



AVEPRO

FOLLOW UP REPORT ON ENQA  
RECOMMENDATIONS

FEBRUARY 2016



## ***Introduction***

In drawing up this report AVEPRO has taken into consideration the observations and recommendations of the ENQA-appointed Panel, which were based on the 2005 version of the ESG. In some cases, where appropriate and feasible, attempts have been made to update the recommendations in accordance with the new version approved in 2015.

The report of the ENQA-appointed external evaluation team came to the following conclusions regarding AVEPRO's compliance with the ESG.

<b>CRITERION</b>	<b>COMPLIANCE</b>
- ENQA criterion 1a / ESG Part 2: External quality assurance processes	Substantial compliance
• ESG 2.1: Use of Internal Quality Assurance Procedures	Substantial compliance
• ESG 2.2: Development of External Quality Assurance Processes	Full compliance
• ESG 2.3: Criteria for Decisions	Full compliance
• ESG 2.4: Processes Fit for Purpose	Substantial compliance
• ESG 2.5: Reporting	Substantial compliance
• ESG 2.6: Follow-Up Procedures	Substantial compliance
• ESG 2.7: Periodic Reviews	Substantial compliance
• ESG 2.8: System-Wide Analysis	Full compliance
- ENQA criterion 1b / ESG 3.1, 3.3 Activities	Full compliance
• ESG Part 3.1:	Full compliance
• ESG Part 3.3:	Full compliance
- ENQA criterion 2 / ESG 3.2: Official status	Full compliance
- ENQA criterion 3 / ESG 3.4: Resources	Substantial compliance
- ENQA criterion 4 / ESG 3.5: Mission statement	Full compliance
- ENQA criterion 5 / ESG 3.6: Independence	Full compliance
- ENQA Criterion 6 / ESG 3.7: External QA criteria and processes used by the agency	Full compliance
- ENQA Criterion 7 / ESG 3.8: Accountability procedures	Substantial compliance
- ENQA Criterion 8 / Miscellaneous	Full compliance



The report also stated that “The review ENQA Panel is satisfied with the fast development and consolidation of the Agency and its activities, as well as with the professionalism and commitment demonstrated by AVEPRO’s management, staff and stakeholders. At the same time, the review Panel encourages to take further appropriate actions to consider and implement recommendations provided”.

➤ In detail:

• **ESG 2.1 – Use of Internal Quality Assurance Procedures** (Pg. 16)

AVEPRO should revise its evaluation method in order to more fully encompass expectations for internal quality assurance arrangements within all types of higher education institutions, as laid down in ESG part I.

AVEPRO appreciated the Panel’s recommendation in relation to ESG 2.1 (2005 version) and has included in its strategic plan a specific task aimed at the revision of the internal (and external) evaluation guidelines in the light of the new version of the ESG (2015). This task will begin in 2016 and will seek to employ the indications and guidelines to be prepared by other Agencies with full membership of ENQA, as well as ideas deriving from the outcome and output of specific ongoing or recently concluded projects (in particular EQArep and EQUIP).

However, it is important to emphasise (in line with the explicit indications in guideline 2.1 of the ESG 2015 and the results of the meta-analysis of the evaluations conducted to date), “QA in Higher Education is based on Institutions’ responsibility for the quality of their programmes and other provision [...], to ensure the link between internal and external quality assurance, external quality assurance includes considerations of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance”.

The application of this guideline in the light of the organizational context in which AVEPRO works involves elements that demand particular attention, i.e.:

- The peculiarity of the Ecclesiastic Faculties that are part of State Universities;
- The responsibility of the Institutions, which may be subject to a “double regime” of regulations (that of the Holy See and that of the country in which they are based);
- The different emphases and maybe even requirements arising from the need of some Institution to seek State accreditation (with significant levels of heterogeneity between different European countries) and undergo quality evaluation on a single “universal” basis as conducted by AVEPRO;
- The limits (not only in financial terms) deriving from State funding or, formally-speaking, “national” or regional independent accreditation bodies, which often also entails a de facto acceptance of the courses or Institutions in relation to the mission and vision of Ecclesiastical Institutions.

The Agency will take all these elements into consideration when reconsidering its guidelines for internal evaluation. Moreover the current evaluation process, which to a large extent derives from international best practices, and above all from the EUA’s Institutional Evaluation Procedure, has been judged very positively by the Institutions that have undergone the whole evaluation cycle to date.



