

**Approval of the Application
by Canarian Agency for Quality Assessment and
Accreditation (ACCUEE)
for Inclusion on the Register**

Register Committee
2-3 March 2023

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Application of:	2021-11-09	
External review report of:	2022-10-26	Submitted: 2022-12-09
Type of review:	Full	
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)	
Review panel members:	Francisco Joaquin Jimenez Gonzalez, Maria Weber, Paolo Cherubini, Vanessa Duclos	
Decision of:	2023-03-03	
Registration until:	2027-10-31	
Absented themselves from decision-making:	none	
Attachments:	1. External Review Report, 2022-10-26 2. Applicant's statement on the report, 2022-12-20 3. Minuted clarification by the Review Panel, 2023-02-13	

1. The application of 2021-11-09 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2021-11-17.
3. The Register Committee considered the external review report of 2022-10-26 on the compliance of ACCUEE with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered the Monitoring Report submitted by the agency on 2022-12-20.
5. The Register Committee sought and received clarification from the review panel on 2023-02-13.

Analysis:

6. In considering ACCUEE's compliance with the ESG, the Register Committee took into account:

- *validation for the authorisation of university institutions*
- *programme validation for the authorisation of new programmes*
- *programme accreditation*
- *programme monitoring*

7. The following activities are not within the scope of the ESG and, thus, not pertinent to the application for inclusion on the Register:

- *evaluation of other education sectors*
- *teaching staff accreditation*
- *evaluation for the assignment of salary complements*

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

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

ESG 2.6 – Reporting

10. The Register Committee noted that the responsibility for the preparation of the external review reports for the monitoring and ex-post accreditation of study programmes is with the Technical Committees.

11. The Register Committee noted that the experts' site-visit reports were not part of the final external review report and they were only available for the analysis of the Technical Committees. The Register Committee could not understand why the experts reports (in the case of the monitoring and ex-post accreditation of study programmes) is not published as well and therefore asked the panel for further clarification.

12. The panel explained (see minuted clarification 2023-02-13) that the practice of having a committee develop these reports is common among all Spanish QA agencies and it ensures the consistency of reports.

13. The Register Committee further asked the panel to clarify the forms of factual and non-factual allegations made by institutions on the reports of the Technical Committees. The panel explained (see minuted clarification) that the allegations have always been focused on the technical part of the reports (factual comments). However, the panel added that the agency should clearly differentiate within its procedure that the allegations deal only with factual errors and do not address diverging views and opinions on the statements and assessments taken in the report.

14. While the Register Committee welcomed the use of a Technical Committee to ensure consistency, the Register Committee could not follow the reasoning of not including or separately publishing such reports (i.e. as

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an annex). The Register Committee underlined that it can be of interest for the public to know the basis on which the final reports are being developed. In particular, such information is important to ensure the transparency in the Technical Committee's decision making.

15. The Register Committee therefore could not follow the panel's conclusion on the compliance with the standard, but concluded that ACCUEE complies only partially with ESG 2.6.

ESG 2.7 – Complaints and appeals

16. The Register Committee noted that the agency defines three different processes for allegations, appeals and complaints.

17. The allegations (considered as a form of feedback opportunity for the institutions) are dealt with by the Technical Committees, who is also responsible for drafting the reports (see also under ESG 2.6).

18. The appeals and complaints procedures are defined by law and are under the legal competency of the Canary government.

19. The Committee noted, that ACCUEE's appeals and complaints policies are limited as the agency does not have its own appeals and complaints processes or a separate body in considering complaints or appeals.

20. The Committee considered that external quality assurance processes should always include an internal possibility to appeal and complain with the responsible body that carried out the review itself.

21. The Register Committee noted that ACCUEE intends to appoint an independent and permanent body, Guarantee Commission that will consider all appeals and complaints related to all procedures that are in the scope of the ESG.

22. The Register Committee welcomed ACCUEE's intention to set up a separate body to handle appeals and complaints, but the Committee underlined that such changes are yet to be implemented and to be reviewed. The Register Committee therefore concurred with the panel that ACCUEE only partially complies with ESG 2.7.

