

**ENQA Review of the Quality Assurance
Agency for the University System in Castilla y
León (ACSUCYL)
Report of the review panel**

December 2014

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1 Executive summary

This report analyses the compliance of ACSUCYL (The Quality Assurance Agency for the University System in Castilla y León) with the criteria for Full Membership of the European Association for Quality Assurance in Higher Education (ENQA). It is based on the findings of an external review conducted in September 2014.

In the light of the documentary and oral evidence, the panel's overall appreciation regarding the compliance of ACSUCYL with ENQA membership criteria is positive. The agency is aware of the ESGs, has engaged leadership and very committed staff and the stakeholders expressed satisfaction with the agency's work. The expert panel has, however identified a number of issues that require further development.

They are primarily:

- The external stakeholders (in particular senior management of HEIs and employers) might be more actively involved in the development of new procedures (ESG 2.2) and could have a more active role related to ESG 2.8 (system wide analysis) and (ESG 3.8) the agency's accountability procedures. This might also help the agency in pursuing a more strategic role in EQA in Castilla y León. The panel therefore finds ACSUCYL is substantially compliant in regards to these three ESGs.
- Currently ASCUCYL's procedures are strong on efficiency and the more administrative aspects but the agency could be stronger on the essential qualitative, evaluative and academic aspects of its ex-post degree reviews. It is the panel's opinion that the agency should work on this issue, but its' current plan to undertake a high amount of ex-post degree accreditation procedures does not seem to provide opportunities for developing the qualitative aspects of the reviews. Overall, the panel finds that ACSUCYL is substantially compliant to ESG 2.4 (processes fit for purpose) and ESG 3.7 (criteria and processes used by the members). However, it has to be taken into account that these issues are grounded in the overall Spanish EQA system in HE.
- The agency has been subjected to considerable budget cuts since the last review due to the unfavourable economic situation in Spain. The panel acknowledges that ACSUCYL has handled this situation remarkably well. However, there is a risk that the agency is continuously overburdened with too many tasks and responsibilities and will not comply to ESG 3.4 (resources) in the future The agency should work with the national and local

governments and other stakeholders to develop less resource intensive EQA concepts that are more fit for purpose; for example by considering the opportunity of shifting to institutional/audit approaches.

Finally, the panel provides some suggestions for the improvement of the appeals procedure of the agency.

In the light of this assessment, the panel recommends to the Board of ENQA that Full Membership of ENQA is confirmed for a further period of five years.

2 Glossary

ACSUCYL	Quality Assurance Agency for the University System in Castilla y León
ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
HEI	Higher Education Institutions
EHEA	European Higher Education Area
SER	Self-evaluation Reports
IQA	Internal Quality Assurance
EQA	External Quality Assurance

3 Introduction

3.1 Background of the review

The Statutes of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions. In November 2004, the General Assembly of ENQA agreed that the third part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be incorporated into the membership provisions of its (then) regulations (now statutes). Substantial compliance with the ESG thus became the principal criterion for membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005. The third part of the ESG covers the cyclical external review of quality assurance and accreditation agencies.

The external review of ACSUCYL was conducted in line with the process described in Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with the timeline set out in the Terms of Reference.

External reviews may be coordinated nationally or by ENQA and may be of type A or B. Type A reviews are intended solely to assess the extent of the agency's compliance with ENQA's membership criteria / ESG, while type B reviews also cover other aspects of the agency's work or organization. ACSUCYL underwent its first external review in September/October 2009. It was a type A review, initiated by the Agency to have its compliance with the ESGs assessed, and it was coordinated by the Center for Accreditation and Quality Assurance of the Swiss Universities (OAQ). According to the Terms of Reference for the review, it aimed to *“assess the degree of fulfilment of all ENQA membership criteria specified in the European Standards and Guidelines for Quality Assurance in the European Higher Education Area”*. As a result, ACSUCYL was granted Full Membership of ENQA in February 2010 as stated in the letter from the ENQA board to ACSUCYL:

“On the basis of its scrutiny of the final review report on ACSUCYL, the ENQA Board and its Review Committee agreed that ACSUCYL met the necessary requirements for being granted ENQA Full Membership. Though the ENQA Board concluded that ACSUCYL is in substantial compliance with the European Standards and Guidelines, it found that there were some areas for development, included in Annex 1 to this letter. ACSUCYL should submit a

progress report on these areas no later than February 2012, and they will also be considered in conjunction with the next external review.”

Two years later ACSUCYL sent a progress report regarding follow-up activities undertaken according to the ENQA recommendations. The report was approved by ENQA in April 2012.

The current review is a type A review.

3.2 Review process

The 2014 external review of ACSUCYL was conducted in line with the process described in the Guidelines for external reviews of quality assurance agencies in the EHEA and in accordance with the timeline set out in the Terms of Reference.

It was established in the review of 2009 that ACSUCYL in general fulfilled the ESGs, and the panel has noted that the agency has followed the recommendations in the report. On this basis, the expert panel of 2014 has focused (during the second review) on ways in which the agency can further improve its activities and functions in the current context. The panel has primarily paid attention to ACSUCYL's procedures related to the direct EQA of education which is the focus of the ESGs and less on ACSUCYL's tasks related to EQA of research and teacher qualifications.

The panel for the external review was appointed by ENQA and was composed of the following members:

- Teresa Sánchez Chaparro, Executive Director, Commission des Titres d'Ingénieur (CTI), France – Chair.
- Asnate Kažoka, Student in IT Project Management (Master's degree), Riga Technical University.
- Milena Georgieva Kirova, Professor, Head of Department, University of Sofia.
- Oliver Vettori, Director of Program & Quality Management, Vienna University of Economics and Business.
- Christian Moldt, Director of Quality, University College Zealand – Secretary.

The panel received an excellent well-written and structured report and all the necessary documents for the assessment. It is a strong point that ACSUCYL in the SER has highlighted the changes implemented in order to follow the recommendations of the last report, and has given (SER, chapter 7) its own view on the agency's main areas for improvement. It is

another strong point that staff members have been involved in the writing of the SER through an internal working group in the agency.

The visit was well planned and organized, with a very intensive agenda including a site visit of the Agency's office facilities. In one meeting Skype was used for the interview with Fiona Crozier – member of the Advisory Board. A translator was present at all meetings. The staff of the agency demonstrated high professionalism during the entire review process and provided excellent assistance to the panel regarding all matters. At the final meeting the panel presented its main preliminary conclusions to the agency.

In the course of the review process, ACSUCYL underwent a change of director. As a consequence, the former director was involved in writing the SER, and the new director had only started work at the agency the very week the panel arrived for the visit. This change did not have a negative impact on the review process and the panel had the chance to meet the new director at several subsequent meetings during the site visit.

3.3 Higher education in Castilla y León

The Autonomous Community of Castilla y León is the largest region in Spain and is divided into nine provinces. The region is located in the north-west of the country and has a population of 2.5 million inhabitants, which account for 5% of the national population. The higher education system in Castilla y León comprises nine universities, four of which are public and five private. They account for 11% of all HEIs in Spain and comprise a total of 18 campuses combining 101 centres. A total of 87.637 students were enrolled at the universities in the academic year 2013/2014, of which 12% were enrolled at the private universities.

Spain, in accordance with its 1978 Constitution, is organized in Autonomous Communities whose competences are pronounced in the Autonomy Statute. The model of education in Spain is decentralized, which means that responsibilities for education are distributed among the State, the Regional Autonomous Communities and the HEIs.

The Spanish higher education system is regulated by Organic Law 4/2007, amending Organic Law 6/2001, governing universities (LOMLOU). Said law sets out basic university regulation at a national scale, which establishes the various competences of the universities, regions, and national authorities. The LOMLOU sets out the functions concerning assessment as well as other tasks leading to certification and accreditation corresponding to

both the national agency and to the assessment bodies established by the regional authorities.