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• **ESG 2.4 – Processes Fit for Purpose** (Pg. 22)

The Panel welcomes the participation of student members within the teams but encourages AVEPRO to make greater efforts to bring cohesion to the involvement of students in the processes of the Agency and in quality assurance matters on the ground within the Ecclesiastical Universities and Faculties.

As stated in the report of the ENQA-appointed Panel, the role of students has always been at the core of AVEPRO's organizational development. According to the AVEPRO Statute, both the Scientific Council and the Board of Directors must have a student representative. This rule has remained unchanged in the new version of the Statute (approved in 2015), despite the fact that several changes have been made to the composition of the two governing bodies.

The presence of students on the AVEPRO-appointed review panels has been constant since 2012, in spite of the difficulty of finding students in possession of a series of requisites (above all language skills and some level of familiarity quality assurance-related issues) within the Ecclesiastical Faculties.

Aware of this difficulty, and in compliance with the ENQA Panel's recommendations, AVEPRO, alongside the Congregation for Catholic Education, has supported the institutionalization of an Association of Students of the Pontifical Universities based in Rome ([www.asupr.org](http://www.asupr.org)). This Association also represents an important "hub" for AVEPRO itself and some students/members have already been involved in the evaluation of Ecclesiastical Academic Institutions. While aware that this and other instruments for the involvement of students in QA processes need to be reinforced, the Agency believes that it has already set out on the right path in relation to the recommendation under point 2.4 of the 2005 ESG.

• **ESG 2.5 – Reporting** (Pg. 23/24)

AVEPRO should reinforce requirements in relation to the various review panels so that they fully follow the Agency's guidance in all aspects of external reviews, in particular adhering to the single standard report form developed. The Agency may also be willing to learn from ENQA's EQArep project on best practice in publishing reports, and to adjust its performance accordingly.

AVEPRO has closely considered the Panel's recommendation and has looked at the issue in depth by conducting an analysis of the evaluation processes conducted between 2012 and 2014. Regarding the question of the evaluation reports, specific areas of criticality have been identified, which in part reinforce and confirm the indications received from the ENQA-appointed team. In this context, the Agency itself has also begun a process of learning. The initial reflections arising from this process have identified the following possible areas for improvement:

- a) *Documentation and formats*: greater visibility needs to be given to the formats that the Agency proposes for the preparation of the reports (both internal and external); it may be appropriate to adapt them according to Institutional dimensions (e.g. individual Faculties and Institutions with two or more Faculties).
- b) *External Evaluation Reports*: the "recommendations" and "observations" provided by the Teams need to be more visible, in order of priority, and easily identifiable.
- c) *Homogeneity of External Evaluation Reports*: the role of external experts needs to be strengthened, their motivation improved, and the creation of a small stable group that fulfils the role of expert evaluators may be envisaged.



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- d) *Process dynamics*: evaluation does not end with the visit, but continues with the definition of the QIP and especially with the internalization of resources, competences and people who act within the Institution to reinforce the Quality culture.
- e) *Training of experts*: Training needs to be improved for experts, including ad hoc meetings on territorial/linguistic bases.
- f) *Flexibility of the approach to evaluation and instruments*: The higher education system also needs to be analyzed on the basis of linguistic and territorial “clusters”.
- g) *Single method for the preparation of Reports*: The languages in which the reports are written should gradually be limited to Italian and English.

Some of these points are already being implemented, for example the evaluation phase at the Ecclesiastical Faculties in Spain has already begun and two information seminars have been organized during which, amongst other topics, the need to adhere as closely as possible to the Agency’s guidelines has been underlined, also in relation to the preparation of self-evaluation reports; this allows the external team to follow their check list and consequently the structure and the index of the external evaluation report.

Other aspects highlighted by the ENQA Panel and confirmed in the study conducted by AVEPRO are currently in the adoption phase, such as the creation of a single format for reports. The results of the EQArep project demonstrate that “QA reports vary greatly between countries and agencies but also between programme and institutional reports. In addition, comprehensive and summary reports - and even editing practice, structure, content, length, readability, accessibility, etc. - within a single agency differ considerably”<sup>1</sup>.

