

**Approval of the Application
by Independent Agency for Quality Assurance in Education
(IQAA)
for Renewal of Inclusion on the Register**

Register Committee
25/10/2022

Ref. RC37/A106
Ver. 1.0
Date 2022-11-03
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Application of:	2020-12-10
Agency registered since:	2017-02-01
External review report of:	2022-04-27
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Maria-Giovanna Lotito, Nuria Comet, Tatjana Volkova, Tue Vinther-Jørgensen
Decision of:	2022-10-25
Registration until:	2027-04-30
Absented themselves from decision-making:	n/a
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 2020-12-21 2. External Review Report (an external file), 2022-04-27 3. Clarification by the Review Panel, 19/09/22

1. The application of 2020-12-10 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2020-12-21.
3. The Register Committee considered the external review report of 2022-04-27 on the compliance of IQAA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel.

Analysis:

5. In considering IQAA's compliance with the ESG, the Register Committee took into account the activities: *Institutional and programme accreditation of higher education institutions* and *Institutional and programme accreditation of research institutes*.

6. The activities *Accreditation of TVET institutions* and *Accreditation of continuous education centres* are not within the scope of the ESG and, thus, not pertinent to the application for renewal of the registration on the Register.

7. The Register Committee found that the report provides sufficient evidence and analysis on IQAA's level of compliance with the ESG.

8. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.1 – Consideration of internal quality assurance

9. In its previous decision, the Committee decided that IQAA complies only partially with the standard due to the lack of consideration of effectiveness of the internal QA processes in its institutional and, now ceased, specialised accreditation procedures.

10. The Committee learned that the agency has changed its accreditation criteria and improved their link to the assessment of the internal quality assurance systems of the higher education institutions; the detailed mapping presented in the review report and the analysis by the panel of IQAA's reports show that IQAA's criteria now cover all the standards from the ESG Part 1.

11. The Committee welcomed the improvements made by the agency and concurred with the panel's conclusion that IQAA is now compliant with the standard 2.1.

ESG 2.2 – Designing methodologies fit for purpose

12. When IQAA was admitted to the Register, the Committee raised a concern on the clarity and the regularity in the review of methodologies. The panel noted that now, in practice, the agency reviews and develops the standards and guidelines in a "targeted way", involving different stakeholders.

13. The Committee welcomed the efforts made by the agency and found that IQAA has addressed the major concerns. While the Committee concluded that the agency is now compliant with the standard, it highlighted the panel's recommendation that the agency would benefit from formally documenting its processes for designing and updating methodologies.

ESG 2.3 – implementing process

14. IQAA requests that all institutions that went through a review submit a follow up report on the improvements they implemented. IQAA then selects institutions that are visited by a panel to assess in more detail the fulfilment of the recommendations given in the final decision.

15. From the external review report, the Register Committee learned it is not always clear which criteria are used for determining which institutions

are visited by a panel and what is the outcome of the visit. The Committee therefore sought further information from the panel.

16. In its response (of 19/09/2022), the panel explained that, in practice, only higher education institutions with a lot of recommendations for improvement get chosen for a site visit. After such a site visit, the impression of the panel was that the agency would always provide feedback (though unclear in which form – oral or written). In the feedback, the agency comments on the improvements made by the HEI, but does not provide consultancy services.

17. The Register committee underlined the panel’s recommendation that the regulations on the follow-up procedures should be clearer and more transparent, especially the guidelines on the expected outcomes of the site-visit and the consequences for the higher education institutions that have not implemented the earlier recommendations.

ESG 2.5 – Criteria for outcomes

18. The Register Committee noted that – in order to improve consistency – IQAA has restructured and documented the requirements for each of the four compliance levels in the guidelines aimed at panel experts and members of the accreditation decision-making body. In the panel’s view, the criteria are now interpreted in a consistent manner and the decisions are better harmonised. The criteria, though well known by the external experts, are not published.

19. The Committee welcomed the efforts made by the agency in adding clarity in the decision making process. It, however, considered the lack of publicly available criteria a considerable critical point in the work of the agency. The Committee found that this could potentially create confusion for the higher education institutions and other stakeholders in regard to what is required in the external quality assurance processes. Following this, the Committee was unable to concur with panel’s conclusion and found that the agency is only partially compliant with the standard.

ESG 2.6 – Reporting

20. The Register Committee learned that IQAA now publishes in full the decisions from institutional and programme accreditations, including the negative ones. The Committee, however, noted that even though **the bulk of reports is public, this is not the case for all of them - the reports from the initial accreditation and the post-accreditation monitoring are still not published. Considering this shortcoming, the Committee could not agree with panel’s conclusion and found that the agency remains only partially compliant with the standard.**

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ESG 2.7 – Complaints and appeals

21. In the panel’s view, the agency’s complaints and appeals processes are well established. The higher education institutions, however, can only appeal decisions with a negative outcome.