University education is structured in three cycles: Bachelor (240 ECTS), Master (between 60 and 120 ECTS) and Doctoral. This structure follows the Spanish educational system and has been implemented from 2010 according to the EHEA prescriptions.

3.4 Quality assurance in Higher Education in Castilla y León

In Spain, several quality assurance agencies operate at the national and regional level. Currently, the Spanish national agency, ANECA, and five regional agencies (ACSUCYL, AQU-Catalunya, ACSUG, DEVA and Unibasq) are full members of ENQA. The different agencies operating in Spain are part of the REACU network (Spanish Network of Quality Assurance Agencies). This network enables the exchange of information regarding the different common quality assurance processes in place and establishes the common criteria for carrying out the various assessment processes conducted by all the agencies. This has led to a certain standardisation being achieved vis-à-vis the rules and procedures in place for the assessment processes carried out by said agencies. The agencies operate under national and regional law.

The Quality Assurance Agency for the university system in Castilla y León (ACSUCYL) was set up in 2001 as a consortium involving the regional authorities in Castilla y León together with the four public universities in the region.

In 2003, ACSUCYL was recognized under law 3/2003 of 28 March by the governing universities in Castilla y León as the external assessment body of the region. Subsequently, in 2010, Law 3/2003 was amended by Law 12/2010. One of the aims of the law was to establish a legal and organizational framework for the newly created agency outside the institutions it assesses. ACSUCYL thus emerged as a public body governed by private law.

3.5 ACSUCYL's activities

The agency has the following mission (SER p. 78): *“To ensure continual improvement in the quality of higher education and to contribute information concerning the outcomes of its actions that proves useful to all stakeholders.”*

ACSUCYL operates according to the regional law that in detail specifies that the agency shall perform a large number of tasks (for a full description see SER, chapter 3.1). ACSUCYL conducts activities related to assessment, accreditation, and certification of quality in universities as well as research and higher education centres in Castilla y León. It also engages in activities aimed at fostering quality in higher education.

Assessment of degrees

Assessment of university degrees involves three assessment processes that all degrees have to undergo in order to be awarded and maintain official status:

- Verification of curricula (ex-ante assessment) modification of official degrees
- Follow-up on official degrees
- Accreditation of official degrees (ex-post assessment for renewal of accreditation)

Assessment of research

Assessment of research includes:

- Assessment of proposals for the creation of University Research Institutes
- Periodic assessment of University Research Institutes
- Ex-ante assessment of research projects
- Ex-post assessment of research projects
- Other assessment degrees:
 - Assessment of excellence research groups
 - Assessment for the recruitment of pre-doctoral research staff
 - Assessment of research outcomes

Assessment of teaching staff

The main assessment programmes in the area of teaching staff assessment are:

- Assessment of teaching activities (DOCENTIA programme)
- Assessment prior to the recruitment of teaching staff
 - Accreditation of teaching staff
 - Assessment of emeritus professors

Finally, the agency sees another of its tasks as engaging in more development-oriented activities which aim at fostering enhancement of quality at the universities (SER p. 23).

3.6 ACSUCYL's assessment of degrees

The accreditation of official university degrees is regulated by means of the Royal Decree 1393/2007, October 29th. The process is composed of three stages (for a full description see SER p. 43-53):

Verification of curricula (ex-ante assessment)/modification of official degrees

The first step is an ex-ante paper-based accreditation before implementing the proposed degree programme. During the implementation of official degrees, some aspects may require modification so as to improve the learning outcomes and results of the degree. Universities can propose that the degrees verified are modified and submit demands for modifications to the University Council, an affiliate body of the National Ministry of Education.

Follow-up

ACSUCYL conducts follow-up accreditation on all registered new programmes. The main objectives of the follow-up process are to check the degree is being implemented in accordance with the verified curriculum and to appraise the principal outcome of its introduction. This process does not include site visits.

Accreditation of official degrees (ex-post assessment for renewal of accreditation)

At least six years after the implementation of Bachelor's and Doctoral degrees and four years after the implementation of Master's degrees, all official degrees must undergo a process of accreditation. This process ensures that study plans are being carried out in accordance with the initial project description (and, if appropriate, adapted according to the required modifications). This process includes site visits.

3.7 ACSUCYL's organization

The agency is structured in the following bodies as set out under article 38 of Law 3/2003 governing universities in Castilla y León:

- Governing bodies:
 - Board of Directors
 - Director
- Assessment bodies
 - Teaching Staff Assessment Commission
 - Research Assessment commission

- Degree Assessment Commission
- Institutional Quality Assessment Commission
- Advisory Board
- Student Committee

The agency has one director, 8 senior consultants and one secretary.

The assessment bodies (the four commissions) have a key role in the agency as they are responsible for the design, operation, quality assurance and appeals procedures for their designated procedures. The assessment commissions consist of 8-10 external experts selected from outside Castilla y León.

The procedure for managing evaluators establishes that the members of the assessment committees are appointed by the Director of ACSUCYL.

4 Findings

4.1 ENQA criterion 1/ ESG 3.1/ Part 2: Use of external quality assurance processes

ESG 3.1. Use of external quality assurance procedures

Standard: The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance procedures described in Part 2 of the European Standards and Guidelines.

Compliance with each standard of Part 2 of the ESG is discussed separately in the following sections. A summary of findings as well as the panel conclusion on the overall compliance of Part 2 ESG is provided at the end of this section.

4.1.1 ESG 2.1: Use of internal quality assurance procedures

ESG 2.1. Use of internal quality assurance procedures

Standard: External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Evidence: ACSUCYL's activities are subject to national and regional regulation. The regulation is comprehensive (SER, chapter 3.1) and assigns to the agency the task of conducting a substantial number of EQA procedures related to EQA of teacher qualifications, degree accreditation and research. In the area of degree accreditation the agency conducts three types of procedures: ex-ante accreditation (called verification procedures), follow-up procedures and ex-post accreditation.

The panel looked closely at the connection between the IQA mechanisms at the HEI level (ESG part 1) and the way the EQA processes are organized. In all three types of degree accreditation procedures the agency has (SER p. 97-98) demonstrated correspondence between the accreditation criteria and following ESGs (part 1):

1. Policy and procedure for QA
2. Approval, control and periodic review of curricula and degrees
3. Student assessment

4. QA of teaching staff
5. Learning and support resources for students
6. Information systems
7. Public information

Further, during the visit it was confirmed by the representatives of some universities (vice-rectors and staff of HEI's quality departments) that they work in close cooperation with ACSUCYL thus ensuring coordination between IQA at universities and ACSUCYL's EQA tasks. However, the universities (particularly the vice-rectors and their QA staff), also expressed that the great number of procedures involved in the Spanish EQA system has generated a significant administrative and bureaucratic burden for them.

The agency does not conduct institutional or audit reviews. During the last review ACSUCYL were involved in the AUDIT programme (a voluntary programme for the development and accreditation of HEI's IQA systems; ENQA review 2009, p. 16) and universities could apply for funding from ACSUCYL to develop IQA systems. Both activities have now been discontinued.

In order to foster enhancement of quality, the agency also undertakes other types of voluntary initiatives. For example, ACSUCYL has developed a guide for IQA of internships in universities.

Analysis: The panel is confident that the external quality assurance system in Castilla y León takes into account the effectiveness of the IQA processes in the universities described in Part 1 of the ESGs.

However the panel also noted that ACSUCYL's procedures are subject to regulation and described in detail through national and regional legislation. The panel finds it is a general weakness of the current Spanish EQA system that the system is highly regulated and does not allow to consider the opportunity of alternatives (or a combination) of EQA options (programme, institutional, audit). This limits the agency's freedom to adapt systems and procedures and could create bureaucracy and costs, associated to the universities. In this context the panel discussed the fact that the introduction of audits or other sorts of institutional accreditation could, where appropriate, present an excellent opportunity to reduce bureaucracy and to strengthen the quality culture in the HE system, as well as to reduce costs of EQA and IQA procedures in HE. Even though the panel acknowledges that

the agency has limited freedom in order to address this situation, it has come out with some recommendations regarding this issue (see ESG 2.4).

