



FOLLOW-UP REPORT

ANKARA, TURKEY
May, 2022

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Abbreviations

APQN	Asia-Pacific Quality Network
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EUA	European University Association
FuR	Follow-up Report
HEI	Higher Education Institution
IAP	Institutional Accreditation Program
IAR	Institutional Accreditation Report
IEEP	Institutional External Evaluation Program
IFR	Institutional Feedback Report
INQAAHE	The International Network for Quality Assurance Agencies in Higher Education
ISER	Institutional Self-Evaluation Report
QAMIS	Quality Assurance Management Information System
SAR	Self-Assessment Report
THEQC	Turkish Higher Education Quality Council

1. INTRODUCTION

THEQC was founded in 2015 with the name "Turkish Higher Education Quality Board" based on the "Higher Education Quality Assurance Regulation" and was reorganized and renamed as the THEQC by law¹ in 2017. THEQC has gained administrative and financial independence and became the only national authority in charge of QA in the Turkish higher education system. THEQC's primary responsibilities are to perform the external evaluation of HEIs, coordinate the authorization and recognition processes of accreditation agencies², and ensure the internalization and dissemination of QA culture in HEIs. THEQC's mission is to strengthen QA system in higher education to contribute to the continuous development of higher education institutions (HEIs) in Türkiye and, thus, the achievement of universal qualifications by individuals. THEQC's vision is to be an effective and internationally recognized institution in the higher education quality assurance field.

THEQC set as one of its main goals to become a member of the ENQA and thus improve its international recognition. To realize this goal, THEQC applied for ENQA membership, and between 9-12 December 2019, ENQA coordinated a site visit of a peer review panel to evaluate the compliance of the THEQC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The ENQA agency review had a significant impact on the enhancement of THEQC procedures and innovative steps that the agency took over, including the improvements on Institutional Accreditation Program (IAP) which has just launched at the time of the review.

The Turkish Higher Education Quality Council (THEQC) has prepared this follow-up report regarding the ENQA Agency Review that took place in 2019 and the ENQA Board decision letter dated 28 April 2020, which granted the ENQA membership to THEQC.

The primary purpose of this follow-report is to explain the improvements made against the standards of the ESG that were subject to the ENQA Agency Review Report³.

The external evaluation report decision (as issued following the ENQA panel visit in December 2019), and the ESG compliance (Parts 2 and 3) in line with the recommendations of panel and the ENQA Board are presented in Table 1:

¹ [Law No. 2547 on Higher Education, Additional Article 35 \(18/6/2017-7033/18 art.\)](#).

² In Turkey, the THEQC is sole responsible authority for the authorization and recognition of accreditation agencies by law. The processes of authorizing national accreditation agencies and recognizing international accreditation agencies are conducted in accordance with the principles and criteria set out by the THEQC. However, authorization and recognition is not mandatory to operate in Türkiye, authorization and recognition results in representation of the agencies in Higher Education Programs and Quotas Guide of HEIs Entrance Exam (YKS).

³ [ENQA Agency Review Report, 2020](#).

Table 1 ESG compliance feedback of ENQA review panel

Standard	ENQA Review Panel conclusion
2.1	Substantial compliance
2.2	Substantial compliance
2.3	Substantial compliance
2.4	Substantial compliance
2.5	Substantial compliance
2.6	Partial compliance
2.7	Partial compliance
3.1	Substantial compliance
3.2	Full compliance
3.3	Partial compliance
3.4	Full compliance (partial compliance by Board decision)
3.5	Partial compliance
3.6	Substantial compliance (partial compliance by Board decision)
3.7	(not expected)

Following sections of this report are the THEQC's responses to the recommendations for the partially or substantially compliant ESG standards and other improvements on THEQC's external QA activity, namely Institutional Accreditation Program.

2. ENQA'S RECOMMENDATIONS TO THEQC

2.1. ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 Activities, Policy, and Processes for Quality Assurance [substantial compliance]

Panel recommendation – 1: In the development of future strategic documents, the agency should make the participation of students more visible. It should ensure that the student member of the Council is involved in the agency's work to the same extent as other members.

THEQC's responses:

- THEQC established a Students Commission in 2019 to raise awareness of higher education students about the quality assurance system and increase their involvement in this respect. The Students Commission aims the establishment of students' quality societies in all HEIs. Activities for students are carried out in all HEIs in line with this goal and with the contributions of student members of Quality Commissions in institutions. The number of the students' quality societies in institutions increased to 53 as of March 2022, thanks to the work done and the established awareness level.
- "Turkish Higher Education Quality Council Students Commission Directive" was published and entered into force on 13 July 2020 and was updated on 30 March 2022 to make the Commission's works systematic in line with the panel's recommendations.⁴ The Directive explains the organization and working principles and the duties and responsibilities of the Commission, the duties and responsibilities of the Commission Chair, and the concepts such as quality ambassador training.⁵ Similarly, the principles and procedures related to the selection of the Council's student member are determined. According to these principles and procedures, the new member assignment process starts with an open announcement to candidates, and THEQC Students Commission makes a pre-assessment regarding the applications.⁶ Three candidates determined by the Commission are presented to the Council and the Council decides one of them as Council member.
- The student member of the Council becomes the Commission Chair automatically. Students Commission comprises a minimum of five and a maximum of 11 members, including the Commission Chair. Commission members are selected considering educational level, sex, study field, and regional diversity.⁷ An academic coordinator is commissioned by THEQC Presidency to guide the Commission in academic processes (training content, workshop content, etc.). This coordinator is not involved in decision processes and only gives support while scientific content of training activities is created, when needed. Students Commission consists of

⁴ [THEQC Students Commission Directive](#)

⁵ [Principles and Procedures Regarding the Determination of Student Members to the Higher Education Quality Council](#)

⁶ [Turkish Higher Education Quality Council Student Member Application Call](#)

⁷ [THEQC Student Involvement](#)

five sub-units.⁸ These units are benefitted to facilitate activities and processes. It is aimed that Commission members use their knowledge, energy, and time better through these units.

- The Commission convenes at least once a month and takes decisions by voting. Afterwards, the decisions taken are submitted to the Council by the Commission Chair, who is a Council member at the same time. For example, the Commission took decision to organize "Quality Ambassadors Training Program" and "Quality Ambassador Workshop," submitted it to the Council, and then the activities were carried out. The Council supports the Commission with such issues as private licensed online communication platform [Zoom], material design, content development, etc. After the training and workshop are completed, the Commission determines the student evaluators and submit them to the Commission on Institutional External Evaluation and Accreditation. Student evaluators have taken part in all evaluation teams since 2019. There are 286 candidate student evaluators in student pool as of March 2022.
- Students Commission Chair, a member of the Council, may be a member of the Commissions in which other Council members also take part. Currently, the Chair is assigned as the member of the Commission on Institutional External Evaluation and Accreditation and the Commission on International Relations. Similarly, other student members of the Commission may be assigned in THEQC Commissions. Accordingly, there are Students Commission members who take charge in THEQC's Commission on Institutional External Evaluation and Accreditation, Commission on Publicity and Stakeholder Relations, and Commission on International Relations. Thus, a direct connection is established between the Council's works and the works of Students Commission's related unit. For example, the students proposed to be included in evaluation process are determined by the Students Commission and submitted to the Commission on Institutional External Evaluation and Accreditation by the student members of this commission. Student Commission member in THEQC Commission on International Relations exchanged opinions with other members of THEQC Commission on International Relations about inviting students to Quality Ambassador Training.
- Moreover, a system that is planned to facilitate the communication of the Commission with student members in the Quality Commissions of HEIs. Student Quality Communities Unit of the Commission interacts both with student members in the Quality Commissions of HEIs and the members of students' quality societies in HEIs.
- Some of the activities of THEQC Students Commission are:
 - [Assignment of New Student Member of the Council](#)- January 5-February 3, 2021
 - [Quality Ambassador Training Program](#)- February 5-20, 2021
 - [Quality Ambassador Workshop](#)- 24 March, 2021
 - [Information for Student Members of Quality Commissions in HEIs](#)- 24 May, 2021
 - [New Memberships to ESU QA Student Expert Pool](#)- 1 July, 2021
 - [Meetings with Students' Quality Communities](#)- May 22-June 30, 2021
 - [Meeting of Students in THEQC Evaluation Teams](#)- October 7-8, 2021
 - [Commission Member Assignment](#)- September 27-November 1, 2021
 - [Students' Quality Societies Workshop](#)- October 27-28, 2021

