

INSTITUTIONAL EVALUATION PROGRAMME

SELF-ASSESSMENT REPORT

May 2018

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1. Introduction

EUA's Institutional Evaluation Programme (IEP) is a quality assurance agency that was first confirmed as operating in compliance with the Standards and guidelines for quality assurance in the European Higher Education Area (ESG) on the basis of an external review report finalised in 2009, thus achieving listing in EQAR and confirming its membership of ENQA. In order to retain its current status in both EQAR and ENQA, IEP requested that ENQA coordinate an external review to examine IEP's compliance with the ESG.

This self-assessment report represents the results of IEP's self-assessment process. It is submitted to ENQA and EQAR as the basis for the external review taking place in 2018. The aim of the report is to explain how IEP meets the expectations of the ESG, as well as to reflect on and analyse IEP's strengths and areas for improvement. The report also takes into account recommendations from IEP's previous external review (2013-14) and issues flagged by the EQAR register committee at the last renewal of inclusion in EQAR (2014). The structure of the report follows the template provided by ENQA.

2. Development of the self-assessment report (SAR)

The self-assessment process was launched in April 2017, with the establishment of a self-assessment group (SAG), appointed by the IEP Steering Committee. The group consisted of members of the IEP pool of experts and one representative of the IEP secretariat. In putting together the group, attention was paid to reflect the diversity of the IEP pool, including with reference: gender, geography, experience in IEP, role within the pool. The members of the group were:

- Kerstin Norén, former Rector, University West, Sweden; and IEP team chair
- Jacques Lanarès, former Vice-Rector, University of Lausanne, Switzerland; and IEP regular team member and member of IEP Steering Committee
- Raymond Smith, Higher Education Consultant, United Kingdom; and IEP team coordinator
- Marija Vasilevska, student, University Ss. Cyril and Methodius Skopje, FYR Macedonia; and IEP student team member and member of IEP Steering Committee
- Tia Loukkola, Director, IEP secretariat

A further representative of the IEP secretariat, Anna Gover, acted as secretary for the group.

While the concrete work of developing the report was carried out by the SAG, other groups and stakeholders contributed to the self-assessment process. The main steps of this process were:

- The IEP Steering Committee set up the SAG in April 2017.
- The SAG met three times: 3 July 2017, 22 September 2017 and 10 January 2018 to prepare the self-assessment report and revise its content on the basis on feedback

received. The SAG also communicated further via email throughout the self-assessment process.

- IEP secretariat conducted a SWOT analysis in June 2017 that fed into the work of the SAG.
- Members of the IEP pool conducted a SWOT analysis during a working group session at the IEP Annual Seminar on 21-22 September 2017.
- Members of the IEP pool gave further input through the annual survey in September 2017.
- The draft report was discussed by the Steering Committee in their spring meeting on 5 March 2018.
- The final version of the report was sent to the review panel and the ENQA secretariat in May 2018.

During the self-assessment process, IEP also examined formal and informal feedback from evaluated institutions and other partners such as national ministries and ESU, and reviewed data regarding evaluations and the pool of experts. As a result of discussions in the SAG meetings, some points were forwarded to the Steering Committee for further consideration.

3. Higher education and QA of higher education in the context of the agency

IEP is a European quality assurance agency, active primarily across the European Higher Education Area (EHEA), but also beyond. As a result, IEP does not operate within any single specific higher education system, however as an EQAR registered agency, it operates in compliance with the ESG (regardless of whether the evaluation takes place within or outside the EHEA). IEP uses a methodology that has proven to be transferable and context sensitive. The 19 evaluations conducted outside the EHEA are testament to this.

IEP's evaluation teams are also European, composed of peers from EHEA countries but not of the country in which the institution to be evaluated is situated. In order to ensure that the team has sufficient information about the higher education framework in which the institution operates, institutions are requested to provide contextual information in their self-evaluation report, and where possible, the IEP secretariat supplies relevant country background information to the evaluation team. A 2016 paper by IEP¹ reflected on this issue and concluded that IEP teams are able to accurately capture system level features, despite not being from the country in question.

In order to ensure legitimacy, IEP only evaluates institutions that are formally recognised within their own national system.

¹ G. Dakovic & T. Loukkola, (2016), *The relevance of international peers and experts in capturing the national higher education context in institutional evaluations* (available [here](#))

4. History, profile and activities of the agency

IEP was founded in 1994 by the Conférence des Recteurs Européens (CRE, one of the predecessor associations of EUA), which launched IEP as a service for its member universities, in response to a proposal at that time from the Ministers of Education and the Council of the European Communities to have a European quality evaluation system for higher education. By setting up IEP, CRE aimed to demonstrate the feasibility of a peer-review evaluation model that met the needs of universities, demonstrated their capacity to self-regulate, while also helping them prepare for national external quality assurance procedures, which were being established in many countries at that time.

When EUA was formed in 2001, it retained IEP as part of its portfolio of activities. Since then, IEP has continued to develop to reflect the changing higher education and quality assurance landscapes, while remaining true to the original philosophy of providing enhancement-led institutional evaluations based on a European peer-review approach. EUA continues to be the legal representative body of IEP, however the Programme is governed by an independent Steering Committee drawn from its pool of experts.

Consistent with institutional autonomy, the mission of IEP is to support higher education institutions and systems in developing their strategic leadership and capacity to manage change through a process of voluntary institutional evaluations. In doing so, IEP evaluations focus on the effectiveness of quality culture and the degree to which the outcomes of internal quality processes are used in decision-making and strategic management, as well as on identifying any gaps in these internal mechanisms.

As a pan-European quality assurance agency, IEP functions independently from any national regulations. Institutions take part in IEP on a voluntary basis and evaluations do not lead to any judgement or decision. Evaluations result in a number of recommendations in key areas of institutional activity, which are designed to support the institution's strategic development.

Since its foundation in 1994, IEP has conducted 415 evaluations in 49 different countries. 396 of the evaluations have been within the EHEA². Since the last external review, IEP has completed 66 evaluations, of which 64 have been within the EHEA³. Further statistics on the evaluations carried out by IEP can be found in Annex 11. The evaluations are conducted by teams drawn from the IEP pool of experts, which has around 60 members.

² Completed evaluations up to March 2018.

³ Evaluations completed in 2014 onwards.

5. Higher education quality assurance activities of the agency

IEP offers institutional evaluations with the following core characteristics:

- A context driven evaluation that takes the institutional mission and goals as its starting point.
- An improvement oriented evaluation that identifies good practice and provides recommendations for improvement, but does not lead to summative decision, accreditation, comparison or rankings.
- A comprehensive evaluation covering all areas of institutional activity, including governance and decision-making, learning and teaching, research, quality culture, service to society and internationalisation.
- Emphasis on an inclusive self-evaluation phase in order to deepen institutional self-knowledge and help identify areas of focus for the evaluation visits.
- A peer review with a European perspective by an experienced evaluation team that represents the diversity of European higher education and takes into account the latest developments in the sector.

Within the framework of the standard IEP methodology, in 2016 IEP introduced the option of evaluations with a special focus. Currently two areas of focus are available: internationalisation, and management of research including use of research results. The focus is approached within the context of a full and comprehensive institutional evaluation, but is given extra attention throughout the evaluation processes, with more in-depth analysis and recommendations. Evaluation teams are composed bearing in mind the need for expertise in the chosen area of focus.

Between one and three years after the initial evaluation, institutions have the option to register for a follow-up evaluation. The aim of a follow-up evaluation is to identify the impact of the initial evaluation, explore the changes that have taken place in the intervening period, and provide further impetus for change and improvement. The follow-up evaluation follows the same methodology as the initial evaluation, except there is one site visit instead of two. Wherever possible, the evaluation team will consist of a mixture of new members and members who conducted the initial evaluation in order to provide both continuity and fresh perspectives.

In addition to these individual evaluations (also referred to as 'regular evaluations'), IEP also offers coordinated evaluations, in which all or some institutions in a particular country or system are evaluated. As a result of a coordinated exercise, each institution receives its own individual evaluation report and, if requested, IEP provides a sector report that highlights shared issues and challenges and facilitates a dialogue among key stakeholders, including governments. Since the last external review, IEP has completed coordinated evaluation exercises in Romania (2012-14, ongoing at the time of the last review), Montenegro (2013-14,

ongoing at the time of the last review) and FYR Macedonia (2016-18). IEP is currently conducting a coordinated follow-up exercise in Montenegro.

As IEP is not rooted in any particular national higher education system, all of its activities can be considered as 'cross-border'. The evaluation principles and methodology remain the same, regardless of the country in which IEP is operating.

