

**Approval of the Application
by The Cyprus Agency of Quality Assurance and
Accreditation in Higher Education (CYQAA)
for Inclusion on the Register**

Register Committee
[4-5 November]

Ref. RC25/A73

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Application of:	04/04/2018
Agency registered since:	N/a
External review report of:	21/02/2019
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Bernard Coulie (chair, academic), Ewa Kolanowska (secretary), Sandra Marcos Ortega, Arus Harutyunyan
Decision of:	05/11/2019
Registration until:	29/02/2024
Absented themselves from decision-making:	None.
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 16/04/2018 2. External Review Report, 21/09/2019 3. Applicant's statement on the review report, 12/03/2019 4. Additional Representation, 10/07/2019

1. The application of 04/04/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 16/04/2018.
3. The Register Committee considered the external review report of 21/02/2019 on the compliance of CYQAA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered CYQAA's statement on the review report of 12/03/2019.
5. The Register Committee invited CYQAA to make additional representation on the grounds for possible rejection on 15/04/2019.

The Register Committee considered CYQAA's additional representation, at its meeting on 10/07/2019.

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Analysis:

6. In considering CYQAA's compliance with the ESG, the Register Committee took into account:
 - *Institutional evaluation – accreditation.*
 - *Programme evaluation – accreditation.*
 - *Joint programme evaluation – accreditation*
 - *Evaluation and accreditation of cross-border education, offered by local institutions in member states or third party countries.*
 - *Assessment of the conditions for the provision of cross-border education from foreign institutions in Cyprus.*
 - *Departmental Evaluation-Accreditation.*
 - *Audit.**
7. *According to the review report the panel was unable to assess ESG compliance of *audit* procedures as at the time of the site-visit the process was not yet clearly defined in terms of its scope and methodology. The panel further noted a risk of failing to comply with ESG 2.3 and 2.4 as audits will be conducted either by CYQAA's Council members or by CYQAA's staff, with no involvement of external experts. The Register Committee underlined that CYQAA is expected to report such substantial changes in its methodology immediately after they are adopted. CYQAA should therefore report the key aspects of its audit activities in reference to ESG Part 2, including all relevant aspects of audit procedures in relation to thematic analyses and internal quality assurance (ESG 3.4 & 3.6).¹
8. As concerns the remaining activities the Register Committee found that the report provides sufficient evidence and analysis on CYQAA's level of compliance with the ESG.
9. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

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2.4 – Peer-review experts

10. The Register Committee noted that the agency has a wide range of experts involved in institutional, departmental and programme evaluations and that higher education institutions can make reasoned objections concerning the composition of the Expert

¹See EQAR's Policy on Reporting Substantive changes <https://www.eqar.eu/register/reporting-and-renewal/> and the online form to submit change reports <https://www.eqar.eu/register/substantive-change-report/>

Evaluation Committees (EEC - panel of experts conducting external evaluation).

11. According to the analysis of the review panel, there is room for a more substantial role of students in evaluations, which is currently limited to a few issues (review report p. 41).
12. While the panel found the arrangement for the appointment of EEC transparent, the panel also underlined that CYQAA should publish the procedures and criteria for the selection of all categories of experts and to explicitly define and communicate the criteria for the selection of student experts.
13. In its additional representation the agency stated that it has published on its website the procedures and criteria for the selection of all categories of experts, including students. The agency further explained that the involvement of student experts is not restricted by the law or limited by CYQAA, and that the agency endeavours to support students' participation in evaluation processes. The agency further included details about a recent training workshop organised for student experts in preparation for an external review. CYQAA added that the review panel extract referring to the participation of students on limited matters referred to a few students and that the review panel concluded that 'all groups of experts feel that they participate on an equal footing' (review report p. 41).
14. The agency further argued that students are equal to the rest of the panel members, that they follow the same terms of reference, have the same responsibilities (defined in the "Guidelines for the Members of External Evaluation Committees"), receive the same information, directions and clarifications and have the same rights and obligations as the other panel members.
15. **Having considering the clarification provided by the agency, the Register Committee was able to follow the panel's conclusion of (substantial) compliance with ESG 2.4.**

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2.6 – Reporting

16. At the time of the review not all evaluation reports carried out by CYQAA were available on the agency's website. In its statement to the review report the agency explained that it has begun to upload the missing reports. The Register Committee confirmed at the time of its first consideration of CYQAA's application (June 2019) that most reports have been published (including reports with a negative outcome), however the Register Committee observed that a number of reports were nevertheless still missing.
17. The Register Committee further noted that the decision taken on cross-border higher education provisions are not published by CYQAA, as the agency only provides an explanatory note related to the outcome of these reviews. While the panel found this practice

satisfactory, the Committee could not follow the reasoning of the panel and underlined that the standard requirements specify that any formal decision based on the reports, should be published together with the report.

18. The analysis of the panel further showed that the quality of reports varies in terms of evidence provided, depth of analysis and consistency and that expert panels have a very short schedule to write evaluation reports.
19. In its additional representation CYQAA stated that, as it has previously committed to publishing all reports, that the agency has proceeded in doing so. The agency has further provided direct links to the different sections of its website where the reports of accredited institutions, programmes, joint programmes, franchised programmes are published, including the accreditations resulting in a negative decision.
20. The CYQAA added that it has also published the official decisions and reports for all the inbound 'franchised programmes' reviewed by the agency.
21. The Register Committee took note of the explanation concerning the time allocated to drafting of the report and welcomed the agency's development of a more detailed guideline to support the consistency and quality of reports (according to CYQAA additional representation and statement to the review report).
22. As the Committee could verify the link for all published reports and decisions by CYQAA, including the evaluation outcomes of cross-border higher education provision of 'franchised programmes', the Register Committee concluded that CYQAA now complies with the ESG 2.6.

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2.7 – Complaints and appeals

23. While the panel confirmed that CYQAA has in place formal and clearly defined processes for higher education institutions to appeal against its accreditation decision, the panel also pointed out that the process of considering appeals is not independent as it is being handled by the Council of CYQAA. The Register Committee understood that following the amendments to the law, CYQAA would appoint a three-member ad-hoc committee to handle appeals on a case by case basis.
24. In addressing complaints, the analysis of the panel shows that while CYQAA has an established practice for handling complaints there is a 'tendency to rely mainly on informal communication, and that the arrangements in place do not add up yet to a clearly defined and formal' procedure.

