TURKISH HIGHER EDUCATION QUALITY COUNCIL (THEQC)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Higher Education Quality Council of Turkey (THEQC) with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) parts 2 and 3. The report is based on an ENQA coordinated peer review. Based on this report THEQC will apply for membership of ENQA and registration on the European Register for Quality Assurance Agencies (EQAR). The site visit of the peer review panel in charge of the evaluation took place between December 9 and 12 2019.

THEQC was established in 2017, as a result of the reorganization and renaming of the Higher Education Quality Board, under the regulation issued in 1st of July 2017. Presently, THEQC is the only national body responsible for quality assurance in the Turkish Higher Education System.

The agency performs different quality assurance activities, varying from those carried out periodically, such as external evaluation of Turkish higher education institutions or authorization and recognition of independent accreditation agencies, to one-event activities commissioned by the government body responsible for higher education, i.e. English preparatory schools external evaluation and evaluation of HEIs within the 'mission differentiation and specialization project'. According to the Terms of Reference for this review, the panel has analysed the institutional external evaluation of HEIs (based on Institutional Feedback Reports), including annual monitoring of internal quality assurance activity of HEIs (based on Institutional Self-Evaluation Reports). The panel views on the scope of the review are presented under the Introduction of this report.

The opinion of the panel is that the agency fully complies with ESG 3.2, 3.4 and 3.7, substantially complies with ESG 2.1, 2.2, 2.3, 2.4, 2.5, 3.1, 3.6 and partially complies with ESG 2.6, 2.7, 3.3 and 3.5.

<u>Overarching recommendations</u>

As the review panel began to reach its conclusions, it became clear that there were a number of overarching recommendations that it wished to make, under which all other recommendations, related to specific standards would sit. These overarching recommendations are, therefore, relevant to a number of the standards in parts 2 and 3 of the ESG. The panel felt that it was important to set out these recommendations at the front of the report, along with a contextual statement:

All recommendations and suggestions are made in the context of recognizing the work that THEQC has done to build capacity and a quality culture across the Turkish higher education sector. They are intended to assist THEQC as it moves to the next stage of its development and towards an institutional accreditation process.

- As it moves towards an institutional accreditation process, THEQC will recognize the impact that this will have on its operations and outcomes. The panel recommends, therefore, that the agency carefully consider all of its processes, procedures, criteria and outcomes in a systematic way in order to facilitate successful transition to institutional accreditation. (THEQC will want to communicate with universities about the changes that institutional accreditation will bring).

- It is important for a quality assurance agency to build its own capacity and expertise as the national quality assurance (QA) body. There will always be movement of staff between universities and agencies but, except for short-term projects, expertise should lie with agency staff to allow universities to be real stakeholders. The current situation impacts on the operational independence of the agency; therefore, the balance between permanent staff who

are on the payroll of the agency and those who work as consultants/advisors/experts, and who are paid by their home university, should change.

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

– The review panel recognises that the current strategic plan is the agency's first. It recommends that, in future, the strategic planning process should incorporate all of the agency's functions including, for example, programme of thematic publications; budget and finance planning; staff development and internal quality assurance.

The panel made a set of recommendations under the following standards: 3.1, 3.3., 3.5, 3.6, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7.

At the same time, commendations have been made under the standards: 3.1, 3.4, 3.6, 2.2, 2.3, 2.4, 2.6.

INTRODUCTION

This report analyses the compliance of Higher Education Quality Council of Turkey, THEQC with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in the period from October 2019 to January 2020.

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.

As this is THEQC's first external review, the panel is expected to pay particular attention to the policies, procedures, and criteria in place, being aware that full evidence of concrete results in all areas may not be available at this stage.

REVIEW PROCESS

The 2019 external review of THEQC 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 THEQC was appointed by ENQA and composed of the following members:

- Fiona Crozier (Chair - ENQA nominee) Independent, former Head of International, Quality Assurance Agency for Higher Education (QAA), UK;
- Simona Lache (Secretary - EUA nominee), Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania;
- Luis Carlos Velón Sixto (ENQA nominee), Internal and External Quality Manager, Agency for Quality Assurance in the Galician University System, Spain;
- Ignas Gaižiūnas (ESU nominee), Member of the European Students' Union Quality Assurance Student Experts Pool, student in Theoretical Physics and Astrophysics, Vilnius University, Lithuania.

Goran Dakovic, reviews manager at ENQA, acted as review coordinator.

THEQC produced a self-assessment report (SAR) which provided the basis for the evidence that the panel used to draw its conclusions. Panel members received the SAR from THEQC via ENQA in October 2019 and began to analyse its contents against the ESG. In November 2019 the ENQA coordinator facilitated a web-based teleconference which enabled the panel to discuss the SAR and practical aspects of the review including the schedule of meetings for the site visit, and to request additional information. The panel conducted a site visit to THEQC from 9th-12th December 2019 in order to further examine both the claims made in the self-assessment and the evidence provided. The panel was also able to clarify any points at issue. During the site visit, translation was provided by a professional approved in advance by ENQA. Finally, the review panel produced this report based on the SAR, site visit, additional evidence and its findings. In doing so, it provided an opportunity for THEQC to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review.

SCOPE OF THE REVIEW

European Quality Assurance Register

The panel was cognisant, from the beginning of the review process, of the letter of eligibility sent by the European Register for Quality Assurance (EQAR) and the parameters it set for the scope of the review. This report deals with each of those aspects below:

Deemed to be within scope:

- Institutional external evaluation (IEE) including the annual monitoring of internal quality assurance activity of HEIs.

This is dealt with in full in this report.

- English preparatory schools (EPSs) external evaluation.

EQAR considered this to be within the scope of the ESG, *"… as the English preparatory schools are part of a higher education degree and the external evaluation follows predefined processes and criteria (Fields and Minimum Assessment Criteria) addressing teaching and learning in higher education".*

During the course of the site visit, the following became apparent:

- The EPS sit within universities.

- Students while studying at EPS retain their legal student status when studying on an EPS course.

- However, EPS courses are not considered as higher education; this was confirmed to the review panel by the representatives of the ministry.

- Students enrolled by an institution on certain programmes that have an element of the programme that is taught in English must pass the EPS language proficiency test (this is similar to IELTS).

- They may not progress to study on their programme unless they have passed this test. They have three opportunities to pass the test (an initial test and two resits).

- The test is solely to do with English proficiency. It has nothing to do with the content or learning outcomes of the programme on which the student is enrolled and the marks they receive in the EPS test do not contribute anything towards their programme of study or its assessment. EPS is, in effect, an entrance test.

- The process was a one-off event to respond to some complaints about the operation of the test. There is no intention to repeat it at the moment.

For these reasons, the review panel did not pursue EPS as one of the activities within the scope of the review. It can, however, report that the evaluation process for EPS (required, designed and owned by the Council of Higher Education - CoHE) is a pilot study against THEQC's criteria and those institutions that participated were volunteers.

- Mentorship programme.

The agency's definition of 'mentor' is that of someone from the Council who is assigned to a particular institution before and during its evaluation to answer any questions about, for example, the drafting of the ISER or site-visit protocols. The mentors will not have any affiliation with the institution to which they are assigned and will not have anything to do with the evaluation team. Mentors have, thus far, played an important role in THEQC's work to develop the capacity of Turkish HEIs to develop their internal quality assurance systems and also a quality culture that is visible at sector level as well as at institutional level (see commendations).

However, see also the Recommendations, which include detail on developing the capacity of

the permanent agency staff, as opposed to relying on consultants and experts from HEIs. One of the reasons for this recommendation was to avoid future conflicts of interest as the agency moves towards an institutional accreditation process. As the Turkish HE sector becomes more familiar with external evaluation and accreditation, the panel would suggest that this mentorship programme might evolve into something appropriate for a more embedded relationship between the agency and the sector.

For the moment, there is evidence that the mentors do not interfere in an institution's evaluation. Their role is to provide support in explaining the evaluation process.

- Annual situation report of the higher education system in Turkey.

This activity is dealt with in full under standard 3.4.

- Reviews of HEIs within the "mission differentiation and specialization project" of CoHE.

The "mission differentiation and specialization project" belongs to CoHE. The methodology is the same as the one applied to regular institutional external evaluations; a set of additional sub-criteria or performance indicators is added to the criteria related to the special focus (i.e. mission differentiation or specialization). Those evaluators who are assigned to such an evaluation are briefed on the project. However, due to the fact that there are no additional evaluation criteria, evaluators wait until they have written the final report for THEQC and then extract the relevant, focused information and put this into a separate report to CoHE. There is no additional material. This separate report is not published by THEQC because it does not contain any different information to that which is in the Institutional Feedback Reports (IFRs). Additional information is provided in this report, where appropriate, under the relevant standards.

- Authorization and recognition of independent accreditation agencies.

The process for authorizing Turkish accreditation agencies uses the ESG as its criteria, as does the recognition process for agencies that are not Turkish. In the latter case, all three of the international agencies that have been recognized are registered on EQAR. Further detail is to be found under the relevant standards.

SELF-ASSESSMENT REPORT

The self-assessment report explained, from the beginning, that 'improving the international recognition by getting ENQA membership' is 'one of the primary institutional goals of the THEQC'. It also provided the context on the Turkish higher education system, on THEQC creation, structure and activities and underlined the agency's commitment to complying with each of the European Standards and Guidelines.

The SAR was developed by a group consisting of Council members, consultants and experts working with the agency, at the same time as the development of THEQC's strategic plan. The panel learned that stakeholders were involved in the self-assessment process by offering feedback collected via surveys and thereby helped to define the agency's vision and mission.

The review team found the SAR to be mainly descriptive rather than analytical, although it does include a reflective SWOT.

SITE VISIT

The site visit took place at THEQC premises in Ankara, from December 9 to December 12, 2019, according to the visit schedule previously agreed with the agency (Annex 1). The visit was well planned and organized, so that the review team was able to meet and interview the President of THEQC,

representatives from the Council and from different commissions of THEQC's structure (e.g. the Institutional External Evaluation Commission, the Recognition and Authorization of External Evaluation and Accreditation Agencies Commission, the Publicity and Stakeholder Relations Commission), representatives of ministry, heads and QA officers from HEIs and External evaluation agencies, members of the evaluators' pool - including students and employer representatives. The discussions in these meetings were triangulated with the self-assessment report and the documentary evidence provided by the agency during the visit, allowing the panel to arrive at the findings and judgements presented in this report.

The panel wishes to express its thanks to all those who gave up their time to meet it and to help it to enhance its understanding of THEQC and the contexts within which it operates.

At the end of the site visit, the panel held an internal meeting where it agreed on the preliminary conclusions relating to the level of compliance of THEQC on each of the standards in part 2 and 3 of the ESG. All the review panel members contributed to the report, which was drafted by the secretary of the panel and circulated among the panel for final revision. The draft report was submitted to THEQC for factual check in February 2020 after which it was finalised.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The higher education system in Turkey is regulated through two senior bodies: the Council of Higher Education (CoHE) and the Inter-University Council (ÜAK), as described in the national legislation (Law No. 2547 on Higher Education and Law No. 2809 on the Organization of Higher Education Institutions).

The system includes universities (public – 'state' and private – 'foundations') and foundational vocational schools of higher education. According to the SAR (page 7), in the academic year 2018-2019 there were 207 HEIs in Turkey: 129 state universities, 73 foundation universities and 5 foundational vocational schools of higher education, which offered 26,198 bachelor programmes, 12,628 master's programmes and 5,539 doctoral programmes.

The Turkish system is structured according to the Bologna process, in three cycles: bachelor (240 ECTS), master (90-120 ECTS) and doctoral (180-240 ECTS). In addition, HEIs also offer associate programmes (120 ECTS) corresponding to the short cycle (QF-EHEA) or 5th level (EQF-LLL). Student entry to higher education is regulated through a nationally centralized structure (ÖSYM - The Measuring, Selection and Placement Centre of Turkey); the acceptance to programmes taught in English is on condition of certified language competences.

The total number of students enrolled in 2018-2019 was 7,740,502, out of which a majority (7,134,674) were studying in state universities and 595,116 in foundation universities. The distribution of students on different cycles is presented in Table 1.

Table 1. Distribution of students on cycles in the Turkish higher education system

Total number of students	Students on associate degrees	Students on bachelor's degrees	Students on master's degrees	Students on doctoral degrees
7,740,502	2,829,430	4,420,699	394,174	96,199

According to the presentation provided to the panel by the president of THEQC, 168,200 academic staff (64% male and 36% female) work in Turkish HEIs.

QUALITY ASSURANCE

Some of activities related to quality assurance in higher education in Turkey have been carried out since the '90s but they coalesced in a systematic approach in 2005, when the Commission for Academic Assessment and Quality Improvement in Higher Education (YÖDEK) was established, within the CoHE. At the same time, the HEIs were required to set-up Academic Evaluation and Quality Improvement Boards (ADEK), aiming to evaluate the institutions' quality processes annually and to submit the reports to YÖDEK.

In Turkey there are no regulations for compulsory accreditation of higher education institutions or of programmes they provide. However, during the interviews, the panel learned that accredited programmes are better positioned in the national rankings and were preferred by prospective students. Thus, since 2002, a considerable number of accreditation agencies have operated at programme level and the number of accredited programs has increased over the years (e.g. from 5.56% in 2016 to 7.37% in 2019).

