

ENQA AGENCY REVIEW

TURKISH HIGHER EDUCATION QUALITY COUNCIL (THEQC)

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EXECUTIVE SUMMARY

Following an external review against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) organised by the European Association for Quality Assurance (ENQA) in December 2019, the Turkish Higher Education Quality Council (THEQC) was granted membership of ENQA in May 2020. However, subsequent scrutiny by the European Quality Assurance Register (EQAR) in 2021 found the agency to be only partially compliant with the following standards:

ESG 2.6 - Reporting (in particular the consistency of reports and verification of the publication of Institutional Evaluation Programme (IAP) reports)

ESG 2.7 – Complaints and appeals (in particular the implementation of a new process for handling appeals)

ESG 3.1 – Activities, policy and processes for quality assurance (in particular stakeholder involvement in the agency’s work)

ESG 3.3 – Independence (in particular the fact that many of the agency’s staff are university employees)

ESG 3.6 – Internal quality assurance and professional conduct (in particular, the implementation of the new IQA process and its capacity to drive improvement).

Thus, registration on EQAR was denied. Subsequently, in 2022, THEQC officially approached ENQA to coordinate a focused review and prepare a review report that will be considered for the purpose of EQAR-registration. The above-mentioned ESG were scrutinised through the lens of two of the agency’s activities:

- Institutional External Evaluation (IEE) and
- Institutional Accreditation Programme (IAP).

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

This report, therefore, represents the outcomes of a focused review against the above-mentioned ESG. At the same time, THEQC agreed with ENQA that the self-assessment report would also serve as its follow-up report to the ENQA Board. Terms of reference for the process were agreed with EQAR.

ENQA nominated a panel of three experts for this focused review, with one member having already served in the panel of the previous review (Fiona Crozier, Chair) and two new members (Brian Norton, EUA nominee and Stanimir Boyadzhiev, ESU nominee). THEQC provided a SAR and supporting documentation in April 2022 which focused on the ESG in question, and which also provided updates on action taken in response to other recommendations made by the panel in 2020. A two-day site visit took place at THEQC’s premises on 20th and 21st July 2022.

The review panel believes that THEQC presented itself as an agency willing to strive actively to respond to the recommendations and suggestions made in the ENQA report of 2020 and also to respond positively to the comments in EQAR’s decision letter of March 2021. The panel noted progress on all above-mentioned standards and found the agency to be compliant with them. Nevertheless, in some cases (e.g., ESG 3.6 and 2.7) policies and procedures have been recently developed and/or there has been no opportunity to test their efficacy as yet.

The review panel’s conclusions and recommendations in relation with each relevant ESG are the following:

ESG 2015	ENQA focused review panel 2022 conclusions	Commendations and suggestions
2.6 Reporting	Compliant	Suggestion: that THEQC considers publishing the outcomes/reports of its IAP process in English.
2.7 Complaints and appeals	Compliant	
3.1 Activities, policy and processes for quality assurance	Compliant	Commendation: the Quality Ambassador Handbook. Commendation: the involvement of students across the work of the agency. Suggestion: that the workload of the Student Commission be more evenly distributed among its members.
3.3 Independence	Compliant	Suggestion: That THEQC continues on the path of growing the proportion of staff permanently employed by the agency and diminishing the use of seconded experts. Suggestion: That THEQC considers how best to ensure an “arm’s length” task-specific relationship with local consultants. For example, non-local consultants may be usefully structured as an International Consultants Forum or International Advisory Committee.
3.6 Internal quality assurance	Compliant	

In addition, the review panel found THEQC to be in compliance with standards 2.1-2.7 of the ESG in respect to its IAP.

In conclusion, the review panel is convinced that the implementation of procedures and policies developed, including those to strengthen stakeholder involvement, especially that of the students, in the agency’s work, will further enhance and support THEQC’s activities and operations. The panel

commends THEQC for the thorough and incremental approach that it has taken to respond to all recommendations and comments made via the ENQA review process and the EQAR decision-making process (commendation number 1).

INTRODUCTION

Following its first review against the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in December 2019, the Turkish Higher Education Quality Council was granted ENQA membership in May 2020. However, subsequent scrutiny by the European Quality Assurance Register (EQAR) in 2021 found the agency to be only partially compliant with the following standards:

ESG 2.6 - Reporting (in particular the consistency of reports and verification of the publication of IAP reports)

ESG 2.7 – Complaints and appeals (in particular the implementation of a new process for handling appeals)

ESG 3.1 – Activities, policy and processes for quality assurance (in particular stakeholder involvement in the agency’s work)

ESG 3.3 – Independence (in particular the fact that many of the agency’s staff are university employees)

ESG 3.6 – Internal quality assurance and professional conduct (in particular, the implementation of the new IQA process and its capacity to drive improvement).

