

## Substantive Change Report by SKVC - Centre for Quality Assessment in Higher Education

Register Committee

Decision of:	13/06/2018
Report received on:	09/05/2018
Agency registered since:	18/11/2010
Last external review report:	21/07/2017
Registration until:	28/02/2022
Absented themselves from decision-making:	Jacques Lanarès
Attachments:	<a href="#">Substantive Change Report by SKVC, 01/04/2020</a> <a href="#">Statement SKVC re. complaints procedure, 28/04/2020</a>

Ref. C26

Ver. 1.0

Date 2020-04-24

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1. The Register Committee considered the Substantive Change Report of 01/04/2020.
2. The Register Committee took note of a number of substantive changes in the regular evaluations carried out by SKVC, in particular the (a) replacement of (single) study programme evaluations with the evaluation of study programmes in clusters ("**evaluation of study fields**") and the (b) **renewal of the institutional reviews**.
3. SKVC explained that the evaluations cycle will now be changed from a six-year cycle to an evaluation once in seven years. An interim accreditation of three years will remain in place for cases where not all conditions are fulfilled. For all evaluations the decision-making has been changed from a 4-point scale to a 5-point scale.
4. The Committee noted that the changes were intended to increase the quality of higher education provision and reduce the evaluation fatigue with the repetition of the previous procedures. The agency also argued that a reduced number of evaluations would reduce the overall workload of the agency.
5. With regard to the new procedure **(a) evaluation of study fields** the Register Committee noted that the activity is based on the previous form of evaluation of (single) study programmes. SKVC added that the evaluation of study fields gives more clear guidance to quantitative and qualitative data and compared to the previous procedure there is an increase focus on *ESG 1.4 Student admission, progression and certification*.
6. While the Committee finds reassuring the agency's statement that there is a continuity between the criteria that were used in the evaluation of

single running study programmes (ex-post) and the new criteria for the evaluation of study fields (ex-post), which are based on ESG 1.1-1.10, the **Register Committee nevertheless underlined that a mapping of the new criteria against the ESG should be prepared by SKVC for its next external review (ESG 2.1).**

7. In developing the procedure SKVC stated that it had frequently consulted the Ministry, higher education institutions, students and other interested parties, including the Research Council of Lithuania (ESG 2.2).
8. The Committee noted and welcomed the involvement of students in the institutional self-evaluation process.
9. While the implementation of the evaluation procedure remained largely the same i.e. a self-assessment, a site visit, an evaluation report and follow-up, the Register Committee took note that SKVC revised its follow-up procedures by introducing a yearly monitoring looking into how HEIs are addressing shortcomings and how HEIs are following up on the recommendations of experts from its previous review. (ESG 2.3)
10. Responding to the health and safety considerations caused by the COVID-2019 pandemic, SKVC explained that the site-visits will be temporarily replaced with video-conferences (ESG 2.3). Under the current circumstances the Register Committee finds this adjustment appropriate.
11. The Committee took note of the changes in the selection of experts intended to offer more clarity on how experts should work and acknowledged SKVC's plans to move towards the remote training of expert while the lockdown restrictions due to the COVID-19 are in place (ESG 2.4). The Register Committee finds this adjustment appropriate.
12. The Committee noted that SKVC introduced a threshold indicator on research for all higher education institutions carrying out Master level studies. The threshold is intended to ensure that teaching is based on research and development (or artistic) activities within that institution. The criterion is monitored 15 months prior to the scheduled external evaluation. If universities fail to satisfy this requirement they receive a negative accreditation decision (ESG 2.5).
13. Considering the publication of reports, the Register Committee noted that SKVC will continue to publish all reports, both positive and negative (ESG 2.6).
14. The Committee welcomed the amendment of regulations concerning appeals (Regulations of the Appeals Commission for Evaluation of Studies) which now refers to SKVC's renewed activities (ESG 2.7). The Committee further underlined that SKVC is expected to develop a complaints procedure to allow higher education institutions the possibility to raise issues of concerns regarding the conduct of the process or with those carrying it out (see Register Committee renewal decision of 2017).

