

ENQA AGENCY REVIEW

# HELLENIC AUTHORITY FOR HIGHER EDUCATION (HAHE)

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5 SEPTEMBER 2022

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## EXECUTIVE SUMMARY

In accordance with the policies, objectives and methodology of ENQA, a review of The Hellenic Authority for Higher Education (HAHE) was carried by a panel constituted by ENQA for that purpose.

The purpose of the review was to evaluate the application of HAHE for a renewal of its ENQA membership and for registration with EQAR. In 2015, the agency accredited for the first time was called The Hellenic Quality Assurance and Accreditation Agency (HQA). HAHE is the successor agency, established under Greek legislation (Law 4653/2020). Its legal establishment required it to continue the functions of HQA and added additional functions in respect of strategic planning and funding decisions in Greek Higher Education (HE).

The review commenced with the agreement on the terms of reference for the review in May 2021. The review panel was established in October 2021 and met on-line in November to commence its work. A site visit was scheduled for Athens, but this had to be changed to an on-line visit because of the resurgence of COVID-19 in late 2021. The on-line site visit took place in early February 2022 and the final draft of the review report was submitted to ENQA in May 2022.

HAHE is charged with the quality assurance of the public higher education (HE) system of Greece. In addition, it now has a role in informing the funding decisions of the Ministry for Higher Education and in advising on national strategy. It is the only state agency operating in the field of quality assurance in Greece and all public higher institutions are legally required to undergo periodic assessment and accreditation under the auspices of HAHE. In its self-assessment document (SAR, p. 17), HAHE outlined its mission: *“The HAHE, in the context of its mission: a) contributes in the formation and implementation of the national strategy for higher education and the distribution of financing for Higher Education Institutions (HEIs) and b) evaluates and accredits the operational quality of Higher Education Institutions (HEIs).”* This tripartite mission is legally based.

HAHE also reports on the performance of the system to the Ministry for Education and the Greek parliament. This is done through the production of an annual report. This substantial annual report is heavily based on quantitative data and the collection, warehousing, and collating of this data occupies a lot of the resources of HAHE.

HAHE also makes recommendations on national strategy to the Ministry for Higher Education, based on the evidence presented in its annual report.

The review panel considered the SAR prepared by HAHE, reviewed all supporting material, examined the website of the agency and requested supplementary material as part of its preparation. The review panel then had a briefing meeting with the HAHE contact person (i.e., Director General of the agency). She gave the panel a presentation outlining the context of Greek higher education, the history of quality assurance in Greece, the establishment of HAHE as the successor agency to HQA and the issues arising from the transition from one agency to another.

The review panel considered carefully all the different sources of information available to it and held a series of meetings during the on-line site visit that assisted their understanding. In addition, the review panel had an additional clarification meeting with HAHE contact person before it reached its conclusions.

The review panel notes that the resurgence of COVID-19 pandemic changed the original planned site visit to an on-line visit at a late stage in planning and thanks all involved for making the switch work so well. However, the review panel does feel that corporeal visits still hold the advantage in informing a review panel's deliberations.

The review panel also had to deal with the effective transformation of one agency and the establishment of another and this did cause some dis-continuities in documentation, narrative and evidence. This will be a consistent and important thread in the narrative and analysis contained in this report. The review panel is also conscious of the impact of the changed scheduling of the review of the agency from 2020 to 2022. The cancellation of the original review was made at the request of HAHE because of the transition from HQA to HAHE. In effect, the review panel had the impression that it was dealing with two quite different entities in HQA and HAHE. The difference is emphasised in the on-line existence of two separate sub-pages on the agency website.

The panel reached the following conclusions in respect of compliance with the ESG (2015) Standards and Guidelines:

<b>ESG</b>	<b>Panel's decision</b>
2.1 Consideration of internal quality assurance	Compliant
2.2 Designing methodologies fit for purpose	Partially compliant
2.3 Implementing processes	Compliant
2.4 Peer-review experts	Not compliant
2.5 Criteria for outcomes	Compliant
2.6 Reporting	Compliant
2.7 Complaints and appeals	Partially compliant
3.1 Activities, policy and processes for quality assurance	Compliant
3.2 Official status	Compliant
3.3 Independence	Compliant
3.4 Thematic analysis	Partially compliant
3.5 Resources	Partially compliant
3.6 Internal quality assurance and professional conduct	Partially compliant
3.7 Cyclical external review of agencies	Compliant

In light of the findings, the review panel concluded that HAHE was in partial compliance with the ESG2 2015.

# INTRODUCTION

This report analyses the compliance of the Hellenic Authority for Higher Education, [(HAHE) and its predecessor, The Hellenic Quality Assurance Agency for Higher Education, (HQA) (from 2015-2020), with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in 2021/2022, commencing in September 2021 and concluding in May 2022. This review was conducted virtually because of the restrictions imposed by the COVID-19 pandemic. This review was originally scheduled for January 2020 but was deferred at the request of the agency, following its transformation to HAHE, and with the agreement of ENQA. Originally, the review was planned in 2020 with a site visit planned for February 2020 but this was changed to a review in 2022, with a virtual site visit to the agency in January 2022.

## 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 compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

HQA was reviewed in 2015 and the Board of ENQA concluded that HQA was in substantial compliance with the ESG. HQA was not listed on the European Quality Assurance Register (EQAR).

As this is HAHE's second review (based on the assumption that HQA and HAHE are the same entity), the panel endeavoured to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

In the interests of clarity, the review panel calls attention to the name change of the agency. HQA became HAHE in 2020 as a result of legislative change that was passed in 2019. It should be noted from the outset that the legislative change has resulted in the existence now of a HQA legacy section on the current HAHE website. The website now has distinct HQA and HAHE pages. Material pertinent to this review and its findings had to be found on the two different sections and there is no automatic linking of congruent material. This caused difficulties for the review panel.

### SCOPE OF THE REVIEW

HAHE is legally responsible for the periodic accreditation of all internal quality assurance systems (IQAS) of the public higher education institutions (HEIs) in Greece. It is also legally responsible for the accreditation of all study programmes including undergraduate (USP), postgraduate (PSP), foreign language (FLSP) and life-long and distance learning programmes. The evaluation of the internal QA units (MODIPs) began under the auspices of HQA as these must be completed by the HEIs in advance of seeking programme accreditation. An anomaly in respect of the programme accreditation requirements only taking place in the aftermath of IQAS has arisen as a result of the large-scale mergers of HEIs in Greece since 2018. This will be outlined in greater detail in the report.

At the date of the review in February 2022, HAHE had not started the process of accrediting post-graduate programmes. The review panel was informed that 1600 post-graduate programmes are scheduled for review over a 4-year period. There is no review process in place for life-long and distance learning in the public HEIs (see section 3.5, footnote 4 of SAR) and in the SAR this statement is applied to the Hellenic Open University. The Minister for Higher Education informed the review panel that the HAHE remit did not extend to the Open Hellenic University. This was corrected by HAHE as part of

its factual check of the draft report. HAHE states that the Hellenic Open University is subject to HAHE and that the relevant reports are to be found on the HAHE website. The review panel sought information on a small number of programmes described on EURYDICE as third level in non-university institutions and were informed that they are legally outside the scope of HAHE activity. Foreign language study programmes (FLPs) are a recent development in Greece. A small number of foreign language programmes (two) in medicine have been accredited. The review panel was informed initially by the Minister for Higher Education that joint programmes will be accredited in the future. HAHE contact person informed the review panel that no joint programmes with HEIs in other countries had been accredited to date.

The legal establishment of HAHE in 2020 transferred the functions and responsibilities of HQA to HAHE and added additional functions in strategic planning and funding decision-making. These fall outside the scope of quality assurance remit but, as they do impact on how HAHE conducts its activities in QA, they will be referenced in the document when appropriate.

## MAIN FINDINGS OF THE 2015 REVIEW OF HQA

An ENQA review of HQA took place in 2015. This review used the ESG 2005 and therefore the findings and recommendations do not align in all instances with the similarly numbered standard in the ESG 2015. In addition, the letter sent to HQA confirming membership by the Board of ENQA amended the findings of the review panel for a number of standards. The following table summarises the main findings of the 2015 report (based on ESG 2005), the changes to findings made as a result of ENQA Board scrutiny and the corresponding aligned standard in the ESG2 2015.

<b>2005 Standard</b>	<b>2015 report finding on compliance with ESG 2005</b>	<b>2015 final judgments from Board of ENQA</b>	<b>2015 aligned standard(s)</b>
3.1 Use of external QA procedures for HE	Substantial	Same	3.1
3.2 Official Status	Full	Same	3.2
3.3 Activities	Full	Same	3.1
3.4 Resources	Substantial	Full	3.5
3.5 Mission Statement	Full	Same	3.1
3.6 Independence	Full	Same	3.3
3.7 External QA criteria and processes used by the agencies	Substantial	Partial	2.3, 2.4, 2.5, 2.7
3.8 Accountability Procedures	Partial	Substantial	3.6, 3.7

ENQA Criterion 8 <sup>1</sup>	Substantial		
2.1 Use of Internal QA	Full	Same	2.1
2.2 Development of external QA processes	Full	Same	2.2
2.3 Criteria for decisions	Substantial	Full	2.5
2.4 Processes fit for purpose	Substantial	Same	2.2
2.5 Reporting	Full	Same	2.6
2.6 Follow-up procedures	Substantial	Partial	2.3
2.7 Periodic reviews	Substantial	Same	3.7
2.8 System wide analysis	Substantial	Full	3.4
ENQA criterion 8.I	Substantial	Partial	
ENQA criterion 8.II		Non-compliant	

The 2015 review report concluded:

*“In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, HQA is in **substantial compliance** with the ENQA Membership Provisions.*

*The panel therefore recommends to the Board of ENQA that HQA should be granted Full Membership of ENQA for a period of five years. The Panel would also recommend that HQA be asked to submit a progress report after either one or two years following consideration of this report.”.*

The panel noted in its report:

*“Overall the Panel believes that the Agency has engaged purposefully and made realistic progress with the agenda legally assigned to it, given the financial constraints under which it operates. The Panel was impressed by the energy and commitment of HQA’s staff.”.*

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<sup>1</sup> ENQA Criterion 8 refers to previous ENQA membership criteria, where apart from ESG 2005 ENQA had an additional Criterion 8: “ENQA criterion 8 - Consistency of judgements, appeals system and contribution to ENQA aims:

- i. The agency always pays careful attention to its declared principles, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups,
- ii. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency.
- iii. The agency is willing to contribute actively to the aims of ENQA”.



Subsequently, the Board of ENQA considered the review panel report and issued its determination accompanied by a letter that outlined a number of issues it wished to bring to the particular notice of the agency. It determined that HQA was in “substantial compliance” with the ESG and added: “**the Board noted some areas for development, some of them causing serious concern. In order not to jeopardise the outcome of the next external review, your Agency is therefore urged to make the necessary arrangements in those areas.**” [emphasis added].

In its letter, the ENQA Board calls particular attention to the absence of students on site visits and the absence of an appeals procedure. The notification continues:

“These are two serious issues. **The Agency is advised to promptly address these weaknesses as the revised ESG will be more challenging in terms of student involvement and appeals** [emphasis added]. In addition, there is no formal external follow-up with respective actions.”.

In 2017, HQA submitted a follow up report and the ENQA Board issued a letter in response containing the following paragraph:

“I would like to take this opportunity to remind you that as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) were adopted in the Ministerial Conference in May 2015, we expect that all ENQA Members have by now incorporated ESG 2015 into all relevant procedures. **In this regard for HQA, the ENQA Board strongly recommends that specific attention should be paid to ESG 2.4 Peer-review experts, as student participation in the review panels remains insufficient.**” [emphasis added].

A summary of the recommendations made in 2015 is included here as it is more useful to see them as a group in view of the changes between the 2005 and 2015 ESG:

### Summary of recommendations

The Panel makes a number of specific recommendations to HQA. These are:

- HQA continue its work designed to further strengthen its arrangements for ensuring consistency of reporting.
- That HQA continue to explore alternative mechanisms for ensuring a stronger student voice in its external review procedures and for the inclusion of a larger number of experts from outside the Greek speaking communities.
- That the responsible Greek bodies consider whether full responsibility for consideration of follow-up reports should rest more directly with HQA as part of a more structured and transparent follow up process.
- The Panel recommends that the new programme of work be carefully planned, phased and monitored, so as to ensure its timely delivery.
- That HQA consider how the outputs from its review activities can be further focused to support system-wide analysis and institutional quality improvement and enhancement.
- The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase its resources for this purpose. The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which HQA can undertake.
- That HQA be encouraged to develop and pursue its strategy for maintaining and increasing its resources (including those for staffing, finance, hardware and software), in order both to maintain its programme of work and also to develop its capacity for sector-wide analysis.

- The Panel recommends that discussions be pursued with the Ministry of Education so as to permit student representation on HQA review panels and to facilitate a review mechanism for panel decisions in line with best practice set out in the ESG.
- Given the growth in HQA activity it may now be timely to formalise aspects of HQA's internal feedback arrangements; the Council should consider this in consultation with the Director General.

The specific matters raised in the 2015 report and the subsequent correspondence in 2015 and 2017 are of concern again in 2022.

## REVIEW PROCESS

The 2022 external review of HAHE 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 HAHE was appointed by ENQA and composed of the following members:

- Bernard Coulie (Chair), Full Professor and Honorary Rector, Université Catholique de Louvain, Belgium (EUA Nominee);
- Marion Coy (Secretary), Former President, Galway-Mayo Institute of Technology, Ireland (ENQA Nominee);
- Klemen Subic, Secretary, Head of Department of International Cooperation and Information Technology, Slovenian Quality Assurance Agency, Slovenia (ENQA Nominee);
- Liv Teresa Muth, Member of the European Students' Union Quality Assurance Student Experts Pool, Belgium (ESU nominee).

Goran Dakovic (ENQA Reviews Manager), acted as the review coordinator.

The review panel paid particular attention to the four principles that underpin ESG 2015. They are:

1. That the primary responsibility lies with HEIs for the quality and QA of their provision;
2. That QA needs to respond to the diversity of HE systems, institutions programmes and students;
3. That QA needs to support the creation of a quality culture;
4. That QA takes into account the needs and expectations of students, other stakeholders, and the society.

In November 2021, the review panel members were introduced to each other and were sent a comprehensive collection of briefing material, including all ENQA documents, the SAR prepared by HAHE, and material related to the SAR. The review panel members were encouraged to familiarise themselves with this material and to prepare a list of preliminary observations and queries.

A briefing meeting for the review panel then took place on-line on December 16th, 2021. For the first part of the meeting, two representatives from EQAR attended to discuss the related terms of reference and overall expectations of the review. Then the review panel was given an overview of the process by the review coordinator, Goran Dakovic. The chairman then outlined the possible next steps in the procedure and sought the views of the panel members. It was agreed that each panel member would complete the mapping grid of issues and questions identified from the SAR and send them to the secretary. This was done and a consolidated mapping grid was then developed.

At the briefing meeting, the chair also asked that each panel member identify any additional material required and any gaps in the information. Once this was done a request was sent to the HAHE contact person for additional documentation or links to the apparent gaps. It was evident from an early stage that the HAHE website was essentially populated with material from 2019 forward and it was not always easy to identify where material from 2015-2018 was to be found.

The secretary also prepared a draft schedule for the site visit. This was reviewed and amended by the chair and then HAHE was asked to fill in the schedule and to revert to the secretary if any issues arose. The principal issue that emerged immediately was around the panel request to meet students that had been involved in agency reviews. HAHE contact person came back to say that no students had participated. The secretary then sought the creation of a panel of students that had been involved in the internal QA units in the HEIs. This was not done, and the only students offered for the review panel to meet were the two students who had served, one at a time, on the Evaluation and Accreditation Council (EAC) of HAHE.