25. In its additional representation CYQAA stated that its revised appeals' procedure sets out the appointment of a three member Advisory Committee of Experts (ACE) to examine the appeals that have been approved by the Council of CYQAA. Additionally CYQAA has written a formal regulation concerning the withdrawal of the accreditation of an institution, department or program of study offered by the institution. The appeal in these cases is being handled by an Independent ad hoc Advisory Committees.
26. In addressing complaints CYQAA stated that the agency has published its complaints policy on its website and explained that individuals and organisations may issue complains about an accredited institution, department or programme. The Register Committee however noted that the concept of complaints is limited to general issues concerning higher education institutions and that it does not allow the possibility to address complaints related to the conduct of a review or complaints concerning the agency's own processes.
27. **While the Register Committee welcomed the steps taken by the agency to address its shortcomings related to the functioning of the Appeals Committee and the implementation of the Complaints Procedure, the Committee underlined the limited scope of the complaints procedure and that the implementation and functioning of these procedures are yet to be considered by a review panel.**
28. **Considering these limitations, the Register Committee could not follow the panels judgment and therefore concluded that CYQAA complies only partially with ESG 2.7.**

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3.3 – Independence

29. In its analysis the panel noted that the agency's Council members are appointed by the Council of Ministers upon recommendation from the Minister of Education and Culture (MOEC) who consults the Rectors' Conference and relevant professional bodies (except the student member, who is appointed by POFEN).
30. In terms of organisational arrangements, the Ministry is further involved in the recruitment process of the agency's staff and in CYQAA's financial services. The panel noted that "MOEC provides what the agency needs, as evidenced by a big budget increase and new staff, and the agency itself is proposing amendments on fees to the law which would further increase its income."
31. While the panel noted that the provision of the quality assurance law and the strict rules for Council members reduces the risk of the Ministry's interference with the agency's independence, the panel also stated that the current arrangements could be further revised, especially in reconsidering CYQAA's organisational ties with the Ministry of Education and Culture.

32. The Register Committee underlined the recommendations of the panel to ensure a clear separation of CYQAA from MOEC in its staff recruitment process, infrastructure and management of its own finances.
33. In its additional representation the agency presented its proposed legislation changes and argued that this would safeguard the agency's independence and the Council's autonomy. Considering the proposed changes the Register Committee was not convinced that the changes in the appointment of CYQAA's Council members would result in an increase of independence from the Ministry as, according to the proposed changes most of the Council members (eight out of eleven), are proposed (following stakeholder consultation in some cases) by the Minister.
34. The Register Committee took note of the provision regarding the operational independence of the agency and welcomed the steps taken to increase its financial independence i.e. including a budget provisions that will allow the agency to hire additional staff, if the agency intends to do so.
35. **While the Committee noted some progress towards safeguarding the independence and autonomy of the agency, the Committee underlined the existing close interlinkage between CYQAA and MOEC and therefore concluded that the agency complies only partially with ESG 3.3.**

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3.4 – Thematic analysis

36. The review panel's analysis show that CYQAA does not have a thorough and systematic analysis of findings from the evaluations conducted which could feed into a national quality assurance policy or guide quality improvement at higher education institutions. The panel nevertheless found that CYQAA's Annual Report includes a few paragraphs referring to general issues and good practices in higher education in Cyprus.
37. In its statement to the review report, the agency stated that it has collected the General Evaluation Reports from higher education institutions in Cyprus in November 2018 and has appointed a team of qualified members responsible for producing systematic analysis using the agency's collected reports. The agency added that the findings of its thematic analysis are expected to be published within 2019.
38. In its addition representation, the agency provided evidence of its implementation of thematic analysis and provided a link to its new publications. The agency has carried out an analysis of the "trends and dominant issues" within i.e. e-learning programme evaluation, master programmes' evaluation and the evaluation of short cycle programmes within colleges. The agency stated that it has made use

of its thematic results, identifying weaknesses in aspects related to distance learning and recommending further attention to these issues.

39. Considering the changes enacted by the agency, the Register Committee considered that CYQAA now complies with ESG 3.4.

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

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Conclusion:

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

42. The Register Committee considered that CYQAA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that CYQAA complies substantially with the ESG as a whole.

43. The Register Committee therefore approved the application for inclusion on the Register. CYQAA's renewed inclusion shall be valid until 29/02/2024².

² Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

44. The Register Committee further underlined that CYQAA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

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The Cyprus Agency of Quality Assurance and Accreditation in Higher Education (CYQAA)

Lemesou Avenue 5

Mary Koutselini, President of the Council

2112 Lefkosia

Cyprus

Brussels, 16 April 2018

Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A73 of 04/04/2018

Dear Ms Koutselini,

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

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

In order to prepare the deliberations of the Register Committee on CYQAA's activities within the scope of the ESG, EQAR contacted the agency via telephone on 10/04/2018 to clarify two of the activities mentioned below (*).

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

- *Institutional evaluation – accreditation*
- *Programme evaluation – accreditation*
- *Joint programme evaluation – accreditation*
- *Evaluation and accreditation of cross-border education, offered by local institutions in member states or third party countries*
- *Assessment of the conditions for the provision of cross-border education from foreign institutions in Cyprus*
- *Audit**
- *Departmental Evaluation-Accreditation**

Following the clarification provided by CYQAA, we also confirm that audits and departmental evaluation-accreditations are activities within the scope of the ESG as they follow predefined processes that involve evaluating an

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individual higher education institution (or its units) against a set of existing criteria, and the activities are substantially concerned with teaching and learning in higher education.

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

Furthermore, the self-evaluation report and external review report should also address CYQAA processes for the recognition of the accreditation activity of other quality assurance agencies and in particular how CYQAA ensures ESG compliance in cases where the agencies are not registered in EQAR.

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 CYQAA'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. CYQAA 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,

A handwritten signature in black ink, appearing to read "Colin Tück". The signature is fluid and cursive, with the first name "Colin" and the last name "Tück" clearly distinguishable.

Colin Tück
(Director)

Cc: ENQA (coordinator)



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12 March 2019

Colin Tück
EQAR Director

Subject: ENQA Coordinated Review of CYQAA - A Written Statement to EQAR

In his letter dated 26 February 2019, ENQA President has confirmed the Board of ENQA's decision to grant CYQAA membership of ENQA for five years (**ANNEX 1**).

CYQAA values its collaboration with its European partners, which provides rewarding insights in regard to the future of higher education in Cyprus and the key elements that will enable our Agency to fulfil the objectives of its establishment and to contribute to the quality assurance of the European Higher Education Area.

CYQAA is already in the process of taking action to address the critical points concerning the review, marked by the ENQA Board in its letter of 26 February 2019, and we confirm that we will carefully follow the recommendations made by the review panel in the review report. The measures taken to this direction will be communicated to the ENQA Board in the follow-up report to be sent within one year of the ENQA Board's decision.

The present written statement contains a brief presentation of the critical points marked by the ENQA Review Panel Report (**ANNEX 2**) and in the abovementioned ENQA Board letter published on the ENQA website:

In the Review report, *Summary of Commendations* (p. 50), the panel commends the Agency for,

- conducting its activities in a way which has inspired trust in the newly established external quality assurance system and promoted the value of quality among higher education institutions (ESG 3.1);
- managing its scarce resources in the initial years in a way which enabled it to combine core external quality assurance activities with some capacity development activities for itself and higher education institutions (ESG 3.5);
- ensuring, within the limits set by law, genuine involvement of higher education institutions in the development of its methodologies for external evaluations (ESG 2.2);
- establishing a truly multinational pool of experts and ensuring their extensive involvement in evaluations, which maximises benefits for institutions and increases the independence of processes (ESG 2.4).