At the same time, the current regulations require that all HEIs should submit annual self-evaluation reports to the THEQC and be subjected to external evaluation by THEQC every five years.

HIGHER EDUCATION QUALITY COUNCIL OF TURKEY - THEQC

THEQC was established in 2017, as a result of the reorganization and renaming of the Higher Education Quality Board, under the regulation issued in 1st of July 2017.

The Higher Education Quality Board was established in 2015 under the auspices of the Higher Education Quality Assurance Regulation. Although considered independent in its formal decisions, the Board operated under CoHE. In 2017, this structure became the Higher Education Quality Council (THEQC), intended as an independent organization. Presently, THEQC is the only national body responsible for quality assurance in the Turkish Higher Education System, holding as primary duties:

- External evaluation of HEIs;
- Authorization of national and recognition of international accreditation agencies;
- Dissemination of quality assurance culture in HEIs.

THEQC'S ORGANISATION/STRUCTURE

Organisationally, THEQC consists of the Council and the General Secretariat (SAR, page 13).

The Council has 13 members, representing the main stakeholders, one of which is student and one labour market representative. It is led by a President and a Vice-President, both of which are full-time and which are elected from among the Council members for a period of four years. The Council has established three commissions and assigned an Advisory Board to assist it in performing its duties. The three commissions are structured according to the agency's main tasks: (1) Institutional External Evaluation Commission; (2) Recognition and Authorization of External Evaluation and Accreditation Agencies Commission; (3) Publicity and Stakeholder Relations Commission. While the commissions involve Council members, the Advisory Board consists of experienced and reputed professors, with extensive expertise in higher education and quality assurance.

The General Secretariat carries out the administrative operations of the agency. It comprises three units: (1) Institutional External Evaluation and External Evaluation Agencies Registry Unit, (2) Publicity and Stakeholder Relations Unit and (3) Administrative Services Unit. It is coordinated by the Secretary General, as head of the administrative structure of THEQC, accountable to the President. These units are formed mainly by staff assigned from HEIs on a full-time basis (called 'experts') or part-time basis (called 'consultants').

THEQC'S FUNCTIONS, ACTIVITIES, PROCEDURES

According to the Regulation on Higher Education Quality Assurance and the Higher Education Quality Council (art. 6, page 5-6), the functions of the Council are the following:

- To define national policies and strategies for quality assurance in higher education system and publicly announce them;
- To organize activities for the improvement and dissemination of quality culture in higher education system;
- To support building internal quality assurance systems in higher education institutions and provide higher education institutions with guidance on the issue;
- To monitor activities regarding quality assurance systems in higher education at national and international level, and organize joint activities at national and international level;
- To set out the principles, quality indicators and rules applied in external evaluation and accreditation;
- To conduct an external evaluation of higher education institutions regarding the quality levels of their learning and teaching, research and development, social contribution and administrative services at least once every five years and evaluate higher education programs when deemed necessary;
- To evaluate and monitor activities of the higher education institutions within the mission differentiation and specialization program and submit their results to the Council of Higher Education;
- To organize activities and issue publications for informing higher education institutions on the procedures to be applied in external evaluation and accreditation;
- To annually prepare and publish Higher Education Evaluation and Quality Assurance Annual Situation Report that comprises recommendations for quality enhancement by evaluating the institutional feedback reports in the aftermath of the external evaluation process of higher education institutions, and submit it for the relevant stakeholders' information, including the Council of Higher Education;
- To issue decisions by examining registration applications of private law legal persons applying to the Council to become registered for carrying out activities in the areas of external evaluation and accreditation within the framework of the set principles and rules; to monitor the activities of the organizations and obtain information, issue warnings, or terminate their registration when deemed necessary;
- To represent Turkey in international organizations for quality assurance in higher education;
- To cooperate with Turkish Qualifications Framework Committee on subjects pertinent to quality assurance system in higher education;
- To evaluate the application levels of the provisions within "the Rules and Procedures on Quality Assurance of Qualifications within Turkish Qualifications Framework" in higher education institutions.

The activities of THEQC are grouped in four categories (SAR, page 21):

1. Establishment of internal and external QA mechanisms in higher education system and ensuring their effectiveness;
2. Evaluating the quality of HEIs' learning and teaching, research and development, and governance system in accordance with the national and international quality standards;
3. Recognition and authorization of independent external evaluation and accreditation agencies;
4. Internalization and dissemination of QA culture in higher education system.

The first two categories are implemented via two main processes:

- **Annual monitoring of internal quality assurance activity of HEIs**, based on Institutional Self-Evaluation Reports (ISERs). ISERs are developed according to the *THEQC Institutional Self-Evaluation Report Writing Guide* (Annex 8 of SAR), following the quality criteria established by THEQC.

- **Institutional external evaluation (IEE) of HEIs**, carried out at least once every five years for each HEI (SAR, page 21) and concluding with a published Institutional Feedback Report (IFR). The process is described in the *THEQC External Evaluation Guide* (Annex 7 of SAR) and follows the same quality criteria as the ones used for annual monitoring of HEIs.

In relation to these processes, THEQC has developed other activities, which also help in implementing the fourth activity mentioned above:

- **Mentorship programme**: a guidance service offered by THEQC to HEIs subject to external evaluation, assisting them in all the issues related to the process, for example how to write the ISERs or how to prepare for the different stages of the site visit, etc. (SAR, page 20, 45).

- **Annual situation report** of the higher education system in Turkey: which is elaborated based on the analysis of IFRs of the evaluated institutions from the current year, ISERs submitted annually by all HEIs and the opinions collected from relevant stakeholders (SAR, page 57).

Regarding the third activity:

- **Authorization and recognition of independent accreditation agencies** operating or planning to operate in Turkey for accrediting study programmes. The process is described in the *THEQC Guide for the Accreditation and Recognition of External Evaluation and Accreditation Agencies* (Annex 10 of SAR) and it is based on separate sets of criteria applied to Turkish and international agencies. The Turkish agencies are 'authorized' based on an extensive set of criteria developed by THEQC (including the ESG), while the international agencies are 'recognized' based on two criteria: compliance with ESGs and accreditation using an output-oriented approach.

Besides the activities presented above, two others should be mentioned, although they are not continuously performed by THEQC but are 'one-off' projects commissioned by CoHE:

- **English preparatory schools (EPSs) external evaluation**: the process has been developed on-demand of CoHE, since there is no national independent accreditation agency operating in the field of foreign language education. A need for EPSs' quality improvement was identified, following feedback from different stakeholders. The evaluation is performed on a voluntary basis and consists of a peer evaluation process based on a set of criteria and guidelines (SAR, page 18, Annex 10 of SAR).

- **Evaluation of HEIs within the 'mission differentiation and specialization project'**: as mentioned above under Scope of Review, THEQC also carried out this process as required by CoHE, with special focus on research development (applied to 15 state universities) and on regional development (applied to 10 state universities). CoHE used the external evaluation results to allocate appropriate funding and to support those universities (SAR, page 17).

The SAR also presents some actions taken by THEQC in the field of internationalization; strengthening the recognition of the agency 'by increasing the internationalization level' is part of the strategic plan (e.g. developing cooperation with the French Higher Education Evaluation Council - HCERES and UK Quality Assurance Agency for Higher Education - QAA; organizing meetings with international accreditation agencies operating in Turkey: Association to Advance Collegiate Schools of Business -

AACSB, Agency for Quality Assurance - AQAS, Foundation for International Business Administration Accreditation - FIBAA).

THEQC's FUNDING

THEQC's income is principally made up of state funding provided under the Central Government Budget Law. The agency does not charge fees from HEIs or accreditation agencies for the evaluations performed. Although it is allowed to use other funding sources (e.g. donations, financial aids, other revenues), according to the SAR, this has not been the case up until now.

THEQC's budget was of 3.143.000 TL in 2018, but only 1.572.000 TL was spent (~50%). In 2019, the budget received was of 6.348.000 TL and the estimated expenditure until the end of the year was of 4.450.000 TL (~70%). The main part of the expenditure goes, every year, on staff costs and purchase of goods and services. Except for Council members who receive a meeting allowance for attending Council meetings, and the president and vice-president, who are employed full-time, most of the agency's staff (experts and consultants) are assigned by HEIs and are not paid by THEQC. The same goes for the evaluators: they carry out external reviews without being paid, and the travel expenses are covered by the institutions subjected to evaluation.

FINDINGS: COMPLIANCE OF THEQC 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.

Evidence

THEQC is the agency responsible, by law, for the implementation of quality assurance in Turkey's higher education system.

The development of external quality assurance activities is clearly stated in the relevant regulation (i.e. Regulation No. 30604 on Higher Education Quality Assurance and the Higher Education Quality Council published on 23 November 2018) as being among the duties of the agency. As a result, the main activity areas of THEQC in the field of quality assurance are the following:

- Conducting institutional external evaluation of HEIs;
- Performing the authorization and recognition processes of accreditation agencies;
- Ensuring the internalization and dissemination of QA culture in HEIs.

THEQC also carries out additional activities such as providing guidance services (mentorship programme, information portal), publishing reports (Annual Situation Report) and organizing events (feedback meetings, training, etc.) as well other activities requested by stakeholders (e.g. evaluation of HEIs within "mission differentiation and specialization project" and external evaluation of EPSs).

All these activities are described in detail within the SAR and annexes; their information and usefulness were verified by the panel during the interviews with the stakeholders. The panel found that the main activity of the agency, in terms of resources and time allocation, has been until now the Institutional external evaluation (IEE) of higher education institutions. It is worth highlighting that all HEIs in Turkey, mature enough to have graduates, have already participated in such an evaluation process.

During interviews with representatives of universities and other stakeholders, the panel was assured that THEQC activities are well known and perceived as tools for improvement. The attendees also emphasized the role of THEQC in fostering a quality culture in the Turkish higher education system.

During meetings with THEQC, the panel found that the agency was planning to move very soon from institutional external evaluation to institutional external accreditation. During the meeting with the representatives from the Institutional External Evaluation Commission, the panel was told about a pilot project to be launched in 2020 in order to test the process in view of future implementation.

The THEQC's mission, vision, core values, institutional policies and strategic objectives are publicly available on its website and are within the scope of the strategic plan 2019-2023. The strategic plan was developed in parallel with the self-assessment process. It includes all the activities of THEQC and is extremely relevant for the further development of the agency. Different stakeholders were involved

in its elaboration, such as Council members, staff, advisory board members, HEIs, ministry representatives etc. However, the participation of students was limited to the one student Council member. The panel could not identify any participation of international representatives.

The THEQC Council includes representatives of different stakeholders: HEIs, students, business sector, ministry and accreditation agencies. There are no representatives from outside Turkey in the Council. Although work of the Council is divided by the commissions, the student member is not a part of any Council commission. Also, the student is the only member appointed by the Council itself rather than by any student representative body. This is mainly due to the lack of a national student union in Turkey. An Advisory Board has been set up, composed of five academics from the Turkish higher education system, with extensive experience and good reputation. THEQC has also recently created a student commission with five members and the panel was able to see different dissemination and information activities carried out by that commission, with the support of the agency. The Student Commission currently consists of one student member of the Council; the other four members are student evaluators.

Analysis

Based on the evidence from the SAR, annexes and interviews mentioned above, it was clear to the panel that the external quality assurance activities of THEQC (mainly the IEE) have been taking place on a regular basis since the creation of the agency. The recent strategic plan 2019-2023 has had a positive impact on the development of THEQC and the mission, vision and core values are reflected in the agency's daily work. However, the plan does not refer to some relevant activities of the agency, such as staff training and development.

The representatives of HEIs and other relevant stakeholders who attended the interviews with the panel showed awareness and appreciation of the quality and value of the agency's activities.

The Advisory Board does not include students, representatives from the business sector or international representatives. Apart from a list of members, provided by the agency during the site visit, the panel could not find the composition and tasks of the Board in the agency's documentation or on its website.

Overall, the panel considers there is participation of students in the agency's activities, as they are represented in the Council and in the evaluation teams. Nevertheless, increasing the student involvement in other relevant processes of THEQC, for example when defining the strategic plan, would be an added value; the recently created Student Commission could have a positive role in achieving this. Regarding employer representatives and international experts, the panel learned that there is intention to involve them in the external evaluation process and encourages this initiative.

Panel commendations

- The panel commends the work done by THEQC so far, to create a quality culture in the Turkish HE system and in its HEIs, with the aim of embedding the ESG as the means for enhancement and improvement.
- The panel commends the recent creation of a student commission, which has already organised different dissemination and information activities, with the support of THEQC.

Panel recommendations

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

- The panel recommends including further information in the Strategic Plan such as: plan of publications (including thematic analyses) and the staff development plan.
- THEQC should publish the composition and tasks of the Advisory Board on its website.

Panel suggestions for further improvement

- THEQC might increase the information about the student commission on its website (e.g. commission's role, performed activities, etc.).
- THEQC could also consider the value of having international representation within its governance structure.

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 SAR states that THEQC was legally established within the scope of the Higher Education Quality Assurance Regulation of 23rd July 2015. On 1st July 2017, in accordance with the THEQC Establishment Law, the agency became an independent entity with public and legal recognition, administrative and financial autonomy and a centrally allocated budget. Its structure and activities, including the establishment of internal and external quality assurance systems, were also defined in the same regulation.

The Establishment Law and regulations make it clear that THEQC is the only national organisation in Turkey that is authorised to carry out its activities in relation to quality assurance in higher education.