⁸ [THEQC Students Commission](#)

- ["What Does Students' Quality Society Do? What Should It Do?"](#) Student Workshops- November 12-December 17, 2021
- ["Quality Assurance System and Student Involvement in Higher Education"- Student Seminars](#)- March 15-December 30, 2021
- Thematic analysis of Commission activities is present in 2020 Status Report for Student Involvement in the Quality Assurance System in Higher Education.⁹ Activities planned by Students Commission to be carried out in 2022 are present in the Commission's 2022 Activity Plan and listed below:
 - To reach all HEIs through student seminars,
 - To carry out Quality Ambassador Training-QAP'22 in 4 sessions and to add new student evaluators to THEQC evaluators pool,
 - To conduct Quality Ambassador Workshop-QAW'22 and to prepare students for THEQC evaluator training,
 - To hold informatory meeting on "Importance of student involvement and the activities that can be carried out" with quality commissions members in the institutions,
 - To organize Summit on Students in Quality,
 - To answer demands for "What Does Students' Quality Society Do? What Should It Do?" student works,
 - To conduct workshops to strengthen the quality of student evaluators,
 - To maintain relationships with ESU,
 - To develop and present a Student Guide that will answer students' questions in quality assurance processes,
 - To plan a project with British Council Türkiye, with student participation,
 - To carry out seminars and interactive works with student evaluators of national accreditation agencies.

Panel recommendation – 2: The panel recommends including further information in the Strategic Plan such as: plan of publications (including thematic analyses) and the staff development plan.

THEQC's response:

- In Türkiye, public administrations are obliged to develop a strategic plan in accordance with the Public Financial Management and Control Law No. 5018. The strategic plans developed with this obligation by public administrations are produced for 5-year periods based on the Regulation on the Procedures and Principles Regarding Strategic Planning in Public Administrations, which was published in the Official Gazette dated 26/05/2006 and numbered 26179 and later updated by being published in the Official Gazette dated 26/02/2018 and numbered 30344. THEQC's current Strategic Plan covers the years 2019-2023 and is still in force. Public institutions may update their Strategic Plans only by obtaining permission beforehand and with limited changes in the period the plans are in force. For this reason, THEQC Strategic Plan will be renewed in 2024.
- The staff development plan, which was mentioned in the panel recommendation, is defined with the goal "To meet human resources needs of the THEQC by taking into account all its service areas and improve its human resources' competencies"

⁹ [Status Report on Student Involvement in the Quality Assurance System in Higher Education for 2020](#)

[Strategic Plan, Objective 4.2.] in the THEQC's current Strategic Plan¹⁰. Further details are given under ESG 3.5 panel recommendation-2.

- In the scope of THEQC's 2022 plans, in-service training works will be modelled. With this goal, a Staff Development Group will be created. Competency-based and duty-specific planning for in-service training will be conducted with reference to "ENQA Quality Assurance Professional Competencies Framework"¹¹ and in line with the new strategic plan works. Moreover, it will be added to the 2024-2028 strategic plan works to be developed in 2023.
- Another recommendation from the panel is about including publication and thematic analyses in the strategic plan. The current Strategic Plan includes this point in the goal "To conduct regular institutional and social information activities on quality assurance in higher education and make publications that will constitute references" [Strategic Plan, Objective 3.2.]¹⁰. THEQC's publications are monitored according to the five performance indicators present in the said goal.
- The Higher Education Evaluation and Quality Assurance Status Report (referred to as "the Status Report" from this point on) written by THEQC annually is a legislative obligation of THEQC. The Status Report is included in sub-clause (ğ) of clause 1 of article 6 in the Regulation on Higher Education Quality Assurance and the Higher Education Quality Council as "To annually write and publish the Higher Education Quality Assurance Status Report that comprises recommendations for quality improvement in national higher education by evaluating the evaluation processes and internal quality assurance works of HEIs, and authorization of accreditation agencies, and to submit it for the relevant stakeholders' information, including the Council of Higher Education."¹² In addition, performance criteria for thematic analyses are addressed in Objective 3.2 of the current (2019-2023) Strategic Plan. In the scope of this goal, thematic analyses are expressed as reports for the society and HEIs. Thematic analysis planning will be made more visible in the scope of the works to develop the 2024-2028 Strategic Plan to be written in 2023.
- The publication activities of THEQC are carried out in compliance with the content of other goals and objectives in the Strategic Plan, too. Some examples from the publications regarding these objectives are presented in the table below [Table 2]:

Table 2 Strategic Plan objectives and the relevant publications

Objective	Publications
<i>Objective 1.2. To design innovative and diversity-oriented internal and external QAS to support policies in the higher education system.</i>	<p>Uludağ, G., Bardakcı, S., Yıldız, Ö. F., Tunç, Y., Akkoyunlu, Nasır, A., B. Ercan, S., and Elmas, M [2020]. Assessing Students' Learning Online: It's More Than Testing. Proceedings of the 12th Higher Education International Conference On Teaching And Learning Quality Assurance In Higher Education Under The Pandemic.</p> <p>Akkoyunlu, B., Aksu Yıldırım, S., Bardakcı, S. Avşaroğlu, M. D., Uludağ, G., Gündüz, A. Y. Koçer, A. and Elmas, M. [2020]. How Do Turkish Universities' Undergraduate Programs Build Generation Z Competencies? INQAAHE Forum, 2020.</p>

¹⁰ [THEQC Strategic Plan \(2019-2023\)](#)

¹¹ [ENQA Quality Assurance Professional Qualifications Framework](#)

¹² [Turkish Higher Education Quality Council Regulation](#)

<p><i>Objective 2.1. To provide educational services and activities to improve the quality assurance systems of higher education institutions.</i></p>	<p>Avşaroğlu, M. D., Sarıaydın, E., Bardakcı, S., Akkoyunlu, B. Ercan, S., Nasır, A., Aksu Yıldırım, S., Elmas, M. [2021]. THEQC's International Evaluator Training Program in the Midst of Pandemic. The 13th Higher Education International Conference On Education Innovation And Teaching Quality Assurance In The Post-pandemic Era, Macao Polytechnic Institue, Macao</p> <p>Bardakcı, S. Akkoyunlu, B. Aksu Yıldırım, S., Kozanoğlu, M. D., Uludağ, G., Avşaroğlu, M. D., Nasır, A., Ercan, S., and Elmas, M. [2021]. The Supporting Role of Quality Agencies for a Sustainable QA System: the Training Model in the "New Normal Environment" Re-Imagining Higher Education Quality in an Age of Uncertainty, CONFERENCE 2021 Re-Imagining Higher Education Quality in an Age of Uncertainty [pp.5-16]</p> <p>Sina Ercan, Aslihan Nasir, Abdullah Yasin Gunduz, Gonca Uludag, Sibel Aksu Yildirim, Muzaffer Elmas, Buket Akkoyunlu. The Impact of On-line Simulation Platform on Training of Evaluation Team Members. EQAF 2019, Berlin.</p>
<p><i>Objective 3.3. To create systems to ensure internal and external stakeholders' involvement in processes and ensure that the systems are managed.</i></p>	<p>Uludağ, G., Çatal, S. and Bora, M. [2021]. Türk yükseköğretiminde kalite güvencesi sistemi ve öğrenci katılımının önemi, Trakya Üniversitesi Kalite Ve Strateji Yönetimi Dergisi, 1(1), 91-111.</p> <p>Uludağ, G., Bardakcı, S., Avşaroğlu, M. D., Çankaya, F. Çatal, S., Ayvat, F., Koçer, A., Aksu Yıldırım, S. & Elmas, M. [2021]. Investigation of the higher education students' participation in quality assurance processes based on the theory of planned behaviour: A case of Turkey, Quality in Higher Education, 27:3, 338-356.</p>

Panel recommendation – 3: THEQC should publish the composition and tasks of the Advisory Board on its website.