6. Processes and their methodologies

All IEP evaluations are based on the core characteristics outlined in Chapter 5. These are implemented through the following steps of the evaluation process:

- Registration and preparation: an institution commits to an evaluation by submitting an evaluation form and signing a contract. IEP verifies that the institution is authentic by checking that it is recognised by the relevant authority within its own system. The IEP secretariat conducts a videoconference with representatives of the institution to ensure a common understanding of the aims and expectations, explain the evaluation process in detail, and answer any questions.
- Self-evaluation: the institution conducts a self-evaluation process, culminating in a self-evaluation report. The report serves as the first point of reference for the evaluation team.
- Two site visits: the evaluation team makes two visits to the institution (a two-day visit and a three-day visit⁴). For follow-up evaluations, the evaluation team conducts one three-day visit⁵. At the end of the second site visit (or only site visit for follow-up evaluations), the evaluation team delivers an oral report, presenting its key findings and recommendations.
- Written report: the evaluation team prepares the written report, which elaborates on the key findings and recommendations. The report is edited for language and checked by the IEP secretariat to ensure that it meets the required standards of quality and consistency. The institution has an opportunity to check the report for factual errors before it is finalised, formally sent to the institution, and published on the IEP website.

⁴ In case the institution is very small, the second visit may be shortened to two days. In case the institution is very large, it may be extended to four days. Any changes must be agreed in advance between the institution and the evaluation team.

⁵ In case the institution is very large, the follow-up visit may be extended to four days upon agreement in advance between the institution and the evaluation team.

- Follow-up: institutions are requested to send a progress report to IEP one year after the completion of the evaluation. Institutions also have the option to register for a follow-up evaluation between one and three years after the completion of the initial evaluation.

As part of its comprehensive approach, IEP evaluates all areas of an institution's activity. IEP takes the institution's mission overall, and goals in each area as the starting point, and examines whether these are appropriate and whether the policies and processes in place are fit-for-purpose. To do so, IEP uses the following key questions, which follow a Plan-Do-Check-Act cycle:

- What is the institution trying to do?
- How is the institution trying to do it?
- How does the institution know it works?
- How does the institution change in order to improve?

To support institutions in reflecting on these questions in each area of institutional activity, IEP provides a set of *Guiding questions for the self-evaluation process* (part of the *Guidelines for Institutions*, available [here](#)). These questions also cover the topics of the ESG Part 1.

Evaluations are carried out by teams of experts drawn from the IEP pool. Each evaluation team consists of five people: a team chair, two regular team members, a student team member and a team coordinator⁶.

- Team chairs: current or former rectors who have demonstrated their abilities by serving as regular team members in previous IEP evaluations;
- Regular team members: current or former rectors or vice-rectors;
- Team coordinators: higher education professionals with experience in the areas of governance, teaching and learning, quality assurance, or research in higher education;
- Student team members: undergraduate or graduate students, with experience in quality assurance and university governance.

Evaluation teams are composed taking into account balance of gender, geography, nationality, discipline and experience in IEP evaluations, as well as any specific area of focus requested by the institution.

⁶ For institutions with fewer than 3500 students, and for all follow-up evaluations, the team consists of four people, with one regular team member instead of two.

The pool of experts is managed according to the *Guidelines for managing the IEP pool*, which outline criteria and procedures for recruiting and training pool members. Further information regarding the IEP pool of experts can be found in Chapter 10, ESG 2.4.

7. Agency's internal quality assurance

IEP has a set of policies that define the governance and operational aspects of the Programme. These include:

- Governance of IEP and terms of reference for the IEP Steering Committee (Annex 1)
- Internal quality procedures (available [here](#))
- Charter of conduct for pool members (available [here](#))
- Complaints criteria and procedure (available [here](#))
- Guidelines for managing the IEP pool (Annex 2)
- Guidelines for institutions (available [here](#)⁷), teams (Annex 4) and the secretariat (Annex 3)

To ensure that the policies and processes remain fit-for-purpose, a number of internal quality assurance measures are implemented on an annual basis. These include:

- An annual survey to pool members is carried out immediately after the Annual Seminar (the yearly training event for pool members, which takes place each September). The results of the survey are discussed and taken into consideration by the Steering Committee.
- A survey to evaluated institutions is carried out immediately after the completion of the evaluation. The results of the survey are discussed and taken into consideration by the Steering Committee.
- The Steering Committee reflects on the activities of the past year when approving the Annual Report each September. In doing so, the Steering Committee also discuss progress against the goals set out in the strategic plan.
- The Guidelines for institutions and teams are reviewed annually by the Steering Committee each spring. Where necessary, changes are made on the basis of feedback from evaluated institutions and teams, as well as observations by the secretariat.

⁷ These are the guidelines for initial evaluations. Guidelines for other types of evaluations are also available on the IEP website: www.iep-qa.org/how-iep-works.html

- The Guidelines for the secretariat are reviewed each summer by the secretariat to ensure that they accurately reflect current practice.
- The secretariat conducts a SWOT analysis of IEP each summer and discusses challenges and possible new initiatives.

Further details about the internal quality assurance processes can be found in Chapter 9, ESG 3.6.

When appropriate, IEP conducts studies exploring specific aspects of the evaluation process in order to provide an evidence base for further improvements. For example, in 2015 the secretariat conducted a study examining where and how the standards of the ESG 2015 were covered in IEP evaluation reports⁸.

The IEP secretariat meets on a regular basis (around once a month) to ensure everyone is up-to-date on ongoing activities and to plan upcoming activities. Furthermore, the small size of the IEP secretariat means that ideas or difficult cases can easily be discussed informally, whenever they occur, and action taken if necessary. Any cases that suggest the need for a change in established policy are discussed in the next Steering Committee meeting, or with the chair of the Steering Committee via email or phone call, to determine what action should be taken in the future.

All members of the IEP secretariat have formal staff appraisals in January/February each year, during which activities and achievements from the past year and goals for the coming year are discussed, as well as areas for development and training needs.

8. Agency's international activities

Beyond conducting evaluations across Europe and beyond, IEP is also active internationally through its participation in networks and events. Through IEP's membership of ENQA, a member of the IEP secretariat regularly attends ENQA's General Assembly and Members' Forum. IEP is also a member of the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) and the International Quality Group of the American Council for Higher Education (CIQG).

Staff of the IEP secretariat regularly attend international conferences on quality assurance and higher education and are also invited as speakers and experts for international events and meetings. As part of this, staff of the secretariat also attend the annual European Quality Assurance Forum, and in 2016 were selected to present a paper on IEP at the Forum.

Through these activities, the secretariat maintains up-to-date knowledge of the European higher education sector and participates in exchange of good practice. As a result, the

⁸ Available [here](#)

secretariat is able to reflect on the changing higher education environment and what this means for IEP and institutions that it evaluates. The expertise gathered is shared at the Annual Seminar and where relevant also enhances the background knowledge used when checking the accuracy of the IEP evaluation reports. Furthermore, members of the IEP pool are also active internationally and use this experience to broaden their perspectives, to the benefit of the evaluations in which they participate.

9. Compliance with European Standards and Guidelines (Part 3)

ESG Standard 3.1 Activities, policy and processes for quality assurance

Standard: Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

IEP is a quality assurance agency offering institutional evaluations and operates in compliance with the ESG. IEP evaluations are conducted at the request of the individual institution. Additionally, IEP carries out coordinated evaluations of some or all higher education institutions in a particular country or region. These evaluations are usually initiated at the joint request of institutions and public authorities and follow the same philosophy and methodology as the individual evaluations.

The number of evaluations varies from year to year, but from its establishment in 1994 through to 2017, 415 evaluations (355 initial and 60 follow-up) had been completed in 49 countries worldwide. Since the last external review, IEP has conducted 66 evaluations (52 initial and 14 follow-up) in 18 countries. 36 of these were undertaken as part of coordinated evaluations (in Romania, Montenegro and FYR Macedonia). Annex 11 provides further details.

IEP's mission and goals are publicly available on the IEP website ([here](#)) and are further articulated in the *IEP Strategy 2015-2020*, which is also available on the website. The mission statement was revised in 2014-15 as part of a strategic planning exercise, which responded to the recommendations made during IEP's last external review. This review had pointed out that the voluntary nature of IEP should be explicitly mentioned in the mission statement and that discussions should be launched regarding the Programme's future development.

The strategic planning exercise was carried out by a working group consisting of pool members, appointed by the IEP Steering Committee. During the process, the whole pool was consulted through sessions in the Annual Seminar and the annual survey to pool members.

As a result of this exercise, the mission statement was amended to state that IEP is a voluntary programme. The mission statement was then elaborated into a strategy document for the coming five years, which contains two main goals and eight strategic objectives

(available [here](#)). Each strategic objective is explained and linked to concrete activities. The strategy also includes an explanation of how progress of implementation is monitored.