Analysis

The panel was provided with the relevant legal documentation (laws, regulations and articles) in translation, which clearly corroborate the statements in the SAR. In particular, the Institutional external evaluation directive for the Council sets out the duties and authority of the Council in relation to that process, the training of evaluators, the requirement for student evaluators etc.

All those to whom the panel spoke, including ministry, HEI and labour market representatives were fully cognisant and supportive of THEQC's legal position as the sole quality assurance agency in Turkey.

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.

Evidence

As stated in the Law No. 2547 on Higher Education, Additional Article 35/ 18.06.2017, "the THEQC is a public legal entity with administrative and financial autonomy and special budget [...]". According

to the SAR (page 38), the agency "fulfils its duties and responsibilities without any influence or interference of public institutions, organizations or authorities, evaluated HEIs, authorized or recognized external evaluation and accreditation agencies and other stakeholders".

In accordance with the provisions of Article 5 of the Regulation No. 30604 of November 23, 2018 relative to Higher Education Quality Assurance and the THEQC, members of the Council cannot participate in meetings where issues related to institutions they represent or work for or are affiliated with, are discussed. The president and vice-president of the THEQC are elected with absolute majority of the total number of THEQC Council members. The only student representative of the Council is selected by the Council from a list of voluntary candidates that is provided by HEIs as there is no national student representative body currently in Turkey.

Although the budget is allocated yearly to the THEQC by the Turkish Government, during the discussion with the president, the panel learned that the agency has full autonomy in managing the budget according to its needs. The panel was also told that the finances are checked every year, through two financial audits. The Council is the body with full responsibility in the agency. The Council is responsible not only for matters of governance, but also for operational ones: e.g. selection of experts for evaluation teams, (including students), approval of external evaluation methodologies and guidelines, approval of reports, etc.

During the interviews the panel learned that, except for Council members who receive a meeting allowance for attending Council meetings, and the president and vice-president, who are employed full-time, most of the agency's staff (experts and consultants) are assigned by HEIs and are not paid by THEQC.The same applies to evaluation experts: they perform external reviews without being paid, and their travel expenses are covered by the institution at which they are carrying out the evaluation.

Analysis

The organisational independence is set out clearly in the relevant legislation for the agency, mentioned in the evidence section above. During the interviews, the panel did not detect any concerns in relation to this matter.

However, the current structure impacts on the independence of the operations and formal outcomes of the agency, since there is potential for conflicts of interest to arise regarding the Council members. This situation could become more relevant in the future, once the agency moves to institutional accreditation, where formal outcomes will be included in the process and published. The operational independence of the THEQC is not fully ensured due to the significant role played by experts and consultants who remain employed and salaried by HEIs in the daily work of the agency, as has already been described in this report. The panel also thinks that the process for the selection and appointment of students for the THEQC Council and evaluation teams is not sufficiently disseminated. At the meetings with the Council and the student representatives, students were unclear about the procedure for being included in the pool of experts or being selected as a student representative in the Council.Students were unclear as to what happened once they had submitted their CVs and the student member of Council did not know if his mandate could be renewed after one year.

It was clear to the panel that THEQC is fully independent in managing its budget. Equally the panel did not find any evidence that the agency's operational independence has been compromised in any way to date. However, as THEQC matures and as it moves to an institutional accreditation system, the panel's concerns remain that the current organisation and structure of the agency could lead to substantial problems in the field of independence in the future if they are not addressed.

Panel recommendations

- The review panel recommends that the agency reconsider its structure: an overarching and representative governing body would allow the agency to maintain the representation that it currently has in its staffing profile but this would be at the level of strategic overview. An executive arm, which manages the agency's operations and processes, might then be staffed by permanent appointments to THEQC.
- Related to the above, and in order to improve operational independence, the agency must continue to improve the balance between permanent staff who are on its payroll and those who work as consultants/advisors/experts. The current operational independence of the agency is not assured due to the presence of third parties in the daily job of the agency whose interests may be compromised due to conflicting loyalties related to involvement in the agency's operations.

Panel suggestions for further improvement

The panel suggests ensuring that the procedure for the selection of student members in THEQC bodies is clearly disseminated to students so that they understand how they are selected.

Panel conclusion: partially 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.

Evidence

The SAR states that the three main kinds of thematic reports published by THEQC are:

- The Annual Situation Report (ASR), which summarises and analyses activities undertaken by THEQC each year
- The Institutional Self-Evaluation Reports (ISERs) by HEIs and
- The Institutional Feedback Reports (IFRs) on each evaluation.

The Annual Situation Report (ASR) summarises and analyses all the ISERs and IFRs related to that year's evaluations. These are reviewed and the opinions of all relevant stakeholders sought for inclusion in the publication. This analysis of each of the criteria in the IEE process allows for a yearly snapshot of the understanding of and response to each of the themes and criteria in the IEE process. In this way, each ASR comprises a review of the preceding year. The reports are published on the agency's website.

In addition, in relation to the process for the Authorisation and Recognition of Accreditation Agencies, each accreditation agency provides THEQC with a report on its work at programme level over the year. This information is analysed and summarised by THEQC and the overarching report is provided to the Council of Higher Education. This report is published in September of each year and is followed by a meeting between THEQC and the authorised and recognised agencies to discuss and share the information. The information is also shared with the IEE Commission. This was the first year that this reporting process had been formalised.

In 2019 the agency also published the 'THEQC 2015-2019 Review Report.' This report provides an overview of the agency's activities and their outcomes to date.

The agency told the review panel of its plans to enrich its thematic reports in the future by adding further visuals and seeking to make them more comprehensible. It also aims to provide analyses specific to the different stakeholder groups.

Analysis

The review panel was able to read translations of the Annual Situation Reports and the 'THEQC 2015-2019 Review Report.' It was also able to read examples of ISERs and IFRs but did this in relation to other ESG standards - the panel does not believe that these constitute thematic analysis reports. Nevertheless, given that this is the agency's first review under the ESG and the comments that the panel makes about the ASRs below, it is clear that THEQC has an understanding of the value of thematic analyses. The outcomes of the ISERs and IFRs do permit the agency to produce statistical and other data but these are useful at the operational level and do not contain the analytical depth of the ASR.

The ASRs are produced by the agency after taking on board the views and opinions of all stakeholders that were involved in processes in the relevant year. These, added to the evidence from the processes themselves, lead to a rich and detailed report, which is informed by opinion and evidence. The reports are published on the THEQC website and are easily accessible.

It was clear to the panel from its interviews with various groups of stakeholders, that the Annual Situation Report is a valuable publication. HEIs in particular spoke of how useful they find the report, in particular its graphs and visual elements, which allow them to benchmark themselves against others in the sector.

The process for producing reports from the Authorisation and Recognition of Accreditation Agencies was confirmed by both those that provide the information and also the main recipient, CoHE. Information on the outcomes of the process are also published on THEQC's website. However, this is the first formal year of such reporting and the report was not yet finalised and published. The panel cannot, therefore, testify to its quality or usefulness.

The SAR states that one of the aims of the strategic plan for the agency is to provide more targeted reports for different groups of stakeholders. In discussion with the Publicity and Stakeholder Relations Unit, the review panel heard evidence of additional activities around the publication of thematic information. This is facilitated by the Information Portal, which provides various headings under which THEQC consultants and experts can draft and edit information. It was apparent that action is being taken to meet this target under strategic objective 3 in the Strategic Plan. However, the review panel believes that, at the moment, more planning would be beneficial to ensure maximum value for the workload and that, as well as having a target to produce more thematic reports, a strategic approach to doing so, including to the sharing of and responsibility for the workload, could be built into the strategic planning process.

Panel commendations

- The consistent production of a valuable annual publication that is informed by feedback and by evidence.

Panel suggestions for further improvement

- The panel suggests that the development of further thematic publications could be part of the strategic planning or annual monitoring process in order to ensure that the production of such publications each year is costed in terms of staff workload and that there is a strategic approach to the selection of topics.

Panel conclusion: fully compliant

ESG 3.5 RESOURCES

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

Evidence

Human resources

The SAR described only very briefly the THEQC staffing in terms of number and responsibilities, therefore the panel asked for additional information with regard to this issue. The additional evidence informed the panel that THEQC currently has 15 members of permanent staff across three areas: Institutional External Evaluation and External Evaluation Agencies Registry Unit - five employees, Publicity and Stakeholders Relations Unit - three employees and Administrative Services Unit - seven employees. Nine consultants are also working part time for THEQC (all of them being academics in Turkey and assigned by their HEIs to carry out activities within the agency) and they are principally responsible for the qualified and technical aspects of the evaluation activities, whereas the permanent staff mainly work in supporting and administrative roles.

The panel understood that, since the agency was only recently created (in 2017), the experience of the permanent staff in THEQC is limited; the majority of them were employed taking into account their previous background and experience, as was evident during the interviews and based on the information provided.

During the site visit, the agency provided the panel with a list of training activities attended by some staff members during 2019. These activities were intended mainly to provide development opportunities for staff in terms of knowledge and skills; however, there was no evidence of any methodical analysis of the kind of training needed by agency staff or of any planning for staff development. Rather the activities were offered on an 'ad hoc' basis.

Financial resources

The SAR states that operations of THEQC are largely funded by the Turkish Government. The THEQC budget has increased dramatically from 2018 to 2019 (100%, from 3.143.000 TL in 2018 to 6.348.000 TL in 2019). Although the agency carried out all of its planned activities in each of these years, approximately 50% of the budget, in 2018, and 30%, in 2019, remained unspent. The panel therefore considers that the assignation of the budget to the agency has not been carried out with due consideration of THEQC's Strategic Plan 2019-2023 and, therefore, its real financial needs.

The budget underspend is also impacted by the fact that, except for Council members, who receive a meeting allowance for attending Council meetings, and the president and vice-president, who are employed full-time, most of the agency's staff (experts and consultants) are assigned by HEIs and are not paid by THEQC. The same is true for the evaluators: they perform external reviews without being paid, and the travel expenses are covered by the institutions subjected to evaluation.

THEQC informed the panel during the visit that seven new positions are going to be added to the present quota of permanent staff, some of which will replace the posts currently filled by those assigned and paid by for by HEIs.

Other resources

The working environment of the agency is good and its premises are appropriate for the work that it does. The panel briefly visited the agency offices and saw the availability and distribution of space for the current staff.

The agency has developed digital tools, such as Quality Assurance Management Information System (QAMIS), Accreditation Agencies System (AAS) and Information Portal in order to have easier management of processes carried out by THEQC. Having been provided with a demonstration of these digital tools, the panel can confirm that they do indeed ensure the basis for efficient management of such processes (see also 2.3 and 3.6).

Analysis

Human resources

There is no doubt that, until now, all the agency´s activities have been carried out in an appropriate manner but with the crucial participation of third parties (e.g. experts, consultants and external evaluators). Taking into account all the relevant information gathered during the review process, it was clear to the panel that the currently the permanent staff mainly works in a support capacity whilst technical and professional tasks are the responsibility of the experts, consultants and external evaluators.

In that sense, the current 'voluntary' nature of the work of evaluators and staff of the agency (i.e. those that are employed and paid by their 'home' institution) has the potential to affect independence of the agency, as explained in part 3.3. Moreover, the sustainability of processes may be affected, as their development depends on non-permanent professional staff. This is expected to change in the future, especially considering the intention of moving from institutional external evaluation to institutional external accreditation.

In the light of this impending change, the panel believes that the development of an organizational chart with a clearer definition of responsibilities for all positions would be useful in ensuring the sustainability of the future work of the agency.

Financial resources

The panel considers that, so far, the agency's budget has been adequate for the development and implementation of its activities. At the same time, the panel was concerned that a large amount of the budget was not used, both in 2018 and 2019, suggesting that the budgeting process up to now has not been carried out with due consideration of THEQC's Strategic Plan and of its actual and planned activities and needs. The panel believes that it is important for the agency to demonstrate a stronger budgeting process as part of its strategic planning. The process should be subject to annual monitoring to ensure that it remains in a strong financial position regardless of external changes to its context.

Other resources

The current premises are adequate for the development of the agency's activities. Nevertheless, the panel encourages the agency to be mindful of ensuring an adequate working environment for all its employees if its permanent staffing should increase.

Panel recommendations

- The panel recommends that the agency continues to improve the balance between permanent staff who are on the payroll of the agency and those who work as consultants/advisors/experts. It is crucial for an agency to build its own capacity and expertise based on its own staff. A clear allocation of tasks and responsibilities in the permanent staff (functional profiles could be

useful) and the establishment of an overall staff development plan, including annual training programs, are seen by the panel as useful measures in this field.

- THEQC should strengthen the capacity of the core of professional permanent staff.
- In order to safeguard the future sustainability of the agency, the THEQC's budget should be planned and designed as part of the strategic planning process, taking into account previous year's expenditure and upcoming years planned activities. Annual monitoring of the strategic plan is important in this regard.

Panel suggestions for further improvement

- The panel suggests that the agency takes into consideration its premises as it plans to increase the number of permanent staff.

Panel conclusion: partially 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.

Evidence

In the SAR, the importance of agency's accountability towards different stakeholders is emphasized (e.g. page 53, 70). The internal QA system of the THEQC is based on the PDCA (Plan-Do-Check-Act) methodology, being developed in accordance with the 2019-2023 Strategic Plan. The mission, vision, core values, strategic objectives and quality policy are published on the THEQC website, both in Turkish and English. The THEQC's Quality Policy includes:

- To continuously improve services offered in line with the expectations of stakeholders.
- To provide an environment that will strengthen the quality culture inside and outside the Council.
- To ensure service quality through a strong internal quality assurance system.

