
ENQA AGENCY REVIEW: NATIONAL ENTITY FOR ACCREDITATION AND QUALITY ASSURANCE IN HIGHER EDUCATION (NEAQA)

DORIS HERRMANN, DURDICA DRAGOJEVIC, PEDRO TEIXEIRA, IGNAS GAIZIUNAS
20 FEBRUARY 2020

Contents

EXECUTIVE SUMMARY.....	3
INTRODUCTION.....	5
BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS.....	5
BACKGROUND OF THE REVIEW	5
MAIN FINDINGS OF THE 2017 REVIEW	5
REVIEW PROCESS	6
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY	7
HIGHER EDUCATION SYSTEM	7
QUALITY ASSURANCE	8
NATIONAL ENTITY FOR ACCREDITATION AND QUALITY ASSURANCE IN HIGHER EDUCATION.....	9
NEAQA'S ORGANISATION/STRUCTURE	9
NEAQA'S FUNCTIONS, ACTIVITIES, PROCEDURES	10
NEAQA'S FUNDING	14
FINDINGS: COMPLIANCE OF NEAQA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG).....	15
ESG PART 3: QUALITY ASSURANCE AGENCIES.....	15
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	15
ESG 3.2 OFFICIAL STATUS	18
ESG 3.3 INDEPENDENCE	19
ESG 3.4 THEMATIC ANALYSIS	22
ESG 3.5 RESOURCES	23
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	25
ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES.....	27
ESG PART 2: EXTERNAL QUALITY ASSURANCE	28
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	28
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	32
ESG 2.3 IMPLEMENTING PROCESSES.....	35
ESG 2.4 PEER-REVIEW EXPERTS	39
ESG 2.5 CRITERIA FOR OUTCOMES	43
ESG 2.6 REPORTING	46
ESG 2.7 COMPLAINTS AND APPEALS.....	48
ADDITIONAL OBSERVATIONS	52
TIMING OF THE REVIEW.....	52

SUPPORT TO INSTITUTIONS	52
MOVING TOWARDS GREATER INSTITUTIONAL RESPONSIBILITY	52
CONCLUSION	53
SUMMARY OF COMMENDATIONS	53
OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS	53
SUGGESTIONS FOR FURTHER DEVELOPMENT	55
ANNEXES	57
ANNEX 2: TERMS OF REFERENCE OF THE REVIEW	62
ANNEX 3: GLOSSARY	69
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW	70
DOCUMENTS PROVIDED BY NEAQA	70
OTHER SOURCES USED BY THE REVIEW PANEL	70

EXECUTIVE SUMMARY

This report analyses the compliance of the National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an ENQA-coordinated external review conducted between April to December 2019 with a site visit to Belgrade, Serbia, between 9 and 11 October 2019. NEAQA was established as an independent institution in 2018, and it is considered to be a legal successor of the Commission for Quality Assurance (CAQA). CAQA was established in 2005, and had been a full member of ENQA since 2013 and listed in EQAR since 2014. CAQA continues to exist as a professional body of NEAQA. This is thus considered to be the third review of NEAQA. The agency is applying for renewal of its ENQA membership and EQAR registration. The last review took place in 2017, and resulted in CAQA gaining the status of a member under the review with ENQA. This review is thus taking place 2 years later, to potentially enable NEAQA to continue being an ENQA member. It is the opinion of the panel that the review was probably premature, as the system saw a major change with the new 2017 Law on Higher Education and NEAQA started functioning less than two years ago. In comparison to CAQA as its legal predecessor, NEAQA has changed the role of CAQA to act as a decision-making body. NEAQA also introduced independent peer panels who write published reports and conduct site visits, which was both done by CAQA members in the past. However, this was the major change in the procedures, while the standards used have not changed substantially, and a number of recommendations from the 2017 report remain to be implemented, which was also reflected in this panel's assessments of compliance.

NEAQA conducts initial and periodic accreditation reviews of higher education institutions and programmes to ensure compliance with minimum requirements, and institutional-level audits aimed at quality enhancement but also with a possibility to end in a formal removal of accreditation. All processes are mandatory for institutions, with their frequency predetermined by Law (and relatively frequent, with 7-year accreditation cycles and audit mid-cycle). NEAQA received initial funding from the state budget, but it is supposed to be funded only from accreditation fees paid by higher education institutions in the future. NEAQA structure and functioning are largely predefined by the Law. Its decision-making body is a seventeen-member CAQA which is composed exclusively by academics, divided in sub-commissions when working, according to their various fields. Operatively the agency is overseen by the Management Board, which also includes students and labour-market representatives, and run by the Director and the General Secretary, who heads the small Secretariat of nine full-time staff. Even though not formally part of NEAQA, the National Council for Higher Education, a government body composed of academics, labour-market representatives and students, has an important role in NEAQA functioning. It adopts NEAQA regulations and standards, it creates the lists of experts for NEAQA panels, it suggests CAQA members to NEAQA Management Board, and it functions as an appeals committee which has the legal possibility to change CAQA decisions as a last resort.

The Law on Higher Education provides NEAQA with a clear legal basis for its regular external quality assurance activities and for the outcomes of its processes to be recognised by its stakeholders. NEAQA's work is appreciated by the stakeholders, and they all put much emphasis on the need for such an institution in the Serbian higher education system which is characterised by a low level of trust in newly established institutions, but also charges of complacency with the old ones - the quality of which is not questioned. In comparison to its predecessor, NEAQA's independence was strengthened by the establishment as an independent institution and change in the procedure of CAQA's appointment. While the role of National Council, as a government body, can be seen as a threat to

NEAQA independence, the panel agreed on seeing its role as part of a system of checks and balances which should ensure that there is no single body making all the decisions. NEAQA independence as an institution also means that it now has full-time staff which should be able to devote themselves to developmental work, produce thematic analyses, participate in international exchanges and projects, etc. However, again probably due to review timing, none of this has as yet taken place, and there remains the need to develop this, as well as overall NEAQA internal quality assurance. NEAQA's funding model as based solely on fees remains to be tested. While there is no question that NEAQA currently has sufficient funds, it is not clear if this will remain so in the next year, when government seed funding is spent and the number of reviews is increased.

NEAQA's external quality assurance processes and decisions are based on published standards and procedures which are detailed and cover Part 1 ESG to a substantial degree. There is evidence that the consistency of the assessments has improved with the changes in the procedure. The same is true of the developmental orientation of the reports, which are now published. However, NEAQA has implemented very few procedures in line with the new methodology, and no audits among them, which means that the evidence is limited. Much work remains to be done on understanding and implementing the ESG, and as noted by the 2017 report, improving the effectiveness of HEI's internal quality assurance and encouraging institutions to take the primary responsibility for quality. NEAQA had little time to engage in substantial discussions with stakeholders on the fitness for purpose of its processes and how its procedures and criteria can be changed. The change should aim to: alleviate the institutional burden, make procedures more flexible and thus better adapted to different types of institutions, focus on quality development rather than quantitative indicators, and increase the robustness of the procedures so that they are sufficiently challenging for the institutions. While in comparison with its predecessor NEAQA did improve the way it implements processes, the way it works with peer-review experts, and the way it writes and publishes the reports, much still needs to be done to further increase the quality of the agency's work. The steps that the panel recommends always revolve around devoting more time and providing mechanisms for deeper reflection with the stakeholders and self-reflection. In other aspects, such as introducing a complaints body, NEAQA did little even though it was required to do so by the 2017 report.

The review panel has found NEAQA to be fully compliant with ESG 3.2 and 3.7; substantially compliant with ESG 3.1, 3.3, 3.5, 2.4, 2.5 and 2.6; and partially compliant with ESG 3.4, 3.6, 2.1, 2.2, 2.3 and 2.7. It has made recommendations under most of the ESG and a number of suggestions for further development. Despite the 'partially compliant' judgments under six ESG, the panel concludes that NEAQA is, overall, in substantial compliance with the ESG. The reason for this is the level of visible improvement that did take place since 2017, and the need to understand NEAQA in the context of Serbian HE which is in a large degree determined by the Law and characterised by a relatively low level of institutional autonomy. The panel hopes that NEAQA will understand the positive assessment as an encouragement to continue working on implementing the recommendations of the 2017 review and this report. In this context, and again due to the timing of this review, a follow-up report will be important, and it would be well if all types of procedures would be implemented with reports available by the time it is drafted.

INTRODUCTION

This report analyses the compliance of the National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA) (*Nacionalno telo za akreditaciju i proveru kvaliteta u visokom obrazovanju, NAT*) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in a six-month period from April to December 2019.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. Commission for Accreditation and Quality Assurance (CAQA) has undergone its second ENQA review in 2017, which resulted in CAQA gaining the status of a "member under review", which was inherited by NEAQA as CAQA's legal successor. Due to the legal and organisational changes that took place in the meantime, the current review is organised as full review and thus, NEAQA's third review. The panel is thus expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2017 REVIEW

The panel of experts that reviewed CAQA, the legal predecessor of NEAQA, in 2017 with the report published in 2018, established that in the performance of its functions, CAQA was overall in substantial compliance with the ESG. The panel found CAQA to be partially compliant with seven of the ESG but wished to emphasise that in four cases (standards 2.2, 2.3, 2.4 and 2.6) this resulted mainly from one issue in the overall design of the EQA system in Serbia. The issue was that CAQA members acted as the core group of peer-review experts conducting EQA processes, with only limited involvement of external experts, and CAQA was the decision-making body in these processes. Additionally, CAQA was conceived more as a committee of experts than a fully-fledged QA agency, which had implications for how effectively it could perform its planning and management functions and this had also to a smaller extent influenced the panel's judgments under ESG 3.1, 3.5 and 3.6. Overall the panel's assessment was as follows:

- fully compliant with ESGs 3.2 (Official status) and ESG 3.7 (Cyclical external review of agencies);
- substantially compliant with ESGs 3.3 (Independence), 3.4 (Thematic analysis), 3.5 (Resources), 2.1 (Consideration of internal quality assurance) and 2.5 (Criteria for outcomes);
- partially complaint, as noted above, with ESGs 3.1 (Activities, policy and processes for quality assurance), 3.6 (Internal quality assurance and professional conduct), 2.2 (Designing methodologies fit for purpose), 2.3 (Implementing processes), 2.4 (Peer-review experts), 2.6 (Reporting) and 2.7 (Complaints and appeals).

The recommendations made by the panel of the 2017 review are noted under each standard. The panel also commended CAQA for commitment to its mission and doing its job in a way which is genuinely appreciated by its stakeholders despite tough accreditation decisions it had made (ESG 3.1), sustained and successful efforts to safeguard its independence within the constraints placed by the national legislation (ESG 3.3), addressing very comprehensively student involvement in internal quality assurance as part of its standards for audits (ESG 2.1) and, finally, publishing the Guide to accredited HEIs and programmes as a useful source of information for prospective students (ESG 2.6).

Finally, it should be noted that the panel visited CAQA at the time when the current, 2017 Law on Higher Education was already adopted, as well as the 2017 standards for QA, however they have not been implemented at the time of the review and were thus not considered.

REVIEW PROCESS

The 2019 external review of NEAQA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NEAQA was appointed by ENQA and composed of the following members:

- Doris Herrmann, Managing Director, Agency for Quality Assurance through Accreditation of Study Programmes, Germany, Chair, quality assurance professional (ENQA nominee)
- Durdica Dragojevic, Head of the Department for Higher Education Quality, Croatian Ministry of Science and Education, Croatia, Secretary, quality assurance professional (ENQA nominee)
- Pedro Teixeira, Associate Professor, Faculty of Economics, University of Porto; Director, Centre for Research in Higher Education Policies (Cipes), Portugal, Panel member, academic (EUA nominee)
- Ignas Gaižiūnas, Student in Physics, study programme Theoretical Physics and Astrophysics, Vilnius University, Lithuania, Panel member, student (ESU nominee)

Goran Dakovic from ENQA acted as the review coordinator, and also participated in the site visit to the agency.

Self-assessment report

In April 2019 the team for preparation of the self-assessment report (SAR) was appointed by the NEAQA Director, whose members were nominated by the Managing Board. The team consisted of the Director, Secretary General, four members of CAQA, three Managing Board members of which two are labour market representatives, and three students' representatives, which is an important improvement to the previous report in the creation of which no stakeholders have participated. The first draft version of the report, made on the basis of the previous CAQA and ENQA reports, was made by NEAQA staff and sent to the SAR team for further improvements. Like the previous CAQA report, it includes analysis made based on the answers of higher education institutions and peer-reviewers to the questions regarding the establishments of NEAQA and new system, which were collected during meetings and trainings conducted by CAQA members. The survey focused on the expectations from the new system rather than providing comments on the SAR. Finally, in May SAR was adopted by the Board and sent to ENQA on 31st May 2019.

Site visit

The site visit programme was prepared in cooperation with the NEAQA liaison person. On the day preceding the visit the panel had an internal preparatory meeting. The visit took place between 9 and 11 October 2019. The panel interviewed all key stakeholders, including the SAR working group, NEAQA's members and staff, academic experts, students and employers involved in NEAQA processes, and representatives of higher education institutions and their conferences, students' conferences and the national authorities. The visit was well organised. The meetings were conducted efficiently, despite the interpreting provided in most meetings. At the end of the visit, the panel had an internal meeting to agree on conclusions from the review and a debriefing for NEAQA on the main findings. For details, see the site visit agenda in Annex 1.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Serbian higher education is governed by the 2017 Law on Higher Education (LoHE); the Law is complemented by the 2018 Law on the Qualifications Framework and at the time of the site visit, a Law on Dual Education with relevance to higher education was coming into force. Higher education covers programmes at three levels, with each type of programme having its own category in the qualifications framework: (1) first-cycle programmes which include basic academic programmes (180-240 ECTS) and professional programmes (180 ECTS), leading to the degree of Bachelor, Bachelor with Honours (240 ECTS) or Bachelor (Appl.) respectively; (2) second-cycle programmes, including master academic (60-120 ECTS) and professional (120 ECTS) programmes, leading to the degree of Master or Master (Appl.) respectively; and specialist academic and professional programmes, both bearing 60 ECTS and leading to a Specialist degree / diploma; and (3) third-cycle programmes / studies leading to a PhD degree, with 180 ECTS (with at least 300 ECTS earned earlier) and a dissertation as the final part of the programme. Master's degree programmes in medical fields are offered as long-cycle programmes of 360 ECTS. LoHE defines a specific grading system with grades from 5 (fail) to 10 (excellent).

According to LoHE, a university has to have accredited academic study programmes in at least 3 scientific/artistic fields at all 3 levels. University constituents – faculties and arts academies – can be separate legal persons if they have 3 accredited programs or more, and are considered separately within institutional accreditations. There are however also universities without other legal persons as constituents. Additionally, while normally constituents deliver programs and the university acts as a central administration, it can also independently deliver programs and some do. There is a total of 18 accredited universities in Serbia, 9 owned by the state and 9 private, and they have a total of 124 accredited faculties – 86 state and 38 private. They are represented by the Conference of Universities (CONUS).

Academic studies at first two levels can also be delivered by colleges (higher schools) of academic studies, of which there are five. Applied courses are delivered by 61 colleges of applied studies, of which 70% are state-owned. LoHE established 'academies of applied studies' and the process is ongoing during which the existing state-owned colleges will be merged into such academies. These institutions are represented by the Conference of Academies of Applied Studies and Colleges of Academic Studies (CAASS).

Table 1: types of HEIs and the differences in assessment (source: NEAQA)

Type of institution	Assessment in the accreditation process
University	<ul style="list-style-type: none">- It has to have all levels of studies within minimum of three fields and three research areas defined in the Article 37 of LoHE;- it has to have an accreditation for scientific research organisation by the National Council for Scientific and Technological Development – NCSTD.
Faculty	<ul style="list-style-type: none">- it has to be part of the university;- if it is a legal person it has to have accreditation for scientific research organisation by NCSTD.

Higher school of academic studies	- in case of accreditation for master studies it has to have an accreditation for scientific research organisation.
Academy of applied studies	- standards for its accreditation are under development; - recently formed academies are consisted of state higher schools of applied studies.
Higher school of applied studies	- special attention in accreditation is on its connections to the labour market.

There is about 240 000 students in Serbia, 80% of which study at state-owned universities. The students are organised in the Student Conference of Universities (SCONUS) and Student Conference of Academies of Applied Studies and Colleges of Academic Studies (SCAASS). Regarding the number of students, the system is very uneven as the University of Belgrade has 95 000 students and 50 000 study at Novi Sad University, so only two universities make up more than a half of the system.

QUALITY ASSURANCE

The first Serbian Commission for Accreditation was set up in 2002 and tasked with evaluating newly established private HEIs and developing an accreditation methodology; in 2005, a new Law on Higher Education introduced the principles of the Bologna reform to Serbia and established **Commission for Accreditation and Quality Assurance, CAQA**, as a body of the **National Council for Higher Education (hereinafter: NCHE; the National Council)** with the administrative support provided by the Ministry of Education and NCHE serving as an appeal body. For more than a decade, CAQA functioned in a manner that was in principle unchanged, performing programme and institutional accreditations in five-year cycles and audits (referred to as external quality assurance or external quality control in the law) in between the accreditations, together with initial programme and institutional accreditations for newly-established HEIs. CAQA was composed by 15 academics proposed by CONUS and appointed by NCHE, to whom in 2015 two CAASS representatives were added. The reviews were done by anonymous academic experts selected by NCHE and supplemented by site visits by sub-commissions composed of CAQA members joined by student and employer representatives selected by the student organisations and the Chamber of Commerce. The sub-commission prepared an overall report, integrating experts' assessments and proposing to CAQA a final decision. The Ministry of Education, Science and Technological Development (MoESTD) issued and revoked operating licences, without an option to change CAQA decisions. NCHE and CAQA periodically changed the standards in use, always on the basis of standards as defined by the law, and the last such change took place in 2017. By that time, CAQA has completed two accreditation cycles and one audit cycle, and was starting the third cycle of accreditations.

HEIs have since 2005 been required by law to set up an internal body responsible for IQA and carry out a self-evaluation at least every three years. Such a body is composed of teaching and non-teaching staff and students and is responsible for self-evaluation. Self-evaluation obligatorily takes into account findings from student course evaluations. As of 2019, a new job description was included by MoESTD in the catalogue of positions at HEIs to enable employment of quality managers.

In October 2017 new LoHE established new body for accreditation– National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA)– and CAQA was put in technical mandate in February 2018. All rights and obligations, documentation, accreditation requests, equipment and archives were transferred to NEAQA that applied for the ENQA review in 2018.

NCHE has kept its quality assurance role also in the new law: it suggests the list of reviewers to be nominated to the CAQA pool, and CAQA members to the NEAQA Board; it adopts EQA standards on the suggestion of NEAQA and IQA standards on the suggestion of the two HEI conferences, and serves as the appeals body of NEAQA. NCHE has 17 members appointed by the Government, observing the gender balance: 6 academics at the proposal of CONUS and 2 at the proposal of CAASS; 7 experts/academics proposed by MoESTD, and 2 representatives of the Chamber of Commerce. It is also stipulated by LoHE that NCHE invites 2 representatives of the 2 student organisations to participate in its work on issues relevant to them.