THEQC's response:

- The information published on the official website about the national and international advisors in THEQC organizational structure has been updated based on their duty areas about which they contribute to the Council actively.¹³ The Council resort to advisor opinions when needed in Council activities. The advisors contribute to the Council regarding their competency areas in this respect. Advisors are assigned with the Presidential decision.

¹³ [THEQC Employees](#)

ESG 3.3 Independence (partial compliance)

Panel recommendation – 1: The review panel recommends that the agency reconsider its structure: an overarching and representative governing body would allow the agency to maintain the representation that it currently has in its staffing profile but this would be at the level of strategic overview. An executive arm, which manages the agency's operations and processes, might then be staffed by permanent appointments to THEQC.

THEQC's response:

- Clause 1 of Article 4 in the Regulation on Higher Education Quality Assurance and the Higher Education Quality Council states that "The Turkish Higher Education Quality Council consists of the Council and the President." Clause 1 of Article 8 states that "The President is the principal administrator of the Council and in charge of the general administration and representation of the Council and executes the provisions of regulations and laws, and decisions taken by the Council." The Regulation states that the President and the Vice-President are elected by the Council. The President and the Vice-President serve full time. Council members responsible for each Commission ensure the flow of information by presenting the Commissions' activities and opinions to the Council's agenda.
- The Presidency and the General Secretariat constitute the executive arm of the Council. General Secretariat consists of Institutional External Evaluation and Registry of External Evaluation Agencies Unit, Publicity and Stakeholder Relations Unit, and Administrative Services Unit. 39 personnel work in the General Secretariat Units. The staff of the units affiliated with the General Secretariat take an active role to conduct commission activities.
- THEQC's organizational structure consists of seven commissions. The Council conducts its activities through Commission on Institutional External Evaluation and Accreditation, Commission on Recognition and Authorization of External Evaluation and Accreditation Agencies, Commission on Promotion and Stakeholder Relations, Commission on International Relations, Students Commission, Commission on Appeals and Complaints, and Ethics Commission on Scientific Research and Evaluation Processes.
- The new commissions, which have been established since the panel's visit in line with THEQC's need, and their duties are given below [Table 3].

Table 3 New commissions and their duties.

Commission	Duties
Commission on International Relations	<ul style="list-style-type: none">-To follow the universal norms and principles in the field of quality assurance in higher education.-To establish international collaboration with counterparts abroad.-To coordinate memberships with umbrella organizations in the field of quality assurance.-To organize various events and benchmarking activities with international stakeholders.-To propose international evaluator candidates to the Council.

	-To strengthen relations with international experts in the field of quality assurance. -To inform the Council about the latest developments and quality assurance problems in higher education.
Commission on Appeals and Complaints	-To assess the appeals filed against the decisions taken within the scope of the Institutional Accreditation Program carried out by the Council and to present the assessment results to the Council. -To assess the appeals filed against the Institutional Feedback Reports published within the scope of the Institutional External Evaluation Program carried out by the Council and to present the assessment results to the Council. -To assess the appeals filed against the Follow-up Reports published within the scope of the Follow-up Program carried out by the Council and to present the assessment results to the Council. -To assess the appeals filed against the decision taken for authorization of national accreditation agencies and recognition of international accreditation agencies and to present the assessment results to the Council. -To assess the complaints regarding the services carried out by the Council and to present the assessment results to the Council.
Ethics Commission on Scientific Research and Evaluation Processes	-To assess applications, documents or data related to the activities carried out by the Council in academic studies. - To conduct an annual evaluation of the applications filed to the Ethics Commission,

Panel recommendation – 2: Related to the above, and in order to improve operational independence, the agency must continue to improve the balance between permanent staff who are on its payroll and those who work as consultants/advisors/experts. The current operational independence of the agency is not assured due to the presence of third parties in the daily job of the agency whose interests may be compromised due to conflicting loyalties related to involvement in the agency's operations.

THEQC's response:

- All employment procedures of THEQC are defined by the Civil Servants Law No. 657, which is binding for all public institutions and organizations in Türkiye, including THEQC, and additional staffing schedules to the founding law. Along with this legally binding issue, THEQC continues its efforts to increase the number of permanent full-time staff and improve the organizational structure in line with its efforts to comply with the ESG, considering the views of the ENQA panel from the last ESG review and directly with the Directorate General of Personnel affiliated to the Presidency of the Republic of Türkiye, regarded as the highest authority in this respect. In this context, staff allocation was made for 6 full-time contracted employees from the Presidency General Directorate of Personnel Principles.
- In this framework, as of March 2022, the number of THEQC employees has increased to 40, including the President, 29 permanent staff and 11 academic experts. In accordance with the higher education legislation in Türkiye it is essential that academic experts who work full time at the Council maintain staff ties to a

university in order to protect both their titles and academic promotion rights. This staff cadre obliges that the payments be made from the same HEI. Except that, academic experts assigned to THEQC or any similar public institution do not have a relationship with their universities in terms of any duties and responsibilities (education-teaching, research-development, administrative duties) during their term of office. Apart from this principle determined according to the legislation, THEQC signs an Ethical Agreement¹⁴ with all its staff members, Council members and external evaluators in order to prevent possible conflicts/coincidences of interest regarding processes. The academic experts are responsible for coordinating and implementing of activities of THEQC in their field of expertise.

- In addition, it is planned to use all the cadres that will be released for THEQC by the Presidency Strategy and Budget Department (the top institution responsible for employment planning in public institutions) in 2022. Taking into account the recommendations of the ENQA panel, THEQC notified the relevant institutions about its employment requirements and obtained the necessary permits to recruit employees above the employment policy determined within the scope of the Strategic Plan. Accordingly, five new experts will be recruited in 2022. These five new experts will be employed for THEQC's main processes. Among them are an industrial engineer for internal quality assurance system, a computer engineer for IT, an officer and two branch managers. This projection is in line with the strategic goals of THEQC.
- In an addition to this explanation, THEQC has defined the authorities and roles of its staff. THEQC developed its own RACI matrices, used as a project management tool while determining process-based and unit-based authorities and roles, for its staff, as a part of its internal quality assurance system. It is explained in detail under ESG 3.5 panel recommendation – 2.

ESG 3.4 Thematic Analysis (partial compliance by the Board decision)

Board decision: The Board would like to use this opportunity to provide an articulation regarding standard 3.4 Thematic analysis, where their judgement differs from that of the panel. Contrary to the conclusion of the panel, the Board notes that the Annual Situation Reports cannot be fully considered as thematic analysis of THEQC as they do not describe and analyse the general findings of the agency's external quality assurance activities. Following this, in the opinion of the Board, the standard can be considered only as substantially compliant with the ESG.

Panel recommendation: Full compliance. No recommendations.

THEQC's response:

- THEQC publishes the thematic analyses regarding its activities and external evaluation activities every year with the "Higher Education Evaluation and Quality Assurance Status Report" (referred to as "Status Report" from this point on).¹⁵
- In line with the ENQA Board's decision, the Council summarised the practices and activities of the previous year firstly while writing the Status Report and then included the findings from Institutional Self-Evaluation Reports (ISERs), Institutional Feedback Reports (IFRs), and Follow-up Reports (FuRs). The Council

¹⁴[THEQC Statement of Confidentiality and Code of Ethics](#)

¹⁵[Higher Education Evaluation and Quality Assurance Status Report](#)

also analysed and evaluated these findings in terms of the Turkish higher education system and the stakeholders. In this process, the data from 2020 were evaluated with an inductive view and by considering the experiences/feedback obtained from previous years.