The THEQC core values are the following: objectivity, transparency, ethical behaviour, independence, openness to collaboration, guidance, innovativeness and respect for diversity.

During the visit, the THEQC representatives explained the recent creation of the internal quality assurance system, in line with the results of the PDCA methodology and the 2019-2023 Strategic Plan. There is a schedule for gradually implementing performance indicators in all the relevant agency's processes.

THEQC has implemented a software tool for organising information on its internal quality assurance system. During the site visit the panel was able to see the operation of this application.

However, the panel could not identify, either through documents or during the interviews, a clear definition of responsibilities for internal quality assurance issues within the agency. The SAR states that the Council is mainly responsible for this topic, but there is no allocation of responsibilities for intermediate actions, such as gathering, organising and analysing the information needed to ensure internal quality of processes.

In the SAR and during the site visit, the panel was able to observe the strong relationship between THEQC and its stakeholders, and the emphasis that the agency places on the importance of this

relationship. Face-to-face meetings are organised regularly by THEQC with relevant stakeholders in order to gather information for continuous improvement. There is also a systematic procedure for the use of satisfaction surveys. The panel also learned from stakeholders about the existence of a contact link on the agency's website where any feedback can be sent anonymously (i.e. to express satisfaction, request information, make a suggestion or a complaint, etc.).

In all its processes the agency applies the *THEQC Code of Ethics and the Statement of Confidentiality and Commitment* to the evaluators, employees and members, as the panel was able to see from the documents and the discussions with the representatives of the agency and external evaluators.

Analysis

Processes are clearly described for all activities of the agency, and there is a structure in place for assuring and enhancing the quality of its work. Performance indicators have been already defined for some, but not all the processes, so far. The panel is of the view that audits of the internal quality assurance system, carried out by experts in the field, might be useful to the agency in terms of commenting on its usefulness and visibility. Of course, the ENQA review process is one such external review but there may be other ways for the agency to receive feedback on its IQA system.

Although there is a clear description of processes, during the interviews the panel observed that there was some confusion amongst staff (experts, consultants and permanent staff) when explaining their tasks related to internal quality assurance. Therefore, the panel believes that a clarification of responsibilities within the staff (which may also include external evaluators), for the routine tasks in the internal quality assurance system, would assist in increasing the effectiveness of the system.

The active involvement of stakeholders in THEQC's activities was confirmed, not only through the evidence of meetings and surveys, but also through the interviews during the site visit. External stakeholders testified to action taken as a result of their feedback.

Regarding the contact link provided on the agency's website for anonymous feedback, it is clear, for the panel, that, whilst this is a useful function for allowing stakeholders to contact the agency, it is not, as was suggested by THEQC, a part of the complaints and appeals process (see 2.7 below for further information). The panel considers that removing the word 'appeal' in the title of the link would ensure a proper reflection of its content and function.

Panel commendations

- The panel commends the use of platforms and on-line tools for the implementation of the internal quality assurance system and the dissemination of relevant information.
- The panel commends the procedures in place for promoting stakeholders' participation in agency activities, such as regular face-to-face meetings and periodic surveys.

Panel recommendations

- THEQC should develop a clear definition of responsibilities for internal quality assurance issues within the agency, in order to improve its organization and effectiveness.
- THEQC should further use the data they have to really develop the agency's internal quality systems rather than just to comply with external feedback from different stakeholders (see also 2.2).
- The panel recommends a full implementation of the Internal Quality Assurance System, with the definition of indicators in all the agency's processes.

Panel suggestions for further improvement

- The panel suggests that the THEQC verifies regularly the effectiveness of its internal quality assurance system, both internally and externally, for example, by audits carried out by experts in the field or by other valid methods.

Panel conclusion: substantially 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

This was the first external review undertaken by THEQC. The panel notes that the agency had prepared thoroughly for the review and provided a full SAR together with documentary evidence in advance and during the site visit. It also ensured that the review schedule provided the panel with the opportunity to meet with all the relevant internal and external stakeholders.

Analysis

This was the agency's first ENQA review. The panel found the preparation for the review to be thorough and learned that THEQC plans to continue to be cyclically reviewed in the future for the purposes of ENQA membership and registration on EQAR.

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.

Evidence

Information in this standard covers the processes of institutional external evaluation and authorisation and recognition of external evaluation and accreditation agencies. Institutional external evaluation is the main process for the evaluation of HEIs in Turkey. This section does not deal with EPS. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

As stated in the SAR (page 12), THEQC aims to support the establishment of internal and external QA systems in HEIs by conducting institutional level external evaluation. In doing so, THEQC includes the consideration and inclusion of the ESG part 1 in the protocols and evaluation criteria of its activities. Table 2 shows the correspondence between the IEE criteria and ESG Part 1, as THEQC presented this information in the SAR (page 22).

Table 2. Correspondence between THEQC IEE Criteria and ESG Part 1

THEQC Institutional External Evaluation Criteria		ESG Part 1
1. Quality Assurance System	1.1. Quality Policy 1.2. Duties, Responsibilities and Activities of Higher Education Quality Commissions 1.3. Stakeholder Participation	1.1. Policy for Quality Assurance 1.10. Cyclical External Quality Assurance
2. Learning and Teaching	2.1. Design and Approval of Programs 2.2. Continuous Monitoring and Updating of Programs 2.3. Student-Centred Learning, Teaching and Evaluation 2.4. Student Admission, Progression, Recognition and Certification 2.5. Teaching Staff 2.6. Learning Resources, Accessibility and Supports	1.2. Design and Approval of Programmes 1.3. Student-Centred Learning, Teaching and Assessment 1.4. Student Admission, Progression, Recognition and Certification 1.5. Teaching Staff 1.6. Learning Resources and Student Support 1.9. On-Going Monitoring and Periodic Review of Programmes
3. Research and Development	3.1. Institution's Research Strategy and Objectives 3.2. Institution's Research Resources 3.3. Institution's Research Staff 3.4. Monitoring and Improving Institution's Research Performance	

4. Governance System	5.1. Structure of Management and Administrative Units 5.2. Resource Management 5.3. Information Management System 5.4. Quality of Outsourced Services 5.5. Efficiency and Accountability of Management, Public Information	1.7. Information Management 1.8. Public Information

According to the table, the agency has considered all the ESG part 1 in the IEE Criteria, making a special effort to help institutions with the development of their Internal Self Evaluation Reports (ISERs). These documents are the main information for Institutional external evaluation. At the time of the site visit, all the Turkish HEIs had been assessed once following the IEE process. However, the panel could not find any evidence of formal feedback to the HEIs on the ISERS.

The use of mentors in the first implementation of the IEE was considered extremely useful by stakeholders, who told the panel of the benefits during the site visit.

The SAR also states (page 12) that THEQC monitors the accreditation activities of national and international accreditation agencies operating in Turkey and conducts the processes of authorization and recognition of agencies. The agency has a guide for these processes (Annex 10) that includes criteria for authorization of national agencies and for recognition of international agencies, respectively. Acording to the *THEQC Guide for the Authorization and Recognition of External Evaluation and Accreditation Agencies*, the authorization of national agencies is based on a set of criteria that follow the ESG and the international agencies are recognized to operate in Turkey if they demonstrate that they align with ESG part 1. This was confirmed during the meetings with the representatives from the Recognition and Authorization of External Evaluation and Accreditation Agencies Commission and from the External Evaluation Agencies.

Analysis

The panel studied the protocols (guidelines) and criteria for the IEE process and compared them to the ESG mapping in the tables included in the SAR. The panel found evidence that the ESG part 1 are being used as a basis for THEQC IEE criteria. Institutions were also aware of the ESG part 1 and their role in the Turkish system.

The panel recognises the extent and value of the work carried out so far by the agency and its stakeholders within the Turkish higher education system. As already mentioned in this report under ESG 3.1, the panel commends the work done by THEQC so far, to create a quality culture in the Turkish HE system and in its HEIs, with the aim of embedding the ESG as the means for enhancement and improvement. However, the effectiveness of the HEIs' internal quality assurance processes has not been fully proven so far, due to the lack of formal feedback provided by THEQC on the ISERs produced by universities.

Only one round of institutional external evaluations has been carried out by THEQC to date, therefore the impact of the process is difficult to assess. However, providing systematic feedback to institutions is important, especially when moving to institutional accreditation (since this is THEQC's intention).

Therefore, the panel recommends that the agency continue with the systematic development of activities, focusing especially on providing feedback to universities, in order to increase the impact of the activities on the quality improvement of institutions.

Regarding the use of mentors, as the Turkish higher education sector becomes more accustomed to external evaluation and accreditation processes, the panel believes that this mentorship programme could evolve into something appropriate for a more embedded relationship between the agency and the sector, especially considering the expected shift towards the institutional accreditation and the need to ensure that any conflict of interest is avoided. A shift towards an increase in the expertise of permanent staff will also impact on the development of the mentorship programme.

The panel also studied the *THEQC Guide for the Authorization and Recognition of External Evaluation and Accreditation Agencies*. It found evidence that the authorization of national agencies is based on a set of criteria following the ESG, and the international agencies are recognized to operate in Turkey if the criteria used for programme accreditation are in line with the ESG part 1 and the evaluation approach is 'output oriented'. However, like for the IEE process (mentioned above), there is a lack of formal feedback provided by THEQC on the annual reports submitted by the external evaluation agencies, as it was understood during the panel's meeting with the representatives of those institutions. Therefore, the effectiveness of the agencies' internal quality assurance processes could not be proven within the panel's analysis.

Panel recommendations

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

Panel suggestions for further improvement

- The panel commends the mentorship initiative for helping universities in the first cycle of institutional external evaluation process. It suggests that THEQC now reconsider this programme and its focus and purpose in order to avoid possible conflicts of interest, especially when the IEE process moves to one of institutional accreditation.

Panel conclusion: substantially 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.

Evidence

Information in this standard covers the institutional external evaluation process. This section does not deal with EPS and the process for authorisation and recognition of external evaluation and accreditation agencies. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

The aim of the Institutional external evaluation, as core activity of THEQC, is *"to measure to what extent the institution realizes its defined mission, vision, and strategic objectives with a focus on continuous improvement"* and can be found in the IEE Guide (Annex 7 of SAR) - *THEQC Institutional External Evaluation Guide*. This guide and additional regulations regarding Institutional external evaluation are

approved by the THEQC Council. According to SAR (page 49) *"The methodology has been developed in consideration of national and international regulations"*.

The Council, which is a body including stakeholders from higher education sector, is responsible for designing the relevant documentation for Institutional external evaluation. Other stakeholders are involved in providing opinions and feedback both at meetings held by THEQC and through the provision on the website to offer feedback and suggestions. It was highlighted in almost all the meetings with internal and external stakeholders that THEQC collects and uses feedback from stakeholders to inform the improvement of its evaluation methodologies. During the site visit it was mentioned that HEIs can also send their suggestions by email or other informal means.

According to the IEE guide, Institutional external evaluation aims to "[…] measure to what extent the institution realises its defined mission, vision, and strategic objectives with a focus on continuous improvement". During the meetings with internal and external stakeholders it was stressed that Institutional external evaluation is intended for "evaluating in a friendly way" in order to foster quality culture development in the higher education institutions. In the meeting with the representatives of HEIs it was highlighted that external evaluation made quality and quality assurance a more relevant topic in Turkish universities. At the same time, it was mentioned that the process provided HEIs with the possibility for self-reflection and for clear identification of areas for improvement.

THEQC has also developed the *Institutional Self Evaluation Writing Guide* (Annex 8 of SAR) to help institutions in developing the Institutional Self Evaluation Report (ISER). In addition, to reduce the effort needed to produce the ISERs, a digital tool has been created and is now used by HEIs: QAMIS (Quality Assurance Management Information System) (more details under part 2.3).

Analysis

The panel believes that the methodology for Institutional external evaluation achieves the aims set for it to improve quality of HEIs. It is also in line with both THEQC mission *"To **strengthen the quality assurance system** in higher education in order **to contribute to the continuous development** of HEIs in Turkey and the achievement of universal qualifications by individuals"* and strategic plan's activity area, i.e. *"Establishing and supporting quality assurance systems in higher education institutions"*. Representatives of the HEIs stressed during the site visit that evaluation, *"really helps to look at that which has to be improved"*, *"helps to develop institution"* and *"puts quality at the centre of attention"*. This convinced the panel that the methodology achieves its aims. However, the panel has concerns that current methodology's approach of "friendly evaluation" might raise some difficulties when THEQC moves to institutional accreditation and external assessment will result in formal consequences for the HEIs. Therefore, it encourages THEQC to think about the future development of its relationship with HEIs in the future. This could be in in parallel with the development of the mentorship programme.

The methodology for the Institutional external evaluation is supplemented by the use of the software QAMIS as an information management system. QAMIS allows the easy upload of all the necessary information such as the ISER as well as additional documents, thus reducing the workload this process would involve. After a demonstration of QAMIS and following discussions with representatives of HEIs, external evaluators and the staff of THEQC, the review panel was convinced that, in this regard, THEQC has very effectively taken into account the workload and costs that evaluation places on HEIs.