Thus registration on EQAR was denied on 18th March 2021. Subsequently, on 1 March 2022 THEQC officially approached ENQA to coordinate a focused review and prepare a review report that will be considered for the purpose of EQAR-registration. On 7 March 2022, ENQA agreed to coordinate the focused review. The review follows ENQA methodology for partial reviews (see ENQA Rules of Procedure, article 7, and ENQA’s policy on partial reviews of members under review) that is aligned with the requirements of a focused review for the purposes of EQAR-registration. In case of provisions not covered by ENQA’s policy on partial reviews of members under review, the Guidelines for ENQA Agency Reviews were followed. Consequently, the above-mentioned ESG were scrutinised through the lens of two of the agency’s activities:

- Institutional External Evaluation (IEE) and
- Institutional Accreditation Programme (IAP).

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

This report, therefore, represents the outcomes of a focused review against the above-mentioned ESG. At the same time, THEQC agreed with ENQA that the self-assessment report would also serve as its follow-up report to the ENQA Board. Terms of reference for the process were agreed with EQAR.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND AND SCOPE OF THE REVIEW

ENQA’s regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. THEQC’s first review took place in 2019 with the site visit conducted in December 2019 and the agency was granted ENQA membership in May 2020.

However, as stated above in the Introduction, following scrutiny by the EQAR Register Committee, registration was denied due to a judgement by the Committee of partial compliance against five standards. The purpose of this review was, therefore focused on the five standards in question, as well as the standards of ESG Part 2 (ESG 2.1-ESG 2.7) for the activity Institutional Accreditation Programme

(IAP) to the extent the procedure differs from THEQC's Institutional External Evaluation (IEE) activity, i.e., consistency in decision making, panel composition, decision making body etc.

REVIEW PROCESS

The 2022 focused review of THEQC was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline and scope set out in the Terms of Reference and in EQAR's letter to the agency of 18th March 2021. The panel for the review was appointed by ENQA and composed of the following members:

- Fiona Crozier, Consultant, former Head of International, QAA, UK, chair (ENQA nominee), quality assurance professional;
- Stanimir Boyadzhiev, PhD student, political sciences, University of Ruse, Bulgaria, panel member (ESU nominee);
- Brian Norton, Professor, Environmental Engineering, Principal, Technological University Dublin, Ireland, panel member (EUA nominee), academic.

Support from ENQA was provided by Goran Dakovic, Reviews Manager, who acted as the review coordinator.

A self-assessment report (SAR) along with ten annexes was provided by THEQC in April 2022. The SAR responded to the comments by EQAR in relation to each of the five standards in question and also provided further information and detailed responses to the recommendations and suggestions made in the report drafted by the panel following the ENQA review in 2020, since the agency had agreed with ENQA that its SAR would also form the basis of its follow-up report to the ENQA Board.

The review panel scrutinised the SAR and all additional documents and discussed them in two online meetings preceding the site visit. It found the SAR to be helpful and well-structured in addressing the scope of the focused review. The annexes provided examples of changes and revisions to processes that were described in the main document.

The site visit took place at THEQC's premises in Ankara on 20th and 21st July 2022. The schedule for the site visit and details of those interviewed may be found in appendix one of this report.

The review panel found the site visit to be informative and helpful in aiding it to come to its final conclusions and judgements. It was impressed with the transparency and honesty of the discussions that it was able to conduct with all groups of stakeholders, both internal and external, and noted in particular that THEQC began to work on feedback from the original review panel before it received the final report of that panel. The work carried out by the agency in response to its first ENQA review report has, therefore, been an ongoing and iterative process with the agency refining its approach and responses to the 2019 review panel's oral feedback, the final review report, and the decision letter from EQAR. The 2022 review panel found this to be a commendable approach in responding to all feedback with care and due consideration (commendation I).

QUALITY ASSURANCE SYSTEM OF THE AGENCY AND MAIN CHANGE SINCE 2019

The Turkish Higher Education Quality Council (THEQC) was founded in 2015 with the name of "Turkish Higher Education Quality Board" based on the "Higher Education Quality Assurance

Regulation." It was reorganised and renamed as the THEQC by law in 2017 (Law No. 2547 on Higher Education, Additional Article 35 (18/6/2017-7033/18 art.). THEQC is the only national authority in charge of quality assurance (QA) in the Turkish higher education system. Its mission is to strengthen QA systems in higher education in order to contribute to the continuous development of higher education institutions (HEIs) in Türkiye and thus, the achievement of universal qualifications by individuals. Its vision is to be an effective and internationally recognized institution in the higher education quality assurance field.