The panel has also discussed that the HEI representatives (based on the interviews at the site visit) seem to rely to a large extent on ACSUCYL's procedures when it comes to development of their own IQA procedures. On the one hand, it is positive that the universities get support when developing their IQA processes. On the other hand, the universities should keep responsibility of their own IQA processes at all times, and avoid relying too heavily on ACSUCYL.

Conclusion: Fully compliant.

4.1.2 ESG 2.2: Development of external quality assurance procedures

ESG 2.2. Development of external quality assurance procedures

Standard: The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Evidence: As described in the SER, chapter 3.1, the national and regional governments define the types of ACSUCYL's EQA procedures and their overall aims and objectives.

ACSUCYL describes in the SER (p. 98) how the agency develops new procedures based on its Strategic Plan and how suggestions are gathered by input from HEIs, the advisory board and the Student Committee. This input is then drawn up in the Annual Action plan. Further, it is described that a procedure handbook is published for each assessment process containing all the information concerning the purpose of the process, objectives, stages, assessment criteria and assessment bodies involved. The responsible assessment commissions and the agency's technical staff develop the handbooks. It is also described in the SER that HEIs are involved before a new process is set in motion.

During the interviews it became clear that universities are informed of new procedures and that they might be involved in technical issues regarding their implementation. However, they seem not to be actively involved in the design and development of new EQA processes. Neither the rectors and pro-rectors, nor the IQA professionals in the universities seemed to

have an active role in this matter. On the other hand, stakeholders expressed they have a very good relationship with the agency. The panel also noted that the stakeholders tended to have an understanding of EQA mainly as a set of technical procedures and did not talk so much about the impact of EQA on academic and qualitative aspects of degree quality in universities. This might indicate that the agency, in its dialogues and procedures, is mainly focused on the technical aspects of its work and needs to involve its stakeholders more in discussions on how EQA can contribute more to degree quality and student learning.

New procedures are generally developed and discussed in the relevant commissions where university experts from outside the area of Castilla y León are involved.

Finally ACSUCYL together with the other regional agencies works in close conjunction with the national agency to define the common criteria to be applied by REACU (SER page 44). Furthermore, when setting out the procedures, the stipulations specified by the University Commission for Regulating and Follow-up of Accreditation (CURSA), in which all the stakeholders involved in higher education are represented, are also taken into account.

Analysis: ACSUCYL has developed its processes and procedures in accordance with the law and through systematic involvement of its relevant internal bodies. The procedures are well planned and published. However, the panel still finds that universities from Castilla y León could be more involved in the development of new processes and procedures in order to ensure a more active buy in and a stronger connection between the universities' IQA processes and ACSUCYL's EQA procedures.

Conclusion: Substantially compliant.

Recommendation:

- ACSUCYL should consider how universities in Castilla y León could be more actively involved in the design and development of new quality assurance processes.

4.1.3 ESG 2.3: Criteria for decisions

ESG 2.3. Criteria for decisions

Standard: Any formal decisions made as a result of an external quality assurance activity should be based on explicit, published criteria that are applied consistently.

Evidence: ACSUCYL has explicit criteria for their procedures which can be found on their website. According to the SER (page 99), the following mechanisms are used to ensure consistency of decisions:

- The assessment commissions' systematic use of assessment reports from the committees.
- Coordination through the assessment commissions who are responsible for the quality assurance of all the procedures they coordinate.
- Involvement of the agency's technical staff to ensure assessment criteria are correctly applied.
- Reference documents associated with the review processes.
- Training days/informative sessions for evaluators at the start of each assessment process.
- Use of outcome indicators.

Interviews with members of the commissions and committees confirmed that each commission has IQA mechanisms in place. For example, the panel found evidence that the staff participated actively when there was a discrepancy in the interpretation of the criteria. The panel did note that each commission works independently, and they do not necessarily use the same IQA mechanisms. In certain cases, these differences might be justified by the different nature of the task carried out by each commission; however, the panel got the impression that ACSUCYL could benefit from a systematic exchange among the different commissions regarding certain generic procedures (such as training and evaluation of experts).

Analysis: The expert panel finds that the evidence confirms the criteria to be publicly available, and that the agency has its own IQA mechanisms in place to ensure criteria are consistently applied.

Conclusion: Fully compliant.

4.1.4 ESG 2.4: Processes fit for purpose

ESG 2.4. Processes fit for purpose

Standard: All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Recommendation in the 2009 review: Processes fit for purpose (ESG2.4). “ACSUCYL should review its practice with regard to onsite visits and develop a clearer vision and criteria as to when site visits are conducted.”

Evidence: The main goals, objectives and procedures for EQA in Castilla y León are defined and detailed in the national and regional law. The assessment methods have the following characteristics:

- Degree assessments take place in accordance with the national law as an ex-ante (verification) accreditation, a separate follow-up review and through an ex-post accreditation procedure. For degree assessments site visits are only used for ex-post procedures. These procedures are carried out in clusters with all degrees from the same university faculty (center) being executed in a single procedure.
- Assessment of teacher qualifications, research and degrees are based on a self-evaluation report, an expert review process and publication of a report. Site visits are used when performing periodic evaluation of university research institutes and when evaluating teaching staff activities, DOCENTIA programme (SER page 83).
- Through the SER and during the visit it has been confirmed that the quality assurance of ACSUCYL’s operational processes are managed through commissions and carried out by the committees. The commissions have systems in place to ensure careful selection of experts with appropriate skills. Students participate as full and equal members of the panels in all three types of degree assessments but with specifically assigned tasks. There is organized training for experts.
- International experts are generally not involved in the reviews due to language issues, but they are involved in various bodies such as the Institutional Quality Assessment Commission and the Advisory Board.

The ex-post accreditation procedure has been recently implemented. In 2013 ACSUCYL was the first agency in Spain to start this process covering 21 degrees. ACSUCYL plans to start 161 degree accreditations in 2015 (see ESG 2.7).

According to the evidence gathered in the different interviews and based on analysis of the published reports, the agency seems to put a lot of emphasis on the efficiency of its procedures. The panel got the impression that recommendations are mostly focused on administrative procedures and the dissemination of public information, which are of course important, but only some aspects of EQA. During interviews with representatives of the regional ministry the general opinion was, that the bureaucracy should be decreased, and the more academic aspects of the agency's processes should be invigorated. The members of the Advisory Board and the Director expressed similar views.

Analysis: The panel finds that the agency works in a highly professional way with regard to its different assessment procedures whilst taking into account the great variety of administrative tasks it has to undertake in order to oblige the national and regional legislation. Further, based on the procedures above, the panel is confident that the review procedures currently used are sufficient to provide adequate evidence to support the findings and conclusions reached. However, the panel wishes to draw attention to two issues:

- There is no doubt the agency has a primary focus on efficiency when it designs and implements its administrative procedures. When it comes to EQA of degrees, the panel is concerned that this fact could lead to a limited focus on the academic, the qualitative and the enhancement oriented elements of the reviews.
- The plan in the future to conduct a significant number of ex-post degree accreditation procedures in a limited time period with minimal resources is a matter of concern. This configuration pose challenges in terms of the dynamics and organization of the visit and the size and profile of the expert team; it may make it difficult to attain the appropriate level of analysis needed in a programme accreditation scheme. In practice, such a compressed set up would suggest there is a need to shift to a more institutional approach. However, this is not consistent with the current Spanish legislation and thus, in this sense, could not be considered fit-for-purpose.