The review panel had a private meeting on January 21st 2022 at which it considered the issues to be addressed during the on-line site visit. This was followed by a meeting with the HAHE General Director, who was also the agency contact person for the review panel. HAHE contact person used a PowerPoint presentation to brief the review panel on the national context with particular reference to the legislative changes that had occurred since 2015. These changes included a large programme of institutional mergers, changes in funding mechanisms, a restatement of the autonomy of HEIs, and the establishment of HAHE itself.

The review panel then held its on-line meetings with regularly scheduled internal reviews of what had been learned and what needed additional exploration. At the final meeting the Chair of the panel gave an overview of the visit and made a number of important observations. He noted that the panel had learned a lot from the meetings and that this was compensated for some of the gaps in the SAR and in the discontinuities arising from the fact that this review was essentially a review of two different entities, HAHE and HQA. He mentioned the difficulties the panel encountered on getting clear information on some topics. He referenced the expanded mission of HAHE and explained that the panel saw links between the elements of mission that impacted on QA. He went on to state that the panel had got clear evidence that the new role of HAHE was clearly recognised by all actors and that the competence and credibility was also widely recognised. As a consequence, the expectations of others from HAHE are now much higher. It is seen by them as a central actor in HE in Greece and is expected to ensure stability and continuity in the future. He told the meeting that the review panel had been impressed by the enthusiasm of the HAHE staff members they met, by the dedication to the mission of the agency and by their intimate knowledge of the Greek HE landscape. In its changing environment where there is still much change taking place, the panel Chair suggested that it was more important than ever for HAHE to formalise its procedures, structure, and governance. He stated that renewed effort needed to be put into establishing a sustainable long-term funding base for HAHE in order to reduce its over-reliance on short-term contracts. He said that HAHE must deal as a matter of urgency with bringing all stakeholders on-board - especially student representatives. He noted the work done on building a reliable source of quantitative data and said that data now needed to be utilised in transversal analysis. In respect of its internal culture, the review panel observed that the mission transformation of HAHE was very significant and that this was well appreciated by the SC and General Director. He felt that more could be done to ensure that all others in HAHE had an opportunity to reach the same level of understanding. He concluded by remarking that HAHE is clearly on the right path and that there are more stages in its journey to be completed. He expressed the regret of all the panel members that they had not been able to do their work in Athens.

## Self-assessment report

The self-assessment report (SAR) of HAHE was prepared and submitted as part of HAHE's application for membership renewal in ENQA and registration in the European Quality Assurance Register of Higher Education (EQAR).

The SAR document describes the preparation of the SAR as “the collective endeavour” of a working group appointed by the HAHE Supreme Council (SC) (the governing authority of HAHE); the group is named in a footnote (p. 5) as *the head and a staff member from the Quality Assurance and Accreditation Department and two “external collaborators”*. The group prepared the SAR report under the guidelines and coordination of the General Director.

The agency states that the preparation of the SAR took eight weeks, involved “wide engagement and contribution in multiple areas”, stakeholder feedback on “distinct sections of the report” and was reviewed by the Supreme Council.

The review panel established in the course of its meetings that the process for developing the SAR commenced in 2019 in anticipation of a review in 2020. When this review was re-scheduled, it would appear that the 2019 document was amended to reflect some changes but there was no substantial engagement in its development by the agency staff, by stakeholders or by the Evaluation and Accreditation Council (EAC). When asked about their involvement in its preparation, the staff of the agency described it as the work of the President and the General Director. The members of the SC confirmed that they were consulted in the final review of the document.

The SWOT analysis included in the SAR is the one prepared in 2019 and the panel sought an up-dated version which was supplied in December 2021. The updated version has no details on who was involved in its preparation and was not referenced by any staff members in their meetings with the review panel.

The review panel sought additional information on the funding of HAHE as it was difficult to establish the position from the material contained in the SAR. The review panel also sought clarification on a range of other issues including the absence of coverage in the SAR on follow-up procedures, clarification on the dates at which some legislative change took effect, greater detail on what is described in the introduction to the SAR as “a turbulent period for the Greek higher education” (p. 5).

The review panel found that the SAR raised a lot of issues that were not addressed in the document itself. One of the reasons for this became clear once the review panel understood that the document was based in large part on what had been prepared prior to the decision to seek a re-scheduling of the ENQA review. As a consequence, insufficient attention was given to ensuring that statements in the SAR were reviewed to ensure their contemporary accuracy. For example, in relation to admission of students to programmes, the SAR (p. 13) states, *“The number of admitted students per study programme is determined centrally by the Ministry of Education and Religious Affairs, a fact which constitutes a significant weakness of the Greek higher education system. Usually there are more students admitted per study programme than the number of available positions. This impacts negatively on the quality of students’ learning experience.”*. This practice had been modified since that statement was written but that only became known to the review panel as a result of questions raised by them at meetings with the Minister and the rectors of the HEIs. In addition, the SAR (p. 12) makes a reference to Law 4277/2021 but without any precision regarding its implications for the admission of students.

The review panel found that the SAR contained full details of the procedures used by HAHE, taken in most cases directly from the HAHE Quality Manual, but the SAR is light on evidence-based analysis, reflective thinking, or qualitative and enhancement-focused commentary. The presentation of material in the SAR is disjointed and insufficiently linked to the section headings. More use could have been made of hyperlinks to supporting material and that would have enabled more emphasis on analysis and reflection in the SAR.

The briefing presentation made by HAHE contact person to the review panel was of great assistance and much of the material could usefully have been incorporated in the SAR.

### **Site visit**

The on-line site-visit took place from 1st-3rd February 2022 (incl). The panel held a private meeting in advance to agree the main areas for discussion at each scheduled meeting and to agree on any further requests for additional information.

The schedule of meetings is included in the appendices. The review panel met the President and some members of the Supreme Council, The Minister for Education and Religious Affairs and her senior officials, and members of the Evaluation and Accreditation Council at its first three meetings. These three meetings provided a wide-ranging overview of the changes that had taken place since the 2015 review. For example, the Minister for Higher Education described the changes that had taken place to deal with numbers of students being admitted to programmes. This was not covered in the SAR.

At all three meetings it became apparent very quickly that there was a consensus among those whom the review panel met about the difficulties they perceived in including students in a meaningful way in QA. The Minister for Higher Education stated that it was up to the students and not up to the Ministry to take initiatives in order to set up a student organisation. Other common threads included the importance of the HAHE work on creating verifiable information that could be used for funding decisions, the centralised nature of the HE system, the view that much had changed as a consequence of the legislative changes since 2019 and very little comment on the pre-2019 situation. The review panel also got a strong sense that the embedding of QA in HEIs had been a struggle. The President of HAHE commented that “HEIs believe in QA now”.

The review panel met the Heads of the Directorates of HAHE and at this meeting the issue of funding came to the fore. The Head of Finance stated that HAHE had “adequate and sufficient funds” to meet its requirements, a very different view from that expressed in the SAR. At this meeting the review panel got further information on funding sources and allocations in the work of HAHE. At the end of this meeting the panel decided to seek further clarifications on funding.

In respect of their involvement in the preparation of the SAR, three of those listed in the SAR were in attendance at one meeting. They said they had participated but questions were answered exclusively by one attendee. When asked who prepared the SAR, this group agreed that it was the work of “the Supreme Council and the General Director”. They were unfamiliar with the contents of the SWOT analysis in the SAR.

At this meeting the review panel came to understand the very heavy emphasis on quantitative data in the work of the agency and this was reinforced throughout the on-line site visit.

When asked about the strategic planning function of the agency, the Heads of Directorates group stated that “It was recently established and newly operating”. Many of the responses from this group (the Heads of Directorates) referenced ministerial authority as dictating many work requirements.

The issue of the internal quality assurance procedures in HAHE came to the fore at this meeting.

At an early stage in the on-line visit, the review panel was able to outline a set of key issues that required further attention from the review panel. These included:

- the balance between emphasis on quantitative and qualitative data in the work of HAHE;
- the approach to enhancement as a key principle in QA;
- the lack of formalised, written procedures for the internal structures of HAHE;
- the lack of a whole-of-agency approach to the development of the SAR;
- the absence of meaningful student participation;

- gender balance on foreign expert register and panels;
- funding clarity;
- the consequences of handling multiple missions;
- stakeholder communication;
- internal communication.

The review panel also got a strong sense of alignment between the Ministry and HAHE, a strong sense of purpose from the president and General Director and a conviction from all those met by the review panel in its first three meetings that the changes since 2019 were beginning to show results.

In its remaining meetings, the review panel had opportunities to explore these and other issues that emerged with a range of internal and external stakeholders. The strong positive message from all these meetings was that HAHE was “a trusted intermediary” playing an important role in an evolving situation.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

Based on article 16 of the Greek Constitution, HE is provided only by public institutions, under the supervision of and financing by the Ministry of Education and Religious Affairs. According to Law 4485/2017, higher education comprises two distinctive sectors: a) the university sector that includes Universities, Technical Universities, and the Athens School of Fine Arts and b) the technological sector that includes Technological Education Institutions (TEIs) and the School of Pedagogical and Technological Education (ASPETE). As a consequence of recent mergers and restructuring of the Greek higher education system (Laws 4521/2018, 4559/2018, 4589/2019 and 4610/2019), Greece now has 24 Universities and 1 TEI.

This process of restructuring was the subject of comment in the SAR and was raised by participants in meetings with the Minister for Higher Education, the President and Supreme Council of HAHE, the Evaluation and Accreditation Council of HAHE, the rectors and vice-rectors of QA units from the HEIs, other state agencies associated with HE and research and was extensively covered in the briefing meeting held with the General Director of HAHE.

In the SAR (p. 7) the following statement appears: *“It is worth noting that 11 out of 25 higher education institutions changed their structure as a result of merging with former Technological Education Institutions (see Table 1 and section 3.7). This was a political decision taken by the Ministry of Education and Religious Affairs without consultation with the Authority (as it should) or evidence (feasibility studies, predefined criteria) covering the requirements for a successful merger in the field of higher education. It has to be pointed out that all new study programmes that were established at that time (in 2018 and 2019) are in the process of quality accreditation (in 2022).”*

The Minister for Higher Education described the restructuring process as a key component of national strategy. The review panel established that HAHE is still dealing with the accreditation of programmes that were merged under this process. The programmes have operated without the process being completed and this was explained to the panel as a pragmatic solution to dealing with students who were already enrolled on separate programmes in advance of the mergers.

The snapshot of Greek HE in the SAR (p. 13) relates to 2019: *“During 2019, Greece has continued to increase the proportion of higher education graduates in its population, while at the same time offering the latter reduced employment prospects and relatively low earnings, as compared to EU and OECD countries. In addition, several quality issues persist, such as a high student-to-staff ratio, low graduation rates, low public*

*funding, and low teaching staff renewal ratios. In terms of these indicators, the country's position is unfavourable, also due to the high percentage of inactive students in the student population.”* During its meetings, the review panel heard a more positive statement from the Minister for Higher Education in respect of changes to unregulated access to programmes, the creation of minimum entry standards, improvements in government funding, the development of labour market tracking mechanisms and the establishment of joint degrees with HEIs in the EU, the US, UK, and China which were later clarified as institutional level partnerships. (At a subsequent meeting, the general director told the panel that there were no jointly accredited programmes.)

## QUALITY ASSURANCE

Quality assurance in HE was established for the first time by Law 3374/2005, whereby a single, nationwide ongoing evaluation process was established, aimed at stock-taking, analysing, and systematically assessing teaching and research work, study programmes and other services of HEIs. The same Law established the Agency for Quality Assurance and Accreditation in Higher Education (HQA) as the responsible body for quality assurance in higher education. It should be noted that even before the establishment of HQA, several Greek higher education institutions and study programmes had been evaluated during the 90s. This was possible either through the external evaluations of the European University Association (EUA) or through special programmes supported by European funds.

In its early years HQA drafted a framework for its work, developed a registry of foreign experts, and consulted with the rectors of the HEIs. The SAR (p. 26) states that the agency was not “as active as would be expected” and that many planned activities were delayed initially because of funding, cultural and staffing issues. It began its first proper cycle of accreditation in 2008. From 2010, HQA had additional resources available from EU funding sources.

From 2011, HQA had the additional responsibility of accrediting internal quality assurance units of HEIs but its work on both programme and system evaluation and accreditation continued to be hampered by lack of funding.

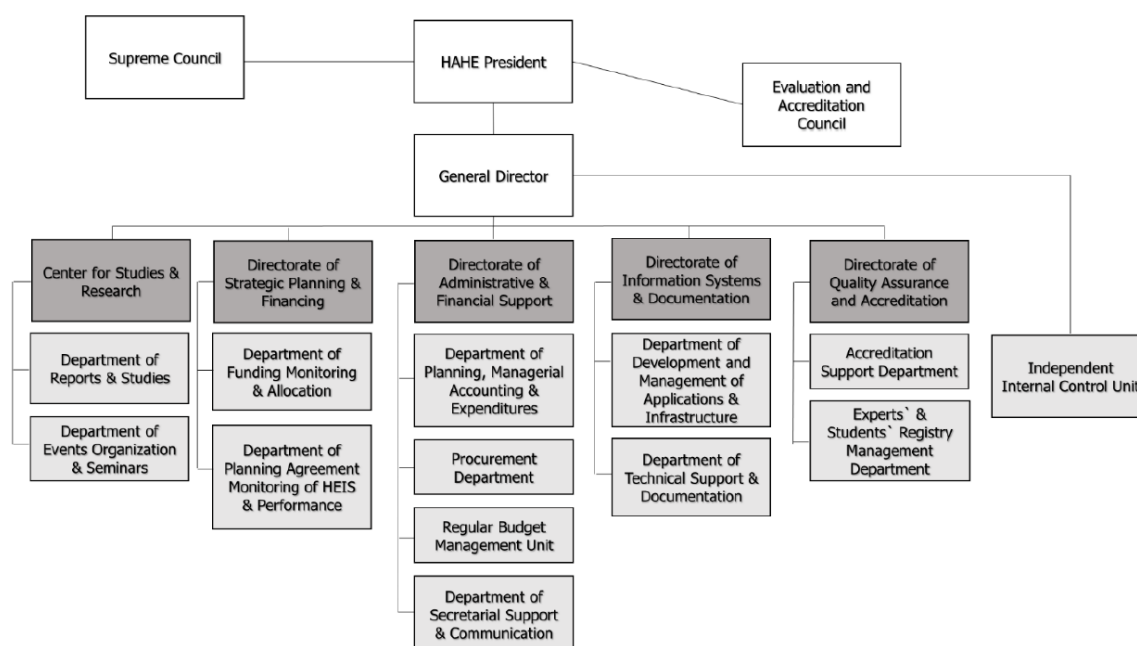
## HAHE

HAHE was legally established in 2020 (Law 4653/2020) as the successor agency to HQA. Its mandate covers all the quality assurance functions previously carried out by HQA.

The new legal framework that underpins the operation of the HAHE (Law 4653/2020) refers to a) the thematic evaluation of higher education institutions as well, which consists of a systematic, substantiated, and detailed assessment, promotion and listing of the work done by higher education institutions or their academic units through the use of objective criteria, as well as in the critical analysis and identification of any existing weaknesses and deviations from their academic character, objectives and mission, and b) the designation of Centres of Excellence, namely academic units characterised by exceptional quality in teaching and research in accordance with specific criteria.

A process has been created for establishing Centres of Excellence. There are three stages: 1. Setting the criteria; 2. Issuing a call for submissions; 3. Evaluation of submissions. Stage 1 has been completed and stage 2 is underway.

## HAHE'S ORGANISATION/STRUCTURE



HAHE operates through two main supervisory boards: the Supreme Council and the Evaluation and Accreditation Council.

The functions of each council were clearly outlined by HAHE contact person in her PowerPoint presentation to the review group and are outlined in the table below.

Supreme Council (SC)	Evaluation and Accreditation Council (EAC)
Formulation and Implementation of National Strategy	Accreditation of IQAS and Study Programmes
Work Programme Agreements	Accreditation of New Study Programmes
HEI Performance Based Funding	Thematic Evaluation
Graduate Tracking Mechanism	

The President of the Supreme Council is appointed by decision of the council of ministers of the Greek government and chairs both councils (SC & EAC). The General Director heads up the administration of HAHE and reports to the President. The vice-president is selected by the appointed members of the SC from their own membership.