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15. The Register Committee noted SKVC's plans for a yearly monitoring of its study fields (by cycle, by study year) following a number of indicators, that may lead SKVC (in case significant change is identified in at least three study fields) to initiate an extraordinary external evaluation of the study fields (to be finally determined by the Ministry). (ESG 3.4)
16. With regard to the new procedure **(B) institutional evaluations**, the Register Committee understood that while the reviews remain the prerogative of the agency, that the national regulation concerning institutional review procedures are now under the purview of the responsible Ministry and no longer under the responsibility of the Government. The Ministry may thus initiate the institutional review of all 37 Lithuanian higher education institutions. (ESG 2.2, ESG 3.3)
17. The Register Committee noted that SKVC revised its methodology adding a stronger focus to strategic management, internal quality assurance, and internationalisation. In the renewed procedure SKVC introduced 10 indicators and 34 criteria as part of the four evaluation areas that will be assessed in its reviews (ESG 2.1). **The Register Committee underlined that a mapping of the new criteria against the ESG should be prepared by SKVC before its next external review (ESG 2.1).**
18. One further adjustment to SKVC's institutional evaluations is the time allocated for the site-visits (ESG 2.3). SKVC explained that the reviews will now last from 2 to 4 days (except during the quarantine period, which will be done remotely), depending on the size and profile of the institution, compared to the 1 to 3 days which was previously the case.
19. The Register Committee also noted that SKVC intends to roll out the next round of institutional evaluations between 2021 and 2024 (ESG 2.5, ESG 3.1).
20. In considering the additional changes affecting the other areas of SKVC's work, the Register Committee took note and welcomed the new framework allowing **new joint study programmes to be evaluated using the European Approach for the Quality Assurance of Joint Programmes.**
21. The Register Committee also noted the new adopted regulation (as of 12 February 2020) that will allow foreign higher education institutions who are unable to carry out their activities in their country of origin - due to restrictions on academic freedom and institutional autonomy - to apply for the status of "higher education institution in exile", within Lithuania. The Register Committee noted that SKVC is currently preparing the methodology for such applications.
22. The Register Committee underlined that if the activity of SKVC in assessing the application for 'higher education institutions in exile' relates to processes using an expert or peer review methodology, addressing the quality dimensions described in Part 1 of the ESG, resulting in an official report, than such activity would be within the

scope of the ESG and that SKVC is thus expected to prepare a change report addressing this activity.

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## STUDIJŲ KOKYBĖS VERTINIMO CENTRAS CENTRE FOR QUALITY ASSESSMENT IN HIGHER EDUCATION

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European Quality Assurance Register for Higher Education (EQAR)  
Register Committee  
[info@eqar.eu](mailto:info@eqar.eu)

31 March, 2020 No. S-315

### REGARDING SUBSTANTIVE CHANGES IN SKVC'S WORK

Dear colleagues,

We hereby inform you about the substantive changes in work of the Centre for Quality Assessment in Higher Education (hereafter – SKVC).

Notably, changes do not involve a merger, change of organisational identity of SKVC as a registered agency or our structure, but rather the external quality assurance activities implemented by SKVC. Legislation guiding the below described changes is already adopted, a renewed process of evaluation of new study programmes (*ex-ante*) is already in place, a new yearly monitoring of HEIs has already started. We are preparing for actual implementation of one renewed procedure (institutional review of higher education institutions (HEIs), and one new procedure (evaluation of study fields which replaced evaluation of single study programmes). To the best of our judgement, we remain fully and even better in line with expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereafter – ESG).

#### **i. Purposes and development of the activity, involvement of stakeholders (ESG 2.2)**

The ultimate purposes of our activities remain the same as during our last external review in 2017, they are defined by the Law on Higher Education and Research (2016), which has not been amended in this respect. Namely, they are: to determine the quality of the performance of a higher education institution (hereafter – HEI) based on the findings of the external review/evaluation, to create prerequisites for improvement of the performance of an HEI, to promote quality culture, and to inform founders, academic community and the society at large about the quality of higher education.