The table below contains a synopsis of the review panel’s judgements (p. 50 - 51) as well as the ENQA Board’s final judgment in its letter of 26 February 2019, in relation to the Agency’s compliance with the ESG:

ESG number	Standard	Review Panel’s Judgement	ENQA Board’s Judgement
3.1	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.	Substantial compliance	Substantial compliance

3.2	Agencies should have an established legal basis and should be formally recognized as quality assurance agencies by competent public authorities.	Full compliance	Full compliance
3.3	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.	Substantial compliance	Partial compliance
3.4	Agencies should regularly publish reports that describe and analyze the general findings of their external quality assurance activities.	Non-compliance	Partial compliance
3.5	Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.	Full compliance	Full compliance
3.6	Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.	Substantial compliance	Substantial compliance
3.7	Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.	Full compliance	Full compliance
2.1	External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.	Substantial compliance	Substantial compliance
2.2	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.	Full compliance	Full compliance
2.3	External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include: <ul style="list-style-type: none"> - a self-assessment or equivalent - an external assessment normally including a site visit - a report resulting from the external assessment - a consistent follow-up 	Substantial compliance	Substantial compliance

2.4	External quality assurance should be carried out by groups of external experts that include (a) student member(s).	Substantial compliance	Substantial compliance
2.5	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.	Substantial compliance	Substantial compliance
2.6	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.	Partial compliance	Partial compliance
2.7	Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.	Substantial compliance	Partial Compliance

It is important to note that, in regard to standard 3.4 (Thematic Analysis) according to the Report:

[...] unlike the other ESG, it refers to the research function of an agency rather than its core external quality assurance activities and non-compliance with this ESG has no impact on how CYQAA operates as an institution and conducts its core activities or on the extent to which CYQAA complies with the other ESG (p. 50).

The following table contains a presentation of the panel's recommendations (p. 50 - 51) as well as the measures that the Agency is already implementing toward that direction.

A/A	Panel's Recommendation	CYQAA's Measures
1.	– <i>revise its mission statement to incorporate its compliance-assurance aim alongside that of supporting quality improvement in higher education; and devise a detailed two-year activity plan to guide effectively its</i>	<p>The mission statement has been revised according to the recommendation and has been published on the Agency's website: http://www.dipae.ac.cy/index.php/en/cyqaa/about-us</p> <p>The Agency has proceeded with the development and publication, on its website, of a more detailed two-year</p>

	<i>activities towards the aims set (ESG 3.1);</i>	strategic and activity plan that guides effectively the agency's activities towards the aims set. http://www.dipae.ac.cy/index.php/en/cyqaa/about-us
2.	– <i>discuss with its stakeholders how the procedure for the appointment and dismissal of the Council can be amended so that it is not perceived as providing space for interference of the national authorities; be fully separated from the Ministry of Education and Culture in organisational terms, including the staff recruitment process and financial services (ESG 3.3);</i>	<p>The Agency is in the process of amending the current law [136(I)/2015 to 47(I)/2016] to implement the review panel's recommendations. The relevant amendments have been sent to the Agency's stakeholders and they have been discussed during three (3) separate formal meetings with the stakeholders, which took place in February 2019.</p> <p>Most importantly within the proposed amendments, the Agency proposes the amendment of article 26 with the inclusion of the following, to safeguard its autonomy:</p> <p>"The Agency is a public entity.</p> <p>The Agency is independent and fully autonomous in regard to its competencies, according to the provisions of this Law and for the fulfillment of its purposes it may:</p> <p>(a) sue and be sued (b) accept, purchase and own movable or immovable property; (c) acquire immovable or movable property by lease, exchange, donation or otherwise; d) sell, exchange, donate, lease, assign, mortgage or charge its property, or in any way, use any movable or immovable property thereof; (e) to carry out any act that may result from the fulfillment of its purposes under this Law or undertaken or likely to be undertaken by or against public entities; and (f) recruit scientific or other personnel as defined in Regulations.</p> <p>3) The Agency is the Competent Authority of Cyprus to ensure and certify the quality of higher education."</p> <p>[The above translation of the proposed provision of the law is unofficial]</p>
3.	– <i>introduce the practice of analysing systematically the material collected in its external quality assurance activities and publishing regularly its findings to provide inputs to national policies, support institutions in the development of internal quality assurance and aid</i>	The Agency has collected the General Evaluation Reports from higher education institutions in Cyprus in November 2018. The Council has appointed a team made up by qualified members of the CYQAA personnel, which is responsible for the systematic analysis of the material collected. The findings, upon approval by the CYQAA Council will be published on the Agency's website within 2019.

	<p><i>its own reflection on its external quality assurance processes (ESG 3.4);</i></p>	<p>The team consists of CYQAA officers with experience and credentials in quality assurance in higher education, statistical analysis skills and Information Technology skills.</p> <p>Reflection on external quality assurance processes has been enacted through qualitative analysis of the reports regarding strengths, deficiencies and trends that can provide feedback to institutions, national policies and the agency's processes.</p> <p>This has been published in the 2017 Annual Report (please see English section p. 33-35) <i>Quality Report – The Role of CYQAA in Upgrading the Quality of Higher Education in Cyprus</i>, published on the Agency's website.</p> <p>http://www.dipae.ac.cy/archeia/ektheseis/etisia_ekthesi/2017_etisia_ekthesi_dipae.pdf</p>
4.	<p>– <i>rely increasingly on formal rather than informal mechanisms for feedback collection and improve its current mechanism for collecting feedback after each evaluation (a response submitted by each institution) so that institutions are explicitly requested to provide feedback and do so in a structured way (ESG 3.6);</i></p>	<p>The agency has always relied primarily on formal rather than informal mechanisms for feedback. Please see p. 19 of the SAR regarding feedback collection mechanisms including, structured meetings and workshops and via questionnaires addressed to higher education institutions and members of the external evaluation committees.</p> <p>We note, however, that the Agency appreciates the panel's recommendation and has prepared an additional questionnaire for the collection of feedback after each external evaluation.</p> <p>Additionally, the Agency's commitment to quality assurance and the mechanisms applied to achieve so are published in the Agency's <i>Quality Policy Statement</i> on its website:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa/quality-policy-statement</p>
5.	<p>– <i>incorporate into its standards the few aspects of Part 1 of the ESG, including external stakeholder involvement, which are currently not or not explicitly addressed; and gradually shift the focus in its processes after the first accreditation cycle from controlling institutions</i></p>	<p>The Agency has incorporated into its standards the aspects of Part 1 of the ESG including external stakeholder involvement as can be seen in the published template "External Evaluation Report for Basic Medical Education" (Doc. Num. 300.1.1/1). The document can be accessed at the following link:</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation/forms</p>

	<p><i>to supporting them in carrying their responsibility for quality and in quality improvement, with due consideration to be given to the effectiveness of internal quality assurance (ESG 2.1);</i></p>	<p>The Agency has revised its “External Evaluation Report” used for all programs of study (Doc. Num. 300.1.1) to incorporate these aspects for all programs of study. The template is published on the Agency’s website.</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation/forms</p> <p>It is noted that the Agency’s vision, as published on its website [...], prioritizes the cultivation of quality culture in higher education, which leads to self-regulatory policies based on shared values among all higher education institutions, common beliefs, high expectations and commitments toward quality.” Please see:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa/about-us</p> <p>This will become more evident, once the system of quality assurance in Cyprus matures, after the first accreditation cycle.</p>
6.	<p>– <i>expand the focus of the follow-up stage in its evaluations to embrace not only control-oriented measures but also support for quality improvement; give more consideration to the specificity of joint programmes in its briefings for experts to ensure full consistency in conducting evaluations; and take steps to include a site visit and a follow-up in the assessment of conditions for the provision of cross-border education by foreign HEIs (ESG 2.3);</i></p>	<p>CYQAA’s external quality assurance does not end with the report by the experts. The report, written by the experts on the template provided by the agency (Doc. Num. 300.1.1) provides clear guidance for institutional action. CYQAA has a consistent follow-up process for considering the action taken by the institution and accreditation is not granted unless all recommendations made by the EEC and the Council in its Final Report are implemented. The nature of the follow-up depends on the design of the external quality assurance.</p> <p>The examination of the follow-up stages for all programs (national, joint, cross-border) and the support for institutions’ quality improvement is included in the agenda of the 40th Council’s Summit, scheduled to take place on 18-19 of March 2019. The Council’s aim is the establishment of the best practice and the full compliance with ESG 2.3</p>
	<p>– <i>publish the selection procedure and criteria for all categories of experts on its website; provide additional training to students to prepare them to contribute to all relevant evaluation areas, including student involvement in</i></p>	<p>The Agency has published the criteria for all categories of experts on its website:</p> <p>http://www.dipae.ac.cy/index.php/en/experts/selection-criteria</p> <p>As for student training, the CYQAA Council, during its 37th Summit (10 - 11 December 2018) has approved the</p>