The 5 members of the Supreme Council are appointed as a result of an open call for applications. An evaluation procedure is established, and the list of shortlisted candidates is forwarded to both the Ministry and the rectors of the HEIs. If three quarters of the rectors object to a specific candidate within five days from the date of notification, said candidate shall be deleted from the classification list and replaced by the following candidate in the list. The Minister for Education and Religious Affairs shall, as per the final classification list, appoint the other four members of the Supreme Council by a decision to be published in the Hellenic Government Gazette.



The president and the vice-president of the Supreme Council have a four-year term and the members are appointed for 5 years.

The EAC is composed of the President of the SC and eight members, six from the teaching and research staff of HEIs selected from a range of disciplines, a student representative and a representative from the technical/economic chambers of Greece. In 2021 and 2022, a student member was selected by lottery from the registry established by HAHE for the first time in 2021.

The EAC is obliged to hold its inaugural meeting within fifteen days from the date of publication of the decision on the appointment of its members in the Hellenic Government Gazette. In the event that a student fails to participate, or that the Technical Chamber of Greece, the Geotechnical Chamber of Greece and the Economic Chamber of Greece fail to propose a joint representative, the quorum of EAC meetings, which is necessary for establishing its lawful setup and adopting decisions on any agenda item, shall be calculated on the basis of the rest of its appointed members.

The president and the vice-president of the EAC serve a 4-year term, the other members have a 6 year term, except for the student member who has a 1 year term.

Members of the SC and EAC may hold no more than two terms of office, whether consecutive or not.

The HAHE councils are assisted by the administrative functions of the agency and their operation is managed by the General Director. The General Director position is filled by way of open competition, administered by the SC and a General Director appointment is for 4 years.

The administrative structure is also legally determined (Law 4653/2020) and consists of Directorates for Quality Assurance, Strategic Planning and Financing, Information Systems and Documentation and Administrative and Financial Support. There is also a functional area called The Studies and Research Centre and a separate unit responsible for Internal Audit.

The SAR (9.5.2) refers to 45 statutory administrative and scientific support posts in the agency and to the fluctuating number of contracted short-term posts. The SAR states “The understaffing of the HAHE is a problem associated with both budgetary constraints and ineffective staffing and transfer procedures” (p. 49). Not all of these posts work directly on accreditation. At its meeting with the Director General, the number of people working directly in accreditation was mentioned as 7. In addition, the Director stated that HAHE anticipated a need for a further additional 15 posts to cover the work programme of the next two years.

## HAHE’S FUNCTIONS, ACTIVITIES, PROCEDURES

In relation to external evaluation and accreditation to date, HAHE (and its predecessor HQA):

- has implemented the external evaluation of 397 academic units of the Greek HEIs, with the contribution of 1.580 faculty members from foreign institutions (2008-2014),
- has implemented the external evaluation of 36 Greek HEIs (October 2015-July 2016),
- continues the accreditation of Internal Quality Assurance Systems and undergraduate study programmes of the HEIs across the country. Until the end of 2020, 22 IQAS and 142 study programmes had been accredited.

The following table lists the QA Activities of HAHE:

IQAS Accreditation	4-year cycle A prerequisite to study programme accreditation
Study Programme Accreditation	4-year cycle
New Study Programme Accreditation	4-year cycle (including merged programmes arising from institutional mergers)
Foreign Language Programme Accreditation	4-year cycle (Refers to programmes of study provided through a language other than Greek)
Recognition of Centres of Excellence	(Has just commenced so none recognised at date of review.
Follow-Up reviews	As defined for each activity

Further to the above, the HAHE maintains a Registry of around 4.700 experts (academics and stakeholders) for the appointment of evaluation and accreditation panel members. A registry for undergraduate students was put in place in June 2021 arising from the changes in legislation introduced in January 2020 (the final legal provision concerning the participation of students was voted in June 2020, Article 13, 1,b of Law 4653/24.1.2020, as it has been modified by article 8, 2,b of Law 4692/12.6.2020). This registry has a one-year life. At the time of the panel visit, no student experts had been used on panels, HAHE also indicated that it plans to recruit students to a post-graduate student register.

In 2018, HAHE, following a public call for proposals for accreditation to the institutions, completed twelve (12) Accreditations of Internal Quality Assurance Systems (IQAS) and nine (9) Accreditations of Undergraduate Programs (USP) of HEIs. The preparation of accreditation as a quality assurance action took over two years and involved both the development of the relevant accreditation material and the organisation of the relevant procedures while informing and supporting the HEIs. In addition, during 2018, the institutions were invited by HAHE to submit their Follow-up Reports on improvements made from the previous external evaluation up until the first half of 2018 (two years after the last evaluation had been completed). HAHE analysed the reports and developed consolidated reports using EU funding. In the same year, the Institutions submitted the annual quality data of their activities to the National Information System for Quality Assurance (NISQA). These have been processed by HAHE through the development and monitoring of the appropriate indicators for measuring and evaluating academic activity.

During the following years, the SAR stated that 10 IQAS and 133 Undergraduate Study Programmes were accredited, initially by HQA and then HAHE. In additional information supplied to the panel following the site visit, these figures were updated to 30 IQAS and 243 USP accreditations.

HAHE and HQA international activities are described in the SAR (7.1.10). HQA became a member of The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) in 2014. Since becoming a member of ENQA in 2015, HQA and then HAHE has participated in forums organised by ENQA. In 2016, HQA, in cooperation with ENQA, organised in Athens a conference entitled “The Social Dimensions of Learning - Meeting QA Challenges”.

In 2019, HQA attended the Balkan University Association Conference hosted by the Aristotle University in Thessaloniki.

Initial discussions were held with the QA agency of Cyprus in 2019 with a view to establishing future cooperation.

## HAHE'S FUNDING

The Authority is financed through (1) the "Regular Budget" and (2) the National Strategic Reference Framework (NSRF) programme, "Education and Lifelong Learning" which is part of the EU structural fund. The regular budget comes from the national exchequer on an annual basis. The NSRF funding is based on approved project funding and is drawn down over the duration of the project which may extend beyond a single budget year.

The review panel had difficulty understanding the presentation of budget material in the SAR and sought additional documentation, clarifications from the General Director and additional clarifications from the Head of Finance.

On the basis of this examination, it became apparent to the review panel that effectively HAHE is operating on 50% of its expenditure coming from national exchequer funding. This allocation is given to the agency on the basis of an annual submission of a request for funding and it is used to pay the administrative staff. All the funding required to carry out the evaluation and accreditation activity comes from EU funding, and this now accounts for 50% of the total agency funding. The EU funding is used to pay for what HAHE call "external partners". These are staff contracted on renewable short-term contracts to meet the requirements of the EU funded projects. The contracts vary in duration from three - sometimes six months and there is a performance review after 2 months.

The Minister for Higher Education stated that there had been a 20% increase in the funding allocated by her department to HAHE year on year in each of the last 2 years. In the SAR the increase from 2019 to 2020 is described as "marginal". In addition, the SAR (p. 49) states that between 2010 and 2015, the agency budget had decreased by 45% so that any subsequent increases need to recognise that budget cut. In its description of annual activity, the SAR (p. 24) states that no review activity was carried out in 2017 because of inadequate financial and human resources.

# FINDINGS: COMPLIANCE OF HAHE 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

The evidence, analysis and findings reached for ESG 2.1-2.7 in this document should be read in conjunction with this section of the report.

HAHE does undertake external quality assurance activities as defined in part 2 of the ESG. The activities outlined in the SAR include all the procedures and stages of all undergraduate programme reviews, and internal quality assurance system reviews. It is a legal requirement that HEIs have an approved internal quality assurance system in place before it seeks accreditation of programmes. The review panel learned from the President of HAHE and from the rectors of the HEIs that two foreign language programmes in medicine had been accredited and that there was substantial demand for the programmes offered in English. Fees apply to these programmes.

The review panel examined the translation of the agency's policy and objectives into its daily work. It learned that HAHE has a detailed work scheduled and an electronic system for recording the output of its employees. The stages of each accreditation follow a pre-determined plan that is documented. The documentation that covers all the agency procedures is published on its website. There is also an internal procedure that follows a pre-determined series of stages in each evaluation and accreditation activity.

All standards and guidelines for programme and quality system evaluations are published and are available on the HAHE website. The rectors and vice-rectors told the review panel that they were "regularly informed" of planned policies and procedures.

At the time of the panel on-line visit in February 2022, no accreditation of post-graduate programmes had taken place. The panel learned from its meetings with the Director General of HAHE and the vice-rectors for quality assurance in the HEIs that 1600 post-graduate programmes require evaluation and accreditation. The proposed time frame is the next four years, commencing in semester 2 of 2022. The review panel asked the vice-rectors about the policies and procedures that were being developed for post-graduate programme reviews. The vice-rectors had not had sight of these proposed procedures at the beginning of February. The staff of HAHE stated that the procedures would essentially be those already in existence for other programmes with "1 or 2 additions". In response to questions from the panel about testing in advance, the staff did not see any need for this to take place.

It is proposed also to review and accredit new study programmes created by the mergers of institutions and HAHE has developed a different accreditation standard for them. The call for submissions for these reviews was issued in 2021.

As part of her PowerPoint presentation on the context of Greek HE (link in annex 4), HAHE contact person stated that *“the restructure of the HE map have been planned without criteria, documentation and prior consultation with HQA”*. The review panel learned from the vice-rectors for quality assurance that some programmes in merged institutions were established without having a full accreditation in place. This was described by HAHE staff and the EAC members as one-off and a consequence of the scale and pace of mergers. HAHE stated that this had to be done to accommodate students already in the system and that all programmes in this category will undergo appropriate evaluation. The Minister for Higher Education stated that mergers were long overdue and absolutely required to modernise the system and that a pragmatic approach had to be taken to dealing with accreditation anomalies in the situation. This view was also expressed by the General Director.

The panel looked at the pattern of stakeholder engagement in all the activity of the agency.

There is legal provision for one student member of the EAC in place from 2020. The membership term is one year and to date there have been two student participants. The review panel met these two students in a separate meeting and met one of them also in the meeting with EAC members. They had never met each other before the on-line meeting with the review panel. They confirmed that they had been selected by "lottery" as a result of a call issue to the universities. They also confirmed that they were there in an individual capacity and had not been nominated by any student representative body. The EAC also has one member nominated by a consortium of technical and economic chambers. The legal structure of the EAC allows it to form a quorum without the participation of either the student or chamber member.

In January 2020, new legislation allowed for the formation of student registers for the purpose of creating a pool of student experts. A Register of undergraduate students was created by mid-2021. This time period was explained to the panel as resulting from the need for enabling legislation and the time required to put out a call to the HEIs. By February 2022, at the time of the panel visit, no students from this register had been used on any reviews. The review panel was told during the site visit that this panel would enable the use of students on panels by March 2022.

With regard to the role of students on their internal procedures, the SAR states in the section on thematic analysis (p. 43): *“Especially with reference to students, a culture should be nurtured where the latter can interestingly contribute to the quality assurance process and to a wider extent. Students should be able to actively contribute in the QA process (e.g. the students could offer feedback to the conclusions of HAHE reports). Students should also be active (and represented) in Quality Assurance Units of Institutions, in Internal Evaluation Groups, and in offering their feedback and opinions with reference to their expectations as per the curriculum, the syllabi, etc.”*. The panel checked with HEIs on the participation of students and was told that it was patchy but that it was encouraged by HAHE. There was no student involvement in panels created by HAHE.

HAHE does not have a Stakeholder Advisory Body.

## **Analysis**

HAHE carries out the work of evaluation and accreditation in accordance with its published mission, policies, and criteria. It references its alignment with the ESG 2015. The review panel concluded that in its daily work HAHE does translate its policies and procedures into its daily activity but there is scope for the agency to stand back a little and consider the potential for systemic improvement that could be generated by a more effective analysis of its current data. The review panel is satisfied that the work done on USP and IQAS is well-aligned with its written policies and with the experience of

the HEIs. It was not possible to consider the proposed post-graduate evaluation material as it had not been published at the time of the review visit nor had it been issued to the HEIs. As these reviews are scheduled to commence in the second semester of 2022, it provides little time for meaningful responses from the HEIs. When staff were asked about the short-time available to HEIs, they responded that the procedures would essentially be the existing ones with one or two additions and that therefore they did not see any need for a pilot phase. The panel suggests that this approach is reviewed as quickly as possible in order to consider the fit between the proposed procedures and the programmes being evaluated. It would also be useful to incorporate a very early-stage review should HAHE decide to proceed with its announced schedule.

The review panel heard a lot of comment on the expanded mission of the agency and this appears to have had positive and negative impacts on its QA work. It has led to a very heavy emphasis on the collection of quantitative data which provides a much-needed evidence-base for decision making in connection with the new funding allocation scheme, but it has had the unintended consequence of taking attention away from qualitative analysis and focus on the culture of QA. It would appear that some HEIs now over-concentrate on the easily measurable metrics and are less focussed on the recommendations for enhancement.

In respect of its role for national strategic planning, the SC members believe this to be a very important component of the expanded mission of HAHE. They believe it will have a significant impact in the future. It is also evident that the HEIs hold the President of HAHE in high regard and trust his independence. This will help in developing the culture of QA at all levels of HE in Greece. However, there is a need now to address the resources required to meet its expanded mission.

Changes have occurred since 2015 which are definitely welcome, particularly in the composition of the SC. However, HAHE is still very weakly tethered to its external environment. There was little real sense of work being done to build its network of relationships with the world beyond HE. And HAHE has not done what it should have done on student engagement over the last 5 years.

### **Panel recommendations**

1. That HAHE develop mechanisms for the more explicit inclusion of stakeholders in its QA processes and activities.
2. HAHE use its data-collection processes as a tool to develop a proactive and more strategic planning-oriented approach.

### **Panel conclusion: 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 established legal status of HAHE (law 4653/2020) is recognised and accepted by the Ministry for Higher Education and the rectors of the HEIs. It was referenced in the panel meeting with other agencies operating in Greek HE, in particular in the statements from the representative of The Hellenic Federation of Research.

The legislation that transferred the role and responsibilities of HQA to HAHE is clearly referenced in the SAR and was confirmed by the Minister for Higher Education. The mission and responsibilities of HAHE was extended in its incorporation legislation to include a role and responsibility in respect of funding allocation and strategic planning in HE. HAHE is the only body legally established to carry out the functions of QA in publicly funded HEIs in Greece.

HAHE (and its predecessor agency HQA) is a member of ENQA.

### **Analysis**

The official status of the agency is legally established and this official status is accepted by all the major actors. The review panel felt that the official status of the agency was well understood and that it has established a firm profile in respect of its official relationship to other institutions.

### **Panel conclusion: 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.

### **2015 review recommendation:**

*“That the responsible Greek bodies consider whether full responsibility for consideration of follow-up reports should rest more directly with HQA as part of a more structured and transparent follow up process.”*

### **Evidence**

The organisational independence of HAHE is guaranteed by Law 4653/2020 (art. 1). HAHE is a national authority responsible for designing and implementing its own methods and procedures for internal and external quality assurance, selecting, and appointing experts, developing schedules, deciding on the content of reports, making evidence-based decisions, and setting criteria for centres of excellence. Accreditation standards are approved by the EAC.

The review panel explored the independence of the agency at its meeting with the Ministry for Higher Education. The Minister confirmed that her department allocates a budget to HAHE on foot of a budget submission but that all decisions on its actual internal allocation were made by HAHE itself. In respect of accreditation decisions, the Minister said they were submitted to her department to check legal compliance with national legislation and that was the only function the Ministry exercised in respect of decisions of the EAC and SC of HAHE.