- The 2020 Status Report consists of seven main sections:
 - The first section presents the general information about the Turkish higher education system and THEQC's activities in 2020,
 - The second section focuses on the contributions of THEQC to HEIs' self-evaluation works, and the results of institutional self-evaluation processes,
 - The third section gives the general information about institutional external evaluation activities in 2020 and the evaluation results,
 - The fourth section elaborates on the HEIs' performance indicators and their relationships with the quality assurance system,
 - The fifth section presents the activities in 2020 of accreditation agencies authorized/recognized by THEQC,
 - The sixth section focuses on stakeholder evaluations regarding the activities in 2020, and
 - The seventh section includes the results from the report in general and the suggestions (for policy-developers, decision-makers, the business world, graduates, HEIs, accreditation institutions, students, and researchers related to the higher education system ecosystem).
- The 2020 Status Report also includes five in-depth analyses in the areas of quality of ISERs, quality assurance in distance education, leadership and transformation in HEIs, research performance of Turkish universities, and student involvement in quality assurance.¹⁶ The subjects of the thematic analyses were shaped in line with the results present in previous years' status reports and various stakeholder opinions. While the thematic analysis reports are created, systematic data collection and analysis processes were carried out. In this direction, qualitative and quantitative research methods, descriptive statistics and content analyses were benefitted.
- For example, an evaluation form was developed in the process of examining the institutional self-evaluation reports, five different experts evaluated the reports through this form, and then all these evaluations were integrated. The first annex of the 2020 Status Report, namely the "Evaluation of Institutional Self-Evaluation Reports and Giving Feedback: A Thematic Review of 2019 Institutional Self-Evaluation Reports¹⁷", presents the results obtained from this study.
- Again, for the thematic analysis study on the quality assurance of distance education processes, an evaluation form containing a set of quality assurance criteria in distance education was sent to all institutions that are active in Türkiye and accept undergraduate students. This form was created in line with expert opinions, based on the THEQC Rubric. One hundred fifty-six institutions that entered the data fully were included in the analysis, and the general status across the country was revealed using descriptive statistics. The results were shared with the public in the second annex of the 2020 Status Report, "Higher Education

¹⁶ [THEQC 2020 Status Report](#)

¹⁷ [Evaluation of Institutional Self Evaluation Reports and Giving Feedback](#)

Institutions' 2020 Status Report on Quality Assurance in Distance Education Activities¹⁸".

- Regarding the research performances of HEIs, the relationships between the maturity levels of the institutions regarding the quality assurance criteria in the field of R&D and the performance indicators in these fields were examined with descriptive statistics. A part of the report written was included in the 2020 Status Report.

ESG 3.5 Resources [partial compliance]

Panel recommendation – 1: The panel recommends that the agency continues to improve the balance between permanent staff who are on the payroll of the agency and those who work as consultants/advisors/experts.

THEQC's response:

- The response to the panel's this recommendation is present in ESG 3.3 panel recommendation-2, written as an answer to the ENQA Panel's Recommendation.
- In this direction, THEQC increases the number of its staff.

Panel recommendation – 2: It is crucial for an agency to build its own capacity and expertise based on its own staff. A clear allocation of tasks and responsibilities in the permanent staff (functional profiles could be useful) and the establishment of an overall staff development plan, including annual training programs, are seen by the panel as useful measures in this field.

THEQC's response:

- Due to the recruitments made since 2020, the number of Council staff, including the President, is 40. The number of permanent staff is 29, and the number of academic experts is 11, as previously explained.
- RACI matrices are employed for a clear allocation of tasks and responsibilities of THEQC staff, which is the panel's first recommendation expressed here.
- THEQC has defined the authorities and roles of its staff. THEQC developed its own RACI matrices, used as a project management tool while determining process-based and unit-based authorities and roles, for its staff, as a part of its internal quality assurance system. In this context, the following roles are defined for each of the work steps identified in the process cards:
 - Responsible: The person who is responsible for implementing and completing the work. Responsibility may be shared in some cases. A determines the degree of responsibility.
 - Accountable: The person who is responsible for the results of the activity or decision. This person is authorized to approve and veto. Only one "A" may be assigned to a duty.
 - Consulted: The person who is consulted for duties and final decisions.
 - Informed: The person who should be informed after taking a decision or step.
- It has been planned to examine RACI matrices vertically and horizontally on an annual basis as a part of internal quality assurance. In this framework, it has been

¹⁸[Higher Education Institutions' 2020 Status Report on Quality Assurance in Distance Education Activities](#)

made possible that conflicts on workload, employment requirements, personnel training, and duty responsibilities and the human resources risks can be managed.

- The allocation of tasks and responsibilities from the President to other staff has been clarified in line with the Panel's recommendation. In this context, the tasks and responsibilities of the staff in the units affiliated to the General Secretariat have been distributed in a way to carry out the secretarial work of THEQC Commissions. Unit staff actively work to carry out commission activities.
- The in-service training programs mentioned in Strategic Plan, Objective 4.2¹⁹ are carried out online and face-to-face. The in-service training objectives set for THEQC's staff development and their realization rates are presented in Table 4.

Table 4 THEQC's in-service trainings by years

Objective	Performance indicator	2019	2020	2021
Objective 4.2. To meet human resources needs of the THEQC by taking into account all its service areas and improve its human resources' competencies.	The number of in-service trainings* for the development of the THEQC staff	2 out of 2 1.Educational Data Mining and Artificial Intelligence Applications 2.ENQA-EQAR External Evaluation Processes	2 out of 3 1.Institutional Social Media Training 2.EFQM Model Training	4 out of 4 1.Official correspondence procedures and principles 2.Effective and Accurate Communication Skills 3.Diction 4.Regulation updates and Legislation training

- As it was explained under ESG 3.1 panel recommendation-2, THEQC further work on in-service training subject in 2022. Also, new plan of in-service training will be added to the 2024-2028 Strategic Plan works to be developed in 2023.

Panel recommendation – 3: THEQC should strengthen the capacity of the core of professional permanent staff.

THEQC's response:

- In-service training works carried out in line with the Panel's recommendation are explained in ESG 3.1 – panel recommendation-2 and ESG 3.5 panel recommendation-2.
- In addition to these explanations, another regular activity carried out is the "THEQC Staff Meeting", with the moderation of the THEQC President, held on Mondays every week in order to keep the employees informed about the current work. The responsible staff inform the entire staff about works conducted on a weekly basis, tasks and responsibilities are monitored, and task distributions are made.
- Another work performed to increase the knowledge level of experts and keep their knowledge up-to-date is the practice of "Training of Trainers" carried out by THEQC before the trainings to be given to external evaluators and HEIs' quality commissions. Before each training, the entire technical team, as well as the

¹⁹ [THEQC Strategic Plan \(2019-2023\)](#)

moderators and assistant moderators, attend the "Training of Trainers", and the training schedule is followed in exactly the same way. The Training of Trainers and trainings to be given to external evaluators and HEIs' quality commissions are designed by an academic expert and an advisor of THEQC who are specialized in educational sciences.

- On the other hand, it is ensured that the experts of the Council follow the studies carried out in the field of quality assurance in higher education at national and international levels to increase the level of knowledge of the staff about the processes carried out in the institution. They are also encouraged to participate in current webinars, workshops, forums, conferences, etc. The experts have attended activities organized by agencies such as ENQA, EQAR, EUA, INQAAHE, APQN, etc. so far.

Panel recommendation – 4: In order to safeguard the future sustainability of the agency, the THEQC's budget should be planned and designed as part of the strategic planning process, taking into account previous year's expenditure and upcoming years planned activities. Annual monitoring of the strategic plan is important in this regard.