	<p><i>internal quality assurance and student-centred learning (ESG 2.4);* *</i></p>	<p>organization of a workshop aiming at providing additional training to students in order to prepare them to contribute to all relevant evaluation areas, including student involvement in internal quality assurance and student-centred learning. The tentative agenda includes the following:</p> <ul style="list-style-type: none"> - higher education in Cyprus - the purpose and the main stages of external evaluation - External Evaluation Criteria and Standards – Understanding and implementation - The CYQAA score system for each quality indicator/criterion - General operating principles of EEC members – code of Conduct - Voice of experience – Experienced student reviewer’s view - Voice of experience – Quality assurance agency’s view <p>The workshop is scheduled to take place in late April and it will be repeated every year.</p>
7.	<p>- <i>develop more detailed and written guidelines for experts to ensure greater consistency in scoring; state more explicitly in its decision-making procedure whether accreditation can be granted in any case where an HEI has not fully implemented a minor recommendation made in an external evaluation report (ESG 2.5);</i></p>	<p>The Agency has developed more detailed written guidelines in the Document Under the title “Guidelines for the Members of the External Evaluation Committees (Doc. Num. 600.1). The document is published on the Agency’s website.</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation/forms</p> <p>Guidelines to ensure a greater consistency in scoring are also incorporated in the published template “External Evaluation Report for Basic Medical Education” (Doc. Num. 300.1.1/1). The document can be accessed in the above link.</p> <p>The Agency has already incorporated guidelines to ensure greater consistency in scoring into its “External Evaluation Report” (Doc. Num. 300.1.1) for all programs of study. The template is published on the Agency’s website.</p>
8.	<p>- <i>put in place a mechanism to ensure that all external evaluation reports are of comparably high quality in terms of evidence to</i></p>	<p>This is now achieved through all the documents mentioned in point number 7 above.</p>

	<p><i>substantiate scores, comments being specific and consistency between scores and comments, and give due consideration to the effectiveness of internal quality assurance; provide space in the evaluation report template to address the specificity of joint programmes; introduce an annex to an external evaluation report for experts to comment on the implementation of recommendations by institutions, and to be published together with a report; and publish all reports, including those leading to refusal of accreditation, in addition to those currently available on its website (ESG 2.6);</i></p>	<p>In addition, the “External Evaluation Report” (Doc. Num. 300.1.1) has been amended to provide space in the evaluation report template to address the specificity of joint programmes. The document is published on the Agency’ website:</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation/forms</p> <p>The Agency has prepared the document “Second Evaluation Report” (Doc. Num. 300.1.2), which is used as an annex to the External Evaluation Report for experts to comment on the implementation of recommendations by institutions, and to be published together with a report. This document is also published on the Agency’s website.</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation/forms</p> <p>The Agency has begun to publish the reports leading to refusal of accreditation, in addition to those currently available on its website. The uploading of the reports will be completed within the coming weeks.</p>
	<p>– <i>establish a separate committee of experts for considering appeals against its accreditation decisions to ensure full transparency (as proposed in the amendments to the legislation already drafted); include the possibility of appealing against its decisions in the procedure for the assessment of conditions for the provision of cross-border education by foreign HEIs; and integrate current practices into a clearly defined complaints procedure (ESG 2.7).</i></p>	<p>The CYQAA Council is in the final stages of forming Formal Regulations including, amongst others, the <i>modus operandi</i> of the Agency. In relation to the termination of recognition and the withdrawal of accreditation the Regulations provide for the following:</p> <p><i>In the case of the withdrawal of the accreditation of an institution, department or program of study offered by the institution, the transition to a non-recognition status shall include the following stages: (i) the institution/department/program has received a first and second external evaluation (ii) the institution’s noncompliance to the standards is documented in a report drafted by the Agency, (iii) the institution submits an appeal which is examined by an Ad Hoc Committee (iv) in the case that the appeal is not accepted by the Ad Hoc Committee, the Council determines the date of accreditation withdrawal which is the date of the graduation of students who are already enrolled in the institution, department or program.</i></p>

		<p>[The above translation of the proposed provision of the Regulations is unofficial]</p> <p>When the Legislation is approved by the House of Representatives it will be published on the Agency's website:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa/legislation/law</p>
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Additionally, CYQAA carefully studies the general issues related to CYQAA's further development addressed by the review panel in the section Suggestions for further development (p. 52).

CYQAA's registration to EQAR will enhance the Agency's effort to be recognized as a reliable QA agency and to develop Cyprus into a competitive regional center of quality higher education and to contribute to further develop of QA in Europe.

Sincerely yours,



Prof. Mary Ioannidou - Koutselini
President of the Council
Cyprus Agency of Quality Assurance
and Accreditation in Higher Education

CYQAA - ADDITIONAL REPRESENTATION

Note: The following table presents the ESG upon which CYQAA was externally evaluated, together with: (a) the ENQA Review Panel’s judgement, (b) the ENQA Board’s judgment and (c) the EQAR Register Committee’s judgment as well as (d) the EQAR Register Committee’s considerations on each ESG where applicable. The final column (e) presents CYQAA’s additional representation on each point where considerations were expressed.

*In column (e) the underlined sections indicate the proposed additions to the legislation and those marked with strikethrough indicate the proposed deletions.