The operational independence of HAHE was examined by the panel. With regard to the composition of the SC, positions are filled as a result of open competition. The review panel met its members and confirmed the method of appointment. It also learned from the two members of the SC who are based in the U.S. and the members based in Greece that they carried out their work without any interference and that they were afforded complete independence in expressing views. The President of the SC is appointed by decision of the Council of Ministers. The vice-president of the SC is selected by the members of the SC. The rectors of the HEIs stated that the appointment of the President was important because he functioned as a "trusted intermediary" in the relationship between the HEIs and the ministry. The international members of the SC emphasised the centralised nature of higher education in Greece,

the need for structural reform and the importance of the independence of HAHE in carrying out its functions in a volatile environment. They also expressed the hope that the independence of HAHE would contribute to more long-term thinking and planning in the system.

With respect to the independence of formal outcomes, the review panel checked the experience of foreign experts to see if they were satisfied that they operated independently in arriving at their findings. They confirmed to the review panel that HAHE emphasised the importance of the clarity and transparency of their independent roles. They confirmed their independence notwithstanding occasional misguided and unsuccessful attempts on the part of some HEIs to have their “mark” improved. Experienced foreign experts felt that this attempt to change an outcome was a relatively new development and was associated with the now established relationship between the use of consolidated report findings and decisions on funding allocations. The experts were very clear that the final outcomes of the quality assurance processes remain the responsibility of the agency.

The EAC members gave very clear descriptions of how they too operated with complete independence in making their decisions.

### **Analysis**

The organisational and operational independence of HAHE is now well established and this is a very positive feature of the Greek HE system. The independence of formal outcomes is now an established part of its processes and, crucially, this is well understood by all major stakeholders. Much of the credit for this lies with the leadership of HAHE and the crucial role it has played in building trust across the system. HAHE attends the regular meetings of the rectors of the HEIs by invitation and the rectors expressed full confidence in the impartial approach of HAHE to its work. The same level of confidence was evident in the views expressed by the Minister for Education and by the representatives of a range of organisations involved in Greek HE. This is a very impressive achievement in what has been a period of great change.

In respect of formal outcomes, the review panel established that HAHE operates with complete independence.

### **Panel commendations**

I. The review panel commends the work done by the President and members of the SC and the General Director in building a clear understanding and acceptance of the independence of HAHE in the Greek HE system.

### **Panel conclusion: 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.

### **2015 review recommendations:**

*“That HQA consider how the outputs from its review activities can be further focused to support system-wide analysis and institutional quality improvement and enhancement.”*



*“The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase its resources for this purpose. The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which HQA can undertake.”*

## **Evidence**

In the SAR, HAHE uses its work on compiling the annual report as the evidence-base for its work on thematic analysis. The review panel examined the material in the annual reports. They are published on the HAHE website and are delivered to the President of the Hellenic Parliament, the Standing Parliamentary Committee on Education, and to the Ministry of Education. A summary is presented to the MPs of the Standing Committee in a special session. They are structured around the presentation of consolidated data on the HEIs. In the SAR, HAHE states that it uses the material from the annual reports to inform its internal procedures and to assist it in making recommendations to the Ministry in respect of funding. The latter has become an important tool in funding allocation, and it is extensively referenced in the SAR.

The production of thematic analysis is allocated internally to the Centre for Studies and Research of HAHE. In its discussions with staff of this Directorate, the review panel learned that their understanding of their role is that their primary purpose is the collection, consolidation, and warehousing of quantitative data in order to prepare the annual reports. The review panel established that much of the work for the annual reports is done by those employed on short-term contracts and funded by the EU funding. The review panel met a number of these contract employees, and they described their work to the panel. They said it consisted largely of “collecting and warehousing” data for use in the annual reports. When asked about what was encompassed by the term “thematic analysis”, they stated that their understanding was that this requirement of the ESG 2015 was met through the production of the annual report. They stated that time constraints on their contracts would not allow them to engage with any more open-ended questions and said that they would prefer to have as little qualitative metrics as possible in the reports returned to them. They do extract key findings from the data, but this appears to be confined to a simple ranking of issues raised. They told the review panel that the same key finding emerged each year - insufficient funding.

The SAR mentioned a new project (under EU funding) that was gathering data on graduate tracking. The process is referred to as Transitional Observatories. The review panel learned more of this project from HAHE contact person and from the representatives of the National Statistical Authority and the Institute for Educational Policy (IEP). This project is at an early stage and its purpose is to attempt to foster greater alignment between HE provision, and labour market requirements. It has not published any analyses to-date.

The review panel did not find any other material that would fall under the designation of thematic analysis.

## **Analysis**

HAHE, in the SAR and at meetings, refers to qualitative data provided by the institutions in the NISQA information system. On inspection, the data proved to be more quantitative than qualitative (see <https://www.ethaae.gr/en/services/quality-data-2>). The review panel saw little evidence of the collection or analysis of qualitative data, and this has directly impacted on the capacity of the agency to understand what is required for thematic analysis. At the moment, the collection of system-wide data is being offered as evidence of thematic analysis and its publication is limited to the annual reports, that consist

more in a summary of activities than in a real self-critical reflection and in a thematic assessment of specific practices.

Through its activities and data gathering in its information system, HAHE collects a multitude of different data and responses from HEIs and notes their success rate in accomplishing individual KPIs. During the site visit and in the documentation, the review panel noticed an inconsistent understanding of the importance of thematic analyses, results, and outcomes which are not intended to improve QA policies and processes at the institutional and national level. Instead, the analysis is more focused on reviewing whether certain KPIs had been achieved than what impact the changes may have on improving IQA and EQA systems in Greece.

#### **Panel recommendations:**

1. HAHE should examine the work in thematic analysis carried out by other agencies in order to broaden its understanding of this topic and to provide it with benchmarks for its own performance.
2. HAHE needs to broaden its engagement with qualitative analysis and encourage all HEIs to do the same.

#### **Panel conclusion: Partially compliant**

### ESG 3.5 RESOURCES

Standard:

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

#### **2015 review recommendations:**

*“That HQA be encouraged to develop and pursue its strategy for maintaining and increasing its resources (including those for staffing, finance, hardware, and software), in order both to maintain its programme of work and also to develop its capacity for sector-wide analysis.”*

*“The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase its resources for this purpose. The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which HQA can undertake.”*

#### **Evidence**

The budget of HAHE comes from two sources: (1) state funding and (2) EU funding which is referred to as NSRF Funding.

The review panel encountered some difficulties in reconciling differences in budget figures in the SAR and those used in its separate meetings with the Head of Finance and the General Director. The review panel sought clarifications and got figures for the period 2019-2021 in a supplementary document provided by HAHE:

2019 Government funding: €709,222	NSRF Funding: €800,807
2020 Government Funding: €852,347	NSRF Funding: €483,457
2021 Government Funding: €840,468	NSRF Funding: €543,352

The NSRF Funding is drawn down on a project basis from a total fund of €4,596,103 for the period 2018-2023.

In additional information supplied by HAHE, the following pattern of budget allocations was identified:

State Budget	NSRF
Payroll Rents and fixed operating costs Equipment and consumables Travel and Subsistence	Travel, accommodation expenses for foreign experts Contracted staff (also listed as external services) Information system upgrading External evaluation and accreditation costs at HAHE Technical and Legal support Training fees and related expenses Publicity

The panel met with the Head of Finance in HAHE. He stated that the budget was split approximately 50/50 between the funding from the Greek government and the funding from the EU. The Minister stated that there had been an increase of 20% in the annual budget of HAHE the previous year and that the agency was funded based on its annual budget request to the Ministry.

Elsewhere in the SAR, the review panel read that in 2017 there were no accreditations carried out because of "Lack of HAHE funding" (p. 24). In its commentary on human resources the SAR states: *"The under-staffing of the HAHE is a problem associated with both budgetary constraints and ineffective staffing and transfer procedures due to the lack of appropriate provisions for their implementation."* (see section 9.5.2) and continued, *"The Authority considers understaffing and inadequate funding as serious impediments in the process of carrying out its mission and strategy."* (section 9.5.5). In the SWOT analysis included in the SAR which covers the period up to 2019 (thus most of the period covered by this review), the following statement appears under weaknesses, *"Serious deficiencies in staffing and funding due to governmental reliance"* (see section 13, p. 74) and under the heading Threats, *"Risk of slowing down accreditations, due to the direct dependency of accreditation funding on the NSRF."*

The staffing of HAHE falls into two main categories: those who are state employees and those who are on short-term-contracts, the latter referred to in the SAR as "external partners". The total number of state staff in 2022 at the date of the review panel on-line visit was 23 and the number of contract staff was 13.

The review panel met both categories of staff and also requested an additional briefing on staffing from the General Director. Within the category of state employees, there are those who are permanently attached to HAHE and those who rotate there as part of the civil-service wide practice of "internal mobility" and secondments. So, within the 23 "permanent" staff, 13 are on rotation with a maximum duration for secondment of three years. The Heads of the Directorates (with one exception) come from the permanent staff allocation. When asked about the impact of these practices on staff stability,

HAHE contact person estimate that the annual churn among the “Permanent” staff was of the order of ca. 30%.

All funding of contract staff comes from the NSRF. Those the panel met told that they are usually employed on three-month contracts and the General Director said there was a review of each contract after two months to check if targets are being reached. In discussions with the contract staff, it was clear that much of their work related to data collecting, warehousing, and collation. They explained to the review panel that the purpose of their work was to prepare material for the annual reports, and they also said that they found the requirements to be onerous. The short-term contract process is predicated on the delivery of agreed quantitative data.

The review panel asked the SC for its views on the current funding situation. They referred to the very constrained budgets available since 2015, the reliance on EU funding and their understanding that their funding arrangements with the EU would be renewed after 2023 until 2030.

The review panel also sought information on the staff planning and resources required to carry out the proposed accreditation of over 1600 post-graduate programmes, due to commence this year. HAHE contact person informed the review panel that she estimated that an additional 15 staff would be required, and that she anticipates recruitment "in the near future".

## **Analysis**

It took considerable effort and time before the review panel was able to reach any reasonably confident conclusions about the financial and human resources of HAHE. The section of the SAR dealing with this topic could best be described as partial. The review panel then heard very different views on finance from the Minister and those expressed in the SAR. In seeking to establish baseline figures, the panel again could not reconcile what it heard from the Head of Finance with what is in the SAR. HAHE contact person was asked to provide additional material to the review panel, and she then answered questions on the data at her final meeting with the review panel. Further clarifications were then provided before the review panel reached its conclusions.

The matter was further clouded by the split of information between that pertaining to HQA and that associated with HAHE. Again, the root of much of the confusion goes back to the inadequate presentation on this topic in the SAR and the failure to reconcile the pre and post 2020 data.

Whatever the confusion in data, the review panel eventually concluded that the agency is reliant for 50% of its expenditure on EU funding that is tied to specific projects, and it is operating on an expectation that this funding will continue to 2030. This gives rise to a worrying focus on the short-term in respect of QA. It is also driving the focus on qualitative data and mitigates against a focus on long-term enhancement. The staff employed on short term contracts have little opportunity to engage with or be exposed to staff development or the internal quality assurance of the agency. The second category of staff, those who are on permanent civil servants but on rotation into the agency, brings another layer of instability. They do receive some initial brief training but are again a temporary entity occupying more than half of the “full-time” posts. An example of the impact of this unstable work-force structure that is of particular concern is the absence of any of the additional staff required to carry out the post-graduate study programme assessments and accreditation that the panel were told would commence this year. It is difficult to see how staff recruited in this time frame can have any opportunity to engage in meaningful staff induction and briefing.

The review panel notes, too, the impact on institutional memory, long-term planning, and the development of an internal culture of self-reflection caused by this level of churn in staff numbers. This is rendered more acute by the absence of any meaningful formal de-briefing mechanisms for exiting staff.

## Panel recommendations

1. HAHE needs to establish a secure and adequate financial basis for its activities.
2. HAHE needs to secure a staffing complement that reduces its reliance on short-term contracts for its QA activities.

## 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.

## 2015 review recommendation:

*“Given the growth in HQA activity it may now be timely to formalise aspects of HQA’s internal feedback arrangements; the Council should consider this in consultation with the General Director.”*

## Evidence

The SAR prepared by HAHE for this review is described as a collaborative process involving internal and external consultation. The review panel asked those it met during the site visit about their involvement. The SC and General Director had a full knowledge of its contents and described their role in reviewing the document. It also became clear to the panel that the SAR was based on work done before HAHE came into existence in preparation for the review originally scheduled in 2020 and then updated for this review. The EAC members said they were aware of the SAR and that it was the work of the SC and General Director. Those listed in the SAR as the working group for the development of the SAR (p. 5) were met by the panel. They did not provide any detail of their engagement and no minutes of their meetings were created.

HAHE does have a quality manual that includes its policies and procedures. The Quality Manual is an official document for the IQAS process and is used as a guide to the implementation of IQAS. It consists of a series of modules called processes that are aligned to the ESG 2015. The processes describe the data required for each stage of the IQAS and the measures to be used to assess effectiveness. There is also an accreditation guide which is sent to institutions. The SAR states that the policy manual is based on the accreditation guide (see section 9.6). The SAR refers to the code of ethics in place that covers staff, foreign experts and those working on short-term contracts. Its focus is on confidentiality, discretion, and transparency.

The SAR states that, *“All HAHE activities are organised and executed in house.”* (section 9.6). The SAR also tells the panel what HAHE plans to do to develop its own institutional quality culture: *“improve internal quality assurance and internalise operational rules that promote its vision, mission, and values of quality. Such rules and procedures may refer to a) the development and implementation of the HAHE’s communication strategy, b) the establishment of operational rules for the Council (explicit roles, rights, and obligations of the members) and c) the development and implementation of an internal staff training program on quality management.”* (section 9.6).

HAHE does not have a full complement of written procedures in place. There are no written formal procedures for the SC or the EAC. At meetings with each of these groups, the review panel established that custom and practice is used as a guide.

The review panel looked for the agency charter on protected disclosures. This has not been developed. Nor is there a written procedure covering conflict of interest for its committees; here again there is an established practice, but it is not documented. There is a legal provision (law 4653/2020) that prevents Councils' members and staff of HAHE from their participation in accreditation panels.

In its description of internal quality assurance in HAHE itself, there is no evidence of an established procedure for staff to have their complaints heard and addressed. The review panel was told that all staff have annual reviews at which their output and targets are reviewed. There was no evidence of how staff might challenge any findings in this procedure.

The review panel engaged with staff on their experience of staff development and their understanding of internal quality assurance. The EAC and the general Director were also asked to comment. The review panel learned that there is little time available for such activity, a dearth of written procedures and briefing material and a focus on measuring quantitative output.

The review panel was also interested in exploring the agency's awareness of the need for independent verification of the validity of its processes. To this end, information was sought on any procedures used by HAHE to test existing and pilot new standards and procedures. This was seen as particularly important by the review panel in light of the large programme of post-graduate evaluation and assessment that is scheduled to commence this year. The panel was told that no such piloting or testing was planned and that such an additional step was not necessary as HAHE would use its existing procedures with one or two additions.

The SAR outlines the complaints and appeals procedure used by HAHE. The Appeals Procedure was discussed with the EAC. It became evident that the EAC establishes the Appeals Board for a three year term that then hears the appeal of a decision reached in the first instance by the EAC itself and that the findings of the Appeal Board are then referred back to the EAC. To date, the EAC has accepted every decision of the Appeals Board.

## **Analysis**

The process by which the SAR was prepared is a useful starting point in understanding how internal quality assurance is understood and operates in HAHE. This is a very compartmentalised organisation. For example, the staff did not understand the role they might be expected to play in preparing the SAR. There had been no agency-wide processes for self-reflection. The EAC had a similarly limited engagement in the process. And in reality, there was no attempt made to benchmark the performance of the agency against comparable agencies that operate under the auspices of ENQA.

The leadership of HAHE does a lot of very good work and its impact is very positive both inside and outside the agency. The members of the SC have an excellent understanding of strategy and policy, a high level of awareness of the QA issues both inside and outside the organisation and a strong conviction on the potential of the agency. The absence of adequate internal communications and staff development means that this necessary institutional culture has not been widely dispersed. When asked to describe their work, staff focussed on the collection and collation of reports. The process is seen as an end in itself and its ultimate purpose is somewhat lost. This helps to explain the lack of real engagement with enhancement in HAHE and the very limited understanding of what are the essential components of internal QA.