It is a good sign for further development of the agency's processes that the regional ministry, the advisory board and the director expressed their belief that the agency should work towards a more academic perspective with less administrative bureaucracy.

There is still a need to more actively involve international experts, even though the panel recognizes the language barrier and the economic situation of the agency as substantial obstacles to this international dimension.

Conclusion: Substantially compliant.

Recommendation:

- The agency should remain vigilant to ensure that ex-post degree programme accreditations are carried out in accordance with established European best practices regarding the time spent per programme, the size and profile of the expert team, etc, so as to ensure an appropriate level of analysis.
- The agency should be proactive in initiating a debate at the regional and national level in order to consider the global fitness for purpose of the Spanish EQA system as well as the opportunity of a shift to institutional or audit reviews.

4.1.5 ESG 2.5: Reporting

ESG 2.5. Reporting

Standard: Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Evidence: It is the assessment commissions that ensure the quality of the agency's reports. According to the SER the agency has worked on improving its reports and its recommendations (SER p. 105) and has achieved increasingly higher levels of user satisfaction with them. In this vein the agency has focused on not just giving a final score of its assessment but has also provided specific guidelines and proposals in its reports.

ACSUCYL has provided all institutions with a link, where all stakeholders can see the result of the reviews on an institution-specific homepage. Similarly, a search engine has been established in order to make it easier locating all review reports.

The expert panel read a selection of reports from the agency. The panel found that the verification (ex-ante) and follow-up reports are primarily focused on whether the programme

fulfils administrative and legal requirement and provides the required public information. The panel also went through a selection of reports out of the 21 ex-post accreditation procedures executed in 2013-2014, and found a lack of focus on qualitative elements, as well as on teaching and learning related aspects. The panel also noted that even though the cluster method is used for ex-post accreditation, there are no reports covering general tendencies related to each specific institution.

The agency produces meta-evaluation reports based on its review reports (see ESG 2.8.).

Analysis: The expert panel finds that the agency pays high attention to the usefulness and dissemination of its reports. The links provided to the specific institutions and the search engine with access to the reports are excellent ideas.

In the future, it will be important for ACSUCYL to ensure that the new ex-post accreditation procedures are carried out and the reports written in ways that enable inclusion of the necessary academic and qualitative evaluative judgments and recommendations, which will constitute a good and constructive learning outcome for HEIs.

Conclusion: Fully compliant

4.1.6 ESG 2.6: Follow-up procedures

ESG 2.6. Follow-up procedures

Standard: Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Evidence: A specific assessment procedure is dedicated to follow-up on new degrees and this process is described in the legislation. After this, an ex-post accreditation procedure takes place. The system with ex-ante (verification), follow-up and ex-post degree accreditation ensures follow-up for all programmes. The agency involves in the evaluation of the specific degrees some of the same experts who participated in the previous evaluation.

During the site visits, the students, the IQA staff at the universities and the staff of the agency confirmed the systematic nature of the follow-up procedure. This procedure has two main functions. The first is to check the proper implementation of the degree programme

according to the initial draft presented by the university and recognised in the verification phase; the second objective is to check up on the main results obtained up to that moment. The agency is especially focused on the analysis of publicly available information in order to conduct this follow-up.

Analysis: The panel finds that the annual follow-up implemented by ACSUCYL is sufficient to efficiently control the state of implementation of the degree programmes according to the initial ex-ante accreditation. The Spanish legislation does not currently include a compulsory regular follow-up procedure after the first ex-post accreditation procedure. Such a procedure should be developed at the Spanish level in order to be consistent with the ESG on the long term.

Conclusion: Fully compliant.

4.1.7 ESG 2.7: Periodic reviews

ESG 2.7. Periodic reviews

Standard: External quality assurances of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Evidence: ACSUCYL follows national and regional legislation, which states that bachelor and doctoral degrees have to go through ex-post accreditation within six years and master degrees within four years. In order to reach these goals ACSUCYL has planned the following number of procedures as illustrated in figure 1. Furthermore, the system of ex-ante-accreditation, follow-up and ex-post accreditation ensures constant follow-up on the IQA at the universities.

Figure 1: Planned ex-post degree accreditation procedures

Start of procedure (each year in September)	Number of programmes
2013	21
2014	66
2015	161
2016	156
2017	34
2018	67
2019	11
Total	516

Analysis: The planned accreditation procedures ensure periodic reviews take place as all degrees have to go through ex-ante, verification and ex-post degree accreditation. There is no doubt that the length of the cycle and the review procedures to be used are clearly defined and published in advance.

However, it should be mentioned that all these procedures place a considerable workload on the universities and on ACSUCYL as described under ESG 3.4.

Conclusion: Fully compliant.

4.1.8 ESG 2.8: System-wide analyses

ESG 2.8. System-wide analyses

Standard: Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Recommendation in the 2009 review: System-wide analysis (ESG 2.8): “ACSUCYL should introduce a process of formal meetings between the agency’s internal units and the presidents of the assessment commissions to ensure that an analysis and comparison

between the different units and commissions of ACSUCYL is made and that good practices are being shared, thus enabling a genuine system-wide analysis to be undertaken.”

Evidence: According to the law (SER p. 111) ACSUCYL shall publish:

- Reports on the state of the HEI system in Castilla y León
- Studies aimed at improvement of assessment and certification models
- Statistics and convey outcomes and proposals for improvement through specific publications to the society.

The agency regularly publishes (SER p. 111) the following studies:

- Reports on the main outcomes of the assessment process
- Analyses of the impact of the agency’s activities
- Meta-evaluation reports
- Annual activity reports
- Status reports to the board
- Reports on the state of the external assessment of quality in Spanish universities
- Reports on the outcomes of satisfaction surveys.

The agency does not have any specific research and development department. The staff and the relevant commissions undertake analyses and report writing.

As part of the follow-up process from 2009, the agency organized a meeting between the presidents of the different commissions concerning the need to share information internally in the agency. As a result, regular meetings are now held between the members of the assessment commissions and the evaluation committees.

The agency works collaboratively within the Spanish Network of University Quality Agencies (REACU), and they have published a number of evaluation projects, for example, the “Report on the quality of Spanish Universities”. This report is addressed to the Spanish Higher Education Minister and is meant to be a source of information for policy development.

Analysis: Some types of reports mentioned above are focused on the direct quality and status of progress of the agency’s work. This includes, for instance, annual activity reports, status reports to the board and satisfaction surveys and meta-evaluations. In the same vein, the follow-up on the 2009 report also related to internal sharing of information. The expert panel finds these activities to be fruitful and important to the agency.

The panel recognizes the value of ACSUCYL's studies. However, the panel notes that the agency does not sufficiently involve external stakeholders in more substantial and strategic oriented evaluations in order to evaluate the used EQA models in depth. For instance this could be done through focus groups and consultations with external stakeholders. Further, the panel finds that the agency, apart from providing a status of the results of its activities, could consider the usefulness of conducting a more holistic analysis (i.e. considering the Spanish EQA system and the place and input of the agency within this system).

Considering the economic situation and the need to analyse the Spanish HE system as a whole the panel finds that the national cooperation in the REACU network is a considerable strength.

Conclusion: Substantially compliant.

Recommendation:

- See the ESG 2.4 recommendation concerning the need to achieve a higher level of involvement of stakeholders in the development and the evaluation of the agency's methods and processes.
- The agency should consider involving stakeholders in a discussion about what sort of system-wide analysis is needed at the Castilla y León level and is feasible under the agency's current economic circumstances and whether more work in this area can be done on a national scale.

4.1.9 ENQA Criterion 1 / ESG 3.1/ESG part 2: Summary of findings

ACSUCYL's compliance with each of the ESG Part 2 Standards is discussed in sections 4.1.1-4.1.8 above. The panel found ACSUCYL to be fully compliant with ESG 2.1, 2.3, 2.5, 2.6 and 2.7, and substantially compliant with ESG 2.2, 2.4, and 2.8. The overall judgment of the panel regarding section 2 of the ESG is that ACSUCYL is substantially in compliance with the standards.