In the case of AVEPRO this aspect is particularly significant because, as mentioned previously, the structure of the Holy See’s Higher Education System comprises Institutions located in different countries, with which different/diverse concordats may be in place. The differences between Academic Institutions (for example in size) is a further distinctive element that makes rendering the evaluation reports more homogeneous somewhat complex.

The conclusions of the EQArep project acknowledge the fact that the reports are not currently comparable and that this entails threats and challenges (transparency itself: misuse or manipulation of information; comparability/benchmarking; losing sight of the actual purpose of the reports (usefulness for the institution); overrating the potential value and interest for wider public/lay reader; oversimplification; standardisation: comparing apples with pears; language issues)<sup>2</sup>.

While AVEPRO shared one of the initial aims of the project [EQArep], which was to develop a European template for comprehensive reports, this was deemed by the project consortium as unfeasible due to the differences in QA procedures and systems of higher education and the specific needs of stakeholders and authorities relating to the particular political framework of external QA in higher education<sup>3</sup>.

Acknowledging this aspect (and not underestimating AVEPRO’s need to harmonize its own processes, procedures and outputs in relation to heterogeneous contexts), the Agency has launched a

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<sup>1</sup> ENQA Occasional Papers 21, “Transparency of European Higher Education Through Public Quality Assurance Reports (EQA rep) Final Report of the Project, Brussel, Belgium 2014, page 42.

<sup>2</sup> ENQA Occasional Papers 21, page 43.

<sup>3</sup> ENQA Occasional Papers 21, page 44.



phase of review of its own evaluation guidelines (especially in the light of the 2015 ESG), which entails a revision of the references for the preparation of both Self-Evaluation Reports and external evaluation reports.

The new guidelines (in accordance with the results of EQArep) will provide for the publication of Summary Reports containing limited information that is easily comparable, such as:

- Information about evaluation
- Type and focus of the evaluation (e.g. Institutional audit, study programme)
- Link to the comprehensive report
- Information about the Institution evaluated

The comprehensive report should be well-structured and easy to read, a list of contents should be provided at the beginning of the report in order to facilitate the finding of specific information.

The report should clearly describe the process, recommendations, commendations and the context of the review, and it should be published online (easily accessible) and in an easily printable format<sup>4</sup>. Taking into account all these considerations, AVEPRO nonetheless intends to render the external evaluation reports increasingly homogeneous and comparable.

#### • **ESG 2.7 – Periodic Reviews** (Pg. 26)

The team is hopeful that the necessary preparations for the development and facilitation of AVEPRO's work are under way, to ensure the proper conduct of the external reviews for all higher education institutions that belong to the system of the Holy See. Respecting the international commitments of the Bologna Process, all types of higher education institutions in their own right are expected to take into due consideration and act to implement the provisions of ESG part I.

With reference to the evaluations conducted in the period 2011-2015, AVEPRO evaluated approximately 40 Institutions, within which approximately 80 Ecclesiastical Faculties operate. The faculties are present in 7 different European countries and, as mentioned several times previously, both the local and institutional contexts vary significantly from one case to another.

Having said that, it should be emphasised that with its current resources AVEPRO has nonetheless completed (in more than reasonable time) 100% of the evaluations requested by Ecclesiastical Academic Institutions. This fact may be interpreted as showing that the Faculties and Academic Institutions have difficulty realizing their own evaluation processes. To this end the Agency is seeking to establish relationships of cooperation with various stakeholders in different local contexts to engage them in supporting the academic Institutions. In this context, it is important to remember that one of AVEPRO's institutional purposes is to "promote" a culture of quality within academic Institutions belonging to the Holy See's Higher Education system; this promotion is achieved by building relationships and common languages and by sharing processes, not a bureaucratic obligation.

These years of experience have demonstrated to the Agency that, even if its resources were increased, the aim of a review every 5 years is too ambitious. Moreover, various experiences in both Europe and the USA have shown that the period can be extended to 7 years (for example) without compromising the efficacy of the evaluation. It should be underlined here that "compliance" with the evaluation deadlines is the responsibility of the Academic Institution, and the current laws in force do not give AVEPRO any power of sanction in the case of non-compliance.

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<sup>4</sup> ENQA Occasional Papers 21, page 48.