NATIONAL ENTITY FOR ACCREDITATION AND QUALITY ASSURANCE IN HIGHER EDUCATION

NEAQA was established on 9 February 2018 by the decision of the Government of the Republic of Serbia. The decision states that NEAQA is an independent legal entity established for the purpose of performing accreditation and quality assessment of HEIs and their units, study programmes and quality assurance in HE. The legal provisions also formulated the appointing of the acting director; the Board was formed in May 2018 and elected the director (the same person appointed as the acting director) in July. NEAQA is the successor of CAQA established in accordance with the LoHE from 2005. CAQA itself was transformed from a body of NCHE to the expert body of the newly established NEAQA, and new members were appointed by the NEAQA Management Board (the Board) upon the proposal of NCHE, meeting in the new composition for the first time in August 2018. NEAQA took over all accreditation requests not completed according to the old law, more than 300 of them submitted before December 2018, and the new CAQA (i.e. NEAQA) is completing them in line with the old procedures.

NEAQA'S ORGANISATION/STRUCTURE

According to the LoHE, NEAQA is composed of managing body, the executive body, the professional body and professional services which perform the administrative-technical tasks.

The management body of NEAQA is the **Managing Board (hereinafter: the Board)** consisting of seven members, appointed by the Government every four years. The Government appoints members of the Board upon the proposal of the following institutions: one member by CONUS from full professors of the university, one member by CAASS from professors of applied studies, two members by the Serbian Chamber of Commerce, and three members by the Ministry. Its members are elected for a period of four years, with the possibility of another re-election. The student representative is nominated by SCONUS as an associate member of the Board, based on the decision of the Board.

The Managing Board: elects and dismisses the director of NEAQA, and oversees their work; elects and dismisses the members of CAQA on suggestion by NCHE; adopts the annual programme of work and the financial plan, upon the consent of the Government; adopts the Statute upon prior consent of the Government; adopts general acts and coda; determines the amount of accreditation fee, with the consent of the Government.

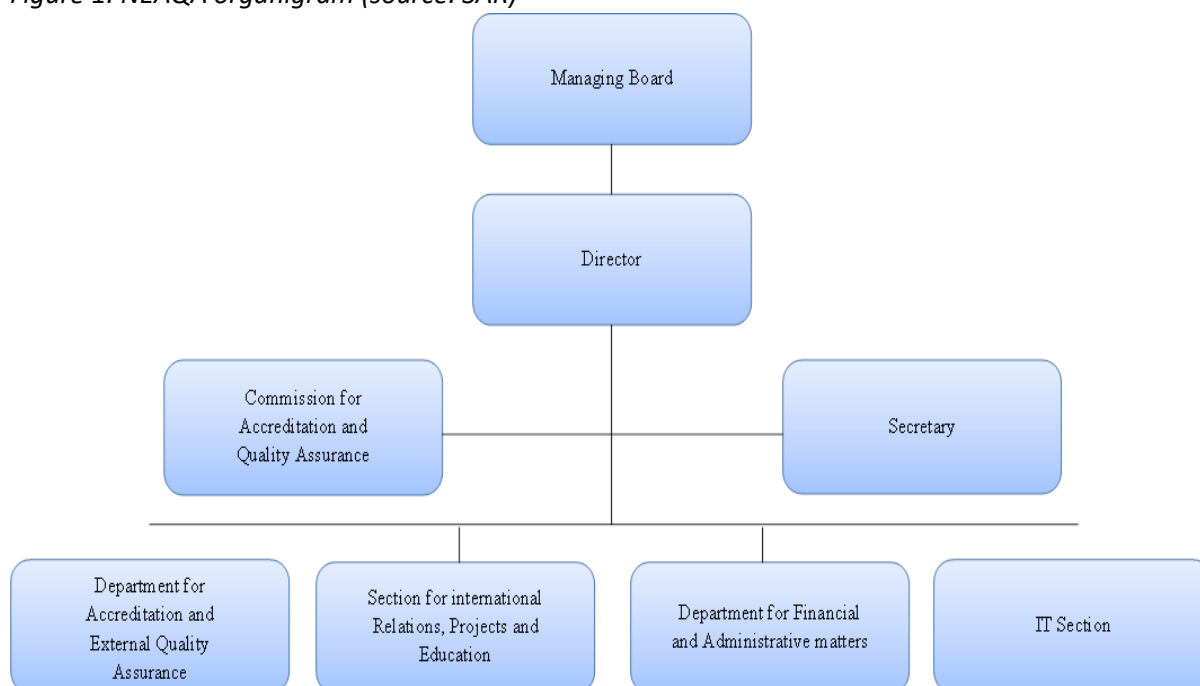
The **Director** is elected by the Board based on a public competition, among full professors of the university who have experience in managing and assuring quality in higher education for a period of five years, with the possibility of re-election. The Director represents NEAQA, manages and organises its work, operations and staff, implements the decisions of the Managing Board, appoints reviewers from the lists defined by NCHE, at the proposal of CAQA, and passes all CAQA decisions.

While it is still completing procedures inherited from the previous **CAQA**, the new CAQA's tasks are to propose review panels and accreditation standards and procedures, and serve as the expert and

decision-making body of NEAQA. The members of CAQA are elected every five years through an open call by the Managing Board, at the proposal of the National Council, respecting the gender equality and representation of the educational-scientific, i.e. educational-artistic domains. CAQA elects the President and Vice-President from among its members and establishes sub-commissions to perform its tasks, e.g. prepare decisions etc. In its work, CAQA cooperates with more than 800 external experts.

The **Secretariat** is the internal organizational unit which performs administrative and professional support activities of NEAQA, managed by the Secretary. The Secretary coordinates and manages the work of the administrative and professional service, takes care of the preparation of the materials for the sessions of the bodies of NEAQA, monitors their work and formulation of decisions, coordinates their work in accordance to the instructions of the Director, executes decisions of the bodies that are in the competence of the administrative and professional service and acts upon the decisions of the Director, takes care of the protection of the assets of NEAQA, keeps the seals of NEAQA, etc. In addition to the Secretary, the Secretariat currently employs 2 more legal experts and 5 more staff members working directly on QA procedures. While in the pilot procedures the Secretary acted as a coordinator at all site visits, it is planned that all of them act as site visit coordinators, accompanying and briefing panels, and most already have this experience from working for CAQA. NEAQA employs additional 2 support staff, and more support staff, e.g. for finances and IT, are hired through temporary contracts.

Figure 1: NEAQA organigram (source: SAR)



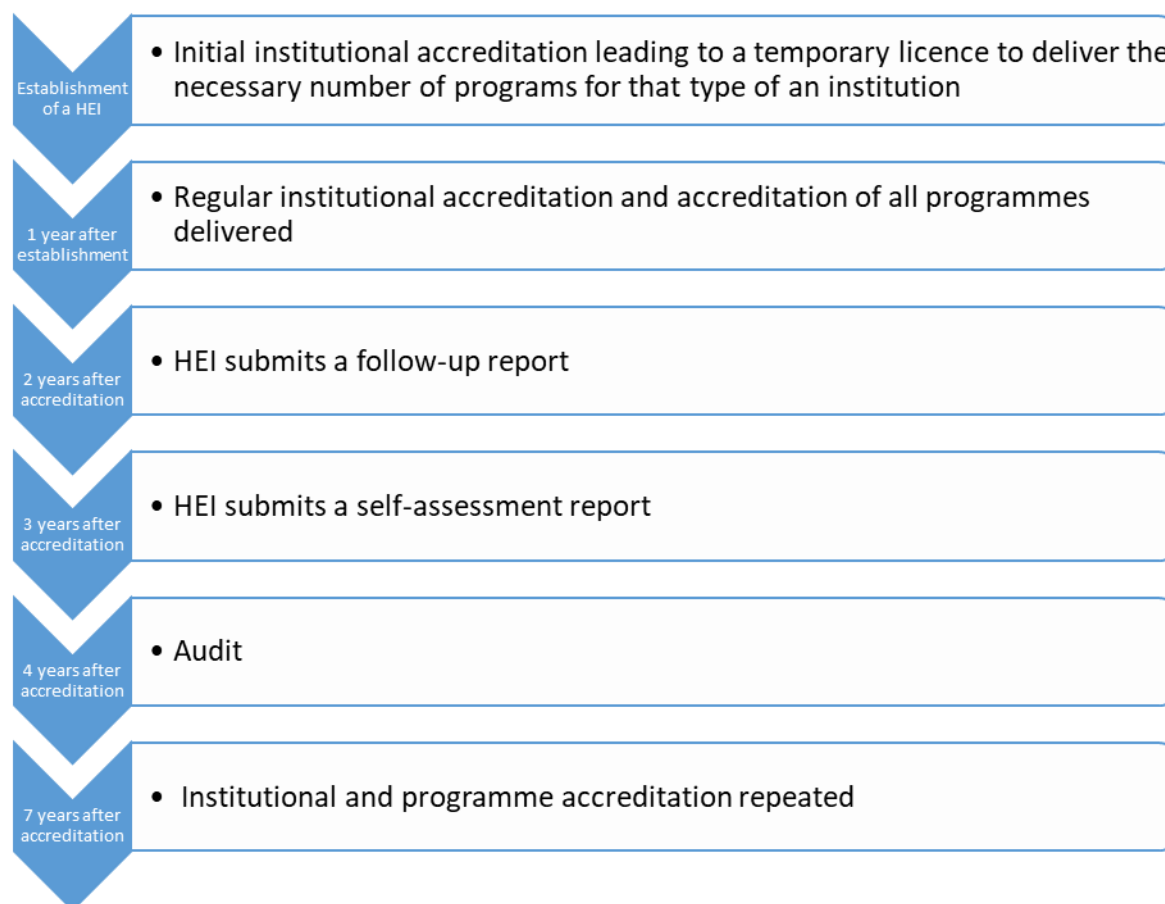
NEAQA'S FUNCTIONS, ACTIVITIES, PROCEDURES

According to LoHE, NEAQA performs the following procedures:

1. Initial accreditation of higher education institutions (HEIs)
2. Initial accreditation of programmes (also applied to existing programmes when they are changed more than 20%)
3. Regular, periodic accreditation of higher education institutions (HEIs)
4. Regular, period accreditation of HEI programmes
5. 'Externa quality control of HEIs' - audit of HEIs' internal quality assurance (IQA) systems.

The timeline of the procedures, defined by LoHE, is shown on the figure below.

Figure 2: the timeline of various NEAQA procedures



Thus, the same basic procedures have been kept from the previous period, with procedural changes described in the table below.

Table 2: Comparison of NEAQA old and new procedures (source: NEAQA)

	The agency's old QAA procedures	The agency's new QAA procedures
Cycle	Period accreditation every 5 years, audit mid-cycle	Period accreditation every 7 years, audit mid-cycle
Launching the procedure	The accreditation request submitted to CAQA	The accreditation request submitted to NEAQA which issues the certificate on completeness of the documentation
Finding experts	CAQA appoints two reviewers	CAQA proposes members of the expert panel and NEAQA director appoints the panel
Reporting	Two anonymous experts check the documentation and give the evaluations	Peer review panel checks the documentation and goes to a site visit in order to complete a report and propose a decision

Decision-making process	Two reports of the reviewers are delivered to a sub-commission, which performs site-visit and makes a report with the decision proposal to CAQA	Report is sent to CAQA's sub-commission which forwards it to CAQA
Issuing the decision	CAQA makes decision and issues a decision and the formal certificate ("uverenje" or "rešenje")	CAQA makes and issues the decision and NEAQA issues the formal certificate ("uverenje" or "rešenje")

As noted, NEAQA has inherited more than 300 procedures to be completed according to the old model. According to the SAR, 246 were completed by May 2019. The remaining 'old' procedures are to be completed no later than 2020 according to the information from the site visit. In 2018 NEAQA completed 6 institutional and 37 programme periodic accreditations and 3 initial accreditations, and in 2019 it completed 12 institutional and 107 programme periodic accreditations and 4 initial accreditations.

Table 3: The number of old and new procedures implemented by NEAQA with outcomes (source: SAR)

For year 2018	
Accreditation of HEIs	6 positive
Accreditation of study programmes;	37 (35 positive and 2 negative)
Initial accreditation of HEI and study programmes;	3 (1 positive and 2 negative)
External quality control – audit.	0
For year 2019	
Old procedure	
Accreditation of HEIs	12 (positive 11 and 1 negative)
Accreditation of study programmes;	107 (92 positive and 15 negative)
Initial accreditation of HEI and study programmes;	4 (1 positive and 3 negative)
External quality control – audit.	0

New procedure by 8 July 2019	
Accreditation of HEIs	0
Accreditation of study programmes;	5
Initial accreditation of HEI and study programmes;	0
External quality control – audit.	0

New procedural documents were adopted by the National Council and officially published by March 2019. As before, there are separate regulations for programme and institutional periodic accreditation, audit and self-evaluation of HEIs (which serves as a basis for audit). The key change is that CAQA members no longer participate in site visits, but make decisions solely on the basis of the report of the panel whose members are no longer anonymous, and include a student and a labour market representative. The procedure is the same in all cases: a sub-commission of CAQA proposes the composition of a Peer-review Panel for accreditation of HEI/programme/initial accreditation/audit consisting of five members (three academics, one student and one labour market representative) to CAQA which submits its final proposal to the NEAQA Director. The Director further appoints a peer-review panel with a president, and a Coordinator from the administrative and professional services of NEAQA. The decision on the appointment of a peer-review panel for accreditation is published on the NEAQA website. The panel drafts the preliminary report, and then goes to the mandatory site visit, after which the report is completed and sent to the HEI which has 15 days to correct factual errors. The corrected report is submitted to CAQA which can then ask the panel for clarifications.

Based on the regulations, separate forms, templates and tables are available for different types of HEIs (one for universities and academies of applied studies, another for faculties and colleges) and programmes (one for scientific and one for artistic PhDs, and one for first and second cycle programs), and are supplemented by templates to be used by the panels. At the time of the site visit, a new separate set of standards was being prepared specifically for the academies of applied studies. SAR reported that according to the new procedure 5 accreditations of study programmes were completed, and by the site visit 5 HEIs had one or more programme accredited, and 2 of those also received institutional accreditation.

Institutions are established through **initial program and institutional accreditation**. A new HEI needs to fulfil of a number of conditions defined by the LoHE and NCHE regulations regarding the number and area of study programmes, infrastructure, employed staff etc. The founder then prepares the documentation defined by NEAQA regulations, and after the accreditation procedure a decision on initial accreditation or refusal of the request is brought by CAQA. A positive decision on initial accreditation of the HEI is sent to the Ministry for issuing an operating licence to the HEI that is valid for only one year. After one year, HEI has to undergo **regular, periodic institutional and program accreditation** procedure. Even though each program accreditation is legally a separate procedure, led individually from the panel appointment to the final decision, these often - when possible due to different deadlines of QA activities - take place through one site visit, and panel members are in that case shared among programmes. If successfully accredited, after 2 years the HEI will report to CAQA on the progress in implementing the recommendations. After 3 years, HEI will perform a **self-evaluation** and submit it to CAQA as a basis for **audit** which will be done 4 years after the last accreditation – if that one did not result in an earlier audit deadline, which is an option foreseen by the regulations. Audit will only have a follow-up after no more than 6 months if shortcomings are

identified – but if these are not corrected, accreditation may be revoked to a programme or the whole HEI. After successfully completing an audit, new periodic accreditation follows in 3 years.

A HEI can at any time submit a new programme to undergo initial programme accreditation. It is also obliged by LoHE to submit an existing programme to CAQA for evaluation if it is changed more than 20%. However, if new programs have been launched in the meantime, these will not necessarily fit the schedule, and it is possible that HEI will have programme reviews within the 7-year periods in which it undergoes its institutional accreditation.

HEI will continue to send all new programmes to initial programme accreditation and submit any programs in which more than 20% is changed to a partial programme accreditation procedure. The new programme will undergo periodic accreditation after 7 years, not necessarily fitting with the timeline of periodic accreditation of the institution and its other programmes.

NEAQA'S FUNDING

Until the establishment of NEAQA, CAQA's financial and administrative work was performed by the MoESTD. The financial account of CAQA was attached to the Ministry and its revenues and expenditure was attached to the budget of the Ministry. As an independent legal person NEAQA has its own account. The Ministry still provides it with premises in a large government building free of charge, and has provided seed funding of about 150 000 euro to establish offices, acquire equipment etc., but does not plan to fund it further. NEAQA is meant to be funded solely through fees which were thus increased to about 15 000 euro for initial institutional accreditation, 5000 euro for periodic institutional accreditation or audit and 2700 euro for programme accreditation, with small variations in price for different types of institutions and programmes. As it started being fully operative only in the second half of the year, NEAQA was left with a surplus approximately equal to government funding in 2018, and plans to use this to sustain itself in 2019 according to the published financial plan.

FINDINGS: COMPLIANCE OF NEAQA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2017 review recommendation: The panel recommends that CAQA (1) revise its mission so that it clearly defines the range of its responsibilities, principles underlying its work and the nature of its interaction with stakeholders; (2) put in place mechanisms for effective forward planning and reviewing progress towards its objectives; and (3) take action, insofar as it is possible within its remit, to ensure that students and employers have their representatives in CAQA governance.

The panel also suggested that CAQA could establish an advisory body involving international experts.

Evidence

The 2017 LoHE established the National Accreditation Body “for the purpose of performing the accreditation tasks, the assessment of quality of higher education institutions and the units therein, evaluation of study programmes and assurance of quality in higher education” (Article 14.) The LoHE further defines the external QA activities of NEAQA as to perform external evaluation of quality of higher education institutions, accreditation and initial accreditation. This is repeated in the February 2018 Government Decision on the establishment of the National Entity for Accreditation and Quality Assurance in Higher Education, and served as the basis for the NEAQA 2019 Strategy which defines NEAQA mission as follows: “NEAQA’s mission is to, in cooperation with the key stakeholders, maintain and enhance the quality of higher education in Serbia in accordance with the international standards and thereby increase its competitiveness.” The Strategy also defines its vision “to become the main driving force for QA development in the Western Balkans and significant partner in EHEA” and values of “independence, accountability, transparency, professionalism, efficiency, cooperation, accessibility and commitment”, while SAR (p. 15) lists as core values “independence, integrity, competence, transparency and openness.”

The basic relationship with stakeholders is defined by LoHE, which established NCHE, the National Council, as the body ensuring the development and enhancement of QA of HE in Serbia, and the Board and CAQA as NEAQA bodies that include stakeholder representatives. In addition to academics as HEI representatives, LoHE also lists Chamber of Commerce representatives as NCHE and the Board members. Students are not defined as members of either body by LoHE, but the Law does prescribe that two students with an average grade of eight or more, appointed by the two student conferences, will be invited to NCHE to “take part in the issues significant for them”. As confirmed during the site visit, the Board members also decided to invite a student representative to participate as an associate member even though this is not expected by the LoHE nor the NEAQA Statute. CAQA, on the other

hand, is defined by LoHE as composed exclusively of academics. While both CAQA and the Board are supposed to be appointed with a view towards gender balance, there are only 2 women in the Board out of 7 members.