22. The panel noted that IQAA’s complaint’s process is not always clear – the regulations only describe the outcomes in cases when higher education institutions contest the behaviour of an expert, but not in the cases when factual errors in the process are noted.

23. The Committee underlined the panel’s recommendation that the agency should enable higher education institutions to appeal the decision irrespective of the final outcome and provide further clarity in the complaints procedure. **Due to these shortcomings, the Committee could not concur with panel’s conclusion and found the agency to be only partially compliant with the standard.**

ESG 3.3 – Independence

24. The panel noted that the founder of the agency, acting as a President, has a strong executive role - they nominate and appoint members of the Supervisory Board (and is a board member), the Appeals Commission, the Complaints Commission and the experts councils, recruits the staff members and attends the meetings of the Accreditation Council. The panel further suggested that IQAA should consider ways to distribute the executive powers to other bodies in order to become less dependent on the president as a person (p. 46 of the external review report).

25. The Committee found that the current arrangements, in which one single actor – namely the founder and president – could use their controlling stake over the agency in several regards, represents a substantial risk of an infringement on the independence of the agency, see interpretation no. 18 in the Policy on the Use and Interpretation of the ESG. **The Register Committee therefore did not concur with panel’s conclusion but found the agency only partially compliant with the standard.**

ESG 3.4 – Thematic analysis

26. The Register Committee learned that IQAA has published several thematic analyses since the last review. The panel, however, could not see any formal plan for drafting and publishing these analyses. The Committee underlined the panel’s recommendation and found that the agency could benefit from documenting its ideas and plans for producing analyses.

27. **The Committee, however, considered that despite the absence of a more formal planning the agency has developed a practice and demonstrated a clear vision for conducting analyses based on its EQA processes. The Register Committee therefore did not concur with the panel’s conclusion, but found that the agency is compliant with standard 3.4.**

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

Conclusion:

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

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

30. **The Register Committee considered that IQAA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that IQAA continues to comply substantially with the ESG as a whole.**

31. **The Register Committee therefore renewed IQAA's inclusion on the Register. IQAA's renewed inclusion shall be valid until 2027-04-30¹.**

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

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

External review of the Independent Agency for Quality Assurance in Education (IQAA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN IQAA, ENQA AND EQAR **27 November 2020**

I. Background and context

The Independent Agency for Quality Assurance in Education (IQAA) was established in 2008 as the first independent accreditation agency in Kazakhstan. The Non-Governmental Institution «Independent Agency for Quality Assurance in Education» has the legal status as a non-governmental, non-profit organisation. IQAA's mission is to contribute to improving the quality of educational institutions, and to increase their competitiveness at national and international levels. IQAA conducts accreditation of higher education institutions and study programmes, organises trainings and conferences in the field of quality assurance in higher education, publishes reports and provides information about quality assurance in higher education to stakeholders in Kazakhstan and abroad.

IQAA's activities:

- Organisation and carrying out of institutional and programme accreditation of higher education institutions and research institutes;
- Organisation and carrying out of institutional and programme accreditation of TVET institutions;
- Development of standards and criteria, guides and other relevant documents for institutional and programme accreditation of higher education institutions and research institutes;
- Development of standards and criteria, guides and other relevant documents for institutional and programme accreditation of TVET institutions;
- Organisation of training courses, workshops, seminars, forums and conferences in the fields of quality assurance in higher education, teaching and learning, and management of higher education institutions;
- Publishing of thematic analyses and reports about quality assurance in higher education;
- Informational and methodical support of higher education institutions and provision of relevant information about quality assurance in higher education to stakeholders, including through its website (<https://iqaa.kz/>);
- Participation in the development of legislation on quality assurance in higher education and other related issues in higher education, which is undertaken by the legislative authorities.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which IQAA fulfils the requirements of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of IQAA should be reconfirmed and to EQAR to support IQAA's application to the register.

2.1 Activities of IQAA within the scope of the ESG

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

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

- Institutional and programme accreditation of higher education institutions;
- Institutional and programme accreditation of research institutes.

Considering the renewal of IQAA's application to EQAR, the self-evaluation report and the external review report is expected to also cover issues where the Register Committee concluded in its last decision that the agency complied only partially with the ESG i.e. with ESG 2.1, ESG 2.2, ESG 2.5 and ESG 2.6.