THEQC's response:

- In Türkiye, public institutions are obliged to develop a strategic plan in accordance with the Public Financial Management and Control Law No. 5018 and make their budget planning in line with their strategic plans. Public administrations must base their budgets and resource allocation for programs and projects on their strategic plans, annual goals and objectives, and performance indicators to ensure that they provide public services at the desired level and quality.
- Within the framework of this law, the issues related to strategic planning and budget are given below:
 - Public administrations cooperatively prepare strategic plans to form missions and visions for the future within the framework of their development plans, the policies, programs, relevant legislation designated by the President of the Republic of Türkiye, and the basic principles adopted; to determine strategic goals and measurable objectives; to measure their performances according to the predetermined indicators, and to monitor and evaluate this overall process.
 - In the framework of the principles stated in their strategic plans and the Budget Preparation Guide published by the Presidency of Strategy and Budget affiliated to the Presidency of the Republic of Türkiye, public administrations prepare their budget revenue and expenditure proposals accompanied by the statement of reasons and signed by their competent authorities and send them to the Presidency of the Republic of Türkiye until the end of September at the latest.
 - Public administrations must prepare their budgets in compliance with a development plan, the Presidential program, medium-term program, the Presidential annual program, their strategic plans, and the program structure, and based on performance. THEQC, a public administration, prepares its budget in integration with its strategic plan due to this obligation.

- The President of the Republic of Türkiye determines compliance of public administrations' budgets with the performance indicators stated in the strategic plans, the activities to be carried out by the administrations in this respect, and other issues regarding performance-based budgeting. For this reason, THEQC's strategic plan and budgeting processes are executed subject to the issues determined by the Presidency of the Republic of Türkiye.
- Public administrations collect and analyse data objectively, systematically and regularly to monitor and evaluate their budgets, strategic plans and performance programs. Follow-up and evaluation results are shown in the administrative activity reports. Follow-up and evaluation results are communicated to the Presidency of Strategy and Budget in the administrative activity reports and shared with the public.²⁰.

ESG 3.6 Internal Quality Assurance and Professional Conduct [partial compliance by the Board decision]

Board decision: The Board shares the panel's concern that internal quality assurance of THEQC is not taking place in a systematic way, as there are no procedures set and responsibilities are not assigned among the agency staff. In the opinion of the Board, the standard can thus be considered only as partially compliant with the ESG.

Panel recommendation – 1: THEQC should develop a clear definition of responsibilities for internal quality assurance issues within the agency, in order to improve its organization and effectiveness.

THEQC's response:

- Since the ENQA panel visit, THEQC has continued to improve its internal quality assurance system. Within the scope of internal quality assurance works, the duties and responsibilities of the Council determined by law and regulation, and the THEQC Strategic Plan, 29 sub-processes under 5 main processes were determined and workflow charts, performance indicators, risk plans, duties and responsibilities were determined and systematized.
- At the same time, this systematic approach [which integrates strategic management, process management, risk management and feedback management] is managed online through the informatics platform Quality Assurance Management Information System [QAMIS] and the Institutional Management Information System. The system provides electronic monitoring, reporting and updating of strategic management, process management and risk management. Installation procedures of the software system and the strategic plan definition processes have been completed at THEQC, and the process of defining the process cards to the system is in progress²¹.
- Follow-up within the scope of the internal quality assurance system is carried out through performance indicators specific to each process and sub-process, in addition to the performance indicators determined for monitoring the strategic plan. Process performance indicators also include indicators specific to newly

²⁰ [Administration Activity Reports](#)

²¹ [Quality Management Information System, Institutional Management Information System](#)

designed processes, such as the IAP process. As for the performance indicators of the IAP process, the number of targeted IARs per year, the satisfaction level of the evaluation teams, the satisfaction of the evaluated HEI, and the IAR evaluation consistency were defined.

- In this context, performance indicators of the IAP process were also monitored, and this analysis is given in the Table 5:

Table 5. 2020 IAP Process Performance Follow-Up Chart

Performance Indicator	Goal Set	Goal Realized
Number of targeted IARs per year	11	11
Satisfaction level of evaluation teams (5 point Likert scale)	4,00	4,50
Satisfaction level of the evaluated HEI (5 point Likert scale)	4,00	4,40
IAR evaluation consistency	0,850	0,949

- Additionally, another example is the "Quality Management Sub-Process" in which all services given within THEQC are planned, measured and improved. The owner of this sub-process is the General Secretariat, and the executer is the Administrative Services Unit. Also "Process Management Sub-Process" is carried out too. If it is required additional document regarding process management can also be provided.
- In this context, the conduct of stakeholder satisfaction surveys to determine the quality policy, the analysis of the strategic plan and process performance results, and the carrying out of relevant works if the Council is externally evaluated are defined as the activities of this process.

Panel recommendation – 2: THEQC should further use the data they have to really develop the agency's internal quality systems rather than just to comply with external feedback from different stakeholders [see also 2.2].

THEQC's response:

- In line with this recommendation of the panel, follow-up of process performances and internal quality assurance works are supported for THEQC's activities, and internal data is collected regarding these processes. Regarding this panel recommendation, the data obtained by monitoring the process performances and, for example, the data obtained from the IAP process are explained as above (Table 5).
- THEQC developed its own RACI matrices to execute its internal quality assurance activities more systematically. They have been put into practice as of 2022. THEQC identified performance indicators to monitor each workflow matrix. However, as RACI matrices have only just begun to be implemented, these follow-ups are ongoing and have not been reported.

- In addition, THEQC's vision and status in line with its institutional objectives are evaluated by monitoring the strategic performance indicators set in Strategic Plan, and the institutional improvements are made.
- Another way is the improvements made through suggestions and complaints obtained with QAMIS.

Panel recommendation – 3: The panel recommends a full implementation of the Internal Quality Assurance System, with the definition of indicators in all the agency's processes.

THEQC's response:

- Within the scope of internal quality assurance works, 29 sub-processes under five main processes were determined, and workflow charts, performance indicators, duties and responsibilities were determined and systematized. It has been ensured that these are applied to all processes carried out within THEQC. For each main process, a performance indicator has been defined in the form of the success rate average in the goals of the sub-processes. Accordingly, the total number of performance indicators defined for each sub-process is 103. An example is given in Table 5.
- In addition to this work, a risk plan has been created in the scope of the Internal Quality Assurance System. At the same time, this systematic document and demand management is managed with an integrated information management system that allows reporting. In this context, software supply has been completed, and data input and integration works are ongoing. After the system is put into use, annual follow-up and improvement works will be continued through this system.

2.2. ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 Consideration of Internal Quality Assurance (substantial compliance)

Panel recommendation: The panel recommends that the agency provide more focus on the provision of feedback on the ISERs which are elaborated by HEIs, in order to increase the impact of these reports on the quality improvement of institutions and to further develop their capacity to align with the standards in part one of the ESG.

THEQC's response:

- THEQC gives individual feedback to ISERs in line with the panel's recommendations. In this framework, a working group consisting of the experts and the academic members of the Council examined ISERs written in 2019 by 54 institutions that applied to IAP voluntarily in 2020 by employing the Institutional Self-Evaluation Feedback Report. Consistency checks of the reports written for each institution were made by cross-checking by the working group members who are commission members and THEQC staff. The Evaluation of Institutional Self-Evaluation Reports and Giving Feedback²² was written after an analysis of these reports.

²² [Evaluation of Institutional Self-Evaluation Reports and Giving Feedback: A Thematic Review of 2019 Institutional Self-Evaluation Reports](#)

- The findings obtained were shared at sharing meetings held with institution managers, Quality Commissions, and evaluation teams. In addition, in line with the findings obtained from the report, the needs of institutions' quality commissions were determined and used as content in Higher Education Institutions' Quality Commission Training.
- Scores have been analysed in the scope of maturity levels given by HEIs for themselves in ISERs written in 2019, 2020, and 2021. How the grading is made and the related explanations are present in Section 3. Of 189 HEIs, the average score for 2019 ISER is 533, the average score for 2020 ISER is 543, and the average score for 2021 ISER is 687. Maturity levels in ISERs increase as the years pass. A comparison of 2019 ISERs and 2020 ISERs reveals that ISER scores of 76 HEIs decreased averagely by 61 points, and the average scores of these HEIs for 2019 was 586, while their average scores for 2020 was 525. The number of HEIs that increased their ISER scores in 2020 compared to the previous year is 110. ISER scores of these HEIs increased by 60 points, and the average score of these HEIs for 2019 was 495, while their average score for 2020 was 555. It is evaluated that HEIs could not internalize enough the Rubric method, which THEQC started to use in 2019 as of the first year. In this respect, training given to HEIs explains the reason for the development of sub-criterion explanations in the Rubric systematic and the change in the maturity levels after examining them. It is seen that the majority of HEIs increased their scores when 2020 and 2021 ISERs are compared. One hundred eighty-eight HEIs increased their score by 157 points on average in 2021 ISERs, compared to 2020 ISERs. The number of HEIs whose scores decreased is five. One of the most significant factors that enabled this increase in scores is that the Follow-up Program was completed in the majority of the HEIs, and the HEIs performed improvement works. However, simplifying the Rubric and increasing its clarity have been vital factors in this increase. After completing 2022 and 2023 ISERs, it is planned to make a more detailed ISER score evaluation at criteria and sub-criteria levels.