The SAR section deals with internal QA by reference to what HAHE needs to do (section 9.6). The review panel agrees with all the gaps identified here and feels they must be addressed as a matter of urgency.

The Appeals procedure described in the SAR does not meet the minimum threshold required for independence because the same body that is the subject of an appeal is making the final decision on the outcome of the appeal.

**Panel commendations:**

1. Agency must be commended for the large acceptance and recognition HAHE has gained in the eyes of all actors of higher education, and for the securing role played in that process by the presidency of the agency.

**Panel recommendations:**

1. HAHE should develop a comprehensive set of written procedures covering all of the gaps identified in this section, so that the security of the processes does not rely solely or mainly on the custom and practice of any person or entity in HAHE.

2. HAHE should develop a structured plan for its internal quality assurance that has annual reviews built into it.

3. HAHE should engage external advice to assist it in developing its internal quality assurance culture.

**Panel conclusion: Partially compliant**

## ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

**Evidence**

The first full review of HQA took place in 2015 and HQA submitted an interim update on progress to ENQA in 2017. A full ENQA review was initially scheduled for 2020 but this was deferred at the request of HAHE and with the agreement of ENQA. The grounds for the deferral were the issues created for the agency by the legislative changes that led to the creation of HAHE, incorporating the function and mission of HQA and, additionally taking on a range of new functions associated with the funding of higher education and the development of the long-term strategy for HE in Greece.

The spread of a new COVID-19 variant in early 2022 led to the decision to move the review visit on-line.

**Analysis**

The review panel is satisfied that the requirement for cyclical external reviews is met and recognises the difficulties that HAHE had to confront to complete its preparations for this review.

**Panel conclusion: 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 I of the ESG.

#### Evidence

HAHE has four sets of accreditation standards in place covering IQAS, USP, FLSP, and New Study Programmes (NSP). The criteria are published and available on the HAHE website. Details of these standards are outlined in the SAR (section 10.1).

HAHE has accredited the internal quality assurance systems (IQAS accreditation of QAU/MODIPS) of the HEIs, as is required under Greek legislation and detailed in HAHE's list of procedures. The guidelines and processes used are outlined in the SAR and their use was confirmed to the review panel by the vice-rectors who head up the quality assurance units (MODIPS) in the HEIs.

Under HAHE regulations, IQAS evaluations and accreditation must be in place before a HEI seeks programme evaluations. The review panel learned of some anomalies in the implementation of these regulations that have occurred because of the speed at which some mergers of HEIs occurred. This issue is documented in the SAR. In 2018 and 2019, 25 HEIs changed their structures as a result of mergers. The SAR (p. 7) states:

*"The 25 HEIs consist of 422 departments (147 of which are new offering new undergraduate study programmes, while 37 have been suspended under Law 4653/2020) and 430 undergraduate study programmes. By June 2020, there were 69 undergraduate study programmes leading to the award of an integrated master's degree (article 46, Law 4485/2017)."*

In respect of merged programmes, the process of evaluation and accreditation is now commencing and in the period since 2018/19, these programmes have continued to run in order to facilitate students who were already enrolled. The accreditation of these programmes on an interim basis was done by the Ministry. The SAR states that the mergers took place without any consultation with HAHE. The internal quality assurance units of the HEIs (MODIPS) are described in the SAR as consisting of the rector of the HEI or one of her/his deputies as president, five professors, one representative of each category of staff, one undergraduate student and one post-graduate or doctoral student "if available" (p. 17, section 3.10.2). Internal regulations are published on the HEIs website and their use is described as being monitored by HAHE.

The review panel met a number of the vice-rectors who head up the MODIPs and sought greater detail on the involvement of students in the work of the MODIPs. The responses indicated a varied level of engagement though it now seemed to be general practice to have one student on the MODIP itself. The majority spoke of the difficulties in getting "suitable" student representatives because of what they describe as the "flawed" legislative status of student representative bodies. The review panel was also told that it was difficult to deal with any student representative bodies and that many of those who held positions in the representative bodies were, in reality, not attending any programmes in the institutions. The response to various questions from the review panel about involving students in their work was that they do so "where possible". The vice-rector from one HEI spoke, however, of a greater degree of student engagement including on the welfare committee of one university. They also referenced the supporting material provided by the ESU. All the vice-rectors said they were encouraged by HAHE to use students in their internal processes in a "standardised" manner.



The vice-rectors were asked to describe their pattern of engagement with HAHE. They told the review panel that they were able to seek assistance as required, that they were "informed" of developments, and that there had been no testing of the new post-graduate procedures. The majority of those at the meeting expressed satisfaction with the relationship with HAHE and said that the system as a whole had benefited from the introduction of standardised procedures.

In the SAR, HAHE outlined how it provides oversight of the implementation of ESG standards for internal quality assurance (I.1-I.10) in the HEIs. The HAHE publication, *Policy for Quality Assurance* is described as the "guiding document" and "operating principles" (see section 9.7) which HAHE uses as the framework for its activities.

The SAR does not have an explicit mapping grid in respect of ESG I.1-I.10 but it does cover the activity of HAHE that addresses each standard in its published standards and guidelines for IQAS, USP, and FLSP. The table has been developed by the panel based on information provided in the SAR.

<b>Coverage of standard 2.1 by HAHE</b>
<b>I.1 Policy for quality assurance</b> Addressed in HAHE IQAS and SP Standards. The standards outline the function of quality assurance policies, their importance in strategic planning and management, the need to have their policies publicly available and the need for all internal stakeholders to be involved in quality assurance. IQAS accreditation is a pre-requisite for other accreditations.
<b>I.2 Design and approval of programmes</b> Addressed in USP. Defined, written process described. Requirements for statement of objectives, learning outcomes and intended professional qualifications (if any). Approval processes outlined.
<b>I.3 Student centred teaching learning and assessment</b> Addressed in SP/IQAS/FLSP Standards. States that institutions should "ensure" that undergraduate programmes are delivered in a way "that encourages" students to take an active role in learning and assessment. *The review panel has noted the absence of students from review panels.
<b>I.4 Student admission, progression recognition and certification</b> Addressed in USP/FLSP/NSP Standards which requires institutions to develop and apply published regulations covering admission, progression, recognition, and certification. In IQAS standards, this is covered under Principle 5 which deals with the self-assessment process of institutions. *The role of the Ministry in determining numbers admitted to programmes is noted in the report.
<b>I.5 Teaching Staff</b> Addressed in HAHE SP (Principle 5), FLSP (Principle 6) and NSP Standard (Principle 2.5). These standards cover the qualifications and competence of teaching staff. This standard is also covered under the IQAS standard, Principle 5 which refers to the self-assessment of institutions. *The review panel noted the absence of student participation in evaluation of the quality of teaching.
<b>I.6 Learning resources and student support</b> Addressed in IQAS/SP/FLSP/NSP Standards. The IQAS standard covers the availability of appropriate funding for learning and teaching activities and the adequacy of the teaching and research infrastructure.
<b>I.7 Information management</b> Addressed in IQAS/USP/FLSP/NSP Standards. IQAS (Principle 6) covers the collection, analysis and use of information at institutional level. The other standards refer to the information management systems at programme level.
<b>I.8 Public Information</b> The IQAS /USP, FLSP and NSP standards requires the publication by institutions of relevant and up-to-date information about teaching activities.
<b>I.9 On-going monitoring and periodic review of programmes</b> In place for undergraduate programmes. Due to commence in 2022 for post-graduate programmes.
<b>I.10 Cyclical external quality assurance</b> In place.

## **Analysis**

Throughout the on-line meetings, the review panel was told by many sources that QA in the HEIs was at an early stage of development but that substantial progress has been made. The vice-rectors who head up the MODIPs said that they initially found the procedures developed by HAHE and its predecessor, HQA, initially to be “long and difficult” but that ultimately, they had helped to change “the internal culture”. They also spoke of the good working relationship with HAHE staff, and the positive leadership provided by the General Director and President of HAHE.

The review panel also heard lots of comment on what the SAR, in its introduction, described as “a turbulent period [...] marked by continuous reforms and of course, the disruption of COVID-19.” (see section I). Overall, the panel felt that there was a sense of common purpose in the system and that this was fostered by the manner in which HAHE had assisted the HEIs in developing a standardised approach to QA. One HEI spoke of the assistance received from HAHE in encouraging her institution to “embrace quality mechanisms” and to promote and publicise its “innovations” in QA. This was an isolated instance of a positive description of the role of students in Greek higher education, but it did demonstrate to the panel that it was possible to have a different perception of students. There is a role for HAHE in incentivising change of this type. Some HEIs did not have a positive experience of the merger process and felt unduly pressured by the Ministry. It is encouraging that HAHE is perceived by the rectors of the HEIs as “a trusted intermediary” in these circumstances.

In discussions with the HEIs it became clear that meetings with the QA units of the HEIs do not occur on a regular and scheduled basis but take place “when the need arises”. The review panel formed the view that meetings are used by HAHE to inform rather than consult. This is the experience described by the HEIs in respect of the planned post -graduate evaluations. So, although the SAR refers to HAHE utilising the PDCA (Plan-Do-Check-Act) approach to its work, the review panel concluded that there is insufficient attention paid to the “C” and did not see real evidence of the incorporation of review findings into subsequent iterations of procedures.

The review panel was encouraged by the example provided by the University of Thrace of how HAHE and a HEI worked collaboratively to create awareness of student engagement. This was the only example the review panel heard of this type of collaboration, but it could be used as a model for further development.

### **Panel commendations:**

1. The review panel commend the work done by HAHE in building a system-wide consensus on the importance of QA.

### **Panel suggestions for further improvement:**

1. In respect of the PDCA cycle, the review panel recommends that more attention is given to the “C” and “A” elements of this approach to continuous improvement.
2. The review panel suggests that more attention is focused on the qualitative review of its activities and the subsequent incorporation of findings into amended procedures.

### **Panel conclusion: 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.

### 2015 review recommendations:

*“That the responsible Greek bodies consider whether full responsibility for consideration of follow-up reports should rest more directly with HQA as part of a more structured and transparent follow up process.”*

*“The Panel recommends that the new programme of work be carefully planned, phased and monitored, so as to ensure its timely delivery.”*

### Evidence

HAHE states in the SAR and on its website that it is explicitly charged with implementing the ESG standards and guidelines in Greece and that it has designed and defined its policies and standards based on the ESG 2015. This alignment with the ESG is also referenced in the legislation that established HAHE and was referenced by the Minister for Higher Education in her meeting with the review panel. The rectors of the HEIs all spoke of the role of HAHE in providing guidance to them in developing in their institutions an understanding of the ESG framework as it is translated into HAHE policies and procedures and then into the internal institutional quality assurance framework of their respective HEIs.

The review panel discussed the design of standards and guidelines with the staff of HAHE, the members of the SC and EAC, the General Director and the short-term contract workers employed by HAHE and the vice-rectors for QA from the HEIs. The emphasis in the work is on creating a reliable evidence base through the collection of data. The members of the SC, the rectors, and the minister all stress that the development of this reliable and transparent information represented a major development in the history of QA in Greek higher education.

Both the contract staff and permanent staff of the HAHE directorates placed great emphasis on their role in collecting quantitative information that could be used in the annual report. The SAR states that HAHE has *“managed to cut down by 80% the time needed to conduct the external review with the help of the National Information System for Quality Assurance in higher education that was developed in close cooperation with institutions.”* (p. 58; section 10.6). The review panel examined this electronic system and established that it is essentially designed to collect quantitative material.

The SAR also offers details of what HAHE plans to do by way of enhancement activity in the future (see section 10.6). Their future planes include more systematic communication with the HEIs, more analysis of their data and enhanced international engagement.

The review panel found very little evidence of engagement with stakeholders. The SAR states, *“It is worth pointing out that communications with stakeholders have a significant potential for improvement both in terms of frequency and in terms of diversity/variety.”* (p. 58 in section 10.2). There is a limited use of stakeholders on panels, but they are used on panels where the programme involves aligned professional accreditation.

The review panel also asked the General Director why the agency had decided to only include certain categories of experts in IQAS evaluations. These categories include Management, I.T. and Engineering

but exclude all Humanities and Social Sciences. HAHE contact person stated that it was the agency view that experts from those backgrounds were more suited to the work involved in IQAS evaluations and accreditations.

There was no evidence of systematic consultation with the stakeholders in or outside the system. The HAHE staff described the process of designing standards as involving drafts prepared by them or by the General Director and/or president; a review of the drafts by the EAC and then the HEIs were given the material and timelines agreed for the roll-out of evaluations.

As will be evident in all sections of this report, there is no consultation with students.

## **Analysis**

The HAHE procedures are designed to collect standardised, quantitative data. This might be a result of the broad scope of missions entrusted to the agency, especially the identification of criteria for the funding of the HEIs and the setting up of Centres of Excellence. Collecting quantitative data is of course necessary, and the agency has to be commended for its achievements in this domain, but it is not sufficient. As HAHE evolves, it will be necessary to bring a much greater focus to enhancement. This will require the development of different methodologies for the collection of qualitative data and the subsequent utilisation of the learnings from this data in the review of current procedures. The leadership of the agency is well aware of the need to focus on enhancement, but it seems that the staff still has to align to this priority.

The scale of reporting required from HAHE by the Ministry cascades down to the requirements on the HEIs. Notwithstanding the development of streamlined data-collection mechanisms, the vice-rectors of the MODIPs referenced the inability of the HEIs to pay sufficient attention to recommendations for enhancement in reports because of the pressures imposed by the volume of data-collection required.

There is a way to go on developing a wide-ranging and effective partnership with its external environment. This is very evident in the patchy and minimalist approach to engaging with external stakeholders. HAHE does not have a stakeholder advisory body, and this does not appear to have been actively considered at any point in the last five years. This is surprising as the previous external review report made specific reference to stakeholder engagement as did the ENQA Board communications.

Given the planned number of evaluations of postgraduate study programmes in the next four years, the review panel was interested to learn that the EAC is considering merging procedures. At the same time, such aggregation still does not reduce (automatically) the additional administrative burden for HEIs, which will have to prepare applications, relevant documentation, data, reports etc. Therefore, there is now an opportunity for HAHE, in cooperation with HEIs, to develop a new and more efficient methodology and criteria for evaluating postgraduate programmes, ensuring the most meaningful preparation of documentation and types of data that HAHE needs for quality assessment.

## **Panel commendations:**

1. The agency has to be commended for its achievements in data collecting.

## **Panel recommendations:**

1. The SC of HAHE should develop strategic proposals aimed at strengthening stakeholder engagement.
2. HEIs should be given a much bigger input into the development, testing and review of any proposed new procedures.
3. All existing procedures should be reviewed and amended on a planned, cyclical basis.

4. Stakeholders need a much greater level of involvement in all HAHE procedures and activities.
5. The exclusion of certain categories of reviewers from IQAS reviews should be removed.

**Panel conclusion: Partially compliant**

## ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

### Evidence

The accreditation process, (as originally designed by HQA and now incorporated into HAHE's processes) commences with the publication of a call to institutions to submit their proposals for accreditation (initially for their IQAS and then for their study programmes), as provided for by the relevant legislation. Then the following stages are described in the SAR:

1. Accreditation Proposal of an IQAS/USP/FLSP/NSP is submitted to HAHE by the Quality Assurance Unit (QAU) of the Institution;
2. Review by a panel of Independent Experts (Accreditation Panel) including a site visit to the Institution;
3. An Accreditation Report resulting from the accreditation process drafted by the panel to be submitted to HAHE;
4. Adoption of the accreditation decision by the EAC;
5. Publication on the HAHE website;
6. Consistent follow-up of the IQAS/USP/FLSP/NSP operation by the Institution's QAU.

The review panel found evidence of adherence to these procedures through stages 1-5.