The work and governance of IEP is carried out by its pool of experts. These pool members represent different higher education stakeholders, including leaders of higher education institutions, higher education professionals and students. Furthermore, 17 members of the pool (46% of team chairs and regular team members) come from institutions that have previously been evaluated by IEP thereby also bringing perspectives from evaluated institutions. The Steering Committee that governs IEP is drawn from the pool and includes representatives of the different profiles within the pool in order to ensure involvement of IEP's internal stakeholders.

ESG Standard 3.2 Official status

Standard: Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

IEP is established through the registration of EUA as a legal entity in Switzerland⁹. IEP is not in itself a separate legal personality and is therefore represented by EUA in legal and contractual matters.

The recognition of IEP as a quality assurance agency by public authorities is demonstrated by the contracts that IEP (represented by EUA) signs with national authorities for conducting evaluations or selection of IEP as an evaluating body through a public procurement procedure. Recent examples include Montenegro, FYR Macedonia, Romania and Luxembourg.

ESG Standard 3.3 Independence

Standard: Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

IEP operates autonomously on all levels and is independent from national authorities, institutions and other stakeholders.

Although EUA is the legal body of IEP, IEP is governed independently by its Steering Committee, which is composed of members of the IEP pool. The mandate of the Steering Committee is specified in the document *Governance of IEP and terms of reference for the IEP Steering Committee* (Annex 1), which was most recently updated and approved by the Steering Committee in March 2018.

In the past four years, two changes have been made to the governance of IEP, which further underline its independence from EUA. In 2015, the IEP Steering Committee became entirely

⁹ EUA's statutes are available [here](#).

self-appointed, with information on changes in the committee simply being reported to the EUA Board. Previously the appointment of Steering Committee members was formally endorsed by the EUA Board, although in practice the EUA Board never objected to the Steering Committee members proposed by IEP. In 2017, the EUA Board agreed that bearing in mind the need for IEP to operate independently from EUA as a quality assurance agency, it was no longer necessary to appoint a member of the EUA Board as an ex-officio member of the IEP Steering Committee. IEP changed its governance policy to reflect both these changes.

It should also be noted that there is no link between EUA membership and IEP evaluations, except that EUA members benefit from a reduced registration fee. Evaluations are open to all legitimate higher education institutions, and the outcomes of IEP evaluations are not used in assessing EUA membership applications or suitability for involvement in any EUA activities.

While the independence of IEP is firmly secured in its policy documents, the Programme has in recent years also sought to ensure an individual corporate identity, to better communicate its autonomy towards stakeholders. In April 2017, IEP launched a new website¹⁰, hosted entirely separately from the EUA website, and using a visual branding that moves further away from the EUA corporate image.

The day to day activities of the Programme are managed by the IEP secretariat, who work for IEP on a part time basis, spending the rest of their time on EUA activities. Although staff are shared between IEP and EUA, they clearly differentiate between their work for the two bodies. IEP also uses a shared services approach to make use of EUA's physical and technical infrastructure, as well as expertise from support staff in the areas of finance and communication. This arrangement allows for efficient use of resources and reduces costs for IEP, and by consequence also for institutions registering for an evaluation. When using EUA's IT infrastructure, all documents and records related to IEP are stored in a section of the server that has restricted access only for staff that are part of the IEP secretariat.

With regards to the evaluations, the respective roles and responsibilities of IEP, the evaluation team and the institution are laid out in a contract signed between IEP and the institution (and, where applicable, a commissioning body) before the start of the evaluation process. The evaluation itself is carried out entirely independently by the appointed evaluation team. While the secretariat reviews all reports to ensure their consistency and quality, the findings and recommendations are the sole responsibility of the evaluation teams. The chair of the evaluation team signs off on the final report and also has the final say if there is disagreement within the team, or the secretariat proposes any changes. The final draft of the report is sent to the institution for a factual check before it is finalised, however no possibility is given for influencing the team's findings. In cases where the evaluation is commissioned by a third party (for example, a national authority), independence is also

¹⁰ www.iep-qaq.org

safeguarded in that the commissioning body will not have the opportunity to read the individual evaluation reports before they are published.

Each member of the evaluation team is part of the IEP pool of experts and is bound by the *Charter of conduct for pool members* (available [here](#) and also included in the *Guidelines for Teams (Annex 4)*). The charter sets out the expectations towards pool members with regards to professionalism and the avoidance of any conflict of interest, real or perceived.

ESG Standard 3.4 Thematic analysis

Standard: Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

IEP regularly conducts system-wide analyses of specific higher education sectors as part of its coordinated evaluations. Since 2013, system-wide analyses have been published for Romania (2014) and Montenegro (2014). Reports for FYR Macedonia and Montenegro (follow-up report) are due to be published later in 2018. These reports identify trends and common challenges on the basis of the individual institutional evaluation reports and include recommendations for the national authorities for the improvement of the higher education sector. A significant proportion of IEP's evaluations fall under these coordinated evaluations and are therefore covered by the system-wide analyses: 166 out of 415 completed evaluations and 9 out of 15 ongoing evaluations. All completed system-wide analyses are published on the IEP website¹¹.

IEP also conducts studies exploring certain aspects of the IEP methodology. These studies are published on the website and have been presented at relevant occasions (for example, internally at the Annual Seminar and externally at the European Quality Assurance Forum).

Since the last external review, IEP has carried out the following:

- A twenty-year contribution to institutional change (2014)
- How IEP reports address Part 1 of the ESG (2015)
- The relevance of international peers and experts in capturing the national higher education context in institutional evaluations (2016)

IEP is also currently working on a study exploring the usefulness and impact of the Programme on the basis of the responses of a one-off survey sent to evaluated institutions.

Finally, IEP encourages external studies written using information supplied by IEP or the reports publicly available on the website. Examples since the last external review include a

¹¹ www.iep-qa.org/reports-publications.html

paper related to the development of Turkish universities¹², a paper on strategic actions and changes at European universities¹³, and a PhD thesis on perceptions of external quality assurance.

ESG Standard 3.5 Resources

Standard: Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

IEP operates on a non-profit, full-cost basis, with the income from evaluation fees and commissioning bodies entirely supporting the costs of running the Programme. In some cases, and particularly for coordinated evaluations, the fees are funded by a third party (for example, the World Bank and the Open Society Foundation). The costs covered by the fees include:

- Annual Seminar for pool members (travel, subsistence, organisational costs)
- Steering Committee meetings (travel, subsistence, organisational costs)
- Travel for pool members to site visits
- Honorarium for team coordinators for writing the report
- Staff costs (salaries) of the secretariat staff when providing direct support to IEP (financial administration, communication)
- Subcontracted services (language editing for reports, website/publication design)
- Other costs related to running IEP

The IEP budget and accounts are managed separately from the EUA accounts, and are audited on an annual basis. Each spring a statement of income and expenditure of the previous evaluations round, and an estimation of the ongoing evaluation round is presented to the IEP Steering Committee.

In 2015/16 IEP saw a reduction in the number of evaluations and therefore income from fees, in part because a large coordinated evaluation exercise in Romania was finished. In response, IEP took certain measures to reduce expenditure and safeguard the financial sustainability of the Programme. These included:

- Reducing the length of the Annual Seminar as of 2015 from 1.5 days to 1 day (lunch to lunch);

¹² Uslu, B. (2017), *Organizational flexibility of Turkish universities: Evaluations in the institutional reports of European University Association* in Pegem Journal of Education and Instruction, 7(2), 231-256, <http://dx.doi.org/10.14527/pegegog.2017.009>

¹³ Uslu, B. (2018), *Strategic actions and strategy changes in European universities: clues from institutional evaluation reports of the European University Association* in European Journal of Higher Education, 8:2, 215-229, <https://doi.org/10.1080/21568235.2018.1432370>

- Introducing a policy that in years where a particularly low number of institutions register for an evaluation, only pool members participating in those evaluations would be invited to the Annual seminar. This policy was adopted and used in 2015. Since then it has not been necessary, and all pool members were invited to the Annual Seminars in 2016 and 2017;
- Continuing the practice of replacing the workshop for institutions with individual videoconferences in case the number of institutions taking part means a physical workshop would not be feasible. This practice was first introduced to meet the needs of institutions requesting evaluations with a different timeline but was continued because it is more financially viable and allows IEP to offer a more personalised approach. Videoconferences have been used for institutions in the regular evaluation rounds from 2015 onwards and for the coordinated evaluations in Montenegro in 2017/18. For the coordinated evaluations in FYR Macedonia in 2016/17 a physical workshop was held.