THEQC's main responsibilities are:

- the external evaluation of HEIs
- the coordination, authorization and recognition of discipline-focused accreditation agencies and
- ensuring the internalisation and dissemination of QA culture in HEIs.

The SAR finalised in June 2019 for the ENQA review describes the Turkish Higher Education Quality Assurance System as comprising, "...the principles regarding the processes of internal and external QA in higher education as well as the authorization and recognition of independent external evaluation and accreditation agencies...". THEQC evaluates the internal QA systems of institutions via Institutional Self-Evaluation Reports (ISERs) which are submitted annually by all HEIs. The Institutional External Evaluation (IEE) Programme evaluates institutions' procedures related to education and research-development activities and their administrative systems within the scope of the Institutional External Evaluation Criteria. Higher education institutions are required to take part in the Programme at least once every five years.

At the time of the 2019 ENQA review, the main external evaluation methodology was the IEE programme. During the site visit in 2019, the review panel heard that the agency was planning to move very soon from institutional external evaluation to institutional external accreditation (the Institutional Accreditation or IAP Programme). The key difference between the two processes is the outcome: IEE was described by THEQC as a 'friendly process' with a focus on evaluation and support. The outcome of the IAP is a published accreditation decision. A pilot project was to be launched in 2020 in order to test the process in view of future implementation. For this reason, the scope of the current focused review in 2022 included the standards of ESG Part 2 (ESG 2.1-ESG 2.7) for the IAP insofar as there were any differences between it and the IEE programme in relation to, for example, consistency in decision making, panel composition, decision making body etc.

FINDINGS: COMPLIANCE OF THEQC WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 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.

Response and judgement by EQAR, March 2021

The EQAR Register Committee noted that, in the 2019 review, the panel had some concerns regarding the design of methodologies and other related documents, which were, at the time, only discussed by the agency's Council with no further consultation being carried out with THEQC's stakeholders. Analysis in the 2019 report further indicated that student participation in THEQC's activities was limited compared to that of other Council members, as no student was included in any of the Council's commissions. In their response to the rejection of registration, THEQC provided evidence to the EQAR Register Committee that students now actively participate in two additional committees: there is now a Student Commission, and the chair of that body sits on THEQC's Council. However, this committee underlined that the effectiveness of stakeholder involvement in the agency's governance and work has yet to be fully reviewed in practice, in particular with regards to stakeholder consultation in the design of methodologies.

In addition to the matter of stakeholder involvement in the agency's work discussed above, the ToR for the focused review also requested that the standards of ESG Part 2 (ESG 2.1-ESG 2.7) should also be addressed in relation to the Institutional Accreditation Programme (IAP) insofar as this procedure differs from THEQC's Institutional External Evaluation (IEE) activity, since the former is in the process of replacing the latter.

Evidence

In addition to the SAR, the panel was able to access various documentary evidence as provided by THEQC. In relation to the issues raised under standard 3.1, in particular, the following documentation was key:

The Quality Ambassador Handbook

The Institutional Accreditation Programme Handbook and

The thematic analysis questionnaire which asks for HEIs' input into developing data around outcome-orientated internationalisation in HE.

The panel was also able to discuss the listed issues during the site visit, particularly during interviews with the President and senior management of the agency, members of staff responsible for the various

activities and external stakeholders including representatives from universities; students; reviewers and other stakeholders such as employers.

Analysis

Stakeholder involvement

At an interview with the senior management, the panel was informed that efforts have been made to ensure that the stakeholder voice in general is more evident at Council level and that stakeholder views are sought with a view to improvement for processes and methodologies. All such feedback is provided directly to the relevant commission(s). HEI representatives that spoke to the panel said that they have already been consulted as a part of the mid-term evaluation of the IAP and have provided feedback on the process overall and on specific elements such as guidance documents.

In addition to evidence that it heard from reviewers and representatives of HEIs who all spoke of their role in providing feedback to the agency on its processes, methodologies, and work in general, the review panel discussed two particular examples which exemplified the extent to which THEQC seeks the input of its external stakeholders. The first example was of a project carried out in partnership with the British Council on micro-credentials which actively seeks to bring together employers to invite them to discuss their needs to consider whether and how micro-credentials and any process by which they are assessed would help to serve those employer needs. The second example is that of work by the agency to gather international data on higher education in Türkiye. In this case, THEQC makes active use of institutional expertise to guide the development of the agency's approach to the collection of data in this field.