The SAR, while describing what was required for stage 5 (follow-up) stated that this topic would not be covered in the SAR. In addition, the review panel could not find any follow-up reports on-line. This issue was then discussed with the General Director and the staff in HAHE. Following those meetings, the review panel sought additional written clarifications which were provided by HAHE contact person. The review panel was told that a standardised report, collecting quantitative data, was the methodology being applied to the follow-up procedure. The contract staff working on this project stated that there was no time available to do anything other than collate the quantitative data and they did not have time to analyse any qualitative material. They were asked if they saw any patterns emerging in the data and stated that the common thread was an appeal by the HEIs for additional funding. The process commenced in 2021 and the reports collected to date (about 50) are being collated in advance of submission to the EAC. This is hoped to occur in the first quarter of 2022. The General Director said that HAHE would publish the results once the EAC had completed its work.

As with a number of other issues, timelines being used by HAHE all referred to events since 2019 and there was an absence of material and evidence for the earlier years covered by this review. Following a request from the review panel, a link was provided to some earlier follow-up reports on the HQA website, but these were very limited in scope.

In discussions with the vice-rectors who head up the MODIPs, they confirmed that the stages outlined in this section were used consistently. In respect of the usefulness of the procedures, they said that they initially found them "cumbersome" but that they subsequently proved to be both useful and consistently applied. They added that the standardised use of procedures had helped their institutions to improve internal QA but added that there often wasn't time for HAHE or the HEIs to reflect and act on the recommendations in reports because of the time-constraints, the administrative burden imposed by reporting requirements and lack of resources.

In relation to the requirement for a site visit, the review panel established that this was done in a consistent manner but that it was moved on-line in response to the COVID-19 pandemic. The General Director said this had worked well and that the HEIs had collaborated very positively to make it possible. HAHE has prepared a set of guidelines to take account of the on-line procedure and differing requirements. HAHE also indicated that it was their intention to review its use in the light of experience to-date. The HEIs confirmed that the on-line visits had taken place as described and they were satisfied with the process.

Reports are prepared by the external review panels. Each panel is assigned an internal HAHE staff member who provides assistance and guidance as required. Review panels have initial orientation meetings in order to ensure a common understanding of the system, the policies and procedures. Reports are sent in the first instance to the HEI involved. The regulations specify that the HEI may comment only on matters of accuracy. Some of the foreign experts who met the review panel said that the HEIs increasingly seek to have their "mark changed". The General director agreed that this does happen occasionally but emphasised that the final decision on the report rests in the first instance with the review panel and then with the EAC.

## **Analysis**

The SAR does not have data on Follow-Up procedures and indeed states that they will not be covered in the document. This is an example of the failure to produce a SAR that covers the entire period under review as the explanation offered referred to accreditations since 2019 but not to those conducted prior to that date. The lack of continuity results in a patchy picture emerging of the activities of both HAHE and the HEIs.

The review panel learned of the procedures used on follow-up reports since 2019. Again, the emphasis is on the collecting, warehousing and collating of quantitative data. This approach encourages a systemic adoption of a minimum threshold of compliance and will not assist the development of a culture of enhancement. It will be important for its future development that HAHE allow adequate time to learn from the evaluations, the feedback from evaluators and HEIs and that it begins the process of meaningful engagement for all categories of stakeholders. Such a development is a prerequisite if HAHE is to become more effective in achieving its objectives.

With the exception of the follow-up procedures, HAHE is consistently implementing its pre-defined QA processes. The review panel would like to see a greater emphasis on enhancement and there is an absence of evidence of the use of qualitative processes throughout its procedures. On the other hand, there is now a reliable, useful, and consistent data-set available as a result of the work of HAHE and this is a major development for Greek HE.

### Panel recommendations:

I. HAHE should prepare a comprehensive qualitative analysis of its follow-up reports. It should consider the findings and conclusions from this analysis and use them to systematically inform a review of the procedure.

### Panel conclusion: 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).

### 2015 review recommendations:

*“The Panel recommends that discussions be pursued with the Ministry of Education so as to permit student representation on HQA review panels and to facilitate a review mechanism for panel decisions in line with best practice set out in the ESG.”*

*“That HQA continue to explore alternative mechanisms for ensuring a stronger student voice in its external review procedures and for the inclusion of a larger number of expert from outside the Greek speaking communities.”*

### Evidence

The review panel noted the findings on this standard in the 2015 review, the comments made by the Board of ENQA in its letter advising HQA of the outcome of the 2015 review and the comments made by the Board of ENQA in response to the follow-up report of HQA in 2017.

At the dates of the review panel on-line site visit in February 2022, no students had been included by HAHE in any of its panels.

The review panel checked the details of revised legislation and learned that the legislation which provides for student participation was enacted in January 2020. The General Director informed the panel that it took until mid-2021 to create a register of under-graduate students because of the requirements related to enactment of the legislation. As a consequence, no student had taken part in any HAHE reviews between that date and February 2022. The review panel asked why students from this register had not been used, once it was created, and the General Director stated that HAHE did not think it should be done mid-stream on a set of reviews that had commenced before the panel was created. She also stated that HAHE did not feel it could change its process in the middle of a cycle of reviews in case it gave rise to legal challenges. She stated that it was their intention to commence using students in the next cycle of reviews. The register has a one-year life. The review panel then asked about the creation of a register of post-graduate students for inclusion in the panels being established to conduct the reviews of post-graduate programmes scheduled to commence in the second semester of 2022. No register of post-graduate students had been created at the time of the review panel on-line visit.

When asked about the specific recommendations arising from the 2015 review and the strongly worded advice in the 2017 letter from the ENQA Board, the General Director stated that HAHE did not have the legal authority to implement the recommendation. In follow-up questions, she added that HAHE

did not have the "legal authority" to use students as observers on panels or to create a student advisory body. She did agree that there was nothing in the legislation either before or after 2020 that precluded the use of student observers or the creation of a student advisory group.

At its meetings with the Supreme Council, the rectors of the HEIs, the Minister for Higher education, the review panel was told that there were long-standing difficulties in engaging with students arising from what were described as the absence of a working system of student unions in the HEIs.

The members of the review panels are drawn from the HAHE registry of experts and the selection and appointment are carried out by HAHE. In each case, the proposed panel is reviewed by the EAC to check that all criteria have been met. Those selected are required to notify HAHE in writing of any connection to the HEI/SP which will be associated with the specific review. The proposed composition of a panel is communicated to the HEI involved so that it, too, can alert HAHE to any potential conflicts of interest.

HAHE has a set of criteria specified in its quality manual for the panel composition for all HAHE activities:

- All members must have had HAHE training;
- At least two members must come from abroad;
- The chair must be a foreign expert, have fluent English and have previous experience on a panel;
- At least one member must have a good knowledge and understanding of the Greek HE system;
- At least two members must speak English;
- Current members of the two HAHE councils cannot be members of review panels.

The criteria also refer to the achievement of "gender balance" "to the greatest extent possible". The panel noted the gender imbalance in the register of foreign experts. The General Director stated that HAHE had difficulty recruiting female experts and that the imbalance on the register mirrored the general pattern of gender balance in Greek HE.

The criteria also include a specification that, when the programme under review involves a regulated profession that one member of the review panel comes from the relevant professional association or chamber.

All panel chairs are selected by HAHE.

For IQAS evaluations, HAHE has specific regulations. The SAR states that "normally, the invited experts have a managerial, engineering or information technology background, and are experienced in the areas of evaluation, accreditation and quality assurance." (see section 10.4.2).

There is a written code of ethics in place for panel members which they must sign before serving on the panel.

## **Analysis**

The principles that underpin the ESG 2015 refer to the creation of a "quality culture" and within that culture, the role of students is specifically referenced. The implementation of this principle has made little real, measurable progress in HAHE since 2015. There is an undergraduate student register now, two years after the legislation was enacted but no student from the register has participated as a member of a panel. Nor has any student acted as an observer on a panel. It is not an adequate response to this situation to suggest, as was done repeatedly, that there is no real national student union system in existence in Greece. If HAHE commits to the principles underpinning the ESG 2015, it can and should have taken action over the past five years. There are examples to be found in other countries of developing a consultative framework. There was no legal bar to using students as observers and the



review panel was told that HAHE could have faced criticism or opposition for taking steps that were not explicitly allowed in law. Much could have been done if there was the conviction that this was a necessary building-block in the creation of a fully comprehensive quality assurance system and if all parties were aligned in this conviction.

Even under the legislative changes since 2019, there is little evidence of anything other than minimal change. One student member of the EAC does not represent an adequate student voice. There are no student representatives on the SC and the Minister for Education when asked about the possibility of having them said that no such request had been made to the ministry.<sup>2</sup>

The review panel sees an urgent need for the recruitment and training of postgraduate experts. This will be an opportunity for HAHE to develop novel means of communicating with the student body and of communicating its intent to engage meaningfully with students. The quality of the training and briefing of these potential evaluators requires considerable thought and development. However, it is possible to seek the assistance of agencies outside Greece such as the ESU which has a track record in developing student expertise and supporting national agencies when requested to do so.

The review panel asked about the gender imbalance on the registry of experts. The explanation offered that it was difficult to recruit female foreign experts is difficult to understand as the foreign experts are not required to speak Greek. The gender imbalance in the staffing of Greek HEIs may create some obstacles to the balancing of membership of the registry but it is a challenge that should be addressed by positive promotion of the work of HAHE.

The foreign experts were very satisfied with the quality of training and briefing they received from HAHE before the start of the pandemic. The move on-line has resulted in an understandable and truncated induction and training programme, and this should be reviewed through a specific evaluation of its effectiveness. The review panel learned that HAHE hopes to commence a look-back at its response to the pandemic in the near future and a comparison of its pre- and post-covid approaches to the training of foreign experts would be a useful element of this review.

### **Panel recommendations:**

1. HAHE needs to develop an effective training programme for student experts and should get advice and guidance from other agencies on how to do so.
2. HAHE should assume a national leadership role in developing a meaningful student representative system.
3. The gender balance issue on HAHE's register of experts and on individual panels should be vigorously addressed.

### **Panel conclusion: Non-compliant**

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<sup>2</sup> HAHE posted the following comment in its check of the factual accuracy "The majority of the Analysis in this section regarding student participation and Recommendations 1-3 stem from a major misunderstanding. The Review Panel came under the impression that student engagement is discouraged or even objected by the Government, the University Administration, HAHE, or all of the above.

The reality is that student unions, with their long history of political activism, exercise their right not to participate, as a means of protesting against evaluation, accreditation, and EHEA itself. It is their strong opposition that has prevented Greece from fully adopting the Bologna process (the 3-2-3 cycles of HE programmes).".

## 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

HAHE publishes its judgments and outcomes for all its activities and the criteria used to underpin its decisions are also published. The HAHE website is the main repository for its policies, processes, and judgments. The SAR (see section 10.5) lists the criteria for each process. The degree of compliance with each criterion for all external QA activities of HAHE is categorised under one of four possible judgments: fully/substantially/partially/non-compliant.

The review panel examined the procedures used to train and brief panels in order to ensure that there is a common understanding among all on the principles and procedures and criteria. Before COVID-19, training took place in person over two stages. The first stage involved a general briefing and training of those on the register of experts and was conducted by the President and the General Director. Throughout 2018, 2019 and early 2020, when a panel was selected for a specific review, that panel then had a second stage briefing and training session on the day before a site visit at which the specific procedure being used was again reviewed. Following the site visit, a meeting was held back at the agency headquarters in Athens. 343 experts took part in training sessions between 2018-2020.

From the outset of COVID-19 all such meetings have taken place on-line. The review panel spoke to some recent members of the register of experts, and they did not have a general training session but did have an online briefing - generally of about an hour's duration.

The foreign experts were asked about their views on the consistency of application of standards and guidelines. The panel members generally believed that the standards were applied consistently but did offer some interesting observations. One panel member felt that the linking of accreditation and evaluation to funding was having a negative impact as in some instances the HEIs were coming back to panels to argue for a "higher mark". He also stated that the enhancement dimension was getting less attention in the HEIs because the focus had shifted to the use of published outcomes as the basis for funding. Another foreign expert stated that there was an over-emphasis on the collection of data and quantitative metrics at the expense of a more holistic focus on qualitative assessment, judgement, and culture. The foreign experts also suggested that a greater emphasis on qualitative assessment should be designed into the procedures. The foreign experts had not had sight of any follow-up procedures or reports at the time of the panel visit.

The consistency of panel findings is reviewed in a two-step process. Staff of the agency work with the panel to inform and guide them and then the reports are considered by the EAC. The review panel asked EAC members to outline how this review takes place. Reports are grouped by field of study and the member of the EAC with a professional background in the field reviews that group of reports and then gives an oral report to the full EAC on the consistency of outcomes and reports any anomalies. All members of the EAC receive the full set of reports. No member of the EAC can review reports that emanate from his/her institution and EAC members do not speak in discussions on reports from their own institutions. They are not required to absent themselves from that portion of the meeting.

The review panel learned that there are no clear guidelines for including special/additional regulations for regulated professions when designing and preparing accreditation standards for postgraduate study

programmes. The panel did not receive clear assurances from the documentation and the interviews that the European Commission's directives laying down the conditions for regulated professions in the EU will be clearly taken into account when designing accreditation standards for study programmes in the fields of midwifery, medicine, dentistry, pharmacy, veterinary medicine, etc. In the field of nationally regulated professions, HAHE has developed cooperation with individual national bodies, organisations and employers' associations operating in more than 150 regulated professions in Greece, but it is unclear to what extent their requirements will be taken into account when planning accreditation standards.

## **Analysis**

Explicit criteria in respect of its external quality assurance activity are published by HAHE. They are available on the website and are, in general, applied consistently.

The review panel learned from its meetings with the members of the EAC and the SC that there is a heavy workload involved in the scrutinising of reports but those who spoke to the review panel emphasised its importance. The development of a reliable and consistent evidence base for decision-making was described to the panel as a “major achievement” by one of the international members of the SC. It is clear to the review panel that both councils are committed to enhancing the quality and consistency of reports and that they see them as underpinning the system. The review panel notes the volume of work that is likely to arise from the substantial number of post-graduate programmes that are scheduled for assessment. The EAC may wish to review how it will handle this issue.

The volume of reports considered by the EAC is very large and this has given rise to the practice of what is essentially a single reviewer from within the EAC reviewing all reports related to programmes in her/his field of study. She/he then reports on that group to the full meeting of the EAC. However, all members have all documentation, and the findings of the reviewer are discussed. It may be advisable in future to include a second reviewer where practicable.

The members of the SC also get a lot of accreditation data. At first glance this may seem unusual in light of the separate functions of each council. However, the usefulness of the SC being familiar with this data and confident of its consistency and transparency became apparent in a very full discussion with the SC. They explained that they need to be familiar with the data as it is used to frame their recommendations on funding and strategy to the ministry. It also allows them to build their own knowledge at a granular level of the system and that in turn informs the recommendations they make for changes, in for example, the number of programmes being offered in specific disciplines. They also described to the panel the problems in the Greek HE system that come from the use of crude data measures in certain areas, for example, research in the humanities. Therefore, at SC level it is important that they have oversight of consistency in this area and assist the development of credible national standards. They also explained that they are collaborating with the Greek Hellenic Research Foundation in order to resolve some of the issues in respect of robust metrics. The members of the SC from US HEIs made a number of observations on the relative novelty of data-collection in Greek HE and the importance of using consistent data to identify systemic issues and they cited the example of student engagement in QA in HEIs. The SC members also told the review panel that they were now using the reports to help them frame proposals for systemic enhancement, as in their proposal to the Ministry for the creation of joint chairs involving some of the 9000 Greek speaking professors working in HEIs in the U.S. and Europe, following Israel's successful model..

HAHE is aware that some HEIs are seeking to have their “mark” improved and is confident that the reliability of outcomes is ensured by its processes. The panel is also satisfied that the criteria are being applied consistently. However, it is apparent that the expanded mission of HAHE now influences how

HEIs respond to findings and, as a consequence, pay less attention than desirable to the report findings on enhancement and culture.