THEQC makes considerable effort to gather feedback and opinions from stakeholders, not only on Institutional external evaluation but also on all of its activities including the ASRs, Authorization and recognition of independent accreditation agencies and the Mentorship programme, as well as the IEE process. Feedback and opinions of various stakeholders are carefully considered by THEQC, as the panel learned during the site visit. It was clear to the panel from the interviews it held with various

stakeholders that this results in an improved and accepted external evaluation process among stakeholders.

However, although stakeholders' feedback is instrumental in the revision and improvement of methodologies, the panel saw no evidence to suggest that this is also the case for their design. Following interviews with THEQC internal stakeholders, it was clear to the panel that the design of methodologies and other related documents is carried out only by the Council. Although Council consists of members representing different stakeholders, it is also true that Council is the key part of THEQC and, in essence, it is 'the agency'. As a result, the direct involvement of stakeholders in certain stages of designing of the methodologies as well as related documents would be beneficial. The involvement of stakeholders external to THEQC would potentially lead to an even wider acceptance of the designed documents and processes.

In particular, the panel believes that students are not as involved as they could be (see comments under 'additional observations' at the end of this report). It was explained to the panel by THEQC that students are involved through input of the student member of Council and student evaluators. However, the panel considers that involvement of students' unions of HEIs (as there is no national students' union, for now) would provide not only a fresh perspective on the methodologies but would result in more benefits to THEQC (more details under Additional observations).

Panel commendations

- The panel commends the way institutional external evaluations are achieving aims and objectives set to help improve internal quality assurance systems of HEIs.
- The stakeholders' contribution to continuous improvement of methodologies through various surveys applied to collect feedback is acknowledged and appreciated.

Panel recommendations

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

Panel conclusion: substantially 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

Evidence

Information in this standard covers the institutional external evaluation process. This section does not deal with EPS and the process for authorisation and recognition of external evaluation and accreditation agencies. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

The process of Institutional external evaluation conducted by THEQC is described in the IEE Guide, publicly accessible on THEQC website. The guide includes a description and explanation of the process and its procedures. The process is carried out by a peer-review team of external evaluators (evaluation team) and includes several stages: development of Institutional Self-Evaluation Report (ISER) followed by the pre-visit and site visit by the evaluation team, concluding with the development and publication of the Institutional Feedback Report (IFR). Only HEIs with graduates are externally evaluated by THEQC.

A HEI undergoes Institutional external evaluation once every five years but all Turkish HEIs are obliged, by law, to submit ISERs to THEQC annually. Annual schedule of the IEE procedures is presented in Table 3 (taken from the IEE Guide).

Table 3. Schedule of Institutional External Evaluation Programme

Date	Activity
January-February	Applications for the evaluator pool are accepted (vacancy announcements are made if necessary).
January-March	HEIs prepare their ISERs.
End of April	The ISERs are submitted to the THEQC.
May	The HEIs that wish to be included in the Institutional External Evaluation Programme make a declaration of will.
June	Evaluator trainings are organized.
June	The HEIs that will be subject to external evaluation are announced.
July	The evaluation teams are formed, the prevention of any conflict of interest between the team members and evaluated institutions is ensured and verified.
July-August	The evaluation teams review the ISERs of the institutions they are assigned to evaluate
September	The site visit program is announced.
October-November	Site visits are paid to the institution included in the external evaluation program.
November-December	The institution submits its 21-day response.
December-January	The IFRs are conveyed to relevant HEIs.
February	A meeting is organized with the team leaders.
February	A meeting is organized with the administrators of the evaluated HEIs.
March	A meeting is organized with all HEI representatives to inform them on the feedback and experiences about the program in the relevant year.
March	The Higher Education Evaluation and Quality Assurance Annual Situation Report is prepared.

Self- evaluation

All HEIs have to provide an ISER annually and submit it to THEQC. THEQC provides HEIs with a digital tool, the QAMIS information management system, to help them to develop their ISERs. Each institution has access to QAMIS and, on the basis of institutional external evaluation criteria, uploads to it all of the requested analysis and evidence for its ISER. HEIs also have to upload supporting documents relating to each of the criteria. This self-evaluation process results in a grading, at the level of each criterion, of the maturity level of the institution (more details under part 2.5).

During the site visit the panel learned that a new software tool is being developed by THEQC, with functionalities to further enable the self-evaluation process itself in HEIs. This software is currently being tested by around 50 HEIs.

External evaluation including a site visit

According to the IEE Guide, the evaluation team makes two site visits to the HEI under evaluation. The first one is called a "pre-visit", it lasts one day and is organized 2-3 weeks before main site visit. Its purpose is to prepare the main visit both from the technical and administrative point of view.

The site visit usually lasts 2-3 days. During site visit the evaluation team interviews various stakeholders such as the HEI administration, students, teaching staff etc. and the panel learned that it was common for the evaluation team to have meals with representatives from the HEI under evaluation.

It is possible for evaluation team to split during the visit into two sub-teams, so that different faculties of the evaluated HEI may be observed. The findings of both sub-teams are incorporated into report after the visit. Student evaluators are sometimes asked to lead meetings with students.

During the stages described above as part of IEE, the HEIs are assisted by mentors within the mentorship programme initiated by THEQC.

Report resulting from the external evaluation

According to the IEE Guide, the evaluation team has to prepare a first draft of the Institutional Feedback Report (IFR) within 21 days of the site visit. The IFR is developed using QAMIS – the same system which is used for the production and uploading of the ISER. Once the draft IFR is submitted, the HEI has 21 days to comment on the report. The report is then finalised by the evaluation team (more details under part 2.4).

Follow-up

THEQC has no separate follow-up process, rather THEQC considers the preparation of annual ISER as a follow-up. HEIs do not get systematic feedback after their annual ISER is submitted to THEQC.

The Chair of the evaluation team also acts as the liaison person for the HEI regarding all the practical arrangements of the visit. The HEI must provide evaluators with appropriate accommodation and suggestions for restaurants.

For evaluation within the mission differentiation and specialization project the process is the same as for Institutional external evaluations**.**

Analysis

The use of QAMIS for Institutional external evaluation is very much appreciated by the HEIs, as the panel learned from the HEI representatives during the site visit. It was clear to the review panel that QAMIS simplifies the process of external evaluation and reduces the bureaucratic workload for HEIs. In general, the IEE Guide and the guide for writing ISERs are clear and well written; the panel also

considers the current mentorship programme to be very good support for HEIs to prepare them for Institutional external evaluation.

However, during the site visit, the panel found some inconsistencies between the IEE Guide and the practice. For example, the guide states that "*The Consistency Committee consisting of incumbent and/or former IEEC members who have not been appointed to evaluation teams in the relevant period performs the consistency checks of the draft report* […]" and that IEE Commission "[…] *forms the final version of the IFR and submits it for the Council's*". However, during the meetings with various stakeholders, the review panel came to the understanding that the IEE Commission do not change the IFRs as they are written by the evaluation teams. It is also clear that consistency checks are not done for every IFR, but only annually for some of the IFRs (randomly selected).

The current organization of site visits where meals are attended by the evaluation panel and representatives of HEIs risk the integrity of the evaluation. Although the review panel may acknowledge this practice as a possibility to gather additional evidence, the workload of the evaluators should be taken into account and opportunities for private team discussion as well as some time to relax should be provided.

The panel recognizes that the practice of splitting evaluation teams allows the teams access to more evidence by observing more of the HEI's faculties and/or study programmes. However, it encourages THEQC to monitor the practice carefully since it is important that the whole evaluation panel is able to take responsibility for all content of the IFR.

Currently, THEQC considers annual provision of the ISER as a follow-up mechanism. Although to some extent recommendations made by external evaluation teams are reflected in current system of annual institutional self-evaluation reports, the panel does not accept that this practice alone constitutes a reasonable follow-up activity for the Institutional external evaluation process.

Panel commendations

- The development and use of QAMIS to provide institutions with the possibility of more easily producing their self-evaluation reports is appreciated by all stakeholders.

Panel recommendations

- The panel recommends THEQC to further develop clearly defined follow-up activities after Institutional external evaluation.
- THEQC should reconsider the organization of site visits to avoid the implications of conflicts of interest raised by HEIs providing travel, accommodation and meals for the evaluation team; this has the potential to affect the independence and integrity of the process and may become even more relevant with the implementation of institutional accreditation in the near future.

Panel conclusion: substantially 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).

Evidence

Information in this standard covers the institutional external evaluation process and the process for authorisation and recognition of external evaluation and accreditation agencies. This section does not deal with EPS. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

The SAR states that THEQC currently has a large pool of trained evaluators (or experts), including academic and administrative staff and 61 student evaluators. The qualities expected of evaluators are set out in the IEE Guide. These include experience in HE and/or QA in HE; teamwork and cooperation and communication, time-management and organisational skills. The pool is refreshed annually by announcements from the agency and a call in February through the THEQC website. Various criteria, such as a grasp of the Bologna process and experience in accreditation systems, are applied in the selection process through the Evaluator System and candidates are also required to undertake tests before and at the end of their training, which are assessed.

All selected evaluators are trained face-to-face and this is supplemented with the on-line tool QAMIS. In fact, THEQC operates a 'flipped classroom' model where the on-line work is undertaken first and the evaluators are introduced to presentations and videos. This is followed by face-to-face training which includes work on case-studies and report writing workshops. Evaluators are also trained in behavioural aspect of reviews and in concepts such as ethical principles, transparency and accountability. Students are trained alongside other evaluators but are also offered an additional, specific training session. Training sessions are updated and revised in the light of feedback.

Evaluators are assigned to an evaluation according to the size of the HEIs to be evaluated. One new evaluator is included as an observer to familiarise them with the process and to help them to gain experience. Institutions have the right to object to an evaluator(s) assigned to their evaluation. Each panel contains a student evaluator.

The final part of the THEQC Code of Ethics, which guarantees the transparency and accountability of THEQC activities, contains a Statement of Confidentiality and Commitment to THEQC Code of Ethics. Evaluators are required to sign this statement to confirm that they will abide by the Code of Ethics and that they have no conflict of interest with the institution to which they have been assigned.

Analysis

The review panel discussed the selection, assignment and training of reviewers with members of the Council and also with evaluators for both the IEE and Authorisation and Recognition of Agencies processes. In the light of those discussions, it came to the conclusion that care was taken to ensure that each part of the process was carried out effectively and according to procedure. However, the panel was concerned to learn that, despite there currently being no evidence of conflicts of interest, nevertheless, the fact that selection and assignment of evaluators was the responsibility not of permanent staff of the agency, but of its Council which includes members who are currently seconded to THEQC whilst remaining on the pay-roll of their institution. Evaluators are also not remunerated for their work. Evaluators are also not remunerated for their work. The panel believes that a process in which selection and assignment of evaluators is carried out by those currently on the payroll of other HEIs constitutes a conflict of interest and that it would be difficult to sustain this practice in an institutional accreditation process. It also believes that the role of an evaluator ought to be remunerated. The role of evaluator is an important one; the agency will have expectations of the evaluators and vice versa. It is normal practice in most review processes in the EHEA for experts not to be paid for their work until the report is finalised to the satisfaction of all parties. Currently, THEQC

has no redress if an evaluation team were to fail to complete its task with the production of a satisfactory report.

The panel spoke to evaluators from the IEE and Authorisation and Recognition of Agencies processes. It also spoke to student evaluators. All confirmed the usefulness of the training and also of the value of the inclusion of observers. It was clear to the panel, following a discussions and a demonstration, that the role of QAMIS in providing supplementary training material and in supporting evaluators in the report-writing process is extremely valuable. The demonstration of QAMIS in action highlighted its clarity and functionality. Evaluators confirmed that they were asked for feedback on the training and that they could see the results of that feedback in the current training programme.

All evaluators that the review panel spoke with were aware of the importance of the Statement of Confidentiality and Commitment to THEQC Code of Ethics and of the need to ensure that there is no conflict of interest in the process.

The panel was informed that a small number of international and labour market representatives had been added to the evaluator pool recently but that these had still to be trained.

Panel commendation

- The panel commends QAMIS and other on-line tools and their role in supporting and facilitating both the training and the work of peer evaluators and also disseminating information.

Panel recommendation

- The panel recommends that THEQC reconsider the voluntary nature of the work of evaluators (and others) who work for THEQC and that it considers the implications of such a situation in relation to the agency's operational independence.
- The panel recommends THEQC to recruit experts from outside Turkey, in particular for its external evaluation panels, as well as continuing with current plans for including representatives from the business sector in the evaluation panels.

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.

Evidence

Information in this standard covers the institutional external evaluation process. This section does not deal with EPS and the process for authorisation and recognition of external evaluation and accreditation agencies. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

THEQC uses a set of criteria to perform institutional external evaluations, which are defined in the IEE Criteria document - *THEQC Institutional external evaluation criteria* (Annex 6 of SAR). This document is publicly available on the THEQC website. Criteria are divided into four categories: Quality Assurance System, Teaching & Learning, Research & Development and Administrative system. Each of the categories contains from 3 to 6 criteria, making in total 18 criteria used for institutional external evaluation, as presented in Table 4.