ESG 3.3 – Independence

23. In regards to organisational independence, the Register Committee noted that the Governing Board, the body responsible for the approval of accreditation methodologies and criteria, has a strong regional government representation, with one third of the members nominated by the regional ministry. The Committee further noted that the regional ministry is also responsible in appointing the president and vice-president of the Governing Board.

24. The Committee further noted that the regional government directly appoints the Director of the agency. The Committee found this problematic given the Director's responsibility in ensuring the independent operations of

the agency and in chairing all of the agency’s Technical Committees for ex-post accreditation of study programmes.

25. The Committee further noted that the agency is limited in its recruitment processes as this responsibility lies with the regional government (review report, p. 27).

26. **Given the close link to the regional government, the Committee shares the panel’s view that ACCUEE should (in consultation with the regional Government) amend the current processes regarding the appointment of the Director as well as the legal frameworks definition on the composition and the proportion of governmental members in the Governing Board and ensure the recruitment processes are under the competency of the agency.**

27. **The Register Committee welcomed ACCUEE’s plans for addressing the panel’s concerns, but the Committee underlined that these changes are yet to be fully enacted. The Register Committee therefore concurred with the panel that ACCUEE only partially complies with ESG 3.3.**

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 ACCUEE demonstrated compliance with the ESG (Parts 2 and 3) as follows:

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

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

31. The Register Committee therefore approved the application for ACCUEE's inclusion on the Register. ACCUEE's (inclusion 31/10/2027¹).

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

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

MONITORING REPORT

INTRODUCTION

The external review of the Agency, carried out by ENQA's panel of experts in June 2022, provided ACCUEE with a number of recommendations and proposals for improvement regarding compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015).

The Agency assumes that it should pay particular attention to the recommendations. However, actions for proposals for improvement are also included.

Both the recommendations and the proposals for improvement provided by the panel are classified by ESG and framed for their differentiation from the proposed action, in each case, by the ACCUEE.

JUDGEMENTS AND RECOMMENDATIONS

ESG 3.3:

1. The panel recommends ACCUEE to have an active role in initiating a review of the legal frameworks' definition on the composition and the proportion of governmental members in the GB and specifically the role of chair and vice-chair of the GB should be reconsidered to allow a higher level of independency from the Ministry.
2. The panel recommends ACCUEE's GB to issue its organisational rules for its work, appointment, and dismissal of its members, based on the legal framework.
3. The panel recommends ACCUEE to initiate a reflection with the regional Government on the current process in place regarding the appointment procedure of the director and its role and involvement in different bodies of the Agency.

Actions proposed by the ACCUEE:

The ACCUEE will urge the corresponding procedure for the approval by the Government of the Canary Islands of the modification of Decree 250/2017 in order to update, based on the recommendations of the ENQA panel, the following aspects:

1.- Composition of the Governing Council:

The proposed modification will include, among others, eliminating the figure of the vice-presidency and incorporating two people of recognised academic prestige in the university field who are proposed by the universities, incorporating a person proposed by the representative bodies of the teaching and research teaching staff of the Canarian public universities.

2.- Organisation, appointment and dismissal of the Governing Council:

Currently this information is in Decree 250/2017, in article 5 (The Governing Board), sections 4, 5, 6, 7, 8 and 9, as well as in article 7 (Regime of convocation, constitution and operation).

3.- Appointment of the ACCUEE's management:

The proposed amendment will include, among others, indicating the role of the Governing Council in the selection of the person to be proposed, establishing the requirements that this person must meet (both professional experience and knowledge in areas such as educational research, educational evaluation or quality assurance processes that are developed in the ACCUEE) and specifying the duration of the mandate, as well as the conditions for this.

ESG 2.1:

4. The panel recommends ACCUEE to take ESG part 1 into account following REACU's protocol as stated by the Agency for the future activities.

Actions proposed by the ACCUEE:

The ACCUEE, like the rest of the Spanish evaluation agencies, will adjust all its evaluation protocols to the proposals made within the scope of the REACU in 2022 and 2023, in order to comply with the new Royal Decrees. Furthermore, the protocols for the processes that ACCUEE will begin to develop when it is registered in EQAR (Verification and Modification of Official Degrees) are already approved within REACU and will be used by ACCUEE.

ESG 2.2:

5. The panel recommends ACCUEE to carefully analyse the overlapping between the different procedures and particularly linked to the two-steps ex-ante accreditation process leading to two different reports.