The panel found that the agency could engage external stakeholders more in the development of new processes (ESG 2.2) and in system wide analysis (ESG 2.8). Finally, the panel considers that there is a risk that the implementation of large scale cluster accreditation could compromise the quality of reviews. In practice, this compressed set up would suggest the actual shift to a more institutional approach, which is not consistent with

the current Spanish legislation and thus, in this sense, the agency's processes could not be considered fully fit-for-purpose (ESG 2.4). However, the panel notes that this last point is a result of the missions imposed by the national and regional legislation and the fact that limited resources are available to fulfil these missions and as such, it is a challenge that should be addressed at the level of the overall EQA system in Spain.

4.2 ENQA criterion 1 / ESG 3.3: Activities

ESG 3.3. Activities

Standard: Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Evidence: The agency undertakes quality assurance activities on a regular basis as described in ESG 2.7. Some of these activities are related to research and assessment of teacher qualifications. At the time of the visit the panel was told that 2½ to 3 full time positions were allocated to degree assessment, through verification, follow-up and ex-post accreditation.

Analysis: There is no doubt that the agency undertakes quality assurance on a regular basis and that this is a core function of the agency. However, the panel has discussed that limited resources and few staff involved in the core of EQA of education (verification, follow-up and ex-post accreditation) may present a challenge. See ESG 3.4.

Conclusion: Fully compliant.

4.3 ENQA criterion 2 / ESG 3.2: Official status

ESG 3.2. Official status

Standard: Agencies should be formally recognized by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Evidence: ACSUCYL is the external assessment body for HE in Castilla y León as set out under Article 32.2. of Law 3/2003, of 28 March governing universities in Castilla y León, amended by Law 12/2010, of 28 October. It is here defined that the agency has the following tasks (SER, chapter 3.1):

- *"The task of the Quality Assurance Agency for the University System in Castilla y León is to undertake assessment, accreditation, and certification of quality in the area of universities and higher education centres in Castilla y León" (art 35.1).*
- *"The Quality Assurance Agency for the University System in Castilla y León may also cooperate in assessment, accreditation, and certification in the area of universities and higher education centres outside of Castilla y León within the context of the European Higher Education Area" (art 35.2).*

Analysis: The panel finds that the agency has a clear legal and formalised status and that they comply with any requirements of the legislative jurisdictions within which it operates.

The panel has, however, discussed that it might be a challenge for the agency to fulfil all the tasks required by the law (see SER, chapter 3.1) given the limited resources. It might force the agency to focus more on the efficiency of its procedures rather than on the effectiveness. A higher degree of freedom could probably be given to the agency to develop more effective EQA systems and procedures in the long term. See considerations and recommendations to ESG 2.4.

Conclusion: Fully compliant

4.4 ENQA criterion 3 / ESG 3.4: Resources

ESG 3.4. Resources

Standard: Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective manner, with appropriate provision for the development of their processes and procedures and staff.

Recommendations in the 2009 review: Resources (ESG 3.4): “ACSUCYL should introduce measures to help staff members to further improve their knowledge of English and should consider the introduction of a post of Deputy Director (even if only to cover emergencies).”

Evidence: In 2014 ACSUCYL has a total budget of 1 mil. € financed by the Region of Castilla y León. The agency may also attain revenue from its activities, though currently there is no real substantial income from this source. To compare the budget was 2.35 mil. € in 2009 when the last review was written. The difference is mostly due to a substantial cut in public funding in 2012 as a result of the financial crises in Spain.

The following measures were implemented in 2012 to handle the reduction in funding (SER p. 30-31):

- Reduction in salaries and staff (three jobs were cut).
- Using more virtual meetings to reduce travel expenses.
- 20% reduction in amounts paid to evaluators.
- Cutting out certain assessments processes with no clear impact on the system.
- Reducing the number of experts in assessment of contracted lecturers and research projects.
- Further use of “electronic administration” systems (digitalisation).
- Moving to cheaper office facilities.

ACSUCYL describes in the SER (p. 31) that these initiatives have in no way impacted the quality and the professionalism of the agency’s work. During the interviews it was confirmed by the employees that they felt the reductions were done in a meaningful manner and they expressed that they felt motivated and as a strong team. It was further expressed by the heads of the commissions that evaluators have accepted the cuts in their salaries, as they

are motivated not so much from the income but by their contribution to quality assurance in higher education in Castilla y León.

During the interview with the Director and the regional government, a number of possible future initiatives for increasing the resources of the agencies were mentioned and, in particular, the possibility of providing EQA services to HEIs outside Spain (South-America).

The agency's budget cover a large range of EQA activities related to research, teacher qualification and degree assessment (verification, follow-up and accreditation). During the visit the panel was told that approximately 2½ to 3 full time staff were used to perform the three types of degree assessment and that this was possible as the specific evaluations were carried out by the Degree Assessment Commission and the expert panels.

The agency has in 2013-2014 started ex-post degree accreditation procedures. At the time of the visit, the panel received a report of the results of the first 21 ex-post accreditation procedures. ACSUCYL starts 66 ex-post accreditation procedures in September 2014, 161 procedures in 2015, 156 in 2016, 34 in 2017, 67 in 2018 and 11 in 2019. It became evident during the site visit that the agency is aware that this is a resource intensive process, which, since 2013, has included an on-site visit by the agency's experts at the degree level. The panel was told that the agency therefore planned to do cluster accreditations where all degrees at the same universities will be assessed simultaneously. According to the plan for 2015, it will follow that in some cases more than 40 degrees should be ex-post accredited simultaneously in the same cluster at the same university.

Concerning the recommendation in the 2009 review, the agency has held English courses for employees but the agency has decided, due to the current economic situation, not to employ a Deputy Director.

During the site visit the expert panel was impressed by the professionalism and the engagement of the staff, which without doubt is a strong resource for the agency. The panel also found the agency's office facilities to be well-functioning. It is also a strong point that one of the staff members is specialized in IT.

Analysis: The expert panel finds it is very impressive how the agency has dealt with the economic reductions apparently without damaging the core functions of the agency and the

motivation of its staff. The agency's recipe has largely been to be more efficient using and optimizing resources incredibly well.

However, the new implementation of ex-post procedures are, in the view of the panel, a resource intensive process, especially if site visits have to be included and qualitative assessments carried out. The panel finds it hard to see how the agency, given the current economic situation and already engaged resources, can add so much new extra activity without compromising the quality of its procedures (see ESG 2.4).

The agency currently only uses two to three full time staff for ex-ante, follow-up procedures and ex-post degree accreditation, while other staff do EQA of teaching staff and research. In this context it is difficult to see how 161 new ex-post accreditation procedures can be added to existing procedures in the agency, without any other procedures being phased out or extra funding for the activities obtained.

Even though the panel is aware that ACSUCYL has made considerable efforts to reduce its costs, there still is a limit to how much more productive and efficient ACSUCYL can become when managing accreditation procedures.

The panel acknowledges that ACSUCYL has limited capacity given the economic challenges faced; these challenges are in fact shared by all EQA agencies in Spain as they are caused by certain system features (a demanding legislation which establishes thorough compulsory EQA processes at the programme level, and scarce resources due to the economic crisis). However, ACSUCYL should proactively work on finding sustainable solutions so tasks and economic resources are coherent.

In conclusion, the panel finds that the agency at the moment of the assessment has demonstrated that they have carried out their tasks with great professionalism and commitment given the current economic circumstances. But the panel sees a risk that the agency cannot carry out the ex-post accreditation with the current economic resources with the appropriate level of depth and quality. This should be discussed at a system level. The plan to do accreditation procedures abroad might lead to increased income but it might also in the short term require considerable investment

Conclusion: Fully compliant.