		(a)	(b)	(c)	(d)	(e)
ES G #	Standard	ENQA Review Panel’s Judgement	ENQA Board’s Judgement	EQAR Register Committee	EQAR Register Committee’s Considerations	CYQAA Additional Representation
2.1	External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.	Substantial compliance	Substantial compliance	Compliance	-	-

2.2	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 .	Full compliance	Full compliance	Compliance	-	-
2.3	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	Substantial compliance	Substantial compliance	Compliance	-	-

	- a report resulting from the external assessment - a consistent follow-up					
2.4	External quality assurance should be carried out by groups of external experts that include (a) student member(s).	Substantial compliance	Substantial compliance	Partial Compliance	<p>The Register Committee noted that the agency has a wide range of experts involved in institutional, departmental and programme evaluations and that higher education institutions can make reasoned objections concerning the composition of expert evaluation committees (EEC - panel of experts conducting external evaluation).</p> <p>According to the analysis of the review panel, there is room for a more substantial role of students in evaluations, which is currently limited to a few issues (review report p. 41).</p>	<p>The review panel states, on p. 41 of the Report, that “Students are competent to do their job insofar as they limit their contribution to the areas they are well familiar with.” This does not mean that students are restricted by the law or that they are instructed by the CYQAA to limit their participation in this manner. On the contrary, students are encouraged and advised by the Agency to feel equal and they are supported in every area and stage of the evaluation process. Therefore, the extract from page 41 refers to the attitude of some students all over the world, who may feel more comfortable focusing on the areas they are very familiar with and can see the evaluation areas from the perspective of their own experiences. The following extract from the same page of the panel’s report verifies the above clarification: “[...] all groups of experts feel that they participate on an equal footing” (p.41)</p> <p>http://www.dipae.ac.cy/archeia/ektheseis/alles_ektheseis/engacyqaa-external-review-report.pdf</p>
					While the panel found the arrangement for the	The Agency, since its establishment, had established selection criteria for the members of the External

				<p>appointment of EEC transparent, the panel also underlined that CYQAA should publish the procedures and criteria for the selection of all categories of experts and to explicitly define and communicate the criteria for the selection of student experts.</p> <p>Considering the concerns expressed by the panel, and in particular the partial engagement of students in expert evaluation committees, the Register Committee could not follow the panel's conclusion of (substantial) compliance and considered that CYQAA complies only partially with ESG 2.4.</p>	<p>Evaluation Committees (experts). This is also verified by the ENQA panel of experts which notes on p. 41 of the Review Report that "The selection criteria for academic experts are clearly defined and set the bar high, so those included in the pool can indeed be expected to have all the necessary expertise;"</p> <p>Upon recommendation of the Review Panel, CYQAA has proceeded with the publication of the procedure and the criteria for the selection of all categories of experts, including students, on its website:</p> <p>http://www.dipae.ac.cy/index.php/en/experts-en</p> <p>We highlight that the participation of student experts in the Agency's External Evaluation Committees (EECs) is provided by Law; students are equal to the rest of the members and they have the same terms of reference, responsibilities, rights and obligations.</p> <p>This is evident by the following established procedures of the Agency:</p> <p>The document "Guidelines for the Members of External Evaluation Committees" is sent to all the members of the EEC, including the students, together with the invitation to participate in the EEC. This document contains, amongst others, the "Responsibilities of the EEC Members."</p> <p>http://www.dipae.ac.cy/archeia/entypa/600_1_Guidelines_2.pdf</p> <p>Furthermore, as part of the external evaluation procedure all the relevant documents (application, institution's self-assessment etc.) are sent to all the members of the EEC including student experts, to be studied before the site visit. All experts are reimbursed with an additional fee for the studying of all the material before the site visit.</p> <p>Additionally, students are obliged to participate in the Orientation and Briefing Session conducted by the Agency before the site visit. They receive the same information, directions and clarifications as the rest of the members of the EEC.</p>
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					<p>The student expert is actively present and her/his terms of reference prescribe that he/she should contribute during all stages of external evaluation (studying the material, preliminary meeting of the EEC, briefing, site visit, drafting of the report, possible feedback requested from the EEC by the CYQAA Council).</p> <p>We would like to direct you to a recent student information and training workshop organized for the student experts designed specifically for student involvement in the EECs.</p> <p>In the link below you may have access to the presentations including, amongst others, guidance regarding all stages and all areas in the external evaluation procedure as well as guidelines on the feedback requested on their behalf on all the standards and criteria included in the external evaluation report:</p> <p>http://www.dipae.ac.cy/index.php/en/news-and-events/events/392-student-information-and-training-workshop-for-their-participation-in-the-external-evaluation-process-of-cyqaa-2</p> <p>Furthermore, the Agency would like to stress that it has a clear understanding of student involvement in quality assurance which is reflected in the following principles:</p> <ul style="list-style-type: none"> • “First of all, the student representative is, of course, a student, and as such the only one who has the ability to see the situation from the perspective of a student and of a learner. • Their insight and knowledge of the higher education system is thus significant, and they have the ability to see and understand consequences for the students’ situation, which the other panel members may not take into account. • A third role of the students consists in being the largest stakeholder in higher education, investing time and money in education. As such they have a special interest in factors that are relevant in making education a good investment.” <p>From: Trends 2018 “Learning and Teaching in the European Higher Education Area”, European University Association</p>
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2.5	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.	Substantial compliance	Substantial compliance	Compliance	-	-
2.6	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.	Partial compliance	Partial compliance	Partial Compliance	<p>The Register Committee noted CYQAA's intention to publish all reports, however at the time of the review not all evaluation reports were available on the CYQAA website.</p> <p>In its statement to the review report the agency explained that it has begun to upload the missing reports, and that this process will be completed within the coming weeks. The Register Committee confirmed that most reports have been published (including reports with a negative outcome) however a number of reports were nevertheless still missing.</p>	<p>Following its commitment to publish all reports in its statement to the review report, the Agency has proceeded with the publication of all reports on its website.</p> <p>Accredited Programmes: We would like to direct you to the following link where all accredited programmes are published together with the relevant reports: http://www.dipae.ac.cy/index.php/en/accreditation-en/accredited-programmes-en</p> <p>Rejected Programmes: We would like to direct you to the following link where all rejected programmes are published together with the relevant reports: http://www.dipae.ac.cy/index.php/en/accreditation-en/rejected-programmes-en</p>

The panel also noted that CYQAA's decisions on the review of cross border higher education provision are not published as CYQAA provides an explanatory note related to the outcome. While the panel found this practice satisfactory, the Committee could not follow the reasoning of the panel and underlined that the standard requirements specify that any formal decisions should be published together with the report.

The missing reports and decisions regarding cross border higher education have been published and according to the Agency's policy all formal decisions will continue to be published together with the reports and the institution's response.

Joint programmes

We would like to emphasize that at the time of the review, the Agency had externally evaluated only 6 (six) joint programmes of study (SAR, p. 13). By that time the agency had only one published report for joint programmes.

Accredited Joint Programmes

We would like to direct you to the following link where all accredited joint programmes are published together with the relevant reports:

<http://www.dipae.ac.cy/index.php/en/accreditation-en/accredited-programmes>

Joint programmes are also published separately, under the heading "Cross Border Programmes" and may be accessed at the following link:

<http://www.dipae.ac.cy/index.php/en/evaluation-en/joint-programmes-en>

Rejected Joint Programmes:

We would like to direct you to the following link where all rejected joint programmes are published together with the relevant reports:

<http://www.dipae.ac.cy/index.php/en/accreditation-en/rejected-programmes>

Franchised programmes

During the site visit, it was explained to the review panel that national legislation does not provide for the external evaluation of cross border programmes of study which fall under the "Franchised" category. It was clarified that