Actions proposed by the ACCUEE:

The overlap occurs when ACCUEE issues an implementation report and ANECA issues a verification report (ex ante accreditation). However, once ACCUEE is registered in EQAR, these processes will be unified. From that moment on, the ACCUEE will take over the verification report (ex ante accreditation) taking the REACU protocols as a reference.

ESG 2.4:

6. The panel recommends ACCUEE to include professional representatives in the experts' panels for the ex-post accreditation site-visit and report.

Actions proposed by the ACCUEE:

The ACCUEE, in collaboration with the universities, will analyse the cases in which the incorporation of professional representatives to the visiting panels is considered necessary for the accreditation of degrees.

In the case that the ACCUEE does not currently have in its pool of evaluators with the necessary professional profiles, the agency would make a specific call. In addition, the ACCUEE would organise initial training processes for these people.

ESG 2.7:

7. The panel recommends, when an appeal through a resolution is received by ACCUEE, to appoint experts who did not intervene in the first evaluation, independent from the Technical Committees who ran the first evaluation in order to clearly assure impartiality.

8. The panel recommends ACCUEE to work on an appeal procedure within the Agency in the case of the ex-ante, monitoring and ex-post accreditation of study programmes' procedures. A separate and standing appeal committee should allow to dissociate the decision on the appeal from the Technical Committee that has made the initial decision which is being appealed against.

9. The panel recommends the Agency to formalize the complaints procedure and to communicate more largely on it in its protocols, to ensure HEIs are informed satisfactorily.

Actions proposed by the ACCUEE:

Currently, the channels available to the ACCUEE for compliance with ESG 2.7 are as follows:

1.- Submission of allegations to the draft reports.

This process is currently present and included in all evaluation protocols (ex-ante accreditation, monitoring and ex-post accreditation of study programmes).

2.- Submission of complaints, suggestions and claims

Procedure currently available and based on state and regional regulations:

(<http://www.gobiernodecanarias.org/accuee/sugrec/index.html>)

3.- Submission of complaints and appeals

3.1.- Verification process: submission of allegations as established in section 1) or complaints to the Presidency of the University Council, which will be assessed by the University Council's Committee for Complaints on the Verification and Accreditation of Syllabuses.

3.2.- Implementation Process (authorisation): presentation of allegations as established in section 1) or appeal for reconsideration before the Government or contentious-administrative appeal.

3.3.- Monitoring Process: presentation of the allegations established in section 1) and of a complaint through the channel established in section 2).

3.4.- Process of Renewal of accreditation: presentation of allegations as established in section 1) or of a complaint to the Presidency of the Council of Universities, which will be assessed by the University Council's Commission on Complaints for the Verification and Accreditation of Syllabuses.

Therefore, the review of allegations and complaints is currently carried out by the same ACCUEE technical committee that carried out the assessment or, in the event of an appeal, by a complaints committee external to the ACCUEE (in the processes of Verification and Renewal of Accreditation). Considering the recommendations of the ENQA panel (2022), the ACCUEE management will appoint an independent and permanent Guarantee Commission. In case a complaint related to ESG non-compliance is received by the ACCUEE, the Guarantee Commission will have to review that the assessment results are based on solid evidence, that the assessment procedure has been carried out as set out in the relevant protocol and that the assessment criteria have been correctly applied. In addition, a specific and systematic procedure setting out the functions and actions of this Commission shall be established and incorporated into all ESG-based evaluation procedures of the ACCUEE.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.1:

The panel suggests including international representatives in the various governing, strategic, and operational bodies of the Agency.

Actions proposed by the ACCUEE:

Gradually incorporate international evaluators into the Agency's technical evaluation commissions.

ESG 3.5:

1. The panel suggests giving ACCUEE the direct authority on the recruitment of its staff, through public services or not.
2. The panel suggests that, in the current recruitment process, job profiles are defined by the Agency based on the identified needs.

Actions proposed by the ACCUEE:

The job profiles are currently defined within the ACCUEE's Internal Quality Assurance System (IQAS). These profiles have been reviewed and updated in the last external audit carried out in November by Bureau Veritas.

