

**Approval of the Application
by Higher Education Quality Council of Turkey (THEQC)
for Inclusion on the Register**

Register Committee
2-3/03/2023

Ref. RC38/A128
Ver. 1.0
Date 2023-03-03
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Application of:	2022-03-18	
Agency registered since:	n/a	
External review report of:	2022-10-26	Submitted: 2022-11-23
Type of review:	Focused	
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)	
Review panel members:	Brian Norton, Fiona Crozier, Goran Đaković, Stanimir Boyadzhiev,	
Decision of:	2023-03-03	
Registration until:	2025-04-30	
Absented themselves from decision-making:	/	
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 2022-03-31 2. External Review Report (external file), 2022-10-26 3. Request to the Review Panel, 2023-01-10 4. Clarification by the Review Panel, 2023-01-19 	

1. The application of 2022-03-18 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-03-31.
3. The Register Committee considered the focused external review report of 2022-10-26 on the compliance of THEQC 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 (on 19/01/2023).

Analysis:

5. In considering THEQC's compliance with the ESG, the Register Committee took into account following activities: Institutional External Evaluation (IEE) and the Institutional Accreditation Programme (IAP).
6. The Committee further noted that THEQC has been in the past carrying out (ad hoc) external QA activities on behalf of an external authority. The

Committee underlined that once THEQC is registered in EQAR it is expected to report substantive changes, including carrying out of one-off external QA activities, piloting of any new procedures as well as other quality assurance activities outside the scope of the ESG.¹

7. The Register Committee noted that the authorization and recognition of independent accreditation agencies leads to THEQC endorsing of the agencies' operation in general, but it does not lead to THEQC adopting or endorsing single accreditation reports and decisions by these agencies. The activity is therefore not within the scope of the ESG and not pertinent to the application for inclusion on the Register. As a result, if THEQC were admitted to the Register it would only be able to upload its own reports to DEQAR, and not those of the other agencies it recognises.

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

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

ESG 2.5 – Criteria for outcomes

10. In its previous decision (of 18/03/2021), the Register Committee inquired that the next review explores the consistency of decision making in the newly launched Institutional Accreditation Programme (further IAP). As the current external review report did not discuss this, the Committee sought further clarification from the panel.

11. The panel explained that at the time of the review, no final reports were produced under the new activity, hence the review of the consistency in the final outcomes was not possible. The panel though noted that improvements that strengthen the review process were made - some examples include a revised programme for training of reviewers including case study sessions and revision of the approaches to moderating the decisions and judgements.

12. From the brief overview of the reports published at agency's website, the Register Committee learned that some of the reports from the new procedure (i.e. the IAP) have been already completed prior to panel's site visit. Following this, the Committee could not understand why the panel did not take them in consideration in their analysis.

13. The Register Committee took note of the improvements made by the agency, but could not verify, without a panel's input, whether the consistency in the decision making is provided in full in the new procedure (i.e. the IEP). Following the new developments, the Register Committee found that the agency is partially compliant with the standards and noted that the next review should also evaluate the consistency of the application of IAP criteria in the reports.

¹See also <https://www.eqar.eu/register/guide-for-agencies/reporting-and-renewal/>

ESG 2.6 – Reporting

14. In the previous decision (of 18/03/2021), the Register Committee expressed concerns with the consistency of the structure, the depth, as well as the delay in the publication of THEQC’s reports.

15. In the focused review, the panel noted that the agency has since developed a process chart for ensuring the consistency and the content of the reviews for the Institutional Accreditation Programme and that the reports are discussed on several levels. The panel added that the agency has a system in place that enables higher education institutions and its staff to provide comments on the content of reports.

16. The Committee also learned that the delay in the publication of reports has been addressed and now all of the reports are published on the agency’s website on time.

17. Following the recently introduced changes and addressed issues, the Register Committee was able to concur with panel’s conclusion and found the agency to be compliant with the standard.

ESG 2.7 – Complaints and appeals

18. In its decision of rejection (of 18/03/2021) the Register Committee noted that THEQC introduced a new body for handling appeals (i.e. the Appeals Committee). This body, however, was not part of the organizational structure of the agency, it was not clear who are its members and how the process for the selection of its members is organised.