Recommendations:

- ACSUCYL should carefully consider the coherence between the financial resources available and the fitness for purpose of the current ex-post programme accreditation scheme.
- See ESG 2.4 concerning the possibility to consider a shift to institutional or audit reviews at the EQA system level.

4.5 ENQA criterion 4 / ESG 3.5: Mission statement

ESG 3.5. Mission Statement

Standard: Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Recommendations in the 2009 review: Mission statement (ESG 3.5): “ACSUCYL should develop a single document labelled “Mission Statement” which combines all the important elements from the four separate documents in which the mission of ACSUCYL is currently defined and that this document be published on the Agency’s website.”

Evidence: Following up on the 2009 review the agency has formulated the following mission statement published on its website (SER p. 78):

- “Mission: To ensure continual improvement in the quality of higher education and to contribute information concerning the outcomes of its actions that proves useful to all stakeholders.”

This is according to ACSUCYL implemented through:

- A strategic plan
- Yearly action plan
- Yearly follow-up on the action plan
- A set of formulated values

Further the agency’s tasks are defined in detail in the legislation.

At the visit the panel discussed the agency’s mission a number of times with the agency and its stakeholders. The panel noted most interviewees were not very aware of the mission statement as such – although their views on what the mission of the agency should be were rather similar to the actual mission statement. During these discussions it also became

evident that whereas the mission is very focused on continual improvement the underlying strategic and action plans translates the mission narrowly into specific procedures. All these procedures are implemented in order to perform all tasks as defined by government.

Analysis: The panel finds that on a formal level the agency does have a mission statement and it does have processes aimed at translating it into action. However, the panel has discussed that the agency could probably be more proactive and more ambitious when it comes to the part of the mission related to “continual improvement in the quality of higher education”. The agency could proactively ask itself: are our methods the most effective to foster continual improvement, can we improve the way we engage our stakeholders etc.? These issues are already discussed regarding ESG 2.4, where related recommendations can also be found.

Conclusion: Fully compliant.

4.6 ENQA criterion 5 / ESG 3.6: Independence

ESG 3.6. Independence

Standard: Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Recommendation in the 2009 review: Independence (ESG 3.6): “ACSUCYL should consolidate the independence of the assessment commissions through a better balance between members from within and without the autonomous region of Castilla y León.”

Evidence: It is defined in law 3/2003 governing universities in Castilla y León, amended by law 12/2010 of 28 October, that the agency is a public body governed by private law endowed with its own legal capacity, full powers to act and its own assets enabling it to carry out its function. The law draws according to the SER (p. 79) a distinction between the agency’s organic structure and its assessment bodies and it establishes that the governing bodies have no powers in the assessment tasks and may not influence the agency’s assessment decisions.

Since the last review ACSUCYL has changed its use of experts in the commissions and in the committees so all experts now come from outside the area of Castilla y León. This

change has been made in order to ensure the agency's operational independence and it is related to the recommendation in the 2009 review described above.

All ACSUCYL's tasks are carried out through its assessment commissions and the interviews with the heads of the commissions are consistent with the SER (p. 79), stating that the commissions act with autonomy and independence. Further the agency ensures all experts sign a statement of confidentiality and no-conflict of interest.

Analysis: Given the presented evidence the panel is satisfied that the agency's structure and legal status ensure its independent status and its operations are carried out independently. However, the panel did realise that the fact that the commissions only consist of external experts coming from outside Castilla y León might be a weakness when it comes to ensuring stakeholder involvement from Castilla y León in the development of procedures as mentioned in regard to ESG 2.2 and 3.8.

Conclusion: Fully compliant.

4.7 ENQA Criterion 6 / ESG 3.7: External quality assurance criteria and processes used by the members

ESG 3.7. External quality assurance criteria and processes used by the agencies

Standard: The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Recommendation in the 2009 review (SER 2009 p. 31 and chapter 5.1.4): "ACSUCYL should have a clearer vision and criteria as to when site visits are conducted".

Evidence: The agency's overall criteria and concepts are already described in relation to ESG 2.3 Criteria for Decisions and ESG 2.4 Processes fit for Purpose. It is hereby already established that the agency's procedures and criteria are clear and that the assessments of degrees involve self-assessment, external assessment by a group of experts, publication of a report and follow-up procedures. Furthermore, it has been established that the Spanish EQA system in HE includes follow-up procedures through the verification procedure which has been discussed under ESG 2.6.

The panel is in no doubt that the agency undertakes this task very professionally and efficiently and that the agency's staff are proud of their work. It is clear throughout the SER and from the site visit that the agency is aware of the ESG and that many improvements in its processes have been made since the last review.

It has also been described under criterion 1 (related to ESG 2.4) and criterion 3 (ESG 3.4) that the panel finds some challenges. The agency might be too focused on efficiency which could have an impact on the quality of its procedures. It is further described (ESG, 2.4) that the future concept for cluster accreditation poses technical challenges, which should be carefully considered by the agency.

The nature of the appeals procedure is mentioned under ENQA criterion 8.

Analysis: In light of the procedures described, the panel is confident ACSUCYL's criteria and processes are professionally planned and executed. Concerning the future, the agency is advised to consider ways to ensure that the many tasks related to the substantial number of planned ex-post accreditation procedures do not threaten the agency's quality standards and allow for the implementation of ex-post-accreditation procedures with high standards.

Recommendations regarding this issue can be found under ESG 2.4 and 3.4.

Conclusion: Substantially compliant.

4.8 ENQA Criterion 7 / ESG 3.8: Accountability procedures

ESG 3.8. Accountability procedures

Standard: Agencies should have in place procedures for their own accountability.

Recommendations in the 2009 review: Accountability Procedures:

- “It may be appropriate to ask the ACSUCYL advisory board (while remembering that its title indicates the status of its conclusions) to take on a more substantial role in terms of proposals and advice on policy and procedures and their development.”
- “ACSUCYL should evaluate possibilities for the introduction of more external stakeholders to its different bodies (there is currently only one member of the board of directors who directly represents the external stakeholders, i.e. the business sector).”
- “In order to create a value for society, ACSUCYL should be more proactive in communication with a broader public than the national and regional authorities as well as the universities in the autonomous region.”
- “ACSUCYL should pay more attention to gender equity in the selection of the members of its assessment commissions.”

Evidence: ACSUCYL uses the following main measures to ensure its own accountability (SER p. 86-94):

- Internal quality policy published on its website
- Quality Handbook describing all procedures
- ISO 9001 certification of the agency’s procedures
- Code of Ethics
- Procedure for Managing Evaluators
- Information Systems Security Policy
- Use of dashboard with up-to-date information of its processes
- Reports and evaluations of the outcomes of assessment procedures
- Internal suggestions and queries mailbox (600 messages received last year)

As described under the ESG 3.5 (mission statement) the agency also has a strategic plan and yearly action plans to ensure follow-up. The agency describes (SER p. 92) internal and external feedback mechanisms involving the Advisory Board, The Student Committee, The Expert Commissions, the Expert Committees and the Quality Commission and meetings with external stakeholders. The HEI representatives and the meetings with experts in

commissions and committees confirmed that the agency's processes are professionally run. All members of the expert commissions and committees come from outside Castilla y León.

Concerning follow-up on the 2009 review: The agency describes how they have been more active in involving external stakeholders and informing them proactively; for instance through the use of external experts outside Castilla y León and through participation in projects. The number of IQA activities and systems the agency has implemented confirms this.

Furthermore, the agency has increased the number of women in its reviews from 18% to 32% according to the agency's follow-up report from 2012.

During the site visit the expert panel met the different internal and external stakeholders and asked them about their roles and internal and external feedback mechanisms. Internal and external stakeholders commented positively concerning the professionalism of the agency and its work.