In addition to the representation in the NEAQA bodies, stakeholders are involved through surveys (the most recent survey among professional HEIs and NEAQA experts is cited in SAR; see ESG 3.6 on the timing of the surveys) and meetings, as confirmed by HEI representatives during the site visit. The LoHE does not require students or employers to be involved as reviewers, however this is prescribed by the 2019 regulations on standards and procedures which have the legal status of bylaws.

The 2019-2022 Strategy of NEAQA is primarily focused on NEAQA's compliance with the ESG, and its short-term objectives are all devoted to "offsetting shortcomings" on ESG standards, to be implemented according to the Action Plan mostly in 2019 with only few planned for 2020 or later. Regarding ESG 3.1, the Action Plan included workshops with stakeholders aimed towards defining the new mission, development of a plan to monitor its implementation with external experts, and special workshops for newly-involved student and employer reviewers to evaluate and enhance their participation. By the time of the site visit only four common trainings for experts took place. As a public institution, NEAQA is obliged by LoHE to report to Government once a year on its activities and achievement of its objectives.

As noted, NEAQA is in a period of transition, and as CAQA was not legally able to finish procedures or start new ones, it produced a backlog of more than three hundred accreditations NEAQA has had to deal with. By the time of the site visit it managed to complete most, and CAQA members were confident that the backlog would be cleared no later than the 1st half of 2020 if counting on delays connected to the difficulties in involving foreign experts. Five pilot accreditations were completed according to the new procedures at this point, 2 of which in addition to program accreditations also included institutional accreditation. NEAQA does not engage in other types of work, such as consultancies.

Analysis

The Strategy Action Plan provided for workshops for effective forward planning and reviewing progress, however there was no evidence that these took place, and overall the action plan lacked clear, qualitative indicators to monitor progress (see also ESG 3.6). This is not surprising when considering that, as noted, NEAQA is a newly established body, and had to focus on developing and implementing new procedures and preparing for this review. It should also be added that considering the Action Plan provided, the Strategy only refers to the 2019-20 period.

As recommended by the 2017 review, NEAQA has revised its mission statement to put focus on stakeholders, the regulations were amended to include employers and students in review panels, and a student member was included in the work of the Management Board. However, there seems to be some confusion over the goals of NEAQA's work. The 2017 panel identified as CAQA's mission and the sole objective of accreditation procedures "to assure adequate conditions (officially recognised qualifications held by staff, space and facilities) for higher education" (p. 17) and recommended CAQA to focus more on developing quality through the audit procedures. The 2019 SAR emphasises reorientation towards developing the quality culture, and the panel was informed at the site visit that NEAQA wished to make a break from the former CAQA's image of a controller. There is however no evidence that such a change took place. Namely, while changing important aspects of the methodology (as discussed under other standards), NEAQA essentially kept the standards and conditions existing from before its establishment, for both accreditations and audits (as discussed in

more detail under ESG 2.1), thus keeping the national minimal conditions prescribed by LoHE as the key standards in accreditation. Furthermore, no audit procedures have been implemented since 2017. It is thus not possible to confirm that the mission of “enhancing quality in accordance with international standards” is currently translated to the daily work of the agency. The Strategy recognizes that there is room for improvement, noting that in addition to formal participation and occasional surveys, more quality-oriented work needs to be introduced, including smaller workshops. At the same time, several stakeholders at the site visit noted that the purpose of NEAQA was precisely to perform better control than its predecessor which had been overtly lenient. In the view of the panel, it is acceptable that the level of trust in the HE system is such that a modicum of control is needed, and it is possible that HEIs which have proven a certain level of maturity of their internal quality assurance system do not need as much control as those that have just been established. The issue is not that NEAQA should give up all control, but that there is currently a wide gap between the proclaimed target of moving from a control-based to enhancement-based approach, and the reality on the ground.

The Strategy notes that the LoHE should be changed to assure that the governing bodies, notably CAQA, also include employer and student representatives, and that an independent appeals body is established. However, the desired legal changes would still put great emphasis on academic excellence of CAQA members. The proposed changes foresee that the employers could be involved only if they had a scientific master (an advanced postgraduate degree) and only doctoral students would be able to participate. The changes also do not propose that a student or an employer would be a member of the appeals committee. These proposed legal changes were emphasised by the Board members during the site visit, however, the competent Ministry has not given any guarantees that they would be taken into account or implemented. The focus on the (uncertain) legal changes could also be one of the reasons the Board did not focus on the changes they could themselves build in the Statute and the procedures of appointing CAQA members to assure student (and employer) participation.

Students seem to be well aware of the importance of accreditation due to the socially recognised issue of fraudulent degrees and possibly also thanks to the list of accredited programmes CAQA has been publishing for several years now. The student representatives and reviewers are well aware of the power and the importance of their roles. However, students have only recently been involved as stakeholders and they report that there is still little awareness of the role and meaning of quality assurance among their peers. While this may be improved through the growing number of accreditations involving students, this should not be taken for granted. NEAQA would do well to implement its plan to organise more student workshops, and work harder and more effectively in making its work known and recognized. Student organisations have the potential to significantly aid this work through cooperation with their peers from other parts of Europe as well as their involvement in IQA at their HEIs.

Starting from the 2017 review report, it is possible to follow how during the past decade the various groups of stakeholders have been organised and recognized as stakeholders in the Serbian HE QA system – starting with universities and their students, followed by professional HEIs and their students, and finally employers. The Chamber of Commerce, as stated during the site visit, managed to participate in legal changes and include its members in NCHE and the Board. However, the timing of appearance of the stakeholder groups is still reflected in the composition of the NEAQA bodies, and is also connected to the issues of trust in the newly established HEIs mentioned at the beginning. The majority of the Board, NCHE and CAQA academic members come from old public HEIs, and there is no SCAAS representative in the Board. It is true this presents a good approximation of the system (more

than 2/3 of students study at such HEIs), that several stakeholders have mentioned that the status and prestige of such HEIs help support public trust in NEAQA and the whole system, and that there was no complaint of this by the stakeholders during the site visit. Still, the governance of the agency should reflect the diversity of stakeholders and of the HE system and avoid being dominated by a small number of institutions, regardless of their prestige and importance. Rather than lowering the quality standards, this could help in raising the quality of the whole system, and adapting the instruments and procedures to the needs of various institutional profiles. This is especially important in a binary system like Serbian which includes institutions as varied as comprehensive research universities, small universities oriented towards the local labour market, and small private institutions. The robustness of procedures needs to be emphasised as a guarantee of trust, and this could be aided not only by more comprehensive student involvement in both EQA and IQA, but also by much stronger involvement of foreign experts and, indeed, an establishment of an international advisory board. Such a board could be especially helpful in the transfer from quality control to quality culture as its members could not only participate in the discussion of NEAQA internal stakeholders but also provide support to international cooperation in training and developing HEI's internal QA systems.

Panel recommendations

The agency should, in cooperation with the stakeholders, develop a new strategy which would enable the implementation of its mission of enhancing quality of Serbian HE in line with the international standards while keeping a level of control that they find is needed in their system.

Even within the present legal constraints, the agency should strive towards involving all stakeholders, and particularly students, as full members in all of its bodies. The agency should use its international connections to also more actively encourage the participation of international experts in its bodies.

The governance of the agency should reflect the diversity of stakeholders and of the HE system and avoid being dominated by a small number of institutions, regardless of their prestige and importance.

Panel suggestions for further improvement

NEAQA would do well to implement its plan to organise more student workshops, and work harder and more effectively in making its work known and recognized. Student organisations have the potential to significantly aid this work through cooperation with their peers from other parts of Europe as well as their involvement in IQA at their HEIs.

Panel conclusion: substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

The 2017 LoHE establishes NEAQA “for the purpose of performing the accreditation tasks, the assessment of quality of higher education institutions and the units therein, evaluation of study programmes and assurance of quality in higher education” as a legal entity (Article 14) to issue decisions in audits and periodic accreditations, and provide reports as a basis for licensing in initial accreditations. It then establishes the Accreditation Commission (CAQA) as the NEAQA professional body (Article 20) to “conduct the procedure of accreditation of higher education institutions and the

study programmes, as well as the procedure of external evaluation of quality of higher education institutions,” propose review panels (from the list compiled by the National Council) to the NEAQA director, and decide on the outcomes of the accreditation and audit procedures. LoHE stipulates the accreditation and audit procedures as obligatory for awarding Serbian HE qualifications. It does not allow for other bodies to perform these procedures and it does not contain provisions on the possibility of NEAQA operating in other HE systems.

Analysis

NEAQA was formed by LoHE as a legal entity, and CAQA as its professional body, which is a clear improvement to the previous system when CAQA functioned as a body of the National Council which is itself a body of the Government. There is no doubt that NEAQA has clear legal basis for its operations, and the site visit confirmed that the competent Ministry and all other stakeholders support its legal status as the only body responsible for EQA procedures in the country.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

2017 review recommendation: CAQA should be provided with its own bank account to reduce its dependence on the Ministry of Education in administrative terms which has significant impact on CAQA’s planning and management. For the recommendation on the appeals procedure, see ESG 2.7.

Evidence

As already noted and as recommended by the previous review, LoHE turned CAQA into a professional body of NEAQA which is a legal person, self-funded and with its own bank account. The LoHE, the standards adopted by the National Council nor the NEAQA Statute do not explicitly proscribe independence of NEAQA apart from establishing it as an independent legal person. LoHE establishes a clear division and sharing of responsibilities between the National Council, NEAQA and its bodies – CAQA and the Management Board, which can be repeated here, as follows.

- Appointment of both the Management Board and the National Council is done by the Government. Four out of seven of the Management Board members are selected by stakeholders (two by HEI conferences, two by Chamber of Commerce) and three are selected by the Ministry; the Board then decided to also include a student representative even though the documents do not proscribe so. Regarding the National Council, out of its seventeen members, eight are selected by HEI conferences, two by the Chamber of Commerce, and seven by the Ministry, while it is specified that they have to be well-recognized academics or artists. LoHE proscribes that the selection of all of the National Council appointees is based on a public call and lists of all applicants need to be published prior to the selection; in making the selection, the HEI conferences need to take into account the size of the HEIs from which the applicants are coming, to make their selection statistically representative.
- Selection and appointment of the decision-making body, CAQA, is the task of the Management Board, which, as confirmed at the site visit, chooses from the longlist provided by the National Council on the basis of a public call, and can also ask for the longlist to be amended. The Management Board also selects, on the basis of the public call, the NEAQA director, who signs all official decisions, including those on accreditation.

- Selection of experts is done by CAQA, which is able to choose from the list kept by the National Council and suggestions done by the Chamber of Commerce and student conferences.
- LoHE specifies that the National Council, CAQA, Management Board and NEAQA cannot employ or have same people as members, that their staff and members cannot serve as experts; and that neither of them can include people performing political functions.
- The minimal standards set by law are then further developed and combined with the ESG into the procedural standards suggested by CAQA and adopted by the National Council. The NEAQA Statute, passed by the Management Board, further specifies that the standards will be developed by CAQA and adopted by the Board before submission to the Council. At the site visit it was confirmed that the current standards were done in cooperation between CAQA and the National Council, with National Council commenting primarily the clarity of the standards.
- In accreditation and audit procedures, the decisions are suggested by expert panels; on the basis of this, CAQA issues formal decisions which are signed by the Director. The name in Serbian and the status of the formal decisions are aligned with the Administrative Procedures Act, and vary from one procedure to another, however the difference is not substantial. The decisions are submitted to the Ministry which transforms them into final, legally binding decisions.
- CAQA independently selects its president and passes its rules of procedure, which determine the method of decision making – according to the current version, they decide by majority vote on the basis of a suggestion of the sub-commission of its experts for the discipline in which a HEI or a programme is placed. Depending on the discipline, the sub-commissions have two to five members.
- There was some confusion among the agency stakeholders regarding the difference between complaints and appeals; finally, it was established that these are basically defined by the Administrative Procedures Act which proscribes that complaints are submitted to the director during the procedure, and appeals on formal decisions need to be submitted to a second-instance body. LoHE specifies the National Council as the second-instance body for NEAQA decisions which can upon the first appeal, return the decision to NEAQA to repeat the procedure, and upon second appeal, overrule the decision if it deems necessary (more on this under ESG 2.7).

The Management Board adopts the Code of Ethics which applies to all NEAQA staff and experts, and prohibits people currently employed at a HEI or cooperating with a HEI to participate in its accreditation procedures.

Both the SAR and the NEAQA Strategy emphasise independence as the core value to be upheld, and commitment to independence of the outcomes was also emphasised during the site visit by all stakeholders. Additionally, NEAQA has emphasised in the SAR that even though it is satisfied by the provisions of LoHE, it would like to have the ability to adopt its own procedures and solve its own appeals without the involvement of the National Council. At the site visit it was confirmed that even though in practice the National Council limited itself to asking clarifications both during the adoption of procedures and when discussing the appeals, NEAQA is actively proposing that the Ministry changes this legal provision (the Ministry does not have a formal plan to do so at this point).

Analysis

Compared to the analysis in the last ENQA Review Report from 2018 significant steps have been taken to strengthen the independence of NEAQA on all levels, e.g. concerning the organisation, procedures, outcome and finances.

Regarding the organisational independence of NEAQA, while there is no written evidence or oral evidence that challenges on the independence of the agency exist, the panel does agree that there is room for improvement in the legislation and that some clearer structures and regulations would be needed to create mutual trust, transparency and comparability on the European level. What causes concern in the opinion of the panel is, first, the fact that the ministry appoints seven NCHE members and NCHE nominates, through the Management Board, all seventeen members of CAQA. From the perspective of the stakeholders in Serbia the structure described above guarantees that there are checks and balances in the system— especially between the two expert bodies, National Council and CAQA – which prevent any single body from adopting an autocratic approach. However, from the perspective of the panel, such a structure cannot fully assure that no government influence is taken on the work of CAQA and its panels. Financial independence should also be discussed here, as NEAQA is supposed to be fully funded from the fees it charges from HEIs (as discussed in more detail under ESG 3.5), however it is not clear at this point, according to the information from the site visit, if it will be able to sustain itself in this view, or it would be forced to ask for additional funding from the Government.

Furthermore, while the LoHE is focused on preventing anyone involved with politics to participate in the bodies in the system, it assumes that most members will be staff and students of Serbian HEIs, that the majority will come from universities, and even contains provisions that the size of HEIs should be taken into account. Such a system results in the fact that the vast majority of all members of NEAQA bodies come from the largest public universities (for example, 4 out of 8 Board members come from the University of Belgrade). Again, this is seen by the stakeholders as a guarantee of trust, as the largest public universities are widely considered to be the best HEIs in the country, while at the same time there is little trust in smaller and private HEIs. CAQA Rules of Procedure and NEAQA Code of Ethics also prevent experts from evaluating or deciding on HEIs they are connected with, and states that they are personally responsible for the decisions and recommendations they make. However, the panel finds that such a system of proportional representation does allow for undue influence of the largest public universities. It should also be noted that most activities require active participation of the director, who does seem very committed to the work of the agency, but still remains employed as a full-time professor at the University of Belgrade, working for the agency as a contractor. There is no evidence that this has an impact on the agency procedures. Still, such a practice should be changed and adapted to the common international practice in which the director, as the key staff member, is fully employed by the agency, rather than one of the institutions it is in charge of. This is especially important as it is the role of the director to sign all NEAQA decisions, and thus participate in establishing the formal outcomes of its procedures.

A specific area of concern is that in the ENQA review in 2012 as well as in 2017 it was stated that the National Council should not be in charge for establishing CAQA and be the appeal body to CAQA's decisions and that it would be better to establish a separate appeals body. This has not taken place so far, and the appeal procedure continues to differ from the practice of other European agencies and, consequently, damages the independence and integrity of the core body of NEAQA.

Regarding the operational independence, again, it is the National Council that adopts the procedures and compiles the list from which NEAQA chooses academic experts. Again, arguments can be made that this provides for a well-balanced system, with the National Council as a parallel, independent expert body to CAQA. Still, operationally it means that NEAQA always needs to prove the need to

change its standards and methods to the Council, and that it cannot choose experts ad-hoc, which could limit its potential to engage more foreign experts.

All of the above reflects on the independence of formal outcomes, and in this regard it is especially worrying that the appeals procedure enables the National Council to ultimately overrule NEAQA's decision.

In conclusion, it does seem that members of the Management Board as well as CAQA are devoted to their role of building up the new agency NEAQA. Nevertheless, especially the independence of these two core bodies of the agency, as well as the director, needs to be supported. On one hand it would be beneficial not only to have a public call for the application of the members of CAQA but to develop selection criteria for them which are published in advance. For both bodies it is also true that the few largest HEIs are more actively involved in the agency than others. But for the future success of the accreditation system and its acceptance it will be crucial that the diversity of the Serbian system is also represented in the agency. It has to be an ongoing effort of NEAQA to strengthen the independence of the agency vis-à-vis the different stakeholders, namely the government and the major HEIs.

Panel recommendations

In addition to involving more experts from outside the system (see ESG 3.1), the independence of the agency from HEIs as well as the government can be strengthened by the following steps, which need to be taken in cooperation with all stakeholders in the system.

(1) To uphold the operational independence of the agency, define the criteria for membership in the bodies of the system which would focus on a balance of personal experiences and motivation, in addition to the proportional representation of the system and formal criteria defined by LoHE.

(2) To uphold the organisational independence of the agency as well as the independence of formal outcomes, ensure that the Director is a full-time position with no contractual obligations towards HEIs within the system.

(3) To uphold the organisational independence of the agency as well as the independence of formal outcomes, a clearer appeals procedure should be defined (see ESG 2.7).

Panel conclusion: Substantially compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

2017 review recommendation: CAQA should produce regularly thematic analyses focusing on quality and internal quality assurance, in addition to those already available and planned which address quantitative aspects.

Evidence

While CAQA produced a number of thematic analyses which were considered in the 2017 review, NEAQA has not had the time to produce any, as also acknowledged in the SAR (p.30) and during the site visit. This reflects back to the timing of the review and the fact that few procedures have been implemented by NEAQA. The Strategy foresees the establishment of a special Research Department that would produce them, and the attached Action Plan contains a "strategic area" devoted to the

production of thematic analyses. The objectives within include “creating a plan for thematic analyses” and “analysing the procedures and the decision-making,” to be done by the end of 2019. In addition to the meta-analyses of NEAQA’s work, it can be concluded from the Strategy that the topics of interest will be IQA, quality culture and excellence in HE. The stakeholders at the site visit did not mention more specific plans to produce analyses, but did mention that they plan to do quantitative analyses of e.g. outcomes per fields. Upon the request of the panel during the site visit, NEAQA submitted a short list of the analyses it plans to produce.

It was also noted during the site visit that the agency plans to establish a specific department to deal with projects and research; these functions should serve self-reflection in conducting evaluation procedures.