The issue of policy, procedure and criteria in respect of regulated professions needs clarification. The review panel was told that there is a requirement to translate the Bologna regulations in national legislation and only then can HAHE act. If new standards have to be developed for this area, they should be done in consultation with the relevant external stakeholders. In addition, all panel members who will be involved in reviews involving the regulated professions will need to be briefed in advance on the criteria.

**Panel commendations:**

1. The review panel commends HAHE for its development of an evidence-based approach to the formulation of the agency's strategy and the national strategy for higher education in Greece.

**Panel recommendations:**

1. Specific training and briefing material should be developed for HAHE staff and all reviewers covering the requirements for regulated professions at both national and European level.

2. HAHE should work with the HEIs to ensure and assure the primacy of enhancement in its criteria and outcomes.

**Panel conclusion: 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.

**2015 review recommendation:**

*"That HQA continue its work designed to further strengthen its arrangements for ensuring consistency of reporting."*

**Evidence**

The HAHE methodology in respect of findings and decisions is described in the SAR and the review panel heard confirmation of the stages of the process from the external experts, the members of the EAC, the rectors and vice-rectors of the HEIs and the Minister for HE.

Each report prepared by an external review panel is reviewed internally in HAHE and then sent to the HEI for a review of factual accuracy. The external review panel gets a copy of the response from the HEI and the final decision on the contents of the report is made by the external review panel. At its meetings with foreign experts who had chaired panels, there were references made to some attempts made by HEIs to stray outside the boundaries of factual accuracy, but the foreign experts assured the panel that the contents of the reports were always approved by the panel that conducted the review. The foreign experts suggested that the attempts to influence evaluations may be linked to the role they play in funding decisions. The Director General confirmed that this occurred occasionally but was not an issue because of the absolute adherence to the independent findings and decisions of the panels. It

is then reviewed by the EAC. At its meeting with EAC members, the review panel learned that the practice was to have reports linked to a particular discipline reviewed as a bundle by the EAC member with expertise in the associated discipline. S/He checked for consistency and made observations on them to a full meeting of the EAC. The EAC decisions are then communicated to the Ministry. The review panel checked the role of the ministry and established that no changes to decisions are made. The President of HAHE sends a formal letter to the Ministry stating that a given USP has been accredited for a specified period and at a specified level of compliance. The EAC decisions are aggregated in the accreditation information contained in the annual report communicated to the parliamentary committee on education and research. This committee considers the reports but does not change them. All judgments, outcomes and findings are published on the HAHE website and on the websites of the respective HEIs. All of these judgments are submitted to the Ministry in advance of publication in order to have the ministry check on “legal compliance”. The review panel confirmed that no judgments are altered in advance of publication by the ministry.

The review panel had some difficulty finding some of the published reviews on-line but were directed to them by HAHE. It also became apparent very quickly to the review panel that some published reports that pre-date the legal establishment of HAHE are to be found on different pages of the website, those of the predecessor agency, HQA.

The review panel discussed the availability and accessibility of published material with the only two students they met during the on-line visit. They were the present and former members of the EAC. They both stated that there is a general lack of knowledge among students on the availability of the reports and they both felt that more could be done at both the level of HAHE and the HEIs to provide easy access to this information. In its meeting with external stakeholders, there was again a suggestion made about the need for more easily accessible information on its published reports.

The decisions of the EAC are published in Greek in a standardised format that consists of the decision, the legal basis for the decision and a signature.

At the date of the on-line site visit, no follow-up reports had been published on the HAHE website. The review panel was informed by the staff and HAHE contact person that 50 follow-up reports were being reviewed by staff in advance of their consideration by the EAC and that they would be published once the EAC had completed its review of them.

## **Analysis**

HAHE has a consistent procedure in place which ensures that its reports for all its activities are published on its website and on the websites of the HEIs. Its decisions are also published in the government gazette.

HAHE consistently publishes all its findings, but the content of some reports could be improved in order to assist understanding. For example, the EAC decisions are published but the format (described in the evidence) does not give any insight to the reader. It would be possible to provide a narrative and commentary that could assist in enhancement of the system.

The review panel did not find it easy to locate material on the website. This was also the subject of comment from both the two student members of the EAC and from some external stakeholders. This may be a consequence of the substantial change in the system in recent years.

## **Panel commendations:**

I. The review panel commends HAHE for ensuring that its website offers enhanced accessibility to the visually impaired.

## **Panel suggestions for further improvement:**

1. The HAHE website could be reviewed with the objective of improving its utility.
2. Published decisions of the EAC could give greater detail including recommendations.

**Panel conclusion: 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

There are written procedures in place in respect of both complaints and appeals and they are published on the website.

In the SAR, HAHE states that it has a set process for dealing with complaints from external sources which starts with the submission of a written complaint, its examination by the relevant Directorate in HAHE, a response and closure (see section 10.7). In this section, there is reference to HAHE having separate procedures for “recovery, complaints and appeals”. HAHE also states in the SAR that its “complaints management process” operates to deal with complaints. The complaints procedure is also described in the SAR as consisting of an on-line form where complaints can be made by members of the public.

The Review panel discussed the complaints procedures with the vice-rectors and learned that complaints tend to be handled informally. The student representatives that the panel met had no knowledge of a complaint procedure.

The appeals procedure in respect of decisions of the EAC is based on the establishment by the EAC of an appeals committee consisting of three retired professors who were former members of the EAC. They review the appeal and make a recommendation back to the EAC. There is no step in its process that provides for external adjudication on an appeal.

The Review panel was told by the EAC that there were “very few” appeals and that at the date of the panel visit, there were 2 appeals awaiting decision.

The EAC confirmed to the panel that it does not have any written operating procedures for its activities and therefore does not have a written procedure for dealing with appeals. This was confirmed in discussion with the Director-General who stated that it was the intention of HAHE to develop written procedures for all its committees in the future.

The review panel could find no written procedures in respect of protected disclosures - from external or internal sources - and in discussions with staff could not find any awareness of what is required for protected disclosures.

### Analysis

The review panel felt that at both the level of procedure and culture there were weaknesses in the approach of HAHE to handling complaints and appeals from institutions and other external individuals or agencies. The process outlined for the resolution of complaints is weak on dealing with complex issues, recognising the difficulties of inexperienced complainants, and does not indicate a mechanism

for dispute resolution when the complainant is unhappy with HAHE's response. There is no avenue available to have an external review of a decision of the agency. There is, in respect of this standard, reliance on the collection of data – for example, in relation to the number of external complaints – as meeting the threshold for compliance. The SAR did not provide any evidence of a robust internal QA approach to external complaints. In discussions with the staff of the agency, the review panel could find no evidence that the agency itself had considered how it might enhance the transparency, independence, and reliability of its handling of complaints.

When an institution makes an appeal, there is an absence of external adjudication in the mechanism used. This exposes HAHE to the potential accusation of lack of independence in its appeal mechanism.

In attempting to elucidate the thinking of the agency on the handling of external complaints and appeals, the review panel saw a strong focus on the collection of data and scope for expansion of its thinking on the qualitative dimensions of all forms of dispute resolution.

**Panel recommendation:**

I. A full review of complaints and appeals procedures should be undertaken that addresses the transparency and independence of processes used.

**Panel conclusion: partially compliant**

# CONCLUSION

## SUMMARY OF COMMENDATIONS

2.1 The review panel commend the work done by HAHE in building a system-wide consensus on the importance of QA.

2.5 The review panel commends HAHE for its development of an evidence-based approach to the formulation of strategy.

2.6 The review panel commends HAHE for ensuring that its website offers enhanced accessibility to the visually impaired.

3.3 The review panel commends the work done by the President and members of the SC and the General Director in building a clear understanding and acceptance of the independence of HAHE in the Greek HE system.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

### Panel Recommendations

ESG	Panel's decision	Panel recommendations
2.1 Consideration of internal quality assurance	Compliant	
2.2 Designing methodologies fit for purpose	Partially compliant	2.2 The SC of HAHE should develop strategic proposals aimed at strengthening stakeholder engagement. 2.2 HEIs should be given a much bigger input into the development, testing, and review of any proposed new procedures. 2.2 All existing procedures should be reviewed and amended on a planned, cyclical basis. 2.2 Stakeholders need a much greater level of involvement in all HAHE procedures and activities. 2.2 The exclusion of certain subject-specific backgrounds of reviewers from IQAS reviews should be removed.
2.3 Implementing processes	Compliant	2.3 HAHE should prepare a comprehensive qualitative analysis of its follow-up reports. It should consider the findings and conclusions from this analysis and use them to systematically inform a review of the procedure.
2.4 Peer-review experts	Not compliant	2.4 HAHE needs to develop an effective training programme for student experts and should get advice and guidance from other agencies on how to do so. 2.4 HAHE should assume a national leadership role in developing a meaningful student representative system. 2.4 The gender balance issue on HAHE's register of experts and on individual panels should be vigorously addressed.
2.5 Criteria for outcomes	Compliant	2.5 Specific training and briefing material should be developed for HAHE staff and all reviewers covering the requirements for regulated professions at both national and European level. 2.5 HAHE should work with the HEIs to ensure and assure the primacy of enhancement in its criteria and outcomes.
2.6 Reporting	Compliant	



2.7 Complaints and appeals	Partially compliant	2.7 A full review of complaints and appeals procedures should be undertaken that addresses the transparency and independence of processes used.
3.1 Activities, policy, and processes for quality assurance	Compliant	3.1 That HAHE use its data-collection processes as a tool to develop a pro-active and more strategic planning-oriented approach. 3.1 That HAHE develop mechanisms for the more explicit inclusion of stakeholders in its QA processes and activities.
3.2 Official status	Compliant	
3.3 Independence	Compliant	
3.4 Thematic analysis	Partially compliant	3.4 HAHE should examine the work in thematic analysis carried out by other agencies in order to broaden its understanding of this topic and to provide it with benchmarks for its own performance. 3.4 HAHE needs to broaden its engagement with qualitative analysis and encourage all HEIs to do the same.
3.5 Resources	Partially compliant	3.5 HAHE needs to establish a secure and adequate financial basis for its activities. 3.5 HAHE needs to secure a staffing complement that reduces its reliance on short-term contracts for its QA activities.
3.6 Internal quality assurance and professional conduct	Partially compliant	3.6 HAHE should develop a comprehensive set of written procedures covering all of the gaps identified in this section, so that the security of the processes does not rely solely or mainly on the custom and practice of any person or entity in HAHE. 3.6 HAHE should develop a structured plan for its internal quality assurance that has annual reviews built into it. 3.6 HAHE should engage external advice to assist it in developing its internal quality assurance culture.
3.7 Cyclical external review of agencies	Compliant	

HAHE is non-compliant for ESG 2.4, at the date of the site visit, and due to law limitations that were impacting the composition of panels up to now, slow reactions from HAHE and a lack of initiatives in order to counterbalance the legal limitations. The review panel has been informed that the legal frame has been changed and that HAHE has taken measures in order to implement the new frame so that students will be appointed as panel members in the next months. Based on this, the review panel decided to opt for a partial compliance instead of a non-compliance in its final overall judgement of all of the agency.

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

### **SUGGESTIONS FOR FURTHER IMPROVEMENT**

2.1 In respect of the PDCA cycle, the review panel recommends that more attention is given to the “C” and “A” elements of this approach to continuous improvement.

2.1 The review panel suggests that more attention is focused on the qualitative review of its activities and the subsequent incorporation of findings into amended procedures.

2.6 The HAHE website could be reviewed with the objective of improving its utility.

2.6 Published decisions of the EAC could contain more detail.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

### Site visit schedule for the external review of the Hellenic Authority for Higher Education (HAHE), Greece 1-3 February 2022

#### 1 February 2022 – Day 1

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
1	9.15-9.45 (Athens time) 8.15-8.45 (Brussels time) 7.15-7.45 (Dublin time)	Review panel's private meeting	
	5 min	Connection set-up	
2	09.50-10.40 (Athens time) 08.50-9.40 (Brussels time) 07.50-8.40 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel) Strategy Governance Autonomy Legislative Change Resourcing Last Agency review SWOT 2019	Director General of Authority and President, Supreme Council: <ul style="list-style-type: none"> <li>HAHE President</li> <li>HAHE Supreme Council: <ul style="list-style-type: none"> <li>Vice-President</li> <li>Member</li> </ul> </li> <li>HAHE Director General</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	

3	11.00 -11.50 (Athens time) 10.00 -10.50 (Brussels time) 9.00 -9.50 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)  Legal status Legislative changes Independence Governance Funding Role of HAHE in determining funding allocation Strategic Planning in HE HE Landscape in Greece Greek approach to ESG Student Numbers and QA Lifelong Learning and Open University	General Secretary for Higher Education, Ministry for Education and Religious Affairs Representative from Ministry of Finance and Development: <ul style="list-style-type: none"> <li>Minister of Education and Religious Affairs</li> <li>Deputy Minister for Higher Education</li> <li>General Secretary for Higher Education</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	
4	12.10-13.00 (Athens time) 11.10-12.00 (Brussels time) 10.10-11.00 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)  Scope and scale of activity with reference to ESG requirements Composition Internal QA Communication Complaints and Appeals Peer Review Process Agency Self-Evaluation	Evaluation and Accreditation Council (excluding president)  HAHE Evaluation and Accreditation Council: <ul style="list-style-type: none"> <li>Vice-President</li> <li>Member</li> <li>Member</li> <li>Member</li> <li>Member</li> <li>Member</li> <li>Student Member</li> <li>Member, Common Representative of Technical Chamber, Geotechnical Chamber &amp; Economic Chamber of Greece</li> </ul>
	13.00 -13.20 (Athens time) 12.00 -12.20 (Brussels time)	Review Panel Discussion	

	11.00 -11.20 (Dublin time)		
	13.20 -13.55 (Athens time) 12.20 -12.55 (Brussels time) 11.20 -11.55 (Dublin time)	Lunch	
	5 min	Connection set-up	
5	14.00-14.50 (Athens time) 13.00-13.50 (Brussels time) 12.00-12.50 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)  Funding Mechanisms and Role of HAHE Internal Quality Assurance Work of Agency Review process ESG review Student Engagement in QA Stakeholder Relationships	Staff engaged in internal quality assurance, finance and budgeting, staff development, international activity, research HAHE staff: <ul style="list-style-type: none"> <li>• Director for Administrative and Financial Support</li> <li>• Head of Secretarial Support &amp; Communication Department</li> <li>• Head of Accreditation Support Department</li> <li>• Funding Monitoring and Allocation Department</li> <li>• Nps, in charge of Centre for Studies and Research</li> <li>• Director for Information Systems &amp; Documentation</li> </ul>
	10min	Review panel's private discussion	
	5 min	Connection set-up	
6	15.05-15.55 (Athens time) 14.05-14.55 (Brussels time) 13.05-13.55 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)  Selection and Training of experts Experience of reviews Internal Q.A Benchmarking Follow-Up	International experts who have acted on review panels in last 3 years (6-8) (gender balanced): <ul style="list-style-type: none"> <li>• Université Catholique de Louvain, Belgium (scien. field: Biology / Chemical Engineering)</li> <li>• Leuphana Universität Lüneburg, Germany (scien. field: Engineering and Physics)</li> <li>• Universidad de Murcia, Spain (scien. field: Literature and linguistics)</li> <li>• Stony Brook University, USA (scien. field: Pharmacology)</li> <li>• Örebro University, Sweden (scien. field: Medicine)</li> <li>• University of Ghent, Belgium (scien. field: Environment / Fisheries)</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	

7	16.15-17.15 (Athens time) 15.15-16.15 (Brussels time) 14.15-15.15 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel) Quality Assurance Experience as panel members Experience of HE Feedback Mechanisms	Students-Students must have been panel members. Students who are on HAHE committees should be included in meetings with the relevant committee Student 1 Student 2
	17.15-17.45 (Athens time) 16.15-16.45 (Brussels time) 15.15-15.45 (Dublin time)	Panel Review and Preparation for Day 2	
8	17.45-18.15 (Athens time) 16.45-17.15 (Brussels time) 15.45-16.15 (Dublin time)	Meeting with Agency Resource Person if Required	/

