



European Association for
Quality Assurance in Higher Education

Dr. Christina Besta
Director General
Hellenic Authority for Higher Education (HAHE)
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Brussels, 22 December 2022

Subject: External review of HAHE and the Board's decision on complaint

Dear Dr. Christina Besta,

Following our meeting this morning with you and your President, Professor Pericles Mitkas we would like to inform you that, at its meeting on 13 December 2022, the ENQA Board discussed the complaint from HAHE as submitted on 21 October 2022. Following Article 23 of the ENQA Rules of Procedure, the complaint had been examined by the Appeals and Complaints Committee (ACC), which submitted a thorough report for the Board to make the final decision. The Board's decision was taken in light of the findings from the ACC as follows:

HAHE complaint regarding the panel's failure to take into consideration the factual errors identified by the agency, which effected the judgements on ESG 2.2, 2.4, 2.7, 3.4, 3.5, 3.6.

In their analysis of the agency's complaint and its impact on the judgements on ESG 2.2, 2.4, 2.7, 3.4, 3.5, 3.6, the ACC confirmed that the review panel followed the methodology of ENQA Agency Reviews and considered all information available until the end of site visit, which is formally the last point in time for the submission of information to the review panel. This is especially relevant for the review panel's findings under ESG 2.4, since the agency introduced changes to the involvement of students in the agency's review panels only after the site visit. **Following the findings of the ACC, the Board dismisses the agency's complaint and upholds the review panel's findings on ESG 2.2, 2.4, 3.4, 3.5, and 3.6.**

Regarding ESG 2.7, the ACC agreed with the review panel that the complaints and appeals processes of the agency should be clearly defined as part of the design of any external quality assurance processes but found that this could be more appropriately expressed as a suggestion for further improvement, not a recommendation. The ACC namely noted that HAHE has the appeals and complaints procedures defined, but the linkage to the particular external QA activity, and their consistent application in practice, is missing. In the view of the ACC, the agency can therefore be judged as compliant with the standard. **Following the recommendation of the ACC, the Board finds the agency to be compliant with ESG 2.7.**

Regarding ESG 3.4, the ACC agreed with the review panel's original findings as described in the review report and proposed that the Board dismiss the argumentation by the ENQA Agency Review Committee

(ARC) for the standard being non-compliant. In the view of the ACC, the standard does not prescribe how the thematic analysis should look. Rather, the relevance is in “that the agency is using its evaluation reports in the reporting of its work and not merely publishing the report outcomes without any analysis”. Therefore, in the view of the ACC, the review panel’s judgement of partial compliance with ESG 3.4 should be re-instated. Furthermore, in the view of the ACC, only the review panel’s first recommendation remains valid for the agency, i.e., “HAHE 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.” **In line with the recommendation of the ACC, the Board finds the agency to be partially compliant with ESG 3.4.**

Finally, it should be noted that the ACC found the following statements by the panel in the external review report on ESG 3.6 to be insufficiently substantiated and unrelated to the findings: “This is a very fragmented organisation” and “This helps explain the lack of real commitment to improvement in HAHE and the very limited understanding of the basics of internal QA.” Therefore, **the Board emphasises the irrelevance of those two statements for the review against the ESG.**

HAHE complaint regarding the review panel’s reference to oral evidence solely, without considering the agency’s written policies and other documents other or considering only evidence from year 2021.

In their report, the ACC listed examples of the review panel’s use of evidence other than oral evidence, for instance on ESG 2.4, 3.4, 3.5. Furthermore, the ACC noted that “much of the institutional SAR used for the 2022 site visit largely related to the period 2015-2019, in preparation for the original site visit of 2020”. **The Board follows the ACC’s findings on this point and dismisses the agency’s complaint.**

Further notes

The ACC concluded their analysis with a proposal for the agency to undertake a focused review, especially in relation to ESG 2.4, since the complete absence of student membership in review panels appears to have been implemented by the agency in the time following the site visit.

The Board recognised that the legal barriers to having student members of review panels have been removed and the agency has now started to include students in reviews. However, the Board would like to clarify that, following ENQA’s rules (Article 7 of Rules of Procedure¹), HAHE is not eligible for a partial review, as this option is only available to ‘members under review’ if a regular cyclical review is not due

¹ See here: <https://www.enqa.eu/wp-content/uploads/ENQA-Rules-of-Procedure-2021-1.pdf>



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before the end of their two-year period as 'members under review'. Following HAHE's full review this year, it is unfortunately not possible to further extend the status of 'member under review'².

Next steps

The above conclusions regarding the complaint submitted by HAHE bring the complaints procedure and review process to a close. Please note that the decisions of the ENQA Board regarding the complaint are final and non-appealable. The final review report of HAHE, the validation of the review report by the ENQA Agency Review Committee, and this letter from the Board shall be published on ENQA's website in the new year, as is the standard step for all completed reviews. The completion of the review process is independent from subsequent steps regarding ENQA membership and listing on EQAR.

When we met this morning, we discussed the options and consequences for HAHE regarding ENQA membership. We are committed to continued engagement with HAHE to provide support and advice in the present circumstances.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Douglas Blackstock', is written over a light blue horizontal line.

Douglas Blackstock
President

² Article 7(2) states that 'Members who become unable to comply with the ESG, and thus the membership criteria, during their five-year membership period will need to undergo either a partial review within two years, or their regular cyclical review, if it is due before two years' (the latter being the case of HAHE). An agency that, following the full review, 'still does not comply with the ESG and thus ENQA's criteria for membership shall, by confirmation of the General Assembly, be excluded from ENQA membership. The agency may reapply after two years' (Article 7(4)).