Analysis

The 2017 panel was satisfied with the number of thematic analyses CAQA was publishing, however, they recommended that they focus more on the qualitative aspects and emphasise good practices and areas of improvement at the evaluated HEIs. The discussions at the 2019 site visit left this panel with the impression that the stakeholders do not see the full potential of thematic analyses. While there is no doubt that the agency plans to produce them, as also shown by the table above and indicated in the Strategy, the plans remain vague and there are no guarantees that the 2017 recommendation will be implemented.

It should be emphasised that in addition to helping the agency and other stakeholders to adopt a more reflexive attitude regarding accreditation and QA and the potential and complexities of those activities, the thematic analyses could also have the potential to fight the often-mentioned complacency in the HE system by encouraging self-reflection and promoting innovations. By identifying trends and promoting good and innovative practices in areas such as pedagogical innovation, teaching and assessment practices, attention to employability, curriculum patterns and changes, etc.; rather than focusing on compliance and excellence, they could spread good practices throughout the system and thus help develop the quality culture.

Panel recommendations

The panel recommends NEAQA not only to start regularly producing thematic analyses, but to use them as a tool for self-reflection (see ESG 3.6) and as a tool to promote good and innovative practices that can be spread throughout system.

Panel suggestions for further improvement

It would also be helpful to reflect what kind of information is needed by the HE system, and which information can be provided on a solid basis by an agency. Once the concept of thematic analyses is developed, a project plan should be put in place on how to put it in practice. For this it is not crucial to establish a specific department, but rather clearly and transparently establish responsibilities for producing thematic analyses within the existing structure.

Panel conclusion: partially compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2017 review recommendation: CAQA should enhance its resources planning and management to ensure that it makes best possible use of the resources available. See also the related recommendation about a bank account under ESG 3.3.

Evidence

Due to the fact that NEAQA was reorganized in 2018 the resources, finances and staff changed compared to the previous review. The agency now has a separate bank account, and the Managing Board adopts the annual programme of work and the financial plan upon the consent of the Government. The panel was able to check the Financial Report for the period between July 2018 and December 2018 and the Financial Plan for 2019. Major expenses refer to the allowances for the Board and CAQA members as well as expert fees, implementation of the IT infrastructure and the development of a new IT system, which was also emphasised in the Strategy and by stakeholders during the site visit. As the system is still under development, the panel was not able to study it – but its main purpose seems to be to enable electronic submission of the detailed information and tables used in accreditations. The offices of NEAQA are now in another building, but still provided by the Government without costs.

NEAQA is financed from the income generated by fees for accreditation and audit charged from the HEIs. Because the fee for programme accreditation was raised, there were complaints from large public universities which normally have a large number of programmes, and this was a topic at the site visit. The Ministry provided seed funding last year, but does not have plans to provide further funding. Instead, NEAQA plans to use internationally-funded projects to supplement what it earns from fees. At the site visit, the crucial stakeholders agreed that currently there are only short-time plans and that there can be no certainty that NEAQA would be able to break even if relying solely on funding from fees, as there is still little information on the full costs of its work.

NEAQA managed to take over some of the staff members from CAQA which can transfer some experiences with the old system, and to gain new, competent staff members with an international background. It now relies on nine full-time staff, seven of which work full-time with evaluations directly, while the other 2 provide technical support. The agency also hires external support for finances and IT. There are plans in place to acquire additional offices in the building and thus create conditions to employ more staff – the management mentioned the possibility of employing up to five more people.

Analysis

The agency managed to become financially independent from MoESTD and there seems to be no reason for concern in the starting phase of the new agency, as the resources seem to be sufficient for the procedures which took place in 2018/19. However, the real costs of the new procedures have not been established yet, as only 5 were completed by the time of the site visit. Additionally, it was mentioned at the site visit that because the price of programme accreditation was increased, HEIs might be trying to combine several programmes into one programme with modules to decrease accreditation costs. Thus the long-term financial sustainability will be an issue for the management of NEAQA and it is one of their core tasks to develop a more predictable financial model which allows long-term-planning. Moreover, priorities have to be set in spending the finances on priorities which are in line with the Strategy. While the panel understands that both financial planning and reporting are done in line with the regulations, in the future it would probably be useful to develop more detailed plans and reports which would enable both the agency and the public to understand full costs of each type of the procedure, to differentiate between fees to various bodies, experts and staff, etc.

This is of special relevance as the agency would probably do well to streamline the fees it charges from HEIs by, namely by making visits more efficient (e.g., with clusters of programs in the same field).

It is crucial for the success of an agency to have a sufficient number of qualified staff. The number of staff was sufficient for the limited number of procedures and those the panel met were motivated and committed. Considering that the number of site visits will increase significantly in 2020, the need for more staff members with experiences in internal and external QA is obvious. Additional staff would enable NEAQA to implement a number of necessary activities, for example: offer more trainings for experts on external QA and for HEIs on internal and external QA; develop projects and thematic analyses; devote more time to reflection on the existing procedures, etc., which would all be beneficial for the whole accreditation system in Serbia.

Additionally, while the staff seem very enthusiastic, the system cannot run on enthusiasm for a long time, and long-term methods of keeping staff motivated and qualified need to be considered. In this regard, one of the core tasks of NEAQA should be to develop a concept for staff development and to allow them to take part in trainings which are relevant for QA agency staff on national and international level, including trainings and international exchange on QA methods as well as generic skills (e.g. communication trainings, project management). Regarding this, it has to be emphasised that these are of equal relevance for existing as for new staff members. Funds for staff development have to be provided in the next years to assure that there is a continuous process of upgrading staff competences. It is possible that this would require additional state funding.

Panel commendations

The panel wishes to commend the agency for hiring enthusiastic and competent staff.

Panel recommendations

The agency should establish full costs of the procedures, in order to streamline them if possible and thus reduce the overall costs to HEIs, but also to establish long-term financial plans which would enable it to acquire timely additional support from the state budget if necessary.

The agency should establish a human resources development plan which would provide not only the criteria and plans for employing new staff, but also training and development activities for both existing and new staff.

Panel suggestions for further improvement

Strengthen the international exchange of staff.

Panel conclusion: substantially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

2017 review recommendation: CAQA should (1) devise an action plan for the development of its internal quality system; and (2) put in place formal mechanisms for gathering external feedback after each accreditation review and audit and internal feedback on a regular basis, and for following up on internal and external feedback collected.

Evidence

The Code of Ethics defines rules of conduct, and cases considered, and sanctions for, a breach of the Code. It also provides for the establishment of an ad-hoc Ethics Committee to deal with a breach. It explicitly prevents nepotism, undisclosed financial gain from participating in the procedures, and defines evaluating or deciding on an evaluation of a HEI one is currently working with as a conflict of interest.

According to the SAR, the previous CAQA has collected external feedback through surveys among HEIs (2011, 2015 and 2017), students (2011 and 2015) and academic experts (2017) and NEAQA plans to continue with this practice. Feedback on new procedures was collected from HEIs and reviewers participating at workshops and the analysis of the response was included in the SAR. Questionnaires were made for the purpose of collecting the opinions of stakeholders regarding the changes of regulations and efficiency of NEAQA, and a version of the questionnaire to be used in the future was shown to the panel. The questionnaire focuses on the panels' and the HEI's satisfaction with the changes in the procedure, and the version for panel members has additional items for evaluating the work of the other panel members. However, according to the information from the site visit this questionnaire was not sent to the HEIs nor the panels participating in the panel procedures, and there is no evidence that the agency will use this systematically as a regular practice in the future.

The SAR also includes a SWOT analysis, and the Strategy provides further self-reflection of the agency. The SAR (p. 32) states that throughout the pilot projects the members of panels were asked to give their opinions and comments regarding the new procedure, with insights of labour-market representatives considered particularly important as they were the last group to be included in the procedures. The panel established that this was done informally, between the site visit meetings and according to some reports, even during the site visit meetings of the panel and HEI representatives. One of NEAQA's actions planned to be conducted in the near future is the implementation of ISO standards: 9000, 20000 and 27000 in order to improve the quality of its activities and define principles underlying its work based on the PDCA cycle.

Analysis

Even though this was a 2017 recommendation, and even though we were told that there were plans to do so, the panel did not find sufficient evidence that the agency will regularly and systematically collect feedback on its procedures, i.e. send online questionnaires to both experts and HEIs once the procedure takes place. Even for the pilot procedures, the very purpose of which should be to test an approach in order to improve it, the feedback was collected only informally and during the site visits. Collecting feedback from everyone involved after implementing a procedure is an important segment of what should become a structured system of collection regular feedback in which it is important to combine different tools and use triangulation. At the moment there is a lack of systematic collection and analysis of feedback provided from these various participants in the process, and the majority of feedback is collected informally.

A QA agency should be a learning organization, benefiting from the experience and insights from the various stakeholders, namely staff, reviewers and institutions. While an informal IQA system can be expected in young, small institutions, and while some input will always be coming through informal channels of communication, NEAQA might already be too large an organisation to collect feedback only in this manner. In addition to regularly sending out questionnaires and analysing the qualitative information they provide, the agency should triangulate by e.g. creating opportunities for ex-post evaluation discussions about its processes and how to improve them, such as internal commissions, especially given that it is in its initial steps and performing pilot reviews that are supposed to be evaluated and help to improve and adjust subsequent reviews. Emphasis should always be put on content and self-reflection, instead of e.g. grading the experience and producing charts. As this is a crucial aspect of the quality culture, and again as already noted by the 2017 panel, NEAQA would do

well to give an example of promoting critical discussions and in this way turning informal practices of collecting feedback into a formal method of improvement. The information collected in this way should be communicated to the public in an appropriate form (e.g. aggregated results), together with the steps the NEAQA plans to take on the basis of the feedback. Such information can also be used as a basis for a thematic analysis. Communication to the public of this form is especially important in the current situation marked with a low level of public trust in the educational system.

While it is of course necessary to adopt the PDCA cycle and introduce regular feedback collection and self-reflection, it might be questioned if full ISO certification would be beneficial considering the currently available human and financial resources. The process orientation of ISO is beneficial for the management of an agency but the effort necessary to introduce ISO in such a small organisation is high and NEAQA is in the panel's view lacking staff to implement it. This might be an appropriate tool for a more mature organisation. There is a number of methods the agency can use to assure its own quality that are formal and structured, but not as resource-intensive like ISO certification, as noted.

Panel recommendations

NEAQA should introduce formal mechanisms for collecting feedback from experts and institutions after each procedure, collect more qualitative additional feedback, e.g. through focus groups, interviews etc. to reflect on the procedures, especially the pilot procedures and establish similar mechanisms to regularly collect feedback from internal stakeholders – staff and CAQA members. The feedback should be collected and analysed in a manner that enables the stakeholders to comment on what they find relevant, and that can be used by NEAQA to continuously improve its work and the framework in which it operates, and report this to the public.

Panel suggestions for further improvement

The agency can introduce annual workshops with staff (and possibly also separate workshops with CAQA and the Board) to give them the opportunity to reflect on its work and plan future steps.

Panel conclusion: partially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

Even though the regulations do not specifically require NEAQA to undergo external reviews, this is the agency's third ENQA-coordinated review. The stakeholders at the site visit discussed ENQA membership and EQAR listing as important for the whole HE system and a basis of trust in the system.

Analysis

The panel confirms the commitment of the whole system to support further evaluations of the agency against ESG as an important aspect of belonging to the European Higher Education Area.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2017 review recommendation: CAQA should (1) amend slightly its audit standards so that they embrace all aspects of ESG 1.1, 1.3, 1.4 and 1.7, and have a discussion with academic experts, students and employers participating in processes to arrive at a common understanding of how student-centred learning and recognition should be addressed; (2) refocus audits more towards the effectiveness of internal quality assurance; and (3) provide greater support for HEIs to take the primary responsibility for quality.

Evidence

Minimal standards for accreditation are set by LoHE: the number and type of programs necessary to become a certain type of HEI; that at least 70% of classes need to be taught by full professors at academic programs (50% for arts programmes), and at least 50% by people with PhDs at professional programs; that a HEI needs to employ at least 20 full-time professors; division of ECTS for each type of programme; HEI governance; necessary resources, etc. These are then further developed by the National Council, in cooperation with CAQA, and listed in regulations (separate regulations exist for institutional and programme accreditation, for initial accreditation of both, for audit and for HEI self-evaluation that precedes the audit) and then further detailed in lists of standards, published for each type of procedure on the NEAQA website.

In the discussion of this ESG standard, SAR briefly repeated the analysis of the 2017 panel and included the table on the relation of standards to the ESG Part 1 from the 2017 panel report (slightly adapted to changes in the numbering of standards), copied below.

Table 4: analysis of ESG part 1 and NEAQA standards (source: 2017 CAQA review report, with adaptations)

Process	Initial HEI accreditation and programmes	Periodic HEI accreditation	Initial and periodic programme accreditation*	Self-evaluation as a basis for audit
ESG 1.1 Policy for QA	Standards 1 (HEI's objectives and tasks); 12 (IQA mechanisms)	Standards 1 (Goals and objectives); 11 (IQA mechanisms)	Standard 11 (Quality control)	Standards 1 (QA strategy); 3 (QA system); Standard 2 (QA standards and procedures) and 8 (with regard to discrimination)
ESG 1.2 Design and approval of programmes	Standards 3 (Programmes/Studies); 4 (Research)	Standards 4 (Programmes/Studies); 5 (Research)	Standards 1 (programme structure); 5 (curriculum); 6 (quality, modernity and international compatibility); 15 (distance learning)	Standards 4 (quality of programmes); 6 (quality of research/artistic/professional activities); Standard 3 with regard to student involvement in programme design.
ESG 1.3 SCL, teaching and assessment	Standards 3 (programme/studies); 8 (students)	Standards 4 (programme/studies); 8 (students)	Standards 4 (Graduate competences); 5 (curriculum); 8 (student assessment and progression)	Standards 4 (quality of programmes); 5 (quality of the teaching process); 8 (quality of students)

ESG 1.4 Student admission, progression, recognition and certification	Standard 8 (students)	Standard 8 (students)	Standards 7 (student admission); 8 (student assessment and progression)	Standard 8 (quality of students)
ESG 1.5 Teaching staff	Standards 4 (research); 5 (quality of teaching staff); 6 (requirements for teaching staff)	Standards 5 (research and artistic activities); 6 (teaching staff)	Standard 9 (teaching staff)	Standards 6 (Quality of research/artistic/professional activities); 7 (Quality of teaching staff)
ESG 1.6 Learning resources and student support	Standards 7 (Non-teaching staff); 9 (Facilities); 10 (Library, resources and IT); 11 (Funding);	Standards 7 (Non-teaching staff); 9 (Facilities); 10 (Library, resources and IT); 12 (Funding sources);	Standard 10 (organizational and material resources)	Standards 9 (Quality of library resources and IT facilities); 10 (Quality of HEI management and non-teaching support); 11 (Quality of facilities); 12 (funding)
ESG 1.7 Information management	Standard 2 (Organization of HEI)	Standards 2 (Planning & monitoring); 3 (organization & administration)	Standard 11 (Quality control)	Standards 3 (QA system); 10 (Quality of HEI management and non-teaching support); Standards 1 (QA strategy); 2 (QA standards and procedures) and Standard 14 (Systematic surveillance and periodic quality control)
ESG 1.8 Public information	Available after positive decision. NEAQA plans to publish short summaries of CAQA 2018 decision on the website in the future.	Standard 13 (Transparency)	2 (Programme purpose); Standard 9 (Teaching staff); 12 (Transparency: 3 rd cycle programmes)	Standards 1 (QA strategy); 2 (QA standards and procedures); 4 (Quality of programmes); 7 (Quality of teaching staff); Standard 5 (Quality of the teaching processes)
ESG 1.9 On-going monitoring and period review of programmes	Standard 12 (IQA mechanisms)	Standard 11 (IQA mechanisms); Standards 4 (Programmes/Studies) and 5 (Research and artistic activities)	Standard 11 (Quality control)	Standards 1 (QA strategy); 2 (QA standards and procedures); 3 (QA system); Standards 4 (quality of programmes); 5 (quality of the teaching process); 13 (role of the students in self-assessment)
ESG 1.10 Cyclical external quality assurance	Periodic accreditation after one year required by LoHE	Required by LoHE on every seven years	Required by LoHE on every seven years	Required by LoHE on every three years

A comparison between the NEAQA standards and CAQA 2017 standards which preceded them with the standards evaluated in the 2017 report, reveals only minor changes were made, and that the standards have remained fundamentally unchanged since 2006 (when, according to the 2017 report, p. 28, they were first created). Thus, NEAQA still has separate standards for initial and periodic institutional accreditation, accreditation of first and second cycle programs, accreditation of third cycle programs in arts and in other disciplines, audit and self-evaluation of HEIs. 'Audit standards' are actually rules of procedure and instructions to the panel on how to consider self-evaluation standards during audit (and thus not included in the table above).

The institutional accreditation standards focus on minimal conditions to perform studies, primarily resources (teachers, support staff, space, laboratories, library) and the content and existence of various governance mechanisms and documents required by LoHE. The standards in initial institutional accreditation are similar, but with lower requirements in terms of numbers. NEAQA staff

noted at the site visit that they have tried to improve them by focusing on more qualitative aspects – e.g., checking teacher’s CVs in the context of the teaching they do rather than just counting them. In comparison to the CAQA 2017 standards, the current standards contain additional criteria in the chapter on students related to the social dimension, primarily the inclusion of students with disabilities and from minority groups. The standards for first and second cycle programmes do not differ much from those for the third cycle, nor there are significant varieties for different types of third cycle programmes. They all look at the resources available to the program in addition to its content. Changes from 2017 include the addition of the criteria for: ‘interdisciplinary, multidisciplinary and transdisciplinary programs’ (to the list of separate criteria for every research area and arts); joint programmes; programmes in foreign languages; programmes leading to regulated professions in health; and resources and adaptations for students with disabilities. Audit standards were changed so that they no longer require the panel to evaluate space and equipment, non-teaching staff, governance and information to the public, which are still covered both by self-evaluation and accreditation criteria. As a supplement to standards, NEAQA publishes tables that HEIs need to fill in and guidelines for submitting SARs and panel reports. These ask for very comprehensive evidence, including administrative documents such as employment records, property documentation etc.

SAR (p. 35) states that it plans to implement the 2017 recommendations and the Strategy includes plans to revise the standards in cooperation with stakeholders, as recommended by the 2017 panel, at the end of 2019 and 2020. It also states that, as expected by the 2017 report, audit will become more frequent and thus the focus will be on developing quality culture instead of control, and that trainings and other developmental steps will take place. However, no audit procedures have been implemented since 2017, as the third cycle of accreditations has just started and audits are meant to be implemented mid-cycle; the same is true of the planned analyses and trainings.

As already noted above, during the site visit the panel discussed the manner in which the standards take into account issues of teaching and learning such as retention and SCL; most stakeholders did not consider these issues to be crucial in quality assurance. Only few HEI representatives and members of NEAQA management noted that QA should increasingly start focusing on student outcomes, progression, and teaching and learning.