Table 4. Categories of criteria and criteria used in Institutional external evaluation

Category of criteria	Criteria
Quality Assurance System	Quality Policy
	Duties, Responsibilities and Activities of Higher Education Quality Commission
	Stakeholder Participation
Teaching and Learning	Program Design and Approval
	Continuous Monitoring and Updating of Programs
	Student – Centred Learning, Teaching and Evaluation
	Student Admission and Improvement, Recognition and Certification
	Teaching Staff
	Learning Sources Accessibility and Supports
Research and Development	Institution's Research Strategy and Objectives
	Institution's Research Resources
	Institution Research Staff
	Monitoring and Improving Institution's Research performance
Administrative System	Structure of Management and Administrative Units
	Resource Management
	Information Management System
	Quality of Outsourced Services
	Efficiency and Accountability of Management, Public Information

No overall judgment or formal decision is made in the Institutional external evaluation process. IFRs are used by institutions for self-improvement and by other governmental bodies (e.g. CoHE) to take decisions concerning HEIs (e.g. funding). The criteria are assessed using a grading system from 1 to 5 that indicates the level of maturity. During site visit, the review panel was provided with additional information which included explanations of the grading system, as presented in Table 5. However, maturity levels and their explanations could not be found on the THEQC website, next to other documents regulating the process.

Table 5. Maturity levels and their meanings used by THEQC in Institutional External Evaluation

Maturity level	Meaning
5	The institution's implementation serves as a model.
4	Has finalized the development of the related implementations on all relevant areas. Required improvements have been made in the course of time.
3	Has the related implementations. Some results have been obtained from them although they have not yet been applied to all relevant areas.
2	Has several related implementations; but they are not yet finalized/or do not cover all the relevant areas.
1	Does not have related implementations, the ideas to build them are on the development stage.

The maturity level gradings are not published in either the ISER or the IFR. Grading is only accessible to the evaluated HEI, evaluators of the evaluation team and THEQC Council. THEQC uses the grading results for statistical purposes and generalized results are published/presented to stakeholders.

The same categories of criteria are used for the mission differentiation and specialization project. The only difference from the criteria used in a standard IEE is that the mission differentiation and specialization project uses some additional performance indicators which are provided by CoHE and which reflect the focus of the specialized evaluation. These additional indicators are not published, but are introduced and explained to the HEIs and evaluators during the training sessions.

IFRs are approved by the IEE Commission, then given final approval by the Council and signed by the President. The Council does not perform any consistency checks within the approval process but verifies whether all of parts of the report are covered. During the site visit, the panel learned that, each year, the IEE Commission performs a consistency check of a sample of randomly selected IFRs produced in the current year. During this process, THEQC checks how each criterion has been applied and judged.

Analysis

It was clear to the panel during the site visit that the criteria used for Institutional external evaluation are well regarded by all stakeholders. Quality assurance is a relatively new topic in Turkish higher education and HEIs as well as other stakeholders were enthusiastic about external evaluation.

External evaluation criteria are published on THEQC website along with other Institutional external evaluation related documents and are, therefore, easily accessible. However, although in the IFRs the review panel found analysis under all criteria, the IEE Criteria published on the THEQC website, under the category of Quality Assurance System, are not clearly explained or defined.

The panel also learned about various activities organized by THEQC to introduce HEIs to the evaluation process, such as individual meetings with HEI representatives or general seminars for HEIs and /or other stakeholders. It was clear to the panel that HEIs are very aware of the criteria used for Institutional external evaluation and this was confirmed during the site visit by representatives of HEIs.

Currently, the only mechanism used by THEQC to ensure consistency of the application of the criteria in different IEEs is to organize training for evaluators and the annual sample review of some randomly selected IFRs by IEE Commission. The panel had the opportunity to read two of the IFRs in English (more details under part 2.6) and could not identify similar levels of in-depth analysis for the same criteria in the two. The IEE Criteria document does not provide more explicit understanding on the grading and application of criteria as the descriptions are mostly generic. The panel is not, therefore, convinced that consistency of application of the criteria and their assessment by maturity levels is sufficiently ensured.

Regarding the additional performance indicators, introduced by CoHE for evaluations under the mission differentiation and specialization project, the panel believes they should be publicly available, not only presented to the HEIs under evaluation during the training meetings.

The panel believes that, in order to facilitate the move from institutional external evaluation to institutional external accreditation, the agency will need to develop a new assessment system, based on a different approach, as the current maturity level grading will not be suitable for accreditation. Stakeholders should be also involved in this process, since the current system has contributed to the agency's aim of working with the Turkish HE sector to develop their internal QA systems; HEIs will, therefore have useful contributions to make to any new approach.

Panel recommendations

- The panel recommends THEQC to put in place mechanisms for ensuring the consistency of judgements within external review panels.

Panel suggestions for further improvement

- In moving from external evaluation to accreditation, THEQC might consider developing and implementing a new assessment system, based on an approach more suitable for a decision-making process related to institutional accreditation.
- Although additional performance indicators for mission differentiation and specialization are designed and introduced and by CoHE and only used occasionally, as CoHE requires, THEQC might consider publishing their definitions next to the other IEE documents.

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.

Evidence

Information in this standard covers the institutional external evaluation process. This section does not deal with EPS and the process for authorisation and recognition of external evaluation and accreditation agencies. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

Institutional feedback reports (IFR) for IEE procedure are produced by the evaluation team. During the meetings with external evaluators and other internal THEQC stakeholders, the review panel learned that the main responsibility for producing the report lies with the chair. However, s/he is free to distribute responsibilities for writing particular parts of the report to other members of the evaluation team. As a result, the report is produced by all of the team members working together. The IFR is produced using QAMIS (more details under part 2.3) which provides evaluators with guidance on report writing and on the use and reflection of evidence provided by the HEI and its ISER.

A first draft report is produced by the evaluation team. Once the draft report is finalised, the HEI under review has 21 days to comment on it. During the site visit panel learned that HEIs may comment on both the interpretation of the evidence and application of the criteria. Evaluators must take into consideration the comments made by the HEI and should reflect, as appropriate, changes made as a result of the comments. During the meetings with the representatives of HEIs the panel learned that HEIs can also point out factual inaccuracies and provide 'late evidence' during the same 21-day period. After the 21-day period the evaluation team finalises the report.

IFRs are approved by the Council and signed by the president, then they are published on the agency's website.

Maturity level gradings from 1 to 5 are used to evaluate to what extent each of the criteria is fulfilled (more details under part 2.5). Every member of the evaluation team proposes their own grading for each of the criteria and then the whole team must come to an agreement on the matter. Gradings agreed by the evaluation team are not published together with the IFR or anywhere else. However, they are later used by the THEQC for statistical analysis as well as by HEIs to compare with their own ISER gradings.

The panel had the opportunity to look at two IFRs in English produced by THEQC evaluation teams. The structure of these reports was similar, consisting of information on the evaluated HEI, composition of the panel of evaluators, evidence under each of the criteria used and conclusion which includes strengths and areas of improvement for each of the categories of criteria. However, the extent to which there is an in-depth analysis, or recommendations made by different evaluation teams, differed.

For reviews under the mission differentiation and specialization project a standard IFR is produced that includes the additional performance indicators. After the approval of IFR by the THEQC Council, the evaluation team extracts information on the performance indicators and other parts that are relevant for CoHE and presents it as a separate report. This report is not published by CoHE.

THEQC does not take any formal decision based on its external evaluation procedure and the result. No summary report is prepared.

Analysis

The development and use of the QAMIS software have provided, in general, a very easy and convenient way to manage the Institutional external evaluation. With regard to reporting, QAMIS allows experts to easily analyze the ISER and other documents provided by institution, as well as the facility to all work on the report simultaneously. Having seen a demonstration of QAMIS during the site visit, the panel is of the view that it is a useful tool that enables the evaluation teams to produce reports with a clear and understandable structure.

Evaluation teams provide an assessment of the maturity level of the HEI for each standard but IFRs are published without this information. The maturity level grading is used by both HEIs, in the self-evaluation procedure and by evaluation teams, for writing feedback reports. Moreover, these maturity levels are also used outside of specific external evaluations, to provide information for generalized statistical analyses. Such statistics are used in various seminars and meetings held by THEQC, for dissemination to stakeholders. These facts convinced the review panel that maturity level grading is one of the key parts of the IFR and that therefore it should be published together with the rest of the report.

In the panel's experience, draft reports are provided to institutions only so that they can check the factual accuracy of the draft. Expressing dissatisfaction with the interpretation and/or application of criteria would normally constitute part of a separate and independent appeals procedure (see 2.7).

Although the panel had the possibility to read only two IFRs in English, it was enough to form the impression that not all criteria are addressed in equal depth and detail. Under some of the criteria, very detailed elaborations at programme level can be found, while under other criteria there is only few generic sentences. The panel is of understanding that consistency of the IFRs is not systematically ensured.

The panel recognizes that reports made by the extracts of IFRs produced under the mission differentiation and specialization project reviews are only provided to CoHE and are therefore not published. Given that these extracts do not include any new information or analysis, and are used only by CoHE, the panel could see that they provide no new information and so do not need to be published in addition to the report that is accessible on THEQC website.

Panel commendations

- The review panel commends THEQC for the development and implementation of QAMIS and other online tools to support and facilitate the work of evaluators in producing the IFRs and also for disseminating information.

Panel recommendations

- The panel recommends that maturity level grades form part of the published reports.
- THEQC should develop mechanisms to ensure consistency not only of the structure of the reports but also of the in-depth analysis they provide.

Panel suggestions for further improvement

- The agency might consider including a summary at the beginning or the end of each report.

Panel conclusion: partially 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.

Evidence

Complaints and appeals processes are available in the institutional external evaluation process and the process for authorisation and recognition of external evaluation and accreditation agencies. This section does not deal with EPS. The mission differentiation and specialisation project is covered by default. See 'Scope of the review' for further details.

The Directive for Institutional external evaluation contains a separate article regarding complaints and appeals, as does the Guide for the Authorisation and Recognition of External Evaluation and Accreditation Agencies. The article in the IEE directive is clear that institutions may object to a report, "in whole or in part" within 60 days of its publication. Council, consisting of thirteen representative members from the ministry, CoHE, the Vocational Qualification Institution, the Turkish Accreditation Agency, the Science and Technological Research Council of Turkey, the Health Institutes of Turkey and the Union of Chambers and Commodity Exchanges of Turkey and including the President and a student, is responsible for resolving the matter after consultation with the IEE Commission and the HEI will be notified of the decision, again within 60 days of the receipt of the objection. The SAR indicates that this part of the process is an appeal.

The SAR also described the two mechanisms for making a complaint: one is the 360-degree feedback mechanism within the IEE process. The other is the right to complain to Council in writing via THEQC's website. Evaluators (experts) and institutions may make a complaint in this way.

The appeals (objection) process for the Authorisation and Recognition of External Evaluation and Accreditation Agencies is the same but must be made within 30 days. Complaints may be made in the same way as for the IEE process, via the THEQC website, and this can be done at any time.

There have been no institutional or authorisation/recognition complaints to date. So far, only one appeal has been made by an institution, in relation to its IFR. The appeal was dealt with by Council, following consultation with the IEEC, to the satisfaction of both parties.

Analysis

It was difficult for the panel to assess the agency's complaints and appeals processes as there was so little experience of their operation to date. However, the panel noted the following points:

The links to the web page form to submit a complaint are clearly indicated and operational. The home page of the Quality Management Information System page of the website says "You can submit your

suggestions, appeals, complaints requests and comments by clicking on the links below." However, as yet there is no documented explanation of the process of appeal or complaint. Nevertheless, institutional and accreditation agency representatives interviewed by the panel were aware of the article related to making a complaint or an appeal and were in no doubt that they could contact THEQC for further information if needed.

The panel believes that further clarity of the terms 'complaint' and 'appeal' are needed. For example, 360-degree feedback does not constitute a complaints process. Feedback will allow the agency to develop and improve its processes. A complaint is something that must be dealt with via due process.

The agency is aware that, as it moves towards an institutional accreditation process, it will need to re-evaluate its processes for complaints and appeals. The panel was told that there is an intention to set up an Ethical Committee in the next year. Nevertheless, at the moment, complaints or appeals are dealt with by the Council. This is a clear conflict of interest given the current composition of the Council. However, even if the composition of Council were to change, as the body against which the complaint and appeal has been made, it is unacceptable for that same body to come to a decision.

The panel therefore makes the recommendations below in order to assist the agency to comply more fully with standard 2.7.

Panel recommendations

- The panel recommends the agency to clarify the definitions of the terms 'complaints and appeals', ensuring that there is no confusion with and a separation from other mechanisms designed for the purposes of feedback.
- The panel recommends that the agency ensures that its website clearly differentiates between pages that allow users to submit feedback and those that include information of separate processes for making a complaint or an appeal.
- The agency should supplement what is currently in the legal article to document and publish clear processes for complaints and appeals on its website.
- The agency should ensure that any new mechanism for dealing with complaints and appeals allows for a degree of independence from the Council in order to avoid any conflict of interest.

Panel conclusion: partially compliant

ADDITIONAL OBSERVATIONS (optional section)

> *Even when the sole purpose of the review is to assess the agency's compliance with the ESG for purposes of ENQA membership application, the review panel may include in its report any additional reflections or developmental recommendations that it may wish to offer. If these are extensive, they can be included in this optional additional section of the report, or if brief, as part of the conclusions. This box to be deleted before publishing.*

STUDENT INVOLVEMENT

It was clear to the review panel that currently there is no strong national student movement or students' union. In this light, the panel wishes to express its appreciation that students are nonetheless involved in evaluator teams and Council. It also commends the formation of the Student Commission, consisting of student member of the Council and student evaluators.