## 2 February 2022 – Day 2

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
9	09.15-09.25 (Athens time) 08.15-08.25 (Brussels time) 07.15-07.25 (Dublin time)	Review panel private meeting	
	5 min	Connection set-up	
10	09.30-10.20 (Athens time) 08.30-9.20	(Indicative Areas for Discussion- May be varied and amended at discretion of panel) Assessment procedures	HAHE Director for Quality Assurance and Accreditation, Director, Centre for Studies and Research 2 other staff from each of these directorates:

	(Brussels time) 07.30-8.20 (Dublin time)	ESG implementation Span and scale of activity Composition, management, development of experts' pool International activity Benchmarking Student Engagement Gender balance Thematic Reviews	<ul style="list-style-type: none"> <li>• Director for Quality Assurance and Accreditation</li> <li>• Head of Accreditation Support Department</li> <li>• Accreditation Support Department</li> <li>• Nps, in charge of Centre for Studies and Research</li> <li>• Nps</li> <li>• Nps</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	
11	10.40-11.30 (Athens time) 9.40-10.30 (Brussels time) 8.40-9.30 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel) Assessment procedures ESG implementation Span and scale of activity Management and development of experts' pool International activity Benchmarking Structure of HE in Greece QA and Role of HAHE Regional Requirements Post-Graduate Studies and QA International QA activity	Representatives from EOPPEP, ASAAE, IEP, and National Hellenic Research Foundation (max 5-8 in total): <ul style="list-style-type: none"> <li>• Managing Director National Organisation for the Certification of Qualifications &amp; Vocational Guidance (EOPPEP)</li> <li>• President of Institute of Educational Policy (IEP)</li> <li>• President of the Scientific Council of the Hellenic Foundation for Research and Innovation (HFRI- ELIDEK)</li> <li>• President of Authority for Quality Assurance in Primary and Secondary Education (ADIPDE)</li> <li>• Executive Councillor for Innovation and Entrepreneurship, Member of the Regional Council of Central Macedonia</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	
12	11.50-12.40 (Athens time) 10.50-11.40	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)	5 QA Officers of HEi's (MODIP): <ul style="list-style-type: none"> <li>• Vice-Rector of Academic, Administrative and Students Affairs &amp; MODIP President of University of Piraeus</li> </ul>

	(Brussels time) 9.50-10.40 (Dublin time)	Operation of internal QA in HEIs HAHE relationship Student Engagement Alignment with requirements of ESG	<ul style="list-style-type: none"> <li>• Vice-Rector of Academic Affairs and Student Welfare &amp; MODIP President of University of the Aegean</li> <li>• Vice-Rector for Academic and International Affairs &amp; MODIP President of University of Patras</li> <li>• Vice-Rector of Academic Affairs and Student Care &amp; MODIP President of Democritus University of Thrace</li> <li>• Vice-Rector of Academic Affairs &amp; Personnel &amp; MODIP President of Athens University of Economics and Business</li> </ul>
	12.40-13.00 (Athens time) 11.40-12.00 (Brussels time) 10.40-11.00 (Dublin time)	Panel Discussion	
	13.00-13.25 (Athens time) 12.00-12.25 (Brussels time) 11.00-11.25 (Dublin time)	Lunch	
	5 min	Connection set-up	
13	13.30-14.20 (Athens time) 12.30-13.20 (Brussels time) 11.30-12.20 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel)  Governance Composition External Relationships Strategy Resources	Supreme Council excluding President: <ul style="list-style-type: none"> <li>• Vice-President</li> <li>• Member</li> <li>• Member</li> <li>• Member</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	

14	14.40-15.30 (Athens time) 13.40-14.30 (Brussels time) 12.40-13.30 (Dublin time)	(Indicative Areas for Discussion- May be varied and amended at discretion of panel) Overview of QA in Greek HE HAHE and Universities Labour market Alignment Student engagement in QA Funding Mechanisms and Role of HAHE Internal Quality Assurance Work of Agency Review process ESG review	Rectors' Synod: <ul style="list-style-type: none"> <li>• Rector of University of Ioannina, current President of Rectors' Synod</li> <li>• Rector of National &amp; Kapodistrian University of Athens</li> <li>• Rector of University of the Aegean</li> <li>• Rector of Harokopio University</li> <li>• Rector of Aristotle University of Thessaloniki</li> <li>• Rector of University of Peloponnese</li> </ul>
	15 min	Review panel's private discussion	
	5 min	Connection set-up	
15	15.50-16.40 (Athens time) 14.50-15.40 (Brussels time) 13.50-14.40 (Dublin time)	Relationship of HAHE with External Stakeholders	Meeting with stakeholders, such as employers, Technical Chamber, Economic Chamber, national Media, workforce planning agencies. Other providers of technical /higher education. Open University National Students' Union Greece: <ul style="list-style-type: none"> <li>• Member of the Directing Board of the Athens Chamber of Commerce and Industry (ACCI- EVEA), President at Hellenic Development Bank of Investments S.A.</li> <li>• Director of Active Policies and International Networks of the National Institute of Labour and Human Resources (NILHR-EIEAD)</li> <li>• President of Geotechnical Chamber of Greece</li> <li>• President of Technical Chamber of Greece</li> <li>• President of Panhellenic Medical Association</li> <li>• Journalist, education editor at "Kathimerini" Newspaper</li> <li>• Representative member of Economic Chamber of Greece</li> <li>• Representative member of Technical Chamber of Greece</li> <li>• Senior Advisor for Employment and Labor Market of Hellenic Federation of Enterprises</li> </ul>
			Panel Review
16	17.00-18.00 (Athens time)	Wrap-up meeting among panel members: preparation for day III and provisional conclusions	



	16.00-17.00 (Brussels time) 15.00-16.00 (Dublin time)		
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### 3 February 2022 – Day 3

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	15 min	Connection set-up	
17	10.00-10.30 (Athens time) 9.00-9.30 (Brussels time) 8.00-8.30 (Dublin time)	Final Clarifications	Meeting with Director General
	5 min	Connection set-up	
18	10.35-11.45 (Athens time) 9.35-10.45 (Brussels time) 8.35-9.45 (Dublin time)	Private meeting among panel members to agree on the main findings	Panel Meeting
	break		
	5 minutes	Connection set-up	
19	12.30-13.00 (Athens time) 11.30-12.00 (Brussels time) 10.30-11.00 (Dublin time)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	Director General. President and other staff at discretion of HAHE <ul style="list-style-type: none"> <li>• HAHE President</li> <li>• HAHE Director General</li> <li>• Vice-President of HAHE Supreme Council</li> <li>• Member of HAHE Supreme Council</li> </ul>

## Pre-visit activities, 21 January 2022

### Online meeting with the agency resource person

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
1	15.30-15.55 (Athens time) 14.30-14.55 (Brussels time) 13.30-13.55 (Dublin time)	Review panel preparation meeting	
	5 mins		
2	16.00-17.30 (Athens time) 15.00-16.30 (Brussels time) 14.00-15.30 (Dublin time)	An on-line clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities.	Agency Contact Person
		Break	
3	17.30-18.00 (Athens time) 16.30-17.00 (Brussels time) 15.30-16.00 (Dublin time)	Panel Review and Preparation	

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Hellenic Authority for Higher Education (HAHE) by ENQA

### Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN HAHE, ENQA AND EQAR

26 August 2021

Revised 14 October 2021

#### I. Background and context

HAHE is an independent administrative authority, and its mission is to ensure high quality in Higher Education. It was established by Law 4653/2020 and is the continuation of the Hellenic Quality Assurance and Accreditation Agency (HQA), which was established in 2006. The Authority has administrative autonomy and is supervised by the Minister of Education, who exercises oversight control of legality. HAHE, in the context of its mission: a) contributes to the formation and implementation of the national strategy for Higher Education and the distribution of financing for HEIs and b) evaluates and accredits the operational quality of HEIs. To fulfill its mission, HAHE maintains an integrated information system for the management of Higher Education data and cooperates with international networks and agencies that are active in any domain related to its mission. HAHE is a member of ENQA.

HAHE periodically accredits the internal quality assurance systems of the Greek HEIs, based on a set of standards, in line with the ESG 2015. The process includes submission of the accreditation proposal, physical or virtual site visit by a Panel of external experts selected from the HAHE Register, drafting of an accreditation Report by the Panel, adoption and publishing of the accreditation decision made by the HAHE Council and submission of a follow-up report. The duration of the accreditation is max 4 years.

HAHE periodically accredits the study programmes of the Greek HEIs, based on a set of standards, in line with the ESG 2015. The process includes submission of the accreditation proposal, physical or virtual site visit (optional for levels 7 & 8) by a Panel of external experts selected from the HAHE Register, drafting of an accreditation Report by the Panel, adoption and publishing of the accreditation decision made by the HAHE Council, submission of a follow-up report. The duration of the accreditation is max 4 years.

HAHE has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2015 (as HQA) and is applying for ENQA renewal of membership.

HAHE is applying for inclusion on EQAR.

#### 2. Purpose and scope of the review

This review will evaluate the extent to which HAHE (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

## 2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

Accreditation of the internal quality assurance systems of the Greek HEIs

Academic accreditation of the study programmes (levels 6, 7 & 8)<sup>3</sup> of the Greek HEIs

The thematic analyses performed by the agency should be seen in the light of standard 3.4, rather than a stand-alone activity, unless the panel finds further evidence that proves otherwise.

## 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 review procedure consists of the following steps:

Formulation of, and agreement on the Terms of Reference for the review between HAHE, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website<sup>4</sup>);

Nomination and appointment of the review panel by ENQA;

Notification of EQAR about the appointed panel;

Self-assessment by the agency, including the preparation and publication of a self-assessment report;

A site visit of the agency by the review panel;

Preparation and completion of the final review report by the review panel;

Scrutiny of the final review report by ENQA's Agency Review Committee;

Publication of the final review report;

A decision from the EQAR Register Committee on the agency's registration on EQAR;

A decision from the ENQA Board on ENQA membership;

Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

### 3.1 Nomination and appointment of the review panel

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 potentially a labour market representative (if requested). One of the members serves 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

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<sup>3</sup> This activity only covers undergraduate programmes (status in October 2021). Following this, the agency's guidelines on the activity relate solely to undergraduate programmes (see [here](#)). Nevertheless, the review should, if existent or in development, cover (to the extent possible) the evaluation of study programmes at levels 7 and 8.

<sup>4</sup> The agency is encouraged to publish the ToR on its website as well.

(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. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

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

ENQA will provide the agency with the proposed panel composition and the *curricula vitarum* of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

### **3.2 Self-assessment by the agency, including the preparation of a self-assessment report**

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to 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 expected to contain:

a brief description of the HE and QA system;

the history, profile, and activities of the agency;

a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;

opinions of stakeholders;

the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);

reference to the recommendations provided in the previous review and actions taken to meet those recommendations;

a SWOT analysis;

reflections on the agency's key challenges and areas for future development.

All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.

The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening 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 rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If 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 ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

### **3.3 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks 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 must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

The specific national/legal context in which the agency operates;

The specific quality assurance system to which the agency belongs;

The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

### **3.4 Preparation and completion of the final review report**

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind EQAR's *Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*<sup>5</sup> to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

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<sup>5</sup> Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

### **3.5. Publication of the report and a follow-up process**

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

### **4. Use of the report**

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

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency

expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

## 5. Indicative schedule of the review

Agreement on Terms of Reference	August 2021
Appointment of review panel members	September 2021
Self-assessment completed	September (20/09/2021)
Screening of SAR by ENQA Review Coordinator	October 2021
Preparation of the site visit schedule and indicative timetable	November 2021
Briefing of review panel members	December 2021
Review panel site visit	January 2022
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	February/March 2022
Draft of review report to be sent for a factual check to the agency	March 2022
Agency statement on the draft report to the review panel (if necessary)	April 2022
Submission of the final report to ENQA	April 2022
Validation of the review report by the Agency Review Committee	May 2022
Publication of report	June 2022
EQAR Register Committee meeting and initial consideration	Autumn 2022
Decision on ENQA membership by the ENQA Board	December 2022



## ANNEX 3: GLOSSARY

ASAEE	Academic Councils of Higher Education and Research
ASPETE	School of Pedagogical and Technological Education
CYQAA	Cyprus Agency for Quality Assurance and Accreditation
EAC	Evaluation and Accreditation Council
ECTS	European Credit Transfer and Accumulation System
EEC	External Evaluation Committee
EER	External Evaluation Report
EHEA	European Higher Education Area
ELSTAT	Hellenic Statistical Authority
ENQA	European Association for Quality Assurance in Higher Education
EOPPEP	National Organisation for the Certification of Qualifications & Vocational Guidance
EPAL	Vocational Upper Secondary School
EQAR	European Quality Assurance Register
EQF	European Qualifications Framework
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area 2015
EUA	European University Association
ESU	European Students Union
FLSP	Foreign Language Study Programme
HAHE	Hellenic Authority for Higher Education
HE	higher education
HEI	Higher Education Institution
HOU	Hellenic Open University
HQA	Hellenic Quality Assurance and Accreditation Agency
HQF	Hellenic Qualification Framework
IEP	Institute for Educational Policy
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IQAS	Internal Quality Assurance Unit
ISO	International Organisation for Standardization KPI Key Performance Indicators
NISQA	National Information System for Quality Assurance in Higher Education
NSP	New Study Programme

NSRF National Strategic Reference Framework

OECD Organisation for Economic Cooperation and Development

POSDEP Hellenic Federation of University Teachers' Association

QA Quality Assurance

QAU (MODIP) Quality Assurance Unit

SC Supreme Council

SP Study Programme

SAR Self-Assessment Report

SWOT Strengths, Weaknesses, Opportunities, Threats

TEI Technological Educational Institution

USP Undergraduate Study Programme

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY HAHE

<https://docs.ethaae.gr/s/ynWA7EiPeLHfHrG>

<https://www.ethaae.gr/en/quality-assurance/iqas-accreditation>

<https://www.ethaae.gr/en/quality-assurance/undergraduate-programme-accreditation-reports>

[https://docs.google.com/presentation/d/16DbzF2aqcJxMAwPSak\\_zQJghrMGb38by/edit?usp=sharing&ouid=111973021250136741544&rtpof=true&sd=true](https://docs.google.com/presentation/d/16DbzF2aqcJxMAwPSak_zQJghrMGb38by/edit?usp=sharing&ouid=111973021250136741544&rtpof=true&sd=true)

Hahe Rules of Operation (in Greek)

Link to Follow-Up reports

Translations to English of certain legislation

HAHE work-plan for 2022

HAHE Organisational Structure (with names)

Analysis of student numbers for 2015-2020

Details of National graduate Tracking System (Transitional Observatories)

The HAHE Legal Framework and the Context of Quality Assurance, HAHE contact person (Powerpoint Presentation)

Law 4485/2017: Organisation and operation of Higher Education, provisions for research and others

Laws 4521/2018, 4559/2018, 4589/2019, 4610/2019: University – TEI mergers

Law 4653/2020: Concerning the Hellenic Authority for Higher Education (HAHE)

Law 4692/2020: Concerning Foreign Language Study Programmes

Law 4777/2021: Concerning the Minimum Admission Grade, safety and security in universities

Accreditation Documents

Accreditation Reports and Decisions

HAHE Annual Reports

HAHE Accreditation Reports

Other Additional Documents

HAHE 2022 SAR

HAHE 2022 Planning Schedule

HAHE analysis of Student Progression

HAHE Ethics and Integrity rules

## OTHER SOURCES USED BY THE REVIEW PANEL

[https://www.eacea.ec.europa.eu/index\\_en](https://www.eacea.ec.europa.eu/index_en)

<http://iep.edu.gr/en>

## ENQA AGENCY REVIEW 2022

THIS REPORT presents findings of the ENQA Agency Review of the Hellenic Authority for Higher Education (HAHE), undertaken in 2022.

**enqa.**

European Association for  
Quality Assurance in Higher Education