There are changes introduced in the scope of external quality assurance procedures, their regulation, accreditation terms and grading of evaluation areas that lead to the accreditation decision. Most of these (except for grading which is a minor issue and does not fall under the purview of the Law) were foreseen by the above mentioned Law already in 2016, however, debates over practical implementation took time and drafting of legislation required several iterations because of difficulty to reach the agreement between the parties involved. Changes are intended to help increase quality of higher education provision and provide a fresh stimulus to institutions, as it is known that with time effectiveness of the same external quality assurance approach starts to fade away.

Firstly, we are switching from evaluation of single running study programmes (*ex-post*) to evaluation of clusters of study programmes grouped by study fields (*ex-post*), the new approach is called “Evaluation of Study Fields”. The new procedure is developed on the basis of the previously existing one, which was subject to scrutiny under the last external review of SKVC. A new description of the procedure was approved by the order of the Minister of Education, Science and Research No. V-835 of 17 July 2019 (amended on 20 December 2019). SKVC’s methodologies on evaluation of study fields and the renewed methodology for new study programmes (*ex-ante*) were approved by the order No. V-149 by Director of SKVC, issued on 31 December 2019. By the same order, the plan of study field evaluations for the period between the second half of 2020 and 2025 was announced. In practice drafting of the procedure (by the Ministry) and methodologies (by SKVC) went in parallel, in frequent consultations between the Ministry, SKVC, higher education institutions, students and other interested parties, including the Research Council of Lithuania from mid-2018.

Secondly, following provisions of the new procedure on evaluation of study fields, a threshold indicator on research (arts) for all universities (foreseen to come into force from 2025), carrying Master level studies, is introduced by legislation. This is completely new to the system. The purpose is to make sure that teaching is based on research and development (artistic activities) within that institution (which has always been a requirement by the Law, and now enforcement of it is strengthened), that HEIs have necessary capacities to engage in provision of second cycle studies, and that resources for external evaluation are not wasted in case institutions have weak capacities and would be likely to fail in the external evaluation procedure. SKVC is meant to monitor how institutions meet this criterion 15 months prior to the scheduled external evaluation of a relevant study field, and in the event universities fail to satisfy the requirements, they are denied external evaluation of the relevant study field and non-accreditation decisions will be issued. Till the date this threshold indicator on research (arts) comes into force, HEIs have time to adapt to the raised expectations. Meantime, greater attention is devoted to the synergy between provision of studies and research (artistic activities) carried out by the institution in the evaluation of study fields, renewed evaluation of new study programmes and also renewed institutional review of HEIs.

Under the new framework, there is greater alignment between *ex-ante* evaluation and evaluation of new study programmes with *ex-post* evaluation and accreditation study fields, where accreditation results of the latter determine the freedom of initiative and the burden on institutions in the former. In case of negative decision on a proposal for a new study programme, an HEI can re-submit the improved application not earlier than in a year. What is novelty, evaluation of new study programmes can be done using the European Approach towards joint study programmes.

Similar to earlier provisions, evaluation of both new study programmes and of study fields can be performed by SKVC or another quality assurance agency, listed on EQAR, as per HEI’s choice.

Thirdly, in addition to the above mentioned procedures, yearly monitoring of seven indicators in study fields to be done by SKVC was introduced. This monitoring is on the basis of official data in the state registers on students, teachers, and management of education, owned by the Ministry, also data provided by Educational Exchanges Support Foundation, and the Association for Common Admission into Higher Education. For that purpose, SKVC receives information from the National Education Agency, which is a public body under the Ministry, and in charge of state registers in education and which processes statistical data. SKVC is expected to publish report on the monitoring of indicators for each study field (by cycle, by study year) on its website and to submit it to the Ministry by the end of 1<sup>st</sup> quarter each year, starting 2020. After analyzing the data and finding a significant change (at least 30% or more) in at least three study field monitoring indicators within the institution over the past 3 years, SKVC may, after consideration of an institutional

explanation to the situation, initiate an extraordinary external evaluation of the study field, to be finally determined by the Ministry.