ESG 2.2 Designing Methodologies Fit for Purpose [substantial compliance]

Panel recommendations: The panel recommends THEQC to carry out an internal review of the current evaluation process, as it is very new and will move to one of institutional accreditation; particular focus should be on follow-up and on how stakeholders – in the widest sense and not only those represented in the Council – are involved in the design of methodologies, not just in the review of criteria and processes.

THEQC's response:

- After the ENQA panel's visit, the evaluation method and the documents and guides and training contents to be used were comprehensively evaluated and updated with stakeholder involvement²³ [universities, Quality Commissions, team leaders,

²³ [Meeting with rectors of universities included in 2020 IAP](#)

[Meeting with ARACIS \(Romania\)](#)

[Meeting with NAQA \(Ukraine\)](#)

["Team Leaders Feedback Meetings" within 2019 Institutional External Evaluation Program](#)

[Meeting with international experts \(Teresa and Douglas Franklin\)](#)

[Meeting with the senior administrators of HEIs and National Accreditation Agencies](#)

[Turkey-UK Workshop on Quality in Higher Education](#)

evaluators, students, educational researchers, sector representatives, etc.]. All psychometric studies have been completed on the methodology (Rubric). It is seen that reliability and validity are ensured.

- THEQC Rubric's validity has been addressed as both content and construct validity. To test the content validity, the Rubric form was sent to a group of 10 experts who have academic and application expertise in higher education, quality assurance, and educational measurement and evaluation fields. They were asked to evaluate each sub-criterion as 0 or 1 in terms of relevance for purpose, relevance to content, appropriateness of language, and relevance to the target audience. This process continued by making necessary revisions until all experts evaluate each sub-criterion as "1". To test the construct validity of the tool, an online simulated assessment activity, in which more than 200 evaluators participated with nearly 40 teams, was conducted. Here, a fictional ISER report was independently evaluated by the teams and also by 10 different experts (moderators). In these evaluations, a consistency above the 0.90 level was reached. Then, a reliability form for the THEQC Rubric was conducted on the same participant group, and the results were analysed. The results of all these studies indicate the validity, reliability and consistency of the tool. The results are summarised in the 2020 Status Report.
- Recommendations of evaluation teams, the evaluated institutions, and the experts in this field from Türkiye and abroad regarding the Rubric were collected in 2021, and the Rubric's structure was simplified in line with these opinions. As these simplifications did not change the structure, a new construct validity study was not considered necessary. Moreover, THEQC added an explanation that covers the expectations from that sub-criterion under each sub-criterion to make the use of the Rubric easy. The advisor opinion collection processes were carried out for all explanations.

ESG 2.3 Implementing Processes (substantial compliance)

Panel recommendation – 1: The panel recommends THEQC to further develop clearly defined follow-up activities after Institutional external evaluation.

THEQC's response:

- Follow-up Program has been structured in detail in line with the ENQA panel's recommendation.²⁴ HEIs, whose external evaluation is completed within the scope of the Institutional External Evaluation Program carried out by THEQC, are included in the follow-up process in the second year or following the evaluation year, at the earliest. The Follow-up Program, which was started in 2020, has been monitored with THEQC experts' attendance to site visits as follow-up coordinators. Follow-up coordinators attended site visits only once as this program was implemented for the first time and gave feedback to THEQC about the process. In line with this feedback, the guide was updated. After the Follow-up Program was completed in 2020, the course of the process and its benefit were evaluated with meetings with stakeholders (observers, institution managers, evaluators, etc.), and feedback was received.
- In 2020, 58 HEIs that had previously undergone external evaluation were included in the Follow-up Program. The teams that will carry out follow-up in institutions

²⁴ [The Institutional External Evaluation Accreditation and Follow-up Program Guide \(Version 2.1\)](#)

were created with three persons who involved in external evaluation before. The Follow-up Program was carried out online for one day due to the pandemic. On the other hand, 45 HEIs were involved in the Follow-up Program in 2021.

- All reports of the Follow-up Program are shared with public on the THEQC's website²⁵.

Panel recommendation – 2: THEQC should reconsider the organization of site visits to avoid the implications of conflicts of interest raised by HEIs providing travel, accommodation and meals for the evaluation team; this has the potential to affect the independence and integrity of the process and may become even more relevant with the implementation of institutional accreditation in the near future.

THEQC's response:

- Until a new legal regulation is made related to meeting evaluators' expenses arising from site visits by the Council, the expenses (transportation, accommodation and meeting basic needs) will be covered by the evaluated institutions as per the legislation in force.
- We continue negotiations with the related lawmakers about the amendment of the law in this respect.
- As another explanation for the concerns in the panel's recommendation, it can also be stated that THEQC signs an Ethical Agreement with evaluators before external evaluation and makes both evaluators and HEIs give statements regarding the absence of any conflict or coincidence of interest.

ESG 2.4 Peer-Review Experts (substantial compliance)

Panel recommendation – 1: The panel recommends that THEQC reconsider the voluntary nature of the work of evaluators (and others) who work for THEQC and that it considers the implications of such a situation in relation to the agency's operational independence.

THEQC's response:

- Although it is a voluntary basis work, a lot of people apply to become a THEQC external evaluator as they consider it as a public service. Between 2018-2022 THEQC has received a total of 5748 applications, 1171 of them were included in the evaluator pool. More than 700 evaluator candidates have been trained and 527 of them have been assigned in the evaluation teams.
- Until a new legal regulation is made on this subject, evaluators will work voluntarily in accordance with the legislation in force. We continue negotiations with the related lawmakers about the amendment of the law in this respect.

Panel recommendation – 2: The panel recommends THEQC to recruit experts from outside Turkey, in particular for its external evaluation panels, as well as continuing with current plans for including representatives from the business sector in the evaluation panels.

²⁵ [Follow-up reports](#)

THEQC's response:

- THEQC's external evaluation teams consisted of academic and administrative staff, who were working in HEIs, and student evaluators, during ENQA's external review in 2019. In line with the panel's recommendations, a call for international evaluators to take part in evaluation teams was made through ENQA in 2020.²⁶ An international evaluators pool was created out of the candidates applied. There are currently 66 international evaluators in the pool, 39 of whom are from EU countries.
- First of all, a meeting was held for these evaluators to help them learn about THEQC, and afterwards they received a training for preparing them to attend the Institutional External Evaluation and Accreditation. The training content was the same with the entry-level training created for national evaluators, and additional information and documents about Turkish higher education system were also presented as additional materials.
- International evaluators have to attend the training before taking part in teams, as applies to the national evaluators. The national/international who do not attend the training will not be able to take part in IEEP and IAP teams of the relevant year. 11 [for IAP] international evaluators took part in the teams in 2020, and 16 [12 for IAP, 4 for Follow-up] international evaluators took part in the teams in 2021.
- On the other hand, an amendment has been made in the clause 3 of article 21 in the Regulation on Higher Education Quality Assurance and the Higher Education Quality Council to include business world representatives in the evaluation teams.²⁷

ESG 2.5 Criteria for Outcomes [substantial compliance]

Panel recommendation – 1: The panel recommends THEQC to put in place mechanisms for ensuring the consistency of judgements within external review panels.