19. THEQC has since its past review also established a separate commission that deals with complains. The information on the structure and the organization of both Appeals and Complaints body, including the appeals and complaints procedures are now published on the website. The panel noted that the stakeholders are familiar with the new procedures and had expressed positive views on them. At the time of the review, no complaint or appeal has been submitted yet.

20. In the light of the advancements made by the agency to improve the transparency of the complaints and appeals system, the Register Committee found that the agency now complies with the standard. The Committee, however, highlighted the panel’s recommendation that that next review should evaluate the efficacy of handling complaints and appeals.

ESG 3.1 – Activities, policy and processes for quality assurance

21. In its past review, the Committee noted that the involvement of the stakeholders in the design of methodologies was negligible. The THEQC’s council designed the methodologies and other related documents without any further consultation with the wider higher education community.

22. In the report, the panel provided two recent examples of consultative activities organized by the agency – a project based consultation with

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employers on the nature of micro – credentials, and work with experts on developing methodologies for gathering international data on the higher education in Türkiye. The Committee could not understand whether the agency developed further routinised and systemic means for involvement of stakeholders and asked the panel for further clarification.

23. The panel explained (see Annex 4) that the agency now uses several methods for involving stakeholders’ opinions in its work, including a survey on the review process for higher education institution undergoing an accreditation procedure with THEQC, evaluation meetings with representatives of higher education institutions before and after the review and stakeholder opinions’ survey conducted within the process of preparation of the strategic plan (once every 5 years).

24. From the report, the Committee learned that the agency has set up a Student Commission consisting of 8 members selected through an open call. The role of the commission is to promote students’ involvement in the design of internal quality assurance procedures and ensure their further consultations. Commission’s chair represent students in all of the agency’s bodies including the THEQC’s Council.

25. The Register Committee welcomed the steps taken to engage more with the stakeholders and found that the agency developed several meaningful ways to gather community’s opinions in its work and in the creation of its methodologies. **The Committee concurred with the panel’s recommendation of compliance with the standard.** The Committee further underlined panel’s recommendation that the Student Commission of THEQC should consider more equal distribution of tasks among its members, in order to prevent overburdening of the one member responsible for the full representation of the council, but also to enable better inclusion of the diversity of students’ opinions in Türkiye.

ESG 3.3 – Independence

26. THEQC’s workforce consisted heavily of (academic) experts who were employed in the agency but paid by their higher education institutions. The prior panel and, later, the Committee noted that this state affects the operational independence of the agency.

27. Since the last review (of 04/2020), the agency has employed 8 new permanent staff members, 5 new academic experts and 4 new consultants. On the latter two categories, these employees remain to be seconded from their home higher education institutions. In the current review, the panel notes that the number of staff dependent on their home institutions, payment wise, remains “significant”.

28. **While the Register Committee found the increase of permanent staff members to be a positive development, it noted that the dependency of the agency on staff paid by higher education institutions is still concerning for the independence of the agency. Following this, the Committee could not**

concur with panel’s conclusion and found that the agency remains to be partially compliant with the standard.

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ESG 3.6 – Internal quality assurance and professional conduct

29. In the last decision (of 18/03/2021), the Register Committee found that the effectiveness of agency’s internal quality assurance system for fostering intrinsically driven improvements is yet to be assessed, especially in light of the launch of the new activity - Institutional Accreditation Programme (IAP).

30. The agency enhanced its internal quality assurance mechanisms – it introduced extensive training and updated the rubrics for decision making in the IAP. According to the panel, insights from reviewers’ feedback gathered during the training were used for the further enhancement of the agency’s processes.

31. The panel noted that the online system for gathering data on the internal processes (which will further feed into the improvement of the objectivity and integrity of agency’s work) has been already launched. At the time of the review, however, the cycle (i.e. the connection between the findings and the improvement of THEQC’s activities) was not completed yet.