In general, the panel heard evidence from all external stakeholders, including the the Council of Higher Education (CoHE), about the extent to which the agency communicates with them for both information and consultation purposes. HEIs in particular, were clear about the role that THEQC has played in the development of a quality culture and IQA processes and systems across the Turkish HE sector. They also informed the panel that they were able to clearly identify where their feedback has been taken on board and incorporated into THEQC processes and methodologies. Reviewers told the panel that they had provided detailed feedback on the rubrics that they now use to make judgements and were very clear that the agency and its review panels now place an appropriate emphasis on ensuring clarity of and consistency across the decision-making processes in the IAP.

Student involvement

The review panel's meeting with students was extremely informative and provided strong evidence of the extent to which students are now involved in the work of the agency. A Student Commission has been set up and the panel met with representatives from that body as well as student evaluators and chairs and members of Students' Quality Societies from various universities. These latter work with THEQC to promote the role of students in their HEIs' internal QA processes and all students were involved in the development of the Quality Ambassador Handbook which is specifically written for students. This handbook is a clear and dynamic document which explains THEQC's role and function and its evaluation and accreditation processes. It also sets out the work of the Student Commission. In the view of the panel, the Quality Ambassador Handbook is a commendable publication and one which is valued by students (and indeed the review panel) for its straightforward clarity.

The review panel discussed the application process for membership of the Student Commission with the students (there were 109 applicants during the first year for 8 seats) and was informed that diversity is valued in the Commission. Students recognised that a membership of 8 is not representative of the student body across the Turkish HE sector. However, they argued persuasively that the Commission is still quite new and that they are happy to embed that body and learn from the first few years before widening the membership. In addition, the students saw themselves very much

as student ambassadors for internal QA at their own institutions and saw this as an equally important role to that of being a member of the Student Commission.

In the documentation read by the panel, it appeared that much of the work carried out by the Commission is led by the Chair, who represents the Commission in all other THEQC Commissions and is a member of the Council. This was confirmed in discussion with students and the panel would suggest that the workload of the Student Commission be more evenly distributed among its members.

Student evaluators confirmed that they are treated equally with all other professionals in all aspects of their work on an evaluation panel.

In conclusion, the review panel found the agency's engagement with students to be commendable.

IAP in relation to part two of the ESG

The panel was informed by THEQC's senior management during the site visit that only a very small number of institutions remain to be evaluated through the old IEE process (this process was seen as one that prepared institutions for IAP and will remain as part of the agency's portfolio of activities for use in the initial evaluation of any new higher education institutions (HEIs)). IAP is now established and fully functional and builds on the outcomes of the IEE process by examining the internal quality assurance system (IQA) of an institution with a view to evaluating its effectiveness. One of the key differences that was pointed out to the panel was in relation to the publication of reports where, under the IEE process, reports were published; the reports continue to be published in full under the IAP process and now include an accreditation decision (see also 2.6).

Staff at the agency stressed that, although the two processes are similar in terms of methodology, they differ in relation to the outcome, and this is evidenced in the new Complaints and Appeals process (see also 2.7) and in the approach to ensuring consistency of decision making. Reviewers who spoke to the panel described how their training has been adapted to include case study sessions on ensuring consistency of approach and of decision-making. They also described the agency's approaches to moderating the decisions and judgements that the review panels reach, again with a view to ensuring consistency of outcomes. Both of these were viewed by the agency and by reviewers as improvements (rather than changes) to process in relation to standards 2.7 and 2.5.

In respect of ESG 2.1, 2.3, 2.4 and 2.5 there are no differences to report by the panel, although some areas have been strengthened in response to comments and recommendations/suggestions in the ENQA review report of April 2019 (e.g., see above for example in relation to 2.5). In respect of 2.2, the panel noted that all stakeholders were clear about their involvement in the development of the IAP process. Reviewers in particular were able to clearly articulate the difference in the outcomes of IEE and IAP. Institutional representatives did not articulate this difference so clearly but all those who had participated in the IAP process so far were clear about their role in its development and in the process that they had undertaken, including the decision-making and reporting.

Panel commendations

2. The Quality Ambassador Handbook is a commendable publication and one which is valued by students (and indeed the review panel) for its straightforward clarity.

3. THEQC's engagement with students in both its own work and the support it provides to students in relation to IQA at their own institutions.

Panel suggestions for further improvement

- I. That the Student Commission considers distributing its workload more evenly across its members.

Panel conclusion: compliant

ESG 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.