Fourthly, the institutional reviews procedure, instead of being regulated by the Government is now delegated to be regulated by the Ministry, which issued an order No. V-1529 of 19 December 2019. Correspondingly, SKVC revised its institutional review methodology, approved by the order No. V-32 by Director of SKVC, on 9 March 2020. The Ministry has a prerogative to initiate institutional reviews of all 37 Lithuanian HEIs, thus, a plan encompassing the period of 2021-2024 was issued on 5 March 2020, order No. V-329. Development of both the Ministerial procedure and SKVC methodology went in parallel.

The procedure is revamped on the basis of the previous institutional review, which was subject to external review of SKVC in 2017. Strengthened attention is given to strategic management, internal quality assurance, and internationalization. While it was expected previously that students would be involved in institutional self-evaluation process, currently, this expectation is clearly put on paper; communication between SKVC and the institutional student union regarding the visit of experts is also fixed.

Similar to earlier provisions, institutional review remains a sole prerogative of SKVC as the national quality assurance agency.

In addition, there is a special legal regulation of the working conditions of foreign HEIs which are established in Lithuania as a safe hub for provision of quality education in the event such functioning of an institution in the country of origin is difficult or impossible because of imposed restrictions of academic freedom and institutional autonomy. Such institutions, when established in Lithuania observing Lithuanian requirements and procedures, may obtain a status of “the higher education institution in exile”, the latter conferred by the decision of the Government upon a relevant motion from the Ministry of Foreign Affairs. This is regulated by the amended Resolution of the Government No. 113 issued on 12 February 2020 (amends the earlier version of 1 March 2017). A methodology of SKVC to implement the above mentioned provisions is currently being drafted.

Stakeholders were involved and consulted both formally and informally in the development of all processes.

In all procedures, we have shifted from six-year accreditation cycle to seven-year accreditation cycle for economic purposes, in order to ease the evaluation fatigue for HEIs and to make the workload of SKVC as external quality assurance agency more manageable. An interim accreditation of three years remains as an option in cases when at least one evaluation area is judged as meeting requirements only satisfactory, a study field can receive a three year accreditation only once. For the decision-making, an evaluation scale was changed from 4-point scale to 5-point scale.

One significant novelty is that SKVC commissioned creation of the mobile application, called the National Student Survey. It is expected that we start using NSS this year already. This way, feedback from students regarding quality of their studies will be directly gathered by ourselves as external quality assurance agency to inform the panel of experts and be considered in the final decision making as an independent source of opinions. In cases, when gathered feedback will not be statistically significant, opinion of students, gathered and summarized by HEIs will still be used.

**ii. Criteria used, how they were developed, measures implemented to ensure consistency, how ESG 1.1 – 1.10 are reflected in the criteria (ESG 2.1 & 2.5)**

There is continuity between the criteria that were used in evaluation of single running study programmes (*ex-post*) and current criteria for evaluation of study fields (*ex-post*), they remain based on ESG 1.1-1.10.

Earlier, evaluation of new study programmes was based on scrutiny of six areas as follows: 1) programme objectives and expected learning outcomes, 2) programme structure, 3) staff, 4) material resources, 5) study process and its evaluation, and 6) program management. Compared to the previous methodology, the number of evaluation areas under the renewed procedure is expanded. There were altogether 23 criteria in the above mentioned areas. Now analysis will encompass seven evaluation areas, to be precise: 1) study aims, intended learning outcomes and curriculum; 2) linkages between research and development (artistic activities and experience) with studies; 3) student admission and support; 4) learning, student achievements and careers of graduates; 5) teaching staff; 6) material resources; 7) quality management and publicity. Currently, there are 22 criteria in the seven areas, a more clear guidance is given which quantitative and qualitative data should be provided and analysed. Greater attention is devoted to ESG 1.4, also information provision and graduate career tracking.