				<p>The analysis of the panel further show that the quality of reports varies in terms of evidence provided, depth of analysis and consistency and that expert panels have a very short schedule to write the evaluation reports.</p> <p>The Register Committee welcomed the agency's development of a more detailed guideline to support the consistency and quality of reports (CYQAA Statement to the review report) as well as the intention of the agency to publish all reports.</p> <p>The Committee however concluded that not all reports</p>	<p>national legislation provides for a desk-based review of such programmes.</p> <p>The desk-based review must be repeated every five years. The franchised programmes having been reviewed by the Ministry of Education, within the previous legislative framework before the establishment of the independent CYQAA, must all now be submitted to the Agency for a desk-based review. According to the Law, for the renewal of the recognition of a franchised programme, an evaluation report of the QAA of the franchisor institution must be submitted to the CYQAA.</p> <p>We kindly ask the Register Committee to bear in mind the specific legislative framework in Cyprus and note that we have, nevertheless, proceeded with the publication of the Agency's official documents/reports "Preliminary Assessment" and "Final Assessment" for all the in-bound franchised programmes reviewed by the Agency. Please follow the link below:</p> <p>http://www.dipae.ac.cy/index.php/en/evaluation-en/reviewed-franchised-programmes-en</p> <p>The members of the EEC are allocated a full day to write the external evaluation report. So far we had no complaints from the experts as per the procedure and the time allocated. Please note that the members of the EEC for the evaluation of the medical schools have asked for and have been provided with two days for writing the report. It is also worth noting that the EEC's schedule of the site-visit and of writing the report is finalized with the contribution of the EEC's experts, who therefore can suggest changes, including those for the days allocated for writing the report. However, we strongly believe that the day/s following the site visit is/are the most productive and efficient period as all of the members of the EEC are together, in person, and the experience of the onsite visit and their evaluation of the institution/department/programme is still recent.</p> <p>In addition to the above, we would like to bring to the Register Committee's attention, that the Agency distributes to the members of the EEC's a questionnaire:</p>
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					<p>and decisions have been published by CYQAA (including the evaluation outcomes of cross-border higher education provision) and noted that the quality of reports could be further improved.</p> <p>The Register Committee therefore concurred with the review panel's conclusion that the agency only partially complies with the ESG 2.6.</p>	<p>"Feedback from EEC Members." The members of the EEC's are requested to indicate from a scale 1 – 5 (very dissatisfied, dissatisfied, satisfied, very satisfied) the degree of satisfaction with the time provided for the drafting of the report. To this question 50% noted very satisfied, 36% noted satisfied, 11% noted somehow satisfied and only 2% noted dissatisfied and 1% very dissatisfied.</p> <p>Nevertheless, the Council of the CYQAA on its 43rd Summit (10 – 11 June 2019) decided to share the responsibility of defining the duration of the time allocated to drafting the report with the panel of experts. The experts will be asked to inform the Agency before the finalization of the external evaluation schedule whether they need one/two or more full days for writing the report for a specific programme of study.</p>
2.7	Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.	Substantial compliance	Partial Compliance	Partial Compliance	<p>The panel confirmed that CYQAA has in place a formal and clearly defined processes for higher education institutions to appeal against its accreditation decision. The panel however pointed out that the process of considering appeals is not independent as it is being handled by the Council of CYQAA.</p> <p>The Register Committee understood that following the amendments to the law, CYQAA would appoint a three-member ad-hoc committee to handle appeals on a case by case basis.</p>	<p>In regard to the consideration of appeals, the CYQAA Council took action toward the implementation of procedures to safeguard objective and independent decision making:</p> <p>Appeals:</p> <p>Published Procedure:</p> <p>On 10-11 June 2019, the Council of the CYQAA in its 43rd summit adopted the following Appeals Procedure which elaborates on article 20(2) (g) (i) of the Law:</p> <ol style="list-style-type: none"> 1. An appeal can be submitted to the Council of the CYQAA within one month from receipt of the decision of rejection. 2. The Agency's Council shall decide to either accept the appeal or reject it, considering it unsubstantiated or/ evidently based on grounds violating the Law.

						<p>3. If the Council decides to accept the appeal appoints a three-member Advisory Committee of Experts (ACE) which examines the grounds of the appeal. The appeal may only be based on those facts which are contained in the institutions' files and the Council's minutes. The members of the Advisory Committee sign the declaration of Absence of Conflict of Interest.</p> <p>4. The Advisory Committee's examination shall be carried out based on the data contained in the evaluation file of the institution and the grounds set out in the appeal.</p> <p>5. In case of lack of relevant information or need for clarification, the Advisory Committee may request further information from the Agency.</p> <p>6. The Advisory Committee submits its report to the Council, within one month from the receipt of the file, containing the grounds of the appeal, the corresponding data available in the institution's file and its justified observations in the light of the available evidence.</p> <p>7. The Agency edits its final decision within two months from the receipt of the appeal and the institution has no right to submit a new appeal. The decisions of the Agency are subject to appeal to the Court only.</p> <p>The procedure is published on the Agency's website and may be accessed at the following link:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa-en/appeals-procedure-en</p> <p>Regulations: As noted in our Review Statement to EQAR, the CYQAA Council has written formal regulations including, amongst others, the modus operandi of the Agency.</p> <p>In relation to the termination of recognition and the withdrawal of accreditation the Regulations provide for the following: In the case of the withdrawal of the accreditation of an institution, department or program of study offered by the institution, the transition to a non-recognition status shall include the following stages:</p> <p>(i) the institution/department/program has received a first and second external evaluation</p>
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					<p>(ii) the institution's noncompliance to the standards is documented in a report drafted by the Agency,</p> <p>(iii) the institution submits an appeal which is examined by an Ad Hoc Committee (iv) in the case that the appeal is not accepted by the Ad Hoc Committee, the Council determines the date of accreditation withdrawal which is the date of the graduation of students who are already enrolled in the institution, department or program.</p> <p>Law: Additionally, the Agency has already submitted to the relevant authorities its proposal for an amending law which includes a provision for the handling of the appeals by Independent at hoc Advisory Committees. The proposed provision is the following:</p> <p>[...]</p> <p>(i) The institution may, within one (1) month from the receipt of the final Report of the Agency, submit an appeal requesting the decision's re-examination by the Agency, stating the grounds which, in its opinion, justify its withdrawal and the re-examination of the Evaluation Report.</p> <p>(ii) The Agency shall, within three (3) months from the submission of the appeal, consider the grounds of the appeal submitted by the institution and decide whether its referral to an advisory ad hoc Committee is justified or the Agency decides on the basis of data it has before it, and communicates its decision to the institution and the Minister for their information.</p> <p>(iii) The Council may, where it is judged necessary, to refer the appeal to an advisory ad hoc committee consisting of independent judges.</p> <p>(iv) The Agency shall establish and maintain a register of independent judges including renowned Professors, Associate Professors and Assistant Professors from recognized foreign universities and / or research centers and / or experts on quality assurance in higher education and / or lawyers, from which it appoints, for each case, a three-member advisory ad hoc committee (Ad Hoc Committee) for the purpose of examining appeals.</p>
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					<p>The members of the advisory ad hoc committee are remunerated in a manner similar to the members of the External Evaluation Committees and at a fee that does not exceed the remuneration of one full day. The fee is charged to the institution and paid when the institution is notified by the Agency that its appeal is referred to an advisory ad hoc advisory committee.</p> <p>(v) In the case which the appeal is referred to the advisory ad hoc committee, the re-examination will be based on the data contained in the evaluation file of the institution and the grounds set out in the appeal in order to submit a relevant justified suggestion to the Council of the Agency to issue its final decision which is made known to the Institution and the Minister for their information.</p> <p>vi) With the completion of the review following the submission of an appeal, in accordance with subparagraphs (i), (ii), (iii), (iv) and (v) the institution has no right to file a new appeal.</p> <p>The appeal, the Advisory Committee's report, and the final decision of the CYQAA are published in the Agency's website.</p> <p>[The above translation of the proposed provision of the Regulations and Law is unofficial] When the Legislation is approved by the House of Representatives it will be published on the Agency's website:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa/legislation/law</p> <p>During the drafting of the Amendment Law, a dialogue was held with all stakeholders, including all higher education institutions, the Ministry of Education and Culture and the KYSATS. The written feedback of all stakeholders was submitted at the invitation of the Agency, as well as during meetings organized by the Agency and held at its premises. Having collected the views of the stakeholders, the Agency has adopted those that serve the public interest by ensuring quality in higher education.</p>
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In addressing complaints, the analysis of the panel also shows that while CYQAA has an established practice for handling complaints there is a 'tendency to rely mainly on informal communication, and that the arrangements in place do not add up yet to a clearly defined and formal' procedure. The Register Committee underlined the recommendations of the panel on the establishment a separate and independent committee of experts for considering appeals and integrating current practices into defining a formal complaints procedure. Considering the above-mentioned concerns, the Register Committee could not follow the judgement of the panel of (substantially) compliance and considered that CYQAA only partially complies with ESG 2.7.