Response and judgement by EQAR, March 2021

While the EQAR Register Committee noticed the increase in the number of permanent staff, the Committee considered that the agency is still relying to a large extent (14 of 35 staff members) on experts and consultants that are at the same time on the payroll of higher education institutions. This could constitute a conflict of interest for obvious reasons.

The EQAR Register Committee thus concluded that the panel's concerns related to THEQC's operational independence have not been fully addressed and concurred with the review panel that THEQC complies only partially with ESG 3.3.

Evidence

The agency's Board and its Commissions include academic staff employed by universities. These university staff members all formally sign a statement of ethical principles. The underpinning Code of Ethics was provided to the panel as annex 5 of THEQC's submission of documents and is published on its website. From responses across the full range of those interviewed, it was clearly demonstrated to the panel, often unprompted, that ethics are fully understood and adhered to. When the outcomes of specific activities are discussed at meetings, evidence was provided that conflicts of interest were pro-actively managed. Members who may have real, potential, or perceived conflicts of interest are absent from meetings and/or not assigned to activities where conflicts could arise.

The Agency still has a significant number of "experts" who remain on the payrolls of different universities. This group is partly (i) a legacy from the initial establishment of the agency when it was entirely staffed by those seconded/reassigned from universities and (ii) a means of maintaining staffing levels when insufficient permanent posts have been allocated/approved by Directorate General of Personnel affiliated to the Presidency of the Republic of Türkiye. Significant steps been taken by the agency to increase the number of staff employed directly, as can be seen from the table below;

Type	2019	2020	2021	2022 (SAR)	2022 (Site Visit)
Permanent Staff	10	21	28	29	29
Academic Experts	8	7	10	11	12
Consultants (Including International Consultants)	5	5	9	11	9

Part-time consultants are engaged. These are both part-time staff seconded from local universities and international. Again, clear ethical boundaries for such roles were consistently reported to the panel.

Analysis

Across all meetings, the review panel saw understanding by the agency of the importance of maintaining demonstrable independence and autonomy. Notwithstanding that some staff are employed by universities, it was clear that steps had been taken to ensure that the outcomes of operations could not be influenced inappropriately. Furthermore, it was repeatedly evident from the panel's meetings with evaluators, student representatives, stakeholders, and universities that the experts seconded from universities were totally embedded in the agency with their universities having no influence on nor, indeed, vested interest in, their role in the agency. More generally, the reassignment of employees from one nationally funded body (including universities) to another is normal practice in Türkiye. The panel therefore concluded that the agency has, in all practical respects, full responsibility for its operations.

The review panel believes that the agency could further strengthen its demonstrable independence and autonomy by continuing on the path of growing the proportion of staff permanently employed by the agency and diminishing the use of seconded experts. For similar reasons, the agency could also consider how best to ensure an "arm's length" task-specific relationship with local consultants. As local and international consultants clearly form two distinct groups, the panel suggest that this might be reflected in how they are organised, for example, non-local consultants may be usefully structured as an International Consultants Forum or International Advisory Committee.

The next ENQA review panel will want to consider this aspect of the agency's independence during the next review in order to follow THEQC's continuing journey in this respect as it gains in maturity and experience.

Panel suggestions for further improvement

2. That THEQC continues on the path of growing the proportion of staff permanently employed by the agency and diminishing the use of seconded experts.
3. That THEQC considers how best to ensure an "arm's length" task-specific relationship with local consultants. For example, retained non-local consultants may be usefully structured as an International Consultants Forum.

Panel conclusion: compliant.

ESG 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.

Response and judgement by EQAR, March 2021

The EQAR Register Committee noted THEQC's recent development of an internal quality assurance system, in line with the results of the Plan-Do-Check-Act methodology and the 2019-2023 Strategic Plan.

The EQAR Register Committee underlined in their rejection letter of 2021 that the effectiveness of THEQC's internal quality assurance system to foster continuous improvement in its processes is still to be reviewed in practice as the current improvements are not a result of the agency' internal QA system but a result of external feedback. The EQAR Register Committee further considered that the internal QA system should be designed to further support the successful implementation of the agency's activities in particular considering THEQC's newly launched Institutional Accreditation Programme (IAP).

Evidence

The agency provided documented evidence (annex 6 of the SAR) with a consolidated flow chart of extensive interrelated internal quality assurance processes/procedures. During the interviews at the site visit, the review panel noted strong engagement between the agency, assessors, universities, and other external stakeholders in defining processes to ensure the quality and integrity of evaluations, approvals and accreditations. For example, in the IAP process, extensive training and use of rubrics were evident. Accreditation panel reports are examined at four levels to ensure observations are consistent with both the evidence-base presented and required standards. The review panel was provided with the Consistence Directive (annex 3 of the SAR) and a sample consistency evaluation report (annex 4 of the SAR) which exemplified the scrutiny at the four levels.