Evaluation of single running study programmes (*ex-post*) used to include analysis of six evaluation areas as follows: 1) programme aims and learning outcomes; 2) curriculum design; 3) teaching staff; 4) facilities and learning resources; 5) study process and students' performance assessment; 6) programme management. There were 32 criteria. Under the new procedure of evaluation of study fields, seven evaluation areas (1) Aims of study, learning outcomes and curricula; 2) linkages between research (arts) and provision of study; 3) student admission and support; 4) learning, student progression and careers of graduates; 5) teaching staff; 6) material resources; 7) quality management of studies and publicity) with aims under each of it are established, total 31 indicator listed, a more clear guidance is given which quantitative and qualitative data should be provided and analysed, altogether 66 points.

As to institutional reviews, previously, there were four evaluation areas established as follows: 1) strategic management; 2) academic studies and life-long learning; 3) research and/or art activities; 4) impact on regional and national development. There were 30 criteria, the list of possible annexes was not regulated and sometimes institutions were submitting too many annexes of two large size. In the renewed procedure, four evaluation areas remain, however, the focus is slightly shifted and now encompasses the following: 1) management; 2) quality assurance; 3) studies and research and development (artistic) activities; 4) impact on regional and national development. There are now 10 indicators and 34 criteria for review, and a list of 8 annexes to be provided by the institution.

In case of all three procedures, the decision making process of SKVC remains the same as it used to be. Every evaluation report by the expert team is to be reviewed by the SKVC coordinator, a draft is sent to the HEI to comment on factual errors, and after corrections, if applicable, the report is finalised. The report is then submitted to the one relevant advisory body of SKVC, either a commission on studies – in case of evaluation of new study programmes or study fields – or a commission on institutions, in case of institutional review of HEIs – for their consideration. Upon receipt of advice (approval of reports in terms of their clarity, objectivity, exhaustiveness) by the commission concerned, the SKVC director takes an accreditation decision. Observing the above mentioned changes in methodologies, mandates of relevant SKVC advisory commissions were amended (order No. V-104 of 10 October 2019 regarding Regulations of the Commission for Evaluation of Studies; order No. V-105 of 10 October 2019 regarding Regulations of the Appeals Commission for Evaluation of Studies; order No. V-2 of 8 January 2020 regarding Regulations of the Commission for Higher Education Institutions' Review).



**iii. Review team composition, selection, appointment and training of reviewers (ESG 2.4)**

There is greater clarity on how experts should work, relevant provisions are now consolidated into a new document; while the procedure for expert selection was also renewed and now contains more details. Both were approved by the above mentioned SKVC order No. V-149 of 31 December 2019.

There are no other major changes in this area, except for visits, which under conditions of quarantine (cf. iv.) will be managed remotely, similarly, expert training prior to the visits will also be done remotely, using Zoom Pro programme for video meetings.

**iv. Site visits (ESG 2.3)**

Procedures in respect to the site visits in the new framework for evaluation of new study programmes, for evaluation of study fields, and for institutional review, are basically the same.

All studies of one field conducted in all Lithuanian HEIs shall be evaluated at the same time, yet for some study fields, where there are numerous programmes registered, one panel of experts may not be enough to cope with the task.

In case of institutional review of HEIs, visits are prolonged. It is now stipulated, that depending upon the size and profile of an institution, the visit shall last 2–4 days. Previously it used to be 1–3 days, yet in practice there was no such a visit which would last just one day. Therefore, stipulations on paper and practice are now better aligned.