Additionally, the review should also address:

- any organizational and operational changes in the activity of IQAA following the establishment of a Supervisory Board (see [decision on IQAA Change Report](#) of 30 April 2019);
- how IQAA ensures the separation of activities that fall within and outside the scope of the ESG, in particular referring to the i.e. 'accreditation of TVET institutions' and the 'accreditation of organizations for continuing education of adult', taking into account Annex 5 of the [Policy on the Use and Interpretation of the ESG](#)¹.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with *the Guidelines for ENQA Agency Reviews* and the requirements of *the EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation and agreement on the Terms of Reference for the review between IQAA, ENQA and EQAR;
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by IQAA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to IQAA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Decision making by the EQAR Register Committee on the agency's registration on EQAR;

¹ <https://www.eqar.eu/kb/official-documents/#use-and-interpretation-of-the-esg>

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

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Review Coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

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

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

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

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG parts 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the ENQA Board's membership decision letter and the instances of partial compliance noted in the previous EQAR Register Committee decision of inclusion/renewal. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which IQAA fulfils its tasks of external quality assurance and meets the ESG.

- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

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

The review panel will be assisted in a site visit by the ENQA Review Coordinator.

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

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each standard of parts 2 and 3 of the ESG. A draft will be first submitted to the ENQA Review Coordinator who will check the report for consistency, clarity and language, and it will be then submitted to IQAA usually within 10 weeks of the site visit for comment on factual accuracy. If IQAA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by IQAA and finalise and submit the document to ENQA.

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

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the consideration of the Register Committee of the agency's application to EQAR².

² See here: https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

For the purpose of applying for ENQA membership, IQAA is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which IQAA expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board together with the final evaluation report when deciding on the agency’s membership.

4. Follow-up process and publication of the report

IQAA will receive the expert panel’s report and publish it on its website once the ENQA Board has approved the report. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. As part of ENQA Agency Review follow-up activities, IQAA commits to react on the review recommendations and submit a follow-up report to the ENQA Board within the timeframe indicated in the Board’s decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board’s decision.

The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to IQAA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

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

The review report is used by the ENQA Board for the purpose of reaching a conclusion on whether IQAA can be reconfirmed as a member of ENQA. The report is also used as a basis for the Register Committee’s decision on the agency’s registration on EQAR. The review process is thus designed to serve these two purposes. However, the review report is to be considered final only after being approved by ENQA. Once submitted to ENQA and until it is approved by its Board, the report may not be used or relied upon by IQAA, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

For the purposes of EQAR registration, the agency will submit the review report (once approved by the ENQA Board) via email to EQAR before expiry of the agency’s registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, full curriculum vitae (CVs) of all review panel members and any other relevant documents to the application (i.e. annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency’s application at its Register Committee meeting in summer 2022.

6. Indicative schedule of the review

Agreement on Terms of Reference	November/December 2020
Appointment of review panel members	January 2021

Self-assessment completed	31 May 2021
Pre-screening of SAR by ENQA Review Coordinator	June 2021
Preparation of site visit schedule and indicative timetable	July 2021
Briefing of review panel members	August 2021
Review panel site visit	September 2021
Draft of evaluation report and submitting it to ENQA Review Coordinator for pre-screening	October 2021
Draft of evaluation report to IQAA	November 2021
Statement of IQAA to review panel if necessary	30 November 2021
Submission of final report to ENQA	December 2021
Consideration of the report by ENQA Board	February 2022
Publication of report	March 2022
EQAR Register Committee meeting	Summer 2022

Application by IQAA for Inclusion on the Register / Renewal of Registration

Clarification provided by the Panel

Date of the conversation:	2022-09-19
Panel members:	Tue Vinther-Jørgensen
Representative of EQAR:	Aleksandra Zhivkovikj

1. IQAA has submitted on 2020-12-10 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR). On 2022-06-09, IQAA submitted the external review panel's report of 2022-04-27.
2. From the external review report, the Register Committee learned that the follow up procedure has clearly defined elements (i.e. who is expected to submit a follow up report, what are the matters on which the report should elaborate and formation of a panel that pays site visit and checks how the recommendations are implemented), but also elements which are not always precise (i.e. which criteria are used for determining which institutions are visited by a panel and what is the outcome of the visit).
3. In order to prepare the deliberations of the Register Committee on IQAA' compliance with the ESG, EQAR contacted the Panel to clarify the nature of the follow up process. Further details are provided below:

ESG 2.3 – Implementing processes and ESG 3.1 – Activities, policy and processes for quality assurance

4. In panel's opinion, agency's follow up process is rather strict and demanding (i.e. even in cases of a positive decision, HEIs have to submit a follow up report every year). Following this, the agency receives large number of follow up reports per year. The impression of the panel was that that it is challenging for the staff team to prepare a feedback to every report, and that the staff team in most cases just checks the reports without giving any feedback to the institution.
5. While the selection process is not well defined, in practice, only HEIs with lot of recommendations for improvement get chosen for a site visit (made by a smaller panel). The selection is done internally. After the site visit, the impression of the panel was that the agency would always provide a feedback. For the panel, it was unclear in which form – orally or written - this feedback is provided. In the feedback, the agency comments on the improvements made by the HEI.

6. In panel's opinion, the follow up process does not involve consultancy elements.