Furthermore, the number of staff working on IEP is adjusted according to the number of evaluations and therefore has decreased since 2014: the IEP secretariat currently consists of four members, each working part time for the Programme. Due to the variation and unpredictability of the number of evaluations each year, the workload also varies from year to year. However, IEP secretariat staff can be flexible in the proportion of their time allocated to IEP tasks, allowing for fluctuations in the workload to be accommodated.

When not working on the Programme, the IEP secretariat staff are engaged in EUA activities related to quality assurance, learning and teaching as well as other membership services of EUA. This ensures that staff have in-depth knowledge of relevant European higher education matters and are in a position to contribute this experience to the development of IEP.

Through the shared services approach with EUA, permanent IEP secretariat staff are also supported by EUA staff when specific expertise is required. This includes support from a designated member of the finance unit in dealing with IEP's payments and accounts, and support from the communications unit.

ESG Standard 3.6 Internal quality assurance and professional conduct

Standard: Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

IEP's internal quality assurance policy is outlined in the *Internal quality procedures*, which is publicly available on the IEP website ([here](#)).

IEP collects feedback about the Programme in a number of ways. Two surveys are implemented on an annual basis. One survey is sent to pool members each September, immediately after the Annual Seminar, to gather their perspectives on the Programme, including the Annual Seminar, specific evaluations and general areas for improvement. This survey may also be used to gather input regarding new initiatives or specific aspects of the

IEP methodology. The response rate for this survey in 2016 and 2017 was 80%. This is a significant improvement on previous years following a concerted effort by the secretariat and the Steering Committee to make the survey more concise and relevant, and provide more detailed feedback on follow-up actions. Another survey is sent to evaluated institutions immediately upon completion of the evaluation, to gather feedback on their experiences of the entire process. The results of these surveys are discussed and addressed by the Steering Committee in their spring meeting.

Feedback is also gathered from the pool directly during the Annual Seminar. This may be through working group sessions dedicated to a specific aspect of IEP's work (for example, on the introduction of evaluations with a special focus), or through discussions after presentations on relevant topics. Pool members and institutions are also encouraged to provide informal feedback and suggestions through direct communication with the secretariat.

Some recent examples of actions taken on the basis of feedback received include developing IEP's communication material, incorporating suggestions from the pool regarding the need for a more dynamic and interactive website, and changing the *Checklist for the self-evaluation report* into *Guiding questions for the self-evaluation phase* to respond to concerns about the quality of institutional self-evaluation reports.

IEP activities are also monitored through the Annual Report, which reports on the achievements of the past year and includes a specific section on actions taken as a result of feedback received. The Annual Report is discussed and adopted by the Steering Committee in their autumn meeting and is disseminated to the whole pool.

Since 2016, the Annual Report and the Work Programme follow the structure of the IEP Strategy, in order to make it easier to monitor the activities against the strategic objectives.

In order to ensure that all procedures are explicitly defined, IEP has established sets of guidelines for different stakeholders: institutions, evaluation teams and the secretariat. The guidelines set out the way in which the Programme is implemented and the division of responsibilities. All guidelines are reviewed on an annual basis and disseminated to the relevant parties.

In addition to following the guidelines, IEP pool members are expected to adhere to the *Charter of conduct for pool members*, which sets out the expected standards of professionalism and integrity. Working group sessions based on practical case examples during the IEP Annual Seminar also serve as training for pool members, enhancing the quality and integrity of their work. Recent examples include sessions on formulating recommendations, interview techniques, evaluating the management of research activities, and handling difficult situations during evaluation processes. The training of the whole pool in this way also seeks to address the potential for variability in approaches and findings as a result of cultural factors, which may occur as a result of the international nature of the pool and indeed of the Programme as a whole.

The guidelines for the secretariat are an internal document which sets out in detail processes for all aspects of the Programme. These guidelines serve as training material for new staff members and as a reference for more experienced staff members. At the same time as reviewing the secretariat guidelines each year, the staff conduct a SWOT analysis to reflect critically on the position of the Programme and the lessons learnt during the previous year and discuss suggestions for improvements that could be discussed with the Steering Committee.

IEP ensures its external accountability by undergoing an external review every five years and by placing emphasis on transparency and communication. In 2017, IEP comprehensively reviewed its public communication material (website and leaflet) to make clearer its profile as a quality assurance agency and explain its activities in a more user-friendly way. Initial feedback in response to these efforts has been very positive, particularly with regard to the website.

ESG Standard 3.7 Cyclical external review of agencies

Standard: Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

By virtue of this present evaluation, IEP is fulfilling the requirement to undergo an external review every five year. This is IEP's first review against the ESG 2015. IEP's previous external reviews, against the ESG 2005, took place in 2013/14 and 2009.

10. Compliance with European Standards and Guidelines (Part 2)

ESG Standard 2.1 Consideration of internal quality assurance

Standard: External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

IEP offers comprehensive enhancement-led institutional evaluations and as part of this, an institution's internal quality assurance system is reviewed and its effectiveness is examined through the use of IEP's four key questions. IEP places high emphasis on the institutional responsibility for quality assurance, as well as the need to foster quality culture. While there is a specific chapter in the evaluation report on quality culture, many aspects of the quality assurance system are also covered in a holistic way throughout the chapters on other areas of institutional activity (governance and decision-making, teaching and learning, research, service to society and internationalisation).

Since the last external review, two actions have been taken to further ensure that this is done in a systematic and comprehensive way, and specifically taking into account the standards of the ESG part 1.

First, in 2016, IEP conducted a thorough revision of its guidelines, and in particular of the guiding questions for the self-evaluation report that form part of the *Guidelines for Institutions* (previously presented as a checklist for the self-evaluation process). While the guiding questions are considered non-exhaustive (institutions may add information on topics beyond those covered by the questions), the review process sought to ensure that the topics of part 1 of the 2015 version of the ESG were duly covered in the guiding questions. The ESG standards should be covered primarily under the self-evaluation report sections on governance and decision-making, quality culture and learning and teaching. Some examples of how the ESG are incorporated into the guiding questions include:

- How and to what extent does the institution implement a student-centred approach to teaching and learning? (cf. ESG 1.3)
- How does study programme design and approval function in the institution? Who does what? (cf. ESG 1.2)
- How does the institution ensure the competences of its staff? What kind of staff development structures and processes are in place? (cf. ESG 1.5)

Second, the standards of the ESG part 1 are also included in the template used by the evaluation team for preparing the final evaluation report. In 2016, in parallel to the revision of the guidelines, IEP further elaborated the template to include additional guidance about where to cover the topics of the ESG. This followed on from a study in 2015, which examined the consistency with which the ESG standards were covered in the IEP reports¹⁴. The study showed that there was some variation not only in the extent to which the standards were covered, but also in the chapters under which they were covered.

In addition, the Annual Seminar 2015 included a session on the ESG 2015 in order to ensure that pool members were familiar with the changes to the document and the implications for their work during evaluations.

The links between the ESG Part 1 standards, the guiding questions for institutions and the report template for evaluation are outlined in Annex 6. It should be noted that the same guiding questions (including reference to the ESG) and same report template are used when IEP conducts evaluations outside the EHEA.

ESG Standard 2.2 Designing methodologies fit for purpose

Standard: External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

¹⁴ It should be noted that the study was carried out with reference to the ESG 2015, although these had at that time not yet been formally approved.

IEP continuously reflects on its methodology in order to ensure that it is fit for purpose. As a result, some changes have been made, although the aims and core aspects of the Programme have remained true to its founding philosophy. As a European programme, not rooted in any national system, IEP does not need to conform to any national regulations, however it operates in accordance with the ESG as the quality assurance framework of the EHEA.

One of IEP's core aims is to offer supportive, context-sensitive evaluations. As such, the methodology has been developed to allow for transferability into different regulatory and cultural contexts. The fact that IEP uses the same evaluation approach in countries outside the EHEA is testament to its ability to take into account the local operating context.

For coordinated exercises, evaluations are carried out using exactly the same methodology as regular evaluations, however IEP liaises with the relevant national authorities to agree the terms of reference and, if necessary, to make minor adjustments to the guidelines in order to take into account any national specificities. As with regular evaluations, institutions participating in coordinated evaluations take part in a preparatory workshop or videoconference in order to ensure a common understanding of the aims, scope and procedures for the evaluations.

Furthermore, all institutions submit to IEP a registration form at the start of the process, in which they can identify areas of focus or other specificities regarding the evaluation. Therefore, if any specific measures are required in order to take into account these specificities, these can be agreed at the start of the evaluation process rather than on an ad-hoc basis.

