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Brussels, 2 May 2023

Subject: Statement on validation of the external review report of IKCA

Dear Mr. Begaly Khalmuratov,

I am pleased to inform you that, at its meeting on 19 April 2023, the ENQA Agency Review Committee validated the external review report of IKCA. The committee concluded that the report has been produced in accordance with the Guidelines for ENQA Agency Reviews and can thus be used to apply for ENQA membership and EQAR registration, as well as for any other purposes. 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 examined the provided review report and asked the panel for minor revisions on the ESG 2.3. On this, the committee noted that the panel provided no reflection on the lack of a consistent follow-up to be provided by the agency for its external quality assurance activities. Rather, the chapter at times referred to the internal quality assurance procedures (e.g., surveys) of IKCA, which should rather be addressed under ESG 3.6. The committee thus asked the panel to check and revise the chapter accordingly.

Importantly, the committee wishes to use this opportunity to provide its views regarding standard 3.3 Independence, where its judgement differs from that of the panel as well. The committee noted that the agency's independence is not safeguarded since the agency's founder is deeply involved in the agency's various bodies and thus daily work. For a partial compliance on this standard to be reached, the agency should meet some aspects or parts of the standard, but equally important, the interpretation of the ESG standard should be correct, while the manner of implementation can be not effective enough (see ENQA's Guidelines on Agency Reviews, p. 25). Since the committee held no evidence that the agency's interpretation of the standard is correct, the committee found the agency to be non-compliant with the standard.



The committee received the final review report that addressed the additional requirements. The final review report can thus be further used to apply for ENQA membership and EQAR registration, as well as for any other purposes, as stipulated above.

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

Thank you for your trust placed in ENQA to conduct this review. If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,

Mr. Alastair Delaney

Chair of ENQA Agency Review Committee

Annex: Areas for development



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As outlined by the review panel and further discussed by the committee (where relevant), IKCA 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 agency is recommended to supplement the Strategic Development Plan with goals and objectives that are clearly related to the agency's mission, while being specific and measurable and allowing each staff member to relate to them and integrate them into their daily work.

The agency is recommended to involve external stakeholders and members of the agency's governing bodies in the governance of the agency in a more systematic and efficient way.

ESG 3.3 Independence

The agency is recommended to review its regulations and charter to ensure a clear separation of responsibility and authority between the agency's director, founder, and the governing entities and processes for the agency's accreditation processes, ensuring autonomy and independent decision-making processes for the agency's governing bodies.

The agency is recommended to develop and publish a transparent policy and procedure for the recruitment and selection of staff.

The agency is recommended to develop a transparent process and set of criteria for recruitment of external experts and internal governance for compiling and approving external expert groups.

ESG 3.4 Thematic analysis

The agency is recommended to add expertise and competence in quantitative and qualitative data analysis to its current resources, to enhance the agency's capacity to analyse data from external QA activities and for development of thematic reports that would increase public awareness and enhance quality of higher education in Kazakhstan.

The agency is recommended to insert an explicit statement within its strategic plan committing to the publication of thematic analyses on a predetermined periodic basis, such as one analysis per year and on relevant topics, with the actual publication of thematic analyses identified as key milestones in monitoring implementation of strategic goals.



ESG 3.5 Resources

The agency is recommended to develop a structured and systematic process for the professional development of staff.

The agency is recommended to invest to enhance the competence and skills of staff to support the future work and activities of the agency.

ESG 3.6 Internal quality assurance and professional conduct

The agency is recommended to review its internal quality assurance guidelines, internal regulations and its suite of quality assurance documentation to:

- a. remove inconsistencies and duplication within and between documents;
- b. clearly indicate the responsibility at all stages within the accreditation process;
- c. clearly indicate the feedback loops and monitoring stages.

The agency is recommended to establish internal mechanisms to enable systematic feedback and engagement from all staff in the strategic development and monitoring processes.

The agency is recommended to fully implement the functions of the Expert Councils and systematically embed the Expert Councils within the agency's consultation and improvement processes.

ESG 2.1 Consideration of internal quality assurance

The agency is recommended to align the standards published on the agency's website with the self-assessment guidelines.

The agency is recommended to take proactive measures and implement a process to ensure the accreditation reports follow the standards and criteria set out in the respective documents.

The agency is recommended to increase its emphasis on enhancing the understanding of the full meaning of ESG part 1, ensuring the implementation of ESG Part 1, focussing on the effectiveness of IQA rather than the availability of IQA, and addressing in particular ESG:

- (1.2) addressing the concept of outcome-based programmes in a more consistent way;
- (1.4.) including the recognition of non-formal and informal prior learning next to the recognition of academic studies;
- (1.7) rethinking the concept of information management and applying it as a complex tool for the development of IQA system;
- (1.9) addressing the periodic review of programmes in a more holistic way, taking into account all relevant aspects and involving students and other stakeholders.



ESG 2.2 Designing methodologies fit for purpose

The agency is recommended to establish more formal and systematic processes for involvement of external stakeholders in the development of and continuous improvement of EQA methodologies.

The agency is recommended to develop a policy on consultation and explore mechanisms to broaden and enhance its consultation processes.

The agency is recommended to establish clear rules and procedures for combining several study disciplines in one programme accreditation procedure to assure fitness for purpose and support the institution to improve the quality of programmes.

ESG 2.3 Implementing processes

The agency is recommended to ensure the full implementation of internal processes and templates to achieve consistency in implementation of the standards and criteria in its external evaluation reports from expert panels.

The agency is recommended to consistently ensure that the composition of an expert group allows the group to provide meaningful feedback to all programmes under accreditation.

ESG 2.4 Peer-review experts

The agency is recommended to establish transparent guidelines and criteria for the compilation of expert groups and the appointment of experts.

The agency is recommended to implement a comprehensive training programme for experts the effectiveness of which is periodically monitored and improved on.

ESG 2.5 Criteria for outcomes

The agency is recommended to review the regulations on accreditation, including standards for institutional and programme accreditation as well as standards for accreditation of medical institutions and programmes, to ensure clear criteria for decisions at all levels, from the assessment criteria expert reports and to the criteria for decisions as result of post-accreditation monitoring, so that all parties involved have an overview of the assessment criteria applied throughout the entire process.

The agency is recommended to implement proactive measures to develop understanding and capacity of staff members, experts and members of the Accreditation Council, on the need for consistency and methodologies to ensure consistency of decisions.



The agency is recommended to implement measures to support the Accreditation Council in following the criteria for decisions set in the regulations and published and ensure that any deviation from the rules should be thoroughly justified and made available for the public as part of the accreditation decision.

The agency is recommended to formalise and publish all decisions on withdrawal of accreditation, to include an accreditation report and initial accreditation decision.

The agency is recommended to ensure that the withdrawal of the accreditation decision as a result of the post-accreditation monitoring stays within the sole competence of the Accreditation Council.

ESG 2.6 Reporting

The agency is recommended to publish all accreditation decisions and reports, both positive and negative decisions, and correct all discrepancies with regards to missing reports on the agency's database.

The agency is recommended to establish a transparent process for the formal withdrawal of accreditation from an institution and removal of an institution from the IKCA register.

ESG 2.7 Complaints and appeals

The agency is recommended to make the procedures for filing complaints and making an appeal more visible and accessible on the website.