Analysis

Internal quality assurance processes are fully on-line and populated directly with data arising from processes which should ensure the objectivity and integrity of internal quality assurance. The review panel also saw and heard evidence from members of evaluation panels of enhancement of activities arising from reflections on experience particularly in the training of panel members and the updating of rubrics.

These systemic and coherent on-line internal quality assurance processes were implemented early in 2022 and are, therefore, yet to complete a full cycle where the outcomes can be related to specific enhancement of activities. Whilst the review panel was in no doubt as to the implementation of the processes, the extent of their effectiveness will be something that THEQC will want to monitor and that the next ENQA review panel will want to consider.

Panel conclusion: compliant.

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 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.

Response and judgement by EQAR, March 2021

As of March 2021, the EQAR Register Committee could not verify the publication of any Institutional Accreditation Program report, in particular not the report from the procedure finalised in 2020.

Considering the consistency of institutional external evaluation reports (ISER and IFR) the panel formed the view in 2020 that this was not systematically ensured. The EQAR Register Committee

thus underlined the panel's recommendation in their rejection letter on the need to also introduce mechanisms to ensure consistency not only for the structure of the reports but also of the depth of reports provided by the agency.

Considering the delay in the publication of reports and the concerns expressed by the panel regarding the content of review reports, the EQAR Register Committee concurred with the panel's conclusion that the agency complies only partially with ESG 2.6.

Evidence

The agency provided the review panel with a detailed process chart explaining the process for ensuring the consistency and content of reports and also for ensuring consistency across the entire IAP process (annexes 3 and 4 to the SAR and additional request at site visit). It also provided reports of Institutional Accreditation Program (IAPs) conducted from 2020 to 2022, which correspond exactly to the data published on the agency's website. Interviews revealed that reports are discussed on many levels and that reviewers, HEIs, and THEQC employees have systems in place for providing comments.

Analysis

The process diagram provided to the review panel was comprehensive and included all aspects of the reporting process such as changes to evaluator training and the validation process.

As evidenced in the documentation provided to the panel and through the THEQC website, it was clear that the reports of all completed IAP processes to date have been published. The only reports that have not yet been published are those from the institutional accreditation process that was launched in early 2022, and which have not yet gone through the whole process of moderation and validation.

The review panel is of the view that the agency has addressed all the pertinent issues regarding the consistency, content and the publication of IAP reports. It would only suggest that THEQC considers making their reports available in English in order to aid the internationalisation aspirations of both the agency and the Turkish HE sector.

Panel suggestions for further improvement

4. That THEQC considers making all the reports of its external QA processes available in English.

Panel conclusion: compliant

ESG 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.

Response and judgement by EQAR, March 2021

The EQAR Register Committee noted that the agency's Appeals Committee is not part of THEQC's organisational chart and that no information is provided on the members of the Appeals Committee.

Since it was unclear whether the new process of handling appeals is fully in place, the EQAR Register Committee remained unable to conclude that THEQC meets the requirement of the standard but concluded that THEQC complies only partially with standard 2.7.

Evidence

According to the panel and the discussion of the collected evidence, the agency meets all the requirements regarding the complaints and appeals processes. They established a separate commission that has no direct contact with the THEQC Council or leadership. The commission is included in the organisational chart of the agency which the review panel saw (and which is on the website), and the separate definitions are clear. The workflow of the Commission was set out in Annex 6 of the SAR.

A Complaints and Appeals Directive has been added to the 'Legislation' page under 'About us' tab on the official website. This is a separate document and was accessible to the review panel. The Directive also includes information about the organization of the Complaints and Appeals Commission; Commission members are determined independently of the Council and in a way to avoid any conflict of interest, as follows:

- One of the Commission members should be a former Council member.
- One of the Commission members should have experience in evaluation processes.
- One of the Commission members should have administrative experience in an accreditation agency.
- Current members of the Council cannot be members to the Commission.

The Commission members' term of duty is three years. One cannot be a Commission member for more than two terms. Currently two of the members are former Council members, one is a former external evaluator and the other is a representative of the stakeholder institution (the Vocational Qualifications Authority).

