we find specific academic experts of the knowledge areas of the proposals of the “Títulos propios” and ask them to review the documentation that the university send us considering the criteria set by the university. Once the report is done, Unibasq issues a report that it is used by the university together with their internal evaluation. Unibasq does not take any decision on the proposal and as internal reports, does not publish them.

- c. *If Unibasq maintains that these were consulting activities outside the scope of the ESG, please explain which specific steps Unibasq has taken to prevent that these activities are misrepresented or misconstrued as external quality assurance activities.*

As stated in the previous section, Unibasq acts only as a subcontractor to the UPV/EHU and has no responsibility for the review process or the outcomes, although it seems that there is some kind of misunderstanding regarding this taking into account what is written in the internal regulations of the UPV/EHU (need to update them) and the public information on their website when they stated that some programmes are accredited.

In order to prevent this misunderstanding, Unibasq is going to have specific meetings with the persons in charge of these programmes in the UPV/EHU and ask them to update the information published. In addition, we will update the information on our webpage so all the activities that are not under the scope of the ESG can be easily identified to prevent any future misunderstanding.

Moreover, we will submit a Substantive changes form requesting this activity to be removed from the EQAR.

d. Please provide an overview of how ESG 2.1-2.7 are applied in these evaluations. Where these evaluations follow the same processes or criteria as one of Unibasq's activities for official degree programmes you may simply indicate so.

Standard	"Títulos propios" evaluation
2.1 Consideration of internal quality assurance	<p>1.1 Policy for quality assurance – Not us such, just the way students participate in the improvement of the programme and the general management.</p> <p>1.2 Design and approval of programmes – Proposal of the programme as established in the internal regulation of the UPV/EHU.</p> <p>1.3 Student-centred learning, teaching and assessment – Not us such, some information regarding the training programme and assessment methods.</p> <p>1.4 Student admission, progression, recognition and certification – Access requirements and support systems.</p> <p>1.5 Teaching staff – Adequacy of the academic commission and the teaching staff (CVs).</p> <p>1.6 Learning resources and student support – Support systems and facilities.</p> <p>1.7 Information management - NO</p> <p>1.8 Public information - NO</p> <p>1.9 On-going monitoring and periodic review of programmes –NO, there is no monitoring</p> <p>1.10 Cyclical external quality assurance – the internal regulation says that they will be reviewed every 5 years.</p>
2.2 Designing methodologies fit for purpose	<p>Designed by the university. Desk-based review. The university provides information regarding the proposal including the CVs of the academic staff considering the following dimensions: training programme (academic planning, if applicable, internships and review systems); academic staff (adequacy of the academic commission and the teaching staff); students (access requirements, support systems and their participation in the improvement of the programme); and management (funding, administration staff and infrastructures and resources).</p>

2.3 Implementing processes	There is an equivalent to self-assessment as the application includes the information as established in the dimensions to be assessed, but there is no reflection. The review is desk-based and there is no site visit; Unibasq issues a report that is an input with the internal review made by the UPV/EHU and there is no follow-up on the recommendations, as long as Unibasq is concerned.
2.4 Peer-review experts	Academic experts made the report, no participation of students or professionals.
2.5 Criteria for outcomes	Established by the university following the four dimensions mentioned before.
2.6 Reporting	Reports are not published as they are only an input for the final outcome.
2.7 Complaints and appeals	The final decision is of the university, Unibasq only provides the option to comment on the report for factual mistakes or include further information when needed.

2. Regarding international quality assurance:

- a. Please elaborate briefly how Unibasq plans to develop further its international evaluation activities after the first procedure.

After the first international procedure, there are conversations with the Universidad de Aconcagua Chile to go on with the reviews of some of their programmes. The estimation is continue with the review of more programmes next year, including the follow-up procedure. Our Advisory Board will review the procedure considering the outcomes to see if there is need for some fine-tuning of the criteria or procedure. In addition, there is some interest from some other universities in Latin-America regarding Unibasq external reviews either at programme or institutional level. Nevertheless, the main activity of Unibasq will continue being in the Basque Country.

- b. Please clarify whether Unibasq's Protocol for International quality assurance contains any provision to require or encourage follow-up, or whether Unibasq takes any other steps to encourage follow-up of international accreditation activities.

[Unibasq's Protocol for International quality assurance](#) establishes in its section 4.11 that Unibasq will issue a final accreditation report and that the accreditation decision can be of up to 5 years and that if needed there will be a periodic follow-up of the improvement plan provided by the programme. This can be seen in the first review report made to date:

<https://www.unibasq.eus/wp-content/uploads/2019/05/Informe-UAC.pdf>

Should you need further clarification, do not hesitate to request it.

Best regards,



Eva Ferreira García
Director

European Quality Assurance Register for Higher Education (EQAR)
Mr. Karl Dittrich

- by email -

Vitoria-Gasteiz, 12 September 2019

**Re: Deferral of Application by Unibasq – Agency for Quality of the Basque University System for
Renewal of Inclusion on the Register**

Dear Mr. Dittrich,

Regarding your invitation to make additional representation regarding the deferral of Application by Unibasq – Agency for Quality of the Basque University System for Renewal of Inclusion on EQAR, Unibasq would like to state the following regarding the aspects flagged as non-compliant or partially compliant with the ESG:

Standard	Register Committee Conclusion
3.1	Non-compliance
2.6	Partial compliance
2.7	Partial compliance

ESG 3.1 – Activities, policy and processes for quality assurance

The Deferral of Application document states the following regarding ESG 3.1: “... 32. Having considered Unibasq's response, the Register Committee accepted that the evaluation of “títulos propios” may be classified as consultancy service performed by Unibasq to UPV/EHU.