ACSUCYL has recently conducted a student survey in order to get feedback from students participating in the different reviews. The students also have their own student committee. During the visit it became clear that the students in the committee did not know about this evaluation and its results, they did not have any contact to the students in the expert committees and they did not have knowledge of ACSUCYL's strategy.

The Advisory Board explained their advisory role to the panel and during the interview they showed a high understanding and awareness of the strategic issues the agency is facing.

Concerning feedback from the HEIs, the panel noted a close contact and strong cooperation with IQA professionals at the universities. However, the feedback from the HEIs seemed to relate mostly to technical and operational matters. The panel could not find specific examples or evidence that rectors and vice-rectors from the universities were actively involved in strategic directions of the agency and in overall discussions of the future of the agency. The new director expressed that he sees a need to involve the universities more on an academic and strategic level, and that he plans to arrange meetings with all universities on a regular basis.

Analysis: The agency has increased and improved its accountability procedures since the last review implementing new procedures strengthening internal and external feedback mechanisms.

The agency can still improve the way it collaborates with external and internal stakeholders. The panel agrees that the director's plan to engage universities more actively through regular meetings is a good idea. Furthermore, the panel believes the agency will benefit from working more proactively and strategically with the universities. It can facilitate a change of perspective so EQA focuses more on improvement of teaching and learning experiences, rather than on technical procedures and processes. This is also consistent with the views expressed by the advisory board.

The agency should also consider to extend this collaboration to other kind of stakeholders, and specifically, to representatives of the socio-economic world. This would enable to integrate labour market perspectives into the agency's internal reflections.

The panel welcomes the initiative of creating a Student Committee. However, as this is a very recent development, there is still room for improvement. The Student Committee may benefit from further discussions of their role, the mission of the agency and the development of links between the Student Committee and the students partaking in the expert committees.

The decision to only engage experts from outside Castilla y León is an understandable choice in order to ensure the independence of the agency. It is, however, also a weakness when it comes to stakeholder involvement. The result is that external stakeholders and not the regional university community is involved in the EQA processes that are developed in the commissions. Hence the spill-over of knowledge and experiences primarily takes place outside Castilla y León. ACSUCYL should engage its external stakeholders from Castilla y León actively in the more strategic and academic discussions on EQA and in the design of its EQA processes as described under ESG 2.4.

Conclusion: Fully compliant.

Recommendation:

- See ESG 2.2 concerning the need for engaging external stakeholders from Castilla y León more actively in the strategic and academic discussions on EQA and in the design of its EQA processes.
- ACSUCYL should pursue its efforts to strengthen student involvement. Specifically, the specific role of the newly created Student Committee should be clarified, as well as their actual capacity to provide useful feedback for the agency.

4.9 ENQA criterion 8: Consistency of judgments, appeals system and contributions to aims of ENQA

ENQA Criterion 8: Miscellaneous

I. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in consistent manner, even if the judgments are formed by different groups;

II. If the agency makes formal quality assurance decisions, or conclusions, which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

III. The agency is willing to contribute actively to the aims of ENQA.

Evidence and analysis: It has already been described as part of the accountability procedures that the agency has a number of IQA systems in place. The commissions are in charge of ensuring consistency and the site visit confirmed this task is undertaken seriously and professionally. On this basis the panel is confident that the agency works professionally and ensures consistency of its judgments.

The agency has an appeals procedure. The commissions who are responsible for all review reports manage the procedure. During the visit it became clear that the commissions handle the appeals by getting second opinions from new experts. The panel remarks that the appeals should be handled more independently by having an appeals procedure that is not handled by the commissions themselves, since they were responsible for the report in the first place.

The agency has been active in international relations. For instance the agency has been a member of the IQA group and the agency hosted ENQA's IQA conference in 2012. It was expressed by the director during the visit that the agency wants to prioritize international relations and work in the future.

Conclusion: Substantially compliant.

Recommendation

- The agency should consider revising its appeals procedure so a separate committee handles this process and not the commission that is responsible for running the review processes.

5 Conclusion and development

The expert panels overall assessment is that ACSUCYL is a very professional and well-functioning quality assurance agency. ACSUCYL plays an important role in improving quality and quality assurance in higher education in Castilla y León and they have demonstrated that they are well aware of and overall follow the ESGs.

Figure 2: Overview of review results

ENQA Criterion	Conclusion
ENQA criterion 1: Fully compliant ESG 2: ESG 2.1: Use of internal QA procedures ESG 2.3: Criteria for decisions ESG 2.5: Reporting ESG 2.6: Follow-up ESG 2.7: Periodic Reviews ESG 3.3: Activities Substantially compliant ESG 2: ESG 2.2: Development of EQA processes ESG 2.4: Processes fit for purpose ESG 2.8: System wide analysis As a result ESG 3.1 is substantially compliant. ESG 3.3: Activities: Fully compliant	Substantially compliant
ENQA criterion 2: ESG 3.2: Official status	Fully compliant
ENQA criterion 3: ESG 3.4: Resources	Fully compliant
ENQA criterion 4: ESG 3.5: Mission statement	Fully compliant
ENQA criterion 5: ESG 3.6: Independence	Fully compliant
ENQA criterion 6: ESG 3.7: EQA criteria and processes used by the members	Substantially compliant
ENQA criterion 7: ESG 3.8: Accountability	Fully compliant
ENQA criterion 8: Consistency of judgements, appeals system and contributions to aims of ENQA	Substantially compliant

The agency has good support from its stakeholders, and its employees are motivated and provide outstanding administrative support and service to the HEIs. As a result ACSUCYL has enhanced quality assurance and improved public information about quality at HEIs. Overall, ACSUCYL has also followed the recommendations of the last ENQA review. The agency's results are impressive when it is taken into account that the agency's activities are regulated through demanding and detailed requirements from the local government in a period where the budget has been cut considerably. The overall assessment of the agency in accordance with the ESGs shown in figure 2 has to be seen in this positive light.

The panel has the following concerns that describe the reasoning behind the decision to evaluate some of the ESGs as substantially compliant:

- The agency might be more proactive when it comes to the involvement of its external stakeholders. On one hand the agency's stakeholders give very positive feedback saying the agency is very service oriented and professional. On the other hand the external stakeholders end employers (including rectors and vice-rectors) could be more actively involved in the development of new procedures (ESG 2.2) and have a more direct role in system wide analysis (ESG 2.8). They should take part in developing a strategic reflection regarding strengthening the connection between EQA and IQA systems in the universities, so as to ensure real improvements in teaching and learning.
- The panel finds that ACSUCYL is impressively efficient in its procedures, but that this on the other hand is also a weakness of the agency, as too much efficiency might limit the ability to include the more academic and qualitative elements in the assessment. One important example is the plan for the introduction of large scale ex-post cluster accreditation procedures that is under implementation at the moment. The panel does find there is a real risk these procedures will not be fit for purpose (ESG 2.4) simply because the implementation of these procedures will be too condensed to incorporate valuable qualitative evaluation in the assessment of each degree. This is also why the panel considers that the agency is not in full compliance with ESG 3.7 concerning EQA criteria and processes used by the members.
- The need for efficient procedures is strongly related to the Spanish HE system in which the agency operates. The restrictive national and regional legislation, which the agency has to follow in detail, leaves little freedom for the agency to choose its tasks and design its processes. At the same time the available financial resources are limited with more

than 50% reduction in the budget since the last review. At the same time the tasks are not reduced. Quite the opposite trend is emerging, as the new ex-post accreditation procedures are now being introduced. Therefore there is a risk the agency in the future will not be fully compliant to ESG 3.4 concerning resources. Therefore the agency should work on influencing regional and national legislation in order to make sure tasks and resources are aligned. In this regard it should be considered if institutional accreditation/audits could be introduced in the EQA system. Such a change can reduce the number of administrative procedures and might give the universities more responsibility for their own quality assurance processes.

- Regarding criterion 8 the panel recommends the agency to review its appeals procedure so a separate committee handles this process and not as today the commission that is responsible for running the review processes.