The process for dealing with a complaint or an appeal is managed through the agency's information management system. As set out in the Directive, a preliminary review of the appeal or complaint uploaded to the system is made by the Commission secretariat within 7 days. Following the preliminary examination, the appeal or complaint is placed on the agenda of the Commission and the relevant parties are contacted if additional information and documents are needed. The Commission evaluates the appeal/complaint within 30 days and submits its deliberations to the Council. The Council makes its final decision within 30 days and with the decision then being communicated in writing to the party concerned.

Analysis

The review panel received positive feedback from all interviews in relation to the complaints and appeals process and it was clear that all interviewees were familiar with the newly implemented complaint and appeals processes. However, due to the lack of complaints and appeals to date, the panel was unable to analyse the effectiveness of the new process. The review panel discussed with the agency the possibility of separating the complaints and appeals elements so that they are the responsibility of two different bodies in order to ensure greater transparency in decision-making. However, since no official complaint or appeal had been received yet, the panel does not believe that a formal suggestion is useful at this stage.

THEQC will wish to monitor the efficacy of the new complaints and appeals process as it further embeds and is used in practice; the review panel will also want to follow-up on this during the next ENQA review.

Panel conclusion: compliant

ADDITIONAL OBSERVATIONS (optional section)

Overall, the review panel was presented with evidence during this focused review that THEQC had taken seriously all comments, suggestions and recommendations made in both the ENQA review report of April 2020 and the Register's decision letter of March 2021 and had worked steadily and effectively to address the matters raised in both. The fact that the self-assessment report for the focused review contained not only responses to the ESGs judged as partially compliant by the Register Committee but also the follow-up report to ENQA provided the panel with a fuller picture of the interconnectedness of many of the actions taken (for example, the involvement of students as stakeholders in the agency's work) and this presented a more nuanced picture of the distance travelled by THEQC since its first ENQA review in 2019-2020.

Nevertheless, various new and revised policies and processes (in particular relating to ESG 2.7 and 3.6) remain to be tested. This is not yet within the control of the agency (there have not been any complaints or appeals in the period since the new process was introduced and it is still too early for a full evaluation of the recently introduced IQA process). However, the review panel is of the opinion that the agency has responded appropriately to recommendations and comments in relation to both standards and that the most effective way of evaluating actions taken will be via THEQC's next ENQA review.

CONCLUSION

SUMMARY OF COMMENDATIONS

1. The thorough and incremental approach that it has taken to respond to all recommendations and comments made via the ENQA review process and the EQAR decision-making process.
2. The clear and useful Quality Ambassador Handbook (3.1).
3. The extensive involvement of students across the work of the agency (3.1).

SUGGESTIONS FOR FURTHER IMPROVEMENT

1. That the Student Commission considers distributing its workload more evenly across its members (3.1).
2. That THEQC continues on the path of growing the proportion of staff permanently employed by the agency and diminishing the use of seconded experts (3.3).
3. That THEQC considers how best to ensure an “arm’s length” task-specific relationship with local consultants. For example, retained non-local consultants may be usefully structured as an International Consultants Forum (3.3).
4. That THEQC considers making the reports of its external QA processes available in English (2.6).

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, THEQC **complies** with ESGs 2.6, 2.7, 3.1, 3.3 and 3.6. The panel is also satisfied that THEQC **complies** with standards 2.1-2.7 of the ESG in relation to its IAP process.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
12.07.2022 - Online panel meeting: to confirm agendas etc.			
	10.00 (60 mins)	Review panel's kick-off meeting and preparations for site visit	
20.7.2022 – Day I			
	09.00	Review panel's pre-visit meeting and preparations for day I	
	09.30	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting	Branch Manager
1	10.00	Meeting with the CEO and the Chair of the Board (or equivalent)	President
	11.00	Review panel's private discussion	
2	11.15	Meeting with the team responsible for preparation of the self-assessment report	Consultant, Internal quality assurance Expert, International relations Expert, International relations
	11.45	Review panel's private discussion	
3	12.00	Meeting with representatives from the Senior Management Team	Council Member and Head of Commission on Institutional External Evaluation and Accreditation Council Member and Head of Commission on Publicity and Stakeholder Relations

			Council Member and Head of Commission on Interntional Relations Council Member and Head of Student Commission Head of Commission on Complaints Appeals Secretary General
	13.00	Review panel's private discussion and lunch (panel only)	
4	14.15	Meeting with key staff of the agency/staff in charge of external QA activities (focused on the two key activities that are in the scope of the review)	Expert, QA activities Expert, Trainings for QA activities Expert, Student QA activities Statistician Expert, IT
	15.15	Review panel's private discussion	
5	15.30	Meeting with other departments/key body of the agency	Financial Services Specialist Expert, Translator&Interpreter Expert, International relations Expert, Accreditation Agencies Expert, Publicity and Stakeholder Relations Expert
	16.30	Review panel's private discussion: wrap up and preparation for day 2	
	17.30	Review panel departs	
21.7.2022 - Day 2			
	09.00	Review panel's private meeting	
6	09.30	Meeting with ministry representatives (where relevant)	Ministry of National Education (MoNE) Council of Higher Education (CoHe)