When the IEP Steering Committee or the secretariat identify the need to update or revise any aspect of the methodology, or any new initiatives are proposed, this is done in collaboration with stakeholders. For significant changes (for example, thorough revision of the Guidelines, introduction of the evaluations with a special focus), the Steering Committee is likely to delegate the concrete task to a working group, who will in the course of their work consult with and gather feedback from the whole pool. The composition of the pool, which includes institutional leaders, researchers, administrators and students, ensures that the views of internal stakeholders are taken into account.

Even when no significant changes are proposed, the IEP Guidelines are reviewed on an annual basis, taking into account discussions in the Steering Committee, feedback received from the pool and evaluated institutions, and any relevant developments in European higher education.

ESG Standard 2.3 Implementing processes

Standard: External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include a self-assessment or equivalent; an external assessment normally including a site visit; a report resulting from the external assessment; a consistent follow-up.

IEP evaluations consist of: a self evaluation phase carried out by the institution, site visit(s) to the institution by the evaluation team culminating in the delivery of the oral report; a written report setting out the findings and recommendations; and a follow-up phase. Full details of the evaluation process are laid out in the *Guidelines for Institutions*, which are publicly available on the IEP website. Feedback from pool members and evaluated institutions has indicated that the process functions well.

The process is reliable in that it is clearly set out at the start of the evaluation so there is no surprise for the institution during the evaluation process. The process, roles and obligations of each party are also clearly set out in the contract signed by IEP and the institution at the start of an evaluation, the use of which was introduced in 2016. Any specificities are agreed in advance and must remain in line with the core principles of the Programme.

IEP puts significant emphasis on the self-evaluation phase as being the most important part of the evaluation process. In order to support institutions in this, and to answer questions about any other aspect of the evaluation process, all institutions take part in a preparatory meeting. Until 2013, this was done in the form of a workshop to which representatives of all institutions being evaluated in a given round were invited. From 2014 onwards IEP started offering individual videoconferences for each institution instead. This change was made initially to respond to the needs of institutions that requested evaluations with an adapted timeline in that year (starting earlier than usual). The practice was continued in subsequent years, in part as a sustainability measure, as it requires less financial resources than a physical workshop for both IEP and the institutions (particularly if they are based outside Europe), but also because it was found that it allowed IEP to offer a more personalised approach. A videoconference means that as many people as necessary from the institution can attend the meeting, provides an opportunity for more in-depth discussions on matters specific to the institution, and allows IEP to better understand the institution's motivations and expectations for the evaluation. The videoconferences are conducted by members of the IEP secretariat, and any relevant information gained is communicated to the evaluation team to help them prepare for the site visits. Examples of such information might include updates relating to changes in leadership or other relevant personnel at the institution; details of other ongoing external quality assurance procedures or internal strategic planning exercises; practical considerations such as multiple campuses to be visited or need for interpretation during site visits.

One of the distinctive features of IEP is that evaluation teams conduct two site visits to the institution¹⁵. During the first visit, which lasts two days, the team meets the institutional leadership and key staff, students and external stakeholders and gains a general understanding of the institution and its operating context. At the end of the first site visit, the team may request additional information or documentation from the institution. The second

¹⁵ Only one site visit takes place for follow-up evaluations.

visit lasts three days, during which the team follows up in more detail on issues identified in the first visit. The programme for the first visit is proposed by the institution, while the programme for the second visit is proposed by the team. In both cases adjustments can be proposed by either side to ensure that it meets the needs of both parties. Feedback from the pool and evaluated institutions has indicated that having two site visits is appreciated. On the one hand, it allows the team more time to become familiar with the institution's operating context (which is important as none of the team will come from the country in which the institution is located), and on the other hand it allows for the development of a supportive atmosphere and open communication between the team and the institution.

At the end of the second visit, the evaluation team gives an oral report of their key findings and recommendations. The report is presented first to the rector alone in order to ensure there are no significant factual errors and to provide clarifications privately. It is then presented to the wider institutional community, with invitations to this presentation left to the discretion of the institution.

IEP considers this immediate feedback to be important to sustain the motivation for the evaluation, provide an immediate impetus for change, and ease the concern of the institution by avoiding a long wait for the results of the evaluation. IEP acknowledges the pressure this places on teams to develop the findings and recommendations in a short period at the end of the second site visit, but it ensures that details are not forgotten and allows the team to gauge the reaction of the institution during the oral presentation, which may indicate which aspects need further explanation or contextualisation in the written report. It should also be noted that teams have several moments of reflection before, during and between the site visits in order to develop interim findings.

The written report is an elaborated version of the oral report, with further details of the evidence on which the findings and recommendations were based. The institution has the opportunity to check the report for factual errors, after which it is finalised, sent to the institution and published on the IEP website.

With regards to the follow-up phase, IEP puts the emphasis on the institutional responsibility to reflect and act upon the findings and recommendations of the evaluation report. However, in line with the voluntary nature of the Programme, IEP cannot and does not wish to enforce this. However, it recognises the importance of supporting the institutional follow-up and therefore has introduced a number of measures to facilitate this.

- Since 2012, institutions are required to submit a short progress report one year after the completion of the evaluation. The progress report is expected to contain information on how the institution has addressed the recommendations made in the evaluation report. The purpose of the progress report is to facilitate the institution in reflecting on the changes made and areas where there is still room for improvement. IEP also uses the progress report to gain a better understanding of the usefulness and impact of the evaluation. Since this practice was introduced, progress reports have

been received from nine of the 32 institutions who were requested to send one (institutions participating in the coordinated evaluations in Romania and Montenegro were not obliged to send a progress report although three institutions did so).

- In order to make clearer the importance of the progress report and in response to a lack of response from institutions, in 2015 a clause was added to the IEP registration form asking institutions to commit to sending it, and in 2016 this clause was transferred to the contracts that were introduced between IEP and institutions. When received, progress reports are sent to the original evaluation team, who prepare a brief response. This response is then incorporated into a letter from the chair of the Steering Committee to the institution. Of the institutions participating in the 2015/16 round of evaluations, 50% submitted a progress report. This represents an increase in response from previous years, but indicates that there is still room for improvement. To tackle this, IEP is currently revising the letter template that reminds institutions about the need to submit the progress report in order to better explain the purpose of the report and what is expected, putting a focus on the benefit of the exercise to the institution.
- IEP actively promotes the possibility of a follow-up evaluation to evaluated institutions, between one and three years after their initial evaluation. Since the last external review, 38% of regular evaluations (excluding evaluations under coordinated exercises) were follow-up evaluations. Since IEP's establishment, 31% of all regular evaluations have been follow-up evaluations. To further encourage this and highlight the importance of the full evaluation cycle, in 2015 IEP started to offer a 'combined package' that allows institutions to commit to undergo a follow-up evaluation at the time of registering for an initial evaluation. Institutions taking this package receive a discount on the registration fee. In the 2015/16 evaluation round, one institution signed up for it (out of three registrations for initial evaluations). For the 2016/17 round, two institutions signed up for it (out of five registrations for initial evaluations).

For coordinated evaluations, an additional follow-up element is the post-evaluation workshop. This option is offered to commissioning bodies as an opportunity for stakeholders including the national authorities and the institutions to discuss the overall findings of the evaluations and to launch the discussions regarding follow-up at the system level.

Following the coordinated evaluation exercise in Montenegro in 2013/14, IEP is currently conducting coordinated follow-up evaluations in the country (in addition to initial evaluations of institutions founded in the intervening time), at the request of the same ministry. This is the first time that IEP conducts a coordinated follow-up exercise and will be an opportunity to examine follow-up measures implemented at the national level, as well as at the institutional level.

ESG Standard 2.4 Peer-review experts

Standard: External quality assurance should be carried out by groups of external experts that include (a) student member(s).

All evaluation teams are drawn from the IEP pool of experts and the Programme places great importance on the strength of its pool. The knowledge, experience and commitment of the pool members has a direct impact on the quality of the evaluations. The development of the IEP pool is governed by the *Guidelines for managing the IEP pool* (Annex 2), which was first adopted in 2011 and last updated in 2015. The pool currently consists of 63 members from 27 different countries (see Annex 10 for further details).

Four different profiles are represented in the pool:

- Team chairs: current or former rectors who have demonstrated their abilities through previous IEP evaluations (currently 13% of the pool);
- Regular team members: current or former rectors or vice-rectors (currently 46% of the pool);
- Student team members: enrolled as an undergraduate or graduate student, with experience in quality assurance and university governance (students are always included in the teams and are recruited on an annual basis according to the number of evaluations to be carried out; in 2017/18 there are 13 students in the IEP pool, which is 21% of the pool);
- Team coordinators: higher education professionals with experience in the areas of governance, teaching and learning, quality assurance, or research in higher education (currently 20% of the pool).