THEQC's response:

- First of all, the most important work carried out to ensure external evaluators' consistency in their decisions is the Evaluator Trainings. In these trainings, case studies or reporting works ensure that evaluators judge the matters consistently. Again, the structural standardization of IFR and IAP writing on information system facilitates reports writing by evaluators.
- A Consistency Directive was developed and put into practice as of 2021 to ensure consistency between judgements of external evaluation teams. The purpose of this directive is to ensure the consistency of the reports and decisions resulting from the evaluation programs carried out by THEQC. Commission on Institutional External Evaluation and Accreditation has the primary liability to execute consistency works.
- Reporter groups of two, one is a Commission member and the other is a THEQC expert, carry out the consistency work on evaluation reports. The consistency work is carried out by taking into account the following:
 - 1) Compatibility of the sub-criteria maturity levels in the reports with the report content.
 - 2) Evidence-based evaluation of sub-criterion maturity levels.

²⁶ [International Evaluator Call for Applications](#)

²⁷ [The Regulation on Higher Education Quality Assurance and the Higher Education Quality Council](#)

3) The language of the reports should be objective, and not be judgmental and/or comparative with other institutions.

- After reporters complete the consistency works and write Consistency Evaluation Reports, and the reports are submitted to the Council. The doubted issues in the scope of reports are identified by the Commission, and the consistency evaluation reports and the doubted issues are conveyed to the team leader. The team leader is invited to a meeting with the Commission to discuss the doubted issues. In the meeting held by the team leader and the Commission, if the team leader's explanations and evidence regarding the doubted issues are found sufficient, the original evaluation report written by the team is submitted to the Council. Otherwise, the doubted issues are indicated, and the report is forwarded to the Council. The Council makes the final decision regarding the evaluation reports submitted by the Commission to the Council.
- Table 6 shows that substantially high-level and statistically significant relationships are seen between both the evaluation results, achieved by evaluation teams and THEQC's experts, and the IAR-ISER difference and final evaluation-ISER difference. This strongly illustrates the IAR evaluations' compliance both with THEQC's evaluation understanding and the inter-consistency.

Table 6 2020 consistency work result²⁸

	IAR Score	IAR-ISER difference
Consistency (Final) Score	.949**	
Consistency (Final)-ISER difference		.961**

** p<.01

ESG 2.6 Reporting (partial compliance)

Panel recommendation – 1: The panel recommends that maturity level grades form part of the published reports.

THEQC's response:

- In line with the panel's recommendations, maturity levels are added to all reports (ISER, IFR, and IAR) in written form starting from 2020. Maturity levels can be seen by all stakeholders in these reports shared with public through THEQC's official website.²⁹

Panel recommendation – 2: THEQC should develop mechanisms to ensure consistency not only of the structure of the reports but also of the in-depth analysis they provide.

²⁸ [Institutional Accreditation Program Status Report](#)

²⁹ [Institutional Feedback Reports](#)

THEQC's response:

- Considering the recommendation of the ENQA evaluation panel about the consistency between the reports, improvements were made in the works carried out on the consistency of the reports.
- One of the works carried out to ensure the consistency of the ISERs, IFRs and IAR's is to provide regular, annual trainings to the institution quality commissions (for ISERs) and external evaluators (for IFR/IAR) as part of THEQC external evaluation activities. The trainings comprise modules that include the evaluations of the THEQC Rubric, and participants are presented with content on how to use the rubric by interactively analysing sample cases.
- Another improvement was made immediately after the ENQA panel visit. At the time of the panel visit, regarding the criteria, there were only the sub-criteria, rubric system and sample evidence in the mentioned THEQC Institutional Self-Evaluation Report Writing Guide (V2.0)³⁰. Following the panel's visit to THEQC, the guide was updated and explanations regarding THEQC's expectations about a certain standard were included for each sub-criterion in the rubric system³¹. This update aims at strengthening consistency in understanding the criteria among the different reporting stakeholders (institutions and evaluation teams) using the guide.
- The consistency work which is carried out for ISERs and IARs is explained below.
- ISERs are checked within the scope of the following considerations:
 - The effectiveness of self-evaluation works and stakeholder involvement in the report,
 - The inclusiveness, prevalence, clarity and participation of the work of the quality commission,
 - Objectivity and evidence-based nature of the self-evaluation processes of the institutions (re-scoring THEQC Rubric over ISER and comparison with institutional scores),
 - Adequacy of improvement work.
- As a result of the consistency work, the ISER Feedback Report is written and sent to the relevant HEI. Common problems encountered are identified as a result of the ISER check. Review of the Institutional Self Evaluation Reports and Giving Feedback are shared with the public through a thematic analysis³².
- The consistency work of the IAR's is carried out within the scope of THEQC Consistency Directive. After the IAR is completed by the evaluation team, the report is submitted to the Commission on Institutional External Evaluation and Accreditation where it is checked by a two-person group, one a member of the Commission and the other an expert of the Council, taking into account the following considerations:
 - Compatibility of the sub-criteria maturity levels in the reports with the report content.
 - Evidence-based evaluation of sub-criterion maturity levels.
 - The language of the reports being objective, and not judgmental and/or comparative with other institutions.

³⁰ [THEQC Institutional Self-Evaluation Report Writing Guide \(V2.0\)](#)

³¹ [THEQC Institutional Self-Evaluation Report Writing Guide \(V2.1\)](#)

³² [Evaluation of Institutional Self Evaluation Reports and Giving Feedback](#)

- As a result of the IAR consistency work, a consistency evaluation report is written. According to this report, in case of doubt, if any, the Commission meets the team leader, forms its final opinion accordingly, and submits it to the Council. The Council evaluates the process in question, makes the accreditation decision and submits it to the relevant HEI. The Accreditation decision and Institutional Accreditation Reports are published on the website³³. The Council also prepares a letter containing its decision and the areas for improvement of the institution, and submits it to the relevant HEI.

ESG 2.7 Complaints and Appeals (partial compliance)

Panel recommendation – 1: The panel recommends the agency to clarify the definitions of the terms 'complaints and appeals', ensuring that there is no confusion with and a separation from other mechanisms designed for the purposes of feedback.

THEQC's response:

- In 2019 when the ENQA panel visit was made, the appeal to be filed against the IFRs published in the scope of the Institutional External Evaluation Program conducted by THEQC was addressed in Article 12 of the Institutional External Evaluation Directive, titled "Appeals". Moreover, the appeal process regarding the authorization and recognition activities for accreditation agencies were defined in the part "Appeals" of Chapter 4 of the Guide on the Authorization, Recognition, and Follow-up of External Evaluation and Accreditation Agencies. In addition, other stakeholder opinions such as recommendations, complaints, or satisfaction were taken as feedback in written form or orally through stakeholder meetings, THEQC's institutional communication tools, etc.
- Complaints and appeals processes have been improved in line with the ENQA panel's recommendations.
- Within the scope of the ESG 2.7 standard, the Complaints and Appeals Directive was created³⁴ and the Commission on Complaints and Appeals³⁵ was established within the scope of the aforementioned directive. The Commission on Appeals and Complaints carries out its processes within the scope of this directive.
- The appeal and complaint process covers the external evaluation activities carried out by THEQC, the objections to the recognition and authorization decisions of accreditation agencies, and the complaints about the services rendered. The main purpose of the process is, in line with the institutional goals and values of THEQC, to provide services in an open and accountable manner, to be fair in decision-making and to secure the rights of stakeholders.
- Upon notification of the appeal or complaint to the Council, the process is managed through the information management system³⁶. Both process tracking and performance indicators can be calculated through the information management system. According to the directive, a preliminary review of the appeal or complaint uploaded to the system is made by the Commission secretariat within 7 days. Following the preliminary examination, the appeal or complaint is placed on the agenda of the Commission and the relevant parties are contacted if additional

³³ [Accredited Institutions and Their Reports](#)

³⁴ [THEQC Directive on Appeals and Complaints](#)

³⁵ [THEQC Commissions](#)

³⁶ [Quality Information Management System \(QAMIS\)](#)

information and documents are needed. The Commission evaluates the appeal/complaint in accordance with the relevant regulation and in the light of the information and documents provided within 30 days at the latest, and submits it to the Council. The Council makes its final decision within 30 days at the latest, and the final decision is notified in writing to the relevant person/institution.