32. The Committee acknowledged the improvements and concurred with panel’s conclusion of compliance, but underlined the panel’s recommendation. The next review should therefore evaluate the full circle of agency’s internal quality assurance – from the feedback/data gathering to the actual changes in the agency’s processes and work.

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

Conclusion:

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

Standard	Previous decision (2021-03-18)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Substantial compliance	Compliance
2.2	Compliance	Substantial compliance	Compliance
2.3	Compliance	Substantial compliance	Compliance
2.4	Compliance	Substantial compliance	Compliance
2.5	Compliance	Substantial compliance	Partial compliance
2.6	Partial compliance	Compliance	Compliance
2.7	Partial compliance	Compliance	Compliance
3.1	Partial compliance	Compliance	Compliance

3.2	Compliance	Full compliance	Compliance
3.3	Partial compliance	Compliance	Partial compliance
3.4	Compliance	Full compliance	Compliance
3.5	Compliance	Partial compliance	Compliance
3.6	Partial compliance	Compliance	Compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

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

36. **The Register Committee therefore approved the application for inclusion THEQC's on the Register. THEQC's inclusion shall be valid until 2025-04-30².**

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

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

Annex I: Terms of Reference for a focused review of the Turkish Higher Education Quality Council (THEQC)

This document is to agree on the Terms of Reference (ToR) that address the request of the Turkish Higher Education Quality Council (THEQC) to undergo a focused review against the Standards and guidelines for quality assurance in the European Higher Education Area (ESG). The request follows EQAR Register Committee's decision to reject the application by THEQC (Ref. RC29/A90, 18 March 2021, annex I).

Chapter 1: Background and request of THEQC for a focused review

THEQC approached ENQA to coordinate a focused review addressing those issues that led to the rejection of THEQC's application for inclusion on the Register. EQAR's 'Procedures for Applications' (§3.21) allow the agency to undergo such a focused review, and to reapply within 18 months based on this review. In addition, the Register Committee further underlined in their rejection letter that the implementation of the Institutional Accreditation Programme is yet to be externally reviewed as an activity on its own. The Committee was confident that this could be done in a focused review organised once the issues mentioned in their decision have been addressed.

Subsequently, on 1 March 2022 THEQC officially approached ENQA to coordinate the abovementioned focused review and prepare a review report that will be considered for the purpose of EQAR-registration. On 7 March 2022, ENQA agreed to coordinate the focused review. The review follows ENQA methodology for partial reviews (see ENQA Rules of Procedure, article 7, and ENQA's policy on partial reviews of members under review) that is aligned with the requirements of a focused review for the purposes of EQAR-registration. In case of provisions not covered by ENQA's policy on partial reviews of members under review, the Guidelines for ENQA Agency Reviews (for full reviews) are to be followed.

Chapter 2: Purpose and scope of the focused review

Chapter 2.1: Activities within the scope of the ESG

The focused review will address the abovementioned ESG standards through the following external QA activities of THEQC:

1. Institutional External Evaluation (IEE)
2. Institutional Accreditation Programme (IAP).

The following standards were judged as partially compliant (see EQAR Register Committee's decision not to include the agency on the Register, ref. RC29/A90, 18 March 2021):

- ESG 2.6 – Reporting
- ESG 2.7 – Complaints and appeals
- ESG 3.1 – Activities, policy and processes for quality assurance
- ESG 3.3 – Independence
- ESG 3.6 – Internal quality assurance and professional conduct

In addition, the review should also address the standards of ESG Part 2 (ESG 2.1-ESG 2.7) for the activity Institutional Accreditation Programme (IAP) to the extent the procedure differs from THEQC's Institutional External Evaluation (IEE) activity, i.e. criteria, consistency in decision making, panel composition, decision making body etc.

The report should also confirm whether the other findings (in regard of those standards not covered in depth now) of the full review report of April 2020 generally remain valid in light of the changes in THEQC's activities.

Chapter 2.2: Content and preparation of the review report

The agency is expected to produce a self-assessment report on the points raised above, indicating in particular changes that have taken place since the last full review. In addition, the agency will indicate any eventual changes and developments in the agency's activities beyond those listed under the criteria under scrutiny, and that might be relevant in view of the agency's ESG compliance. This requirement follows ENQA's policy on partial reviews of members under review, Content, p. 2, and EQAR's Procedures for Applications¹.