All pool members are required to have previous evaluation experience, current knowledge of European higher education issues, and be fluent in English.

As IEP is a European evaluation programme and not rooted in any national system and the evaluation teams never include an expert from the country of the institution in question, all experts are considered to be 'international'.

Each team consists of one chair, one or two regular team members¹⁶, one student team member and one team coordinator, thus ensuring that a variety of perspectives and experiences are represented within each team. Furthermore, each team is composed to ensure a balance of gender, geography, nationality, discipline and experience.

¹⁶ Depending on the size of the institution. For institutions with fewer than 3500 students, teams include one regular team member.

In order to address the age profile of the pool of experts, in 2014 IEP introduced an age limit of 70 years. Therefore, each summer pool members who turned 70 in the course of the previous calendar year automatically retire.

Training for pool members is offered primarily through the Annual Seminar. This yearly one-day event brings together the whole pool and its sessions cover a range of issues including: an update on IEP policies and activities, updates on current issues or trends in European higher education, practical working groups to develop evaluation skills. There is also a special session before the start of the Annual Seminar for new pool members, providing more in-depth training on the IEP philosophy and methodology. IEP also ensures that new members are initially placed in teams with experienced pool members in order that they are properly supported and mentored.

All new pool members must attend the Annual Seminar before being able to participate in an evaluation. Participation in the Annual Seminar is mandatory for those taking part in the evaluations of the upcoming evaluation round.

The IEP secretariat monitors the current and projected profile of the pool in terms of size and balance of roles. If a need for new members is identified, a call is issued outlining the expectations towards pool members and the eligibility criteria, including any specific requirements identified by the Steering Committee, such as a particular nationality or disciplinary background. The call is disseminated through current pool members and relevant National Rectors' Conferences. The IEP secretariat also keep a database of spontaneous enquiries about becoming a pool member that are received when there is no open call and appropriate candidates are contacted with an invitation to submit an application. Candidates are requested to provide a CV and complete a short application form detailed their experience in higher education management, previous evaluation experience and motivation for joining the pool. Applications are screened by the IEP secretariat for eligibility and then reviewed by the Steering Committee, who take a final decision on who to invite to join the pool.

Student team members are recruited on an annual basis through a cooperation with the European Students' Union (ESU). Each summer, IEP informs ESU of the number of students required for the coming evaluation round and ESU nominates candidates from its own pool of quality assurance experts. These nominations are reviewed and approved or rejected by the Steering Committee. All aspects of the cooperation with ESU are outlined in a Memorandum of Understanding, and the IEP secretariat meets with ESU representatives each year to review the cooperation.

ESG Standard 2.5 Criteria for outcomes

Standard: Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

The IEP methodology is mission-driven, meaning that the institution's own mission and goals are taken as the starting point for the evaluation. The evaluation process reviews the fitness of purpose of the mission and goals, and the fitness for purpose of the policies and practices that the institution has in place for meeting the mission and goals.

Instead of applying any set of externally defined criteria, both the institution and the evaluation team reflect on the institution's activities using the Plan-Do Check-Act cycle, which in the IEP context, is formulated as four key questions:

- What is the institution trying to do?
Mission, aims, objectives and their appropriateness, how the university sees itself locally, nationally, internationally
- How is the institution trying to do it?
Processes, procedures, practices in place and analysis of their effectiveness
- How does it know that it works?
Feedback systems in place, in particular QA mechanisms
- How does the institution change in order to improve?
Strategic planning, capacity and willingness to change

These four key questions are further elaborated by a set of guiding questions, which are published in the *Guidelines for Institutions*, which are sent to the institution at the start of the evaluation process and are also publicly available on the IEP website. The questions cover all areas of institutional activities and take into account the aspects covered by the ESG part 1. Together, these sets of questions form the criteria used in IEP evaluations.

Using this approach, the institutions are supported in providing relevant information in their self-evaluation report, which the team explores further during the site visits in order to establish evidence on which to base their findings and recommendations. The evaluation does not lead to any formal decision, but instead results in recommendations for improvement.

The approach has been designed and maintained specifically in order to achieve the aim of IEP, which is to support institutional development and capacity for change by offering context-sensitive, improvement-oriented evaluations.

ESG Standard 2.6 Reporting

Standard: Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

All IEP evaluation reports are published on the IEP website. Since the launch of the new IEP website in April 2017, the reports are presented in a database that is searchable by institution, country, date and report type, which makes them more accessible.

All reports follow the same structure, which is set out in a template for use by the team coordinator when writing the report. The introduction to the report includes a standardised section on IEP and the evaluation process. It also includes information about the profile and operating context of the institution and its self-evaluation process. The main body of the report contains evidence-based findings and recommendations for each of the six topics covered by the evaluation (governance and decision-making, quality culture, learning and teaching, research, service to society, and internationalisation). This includes examples of good practice and analysis of areas requiring improvement. The conclusion highlights the key findings and ends with a summary list of all recommendations.

The report template includes guidance of what to include in each section. The template has been in use since 2013, but was further elaborated in 2015 to include additional instructions on to where to cover each topic of the ESG part 1 to further improve the consistency of the reports. This amendment was made as a result of a study conducted by the secretariat to identify the consistency with which the ESG part 1 topics were covered in the IEP reports, and furthermore, where they were covered in the reports.

A further measure introduced to improve the consistency of reports is the *Handbook for writing IEP evaluation reports* (Annex 5), which was introduced in 2014 and is sent to all pool members at the start of each evaluation round. The handbook addresses the expected format and structure of the reports, conventions for content, tone style and grammar, and gives additional tips for good practice.

While the content of the report is the sole responsibility of the team, the IEP secretariat reviews all reports to ensure they cover all necessary topics, meeting the quality expected by IEP and are clear for an external reader. In case clarification is required, the secretariat contacts the team coordinator to finalise the report. All reports are also language-edited, either by the IEP secretariat or by an external editor.

In order to ensure the accuracy of the reports, institutions receive the final draft of the report and have two weeks in which to check the report for factual errors.

ESG Standard 2.7 Complaints and appeals

Standard: Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

IEP's complaints policy is outlined in the document *IEP Complaints criteria and procedure* (available [here](#)), which was last updated and approved by the Steering Committee in 2015. The policy is publicly available on the IEP website.

An institution may submit a complaint if it considers that an evaluation has not been carried out in accordance with the IEP Guidelines and the *Charter of conduct for pool members*. This may relate to an aspect of the evaluation procedure or the contents of the evaluation report.

Complaints should contain a detailed description and evidence of the statements or actions in question and outline the ways in which the situation may be rectified.

Complaints must be acknowledged by the chair of the Steering Committee within two weeks of their receipt. The chair will then decide on further action. This may be to discuss the complaint with the institution and the evaluation team in order to resolve or reject it. Alternatively, the chair may establish a Complaints Committee to investigate the matter further. A Complaints Committee is composed of three pool members, who decide whether to uphold or reject it. If a complaint is upheld, the evaluation report may be amended if appropriate, or an additional site visit may be made at the institution and the report revised or rewritten.

As an IEP evaluation does not result in any formal decision, an appeals procedure is not required.

11. Information and opinions of stakeholders

IEP defines its stakeholders as those who play a role in defining IEP's policies and processes, and those that are involved in and impacted by its evaluations. The section below provides a summary of IEP's main stakeholders and their views¹⁷.

The pool of experts

The IEP pool members are IEP's key internal stakeholders as they conduct the evaluations and provide representatives for IEP's governing body. Furthermore, they also represent more broadly the higher education institutions through their positions as institutional leaders, higher education professionals and students. Therefore in giving feedback, they do so from the perspective of their professional positions as well as their role as IEP pool members.

IEP regularly consults pool members through an annual survey and during the Annual Seminar. Furthermore, pool members are represented in the Steering Committee, which takes all major decisions regarding IEP. Feedback from the pool allows IEP to evaluate ongoing and new processes, identify weak points in the Programme and gather suggestions for further development. This has resulted in measures such as the improvement of IEP's communication material and greater transparency in explaining the selection of members of the Steering Committee.

Student members of the pool are nominated by ESU. While feedback from student members is collected together with that of the whole pool, representatives of IEP and ESU also meet each summer to review the process for nominations, processes for communication and logistics regarding student involvement in the evaluations and to update each other on recent

¹⁷ IEP does not include EUA in its list of main stakeholders as EUA does not have any influence over IEP policies. IEP's relationship with EUA is detailed in Chapter 9, ESG 3.3.

developments. In the meeting in August 2017, it was identified that some students were confused about the division of responsibilities between IEP and ESU with regard to booking flights and hotels for the evaluation site visits (as these differ from the process for other IEP pool members). As result, IEP and ESU produced an information sheet for student pool members outlining the division of responsibilities and who to contact for which issues.