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Moreover, the revision of the Agency's Statute has permitted a review of its territory-based organization; the organizational model hypothesized at the outset of AVEPRO's evaluation activities has turned out to be difficult to implement for administrative, organizational and management reasons. At the same time, experiences of collaboration with other national Agencies have allowed AVEPRO to experiment with alternative ways of conducting site visits and drawing up evaluation reports. To date AVEPRO has collaborated with various national Agencies in different European countries, conducting very interesting prototype experiences. All of these Agencies are ENQA members.

To conclude, the Agency will discuss the issue of the frequency of reviews with both the Scientific Council and the Board of Directors (currently under renewal due to the end of their mandate, the members will be appointed by Pope Francis in 2016). The possibility of prolonging the evaluation cycle will probably be brought to their attention. AVEPRO will also continue to seek forms of active cooperation with national Agencies, with the aim of rendering the evaluation process as efficient and effective as possible for the academic Institutions.

• **ESG 3.2 – Official status** (Pg. 32)

Given the global presence of Ecclesiastical Universities and Faculties, and the possibility of their division into the regional subcomponents, the Agency is encouraged to discuss, together with relevant administrative bodies in the Holy See's structures, the necessary prerequisites for its greater international visibility and active involvement in ENQA.

As described in other sections of this report and in that sent to ENQA in February 2015, AVEPRO acknowledges the centrality of the issue of the resources at its disposal. Concerning the possibility of organizing the Agency into territorial branches, the amendments made to the Statute indicate a preference for alternative routes, i.e. the definition of ad hoc forms of cooperation with local Institutions, first of all national QA Agencies, as well as, naturally, the Academic Institutions. This does not mean that the possibility of territorial branches has been definitively ruled out: the hypothesis remains open, but an organizational and management model would first need to be found; the likely characteristics of such a model would currently not be easy to reconcile with the rules of the Holy See.

Having said that, it appears obvious that greater cooperation with ENQA and other (not only European) networks active in the field of QA represents one of the Agency's strategic objectives. AVEPRO has participated in all the EQAF realized to date and has also participated in the general assemblies and fora organized by ENQA. The Agency's work is frequently supported by elements, methods and results that derive from both projects realized by or in collaboration with ENQA (EQArep and EQUIP, for example), and from publications and occasional papers published by ENQA. In short, it is acknowledged that the Agency's work could become more visible with greater resources, but there is no doubt that its involvement with ENQA (and, on an individual level, with many national Agencies belonging to the Network) is already significant.

• **ESG 3.3 – Activities** (Pg. 30)

The Agency, together with relevant units within the Holy See's administrative structures, is encouraged to take further action to secure appropriate staff and other resources enabling AVEPRO to fulfil its duties on a five-yearly basis. AVEPRO could also engage in joint activities and benefit from mutual learning with other agencies which are members of ENQA.



As mentioned above (2.7 Periodic Review), AVEPRO is following the two lines indicated by the ENQA-appointed Panel: reinforcing cooperation with other national Agencies (examples in this sense are AQ Austria, SKVC, Lithuania, A3Es in Portugal) and acting to ensure the regularity of evaluations (albeit not every 5 years). The issue of resources has been dealt with in a previous report sent to ENQA in February 2015, and although availability has been confirmed by the Holy See's administrative and organizational structures, to date it has not been possible to increase the human resources available. As known, the entire administration of the Holy See is undergoing profound review, which has also an indirect impact on the organization of AVEPRO.

Lastly, the review of the Agency's Statute represented an opportunity to enter into even closer contact with other units and services of the Holy See's administration, which has permitted a sort of widespread diffusion of the Agency's needs. In short, we are certain that the highest authorities are aware of AVEPRO's activities and that the current temporary conditions and unfavourable circumstances are the only impediment to increased resources, with the consequent possibility of conducting a greater number of activities in a satisfactory manner.

• **ESG 3.4 – Resources** (Pg. 34)

The team concludes that the development of the review processes and procedures to meet the needs of the medium and long-term future will require additional financial resources and significantly increased staffing resources. We recommend this matter receives the urgent concern of the appropriate offices in the Holy See.

As mentioned in the report sent to ENQA in February 2015, the Agency has focused its efforts on obtaining greater resources, both financial and human. In this situation of general crisis, within which cutbacks and budget cuts are frequent, AVEPRO has managed to maintain, and in some cases increase (in relation to certain budget items) its financial resources.