The focused review foresees a site visit to the agency.

Following the site visit, a review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined above. In particular, the review report will concentrate on the same criteria as in a full review and assess how the compliance has evolved since this last review. Furthermore, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should 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 Register Committee for application to EQAR. Finally, the report will also assess any eventual changes that have been brought to the attention of the panel in the self-assessment report.

Chapter 3: Panel composition

The ENQA Agency Review Committee will nominate three external reviewers to complete the task. The composition of the panel for the THEQC full review in 2019 was as follows:

Fiona Crozier	Chair (ENQA nominee), quality assurance professional
Simona Lache	Secretary (EUA nominee), academic
Luis Carlos Velón Sixto	Panel member (ENQA nominee), quality assurance professional
Ignas Gaižiūnas	Panel member (ESU nominee)

For the focused review, ENQA will use one member of the panel which carried out the last full review in order to ensure consistency, sufficient background knowledge on the agency, and the external trust in the outcomes (independent of the Agency Review Committee). The two other panel members will be selected so to complement the panel with altogether three viewpoints, that of a student, an academic and a quality assurance professional.

The proposal is to employ:

Fiona Crozier	Chair (ENQA nominee), quality assurance professional
Brian Norton	Panel member (EUA nominee), academic
Stanimir Boyadzhiev	Panel member (ESU nominee)

¹ <https://www.eqar.eu/about/official-documents/#procedures-for-applications>

One of the two members (the academic or the student) will be appointed by the Chair as a secretary, should the Chair not cover the secretary tasks.

The panel members will be asked whether they are willing and able to carry out the work within the timeline as listed in chapter 4 of the terms of reference.

Chapter 4: Timeline

	Deadline
Terms of Reference agreed with THEQC and EQAR	31 March 2022
Completion of focused review SAR by THEQC	15 April 2022
Appointment of focused review panel members and agreement on reviewer contracts, setting the date for the completion of the focused review report	29 April 2022
Site visit to THEQC	End June/July 2022
Delivery of draft report to ENQA Secretariat	End August 2022
Draft report to THEQC for a factual check	First week of September 2022
Completion of report and submission to ENQA	September 2022
Report validation by ENQA Agency Review Committee	October 2022
EQAR Register Committee meeting and decision on the application	December 2022

Chapter 5: Costs

ITEM	COST
Expert fee - Chair	€ 2 000
Expert fee - panel member	€ 1 500
Expert fee - panel member	€ 1 500
Coordination fee ENQA	€ 2 500
Site visit (estimate, full actual cost to be covered by the agency) ²	€ 2 500
TOTAL	€ 10 000

Chapter 6: Annexes

Annex 1: EQAR Register Committee's decision not to include the agency on the Register, ref. RC29/A90, 18 March 2021

² Calculation is based on four European return flights (three experts and a review coordinator), and two nights in a hotel as proposed by the agency under review.

To
Fiona Crozier, Chair of review panel
– by email: fionacrozier5418@gmail.com –

Brussels, 10 January 2023

Application by THEQC for Inclusion of Registration on EQAR

Dear Fiona,

The Higher Education Quality Council of Turkey (THEQC) has re-applied for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR) based on a focused review.

We are contacting you in your capacity as chair of the panel that prepared the focused external review report of 2022-10-26 on which THEQC's re-application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of THEQC's application:

In regard to the criteria for outcomes [ESG 2.5]:

1. Following the last review, the agency has moved from "Institutional external evaluation" (further IEE) to "Institutional Accreditation" (further IAP). We understand that at that time a full review of the IAP cycle was not feasible as the process was not yet rolled out. Since then, THEQC has set up a decision making process and awarded accreditations. Has the panel considered these new processes and how does the agency ensure that the criteria are applied consistently in the new procedure?