- Since the directive came into effect, THEQC has not received any appeals but one complaint. The application was made regarding the fact that teaching staff who work under the title of lecturers could not apply as an evaluator, although the evaluator applications within the scope of 2020 IEEP were not specified otherwise in the relevant legislation. The process regarding this application was operated in accordance with the THEQC Directive on Appeals and Complaints and was concluded in favor of the applicant.

Panel recommendation – 2: The panel recommends that the agency ensures that its website clearly differentiates between pages that allow users to submit feedback and those that include information of separate processes for making a complaint or an appeal.

THEQC's response:

- THEQC established the THEQC Feedback Management System to receive stakeholder feedback through its official website. This information management system enables the communication of all kinds of information request, recommendation, demand, satisfaction, complaint or appeal to THEQC.³⁷ As recommended by the panel, a separate button was added to the homepage of THEQC website to increase visibility of a complaint and appeal channel under the information management system and draw attention of stakeholders.

Panel recommendation – 3: The agency should supplement what is currently in the legal article to document and publish clear processes for complaints and appeals on its website.

THEQC's response:

- To realize this recommendation, THEQC added the Complaints and Appeals Directive to 'Legislation' page under 'About us' tab on the official website, as a separate document.³⁸ On the other hand, those, who want to file a complaint or appeal through the official website, can click on this button directly, then they will view a pop-up window showing the directive and the explanation regarding the process. They are informed about the legislation, in this way. When they close this window, they are directed to the website on which they may file their complaints and appeals.

Panel recommendation – 4: The agency should ensure that any new mechanism for dealing with complaints and appeals allows for a degree of independence from the Council in order to avoid any conflict of interest.

THEQC's response:

³⁷ [Quality Information Management System](#)

³⁸ [THEQC Related Legislation](#)

- THEQC Appeals and Complaints Directive also includes the matters related to the organization of the related Commission. In this respect, Commission members are determined independently of the Council and in a way to avoid any conflict of interest³⁹:
 - a) One of the Commission members should be a former Council member.
 - b) One of the Commission members should have experience in evaluation processes.
 - c) One of the Commission members should have administrative experience in an accreditation agency.
 - ç) Current members of the Council cannot be members to the Commission.
- The Commission members' term of duty is three years. One cannot be a Commission member for more than two terms. Two of the members serving in the current Commission are former Council members, one is a former external evaluator and the other is a representative of the stakeholder institution (the Vocational Qualifications Authority).

3. MAJOR DEVELOPMENTS and CHANGES in THEQC's QA ACTIVITIES

Until 2022, according to the Regulation on Higher Education Quality Assurance and the Higher Education Quality Council all HEIs in Türkiye were included into the Institutional External Evaluation Program (IEEP) by THEQC at least once every five years. To this end, THEQC has evaluated 185 of 207 HEIs in Türkiye within the scope of the IEEP since 2016. However, with the new amendments made in the regulation, institutions that are evaluated within the scope of the IEEP are now included in the Institutional Accreditation Program (IAP). The IEEP will continue to be carried out as a preparation program for IAP only for institutions that will be evaluated for the first time [institutions that have graduated their first cohort of students]. One of the most important reasons for this change is that institutional accreditation has more solid results and includes an accreditation decision in line with the opinion most commonly expressed by the stakeholders. Moreover, it is known that the importance given to institutional accreditation is increasing with global developments and trends. THEQC, as a national organization, has developed the IAP by taking these issues into account in order to improve the relevant processes.

In this section, the Institutional Accreditation Program (IAP), which is the new external evaluation activity implemented by THEQC since the panel visit, is explained briefly. The IAP is an external evaluation method that enables the evaluation of quality assurance, learning-teaching, research-development, service to society and governance system processes in HEIs within the scope of the "planning, doing, checking and acting" cycle.

The IAP is carried out by the evaluation teams formed by the THEQC within the scope of the Institutional External Evaluation and Accreditation Criteria and the Institutional External Evaluation, Accreditation, and Follow-up Program Guide.

Each year, the HEIs to be included in the IAP are determined by THEQC and evaluation teams are formed in accordance with the structure of these HEIs. One preliminary

³⁹ [THEQC Directive on Appeals and Complaints](#)

meeting about the ISERs and two visits (pre-visit and site visit) are carried out by the aforementioned evaluation teams to the relevant HEIs.

As a result of the preliminary evaluations and visits, Institutional Accreditation Reports (IAR) are written by the evaluation teams and a decision regarding accreditation is made by THEQC considering these reports. Although the basic processes of IAP are similar to the Institutional External Evaluation Program (IEEP), there is an accreditation decision made for the relevant HEI at the end of the IAP process.

There are 5 headings, 22 criteria and 56 sub-criteria in Institutional External Evaluation and Accreditation Criteria. The maturity level of each sub-criterion will be determined by the evaluation team within the scope of the Institutional Accreditation Program; and the general approach to the maturity level of the sub-criteria is as follows: In the evaluation, the maturity level of "5" corresponds to the full score, and the maturity level of "1" corresponds to the lowest score. The IAP score chart is included in the appendix of Institutional External Evaluation, Accreditation and Follow-up Program Guide⁴⁰.

In the IAP to be carried out within the scope of Institutional External Evaluation and Accreditation Criteria, evaluation will be based on the following grading;

- Quality Assurance System 200,
- Learning and teaching 400,
- Research and Development 150,
- Service to Society 100 points and
- the Governance System 150 points, all totalling up to 1000 points.

The following decisions can be made by THEQC within the scope of the IAP:

- Full accreditation (for five years)
- Conditional accreditation (for two years)
- Decision of rejection of accreditation

Higher education institutions whose accreditation has been rejected can re-apply to IAP two years after the decision at the earliest. HEIs evaluated in the IAP are exempt from IEEP. So far, HEIs have been included in the IAP as a result of a call made for volunteering HEIs. 11 HEIs, included in IAP in 2020, have been accredited and announced on the official website of THEQC. The decisions for 13 HEIs, included in IAP in 2021, 5 of them have been announced. According to the regulation, all HEIs will be included in the IAP until 2027.

Table 7 shows the compliance of THEQC Institutional Accreditation Program criteria (V2.1) with Part I of the ESG.

⁴⁰ [Institutional External Evaluation, Accreditation and Follow-up Program Guide \(V2.1\)](#)

Table 7 Compliance of THEQC External Evaluation and Accreditation Criteria (V2.1) with ESG

Standards in Part 1 of ESG	Institutional External Evaluation and Accreditation Criteria of THEQC
1.1. Policy for Quality Assurance	A. Quality Assurance System A.1. Mission and Strategic Goals A.2. Internal Quality Assurance A.3. Stakeholder Involvement E. Governance System E.1. Structure of Governance and Administrative Units
1.2. Design and Approval of Programs	B. Learning and Teaching B.1. Design and Approval of Programs
1.3. Student-centred Learning, Teaching and Assessment	B. Learning and Teaching B.3. Student-Centred Learning, Teaching and Evaluation
1.4. Student Admission, Progression, Recognition and Certification	B. Learning and Teaching B.2. Student Admission and Progression
1.5. Teaching Staff	B. Learning and Teaching B.4. Teaching Staff
1.6. Learning Resources and Student Support	B. Learning and Teaching B.5. Learning Resources
1.7. Information Management	E. Governance System E.3. Information Management System
1.8. Public Information	E. Governance System E.5. Public Disclosure and Accountability
1.9. On-going Monitoring and Periodic Review of Programmes	B. Learning and Teaching B.6. Follow-up and Updating of Programs
1.10. Cyclical External Quality Assurance	A. Quality Assurance System A.2. Internal Quality Assurance

	A. Quality Assurance System A.4. Internationalization C. Research and Development C.1. Research Strategy C.2. Research Resources C.3. Research Competence C.4. Research Performance D. Service to Society D.1. Service to Society Strategy D.2. Service to Society Resources D.3. Service to Society Performance E. Governance System E.2. Resource Management E.4. Support Services
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