Analysis

IQA at Serbian HEIs was primarily described at the site visit as a data-collecting exercise done once a year or once in two years. This is done by ad-hoc committees and groups, and only starting from this year HEIs would be able to employ specialised administrative staff to deal with QA. The difference between ‘low’ and ‘high’ quality HEIs in the system, it follows from on-site discussions, is in the level of compliance to the legal standards, e.g. number of teachers, publications etc.

As can be seen from the table 4, it is possible to establish that all ESG Part 1 standards are ‘covered’ by various NEAQA criteria. The 2017 panel conclusion (p. 31) that self-evaluation (audit) standards cover the ESG Part 1 comprehensively, while the programme and HEI standards focus solely on details (e.g. regarding student-centred learning, the focus is on assessment), thus still stands. It follows from the 2017 report that already in 2012 the panel recommended CAQA to focus on quality culture and enhancement rather than controlling the minimal legal conditions, and thus enable HEIs to demonstrate their improvements and the way in which they implement the first part of the ESG. The same thing was again recommended in 2017, and this goal was supported by the SAR and the site visit. However, discussions with stakeholders have shown that there is little understanding in the system overall of what this would mean. Even though already the third cycle of checking the compliance with minimal conditions is under way, there is no trust in the system that these have been met by all HEIs.

At the site visit, several stakeholders mentioned that a number of HEIs are run as for-profit businesses or even diploma mills. They listed various examples of cheating and playing the system such HEIs would recur to. Accordingly, it was noted that the increased fee for initial accreditation is meant to deter new attempts at establishing such HEIs. Most stakeholders seemed to agree that the way to solve these issues is to perform even more stringent controls and introduce novel control tools such as surprise visits to HEIs, within the limits posed by the institutional independence and the administrative law. Even though the HEIs complain that they have to submit very comprehensive administrative evidence to prove things such as owning their property, actually employing their teachers etc., they consider this necessary. The tables and guidelines attached to the standards further illustrate the low level of trust in the system. To give one example, the guidelines require that the number of students is calculated as the number of students admitted to the first-year times the number of years in the program – not even trying to ask for the HEI's own records and the actual number of students. An understanding prevails among the stakeholders that any flexibility in the interpretation of standards and the method of application would lead to overall lowering of standards; and that focus on enhancement and support would mean that HEIs would no longer be required to meet minimal, quantitative requirements. At the same time, even though the standards seem demanding at the first glance, closer scrutiny reveals that most include exceptions. Additionally, in the old system, if these were not met the HEI normally got an opportunity to meet them in a period of time. The stakeholders at the site visit mentioned a number of times that this would no longer be the case and that NEAQA would remove the shady providers from the system which its predecessor did not. However, its predecessor had also been praised as the institution that purged the system, and there is still too little evidence to comment on this further.

The strategic documents of the agency emphasise the responsibility of the HEI for the quality assurance of teaching and learning which is in line with the ESG philosophy. However, in practice it seems that it is up to the agency to prove that a HEI is not compliant with the standards, rather than giving the HEI an opportunity to show that it is. The system thus still manoeuvres between quality control as its original starting point and the aim in the view of most stakeholders, and an enhancement-oriented approach as the philosophy behind the ESG. Due to problems in the HE system in Serbia both approaches are reasonable, and, in the view of the panel, these are not conflicting approaches. The panel acknowledges that quality control is needed up to a certain extent, however, the panel finds that a system that focusses solely on the analysis of inputs and resources does not seem likely to achieve the stated objective of quality development. HEIs have obviously found ways to demonstrate compliance, and always checking and re-checking the same numbers and documents will not produce novel results. Instead, the focus should be on the robustness of both internal and external QA procedures, the effectiveness of HEI's IQA, and the outcomes reached by students. NEAQA needs to define in which areas quality control is needed and integrate these aspects into an approach which targets quality enhancement. It will be one of the core tasks of the agency to start requiring HEIs to demonstrate their own improvement according to their own aims, and reflect on their needs and objectives in cooperation with stakeholders, rather than simply filling in pre-defined tables. The panel understands that such a reorientation would demand a cultural change and a gradual learning process among all stakeholders. The detailed 2017 panel's recommendations to include various aspects of the ESG in the standards, such as recognition procedures or student-centred learning, could have easily been implemented even in the existing model through simple addition of criteria, but were not. Of course, this can be explained by the short period the agency had to implement the numerous procedural and organisational changes, as noted in the introduction. However, considering that the reorientation was first recommended in 2012, and that both the 2017 and 2019 SAR state that this would be done without providing any concrete steps, it is also possible

to argue that the agency has so far failed to take any steps to change this. At the same time, the conditions have changed, the agency is now independent and has competent full-time staff, and thus prerequisites exist for the change to take place, and the Strategy indicates that steps will be taken in the direction recommended by the panel.

Panel recommendations:

NEAQA internal stakeholders need to reflect on the 2017 recommendations and start a broad discussion with all stakeholders on how to implement them and start the reorientation of the whole system towards the development of the quality culture which presupposes institutional responsibility for implementing the first part of the ESG in its entirety, rather than a more lenient system of external control.

Panel suggestions for further improvement:

In addition to the recommended changes in the content of the criteria and standards, NEAQA can start experimenting with a less control-oriented approach by making several standards broader, removing the requirement to comment detailed criteria and fill in tables, and leaving just broad questions HEIs can respond to as they see fit and in line with their own internal practices. This is one way in which the agency can move the onus of proof to the HEIs, and enable them to demonstrate improvement as they see fit even without changing the law or fully revamping the standards.

Panel conclusion: partially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2017 review recommendation: CAQA should (1) devise, in cooperation with the national authorities, arrangements where its members do not combine the role of a body taking decisions with the role of key external experts, and where they focus on the former role in line with the spirit of the ESG; (2) place a stronger emphasis on quality improvement in its processes; and (3) amend its internal regulations to ensure full clarity and consistency. For a related recommendation about expert involvement, see ESG 2.4.

Evidence

The SAR repeats the finding of the 2017 report that the LoHE defines the purpose of accreditation as checking compliance with minimum standards and conditions laid down in LoHE (types and minimum number of programmes for the individual types of HEIs; number, qualifications, mode of employment and workload for teachers, etc.) while audits are intended to assess whether HEIs comply with their QA obligations, and are geared towards quality enhancement (p. 31). However, the wording of the 2017 LoHE (which was not considered by the 2017 panel as it was adopted mid-evaluation) is different and states that both procedures are aimed towards checking compliance. Furthermore, the term 'audit' is never used and the literal translation of the Serbian term would be 'external control/evaluation of HEI quality.' However, while the law envisages both procedures to be aimed towards quality control, in practice they also include enhancement-oriented elements. Both require

the HEI to have a functional IQA system, for example, and to regularly improve the quality of their programmes.

The difference in the aims of the two types of procedures is however visible from the standards themselves, which look at the same areas but take a different approach, as noted under ESG 2.1. While accreditation standards focus on the existing state of affairs, such as documents and resources available, in relation to pre-determined minimal conditions which are often quantitative, audits take a developmental, process-oriented approach. To give an example, in accreditation the criteria ask if the HEI's teachers have no more than 12 classes per week, that no less than 70% of all classes are taught by teachers employed by the HEI, and that at least 50% of teachers have doctoral degrees. In audit, the criteria refer to institutional HR policies and the ways in which it monitors the quality of teachers' work. No audits have been implemented since 2017, when the first cycle of audits was completed. Thus no audit reports or SARs according to the new audit procedure were available to the panel as evidence, and the SARs and reports from the pilot accreditations were available only in Serbian.

The key change in the procedures implemented by the new LoHE and new procedures was to solve the systemic issue commented on by the 2017 panel and introduce independent expert panels, leaving CAQA only the decision-making. The regulations for all of NEAQA's procedures now, without variation, prescribe that a five-member panel is formed. In all procedures the panel is composed by three academics from the list kept by the National Council, one student nominated by one of the two student conferences, and one representative of the labour market nominated by the Chamber of Commerce. Site visits have been introduced to all procedures, as well as the practice of publishing all the reports and follow-up documents (even though the publication of the reports on the NEAQA website only took place during the site visit, and SAR expected only report summaries to be published). The procedures are analysed in detail under ESG 2.3.

The stakeholders were involved in the development of the new standards and procedures through their representatives in NEAQA bodies and the National Council, which adopted the standards in 2019. However, apart from ad-hoc surveys and thematic analyses done by the previous CAQA, and the activities related to the 2017 ENQA evaluation, there was no systematic stakeholder feedback to work with. As discussed under ESG 2.1, the changes to the standards were in any case minimal. And also as discussed under 2.1, both in the SAR and during the site visit NEAQA internal stakeholders emphasised the need to focus on quality culture rather than quality control, however the external stakeholders emphasised the need to better implement quality control.

The system requires HEIs to undergo some type of external evaluation preceded by a SAR every 4 years, with follow-ups and possibly also additional program accreditations; in addition to all this, the Ministry can always request a site visit or check in cases of concerns. The panel was of the impression that the burden on the HEIs is very high, and discussed this during the site visit. HEIs considered this to be unavoidable and expressed their satisfaction with the system, especially with the new procedure with an independent panel. The only complaints regarded the increased price of periodic program accreditations and the need to submit comprehensive documentation as evidence.

Similarly, the panel found the criteria and the supporting documents confusing and not very user-friendly, and, just like the 2017 panel, required explanations on when the programme accreditation takes place as separate from the institutional accreditation. It was explained at the site visit that this happens when a programme was initially accredited mid-cycle, and thus its periodic accreditation cannot fit the schedule of other accreditations done at the institutions. However, the stakeholders expressed satisfaction with the standards and their clarity.

Regarding the possibility to implement the European Approach to QA of Joint Programmes, LoHE does not explicitly allow or forbid it. NEAQA has no procedural documents to implement it at this time, but the staff have informed the panel at the site visit that there is a joint programme in Serbia accredited according to the European Approach by a foreign EQAR-registered agency. NEAQA staff have commented that they planned to develop a procedure through which the decision made by the foreign agency would be accepted, thus also enabling NEAQA to adopt other decisions made by other agencies on the basis of the European Approach. However, at the time of the site visit no formal plans have been adopted to do so.

Analysis

This standard presents significant challenges for many agencies and this one is no exception to that, especially given the diversity of institutions it faces. On the one hand, the agency aims to ensure that all programs and institutions fulfil certain minimum standards and that implies applying similar standards to all of them. On the other hand, this may hinder the diversity in the system and leave all programs and institutions to conform to the same standards, regardless of their profile, mission, and specificities. The agency has tried to accommodate some diversity, especially regarding some specificities in the types of programs (University vs Applied Sciences; Artistic vs. Scientific). Nonetheless, it should devote more careful attention to this, namely regarding the way the standards are applied and to what extent its panels are not too homogeneous and too much influenced by certain institutional profiles and values. Moreover, certain types of institutions, notably the privately-owned, may require an attention to aspects of ownership and governance, which may be specific and relevant to an adequate understanding of their decision-making process and actual engagement with QA.

Even though only a few stakeholders emphasised this, the panel believes that the agency should take into account the financial strain put on institutions by fees of the high number of evaluation procedures. Currently existing system will require significant financial resources from HEIs and this was confirmed in the meetings with representatives of HEI conferences. This system does create a lot of workload and institutions would benefit from integration of the different activities. The panel is especially concerned that the number of procedures could lead to evaluation fatigue, and thus a superficial approach to evaluations which is already a risk in the system. At the same time, the panel understands that a number of stakeholders find such an involved approach necessary in this incipient phase of internal quality assurance systems, but again in the future the system can be adapted in a way in which not all HEIs need to demonstrate compliance and progress according to the same standardised schedule, but this can be made dependent on the robustness of their internal quality assurance procedures. And as NEAQA is well aware, this is not necessarily a proxy of HEIs ranking or history.

Regarding the design of the procedures, while discussed under ESG 2.3, there is no doubt that in this regard the 2017 recommendation was taken into account and implemented. NEAQA has implemented major changes compared to the old accreditation procedure. The core process: SAR by HEI, site visit by an independent panel of experts (including a labour market representative and a student), decision by an independent body of the agency (CAQA) and follow-up is now in line with the ESG. There are some national specifics, e.g. that the preliminary report, drafted by the panel of experts, is written before the site visit takes place or that the panel is nominated by the director of the agency. CAQA takes a yes or no decision and gives no conditions but can give recommendations in all procedures, which is again a change from the previous system. Only in the old procedures which NEAQA is now completing conditions can be given through an 'opinion' which can be given for a period of up to 6 months, and is then followed by a decision based on the improvement demonstrated.

However, the standards are very detailed and lead to very specific recommendations which leave little room for independent institutional action, as they are told e.g. to add or remove a specific course with a specific number of ECTS, etc. One consequence of the focus on the compliance with detailed criteria is the seeming equalisation of all of them. To give an example, in an opinion that was made available to the panel in English, an institution was given 30 days to correct deficiencies. A number of deficiencies referred to failure to submit documents such as copies of teachers' degrees, journal articles and rent contracts. A few however are substantial: the same program is sometimes referred to as 'professional' and sometimes as 'academic', and a clarification is necessary; it is unclear why the institution has two programs in the same field, at the same level and similarly titled; the institutions has not defined its goals or mission; the allocation of ECTS varies between documents; there is no assessment criteria for the students in most courses; students are not included in the IQA system. It is the opinion of the panel that placing all of these on the same list of deficiencies to be corrected within 30 days encourages HEIs to make superficial changes to the documentation, rather than going through a real process of change and development. HEIs are not given a real chance to demonstrate improvement in such a system. However, this opinion was issued in the 'old' procedure. In the new procedures, only summaries of reports were available in English and the whole reports in Serbian only. As far as this is sufficient evidence, the recommendations were mostly more general, and it remains to be seen how these will be taken up by HEIs and how their fulfilment will be assessed in future procedures.

Regarding the last recommendation of the 2017 panel, to improve the clarity of the documents, the discrepancy of the panel's impression and that of the stakeholders is obvious. Namely, this panel also found the documents confusing and took some time to understand which document refers to which procedures, and to understand their content and mutual differences and similarities. This is most likely due to the fact that all stakeholders are used to the standards as they have not been changed much for more than a decade. More on clarity of the procedures under 2.3.

Panel recommendations:

The agency should consider the ways to adapt its procedures to different types of institutions it evaluates and their varying contexts.

In addition to and while implementing the recommendations under ESG 2.1, 3.4 and 3.6 which are all also relevant for this standard, NEAQA should establish, in collecting feedback from the HEIs, which issues are strategic and require long-term institutional action, as opposed to details which can be corrected quickly. This should be emphasised in guidelines to panels and taken into account by CAQA when giving recommendations, to avoid an overtly prescriptive approach and enable change and development.

Panel suggestions for further improvement

The agency could actively monitor the workload it puts on HEIs through external evaluations and follow-up procedures and be prepared to adjust the methodology to ease up the burden if needed.

Panel conclusion: partially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

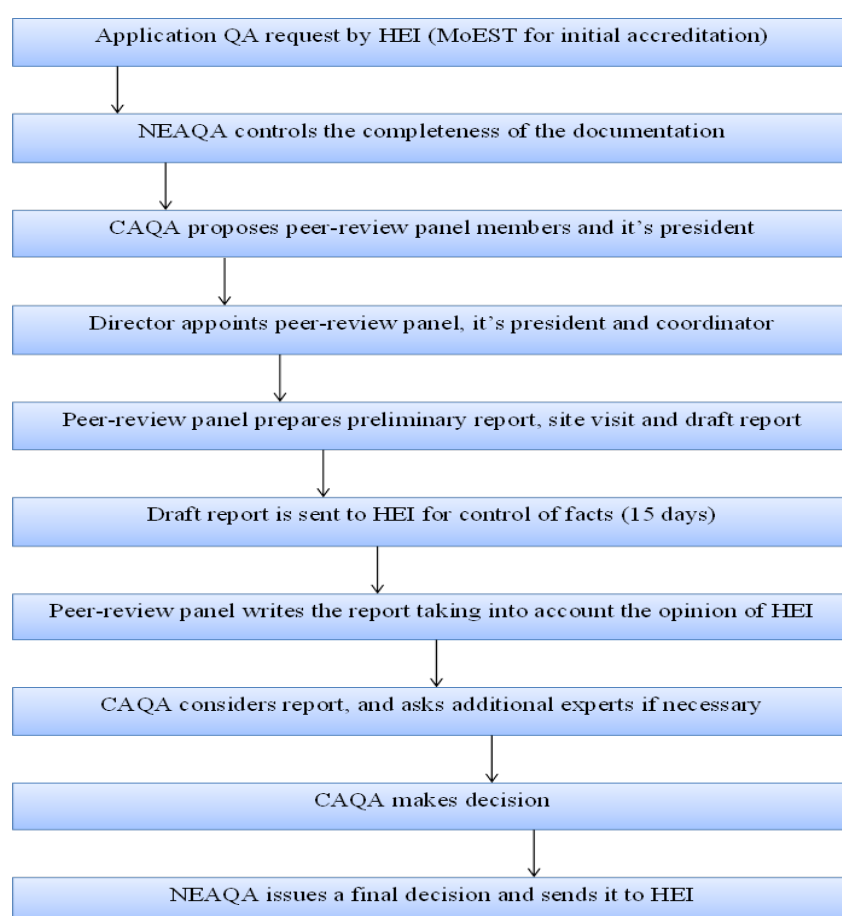
- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

2017 review recommendation: CAQA should (1) revise its procedures to include a site visit as part of each periodic programme review; and (2) devise a way for HEIs to report on progress in the implementation of its recommendations as part of existing or new arrangements; (3) consider developing guidelines on scoring for academic experts to ensure greater consistency in their approach to assessment. See also the related recommendations about the involvement of CAQA members and experts under ESG 2.2. and 2.4.

Evidence

While already the 2017 standards started introducing the site visit with students and labour market experts, changes in the LoHE were necessary to remove the anonymity of external experts as a condition and thus enable CAQA to appoint independent panels to participate in site visits, as is now defined by the new standards adopted in 2019. The procedure is now the same for all types of accreditations and the audit, and is depicted by the chart from the SAR below.

Figure 3: accreditation timeline (source: SAR, p. 64)



Upon request of the panel, NEAQA has also produced the table below.

Table 5: comparison of the old (2017) and new (2019) procedure

	2017 procedure implemented by CAQA	2019 procedure implemented by NEAQA
Launching the procedure	The accreditation request submitted to CAQA staff	The accreditation request submitted to NEAQA staff which issues the certificate on completeness of the documentation
Finding experts	CAQA appoints two reviewers	CAQA proposes members of Peer review panel and director of NEAQA appoints it
Experts decision	Two experts check the documentation and give the evaluations	Peer review panel checks the documentation and goes to a site visit in order to complete a report and makes a decision proposal
Sub-commission of CAQA	Two reports of the reviewers are delivered to a sub-commission, which performs site-visit and makes a report with the decision proposal to CAQA	Report is sent to CAQA's sub-commission which forwards it to CAQA 2018
Making decision	CAQA adopts the decision and issues a formal certificate	CAQA adopts the decision and NEAQA issues a formal certificate

As is noted in the SAR, only the self-analysis which is prepared during the 3rd year of the accreditation cycle in preparation for the audit should be considered a true analysis, as it provides HEIs with an opportunity to describe their aims, goals and procedures. While HEIs need to submit comprehensive documentation prior to each accreditation, this documentation is not analytical but rather amounts to describing compliance with detailed criteria and collecting evidence and data.

