



European Association for  
Quality Assurance in Higher Education

Dr. Christina Besta  
Director General  
Hellenic Authority for Higher Education (HAHE)  
1 Aristidou & 2 Evripidou Str.  
10559 Athens  
Greece

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**Subject: Statement on validation of the external review report of HAHE**

Dear Dr. Christina Besta,

I would like to inform you that, at its meeting on 5 September 2022, the ENQA Agency Review Committee validated the external review report of HAHE. The Committee concluded that the report has been produced in accordance with the Guidelines for ENQA Agency Reviews. This is in line with article 26, paragraph 2 of ENQA's Rules of Procedure, which states that the review report can be further used only once this statement of validation has been issued. The purpose of this statement is to set out the committee's views on the quality of the final report and consistency of the panel's evaluation on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The committee made the following observations on the review report that was submitted for scrutiny:

On the ESG 2.4, the committee analysed the additional information that was provided by the panel, following the committee's request dated 10 June 2022. In their response, the panel noted HAHE's systematic efforts in training of experts, the existence and applicability of criteria for panel composition, managing of possible conflict of interest, and involvement of international experts. Furthermore, the committee discussed whether the lack of student involvement in the agency's external quality assurance is critical to HAHE's non-compliance on this standard, as judged by the panel. Since the requirement of ESG 2.4 on this matter is fundamental, and student involvement is crucial to the spirit of (external) quality assurance in the EHEA, the committee agreed with the panel's judgement on the agency's non-compliance with this standard.

Secondly, in relation to ESG 3.4, the committee concluded that HAHE is non-compliant with this standard due to the lack of the agency's activities related to thematic analysis. In the panel's response to the committee's request dated 10 June 2022, the panel stated: "The review panel considers that the standard 3.4 is indeed not formally met in its entirety at this stage of the development of the agency. This is partly due to the status and missions of the agency that led it to focus on accreditation and financing criteria



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rather than on qualitative items in this early stage. But the review panel also considers that the quantity and nature of the data collected by the agency will allow it to implement rather easily real thematic analysis in the near future, although no precise information or planning about it has been provided to the review panel". Following this, in the opinion of the committee, the standard can be considered only as non-compliant with the ESG.

Should HAHE be dissatisfied with the above analysis of the ENQA Agency Review Committee, or the conduct of the review process or those carrying it out, it may file a complaint according to the procedures outlined in article 23 of ENQA's Rules of Procedure.

Next steps: following its validation, the review report can be used to apply for ENQA membership and EQAR registration, as well as for any other purposes, should the agency decide so. As for the agency's ongoing membership in ENQA, if HAHE decides not to apply for renewal of ENQA membership, the membership will discontinue on the last day of the existing membership period, i.e., until 26 October 2022.

This statement will be published on ENQA's website as an annex to the review report.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,

ENQA Agency Review Committee

Annex: Areas for development

## **Annex: Areas for development**

As outlined by the review panel and further discussed by the committee (where relevant), HAHE is recommended to take appropriate action, in so far as it is empowered to do so, on the following issues:

### **ESG 3.1 Activities, policy, and processes for quality assurance**

The panel recommends the agency to develop mechanisms for the more explicit inclusion of stakeholders in its QA processes and activities.

The panel recommends the agency to use its data-collection processes as a tool to develop a proactive and more strategic planning-oriented approach.

### **ESG 3.4 Thematic analysis**

The agency should examine the work in thematic analysis carried out by other agencies in order to broaden its understanding of this topic and to provide it with benchmarks for its own performance.

The agency needs to broaden its engagement with qualitative analysis and encourage all HEIs to do the same.

### **ESG 3.5 Resources**

The agency needs to establish a secure and adequate financial basis for its activities.

The agency needs to secure a staffing complement that reduces its reliance on short-term contracts for its QA activities.

### **ESG 3.6 Internal quality assurance and professional conduct**

The agency should develop a comprehensive set of written procedures covering all of the gaps identified in this section, so that the security of the processes does not rely solely or mainly on the custom and practice of any person or entity in HAHE.

The agency should develop a structured plan for its internal quality assurance that has annual reviews built into it.

The agency should engage external advice to assist it in developing its internal quality assurance culture.

### **ESG 2.2 Designing methodologies fit for purpose**

The SC of HAHE should develop strategic proposals aimed at strengthening stakeholder engagement.

HEIs should be given a much bigger input into the development, testing and review of any proposed new procedures.

All existing procedures should be reviewed and amended on a planned, cyclical basis.

Stakeholders need a much greater level of involvement in all HAHE procedures and activities.

The exclusion of certain categories of reviewers from IQAS reviews should be removed.

### **ESG 2.3 Implementing processes**

The agency should prepare a comprehensive qualitative analysis of its follow-up reports. It should consider the findings and conclusions from this analysis and use them to systematically inform a review of the procedure.

### **ESG 2.4 Peer-review experts**

The agency needs to develop an effective training programme for student experts and should get advice and guidance from other agencies on how to do so.

The agency should assume a national leadership role in developing a meaningful student representative system.

The gender balance issue on HAHE's register of experts and on individual panels should be vigorously addressed.

### **ESG 2.5 Criteria for outcomes**

Specific training and briefing material should be developed for HAHE staff and all reviewers covering the requirements for regulated professions at both national and European level.

The agency should work with the HEIs to ensure and assure the primacy of enhancement in its criteria and outcomes.

### **ESG 2.7 Complaints and appeals**

A full review of complaints and appeals procedures should be undertaken that addresses the transparency and independence of processes used.