The Holy See is conducting a drastic reorganization of its administrative organization, also following the creation of the Secretariat for the Economy. AVEPRO, like the other Institutions belonging to the Roman Curia, is implementing specific financial management policies which, amongst other things, require training and time to ensure that the structures increasingly adhere to international standards.

Following the re-approval of the Agency's Statute, AVEPRO sent a request to the Secretariat of State for the renewal of its Board of Directors. The appointment of the members will be made by the Pope himself. At the same time, a request was again made for more staff. The Agency is certain of the support of both the Congregation for Catholic Education and the Secretariat of State, although the combination of process of reform and financial crisis has not yet allowed this appreciation to be translated into an effective increase in staff.

As demonstrated during the course of the review by the ENQA-appointed Panel, AVEPRO also continues to count upon support from the network of academic Institutions, Episcopal Conferences and Apostolic Nunciatures, which provide a service to the Agency in a spirit of pure cooperation, for example by supporting certain organizational processes, without in any way compromising AVEPRO's autonomy.



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• **ESG 3.8 – Accountability procedures** (Pg. 39)

When talking to esteemed members of the Board of Directors and the Scientific Council, the Panel saw their dedication to serving the Agency and also willingness to contribute to the reconsideration of the current arrangements of these two advisory bodies in order to more energetically support the Agency's work, at the same time permitting some saving of resources.

The panel reiterated in AVEPRO's evaluation report that the accountability procedures (especially the "internal" ones, i.e. those regarding the administrative structure of the Holy See) are satisfactory. It was suggested that AVEPRO "provide yearly reports that would have less details but more synthetic and analytic in nature" (page 39 of ENQA's Panel Report of the external review of AVEPRO).

In accepting this recommendation, the Agency has drawn up two documents: the first a summary of the evaluations conducted at the Roman Institutions (presented on the occasion of a seminary day at the Pontificia Università Urbaniana on 12 March 2015), and the second, which is still being prepared, regarding models and guidelines for the definition of a strategic plan for the Ecclesiastical Academic Institutions.

Concerning the involvement and the organization of the two "Boards", AVEPRO maintains that the new version of the Statute clarifies whether it is necessary and useful to have two governing bodies or whether (as partially suggested by ENQA) resources should be optimized and, consequently, only one should be maintained; the various Dicasteries of the Roman Curia usually have an authority for steering and governance (e.g. the Congregation's Assemblies) and a "Consulta", or council, which is a group of experts who can be referred to for non-binding opinions on specific issues brought up by the head of the Dicastery.

From this viewpoint a similarity can be seen between the Board of Directors and the Plenary Assemblies on the one hand, and the Scientific Council and the Curia's "Consulta" on the other.

In order to avoid duplication the new version of the Statute defines the activities and fields of action of the two governing bodies in a more detailed manner. In particular the Board of Directors should be the body in which strategies and lines of action are discussed and should be composed of members expert in the field of Higher Education and Quality Assurance. The Scientific Council should be composed of a group of QA experts to be consulted on specific topics, or for the preparation of particular reports or instruments.

Moreover, the Board of Directors could meet more frequently while the Scientific Council could be convened only upon a specific request from the President.

AVEPRO therefore deems that it has found a way of adopting the "substantial" part of ENQA's recommendation (that of focusing on organizational aspects and better allocating resources), planning (in particular regarding the Scientific Council) to use communication technologies as much as possible (thus reducing costs for journeys and travel) and create small ad hoc groups to work on specific projects. A working group on the strategic planning of the Ecclesiastical Academic Institutions is currently in the pilot phase.



## ***Conclusions***

AVEPRO wishes to conclude this second report by thanking the ENQA Secretariat and Board and the Panel that conducted the evaluation visit. Almost two years from the achievement of full membership, the Agency has embarked upon and is constantly reviewing strategic reflections regarding its own objectives. ENQA membership has had an impact in terms of both internal organization and especially dialogue with the world of the Holy See's Institutions of Higher Education. While aware that this path is and will always be a long one, as well as in some ways complex, we are convinced that we are collaborating with all the stakeholders to achieve a change of paradigm regarding the idea of a "culture of Quality" in our Academic Institutions. Considering the specific nature of the Agency (probably the only one in the world with global competence and Institutions to be evaluated spread over 5 continents), we are convinced that the European HE Area also represents an opportunity to support a process of learning to be spread and disseminated, as far as realistically possible, also beyond the boundaries of Europe.