Currently, exceptions will be made because of quarantine measures imposed by the Government in the entire public sector and education institutions in observance of health and safety considerations as a response to the Covid-2019 pandemic. To be precise, till now, never a site visit would be performed remotely, the expert panel would always visit the institution in person in all procedures (for new study programmes in cases institutions did not qualify for simplified procedure and had to undergo the full evaluation with experts, for running study programmes, for institutional review). Starting April, visits, when health and safety situation does not allow them, upon agreement between SKVC and the HEI, shall take place using videoconference facilities. HEIs are encouraged to provide recorded evidence on their infrastructure and resources for teaching and learning. This will be regulated by the relevant order of the Director of SKVC to be issued this week. It is intended to keep remote visiting as an exception, rather than as a rule, and once it is safe again, to return to normal physical on-site visits.

**v. Publication of reports (ESG 2.6)**

There are no major changes in this respect: all reports, both positive and negative, are and will be published. However, technical improvements for publicity are planned in terms of DEQAR project.

**vi. Follow-up (ESG 2.3)**

Under the new framework for study field evaluation, attention to follow-up activities, which fall primarily as a responsibility of HEIs, is strengthened. The purposes is to encourage HEIs implement the suggestions by experts made during the evaluation, to improve the quality of studies, as well as to ensure that the shortcomings identified during the evaluation are eliminated. The role of SKVC becomes more prominent with yearly monitoring, which is seen as a tool to encourage institutions take swift actions in service for the above stated purposes.

While institutions were encouraged to publish their plans for improvement under the previous institutional review procedure and would do voluntarily, following the renewed methodology, they are now obliged to publish follow-up reports and to submit them for consideration of SKVC.

**vii. Appeals system (ESG 2.7)**

Appeals system remains basically the same.

**viii. Embedding in thematic analyses and internal quality assurance of the agency (ESG 3.4 & 3.6)**

There are no major changes in this respect.

We remain open to provide any other information or documents needed. Thank you for your attention and consideration.

Sincerely yours,  
Director

Almantas Šerpatauskas

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**STUDIJŲ KOKYBĖS VERTINIMO CENTRAS**  
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European Quality Assurance Register for Higher Education  
(EQAR)  
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28 April, 2020 No. S-

Regarding 24 April 2020 Ref. C26

**REGARDING COMPLAINTS PROCEDURE AT SKVC**

Dear Karl,  
Dear Colin,

Thank you for the Register Committee's decision on the substantive changes report supplied by the Centre for Quality Assessment in Higher Education (hereafter – SKVC). Using the opportunity, we would like to provide additional information regarding complaints procedure at SKVC in relation to us meeting the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereafter – ESG), specifically ESG 2.7.

To remind, the ESG 2.7 under the “standard” requires as follows: “Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.”. Under ESG 2.7 “Guidelines” the relevant passage reads as follows: “A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.”

It is worth to underscore, that it has always been a possibility for higher education institutions (HEIs), upon receipt of information about the members of the expert panel, to submit a grounded request to replace any member of the team, or lodge a complaint in relation to conduct of the panel of experts of SKVC staff members. Such a request must be based on facts, proving the potential conflict of interests of the expert, non-objectivity of the expert, explain the circumstances of unethical or unprofessional behaviour etc. This was done following the requirements and principles of the public administration that apply to work of SKVC as a civil service organisation in line with the Law on Public Administration (issued in 1999, latest amendments made in 2019) and the resolution No. 875 issued by the Government on 22 August 2007 (with subsequent amendments), containing detailed rules regarding service provision to legal and natural persons, including granting requests and scrutiny of complaints.

To date, this opportunity was comparatively rarely used by the HEIs, on average – less than 5 requests annually. Until 2019, in all such cases, *Ad hoc* commissions comprised of the Centre's employees had been formed for handling such requests, and also for scrutiny of the cases of potentially unethical behaviour of the panel members before, during or after the evaluation procedure.

Since January 2019, there is a permanent internal Commission established that scrutinizes both types of complaints. The complaint needs to be answered within 20 working days since it was received. An HEI receives a detailed reasoning of a decision. The same commission deals with such requests for new programmes, evaluation of study fields, and institutional reviews, and gives advice to the Director, who makes final decisions that are communicated back to institutions.

