



European Association for
Quality Assurance in Higher Education

Ms. Saule Sarsenbayeva
Director General
Eurasian Centre for Accreditation and Quality Assurance in Higher Education and Health Care (ECAQA)
75, Karasay Batyr Street, 050029 Almaty
Kazakhstan

Brussels, 1 July 2022

Subject: Membership of ECAQA in ENQA

Dear Ms. Saule Sarsenbayeva,

I am pleased to inform you that, at its meeting of 22 June 2022, the Board of ENQA took the decision to grant the ECAQA membership of ENQA for five years from that date. The Board concluded that ECAQA is in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and thus fulfils the membership criteria according to article 6, paragraph 1 of ENQA's rules of procedure.

The Board would like to use this opportunity to provide an explanation regarding standard 3.3 Independence, where its judgement differs from that of the panel. The Board is concerned of the overall power and influence of the Director General within the agency, potential conflict of interest between ECAQA's external quality assurance activities and consultancy activities, and the risks arising from the close-knit academic medical community in Kazakhstan. Following this, in the opinion of the Board, the standard can be considered only as substantially compliant with the ESG, and not fully compliant.

Regarding ESG 2.6 Reporting, the Board notes that several aspects of the standard require further attention by the agency, such as the need to strengthen the agency's mechanisms for quality check of evaluation reports to ensure that they provide a thorough analysis based on relevant evidence, a consistent approach to addressing compliance with the agency's standards in the reports, and a timelier publishing of reports on the agency website. The Board thus asks the agency to address the listed recommendations and suggestions urgently and with due diligence.

All in all, the external review identifies several areas that require immediate attention of the agency, such as panel recommendations related to ESG 3.1, 2.5, 2.6, and 2.7. The Board strongly encourages the agency to provide sufficient attention to these recommendations and implement them. Should this not be addressed, the agency's compliance with the ESG and the linked membership with ENQA might be put at risk.



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The Board would like to receive a follow-up report within two years of its decision, i.e., by June 2024 where ECAQA is expected to address the panel's recommendations.

The Board also encourages ECAQA to take advantage of the voluntary progress visit – an enhancement-led feature in the review process. The visit would take place in about two years' time from this decision. The ENQA Secretariat will be in touch with you in about a year's time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the Guidelines for ENQA Agency Reviews.

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

Please accept my congratulations for the confirmation of membership of ECAQA.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Douglas Blackstock', is written over a light grey rectangular background.

Douglas Blackstock
President

Annex: Areas for development

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As outlined by the review panel, ECAQA is recommended to take appropriate action, 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 that the agency:

- (1) takes measures to separate clearly its external QA activities and consultancy services and ensure that it does not conduct QA activities in the same entity that has benefitted from its consultancy services within the scope of the ESG in the past six years.
- (2) puts in place a mechanism for structured engagement with its stakeholders to encourage their meaningful contribution to its activities and further development.

ESG 3.3 Independence

The agency is recommended to address the potential issue of overall power and influence of the Director General within the agency, potential conflict of interest between ECAQA's external quality assurance activities and consultancy activities, and the risks arising from the close-knit academic medical community in Kazakhstan.

ESG 3.4 Thematic analysis

The panel recommends that the agency adopts a systematic approach to identifying topics for its thematic analyses, with stakeholders to be involved in this process, take a more in-depth approach to analysing findings from its accreditation processes, and publish thematic reports on its website.

ESG 3.6 Internal quality assurance and professional conduct

The panel recommends that the agency:

- (1) reviews its external feedback mechanisms to ensure that it can collect constructive feedback which contributes to its continuous improvement.
- (2) puts in place formal mechanisms for collecting feedback from an External Expert Commission after each accreditation review, and for providing feedback to each Commission on its performance and the relevance of its recommendations to a reviewed HEI.

ESG 2.1 Consideration of internal quality assurance

The panel recommends that the agency cross-checks the standards for its accreditation processes to ensure that the key elements of ESG Part 1 are addressed in a consistent manner and to the fullest extent possible, while taking into account the specificity of each accreditation process.

ESG 2.2 Designing methodologies fit for purpose

The panel recommends that the agency puts in place a mechanism for structured involvement of all stakeholder groups in the design of its accreditation processes.

ESG 2.3 Implementing processes

The panel recommends that the agency revises its implementation arrangements for post-accreditation monitoring so that this phase is conducted as a follow-up to an accreditation review rather than a subsequent review ending with an accreditation decision which may invalidate the original decision granting full accreditation to an institution or programme.

ESG 2.4 Peer-review experts

The panel recommends that the agency:

- (1) provides separate training to students, addressing all accreditation standards and the role of students in external evaluation, refine its selection criteria for students to include QA expertise, and revise its guidelines on the role of students to ensure their full involvement.
- (2) ensures that its training and briefing for experts address Part 1 of the ESG as a QA framework for agencies and institutions in the EHEA;
- (3) considers providing financial reward to employers and students as a sign of recognition of the value of their work in External Expert Commissions.

ESG 2.5 Criteria for outcomes

The panel recommends that in order to ensure consistency in the application of the standards and in decision-making in the accreditation processes, the agency clarifies in its guidelines the extent to which an external evaluation should address basic and quality improvement sub-standards, and the extent to which compliance with the two kinds of sub-standards should be reflected in judgments made by External Evaluation Commissions.

ESG 2.6 Reporting

Further to the recommendation under ESG 2.5, the panel recommends that the agency:

- (1) strengthens its mechanisms for quality check of evaluation reports to ensure that they provide a thorough analysis based on relevant evidence;
- (2) ensures that evaluation reports consistently address compliance with the agency's standards, including the aspects covered by the ESG.

ESG 2.7 Complaints and appeals

The panel recommends that the agency clarifies the appointment procedure for, and the exact composition of, the Appeals Commission in its internal regulations; consider appointing some permanent members to



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the Appeals Commission to ensure consistency in the appeals process; and separate the decision-making of the accreditation and appeals processes by granting full decision-making power to the Appeals Commission.