In regard to the activities, policy and processes for quality assurance [ESG 3.1]:

1. In its last decision, EQAR queried (about) the effectiveness of the stakeholders' involvement in the creation of methodologies. In the focused review, the panel found that the HEIs' representatives provided feedback in the process of evaluation of the IAP and the

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 rue d'Arlon
1050 Brussels
Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

info@eqar.eu

www.eqar.eu

VAT BE 0897.690.557

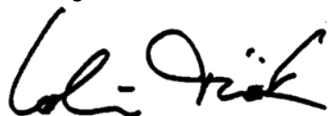
preparation of guidance documents. Does the agency has mechanisms in place that enable systemic and consistent involvement of the stakeholders in the creation of the methodologies?

We would be grateful if it was possible for you to respond by 20/01/2023, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on THEQC's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück
(Director)

CC: ENQA (coordinator)

To: Colin Tück, Director, EQAR

(By email to Aleksandra Zhivkovi)

Bath, 19th January 2023

Dear Colin

Re: Application by THEQC for Inclusion of Registration on EQAR

First of all, if it is not too late, allow me to wish you a very happy new year.

Thank you for your letter of 10th January 2023 in relation to THEQC's application for inclusion on EQAR. I have consulted with the panel that visited THEQC last July. As you will be aware, the site visit was some six months ago; we have revisited our notes and the report so I hope that that detail below goes some way to responding to your questions.

With regard to the criteria for outcomes (ESG 2.5):

“Following the last review, the agency has moved from “Institutional external evaluation” (further IEE) to “Institutional Accreditation” (further IAP). We understand that at that time a full review of the IAP cycle was not feasible as the process was not yet rolled out. Since then, THEQC has set up a decision-making process and awarded accreditations. Has the panel considered these new processes and how does the agency ensure that the criteria are applied consistently in the new procedure?”

As stated in the report, the IAP and IEE processes differ in their outcome and thus, the processes for ensuring consistency had been strengthened and are now more clearly documented with additional access via a common, user-oriented on-line system. The panel saw a sample consistency evaluation report and noted that reviewer training had also been revised to include case study sessions on ensuring consistency of approach and of decision-making. Approaches to moderating the decisions and judgements have also been revised with a view to ensuring consistency of outcomes. It is difficult for the panel to judge how effectively the process for consistency is now working in respect of IAP as there were no judgements at the time of the review. It can only repeat that it viewed the processes now in place as improvements to the processes for ensuring consistency rather than changes. Evidence to support this view (or otherwise) will be apparent during the next external review of the agency.

With regard to the activities, policy and processes for quality assurance (ESG 3.1):

In its last decision, EQAR queried (about) the effectiveness of the stakeholders' involvement in the creation of methodologies. In the focused review, the panel found that the HEIs' representatives provided feedback in the process of evaluation of the IAP and the preparation of guidance documents. Does the agency have mechanisms in place that enable systemic and consistent involvement of the stakeholders in the creation of the methodologies?

Engagement with stakeholders, in the view of the panel, had been significantly improved since the review in 2019. The panel was informed that THEQC formally consults all stakeholders on changes and considers the responses received. This was corroborated by stakeholders including institutional representatives, reviewers and students. The methods employed are evaluation meetings, focus groups and surveys and the feedback received

through each activity is fed back to the relevant commission at the agency. The regular activities include:

- A survey about external evaluation activities where HEIs are asked to evaluate the external evaluation process they have undertaken and the and evaluators involved (after each external evaluation);
- Evaluation meetings with representatives of HEIs (before and after external evaluation),
- Surveys at the end of each evaluator training session;
- Consulting national and international advisors on THEQC processes and methods (by invitation and with a formal agenda) and
- Stakeholder opinion survey conducted within the process for the preparation of the strategic plan (once every 5 years).

The regular feedback from national and international stakeholders feeds into THEQC's discussions on methodologies through its Commissions.

The panel was provided with a stakeholder activity sheet which demonstrates the regularity of such activities in the period from April 2019 – March 2022.

I hope that this additional information is useful to EQAR in its decision-making with regard to THEQC.

With best wishes

A handwritten signature in cursive script, appearing to read 'Fiona Crozier'.

Fiona Crozier

Chair, THEQC partial review panel