The full recommendations of the panel can be seen in figure 3.

In conclusion the panel finds ACSUCYL to be a well-functioning and professional agency that works in accordance with the ESGs; even though there are still areas for improvement. The panel recommends to the Board of ENQA that Full Membership of ENQA is confirmed for a further period of five years.

Figure 3: Overview of panel recommendations:

- **ESG 2.2:** ACSUCYL should consider how universities in Castilla y León could be more actively involved in the design and development of new quality assurance processes.
- **ESG 2.4:** The agency should remain vigilant to ensure that ex-post degree programme accreditations are carried out in accordance with established European best practices regarding the time spent per programme, the size and profile of the expert team, etc, so as to ensure an appropriate level of analysis.
- **ESG 2.4:** The agency should be proactive in initiating a debate at the regional and national level in order to consider the global fitness for purpose of the Spanish EQA system as well as the opportunity of a shift to institutional or audit reviews.
- **ESG 2.8:** The agency should consider involving stakeholders in a discussion about what sort of system-wide analysis is needed at the Castilla y León level and is feasible under the agency's current economic circumstances and whether more work in this area can be done on a national scale.
- **ESG 3.4:** ACSUCYL should carefully consider the coherence between the financial resources available and the fitness for purpose of the current ex-post programme accreditation scheme.
- **ESG 3.8:** ACSUCYL should pursue its efforts to strengthen student involvement. Specifically, the specific role of the newly created Student Committee should be clarified, as well as their actual capacity to provide useful feedback for the agency.
- **Criterion 8:** The agency should consider revising its appeals procedure so a separate committee handles this process and not the commission that is responsible for running the review processes.

6 Annex – Site visit agenda

24th September - Arrival day		
16.00 – 20.00	Private meeting of the review panel	Review panel meeting at Hotel Juan de Austria.
21.00	Dinner	Review panel dinner:

25th September		
8.00	Panel arrival	Review panel arrival at Centro de Formación del Profesorado en Idiomas. Address: C/ Albéniz nº 1
8.15 – 8.55	Meeting with the Director and Head of IQA	- Salvador Rus: Director of ACSUCYL - Sandra Marcos. Head of IQA and International affairs at ACSUCYL
9.00 – 9.30	Meeting with the group preparing the self-evaluation report	- Mercedes Jaime. Expert on International Quality Assurance - Marinela García. Expert on International Quality Assurance - Sandra Marcos. Head of IQA and International affairs at ACSUCYL
9.45 – 10.45	Meeting with staff	- Amaya Urbaneja. Responsible for Teaching Staff Assessment - Carlos Guerra. Responsible for Assessment of Research

		<ul style="list-style-type: none"> - Sonia Martín. Responsible for Assessment of Degrees - Sandra Marcos. Responsible for Institutional Quality - Susana Cacho. Responsible for Economic Management -Jaime Díez. Responsible for Information Systems - Begoña Salas. Administrative Assistant
11.00 – 12.00	Meeting with members of the assessment commissions	<ul style="list-style-type: none"> - Pedro Chacón. President of the Degree Assessment Commission. - Mercedes Jaime. President of the Quality Assessment Commission. - Miguel Valcárcel. President of the Research Assessment Commission. - Clara Conde. President of the Teaching Staff Assessment Commission.
12.15 – 13.15	Meeting with experts in assessment procedures	<ul style="list-style-type: none"> - Carmen Moreno. Expert in research assessment procedures. - Amparo Moreno. Expert in teaching staff assessment procedures. - Federico Navarro. Expert in degree assessment procedures. - M^a Jesús Castel. Expert in degree assessment procedures. (Secretary) - José Miguel García. Expert in degree assessment

		<p>procedures. (Professional profile)</p> <ul style="list-style-type: none"> - Alma Gómez. Expert in degree assessment procedures. - Manuel Galán. Expert in quality assessment procedures.
13.15 – 14.15	Review panel lunch	Review panel only
14.15 – 15.15	Meeting with quality assurance staff in HEIs	<ul style="list-style-type: none"> - Mercedes Lecue. Director of Quality Assurance at the University of Valladolid. - Carolina Pérez. Director of Quality Assurance at the University of León. - M^a Consuelo Sáiz. Director of Quality Assurance at the University of Burgos. - M^a Dolores Olivera. Director of Quality Assurance at the Miguel de Cervantes European University. - M^a Paz Muñoz Prieto. Director of Quality Assurance at the Catholic University of Ávila.
15.30 - 16.30	Meeting with the members of the board of directors	<ul style="list-style-type: none"> - Salvador Rus: Director of ACSUCYL <p><u>Rectors:</u></p> <ul style="list-style-type: none"> - Daniel Hernández. Rector of the University of Salamanca - Alfonso Murillo. Rector of the University of Burgos <p><u>Stakeholders:</u></p> <ul style="list-style-type: none"> - Luis Gerardo Gutiérrez.

		<p>President of the Social Council. University of Valladolid.</p> <p>- Pedro Valerio Fernández. Secretary of the Social Council. University of Valladolid.</p> <p><i>Administration:</i></p> <p>- Fernando Vallelado. General Treasurer at the Regional Treasurer Ministry</p>
16.45 – 17.45	Meeting with vice-rectors of HEIs	<p>- Carmen Fernández Juncal. Vice-chancellor of Teaching at the University of Salamanca.</p> <p>- José Ángel Domínguez. Vice-chancellor of Promoting and Coordination at the University of Salamanca.</p> <p>- Alfredo Bol. Vice-chancellor of Teaching Staff and Administrative and Service Staff at the University of Burgos.</p> <p>- Matilde Sierra Vega. Vice-chancellor of Academic at the University of León.</p> <p>- Juan Vicente García Manjón. Vice-chancellor of Innovation and Strategic at the Miguel de Cervantes European University.</p>
17.45 -19.00	Review panel meeting	Review panel only
19.00 – 19.30	Tour of agency offices	ACSUCYL 's Staff

19.30 –21.00	Break	Review panel only
21.00	Review panel dinner	Review panel dinner

26th September		
8.15	Panel arrival	Review panel arrival at Centro de Formación del Profesorado en Idiomas. Address: C/ Albéniz nº 1.
8.30 – 9.30	Meeting with members of Regional Ministry, Parliament	- Juan José Mateos. Regional Minister for Education in Castilla y León. - Ángel de los Ríos. General Director for Universities and Research in Castilla y León.
9.45 – 10.45	Meeting with Advisory Board	- Miguel Ángel Quintanilla. President of the Advisory Board. -Fiona Crozier. Member of the Advisory Board. -Rafael Pedrosa. Member of the Advisory Board.
11.00 – 12.00	Meeting with students	- Juan Cordero. Student involved in the evaluation of degrees. - María Valle. Student involved in the evaluation of follow up of degrees. - Gonzalo Losa. Student involved in the evaluation of follow up of degrees. - Guillermo Jáñez. Member of the ACSUCYL´s Students

		Committee (University of León) - Alberto Riol. Member of the ACSUCYL 's Students Committee (Pontifical University of Salamanca)
12.00 – 12.30	Review panel discussions	Review panel only
12.30 – 13.00	Meeting with director and head of IQA	- Salvador Rus. Director of ACSUCYL. - Sandra Marcos. Head of IQA and International Affairs.
13.00 – 14.30	Review panel lunch and final discussions	Review panel only
14.30 – 15.00	Final meeting	- Salvador Rus. Director de ACSUCYL. - Sandra Marcos. Head of IQA and International Affairs. - Amaya Urbaneja. Responsible for Teaching Staff Assessment - Carlos Guerra. Responsible for Assessment of Research - Sonia Martín. Responsible for Assessment of Degrees - Susana Cacho. Responsible for Economic Management - Jaime Díez. Responsible for Information Systems
15.15	Departure	