

**Approval of the Application**  
**by IEP - Institutional Evaluation Programme (IEP)**  
**for Renewal of Inclusion on the Register**

**Register Committee**  
2/3 April 2019

Ref. RC23/A68

Ver. 0.1

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<b>Application of:</b>	02/03/2018
<b>Agency registered since:</b>	15/12/2011
<b>External review report of:</b>	21/02/2019
<b>Review coordinated by:</b>	ENQA - European Association for Quality Assurance of Higher Education
<b>Review panel members:</b>	Patrick van den Bosch (Chair), Patrick van den Bosch, Danutė Rasimavičienė, Francisco Joaquín Jiménez (academic) González (student)
<b>Decision of:</b>	03/04/2019
<b>Registration until:</b>	29/02/2024
<b>Absented themselves from decision-making:</b>	Freddy Coignoul, Riitta Pyykkö, Beate Treml, Jacques Lanarès (guest)
<b>Attachments:</b>	<a href="#">1. Confirmation of eligibility, 15/03/2018</a> <a href="#">2. External Review Report, 21/02/2019</a>

1. The application of 02/03/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 15/03/2018.
3. The Register Committee considered the external review report of 21/02/2019 on the compliance of IEP with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

**Analysis:**

4. In considering IEP's compliance with the ESG, the Register Committee took into account its only activity of "*Institutional evaluation*".
5. The Register Committee found that the report provides sufficient evidence and analysis on IEP's level of compliance with the ESG.
6. The Register Committee considered that IEP is different from many other registered agencies due to the fact that it does neither operate under one single obligatory external quality assurance system, nor within obligatory external quality assurance systems that are open to different agencies. Moreover, its evaluations are fully improvement-oriented and do not lead to any formal judgements or labels. The Committee acknowledged that such voluntary evaluations could be

offered under various different frameworks and organisational settings, but recognised that IEP (and EUA) deliberately decided to model IEP as a quality assurance agency that complies with the ESG and seeks registration on EQAR.

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7. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

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### 2.1 – Consideration of internal quality assurance

In the previous decision of renewal of IEP’s registration, the Register Committee flagged for attention the extent to which the different elements of Part 1 of the ESG were reflected in the agency’s institutional evaluation reports.

The Register Committee noted the review panel findings that show that IEP amended the guidelines for institutions as well as the guidelines for evaluation teams to directly reference 2015 ESG Part 1. The panel commended IEP’s efforts to analyse reports and to provide clear guidance on implementing the ESG standard 2.1.

**Having considered the mapping of ESG part I and the analysis of the panel, the Register Committee concluded that the flag was addressed.**

**The Committee underlined the panel’s suggestion to consider a possible second analysis of how ESG Part 1 is addressed in IEP reports, bearing in mind the balance to be struck between addressing Part 1 of the ESG and the flexible, improvement-oriented approach of IEP.**

### 2.3 – Implementing processes

Following the last review of IEP, the Register Committee flagged for attention the follow-up procedures that are part of IEP’s evaluations.

The panel referred to the concept of progress reports, which should outline the institution’s response to the evaluation report and its recommendations approximately one year afterwards. According to IEP’s self-evaluation, after the progress report was introduced as a requirement in the guidelines, half of the evaluated institutions have responded by submitting such a report within a year of receipt of the final evaluation report.

The panel further reported that IEP has invested efforts to increase the participation of institutions in a follow-up evaluation, which is a separate process for which the institution needs to sign up. The follow-up is a mechanism to discuss progress based on the initial evaluation and any new issues with the team consisting of experts from the previous evaluation and new members. The panel commented that expecting all institutions to participate in such follow-ups might be costly and not realistic.

The Register Committee acknowledged the steps taken by IEP to enhance the participation in follow-up processes, but noted that the current follow-up model does not ensure for a consistent follow-up for all evaluated higher education institutions. The Committee considered that a progress report, which is a relatively light requirement, could possibly be a feasible follow-up for all evaluated institutions. The Committee took note of the panel's concern that making the requirement more stringent would pose a risk of turning progress reports into a purely formal requirement, but considered that such a risk had not necessarily to become true. Moreover, the same argument could be used against any obligatory element in quality assurance, or obligatory quality assurance as such.