Evaluated institutions

Evaluated institutions are requested to provide feedback on the whole IEP process through a survey sent to them immediately after the conclusion of their evaluation. Feedback is generally positive, and while this gives confidence to IEP in its approach and procedures, it should be noted that this may also be linked to the enhancement-led approach used by the evaluation teams and voluntary nature of IEP, meaning that institutions actively chose for the IEP approach upon registration. Furthermore, the survey is conducted too soon after the evaluation to gather feedback about the impact on the institution. In order to gain a deeper understanding of this aspect, IEP is currently preparing a study on the impact and usefulness of evaluations, using the results of a survey sent to institutions evaluated within the past five years.

Complaints from institutions are dealt with in accordance with the *IEP complaints criteria and procedure* (see further in Chapter 10, ESG 2.7). Since the last external review, IEP has received two complaints. Both contained numerous objections to the findings of the final evaluation reports, and were dealt with as follows:

- In one case, an ad-hoc group was established to examine the complaint and propose a resolution. As a result, some amendments were made to the final version of the report by adding an explanatory footnote and changing some wordings.
- In the other case, the chair of the Steering Committee requested a written statement from the evaluation team and on the basis of this, and further discussions with the secretariat and the evaluation team, decided that three sentences would be deleted from the final version of the report.

Commissioning bodies

In cases of coordinated evaluations, the commissioning body, usually the education ministry of a particular country, is an important stakeholder. IEP ensures constant communication with ministries during coordinated evaluations and puts particular emphasis on the preparatory phase through meetings and negotiations for the contract and terms of reference, in order to ensure a common understanding of expectations and responsibilities. Post-evaluation workshops, usually held at the end of coordinated evaluation exercises, provide an opportunity for the evaluated institutions and the relevant ministry (and any other stakeholders in the process) to provide feedback on the findings and recommendations, as well as the process as a whole.

The request of the Montenegrin ministry for IEP to conduct coordinated follow-up evaluations is testament to their satisfaction with the process and outcomes of the initial coordinated evaluations in that country.

12. Recommendations and main findings from previous review(s) and agency's resulting follow-up

The panel of the previous external review recommended that IEP:

1. Should keep under review the age-profile and current to retired ratio of pool members to ensure dynamism and currency in panel membership. The Review Panel further recommends that

a) the pool of regular experts should be extended with qualified and experienced colleagues other than those at the level of rector and vice-rector and

b) that all IEP panel members should be appropriately experienced and/or trained, particularly in matters of Academic Quality Assurance.

The IEP Steering Committee has had extensive and ongoing discussions about the profile of the IEP pool. In spring 2014, the Steering Committee revised the policy for managing the IEP pool and set an age limit for pool membership of 70 years old. In practice this means that each summer pool members who turned 70 in the course of the previous calendar year automatically retire. Since then, 28 pool members have retired due to reaching the age limit (others have left the pool for other reasons). Currently, 51% of the pool are aged 60-70, 16% are 50-59, 11% fall in each of the age brackets 40-49, 30-39 and 20-29 (see also Annex 10). This gives a slightly younger age profile of the pool in comparison to the time of the last external review, in part due to the introduction of the age limit, and in part due to recruiting new pool members.

The introduction of the age limit has also contributed to addressing concerns about the portion of pool members who are retired from their professional positions. However, it is also important to note that although a significant portion of regular team members and team chairs are retired from their positions as rectors or vice-rectors, they are nonetheless still professionally active in higher education, for example, as professors. Currently only 5% of the pool are in retirement, while 44% are former rectors or vice-rectors but still professionally active (see further, Annex 10). In order to ensure that IEP has up-to-date information about pool members they are requested to submit a new CV to the secretariat every two years.

The Steering Committee has also underlined the need to ensure a sufficient and regular renewal of pool members, to sustain the capacity of the pool due to retirements and to bring in new knowledge, experience and perspectives. As such, new pool members are recruited taking into account the projected size and profile of the pool. Since the last external review, 11 new pool members have been recruited.

In revising the policy for managing the IEP pool and in planning the recruitment of new members, the Steering Committee have regularly discussed the profile of pool members and considered whether or not to extend the criteria for regular team members to include those other than rectors and vice-rectors. However, the Steering Committee has decided to continue the current policy, for a number of reasons:

- IEP's focus is on supporting institutions to improve their strategic leadership and capacity to manage change. As such, IEP considers it important that the evaluation teams include sufficient experience of institutional leadership to be able to properly evaluate this and provide relevant recommendations.
- Other profiles and peers of the institutional community are already represented through the roles of the team coordinators (representing higher education professionals) and students. Furthermore, most of the team chairs and regular team members bring not only their experience of institutional leadership positions, but also hold, or have held other positions, such as dean and professor, thereby bringing further insights to managerial and academic matters. This ensures that the team as a whole has a wealth of experience and perspectives on which to draw.
- The composition of the evaluation teams and current profile of the pool of experts is often cited as a particular strength of IEP.

Finally, IEP recognises the importance of continuous training for its pool of experts, both in terms of updating knowledge of European higher education trends, and for ensuring familiarity with IEP's methodology for conducting evaluations. Therefore, IEP continues to organise its Annual Seminar in September each year which covers both aspects. Recent topics have included:

- Higher education developments: research ethics; university autonomy, revision of the ESG.
- Evaluation methodology: formulating questions during interviews; formulating recommendations; dealing with unusual or difficult situations during evaluations.

Responses to the annual survey to pool members indicate that the majority of pool members find the Annual Seminar to be a good event in terms of getting an update on European higher policy, developing skills as an evaluator and preparing for evaluations. New pool members indicate that they feel well prepared to conduct evaluations after their first Annual Seminar.

2. Should augment further use of the common report template in order to increase consistency of reports.

IEP introduced a report template for all initial evaluations in 2013, just before the previous external review. The template was revised in 2015 to provide further guidance on where to include the topics covered by the ESG part 1 and to better reflect the themes covered by the guiding questions for institutions, which were also revised in 2016. It is currently too early to

conduct another analysis to review the effectiveness of the revised template, however it is expected that this will be done in the coming years.

In 2014, IEP also introduced a *Handbook for writing evaluation reports*, in order to further improve the consistency of the reports, and which is disseminated to all pool members at the start of each evaluation round.

Finally, it should be noted that IEP has a stable and experienced group of team coordinators, who are responsible for drafting the reports. The average length of service of the team coordinators is 10 years. Having participated in many evaluations, they are able to produce consistent and high-quality reports.

3. Should augment the follow-up procedure by including the cost and condition of the follow-up procedure in the basic contract with an institution inviting an evaluation. A follow-up visit or review would not be as extensive as a full review, but merely focused on progress made towards implementing recommendations.

IEP stands by the voluntary nature of its evaluations, however it recognises that this brings certain challenges regarding the follow-up procedure. While the Steering Committee have agreed that institutional follow-up of the findings and recommendations of the evaluation procedures cannot be made mandatory, IEP has introduced a number of measures in order to strengthen the follow-up aspects of the evaluation procedure (for further details, see Chapter 10, Standard 2.3).

- In order to make clearer the importance of the progress report, in 2015 a clause was added to the IEP registration form asking institutions to commit to sending it, and in 2016 this clause was transferred to the contracts that were introduced between IEP and institutions. Since the introduction of this practice nine progress reports have been received.
- In response to the above recommendation and to highlight the importance of the extended evaluation cycle, in 2015 IEP started to offer a 'combined package' that allows institutions to commit to undergo a follow-up evaluation at the time of registering for an initial evaluation. Institutions taking this package receive a discount on the combined registration fee. So far, three institutions have taken up this option.

IEP also continues to actively promote the possibility of a follow-up evaluation to evaluated institutions, between one and three years after their initial evaluation. This is done through a targeted mailing to eligible institutions in spring each year.

The evidence suggests that IEP has made some progress in emphasising the importance of the follow-up processes, however there continues to be room for improvement, particularly relating to the number of progress reports received.

4. Should explicitly state or refer to the voluntary nature of an institution's engagement with the IEP in the Mission Statement.

Following the previous external review, and as part of IEP's strategic planning exercise, the IEP mission statement was revised and was approved by the Steering Committee in spring 2015. The new version includes clear reference to the voluntary nature of IEP.