Consequently, the panel wishes to stress the importance of student participation in quality assurance processes and in higher education matters in general. This does not only provide higher education stakeholders with a new, fresh and sometimes very different perspective which can be used to improve quality assurance and higher education, but also encourages a new generation of higher education leaders whom would be very much involved and devoted to quality culture in Turkey.

Currently in Turkey additional support for student involvement in higher education and quality assurance would help such involvement to grow and develop. THEQC could help in this regard by taking an even more active role and continuing to strengthen its work in supporting student participation in quality assurance processes at all levels. Also, independence of student involvement from the other stakeholders should be ensured and THEQC could work on developing a mechanism for students to nominate their representative on the Council, as is the process for other stakeholder members, as well as the composition of Student Commission, for a more active and meaningful participation of students in the activities of the agency.

CONCLUSION

3.1 Activities, policy and processes for quality assurance	• The panel commends the work done by THEQC so far, to create a quality culture in the Turkish HE system and in its HEIs, with the aim of embedding the ESG as the means for enhancement and improvement. • The panel commends the recent creation of a student commission, which has already organised different dissemination and information activities, with the support of THEQC.
3.4 Thematic analysis	• The consistent production of a valuable annual publication that is informed by feedback and by evidence.
3.6 Internal quality assurance and professional conduct	• The panel commends the use of platforms and on-line tools for the implementation of the internal quality assurance system and the dissemination of relevant information. • The panel commends the procedures in place for promoting stakeholders' participation in agency activities, such as regular face-to-face meetings and periodic surveys.
2.2 Designing methodologies fit for purpose	• The panel commends the way institutional external evaluations are achieving aims and objectives set to help improve internal quality assurance systems of HEIs. • The stakeholders' contribution to continuous improvement of methodologies through various surveys applied to collect feedback is acknowledged and appreciated.
2.3 Implementing processes	• The development and use of QAMIS to provide institutions with the possibility of more easily producing their self-evaluation reports is appreciated by all stakeholders.
2.4 Peer-review experts	• The panel commends QAMIS and other on-line tools and their role in supporting and facilitating both the training and the work of peer evaluators and also disseminating information.
2.6 Reporting	• The review panel commends THEQC for the development and implementation of QAMIS and other online tools to support and facilitate the work of evaluators in producing the IFRs and also for disseminating information.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance

Substantially compliant with recommendations:
- In the development of future strategic documents, the agency should make the participation of students more visible. It should ensure that the student member of the Council is involved in the agency's work to the same extent as other members.
- The panel recommends including further information in the Strategic Plan such as: plan of publications (including thematic analyses) and the staff development plan.
- THEQC should publish the composition and tasks of the Advisory Board on its website.

3.2 Official status

Fully compliant with no recommendations.

3.3 Independence

Partially compliant with recommendations:
- The panel recommends that the agency reconsiders its structure in terms of the value of an overarching and representative governing body and an executive arm which manages the agency's operations and processes.
- In order to improve the operational independence, the agency must continue to improve the balance between permanent staff who are on the payroll of the agency and those who work as consultants/advisors/experts. The current operational independence of the agency is not assured due to the presence of third parties in the daily job of the agency.

3.4 Thematic analysis

Fully compliant with no recommendations.

3.5 Resources

Partially compliant with recommendations:
- The panel recommends that the agency continues to improve the balance between permanent staff who are on the payroll of the agency and those who work as consultants/advisors/experts. It is crucial for an agency to build its own capacity and expertise based on its own staff. A clear allocation of tasks and responsibilities in the permanent staff (functional profiles could be useful) and the establishment of an overall staff development plan, including annual training programs, are seen by the panel as useful measures in this field.
- THEQC should strengthen the capacity of the core of professional permanent staff.
- In order to safeguard the future sustainability of the agency, the THEQC's budget should be planned and designed as part of the strategic planning process, taking into account previous year's expenditure and upcoming years planned

	activities. Annual monitoring of the strategic plan is important in this regard.
3.6 Internal quality assurance and professional conduct	**Substantially compliant** with recommendations: • THEQC should develop a clear definition of responsibilities for internal quality assurance issues within the agency, in order to improve its organization and effectiveness. • THEQC should further use the data they have to really develop the agency's internal quality systems rather than just comply with external feedback from different stakeholders. • The panel recommends a full implementation of the Internal Quality Assurance System, with the definition of indicators in all the agency's processes.
3.7 Cyclical external review of agencies	**Fully compliant** with no recommendations.
2.1 Consideration of internal quality assurance	**Substantially compliant** with one recommendation: • The panel recommends that the agency provide more focus on the provision of feedback on the ISERs which are elaborated by HEIs, in order to increase the impact of these reports on the quality improvement of institutions and to further develop their capacity to align with the standards in part one of the ESG.
2.2 Designing methodologies fit for purpose	**Substantially compliant** with one recommendation: • The panel recommends THEQC to carry out an internal review of the current evaluation process, as it is very new and will move to one of institutional accreditation; particular focus should be on follow-up and on how stakeholders – in the widest sense and not only those represented in the Council - are involved in the design of methodologies, not just in the review of criteria and processes.
2.3 Implementing processes	**Substantially compliant** with recommendations: • The panel recommends THEQC to recruit experts from outside Turkey, in particular for its external evaluation panels, as well as continuing with current plans for including representatives from the business sector in the evaluation panels. • The panel recommends THEQC to further develop clearly defined follow-up activities after Institutional external evaluation. • THEQC should reconsider the organization of site visits to avoid the implications of conflicts of interest raised by HEIs providing travel, accommodation and meals for the evaluation team; this has the potential to affect the independence and integrity of the process and may become even more relevant with the implementation of institutional accreditation in the near future.

2.4 Peer-review experts	**Substantially compliant** with one recommendation: • The panel recommends that THEQC reconsider the voluntary nature of the work of evaluators (and others) who work for THEQC and that it considers the implications of such a situation in relation to the agency's operational independence.
2.5 Criteria for outcomes	**Substantially compliant** with one recommendation: • The panel recommends THEQC to put in place mechanisms for ensuring the consistency of judgements within external review panels.
2.6 Reporting	**Partially compliant** with recommendations: • The panel recommends that maturity level grades form part of the published reports. • THEQC should develop mechanisms to ensure consistency not only of the structure of the reports but also of the in-depth analysis they provide.
2.7 Complaints and appeals	**Partially compliant** with recommendations: • The panel recommends the agency to clarify the definitions of the terms 'complaints and appeals', ensuring that there is no confusion with and a separation from other mechanisms designed for the purposes of feedback. • The panel recommends that the agency ensures that its website clearly differentiates between pages that allow users to submit feedback and those that include information of separate processes for making a complaint or an appeal. • The agency should supplement what is currently in the legal article to document and publish clear processes for complaints and appeals on its website. • The agency should ensure that any new mechanism for dealing with complaints and appeals allows for a degree of independence from the Council in order to avoid any conflict of interest.

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

SUGGESTIONS FOR FURTHER DEVELOPMENT

3.1 Activities, policy and processes for quality assurance	• THEQC might increase the information about the student commission on its website (e.g. commission's role, performed activities, etc.). • THEQC could also consider the value of having international representation within its governance structure.
3.3 Independence	• The panel suggests modifying the procedure for the selection of student members in THEQC bodies, in order to ensure the transparency of selection.
3.4 Thematic analysis	• The panel suggests that the development of further thematic publications could be part of the strategic planning or annual monitoring process in order to ensure that the production of such publications each year is costed in terms of staff workload and that there is a strategic approach to the selection of topics.
3.5 Resources	• The panel suggests that the agency takes into consideration its premises as it plans to increase the number of permanent staff.
3.6 Internal quality assurance and professional conduct	• The panel suggests that the THEQC verifies regularly the effectiveness of its internal quality assurance system, both internally and externally, for example, by audits carried out by experts in the field or by other valid methods.
2.1 Consideration of internal quality assurance	• The panel commends the mentorship initiative for helping universities in the first cycle of institutional external evaluation process. It suggests that THEQC now reconsider this programme and its focus and purpose in order to avoid possible conflicts of interest, especially when the IEE process moves to one of institutional accreditation.
2.5 Criteria for outcomes	• In moving from external evaluation to accreditation, THEQC might consider developing and implementing a new assessment system, based on an approach more suitable for a decision- making process related to institutional accreditation. • Although additional performance indicators for mission differentiation and specialization are designed and introduced and by CoHE and only used occasionally, as CoHE requires, THEQC might consider publishing their definitions next to the other IEE documents.
2.6 Reporting	• The agency might consider including a summary at the beginning or the end of each report.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

DECEMBER 9, 2019		
19:00-21.00	Review panel's kick-off meeting and preparations for day I	
19:30-20.00	Pre-visit meeting with the agency contact person to clarify elements related to the overall system and context	Aslihan NASIR, Council Member
21:00	Dinner (panel only)	

DECEMBER 10, 2019		
TIMING	**TOPIC**	**PERSONS FOR INTERVIEW**
9:00-9:30	Review panel's private meeting	
9:30-10:30	Meeting with the President of THEQC	Muzaffer ELMAS, President
10:30-10:45	Review panel's private discussion	
10:45-11:45	Meeting with the team responsible for preparation of the self-assessment report	Tuba CANVAR KAHVECI, Consultant Kazım KARABOGA, Consultant Deniz KOZANOGLU, Consultant Enes GOK, Consultant
11:45-12:00	Review panel's private discussion	
12:00-13:00	Meeting with representatives from the Council	Tuncay DOGEROGLU, Council Member Sina ERCAN, Council Member Adem CEYLAN, Council Member Orbay EVRENSEVDI, Council Member - *not present*
13:00-14:00	Lunch (panel only)	
14:00-14:45	Meeting with representatives from the Institutional External Evaluation Commission	Sibel AKSU YILDIRIM, Vice-President Aslihan NASIR, Council Member Dilek AVSAROGLU ERKAN, Expert Yasin GUNDUZ, Expert
14:45-15:00	Review panel's private discussion	
15:00-15:45	Meeting with representatives from the Recognition and Authorization of External Evaluation and Accreditation Agencies Commission	Ilker Murat AR, Council Member Figen CIZMECI SENEL, Council Member Ayhan KOCER, Expert

15:45-16:15	Review panel's private discussion	
16:15-17:00	Meeting with representatives from the Publicity and Stakeholder Relations Commission	Tugba YANPAR YELKEN, Council Buket AKKOYUNLU, Advisor Umit KOCABICAK, Advisor Cetin EROL, Council Member
17.00 - as necessary	Wrap-up meeting among panel members and preparations for day II	
	Dinner (panel only)	

December 11, 2019		
TIMING	**TOPIC**	**PERSONS FOR INTERVIEW**
9:00-9:30	Review panel private meeting	
9:30-10:15	Meeting with ministry representatives	Omer ACIKGOZ, CoHE Member Mahmut OZER, MEB Vice-Minister - *not present; replaced by* Prof. dr. Kemal Varim NUMANOGLU, Representative of Ministry of Education (Unit of Vocational and Technical Education, General Director) Öktem VARDAR, The Presidential Education Policies Council Osman Seckin AKBIYIK, MYK
10:15-10:30	Review panel's private discussion	
10:30-11:15	Meeting with heads of some reviewed HEIs/HEI representatives	Mustafa VERSAN KOK, ODTU. Rector Mahmut AK, Istanbul Univ. Rector Ipek KARAASLAN, Yeditepe Univ. Vice Rector Esra GENÇTÜRK Özyeğin Univ. Rector Füsun EYIDOGAN Başkent Ünv Vice Rector Canan AYKUT BINGOL, Yeditepe Univ. Rector - *not present* Aysun BAY KARABULUT, Malatya Turgut Ozal Univ. Rector - *not present*
11:15-11:30	Review panel's private discussion	
11:30-12:15	Meeting quality assurance officers of HEIs and of External Evaluation Agencies	Ali SINAG, Ankara Univ. Quality Commission Sultan TASCI, Erciyes Univ. Quality Commission Timur DOGU, MUDEK President Afsun Ezel ESATOGLU, SABAK President

Timing	Topic	
		Iskender SAYEK, TEPDAD President
12:15-12:30	Review panel's private discussion	
12:30-13:15	Meeting with representatives from the reviewers' pool (both for HEIs and External Evaluation Agencies)	Musa EKEN, Institutional external evaluator

Bulent OZGULER, Institutional external evaluation and MÜDEK evaluator

Erdal EMEL Institutional external evaluation and EUA-IEP evaluator

Tijen AKSIT, EPSs evaluator

Oktem VARDAR, Institutional external evaluator - *not present*

Yuksel KAVAK Institutional external evaluation and EPDAD evaluator - *not present* |
| 13:15-14:15 | Lunch (panel only) | |
| 14:15-15:00 | Meeting with students: the student member in the Council and students involved in evaluations (of HEIs and External Evaluation Agencies) | Berk ER, Council Member

Fatma AVCU, SABAK student evaluator

Gamze UYUK, Institutional external evaluator, MÜDEK student evaluator

Muhammed İYİSAN, Institutional external evaluator |
| 15:00-15:15 | Review panel's private discussion | |
| 15:15-16:15 | Meeting with permanent staff | Mehmet YILMAZ, General Secretary