While every programme and institutional accreditation is administratively considered as a separate file, led by a separate expert panel, in practice very often the panels evaluating programmes of the same institutions overlap in members and only one site visit is organised, normally lasting between 6 and 8 hours. Among the new pilot procedures, there was an institution at which 7 programmes and the whole institutions were evaluated during one such site visit. As is already noted in the 2017 report, it is not fully clear if the programme and institutional evaluations would take place at the same time. At the site visit it was established that this indeed is the preferred method, however sometimes the programmes have varying accreditation deadlines and in such cases this is not possible.

One unusual aspect according to the panel is that during the meeting with students at some point the rest of the panel leave the room, leaving only the student member to talk to the students. . The explanation provided during the site visit by the agency representatives and the experts was that the students feel safer talking to their peers.

LoHE provides for a possibility to issue an 'opinion' – a type of a conditional decision – in the audit procedure, for a period of up to 6 months, after which a yes/no decision must be made. The SAR notes that opinion will no longer be issued for the new procedures, but, as no audits were implemented according to the new procedures, there is no evidence available to show if that would also be the case for audits. The opinion was already discussed under 2.2, and provides recommendations for

improvement. LoHE does not include the possibility to issue an opinion in accreditation procedures, and it is not regulated in detailed by the NEAQA regulations, nor discussed as a possibility in the SAR. An opinion issued in a programme accreditation procedure was submitted to the panel, as apparently in the transition phase it was kept in old cases as a replacement for the 'act of warning' that used to be issued by CAQA in line with the old law.

The reports from the new, pilot accreditations were available to the panel in Serbian, with summaries in English. They all contain general recommendations for institutional action, with a note that only the recommendations referring to standards assessed with a low grade (6 or 5) are mandatory for the institution to implement.

Similarly, follow-up is not described in the regulations; instead of a mid-cycle follow-up, an audit exists as a separate procedure. SAR mentions the possibility of introducing a separate follow-up report as obligatory after two years, and recommending that an audit is implemented earlier at newly established HEIs. No follow-up or audit reports from the new cycle are available yet, and no procedures apart from periodic program and institutional accreditations have been implemented.

Analysis

As NEAQA also notes in the SAR (p. 37), the purpose of evaluations should not be a binary result, as there are always areas for improvement, especially in a system that has limited experience and awareness of QA. Thus, if the purpose is enhancement, then the agency should be particularly committed to follow-up and fostering continuous improvement, and implementation can be a major factor in this respect. While introducing a regular follow-up report to all procedures would mean that HEIs produce some kind of a report every second year, considering the overall stakeholder support to frequent monitoring, this might be a reasonable demand if it is as administratively light as possible. The expectation is also that after two cycles all HEIs meet the minimal accreditation criteria, and is thus not to be expected that they would receive positive decisions with many mandatory recommendations the fulfilment of which would need to be evidenced with comprehensive documentation. One aspect that it was not fully clear is what happens when major structural issues are identified in a program or in an institution. What can the agency do? How can it lead the institution to address them? While the panel did receive samples of reports which did identify such issues, as there are no follow-up or audit reports available, this will remain an open question.

Though some meetings can be common and even though it is fairly standard to cluster similar programs in a single site visit, the panel finds the current site visits too short. Interviews normally last for half an hour which does not seem sufficient to get more into more than few issues. It is true that this is partly offset by the practice of drafting reports before the site visit, which might help panels focus. It is also true that conducting site visit is a novelty for most experts, as only CAQA members were conducting them before, and thus the opportunity to discuss anything at all is vastly appreciated.

Additionally, the agency should consider carefully how its expert panels will react to issues which were raised during the part of the meeting with students which is held by the student panel member alone. It is true that this practice is understandable as it provides a safe space for students. However, because this meeting is not attended by the whole panel, the integrity of the review could be at risk. The separation of the panel could translate into a trust issue between a student expert and other experts when controversial information is received during the individual meeting with students.

Panel recommendations:

The agency should deepen the level of assessment, in which longer site visits would be of help. This would enable longer meetings which could thus serve as a forum for enhancement-oriented discussions in addition to being a source for evidence checking.

The agency should develop mechanisms of clustering similar programmes in the same institution to assure greater congruence and efficiency of evaluations, rather than organising this ad-hoc and without an impact on the costs of the evaluation.

It should be decided in a broad discussion with stakeholders if audit is meant to serve as a follow-up to accreditation or a separate follow-up procedure is necessary, and if audit itself should have a clear follow-up also in cases when the opinion is not issued.

Panel suggestions for further improvement

The agency could try discussing if the students would support involving the whole panel in the whole of the student meetings during the site visit, and if the feedback is positive, try piloting such procedures.

Panel conclusion: partially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2017 review recommendation: CAQA should (1) ensure the involvement of external experts as playing a central role in EQA processes, in line with the ESG; (2) ensure the involvement of students and labour market representatives in all periodic programme accreditation reviews; (3) provide space for students to contribute to its EQA processes beyond a range of aspects considered to be strictly student matters; (4) ensure much wider involvement of international experts, not only in periodic programme accreditation reviews but also in audits; (5) provide regular training, and feedback on reports, to academic experts. See also the related recommendation about CAQA's role in EQA processes under ESG 2.2 and guidelines for experts under ESG 2.3.

Evidence

It has already been noted that the most crucial change taking place with the 2017 LoHE was that the experts are no longer anonymous and that independent peer-review panels are formed in every procedure. The panels are appointed by CAQA – with NEAQA director signing the decision, which is then published. HEIs do not get a specific opportunity to respond to the panel composition while in principle the Administrative Law enables them to file a complaint. CAQA is not able to independently find experts, but has to choose among the lists provided to them, as follows.

The academic experts apply to a public call published by the National Council. As confirmed at the site visit, even though the regulations would allow for the National Council to do this independently it forwards the applications received to CAQA to remove those not meeting the formal criteria and then publishes as long a longlist as possible. This list currently contains around 1000 names according to

the information from the site visit. The list contains the following data: name and surname of the reviewer; state, place and institution at which he acquired the highest level of education; current teaching-scientific qualification and the year and institution in which he was elected for the teaching-scientific position; and educational-scientific, i.e. educational-artistic field and domain within which he was chosen for the teaching-scientific position. LoHE proscribes that a person elected, designated or appointed to an office in a state authority, a body of the autonomous province or local self-government, a body of a political party or to the post of the executive body of a higher education institution, as well as the person being a member of the National Council, the Accreditation Commission, i.e. employed at NEAQA may not be found on the list of reviewers.

Due to the lack of international experts, the call for their applications is open until the end of 2019. In the accreditation process of PhD programmes one of the academics is always an international expert/reviewer. At the moment in the pool these experts are mostly those from the region and Serbian-speaking academics living abroad. The SAR states that the reasons for current pool composition is in two facts: (1) NEAQA wishes to foster regional cooperation keeping in mind numerous similarities of HE systems (e.g. countries of ex -Yugoslavia) which should encourage cooperation and best practice exchange; (2) the language barrier which asks for translation of the documents in English language, which induces additional costs wither for HEIs or NEAQA.

According to the SAR, NEAQA has decided to internationalise its pool. The first step was taken in the second call for reviewers when in the application form the applicants were asked to assess their English language skills. This will also allow NEAQA to recommend its experts to other QA agencies and provide them with additional experience and education which will be valuable for the domestic external assessments. Furthermore, in order to overcome the language barrier CAQA plans to ask from the applicants in one of the coming new accreditations, to submit the accreditation documentation for PhD programmes in English language. These steps are aimed to expand the quality processes and, even though LoHE regulates this only for PhD programmes, there is no barrier for use of international experts in the future in other quality assurance processes.

Students are nominated by the two student conferences while previously they were nominated by HEIs. The representatives of the student conferences explained at the site visit that they invited applications of their members through their local organisations at each HEI – student parliaments - and left it to them to make a selection. As this was the first time they were doing it and they had a relatively short deadline, they decided to use grade average as criteria. They do not consider this to be the best criterion however and plan to develop better criteria in the future. The other stakeholders at the site visit specifically expressed their satisfaction with the student reviewers, and students themselves confirmed that they felt as equal panel members and, after the first review, confident with their acquaintance with the procedure. Lists of students and labour market representatives are available on NEAQA website. The SAR states that the assessment of their knowledge of English language will be conducted in the future.

The labour market representatives are nominated by the Chamber of Commerce and other professional associations. It is mentioned in the SAR that extra effort should be invested in their animation and willingness to participate because this new aspect of QA induces some challenges:

labour market representatives should invest their time to learn about HE system and QA standards since the whole system is not well known to them; adequate financial compensation for the opportunity costs, etc. At the site visit it was explained that due to the wish to engage only with the most prominent professionals, numerous cancellations took place as these are very busy people.

In order to prevent conflict of interest NEAQA adopted Code of Ethics and Regulations on Peer review experts which regulate the behaviour in QA processes. As confirmed at the site visit, all three groups are informed of the existence of these regulations and are obliged to sign the statement on the absence of conflict of interest. However, it happened in one case that an expert was invited to assess his previous employer.

As noted in the SAR, CAQA graded the work of experts and ranked them on the basis of the quality of their reports. The panel learned at the site visit that low grades were given to experts that were overtly lenient in their assessments. There was limited explanation of how the process of grading of experts works and what are its actual consequences. It seems that this is kept as an informal practice as discussed at the site visit, as there are no formal surveys to assess the experts' work, while NEAQA takes that feedback into consideration when forming future assessment committees. However, it was confirmed at the site visit that CAQA did not stop hiring experts with low grades, but decided to give them one more chance. It was also noted during the site visit that because the new procedures no longer include individual assessments, the experts would probably no longer be graded. Instead, there are plans to collect feedback on each expert from other peers in the panel.

CAQA has created guidelines and report templates for reviewers. These were available to the panel in Serbian, and it was noted during the site visit that while these were useful, they do not provide instructions on grades. During April and May 2019 CAQA has organised trainings for reviewers in three regional centres: Nis, Novi Sad and Belgrade. On these trainings the total of 448 reviewers was present of which 408 academics, 39 students and 1 labour market representative. Beside these general trainings, CAQA organises briefings for peer-review panels before each assessment and site visit, as the panels meet to write the draft report. The international experts have confirmed to be included in this meeting via videoconferencing and emails. The expert panels were also accompanied by NEAQA staff when visiting HEIs during the pilot procedures. All the experts present at the site visit confirmed that they were always supported by NEAQA secretariat during the entire evaluation process.

The panel discussed the trainings during the site visit. While the students showed interest in discussing various aspects of the ESG, the student-centred learning, learning outcomes, etc., the peers from the academia and labour market representatives did not express the wish for more trainings.

Analysis

The significant involvement of students and professionals is in the view of the panel rightly regarded by the stakeholders as very positive and relevant, and the panel additionally believes that overall the involvement of full peer panels is the major improvement that took place since 2017 review. NEAQA itself is well aware of the most challenges that remain, as noted in the SAR and during the site visit.

The use of international reviewers has been very much limited by language issues, leading to a dominance of experts from neighbouring countries that, in several cases, may have been trained in Serbia or have strong links to the system. Internationalization is very important (given the small size of the system) and hinders an actual international perspective and therefore the selection of international experts should be broadened, especially with PhD programs and more research-intensive institutions. Agency should also consider expanding geography of its foreign expert pool as a measure to achieve its goal of internationalization.

Introducing international experts is also an important mechanisms of dealing with conflict of interest. There was also a comment during the site visit that the concept could also be redefined. Currently NEAQA considers only current connections to present a potential conflict, which is acceptable, however experts could also be allowed to report a conflict of interest also if it is only perceived – e.g., if they do not wish to evaluate a former employer. Generally speaking, the panel is satisfied that NEAQA takes this aspect seriously and ensures that the reviewers are not partial in their evaluations.

The training seems rather limited, as the trainings only took a day and included almost a hundred people per training. The time is short and the number of experts trained in each session is too large to prevent significant learning and interaction. In the discussion with the representatives of the experts trained by NEAQA the panel got the impression that not all experts are aware of the complexity of QA and do not distinguish between the experiences gained in their academic career and the aspects with have to be checked due to the requests of external QA. Some found the training unnecessary, which is less surprising considering that it focused on showing the standards, which could be easily read by the experts in their own time. Training for experts needs to be provided regarding grading the results of the checking of NEAQA criteria, as well as in report writing, together with practicing interaction on site. The agency should aim for deeper training that could not only familiarize the experts with basic procedures, but also train them in reviewing and QA, provide time for commenting reports, role-playing etc. As also noted by student representatives, general EHEA issues should also be part of the training, such as learning outcomes, ECTS, approaches to ESG, etc. Having a PhD and a lot of experience does not mean that one will automatically avoid speechifying, have good understanding of concepts like student centred learning, etc. The presence of a coordinator from the agency on site is crucial for the same reason. Trainings are better organised as smaller workshops with e.g. examples of bad reports, unacceptable behaviour on site and potential mistakes and pitfalls, than ex-cathedra lectures on standards which the experts can anyway study on their own. Rather than insisting on mass lectures of this type, it would be better to focus on small, interactive training sessions, possibly starting by including only e.g. students and panel presidents.

Finally, students are usually expected to work on the standards which refer to the students during a review. However, they can contribute to every standard in the review and should be encouraged to do so.

Panel recommendations

The training of reviewers should be more regular and focus on gaining actual competences, preferably through working in much smaller groups. These competences include the skills necessary to

successfully lead interviews and organise group work, as well as understanding of key EHEA concepts such as student-centred learning, ECTS and learning outcomes, etc.

NEAQA should develop a process which secures that an expert is not asked to assess their previous employers, e.g. by checking short CVs of the experts before inviting them.

Panel suggestions for further improvement

To save time and funds, NEAQA can consider creating online presentations, videos or briefing documents covering the content the experts can study on their own, such as the legal documents including evaluation standards, but also key EHEA concepts. This could help them prepare for the training, and those unable to participate in trainings could use this to prepare for the first meeting in the evaluation.

The agency would do well to more actively implement its plans to internationalise the reviewers' pool.

Panel conclusion: substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

2005 review recommendation: CAQA should define more explicitly in its internal regulations the benchmarks for its decisions (an 'act of warning' as opposed to refusal of accreditation, and approval as opposed to follow-up n audits) which are consistently used in practice.

Evidence

As explained in the SAR, all of NEAQA's processes end with a formal outcome, and accreditation outcomes are binding for the Ministry which uses them to issue or revoke a licence. Initial accreditation reviews lead to a positive or negative decision by CAQA, based on which NEAQA issues an opinion to the Ministry. Upon completion of a periodic accreditation review, NEAQA may grant accreditation and issue an accreditation certificate, or refuse accreditation. An 'act of warning' (regarded as an intermediate or temporary outcome) is no longer provided in LoHE for accreditations, but it is used for the accreditation requests submitted before the enactment of new Law. In the case of refusal, Ministry revokes the licence or amends it to exclude the non-accredited programme. An audit ends with CAQA adopting a report which confirms that a HEI fulfils its QA obligations with recommendations for further improvement of which HEI needs to inform CAQA after two years, or initiating a follow-up process through the opinion discussed under ESG 2.2, with a six-month period for HEI to improve.

Minimal standards for accreditation are set by LoHE: the number and type of programs necessary to become a certain type of HEI; that at least 70% of classes need to be taught by full professors at academic programs (50% for arts programmes), and at least 50% by people with PhDs at professional programs; that a HEI needs to employ at least 20 full-time professors; division of ECTS for each type of programme; HEI governance; necessary resources, etc. The standards are then further developed

by the National Council, in cooperation with CAQA. The National Council had produced separate regulations containing standards for initial accreditation, programme and institutional periodic accreditation, audit and self-evaluation of HEIs (which serves as a basis for audit). At the time of the site visit, a new separate set of standards was being prepared specifically for the academies of applied studies to enable evaluation of the proposed dual education models. Based on these regulations, separate forms, templates and tables are available for different types of HEIs (one for universities and academies of applied studies, another for faculties and colleges) and programmes (one for scientific and one for artistic PhDs, and one for first and second cycle programs), and are supplemented by templates to be used by the panels and HEIs. The templates and the forms provide further instructions on how to apply the standards – e.g. how to calculate indicators on student numbers and publications in various disciplines. All of the documents are published on NEAQA's website both in Serbian and English.

Regarding the decision-making, at the moment CAQA operates in two manners. One is applied to the “old cases” and the decision-making processes for accreditation requests for institutions, programmes and initial accreditation received before December 2018 are conducted as follows: decisions are proposed by the CAQA sub-commission whose members are directly involved in a given review / audit. CAQA takes decisions in its meetings by a simple majority vote, with at least two-thirds of the membership required to attend; a member from a HEI undergoing the review / audit concerned does not vote. CAQA takes decisions based on compliance with the standards defined for its EQA processes, as assessed in its final reports where CAQA integrates findings from its own analysis of documentation, academic experts' reports and site visit reports. The experts were anonymous and they did individual reports based on reviewing documents, and graded each standard using the 5-10 scale used in the Serbian HE system for student assessments, without participating in the site visit. During the site visit, performed by the CAQA sub-commission to which a student and a labour market representative were added later, the key standards for accreditation were those covering curriculum, staff, space and facilities. An ‘act of warning’ or ‘opinion’ is issued where shortcomings can be eliminated in a short time (one week to six months, according to the procedure, e.g. one course to be replaced; mission and vision not clear), and otherwise (e.g. significant gaps in curricula, inadequate qualifications of staff) accreditation is refused. No minimum criteria or benchmarks are defined for audits, but there are detailed reports with as many recommendations as possible, and follow-up is initiated if a significant shortcoming is identified under any standard. In August 2018 the reappointed CAQA inherited 383 pending requests. At the moment 254 were processed of which: 135 got the accreditation, 77 acts of warning/opinion, 34 were rejected and 8 waived the request. Deeper analysis of these decisions has not been performed by CAQA, and this was explained in the SAR by time constraints.

The standards have not been changed substantially with the new procedure (see ESG 2.1 on this), but a number of procedural changes took place. The expert panel composed of 2 or 3 academics, a student and a labour market representative meets before visiting the institution to produce a draft report, and then finalises after the site visit. They agree on a single set of grades and a decision and submit a draft report to NEAQA which forwards to the HEI for a 15-day factual check. Comments are then forwarded to the Panel which takes them into consideration and prepares the final assessment report which is submitted to CAQA which can ask for clarifications, additional arguments etc., but does not participate in the panel's decision. A sub-commission is formed which analyses the report and, based on their conclusions, CAQA passes the decision. The SAR notes that NEAQA considers the new procedure to be improved through trainings of experts who now receive guidelines on decision-making. No decisions were yet made in the new procedures when SAR was being written. Before the site visit several new procedures were completed, and the participants commented on the site visit that the decision-

making is now more objective as the whole panel needs to reach common grades and agree on the final decision, while previously each expert provided their own set of grades. The experts the panel met on the site visit confirmed that, as expected by the procedure, CAQA members required additional comments and explanations in some cases but did not try to change the reports. Experts' work is considered to be completed only after CAQA has made its decision based on their report. As any decisions in the end need to be signed by the NEAQA director, this was mentioned at the site visit as an additional control mechanism.