33. The Register Committee further considered how Unibasq ensured a clear distinction from its external quality assurance activities within the scope of the ESG (see EQAR Policy on the Use and Interpretation of the ESG, standard 3.1 and Annex 5). The Committee noted that such a clear distinction is particularly crucial in this case, given that the terminology and the characteristic of the activity cause an actual risk of confusion with ESG activities.

34. The Register Committee concluded that the current presentation on Unibasq's website is misleading and does not ensure clarity as to the different nature of these evaluations. The Committee therefore urged Unibasq to make a clear distinction without delay. In doing so, Unibasq should ensure that no impression is created whatsoever that Unibasq had any responsibility for these evaluation or that “títulos propios” were accredited, approved, endorsed or in any other way sanctioned by Unibasq.

35. Furthermore, Unibasq should avoid any impression that these evaluations would be within the scope of Unibasq's registration on EQAR or had any relationship with the ESG.

36. Should Unibasq want to lend its quality mark to these evaluations and programmes, it would have to re-classify the evaluations to be within the scope of the ESG.

37. The Register Committee underlined that agencies are also expected to work against misrepresentation by institutions – e.g. through contractual provisions – and at least to act upon clear cases of misrepresentation. The Committee therefore welcomed Unibasq's intention to “have specific meetings with UPV/EHU”, but also noted that Unibasq has not yet taken any specific action to prevent UPV/EHU's misrepresentation of the evaluations.

38. Given the currently insufficient separation between Unibasq's activities within and outside the scope of the ESG, the Register Committee was unable to concur with the panel's conclusion, but concluded that Unibasq does not comply with standard 3.1.”

Unibasq has already held the specific meetings with the UPV/EHU and sent a formal letter regarding this issue (see Annex 1) and the information that was available on the webpage of the university has been corrected and it doesn't state anymore that the “Títulos propios” are accredited by Unibasq. Additionally, a new agreement has been elaborated with the UPV/EHU (see Annex 2) stating the conditions on any information published regarding the review of “Títulos propios”. This new agreement was approved by Unibasq's Governing Council at its meeting of the 15th July 2019 (see Annex 3 – Draft minutes) where the topic was presented and where the presidents of the three universities of the Basque University System have a sit, so they are fully aware of the situation and which evaluations are within the scope of the ESG. It is stated that this is a consultancy activity of Unibasq and that the conditions established are that they cannot publish that these “Títulos propios” are: “Accredited, validated or reviewed by Unibasq” or use any other expression that may be misleading and make the public think that those programmes have been reviewed following the ESG or similar criteria and methodology as the official study programmes.

Moreover, currently there is no information on Unibasq's webpage that can provide misleading information regarding this issue, as the information regarding “Títulos propios” has been deleted from the section relating study programmes review procedures in order to avoid misunderstandings. In addition, we request to remove this activity from the information regarding Unibasq's activities under the scope of the ESG in the EQAR to avoid misleading information. Should there arise a need to submit the corresponding substantive changes form, we invite you to please express so, in order for us to submit it as soon as possible.

ESG 2.6 – Reporting

The Deferral of Application document states the following regarding ESG 2.6: “... 19. The review panel found that Unibasq published all reports, except for the ex-ante accreditation reports on programmes that have not been successful.

20. The Register Committee underlined that all reports should be published as required by the standard.

21. Even though the flag was partially addressed the Register Committee did not concur with the review panel's conclusion of compliance, but concluded that Unibasq still complies only partially with ESG 2.6."

The Register Committee noted that Unibasq publishes all reports except those from ex-ante accreditation that have not been successful. As outlined in the SAR, Unibasq publishes all reports of implemented study programmes. When a programme does not pass the ex-ante accreditation, it cannot be offered by universities, therefore, since it would be confusing for readers to find information on a study programme that will never exist, we do not publish the report.

ESG 2.7 – Complaints and appeals

The Deferral of Application document states the following regarding ESG 2.7: *"... 26. Given the composition of the Ethics and Guarantees Committee limiting its independence the Register Committee was unable to concur with the review panel's conclusion of compliance, but concluded that Unibasq complies only partially with ESG 2.7."*

A new Ethics and Guarantees Code was approved by Unibasq's Governing Council at its meeting of the 15th July 2019 (see Annex 3 – Draft minutes, 4 – Ethics and Guarantees Code and 5 – Internal Regulation). The new code establishes that the Committee is composed of experts from outside the Basque University System, one student appointed by Unibasq Consultative Students Committee and two experts appointed one by the Governing Council and another one by the Advisory Board. In all cases, the members cannot be part of any Unibasq body or committee.

The new members will be appointed in the next meetings of the Advisory Board (27th September 2019) and of the Governing Council (21st October 2019). Unibasq's staff will support the Ethics and Guarantees Committee as technical secretary, but won't have any voting rights.

Should you require any further clarification, do not hesitate to request it.

Best regards,



Eva Ferreira García
Director