A possibility to complain is foreseen in the relevant methodologies, to be exact:

- for evaluation of new study programmes (ex-ante) – see points 17, 18 (the full text of the methodology available in English at [https://www.skvc.lt/uploads/lawacts/docs/351\\_b933098e8f5390a9c95ec38c8e224be5.pdf](https://www.skvc.lt/uploads/lawacts/docs/351_b933098e8f5390a9c95ec38c8e224be5.pdf));
- for external evaluation of study fields (ex-post) – see point 27 (the full text of the methodology available in English at [https://www.skvc.lt/uploads/lawacts/docs/352\\_276cb6e9466689990e14f7aee2ae5a1c.pdf](https://www.skvc.lt/uploads/lawacts/docs/352_276cb6e9466689990e14f7aee2ae5a1c.pdf));
- for Institutional Review of Higher Education Institution (ex-post) – see point 25 (the full text of the methodology available in English at [https://www.skvc.lt/uploads/lawacts/docs/354\\_f672cc62fbbcff9312ef570c1663ad9a.docx](https://www.skvc.lt/uploads/lawacts/docs/354_f672cc62fbbcff9312ef570c1663ad9a.docx)).

The relevant provisions on the possibility for HEIs to request replacement of an expert are described in the Experts Selection Procedure, issued by the order No. V-149 of the Director of SKVC on 31 December 2019 (please see points 15, 16). This Procedure also covers the cases when we as an external quality assurance agency take appropriate actions in the event an expert fails to adhere to the services agreement with SKVC, including undeclared apparent conflicts of interests that emerge during the evaluation process or any other inappropriate behaviour during evaluation processes (see points 40 and 41) (the full text available in English at [https://www.skvc.lt/uploads/lawacts/docs/349\\_3c24730602f3906bb3af174e1e94badb.pdf](https://www.skvc.lt/uploads/lawacts/docs/349_3c24730602f3906bb3af174e1e94badb.pdf)). Experts' code of conduct and other circumstances of their work are covered in the Procedure of Organisation of Experts' Work approved by the same order of SKVC mentioned above, the full text available in English at [https://www.skvc.lt/uploads/lawacts/docs/350\\_7ad31c66206fe9e6699d1cbf98150303.pdf](https://www.skvc.lt/uploads/lawacts/docs/350_7ad31c66206fe9e6699d1cbf98150303.pdf)

Finally, the Centre improved the transparency of all the complaints and appeals procedures, therefore all the information about the complaints and appeals for all evaluation processes (requests to replace experts, appeal procedures, experts' misconduct, etc.) is publicly available on the webpage next to information on the relevant type of evaluation procedure. Please see an example of guidance in original (Lithuanian) at <https://www.skvc.lt/default/lt/kokybes-uztikrinimas/kvsp/kvsp-apeliacijos>.

To complement, there is a general information on possibility for students to complain regarding quality of higher education provision (regarding teaching, learning environment and resources) via the on-line form in the SKVC webpage, where responsibility of higher education institutions, the Academic Ombudsmen Institution, and student unions are explained. Please see guidance to students in original (Lithuanian) at

<https://www.skvc.lt/default/lt/kokybes-uztikrinimas/skundai-ir-pranesimai-del-studiju-kokybes>.

To summarise, we believe, SKVC fully satisfies expectations of ESG 2.7 regarding complaints.

In addition to the stated above, HEIs have a possibility to raise any type of concerns (regarding conduct of experts, or evaluation coordinator of SKVC etc.) in the on-line feedback forms provided after each external evaluation procedure. This feedback is gathered and analysed regularly, corrective actions taken as needed. This process falls under ESG 3.6.

Please do not hesitate to contact us in case further clarifications are needed. Thank you for your attention and consideration.

Sincerely yours,  
Director

Almantas Šerpatauskas

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