Faruk ALTUNTAS, IT Personnel

Ece FIDAN, Personnel

Funda CANKAYA, Personnel - *not present* |
| 16:15-16:30 | Review panel's private discussion | |
| 16:30-17:15 | Meeting with employer representatives | Hakan ULKEN, TOBB representative and Council Member

Nazmi SAHIN, Ankara Chamber of Commerce Member

Arzu ERDOGAN, TISGIAD President |
| 17.15 - as necessary | Wrap-up meeting among panel members: preparation for day III and provisional conclusions | |
| | Dinner (panel only) | |

December 12, 2019		
TIMING	TOPIC	PERSONS FOR INTERVIEW

9:00-10:00	Meeting among panel members to agree on final issues to clarify	
10:00-11:00	Meeting with CEO to clarify any pending issues	Muzaffer ELMAS, President
11:00-12:30	Private meeting among panel members to agree on the main findings	
12:30-13:30	Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings	
13:30-14:30	Lunch (panel only)	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

1. Background and context

Turkish Higher Education Quality Board was founded as part of the "Higher Education Quality Assurance Regulation" that entered in force on 23rd July 2015. The Board was reorganized and renamed as the Higher Education Quality Council (THEQC) according to the Additional Provision No. 35 added to the Law No. 2547 on Higher Education following the enactment of the Law No. 7033 on Amendment of Certain Laws and Executive Orders on 1st July 2017. By this law, THEQC has gained both administrative and financial independence. As a result, THEQC has become the only national body responsible for quality assurance in the Turkish higher education system. In this respect, THEQC has become a national authority by law to independently evaluate Turkish higher education institutions. THEQC consists of 13 members, including a student representative. Furthermore, almost all major stakeholders of higher education system of Turkey have representation in THEQC. THEQC's mission is to enhance the quality assurance system of higher education in Turkey in order to contribute to the continuous improvement of higher education institutions and the achievement of universal competences by individuals. In addition, the vision of THEQC is to be an effective and internationally recognized institution in the field of quality assurance in higher education. In this regard, THEQC aims to implement and enhance the quality assurance processes of the national higher education system by supporting the internal quality assurance system and the progress of quality culture, and conducting the external evaluation of the higher education institutions. Consequently, THEQC can significantly contribute to the enhancement of intellectual capital and sustainable development of the society in a transparent, accountable and collaborative manner. The primary duties of THEQC are: external evaluation of higher education institutions; coordination of the authorization process of national and recognition process of international accreditation agencies; internalization and dissemination of quality assurance culture in higher education institutions.

THEQC contributes to the progress of quality assurance system within HEIs by **requesting Institutional Self-Evaluation Reports (ISERs) on annual basis**. THEQC has also performed the **institutional external evaluation of HEIs** through independent and well-trained as well as experienced external evaluation teams. According to the related rules and regulations, HEIs are required to undergo institutional external evaluation at least once in every five years. The main purpose of institutional external evaluation program is to evaluate processes related to learning and teaching, research and development, and governance system of HEIs. The external evaluation teams prepare Institutional Feedback Reports (IFRs) after their site visits, which are the most valuable output of the external evaluation process of HEIs. THEQC and HEIs publicly announce and share both ISERs and IFRs through their official web pages in terms of transparency principle. As an evidence of internalization of the accountability principle, THEQC identifies strengths and weakness of higher education system by publishing "Annual Situation Reports" through the consolidation of both ISERs and IFRs. In this Annual Situation Report, THEQC sheds light to the drawbacks as well as the gains/improvements of the higher education system in Turkey from a holistic approach. Every stakeholder of the higher education system can benefit from this report in designing its strategies and policies.

In addition to institutional external evaluation program, THEQC also authorizes or recognizes accreditation agencies operating in the Turkish Higher Education Quality Assurance System. External evaluation services for program accreditation in higher education institutions is conducted by the independent accreditation agencies, which are authorized or recognized by THEQC. In line with its

internationalization vision, THEQC recognizes international accreditation agencies as well. During 2019, THEQC builds up mutual collaboration with three international accreditation agencies, which show evidence of compliance with ESG as well as with national standards and principles. Besides, THEQC gave authorization to 11 national accreditation agencies from different disciplines. During authorization and recognition procedures, THEQC looks for compliance of agencies with both national and international standards and principles.

Finally, THEQC arranges activities for the development and dissemination of quality culture in higher education system. In parallel, THEQC provides guidance services, organizes events and engages in various publishing activities that help HEIs to build up a quality assurance culture in higher education system. Organizing trainings, workshops and meetings; distributing guideline documents; publishing Council's e-newsletter; developing "Quality Assurance Management Information System-QAMIS" for HEIs; creating an online platform with training videos and knowledge-base; implementing mentorship programme for the HEIs that will undergo institutional external evaluation are among the prominent activities of THEQC. It is also noteworthy to mention the development and usage of a distinctive "QAMIS", which has several interfaces for different users: HEIs, external evaluation teams, accreditation agencies, and the members of THEQC. The QAMIS facilitates procedures, enables monitoring of the improvements over the years for HEIs, and reduces the workload of different users.

As of 2019, there are 207 HEIs in Turkey, and of those 129 are state universities, 73 are foundation universities, and 5 are foundation vocational schools. Currently, all of these institutions comprise of 26.198 programs, 12.628 master's programs, and 5.539 Ph.D. programs. For 2018-2019 academic year, a total of 7.740.502 students were enrolled in HEIs; including 4.420.699 in bachelor's programs, 394.174 in master's programs, and 96.199 in doctoral programs. The current structure of the Turkish higher education system is in compliance with the three-cycle system (bachelor's degree, master's degree, and doctorate degree) introduced by the Bologna Process. Since 2016, all HEIs in Turkey had to prepare their Institutional Self-Evaluation Reports (ISERs) on annual basis as a requisite of quality assurance system (ISERs can be accessed through http://yokak.gov.tr/raporlar/kurum-ici-degerlendirme-raporlari). During the last four years, THEQC completed the external evaluation process of 160 HEIs out of 206, and authorized independent national accreditation agencies and recognized international accreditation agencies that show evidence of compliance with ESG as well as with national standards and principles, which were declared on THEQC's web page (http://yokak.gov.tr/akreditasyon-kuruluslari/akreditasyon-kuruluslari-yetkilendirme-taninma).

THEQC has been an affiliate of ENQA since February 2019 and is applying for ENQA membership.

THEQC is applying for EQAR registration for the first time.

2. Purpose and scope of the evaluation

This review will evaluate the way in which and to what extent THEQC 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 Board of ENQA to aid its consideration of whether membership of THEQC should be granted and to EQAR to support THEQC application to the register.

2.1 Activities of THEQC within the scope of the ESG

In order for THEQC to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of THEQC 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 independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary.

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

1. Institutional external evaluation (IEE) of HEIs (based on Institutional Feedback Reports - IFRs), including annual monitoring of internal quality assurance activity of HEIs (based on Institutional Self-Evaluation Reports – ISERs)

2. English Preparatory Schools (EPSs) external evaluation

In addition, the following activities as listed below should be covered in the review (to the extent applicable):

1. Mentorship programme (the activity is pertinent to the agency's application in EQAR in particular referring to the agency's compliance with ESG 3.1 and ESG 3.3. The THEQC's self-evaluation report and the external review report should address the way in which the agency ensures that its mentorship support activities offered to higher education institutions are separated from its external evaluation activities (please refer to Annex 5 of EQAR's Use and Interpretation of the ESG)

2. Annual situation report of the higher education system in Turkey (the activity is relevant in relation to the agency's compliance with ESG 3.4, to the extent THEQC's annual situation reports describe and analyse the general findings of the agency's external QA evaluations)

3. Reviews of HEI within the "mission differentiation and specialization project" of CoHE (regardless of this not being a separate external QA activity, it is an activity undertaken on top of the IEE procedure and should therefore be considered as part of the review, to the extent it concerns aspects related to teaching and learning in higher education)

4. Authorization and recognition of independent accreditation agencies (regardless of this not being an external QA procedure concerning higher education institutions, it is a recognition process of quality assurance agencies. The review should thus address the recognition procedure of quality assurance agencies that are not EQAR-registered referring to THEQC's Criteria for Authorization and Recognition of Accreditation Agencies).

3. The Review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with *the Guidelines for ENQA Agency Reviews* and the requirements of *the EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the draft Terms of Reference for the review;
- Finalising the Terms of Reference for the review following EQAR's Eligibility Confirmation (if relevant);
- Nomination and appointment of the review panel;
- Self-assessment by THEQC including the preparation and publication of a self-assessment report;
- A site visit by the review panel to THEQC;
- 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 Board of ENQA and their decision regarding ENQA membership;
- Follow-up of the panel's and/or the 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.

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 Board of ENQA are not eligible to serve as reviewers.

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

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

THEQC 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 THEQC 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 which has four 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 draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include 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 THEQC at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by THEQC in arriving in Ankara, Turkey.

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 concerning each ESG. A draft will first be submitted to the ENQA review coordinator who will check the report for consistency, clarity and language, and it will be then submitted to THEQC usually within 10 weeks of the site visit for comment on factual accuracy. If THEQC 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 THEQC and finalise and submit the document 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* 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, THEQC is also requested to provide a letter addressed to the Board of ENQA outlining its motivation for applying for membership and the ways in which THEQC expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board of ENQA together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

THEQC will consider the expert panel's report and will publish it on its website once the Board of ENQA has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the Board. THEQC 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 Board of ENQA 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 to be of particular importance or a challenge to THEQC. Its purpose is

entirely developmental and has no impact on the judgement of membership and/or judgment 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 THEQC is in compliance with the ESG and can thus be admitted/reconfirmed as a member of ENQA. The report can 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 Board. Once submitted to ENQA and until it is approved by the Board, the report may not be used or relied upon by THEQC, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

6. Budget

THEQC shall pay the review related fees as specified in the contract between ENQA and THEQC.

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 of ENQA 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 the travel and subsistence costs related to the second site visit will be charged to the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	July 2019
Appointment of review panel members	August 2019
Self-assessment completed	By 31 August 2019
Pre-screening of SAR by ENQA coordinator	September 2019
Preparation of site visit schedule and indicative timetable	October 2019
Briefing of review panel members	November 2019
Review panel site visit	December 2019
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	February 2020
Draft of evaluation report to THEQC	March 2020
Statement of THEQC to review panel if necessary	April 2020
Submission of final report to ENQA	May 2020
Consideration of the report by Board of ENQA	June 2020

ANNEX 3: GLOSSARY

ASR	Annual Situation Report
CoHE	Council of Higher Education
EPS	English Preparatory School
ENQA	European Association for Quality Assurance in Higher Education
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area*, 2015
HE	higher education
HEI	higher education institution
IEE	institutional external evaluation
IEE Guide	*THEQC Institutional External Evaluation Guide*
IEE Criteria	*THEQC Institutional External Evaluation Criteria*
IFR	institutional feedback report
ISER	institutional self-evaluation report
QA	quality assurance
SAR	self-assessment report
THEQC	Higher Education Quality Council of Turkey

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY THEQC

Self-assessment report (October 2019)

   Annex 1: Law 2547 on Higher Education, additional article 35
   Annex 2: The Regulation on Higher Education Quality Assurance and Hither Education Quality Council
   Annex 3: Procedures and Principles for Election of Student Member of the THEQC
   Annex 4: THEQC 2019-2023 Strategic Plan
   Annex 5: THECQ Code of Ethics
   Annex 6: THEQC Institutional External Evaluation Criteria
   Annex 7: THEQC Institutional External Evaluation Guide (version 1.2)
   Annex 8: THEQC Institutional Self-Evaluation Report Writing Guide (version 1.4)
   Annex 9: EPSs Areas and Minimum Standards
   Annex 10: THEQC Guide for the Accreditation and Recognition of External Evaluation and Accreditation Agencies

ADDITIONAL DOCUMENTS PROVIDED BY THEQC BEFORE AND DURING THE SITE VISIT, ON REQUEST OF THE REVIEW PANEL

   Additional information about the THEQC current staff
   Distribution by gender of experts in THEQC pool and those who participated in evaluations
   English Preparatory Schools – 2018. 360-degree survey
   Evaluation of the Information Meeting on Internal and External Evaluation Processes of Higher Education Institutions
   Evaluation of Review Meeting of 2018 Institutional External Evaluation Program & Information
   Evaluation team pre-visit plan sample
   Evaluation team site visit plan sample
   Higher Education Evaluation and Quality Assurance Annual Situation Report 2018-2019
   Institutional External Evaluation Program – 2019. 360-degree feedback surveys
   List of Council members including HEIs where they belong
   List of Advisory Board members
   Meeting on 2019 Institutional External Evaluation Program 22-26 February 2019
   Samples of Institutional Self-Evaluation Reports
   Samples of Institutional Feedback Report
   Site-visit evaluation form
   Staff training program – 2019
   Strategic Plan surveys
   THEQC budget details: the distribution of expenses by activities
   THEQC 2015-2019 Review Report

OTHER SOURCES USED BY THE REVIEW PANEL

THEQC website: www.yokak.gov.tr

enqa.

European Association for
Quality Assurance in Higher Education

ENQA AGENCY
REVIEW 2020

THIS REPORT presents findings of the ENQA Agency Review
of the Turkish Higher Education Quality Council (THEQC),
undertaken in 2019.

enqa.

European Association for
Quality Assurance in Higher Education