Analysis

As noted under 2.1, the criteria for outcomes have not meaningfully changed since the 2017 review, however, the grading method was improved. Now the whole panel reaches a common grade, while previously each done their own grading individually. While grades are still crucial for decision making and the overall outcome, there still seems to be no interpretation on what particular grade for a standard means besides a general expectation of a correlation between the grade and the evidence and recommendations provided. At the site visit the discussions seem to point to a general subjectivity in assessment which cannot be avoided. This is a very important challenge, especially as the number of programs and institutions being reviewed will grow significantly in the near future. As a result, the agency does not have in place robust and explicit mechanisms to ensure a consistent and fair application of the criteria. There are various possibilities to introduce these (critical readers of preliminary reports, committee of experienced reviewers, a scrutiny group of experts who check and the reports without writing them or making decisions themselves, systematic comparison of different standards in the same field, a database of decisions and precedents, etc.) and it is up to the agency to devise the one that finds more suitable, as this is a critical issue in building credibility upon its decisions and that these are regarded as transparent, well-grounded, and fair.

Numerical grading is a common practice in many countries, even though it can be self-serving, time consuming, and leading to an illusion of objectivity. However, in principle there are no obstacles to using it but it does require clear descriptions of when a grade should be given, to avoid subjectivity in the assessment. Even this does not necessarily remove all bias from grading, and does leave the issue of essentially a subjective scale being treated as objective and e.g. calculations of averages being incorrectly used for decision-making.

All of this is especially important as a few stakeholders met at the site visit commented the credibility of the previous CAQA, and most stressed the importance of NEAQA being seen as an objective body with robust decision-making procedures. As NEAQA is just starting a new cycle of reviews, this is a good moment to introduce them.

Panel recommendations

NEAQA needs to implement the 2017 recommendation to provide benchmarks for its decisions and not base them solely on numerical grades.

In addition to improved trainings (see ESG 2.4) NEAQA should also implement one or more of the numerous practices existing to improve consistency in its decision-making – such as critical readers of preliminary reports, committee of experienced reviewers, a scrutiny group of experts who check the reports, systematic comparison of different standards in the same field, a database of decisions and precedents, etc.).

Panel suggestions for further improvement

When CAQA discusses a HEI or a programme a CAQA member is connected with, in addition to abstaining from voting, it would be well that the member leaves the room so that other CAQA members can discuss freely.

Panel conclusion: substantially compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

2017 review recommendation: CAQA should (1) devise a way for ensuring, even within the current legal constraints, a more substantial contribution from external experts, including academic experts, students and labour market representatives, to its final reports; (2) devise, in collaboration with the Ministry of Education, an arrangement for CAQA to publish its initial accreditation opinions / reports on newly accredited institutions and their programmes; (3) define more clearly the rules for the publication of reports in its internal regulations; and (4) consider providing drafts of its reports to HEIs for a factual accuracy check. See also the related recommendation about involvement of external experts under ESG 2.2.

Evidence

As discussed in the 2017 report (p. 45) and repeated in the SAR (p. 46), according to the old procedures three types of reports were produced as part of CAQA's processes: (1) individual academic experts' reports based on the analysis of documentation from HEIs; (2) site visit reports (where a visit is undertaken) drafted by CAQA members involved, with comments on drafts from students and employer representatives integrated; and (3) final reports, drafted by the CAQA sub-commissions concerned, which incorporate findings from the other two reports which provide the basis for CAQA's decisions/opinions. Where there was a difference of opinion between experts in their preliminary reports, CAQA members verified this during a site visit and rely on their findings. Only samples and summaries of these reports were published, as the old regulations explicitly required that reviewers remained anonymous and that reports were not published.

According to the new procedure, a final report is written by a peer-review panel, which includes three academics, a student and a labour market representative respectively. For all QA processes the templates were developed by CAQA and they are available on NEAQA website. They contain general information on the QA process, HEI, panel, analysis of standards and their grades, summary, recommendations and signatures of panel members. The draft of a report is sent to the HEI for a factual accuracy check and if it has any comments on it the panel has to take them into consideration before making the final report, which is sent to the appropriate sub-commission of CAQA. Beside the report, panel is also obliged to write a short summary in Serbian and English. There are no longer any provisions in the Law on the report publication. While the plan in the SAR was to publish only summaries, during the site visit full reports from new procedures were published on the NEAQA website (in the rubric Accreditation Outcomes, available in the Accreditation section) and assurances were given that this practice would continue. It was also confirmed that other documents arising from the procedure –such as the opinions which serve as a temporary conditional decision – would also be

published. The documents are available in Serbian, and summaries are available at the English version of the website. The agency also publishes a list of accredited institutions and programmes as a booklet for students and the public. The panel however had no opportunity to see a SAR from the new procedure in any language, or a new report in English which makes it difficult to give a feedback on this.

From the discussions at the site visit it could be established that each panel member assumes responsibility for a couple of standards in the report, and then the president coordinates them and submits the final version to NEAQA. The responsibilities are divided on the basis of experience, and there are standards which are typically 'covered' by students or labour market representatives. NEAQA staff do not participate in writing reports as it is the role of the panel president to coordinate this. During the site visit there were comments how it could only be expected that the reports vary in style and quality as they are written by different people.

Analysis

The panel is satisfied that the reports are currently published, and it is easy to locate them on the NEAQA website. However, currently there is no evidence that also decisions and opinions are published, as there were none by the site visit (even though a number of procedures was completed, it was directly before the site visit and there was thus still no time to adopt decisions). Publishing reports and decisions is also not part of the regulations and until it is, there will be no guarantees that all reports are indeed published.

Bearing in mind that the whole reports and decisions are only available in Serbian and not the whole panel was able to read them, in addition to the fact that few new procedures have been implemented, the following can be noted. The reports represent a satisfactory analysis of the standards, with detailed arguments and evidence. A comparison of new and old reports reveals that new contain more general recommendations, rather than brief instructions on how to meet a certain minimal criterion. The decisions are only available for the old cases, however they are short and informative, providing the summary of the review, and in the case of institutions they list all the programmes and accreditation decisions for those.

It was shown at the site visit, and is also obvious from the 2017 report, that the public is aware of the importance of accreditation and that students check the status of their HEI. However, as the publication of the reports is a very recent practice, it is not possible to discuss their dissemination. Also considering that NEAQA is a newly established body, dissemination is an important issue at this stage.

Panel recommendations

It is necessary to uphold the practice of publishing all full reports, and include this in the regulations, at least the NEAQA statute as other regulations can only be changed by other bodies.

The responsibility for the dissemination of results should be awarded to both the agency and to the institutions, which should ensure that prospective and current students, employers, and other stakeholders have easy access to the results of accreditation processes. Furthermore, the agency should find creative ways to make those stakeholders aware of its work and its impact, as this is critical to build trust upon the HE system and to show the relevance of its work in that respect.

Panel suggestions for further improvement

The agency is aware of possible unevenness of the reports as an issue and would do well to collect good practice examples in reporting and disseminate them through its trainings.

Panel conclusion: substantially compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2017 review recommendation: (1) CAQA should put in place a procedure for HEIs to file a complaint as it is defined under ESG 2.7; and (2) a separate appeals body should be established within CAQA (or within a new quality assurance body to be set up by the newly enacted Law on Higher Education).

Evidence

LoHE regulates the appeal procedure stating that the appellate body is the National Council. In the case of refusal of accreditation, the HEI concerned may file an appeal to the Council through NEAQA. The same is true of a negative decision in the audit procedure, according to LoHE. The appeals procedure is laid down in the Rules of Conduct of NCHE in making decision upon the appeal in the process of accreditation and operation of the appellate commission, published on the Council website and available to the panel in Serbian. According to these rules when NEAQA receives an appeal and if it finds the appeal justified, it may change its original decision, with or without an additional review. Otherwise, an appeal is considered by the Council within 90 days. The Council appoints an appellate commission among the experts from its list who have not otherwise participate in the procedure, whose task is to analyse the appeal and the documentation and propose a decision within 30 days from the day of appointment. The Council then takes a decision on the basis of this by a majority vote. It may (1) reject the appeal if the procedure was properly implemented (or procedural faults had no impact on the decision) and its decision is justified and taken in compliance with the relevant regulations; (2) override the decision, in whole or in part, and instruct CAQA to reconsider its decision and conduct another review if key evidence is incomplete or incorrect, or the relevant regulations were not taken into account, or the decision is unclear or not adequately substantiated; (3) override CAQA's decision and take its own decision based on the evidence collected if the evidence was incorrectly assessed or led to an erroneous conclusion, or the relevant regulations were incorrectly applied. The third option is only possible if CAQA, after the Council has returned the decision for reconsideration, again rejects the request, that is, in the second appeal. According to the LoHE if the Council refuses the appeal, HEI can initiate an administrative dispute in the court. Table 6 provides a description of the appeal procedure in accreditation, however the same procedure also applies to negative decisions in audits.

Table 6: the appeal procedure (source: NEAQA)

Phases of appellate procedure	Procedures for accreditation of HEIs/study programmes
Rejection decision and possibility to file an appeal	The higher education institution may file an appeal against the decision of the National Accreditation Body rejecting the request for accreditation, within 15 days from the date of

	receipt of the decision, to the National Council and through the National Accreditation Body.
Role of NEAQA in the appellate procedure	If CAQA finds that reasons stated in appeal are grounded it could change its decision. If CAQA does not change the decision it forwards it to NCHE.
Decision of the appellate body	NCHE can: 1. Dismiss the appeal in cases when it is inadmissible, untimely or filed by an unauthorised person; 2. reject the appeal when it finds that the accreditation procedure is conducted in the correct way and that the decision on rejection is made in accordance with the LoHE and regulations; 3. to annul the first instance decision and with adequate explanation return to NEAQA when it finds omissions in the process of accreditation.
NEAQA's decision upon the annulment of its decision	NEAQA is obliged, upon the receiving of the decision of NCHE, to make a decision in accordance with the legal reasoning of the NCHE.
NCHE's decision after NEAQA's repeated rejection of accreditation	In case that NEAQA rejects again accreditation and HEI files again a complaint, NCHE will make a decision on its own, within the 30 days upon the receiving of appeal.

Some stakeholders at the site visit commented on the option to overrule CAQA's decision as a fault in the procedure which needs to be amended and as a key motivation to suggest a new law to the Ministry, as is also noted in NEAQA Strategy. Others emphasised that this was used only once in practice and that the National Council would normally uphold CAQA's decisions and try to avoid such a move.

Table 7: Number of appeals submitted to NCHE in 2018/19 (source: NEAQA)

Appeals	Number
Not yet reviewed by NCHE	13
Returned to NEAQA to repeat the review process	5

The SAR did not comment on the complaints procedure, and there was significant confusion expressed at the site visit as regards differences between complaints and appeals. It was finally established by a National Council member that the complaints procedure is defined by the Administrative Law, and that according to it HEI can at any point in the process file a complaint to the NEAQA director or Management Board, as is the case with any other public institution. NEAQA has no specific regulations on this.

Analysis

This is a recognized weakness by the agency and needs to be addressed effectively. As both complaints and appeals are regulated by the Administrative Law, it is beyond the scope of this report to comment on the possible legal challenges in changing this practice. Despite the legal constraints, however, a fair, independent, and effective mechanism of complaint and of appeal is a crucial piece of the system and needs to be in place to nurture the trust of institutions. The option the Council has to overrule CAQA's decision is a major threat to the independence of formal outcomes of NEAQA's procedures. It is even more worrying that the Council itself has created no detailed guidelines for itself on when and how it should make such a decision. The argument that this happens very rarely should not be used in this context, because a decision to remove the accreditation from a programme or an institution is a serious one and should not be subject to change without an established procedure of checking evidence and decision-making. In the perspective of the panel, a complaints procedure should focus on the procedural aspects of the evaluation and not its outcome. Thus, the complaint can never result in a changed decision, but at most the decision to annul the original one and repeat the evaluation; otherwise the agency's independence is threatened.

The panel also finds that rather than having a separate second-instance body established by the Government (as is the case with the National Council), it is a more common practice that the agency establishes its own body which would still function independently. This is the only way in which the panel would be able to check if the agency is fully responsible and independent in deciding on the formal outcomes of its procedures. It would also enable the agency to involve people with sufficient expertise and experience as well as students. However, it is not explicitly required by the ESG that there is an independent appeals body that is established by the agency itself. The Council should abstain from overruling CAQA's decisions. It would be even better if a legislation could be changed in a manner that would provide NEAQA with a standing appeals committee. Such a committee should be independent from the decision-making body and not be influenced by the institutions. The committee should never override the decisions of the agency. And it should have clear rules of procedure.

Regarding complaints, apart from comments on the factual accuracy of the reports, it seems that the agency and its stakeholders have only during the site visit become aware the possibility to file complaints on any step in the procedure. This might not be surprising concerning that it arises from the Administrative Law and applies to public legal persons, which NEAQA has become only recently. The lack of a complaints procedure can be amended without changing the legislation.

Panel recommendations

It is necessary to ensure that an independent body decides on appeals in line with an established procedure of decision-making. Such a procedure should not have changing the decision as an outcome, and the agency and its stakeholders should try to ensure this to the degree in which this is possible without changing the law. Such an independent body should always include not only different stakeholder perspectives but also legal and QA expertise and experience.

The panel recommends NEAQA to develop a complaints procedure adapting the Administrative Law.

Panel conclusion: partially compliant

ADDITIONAL OBSERVATIONS

TIMING OF THE REVIEW

It is necessary to note that even though CAQA, of which NEAQA is the legal successor, has gone through two ENQA reviews, NEAQA itself is a body formally established in February 2018, less than 2 years before the time of this review. In the short 2-year period between the last and current review, NEAQA was established together with its Board in line with the 2017 LoHE, and CAQA was reorganised. In addition to compliance with the changed legislation, the major challenge in the reorganisation of the institution and the connected system has been compliance with the ESG, as emphasised in the NEAQA 2019-22 Strategy. Many important steps in the right direction have thus been taken in a very short time, and the panel would like to emphasise the improvement in a number of aspects of NEAQA work and the visible commitment of the staff and stakeholders to continued development. However, the timing also resulted in the fact that on several standards evidence was lacking, and it is the overall impression of the panel that the compliance assessment could have been more positive if the review had not taken place so soon. At the same time, the change NEAQA is trying to achieve is much broader and more difficult than the organisation of its structure and processes, and the NEAQA 2019-22 Strategy shows that NEAQA is aware of this. A lack of trust is present in the system and the society which moulds the attitudes and behaviour in QA. While NEAQA emphasises throughout the SAR the need to focus on quality culture and, as phrased by the Strategy, leave the idea of conducting an “inspection” behind, many of the stakeholders still hold that its main mission is to check HEI resources and further purge the HE system from untrustworthy providers. A cultural change thus needs to take place if the HE and QA system are to be reoriented in line with the expectations of the 2015 ESG, while at the same time keeping the level of control over HEIs that is required in a system characterized by low trust. It is the hope of the panel that this report will help NEAQA, its staff and members of its bodies, to receive further support in working towards this aim.

SUPPORT TO INSTITUTIONS

As is expected by its Strategy, NEAQA would do well to support HEI training as well as their involvement in international exchange in the area of internal quality assurance and enhancement of teaching and learning using available funding through the Erasmus+ programme and other forms of cooperation with other HEIs and agencies. This would be particularly timely as Serbian HEIs will now start employing quality managers. Further involvement of international experts in NEAQA’s work will also aid the institutional learning process, as will participation in international projects and workshops.

MOVING TOWARDS GREATER INSTITUTIONAL RESPONSIBILITY

Providing more general criteria – instead of requiring HEIs to list each and every detail of their work – could remove the need to do a patchwork between ESG and the national standards, as noted under ESG 3.6. Ideally, this would lead to a situation in which NEAQA is able mid-term to truly operationalise the ESG in the Serbian context, rather than just trying to patch the citations of ESG with the LoHE standards. This is one way in which NEAQA would be able to implement its vision of becoming a leader in QA in the region.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.5: The panel wishes to commend agency for hiring enthusiastic and competent staff.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, NEAQA is in compliance with the ESG.

ESG 3.1: substantially compliant

Recommendations: Even within the present legal constraints, the agency should strive towards involving all stakeholders, and particularly students, as full members in all of its bodies. The agency should use its international connections to also more actively encourage the participation of international experts in its bodies.

The governance of the agency should reflect the diversity of stakeholders and of the HE system and avoid being dominated by a small number of institutions, regardless of their prestige and importance.

The agency should, in cooperation with the stakeholders, develop a new strategy which would enable the implementation of its mission of enhancing quality of Serbian HE in line with the international standards while keeping a level of control that they find is needed in their system.

ESG 3.2: fully compliant

ESG 3.3: substantially compliant

Recommendations: In addition to involving more experts from outside the system (see ESG 3.1), the independence of the agency from HEIs as well as the government can be strengthened by the following steps, which need to be taken in cooperation with all stakeholders in the system.

(1) To uphold the operational independence of the agency, define the criteria for membership in the bodies of the system which would focus on a balance of their personal experiences and motivation, in addition to the proportional representation of the system and formal criteria defined by LoHE.

(2) To uphold the organisational independence of the agency as well as the independence of formal outcomes, ensure that the Director is a full-time position with no contractual obligations towards HEIs within the system.

(3) To uphold the organisational independence of the agency as well as the independence of formal outcomes, work with the National Council to define a clearer appeals procedure (see ESG 2.7).

ESG 3.4: partially compliant

Recommendations: The panel recommends NEAQA not only to start regularly producing thematic analyses, but to use them as a tool for self-reflection (see ESG 3.6) and as a tool to promote good and innovative practices that can be spread throughout system.

ESG 3.5: substantially compliant

Recommendations: The agency should establish full costs of the procedures, in order to streamline them if possible and thus reduce the overall costs to HEIs, but also to establish long-term financial plans which would enable it to acquire timely additional support from the state budget if necessary.

The agency should establish a human resources development plan which would provide not only the criteria and plans for employing new staff, but also training and development activities for both existing and new staff.

ESG 3.6: partially compliant

Recommendations: NEAQA should introduce formal mechanisms for collecting feedback from experts and institutions after each procedure, collect more qualitative additional feedback, e.g. through focus groups, interviews etc. to reflect on the procedures, especially the pilot procedures and establish similar mechanisms to regularly collect feedback from internal stakeholders – staff and CAQA members. The feedback should be collected and analysed in a manner that enables the stakeholders to comment on what they find relevant, and that can be used by NEAQA to continuously improve its work and the framework in which it operates, and report this to the public.