5. Should launch discussions on the IEP's future and strategic planning into concrete initiatives.

IEP acknowledges that at the time of the previous external review, the Programme did not have any strategic plan beyond the existing mission statement. In response to this recommendation, IEP launched a strategic planning process and developed a plan for 2015-2020 with strategic aims and objectives accompanied by explanations of actions to be taken to achieve them and measures for monitoring progress. The strategic plan was adopted by the Steering Committee in spring 2015 and this led to initiatives such as the introduction of the special focus evaluations and the clarification of IEP's message and image for communication purposes. In 2017, the Steering Committee reviewed the progress made against the strategic plan and identified the following areas in which goals were not being met: the number of evaluations per year, uptake of the special focus evaluations, and seeking ways to work outside Europe. Further details on these areas for improvement can be found in Chapter 14.

The EQAR Register Committee flagged the following issues for attention:

1. Use of ESG part 1 (standard 2.1 of ESG 2005): It should be addressed to what extent the different elements of part 1 of the ESG are actually reflected in IEP evaluation report.

In 2015, IEP conducted a study to examine the extent to which the standards of ESG part 1 were reflected in the IEP evaluation reports. The study identified some inconsistencies in this regard and two actions were taken as a result. These measures also reflected the approval of the revised version of the ESG in 2015.

- In 2016, IEP conducted a thorough revision of its *Guidelines for Institutions* to include additional concrete references to the ESG, particularly in the *Guiding questions for the self-evaluation report*. As the self-evaluation report is the first source of evidence for the evaluation team, encouraging full coverage of the ESG in the self-evaluation report helps to provide a solid starting point for the evaluation team to examine these topics.
- Also in 2016, IEP further elaborated the template used by evaluation teams when writing their report. The template now includes specific reference to the ESG standards, providing guidance on where in the report they should be covered.

As mentioned above, it is currently too soon to evaluate the impact of these measures, however a further study is intended in the coming years.

A more detailed analysis of how the standards of ESG part 1 are covered in IEP evaluations can be found in Chapter 10, ESG 2.1 and in Annex 6).

2. *Follow-up procedures (standard 2.6 of ESG 2005): It should receive attention whether the new 'package offer' and any other steps taken have contributed to implementing a consistent follow-up procedure as part of IEP's evaluations.*

See above under the recommendation 3 from the ENQA panel.

3. *Independence (standard 3.6 of ESG 2005): It should be thoroughly analysed how IEP's integration within and dependence on EUA have developed, and what impact that had on its independence.*

EUA is the legal body of IEP, however IEP is governed and operates independently. Since the last external review, two changes have been made regarding the IEP governing body, the Steering Committee, which further underline its independence from EUA.

- Since 2015, the Steering Committee is entirely self-appointed, with the EUA Board no longer required to formally appoint new members.
- Since 2017, the Steering Committee no longer includes a representative of the EUA Board in an ex-officio capacity.

Both changes are reflected in the *Governance of IEP and terms of reference for the IEP Steering Committee*, which was most recently updated and approved by the Steering Committee in March 2018.

Furthermore, IEP has recently taken measures to strengthen its individual corporate identity so to better communicate its independence externally. Since April 2017, IEP has a new website, which is hosted separately from the EUA website, and a visual branding that is further differentiated from the EUA brand.

Further explanation and analysis of IEP's independence and relation with EUA can be found in Chapter 9, ESG 3.3.

13.SWOT analysis

In preparation for the self-assessment report, IEP gathered input for the SWOT analysis during the Annual Seminar 2017, through the subsequent survey to pool members, and from the IEP secretariat. From the material gathered, the SAG identified the most important and frequently mentioned strengths, weaknesses, opportunities and strengths of the Programme.

Strengths

- Enhancement-led, critical friend approach
- Highly experienced and international teams, with diverse practical experience in institutional governance, and a professional secretariat

- IEP methodology is widely applicable/transferable to different contexts (context sensitive), and provides a comprehensive/holistic approach – a particular strength in relation to the IEP mission
- IEP is adaptable and solid as an organisation, maintaining a stable culture and strong commitment to the IEP mission

Weaknesses

- Follow-up of recommendations within the evaluated institution cannot be enforced
- Some variability in approach as a result of cultural factors (for example in how the team works together, or in the culture of self-evaluation at the institution)
- Potential lack of capacity to capitalise on opportunities in emerging markets

Opportunities

- Potential for further coordinated evaluations, supporting countries in developing their higher education systems
- Potential to make the impact of IEP on evaluated institutions more visible

Threats

- Unpredictability of the demand for evaluations a threat to IEP's sustainability
- More competition from other agencies as they increasingly offer a similar service to IEP as part of national quality assurance frameworks
- Decreasing financial resources for institutions means less money to use for voluntary services such as IEP
- Ongoing national reforms, and evaluation fatigue

14. Current challenges and areas for future development

April 2017 marked the halfway point of the IEP strategy 2015-2020 and the Steering Committee took this moment to reflect on the progress made towards meeting the objectives set out in the strategy. Three areas of concern were raised: the number of evaluations per year, uptake of the special focus evaluations, and seeking ways to work outside Europe. These issues are interconnected as they relate to the sustainability of the Programme.

IEP is very aware that its future sustainability (financially and in terms of the viability of the Programme in general) is dependent on conducting sufficient evaluations each year. Since the last external review, the number of individual evaluations carried out by IEP each year has ranged from seven to nine, while the number of evaluations carried out each year in the

framework of coordinated evaluation exercises has ranged from none to 28. The number of registrations is impossible to predict, which makes long term resource planning difficult.

Demand for the evaluations offered by IEP is influenced by a number of contextual factors. These include

- Increased competition from other quality assurance agencies. As more agencies move towards offering improvement-oriented evaluations at institutional level (in accordance with an observable trend in Europe of national frameworks opting for this approach), there is a change in the focus of the added value of an IEP evaluation.
- Evaluation fatigue. Institutions are already regularly evaluated through their national frameworks and may opt for subject-specific evaluations for professional programmes. Furthermore, as national quality assurance systems mature, institutions may have already undergone several cycles of external evaluation. The motivation for an additional, voluntary evaluation is therefore reduced.
- Diminishing financial resources. Institutions face ever increasing pressures on their budgets and there is limited funding available for voluntary quality assurance processes such as IEP.

As outlined in this report (see Chapter 9, ESG 3.5), IEP has already taken a number of measures to ensure the financial sustainability of the Programme. Furthermore, the flexibility afforded to the secretariat in terms of their dividing time between IEP and EUA means that staff are able to adapt their working arrangements according to the number of evaluations each year.

The IEP Steering Committee also regularly discusses the option of expanding the services offered by IEP in order to cater for the changing demands of the market. Developing the option of evaluations with a special focus is a step already taken in that direction.

The Steering Committee and the SAG also identified a need to be more proactive in communicating about IEP in order to capitalise on potential opportunities for evaluations. This includes ensuring emerging markets are aware of what IEP can offer, and taking advantage of the power of word of mouth when it comes to attracting individual institutions to register for IEP, particularly with regards to those outside Europe. As such, there may be potential to make better use of evaluated institutions and pool members to act as ambassadors for the Programme.

A further challenge of which IEP is well aware is that of follow-up processes. As has already been outlined in this report, IEP recognises that the voluntary nature of the Programme poses a difficulty as institutional follow-up cannot be enforced. A number of measures to support follow-up actions have been introduced since the last external review (see further Chapter 10, ESG 2.3). The number of follow-up evaluations carried out by IEP has increased in recent years and there has been some initial interest in the 'combined package'. However, IEP

acknowledges that the numbers of progress reports that it receives could be improved, although there is no possibility to enforce this. IEP will continue to monitor this, in particular looking at the evolving numbers of progress reports, and is aware of the need to regularly reflect on how best to support evaluated institutions in addressing the findings and recommendations, while maintaining the voluntary nature of the Programme.

Glossary of Terms

Initial evaluation: the first evaluation offered to institutions.

Follow-up evaluation: an evaluation offered to institutions one to three years after the initial evaluation.

Regular evaluation: evaluations conducted as part of the IEP's annual evaluation cycle, not part of coordinated evaluations.

Coordinated evaluations: evaluations of all or some of the institutions in a particular country, system or region, usually at the request of the relevant ministry or public authority.

IEP pool: the group of experts trained to conduct IEP evaluations, from which the evaluation teams are drawn.

List of annexes

1. Governance of IEP and terms of reference for the IEP Steering Committee
2. Guidelines for managing the IEP pool
3. Guidelines for the Secretariat
4. Guidelines for Teams 2018
5. Handbook for writing IEP evaluation reports
6. Table showing links between ESG Part 1, IEP guiding questions and IEP report template (consideration of internal quality assurance)
7. Annual Report 2017
8. Analysis of 2017 surveys to IEP pool and evaluated institutions
9. Work Programme 2018/19
10. Overview of the IEP pool
11. Overview of IEP evaluations