Complaints:

The Agency has published its complaints' policy on its website. The Complaints' Policy Includes the following:

Individuals or organisations that have substantiated concerns about an accredited institution's/department's/programme's compliance with the Agency's external evaluation criteria and/or the ESG and/or the WFME standards may bring those to CYQAA's attention.

The following steps will be followed:

1. The CYQAA Council shall consider whether a complaint is substantiated. A complaint will only be considered if it is credible, substantiated, and supported by appropriate evidence, references, examples etc. The complaints may only relate to an accredited institution's/department's/programme's compliance with the Agency's external evaluation criteria and/or the ESG and/or the WFME standards, or the integrity of the external evaluation process on the basis of which CYQAA provided accreditation to the said institution/department/programme. Concerns regarding national legislation, European Union law, or any other applicable rules shall be addressed with the competent courts or authorities.
2. If the complaint is not substantiated the CYQAA will take no action on the complaint and inform the complainant accordingly.
3. If the complaint is substantiated CYQAA will inform the higher education institution of the complaint and will ask the institution to provide clarifications or information related to it.
4. If the complaint is substantiated but relates to an isolated case and does not substantially affect the institution's/department's/programme's compliance with the abovementioned standards, the CYQAA Council shall issue a formal warning to the institution. The warning does not affect the accreditation status of the institution/department/programme. A formal warning statement is published on the entry of the

						<p>institution/department/programme on the Agency's website.</p> <p>5. In the case the complaint is substantiated and leads to major concerns that the accredited institution/department/programme no longer fulfils the criteria upon which accreditation was granted, the CYQAA Council shall examine, through the audit procedure, whether the Accreditation criteria continue to be met according to article 17(3)(g) of the legislation.</p> <p>6. In the case the audit procedure further substantiates the complaint and leads to major concerns that the accredited institution/department/programme no longer fulfils the criteria upon which accreditation was granted, the CYQAA Council may decide to:</p> <ul style="list-style-type: none"> o revoke the Accreditation decision, or o initiate an external evaluation process of the institution/department/programme. <p>In the scenarios (5) and (6) the higher education institution is invited to make representation before a final decision is made. The final decision is then communicated to the institution and the complainant and it is published.</p>
3.1	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.	Substantial compliance	Substantial compliance	Compliance	-	-

	These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.					
3.2	Agencies should have an established legal basis and should be formally recognized as quality assurance agencies by competent public authorities.	Full compliance	Full compliance	Compliance	-	-
3.3	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.	Substantial compliance	Partial compliance	Partial Compliance	In its analysis the panel noted that the agency's Council members are appointed by the Council of Ministers upon recommendation from the Minister of Education and Culture (MOEC) who consults the Rectors' Conference and relevant professional bodies (except the student member, who is appointed by POFEN.	<p>Independence of the Council:</p> <p>Legislation amendments: The Agency is in the process of amending the current law [136(I)/2015 to 47(I)/2016] to implement the review panel's recommendations aiming to safeguard further the Council's autonomy and the Agency's independence.</p> <p>Most importantly the Agency proposes the amendment of article 28 which provides for the Council members' appointment. Article 28 will be amended as follows:</p> <p>28.- (1) The Board of the Agency shall be appointed by the Council of Ministers upon the recommendation of the Minister and shall consist of, be independent and fully autonomous as per its competencies and its decisions and it is appointed by the Council of Ministers, upon recommendation of the Minister after consultation with the following bodies, depending on the case, or/and with</p>