			Vocational Qualifications Authority (VQA)
	10.15	Review panel's private discussion	
7	10.30	Meeting with representatives of some reviewed HEIs focusing on the two processes in scope)	Rector of Ankara University Rector of Ege University Rector of Sakarya University Vice-Rector of Başkent University Rector of Eskişehir Technical University Rector of Malatya Turgut Özal University
8	11.30	Meeting with representatives from the reviewers' pool	Institutional external evaluation and Institutional accreditation; team member Institutional external evaluation, Institutional accreditation and Follow-up; Team head and team member Institutional external evaluation, Institutional accreditation and Follow-up; Team head and team member Institutional external evaluation, Institutional accreditation and Follow-up; Team head and team member
	12.15	Lunch (panel only) and private meeting to discuss findings	Consultant, Internal quality assurance

		Lunchtime meeting 12.20-12.40	Expert, International relations Expert, International relations Branch Manager
9	14.00	Meeting with students	Karabük Univ. Quality Ambassador Head, ESU pool İstanbul Medipol Univ Quality Ambassador; Student Evaluator Başkent Univ. Quality Ambassador Head; Student Evaluator; ESU pool Galatasaray Univ. Quality Ambassador Head; Student Evaluator Muğla Sıtkı Koçman Univ. Quality Ambassador Head; Student Evaluator Marmara Univ.; Student Commission Member Atatürk Univ. Quality Ambassador Head; Student Commission Member; ESU pool
	14.45	Review panel's private discussion	
10	15.00	Meeting with other stakeholders to include employers	TURAK President

			SABAK President YÖDAK (North Cyprus) CEENQA Vice-president British Council, Director of Education Business Sector; Ankara Chamber of Commerce Member
	15.45	Private panel meeting to finalise feedback	
11	16.30	Feedback to THEQC	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

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

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

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

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

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

Chapter 2: Purpose and scope of the focused review

Chapter 2.1: Activities within the scope of the ESG

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

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

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

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

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

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

Chapter 2.2: Content and preparation of the review report

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

The focused review foresees a site visit to the agency.

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

Chapter 3: Panel composition

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

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

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

The proposal is to employ:

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

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

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

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

Chapter 4: Timeline

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

Chapter 5: Costs

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

Chapter 6: Annexes

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

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

ANNEX 3: GLOSSARY

This section provides an alphabetical listing of the abbreviations mentioned in the report, to be written out in their first use in the text and abbreviated each time thereafter. This box to be deleted before publishing.

ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report

...

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY THEQC

- THE SELF-ASSESSMENT REPORT OF THEQC FOR THE PARTIAL REVIEW OF THEQC WITH A FOLLOW-UP ON THE ENQA REVIEW 2019
- Annex 1. Sample IAR
- Annex 2. Sample ISER Feedback Report
- Annex 3. Consistency Directive
- Annex 4. Sample Consistency Evaluation Report
- Annex 5. Sample Accreditation Decision Letter
- Annex 6. Process cards - Workflow - RACI Matrix
- Annex 7. Invitation letter and visit program for the International Advisors
- Annex 8. Stakeholder activity table
- Annex 9. Sample report for 2020 Follow-up Program
- Annex 10. Blended Visit Plan

- DOCUMENTS PROVIDED DURING THE SITE-VISIT
- Example of a Council decision (Council members shall not attend the meetings in which the Council deliberates on their institutions)
- Current numbers of the Institutional Accreditation Program
- Example of a THEQC's internal quality assurance sub-process (chart for IAP)
- Thematic analysis questionnaire outcome-oriented internationalisation in HE
- THEQC staff by numbers

- ADDITIONAL DOCUMENTS SEEN AT THE SITE VISIT AND SUBSEQUENTLY PROVIDED TO THE PANEL IN ELECTRONIC FORMAT
- Additional Document for Complaints and Appeals
- Annex 1 Complaint and Appeals Process Flowchart

ENQA AGENCY REVIEW 2022

THIS REPORT presents findings of the ENQA Agency Review of the Turkish Higher Education Quality Council (THEQC), undertaken in 2022.

enqa.

European Association for
Quality Assurance in Higher Education