With regard to the hiring of ACCUEE's own staff, the agency must comply with regional and state regulations in this respect. In this respect, it will coordinate with the Canary Islands Government to establish the needs as they arise. However, the ACCUEE currently has the necessary and sufficient staff to take on its current activities, as well as the new activities that will be taken on after the agency's registration in EQAR.

ESG 2.1:

4. The panel suggests ACCUEE to evaluate the efficiency of the pilot process for further improvement in the upcoming future, as far as the monitoring protocol is being piloted and in light of the last survey results based on the HEIs answers

Actions proposed by the ACCUEE:

ACCUEE, through its 'ACCUEE Listens' programme, evaluates all the evaluation processes it develops. This includes a questionnaire specifically aimed at universities (separated by process) and also at the evaluators involved in each process. All the results of these analyses are published on the agency's website.

In addition, based on the information collected, the Agency will carry out an assessment of the piloting of the monitoring process for recognised degrees during the first quarter of 2023. This document will be published on the Agency's website and will be included in the 2022 meta-analysis of this process.

ESG 2.2:

5. The panel suggests ACCUEE to adapt the ex-post accreditation and future ex-ante accreditation protocol as well as the Docentia procedures to the specificities of the CIHES.

6. Based on the legal requirement and on the identification of a high level of workload for HEIs, the panel suggests ACCUEE to develop the institutional accreditation process in a near future.

Actions proposed by the ACCUEE:

Once ACCUEE is registered in EQAR, it will be able to carry out its own procedures for the evaluation of official degrees (ex-ante accreditation, monitoring and ex-post accreditation) and institutional accreditation. To this end, based on the protocols agreed by REACU, ACCUEE will adapt them to the context of the Canarian Higher Education Area.

ESG 2.4:

7. The panel suggests ACCUEE to involve international experts in the Agency's EQA procedures

Actions proposed by the ACCUEE:

Gradually incorporate international evaluators into the Agency's technical evaluation commissions.

ESG 2.6:

8. The panel suggests ACCUEE to include a HEI statement in the ERR when they do allegations and to provide a clear differentiation on allegations.

Actions proposed by the ACCUEE:

Following the appointment of the assurance committee, the ACCUEE will establish its operating procedure. In this regard, the agency will update everything related to suggestions, complaints and claims in its evaluation protocols, as well as on its website.

Furthermore, the ACCUEE will analyse the possibility of establishing a format or model for universities so that they can clearly differentiate the type of allegations they can submit to the interim reports (i.e. whether the allegation is related to a detected error, to evidence that is insufficient, to the incorrect application of the protocol, etc.).

Application by ACCUEE for Inclusion on the Register

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Clarification provided by the Panel

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Date of the conversation:	2023-02-13
Panel members:	Maria Weber, Vanessa Duclos
Representative of EQAR:	Blazhe Todorovski, Melinda Szabo

1. ACCUEE has submitted on 2021-11-09 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR). On 2022-12-09, ACCUEE submitted the external review panel's report of 2022-10-26.
2. In order to prepare the deliberations of the Register Committee on ACCUEE' compliance with the ESG, EQAR contacted the Panel to clarify the matter(s) below.

ESG 2.6 – Reporting

3. EQAR representatives asked the panel to elaborate on the preparation of the of the reports for the monitoring and ex-post accreditation.
4. The panel explained that they employed a holistic approach when considering the requirements of ESG 2.6 regarding the publication of ERR reports.
5. The panel noted that the experts' task is completed when submitting the site-visit (experts') report. The Technical Committee considers the experts' report but does not include it in the final ERR. The experts' site-visit report is not shared with reviewed institution. The panel noted that this approach is common for all Spanish QA agencies. The panel however agreed that inclusion of the experts' (site-visit) report in the final ERR might be useful.
6. The panel underlined that the ERR written by the Technical Committee is considered as an instrument for ensuring consistency of the reports. The panel understood, from the interviews with experts and institutions, that they were familiar and comfortable with these kind of systems, as the same process is used by all Spanish QA agencies.
7. The EQAR Secretariat also inquired on the forms of factual or non-factual allegations that can be made by the institution on the draft ERR.
8. The Chair explained that during the interviews the panel came to the understanding that the allegations are always focused on the technical parts (factual comments) of the ERR.