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The Register Committee therefore concluded that the flag was partly addressed and could not follow the review panel's judgement of compliance, but concluded that IEP complies only partially with ESG 2.3.

## 2.7 – Complaints and appeals

The Register Committee noted the agency's argument that there was no requirement for an appeals procedure in its case "as IEP evaluations do not result in decisions".

Based on the analysis of the panel, the Register Committee, however, understood and concurs with the panel that IEP's 'substantive' complaints are, in fact, appeals in the ESG terminology: they enable the institution to "questions the formal outcomes of the process" (in this case, the evaluation report), where it can "demonstrate that the outcome is not based on sound evidence" (see guidelines to standard 2.7), which IEP's complaints policy translates to erroneous judgments, erroneous assumption of non-existent factors as facts, failure in exploring relevant facts, and ignoring or misjudging factual base.

**Having acknowledge that IEP's procedure covers situation related to both appeals and complaints and since IEP has previously handled such processes with success, the Register Committee concurred with the conclusion by the panel that IEP complies with ESG 2.7.**

In addition to the panel's suggestion the Committee further considered that IEP might explain in its documents that "substantive" and "procedural" complaints are equivalent to "appeals" and "complaints", respectively, as described in the ESG.

## 3.2 Official status

The Register Committee noted that IEP itself does not have separate legal personality and therefore it is represented by EUA in all legal and contractual matters.

The Committee acknowledged that the recognition of IEP as a quality assurance agency by public authorities is demonstrated by the numerous contracts that IEP (represented by EUA) signed with national authorities for conducting evaluations, or by the selection of IEP as an evaluating body through a public procurement procedure.

**As noted in the EQAR Policy on the Use and Interpretation of the ESG, the Register Committee interprets the requirement of formal recognition in a broad sense and therefore concurred with the panel's conclusion that IEP complies with the standard.**

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### 3.3 – Independence

In its last decision of renewal, the Register Committee noted that IEP's independence remains an issue for continuing attention, since IEP is closely integrated within and dependent on EUA, at least at the formal level. The Register Committee has therefore flagged this matter for further attention at that time.

The review panel's findings show that EUA discontinued the practices of formally endorsing the appointment of IEP's Steering Committee members and of appointing a member of the EUA Board as an ex-officio member of the IEP Steering Committee.

While IEP's Steering Committee has full responsibility for the development of strategies and policies, the Register Committee noted that the Steering Committee ensure the strategic development of the IEP in the context of EUA's development priorities.

Moreover, EUA provides the overall support, including physical infrastructure and financial management through separate accounts; both entities have a shared staff and EUA appoints the Director of the IEP Secretariat.

Despite the panel's view that no benefits would come from legally separating the two entities, the Register Committee considered that IEP continues to be part of EUA and, as such, its organisational independence continues to be constrained by the close link and dependency in both legal and practical terms, even if less so than at the time of the previous review.

The Committee concurred with the panel's analysis that IEP operates and undertakes its evaluations independently and that the Steering Committee has full responsibilities for the operations of IEP and its evaluation results. The Committee thus considered that the constrained organisational independence bears a residual risk of a perceived lack of independence, elements of which should be closely considered in IEP's next renewal of inclusion.

The Register Committee concluded that the flag has been partially addressed given the steps taken in further separating IEP from EUA,

while the constraints to its organisational independence discussed above remain.

**The Register Committee therefore could not follow the panel's conclusion of compliance and considered that IEP complies only partially with ESG 3.3.**

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

### Conclusion:

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

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

10. The Register Committee considered that IEP only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that IEP continues to comply substantially with the ESG as a whole.
11. The Register Committee therefore renewed IEP's inclusion on the Register. IEP's renewed inclusion shall be valid until 29/02/2024<sup>1</sup>.
12. The Register Committee further underlined that IEP is expected to address the issues mentioned appropriately and to resolve them at the

<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

earliest opportunity as well as to inform EQAR through Substantive Change Reports where required.

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