ESG 3.7: fully compliant

ESG 2.1: partially compliant

Recommendations: NEAQA internal stakeholders need to reflect on the 2017 recommendations and start a broad discussion with all stakeholders on how to implement them and start the reorientation of the whole system towards the development of the quality culture which presupposes institutional responsibility for implementing the first part of the ESG in its entirety, rather than a more lenient system of external control.

ESG 2.2: partially compliant

Recommendations: The agency should consider the ways in which it could adapt its procedures to different types of institutions it evaluates and their varying contexts.

In addition to and while implementing the recommendations under ESG 2.1, 3.4 and 3.6 which are all also relevant for this standard, NEAQA would do well to establish, in collecting feedback from the HEIs, which issues are strategic and require long-term institutional action, as opposed to details which can be corrected quickly. This should be emphasised in guidelines to panels and taken into account by CAQA when giving recommendations, to avoid an overtly prescriptive approach and enable change and development.

ESG 2.3: partially compliant

Recommendations: The agency should try to deepen the level of assessment, in which longer site visits would be of help. This would enable longer meetings which could thus serve as a forum for enhancement-oriented discussions in addition to being a source for evidence checking.

The agency should develop mechanisms of clustering similar programmes in the same institution to assure greater congruence and efficiency of evaluations, rather than organising this ad-hoc and without an impact on the costs of the evaluation.

It should be decided in a broad discussion with stakeholders if audit is meant to serve as a follow-up to accreditation or a separate follow-up procedure is necessary, and if audit itself should have a clear follow-up also in cases when the opinion is not issued.

ESG 2.4: substantially compliant

Recommendations:

The training of reviewers should be more regular and focus on gaining actual competences, preferably through working in much smaller groups. These competences include the skills necessary to successfully lead interviews and organise group work, as well as understanding of key EHEA concepts such as student-centred learning, ECTS and learning outcomes, etc.

NEAQA should develop a process which secures that an expert is not asked to assess their previous employers, e.g. by checking short CVs of the experts before inviting them.

ESG 2.5: substantially compliant

Recommendations: NEAQA needs to implement the 2017 recommendation to provide benchmarks for its decisions and not base them solely on numerical grades.

In addition to improved trainings (see ESG 2.4) NEAQA should also implement one or more of the numerous practices existing to improve consistency in its decision-making – such as critical readers of preliminary reports, committee of experienced reviewers, a scrutiny group of experts who check the reports, systematic comparison of different standards in the same field, a database of decisions and precedents, etc.).

ESG 2.6: substantially compliant

Recommendations: It is necessary to uphold the practice of publishing all full reports, and include this in the regulations.

It is necessary to uphold the practice of publishing all full reports, and include this in the regulations, at least the NEAQA statute as other regulations can only be changed by other bodies.

The responsibility for the dissemination of results should be awarded to both the agency and to the institutions, which should ensure that prospective and current students, employers, and other stakeholders have easy access to the results of accreditation processes. Furthermore, the agency should find creative ways to make those stakeholders aware of its work and its impact, as this is critical to build trust upon the HE system and to show the relevance of its work in that respect.

ESG 2.7: partially compliant

Recommendations:

It is necessary to ensure that an independent body decides on appeals in line with an established procedure of decision-making. Such a procedure should not have changing the decision as an outcome, and the agency and its stakeholders should try to ensure this to the degree in which this is possible without changing the law. Such an independent body should always include not only different stakeholder perspectives but also legal and QA expertise and experience.

The panel recommends NEAQA to develop a complaints procedure adapting the Administrative Law.

SUGGESTIONS FOR FURTHER DEVELOPMENT

It is the hope of the panel that this report will be taken as further encouragement to take the role of the agency and QA even more seriously, as well as the level of implementation of ESG in the Serbian system. The report has provided a number of suggestions for further development as well as recommendations elaborated in the report text. These can be summarised as follows:

- QA can become more flexible in adapting to different types of institutions, and more relevant by focusing on outputs and evidence of quality culture rather than inputs. After the legal

changes and with the existing review experience, Serbian HE should be mature for such a change in the approach.

- This needs to be combined with improved robustness and consistency in applying standards in all NEAQA procedures, for which issues emphasised by the ESG Part 3 standards, especially independence and internal QA, are crucial.
- The opportunity for a changed approach comes at a time when the Serbian HEIs are receiving additional support for QA through the opportunity to employ quality managers. This opportunity can be used well by employing people who could act as change managers, participate in international cooperation focused on teaching and learning and implementing ESG Part 1, and they can also be supported through NEAQA analyses and reports.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

9.10.2019			
TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED
09:00 - 10:00	Arrival to the agency, meeting with the Director	Prof Jelena Kočović Interpreter	
10:00-10:15	Discussion among panel members		
10:15-11:00	Meeting with the Working Group responsible for the self-assessment report (including the Director)	Prof Jelena Kočović Prof Ana Šijački Ana Jakovljević Aca Jovic Interpreter	Preparation for the external review
11:00-11:10	Discussion among panel members		
11:10-12:00	Meeting with the Management Board	Prof Sima Avramović, president of the Managing Board Prof Slobodan Unkovic, vice president Prof Milorad Milovančević, CONUS representative Prof Vera Millošević, CAASS representative Miroljub Aleksić, Labour market representative Borijan Soković, SCONUS representative Interpreter	Strategic goals and planning; communication policy (ESG 3.1); Status and independence (ESG 3.2 and 3.3); Research capacity and thematic analyses (ESG 3.4); Funding and human resources (ESG 3.5); appointment of the Director and CAQA; Internal QA and professional conduct (ESG 3.6)
12:00-12:15	Discussion among panel members		
12:15-13:00	Meeting with students involved in external quality assurance processes	Jelena Novakovic Dino Martinic Marija Arsic	External quality assurance processes and methodologies, incl. selection and training of students, role of students in processes, and student perspective (ESG 2); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)

13:00-14:00	Lunch (discussion among panel members)		
14:00-15:00	Meeting with staff (QA and International Department)	Ana Jakovljević Aleksandar Jović Branko Pavlović Marin Milojević Tanja Ristić	Working conditions; development opportunities; independence; staff involvement in internal quality assurance and thematic analyses (ESG 3.3, 3.4, 3.5 and 3.6)
15:00-15:15	Discussion among panel members		
15:15-16:15	Meeting with CAQA members	Prof Ana Sijacki Prof Tanja Bugarski Prof Vesna Colić Prof Ilija Kovačević Prof Aleksandra Janković Prof Darko Plečas Interpreter	External quality assurance processes and methodologies, criteria for decisions (ESG 2.1- 2.6)
16:15-16:30	Discussion among panel members		
16:30-17:15	Meeting with the employers' organisation (Serbian Chamber of Commerce) and employer representatives involved in external quality assurance processes	Mirosljub Aleksic, vice president of the Serbian Chamber of Commerce Representative of the Serbian Chamber of Commerce Dragan Živković Rade Jeftović Interpreter	NEAQA governance, and employers' role in external quality assurance (ESG 3.1); selection and training of employers for NEAQA processes (ESG 2.4); employability and related issues in NEAQA processes (ESG 2); Independence of NEAQA and employers involved in its processes (ESG 3.3) and professional conduct (ESG 3.6).
17:15	Wrap-up meeting among panel members		

10.10.2019			
09:00-10:00	Meeting with experts involved in external quality assurance processes (2 per each type of procedure)	Prof. Goran Petković, University of Belgrade Prof. Sandra Fišer Šobot, University of Novi Sad Prof. Ljubomir Lazić, Metropolitan University Goran Belojević, University of Belgrade Danijela Pecarski, High Medical School for Applied Studies Interpreter	External quality assurance processes and methodologies; selection and training of experts; reporting; criteria for decisions (ESG 2.1-2.6); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)
10:00-10:15	Discussion among panel members		

10:15-11:00	Meeting with HEIs: Conference of Universities, Conference of Academies of Applied Studies and Colleges of Academic Studies	Prof Ivanka Popovic Prof Svetlana Karić	New legal framework; appointment and establishment of new agency; HEIs' perspective on NEAQA governance and independence, incl. relations between NEAQA, CAQA, NCHE and MoES (ESG 3.1 and 3.3); Involvement in designing NEAQA methodologies (ESG 2.2); NEAQA accountability (ESG 3.6); NEAQA thematic analyses (ESG 3.4)
11:00-11:15	Discussion among panel members		
11:15-12:15	Meeting with representatives of the Students Conferences of Universities (SCONUS) and Higher Schools (SCOHS)	Milan Savic, SCONUS Igor Knežević, SCONUS Milutin Markovic, SCAAS Nikola Vajagić, SCAAS Marko Despotović, SCAAS Marija Tasmanović Anita Maljavec	NEAQA governance, and students' role in external quality assurance (ESG 3.1); Involvement in designing NEAQA methodologies (ESG 2.2); Selection and training of students for NEAQA processes (ESG 2.4); student perspective in NEAQA processes (ESG 2); Independence of NEAQA and students involved in its processes (ESG 3.3) and professional conduct (ESG 3.6).
12:15-12:30	Discussion among panel members		
12:30-13:15	Meeting with the National Council for Higher Education (NCHE)	Prof. Bela Balint, president of NCHE Prof. Marijana Dukić Mijatović, vice president of NCHE Prof. Gordana Kocić, secretary of NCHE Prof. Hasan Hanić, member of NCHE	Complaints and appeals (ESG 2.7) Designing external quality assurance methodologies processes (ESG 2.2 and 2.3); Criteria for decisions, and appeals (ESG 2.5 and 2.7); thematic analyses (ESG 3.4)
13:15-14:15	Lunch (discussion among the panel members)		
14:15-15:00	Skype meeting with international experts involved in external quality assurance processes	Milijana Novovic Buric, Montenegro Zlatan Car, Croatia	External quality assurance processes and methodologies; selection and training of experts (esp. ESG 2.3 & 2.4); Independence (ESG 3.3); professional conduct and feedback collection (ESG 3.6)
15:00-15:15	Discussion among panel members		
15:15-16:15	Meeting with HEIs which are part of the pilot accreditations (including QA staff from HEIs)	Milo Tomašević, dean University of Belgrade School of Electrical Engineering Bojan Milisavljević, vice-dean University of Belgrade Faculty of Law Prof. Mladen Veinović, Singidunum University	External quality assurance processes and methodologies; experts; criteria for decisions; reporting; and appeals (ESG 2); independence and accountability, incl. external feedback collection (ESG 3.3 and 3.6) Internal quality assurance policy, feedback collection and follow-up mechanisms (ESG 3.6)

		Representative of the University of Belgrade Faculty of Organisational Science Representative of the University of Kragujevac Representative of the University of Nis Faculty of Electrical Engineering Vesna Spasojević-Brkić Interpreter	
16:15-16:25	Discussion among panel members		
16:25-17:010	Meeting with the Ministry of Education, Science and Technological Development	Mladen Šarčević, minister Prof Ana Langović, state secretary Prof. Viktor Nedović, ministry assistant for European integration	Overall strategic issues behind the new law and its implementation so far; appointment of the Managing Board; independence (ESG 3.3) and funding (ESG 3.5); thematic analyses (ESG 3.4), cyclical reviews (3.7)
17:10	Wrap-up meeting among panel members		

11.10.2019			
09:00-9:45	Meeting among panel members to agree issues to be clarified		
09:45-10:45	Meeting with the CAQA Chairman and NEAQA Director (or the Self-Assessment Report Working Group) to clarify any pending issues	Prof Ana Šljacki Prof Jelena Kočović Interpreter	Outstanding issues
10:45-12:15	Private meeting among panel members to agree on the main findings		
12:15-12:45	Final meeting with to inform about preliminary findings (max. 12 participants, as chosen by the Agency)	Prof Sima Avramović Prof Slobodan Unković Prof Jelena Kočović	Preliminary findings of the review

		Prof Ana Šijački Prof Biljana Jovanovic Gavrilovic Prof. Vesna Djukić interpeter Ana Jakovljevic Aca Jović	
12:45	Lunch and departure of the panel members		

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

May 2019

1. Background and context

The National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA) is an independent agency in Serbia, established in 2018, for the purpose of quality enhancement of higher education institutions and study programs. According to the previous Law on Education the Commission for Accreditation and Quality Assurance (CAQA) was founded in 2006 as the central body for accreditation and quality assurance in Serbia until the new Law of Education of 2017. NEAQA provides the legal, institutional, substantial and functional continuity with the previous institution. As a new independent legal entity NEAQA is consisted of Managing Board, Director, Commission for Accreditation and Quality Assurance (CAQA), and Professional and Administrative Service.

By virtue of the Law of Higher Education NEAQA is responsible for performing the accreditation tasks, the assessment of quality of higher education institutions and the units therein, evaluation of study programs and assurance of quality in higher education. In realizing those goals CAQA is an expert / professional body of NEAQA who decides on the requests for accreditation, conducts the accreditation procedure and the procedure of external quality evaluation upon opinion of five peer review experts. The Director of the NEAQA appoints peer -review experts upon the proposal by CAQA.

Working plan of NEAQA is focused on promotion of higher education in Serbia through ensuring its compliance with the internationally recognized accreditation and quality assurance standards. The planned activities will be performed in the process of accreditation and quality assurance in accordance with the quality principles in the European Higher Education Area (EHEA), the European Standards and Guidelines (ESG) and the regulations in the Republic of Serbia.

In the process of preparation for the new cycle of accreditation, new procedures were adopted and published on 28 February 2019 in accordance with the requirements of ESG and the Law on higher education of the Republic of Serbia. The new procedure changed the accreditation system regarding the role of the peer reviewers, as suggested by ENQA and EQAR report about CAQA/NEAQA. The new CAQA had to review around 350 requests for accreditation which were left from the previous CAQA. During this process CAQA has noted numerous and various shortcomings, informed the academic community about these findings and established cooperation with it in order to overcome the

shortcomings. CAQA informed the National Council for Higher Education¹ (NCHE) about the shortage of international peer-reviewers necessary for the review of Ph.D. study programmes and NCHE decided to keep the call for experts open constantly. Moreover, the members of NCHE and CAQA took the obligation to spread the information about the call among the international academic community. The call is published on NCHE website in two languages: Serbian and English.

NEAQA has been ENQA member under review since 22 February 2018 (the predecessor organization CAQA - Commission for Accreditation and Quality Assurance) and is now applying for ENQA membership. The review will also be used for the agency's application for registration on the European Quality Assurance Register for Higher Education (EQAR).

2. Purpose and scope of the evaluation

This review will evaluate the way in which and to what extent NEAQA fulfils the requirements of *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of NEAQA should be confirmed and to EQAR to support NEAQA application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of NEAQA within the scope of the ESG

In order for NEAQA to apply for ENQA membership and for registration in EQAR, this review will analyse all NEAQA activities that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of NEAQA have to be addressed in the external review:

- Accreditation on Higher Education Institutions
- Accreditation of Study Programmes
- External quality evaluation
- Initial accreditation of HEIs and study programmes

3. The review process

The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

¹ In charge for the creation of the list of peer reviewers

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference for the review;
- Nomination and appointment of the review panel;
- Self-assessment by NEAQA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to NEAQA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the Chair of the review panel, and another member as a review Secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide NEAQA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards NEAQA review.

3.2 Self-assessment by NEAQA, including the preparation of a self-assessment report

NEAQA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current

situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NEAQA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draw up a draft proposal of the schedule for the site visit to be submitted to the agency at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule shall be given to NEAQA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NEAQA in arriving in Belgrade, Serbia.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency, or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review Secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to NEAQA within 10 weeks of the site visit for comment on factual accuracy. If NEAQA chooses to provide a statement in reference to the draft report it will be submitted to the Chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by NEAQA, will finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

For the purpose of applying for ENQA membership, NEAQA is also requested to provide a letter addressed to the ENQA Board outlining its motivation to apply for membership and the ways in which NEAQA expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the ENQA Board, together with the final evaluation report, when deciding on the agency's membership.

4. Follow-up process and publication of the report

NEAQA will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. NEAQA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge to NEAQA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgement of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether NEAQA is in compliance with the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR and is designed to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to NEAQA and ENQA and until it is approved by the Board the report may not be used or relied upon by NEAQA, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. NEAQA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NEAQA shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for progress visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses progress visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, NEAQA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NEAQA if the travel and subsistence expenses go under budget.

It is understood that the fee of the progress visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative schedule of the review

Agreement on terms of reference	March 2019
Appointment of review panel members	Late March/beginning of April 2019
Self-assessment completed	31 May 2019
Pre-screening of SAR by ENQA coordinator	June 2019
Preparation of site visit schedule and indicative timetable	July 2019
Briefing of review panel members	August 2019
Review panel site visit	Late September/ beginning of October 2019
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	Mid-November 2019

Draft of evaluation report to NEAQA	End-November 2019
Statement of NEAQA to review panel (if necessary)	December 2019
Submission of final report to ENQA	Early-January 2020
Consideration of the report by ENQA Board	February 2020
Publication of the report	March 2020

ANNEX 3: GLOSSARY

CAASS	Conference of Academies of Applied Studies and Colleges of Academic Studies
CAQA	Commission for Accreditation and Quality Assurance
CONUS	Conference of Universities
ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
LoHE	Law on Higher Education
	Ministry of Education, Science and Technological Development
NCHE	National Council for Higher Education
NEAQA	National Entity for Accreditation and Quality Assurance in Higher Education
QA	quality assurance
SAR	self-assessment report
SCAASS	Student Conference of Academies of Applied Studies and Colleges of Academic Studies
SCONUS	Student Conference of Universities
ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NEAQA

- 2018 Financial Report and 2019 Financial Plan
- 2019 SAR
- CAQA Rules of Procedure, 2019
- Decision on the Establishment of NEAQA, 2018
- Draft questionnaire for review panels and reviewed HEIs (in Serbian)
- Law on Higher Education
- List of reviewers and breakdown according to gender
- NEAQA 2019-2022 Strategy
- NEAQA Code of Ethics, 2018
- NEAQA Statute, 2018
- Regulations on Standards and Procedures for Accreditation of Higher Education Institutions, 2019
- Regulations on Standards and Procedures for Accreditation of Study Programmes, 2019
- Regulations on Standards for Initial Accreditation of Higher Education Institutions and Study Programmes, 2019
- Rulebook on Standards and Procedure for External Quality Control of Higher Education Institutions (Audit), 2019
- Rulebook on Standards and Procedure for Self-Evaluation of Higher Education Institutions, 2019
- Sample of a site visit protocol
- Sample of reports from new and old procedures – except audit - in Serbian, with summaries in English
- Summary of Accreditation Outcomes, 2018 (in Serbian)

OTHER SOURCES USED BY THE REVIEW PANEL

- CAQA 2017 SAR with Annexes and Review Report
- NCHE Appeals Procedure, 2018 (in Serbian)
- NCHE Rules of Procedure, 2019 (in Serbian)



THIS REPORT presents findings of the ENQA Agency Review of the National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA), undertaken in 2019.



2020 ENQA AGENCY REVIEW