					<p><u>direct written expression of interest to the Minister, for appointment, as follows, -</u></p> <p>(a) Eight (8) members at the rank of Professor or Professor Emeritus with experience in the management of universities and, as far as possible, on issues of quality assurance in Higher Education, of which:</p> <p>(i) Five (5) members shall be Professors or Professors Emeriti of universities operating in the Republic, <u>who are proposed by the Minister or/and submit their interest to the Minister in writing for appointment</u>, out of whom three (3) shall come from the public universities of the Republic,</p> <p>(ii) three (3) members shall be prominent academics at the rank of Professor or Professor Emeritus coming from two (2) at least different countries, preferably from member states <u>who are proposed by the Minister after consultation with the Rector's Conference so that all scientific fields are fully covered or/and submit their interest to the Minister in writing for appointment</u>.</p> <p>(b) Two (2) members of professional organizations and bodies <u>who are proposed by professional organizations and bodies operating in the Republic or/and submit their interest to the Minister in writing for appointment</u>;</p> <p>(c) One (1) member who shall be an undergraduate student who preferably has participated in a collective quality assurance organ of his institution and who is proposed by the Pancyprian Federation of Student Unions (POFEN):</p> <p>It is understood that, persons who have finally convicted of an offence involving dishonesty or moral turpitude cannot be appointed as members of the Board of the Agency.</p> <p><i>It is further understood that the work and behavior of the Council members are governed by a code of conduct.</i></p> <p>(2) For the appointment of the members of the team of persons as in paragraph (a) of subsection (1) provided, the Minister shall consult with the Rectors' Conference in the Republic so that the members of this team may adequately cover the various scientific fields.</p> <p>(3) For the appointment of the members of the team of persons as in paragraph (b) of subsection (1) provided, the Minister shall consult with the relevant competent authorities and authorized organs, as the case may be.</p>
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					<p>(4) The members of the Board of the Agency shall elect from</p> <p>among the members of the team of persons referred to in paragraph (a) of subsection (1), one (1) member as Chairperson and one (1) member as Vice-Chairperson.</p> <p>[...]</p> <p>[The above translation of the proposed provision of the law is unofficial]</p> <p>It is highlighted that the working legal document was sent to all institutions of higher education and other stakeholders. Their written feedback was sent to the Agency and was discussed during formal meetings which took place in February 2019.</p> <p>The consultation was carried out throughout the processing of the amendments. In addition, the collection of feedback from stakeholders and the discussions that took place, the Agency assessed alternative choices and studied in depth information provided by EQAR registered quality assurance agencies which have similar characteristics to CYQAA and Cyprus.</p> <p>Code of Deontology: Further to the above, since the Agency's establishment the members are governed by the following code of conduct which was agreed unanimously amongst Council members during the 2ns summit in January 2016.</p> <p>The President and the Members of the Agency's Council:</p> <ol style="list-style-type: none">1. Declare that will operate objectively within the scope of improving the quality of Higher Education and will abstain, in any way, from promoting the interests of any institution, organisation, body or service.2. Declare that will apply the principles of non-discrimination during the carrying out of their duties.3. Should not participate in the discussion and decision making process of any programmatic/departmental/institutional
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					<p>In terms of organisational arrangements, the Ministry is further involved in the staff recruitment process of the agency and financial services.</p> <p>The panel noted that “MOEC provides what the agency needs, as evidenced by a big budget increase and new staff, and the agency itself is proposing amendments on fees to the law which would further increase its income.”</p> <p>While the panel noted that the provision of the quality assurance law and the strict rules for Council members reduces the risk of the Ministry’s interference with the agency’s independence, the panel also stated that the current arrangements could be further revised, especially in reconsidering CYQAA’s organisational ties with Ministry of Education and Culture.</p> <p>The Register Committee underlined the recommendation of the panel to ensure a clear separation of CYQAA from</p>	<p>accreditation of their University. Their voluntarily withdrawal of the room must be recorded in the minutes of the Council’s meeting.</p> <ol style="list-style-type: none"> 4. Should not participate in the discussion and decision making process of subjects which refer to their Universities or/and may create conflict of interest. Their voluntarily withdrawal of the room must be recorded in the minutes of the Council’s meeting. 5. Should not try to diminish the value and characteristics of programmes/departments/administration and operation of the institutions of Higher Education. 6. Should not be associated with affairs which may create conditions of conflict of interest during the assignments of the duties they have undertaken. <p>Should treat all information, regarding the discussions during the Council’s meetings, as confidential.</p> <p>The above is also published on the Agency’s website and can be accessed at the following link:</p> <p>http://www.dipae.ac.cy/index.php/en/cyqaa-en/code-of-deontology-en</p> <p>Independence of the Agency: Since its establishment, the Agency never felt that its independence and autonomy are at stake, in terms of its operation and organizational arrangements which are safeguarded by the relevant legislation and are under the effective control of the House of Representatives. In its annual budgets there has always been a provision for the purchase of services and this has been increased in the new budget (Article 03583 of the budget €155.160).</p> <p>In terms of organizational arrangements, we would like to highlight that the Agency has taken action, through proposed amendments to the legislation for the inclusion of the following new provision, to further safeguard its autonomy:</p> <p>Article 26 of the current legislation which provides that “26.-(1) There is hereby established an independent Agency of Quality Assurance and Accreditation in Higher Education by the name “The Agency of Quality Assurance and Accreditation in Higher Education” under</p>
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					<p>MOEC in its staff recruitment process, infrastructure and management of its own finances.</p> <p>While the Committee noted from the agency's statement to review report that the current law will be amended so as to safeguard the autonomy of the agency, the Committee concluded that as it stands the agency only partially complies with ESG 3.3.</p>	<p>the international designation "The Cyprus Agency of Quality Assurance and Accreditation in Higher Education", called "the Agency".</p> <p>Is supplemented with the following:</p> <p>"The Agency is an independent authority.</p> <p>The Agency is independent and fully autonomous in regard to its competencies, according to the provisions of this Law and for the fulfillment of its purposes it may:</p> <p>(a) sue and be sued (b) accept, purchase and own movable or immovable property; (c) acquire immovable or movable property by lease, exchange, donation or otherwise; d) sell, exchange, donate, lease, assign, mortgage or charge its property, or in any way, use any movable or immovable property thereof; (e) to carry out any act that may result from the fulfillment of its purposes under this Law or undertaken or likely to be undertaken by or against public entities; and (f) recruit scientific or other personnel as defined in Regulations.</p> <p>3) The Agency is the Competent Authority of Cyprus to ensure and certify the quality of higher education".</p> <p>[The above translation of the proposed provision of the law is unofficial]</p> <p>Further to the above, we attach, herewith, a letter from the Acting Permanent Secretary of the Ministry of Education and Culture confirming that the Agency is independent and also financially independent and autonomous. Additionally, the letter confirms that the Agency's budget is in the process of being formed as a separate article of the Budget for the fiscal year 2020 and thereafter. Most importantly the letter confirms that the new budget will include provisions that further clarify the Agency's right to hire additional personnel if it wishes to (ANNEX).</p>
3.4	Agencies should regularly publish reports that describe and analyze the	Non-compliance	Partial compliance	Partial Compliance	<p>The review panel's analysis show that CYQAA does not have a thorough and systematic analysis of findings from the evaluations conducted which could feed into a national quality assurance policy or guide quality</p>	<p>CYQAA, within the framework of the competencies conferred on it by the relevant Legislation and on the basis of the European Standards and Guidelines (ESG), has published Thematic Analyses resulting from the external evaluations of programmes of study carried out by the Agency. The Thematic Analyses describe and analyse the general findings of the Agency's external</p>

<p>general findings of their external quality assurance activities.</p>					<p>improvement at higher education institutions.</p> <p>The panel nevertheless found that CYQAA's Annual Report includes a few paragraphs referring to general issues and good practices in higher education in Cyprus.</p> <p>In its statement to the review report, the agency stated that it has collected the General Evaluation Reports from higher education institutions in Cyprus in November 2018 and has appointed a team of qualified members responsible for producing systematic analysis of the material collected. The findings are expected to be published within 2019.</p> <p>Considering the changes enacted by the agency, the Register Committee was unable to concur with the review panel's conclusion of non-compliance and considered that CYQAA complies partially with ESG 3.4.</p>	<p>quality assurance activities from external evaluations of specific time periods.</p> <p>CYQAA wishes has notified the institutions of higher education and has drawn their attention to the Thematic Analyses which have been published on its website:</p> <ol style="list-style-type: none"> 1. E-learning programmes' evaluation: Trends and Dominant Issues 2. Master Programmes' Evaluation: Trends and Dominant Issues 3. Colleges' Short Cycle Programmes: Trends and Dominant issues <p>The Agency has advised the institutions that particular attention needs to be paid to the experts' remarks for all programmes and especially on distance learning programmes, so that the same weaknesses do not reappear in the programs during the evaluations and re-evaluations.</p> <p>Please see the following link, where CYQAA's Thematic Analyses are published:</p> <p>http://www.dipae.ac.cy/index.php/en/thematic-analysis/thematic-analysis</p> <p>We would also like to direct you to the announcement published regarding the Thematic Analyses:</p> <p>http://www.dipae.ac.cy/index.php/en/news-and-events/announcements/410-03-06-2019-thematic-analysis-en</p> <p>Additionally, we direct you to a recent announcement regarding Masters Programmes:</p> <p>http://www.dipae.ac.cy/index.php/el/nea-ekdiloseis/anakoinoseis-el/429-11-07-2019-politiki-gia-master</p>
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3.5	Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.	Full compliance	Full compliance	Compliance	-	-
3.6	Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.	Substantial compliance	Substantial compliance	Compliance	-	-
3.7	Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.	Full compliance	Full compliance	Compliance (by virtue of applying)	-	-