

**Approval of the Application  
by Quality Assurance Agency for the University System of  
Castilla y León (ACSUCYL)  
for Renewal of Inclusion on the Register**

**Register Committee**  
22/06/2020

**Ref.** RC27/A83  
**Ver.** 1.0  
**Date** 2020-06-25  
**Page** 1 / 6

<b>Application of:</b>	20/12/2018
<b>Agency registered since:</b>	18/11/2010
<b>External review report of:</b>	28/11/2019
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Padraig Walsh (chair), Pieter-Jan van de Velde, Maria del Mar Campins Eritja (academic), Inguna Blese (student)
<b>Decision of:</b>	22/06/2020
<b>Registration until:</b>	30/11/2024
<b>Absented themselves from decision-making:</b>	Not applicable
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 21/01/2019</a></li> <li>2. <a href="#">External Review Report, 28/11/2019</a></li> <li>3. <a href="#">Applicant's statement on the report, 21/01/2020</a></li> <li>4. <a href="#">Request to the Review Panel, 31/01/2020</a></li> <li>5. <a href="#">Clarification by the Review Panel, 06/02/2020</a></li> <li>6. <a href="#">Request to ACSUCYL, 06/04/2020</a></li> <li>7. <a href="#">Clarification by ACSUCYL, 06/05/2020</a></li> </ol>

1. The application of 20/12/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 21/01/2019 having considered clarification received from ACSUCYL on 09/01/2019.
3. The Register Committee considered the external review report of 28/11/2019 on the compliance of ACSUCYL with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version) and ACSUCYL's statement on the External Review Report of 21/01/2020.

4. The Register Committee sought and received clarification from the chair of the review panel (letter of 06/02/2020).

5. The Register Committee further requested and received clarification from ACSUCYL on the nature of two external QA activities (letter of 06/05/2020).

Register Committee

22/06/2020

Ref. RC27/A83

Ver. 1.0

Date 2020-06-25

Page 2 / 6

### Analysis:

6. In considering ACSUCYL's compliance with the ESG, the Register Committee took into account:

- *Verification of official degrees (ex-ante accreditation)/modification*
- *Follow-up of official degrees*
- *Renewal of accreditation of official degrees (ex-post accreditation)*
- *Institutional accreditation (ELENCHOS)*
- *Certification of the implementation of the internal quality assurance system*
- *Teaching performance assessment programme (DOCENTIA Programmes)*
- *Evaluation to create, recognize, modify or withdraw university centres.*

7. The Register Committee further noted that ACSUCYL also carries out *assessment of higher arts degrees* and *reviews of centres offering higher arts courses* which derive from regulations that may be referenced to the ESG (SER p. 20). As such activities generally fall within the scope of the ESG (as within the other regions in Spain), the Register Committee asked the panel to clarify whether they have addressed such activities against the ESG. In its response letter, the panel clarified that it did not consider these activities as they were not included in the Terms of Reference for the review.

8. These activities were not declared by the agency in its application of 20/12/2018. Consequently, they were not addressed in EQAR's eligibility confirmation, were not mentioned in the Terms of Reference for the review and, thus, not addressed by the review panel. As the Register Committee was unable to analyse the compliance of these activities with the ESG, the Committee has postponed its decision on the application pending further clarification from the agency (06/04/2020).

9. In its response (letter of 06/05/2020) ACSUCYL confirmed that it considered the two mentioned assessments as activities within the scope of the ESG.

10. The agency clarified that Spain had different legislation governing the organisation of higher arts courses and their assessment, but that their review processes were identical to the accreditation of official degrees, which was covered in the review against the ESG by the panel.

11. ACSUCYL added that it has so far carried out *assessment of higher arts courses* at master level (for official recognition and modification of the degree). The reviews were jointly carried out by the Degree Assessment

Committee (made up of scholars, professionals and students) and experts from the field of higher arts courses. The Register Committee could verify that the assessment reports were published on the ACSUCYL website.

12. The Register Committee noted that the agency is in the process of developing a protocol for the assessment of the *internal QA systems for higher arts course centres (IQAS)*, based on its ELENCHOS programme which certifies the implementation of quality assurance within university centres.

**13. The Register Committee welcomed the explanations by the agency and added that ACSUCYL is expected to submit a Substantive Change Report once the IQAS protocol for higher arts course centres has been finalised.**

14. The following activities are not within the scope of the ESG and, thus, not pertinent to ACSUCYL's registration:

- *Evaluation of Teaching Staff*
- *Evaluation of emeritus professors*
- *Research projects*
- *Research staff evaluation*
- *Ex-ante and periodic evaluations of University research institutes (\*)*

15. The Register Committee took note of the explanation of the panel that the evaluation of university research institutes (\*) is an evaluation of research quality, project proposals and recognition of research institutes. As these evaluations do not concern teaching and learning in higher education the Register Committee concurred with the panel's conclusion that these evaluations are not within the scope of the ESG, even though these activities were included as such in the Terms of Reference and Eligibility Confirmation.

16. The Register Committee found that the review report provides sufficient evidence and analysis on ACSUCYL's level of compliance with the ESG.

17. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

### **ESG 2.3 – Implementing processes**

18. In its previous decision of inclusion (05/06/2015) the Register Committee flagged for attention whether follow-up procedures were introduced for degree assessments between the first ex-post accreditation and consecutive periodic re-accreditations.

19. The external review panel explained that ACSUCYL has since its last review introduced a new system of annual follow-up procedures. The panel also confirmed that it was convinced that the follow-up procedures are well and consistently implemented.

**20. The Register Committee thus concluded that the flag has been addressed and concurred with the panel's conclusion of compliance.**

**Register Committee**

22/06/2020

**Ref.** RC27/A83

**Ver.** 1.0

**Date** 2020-06-25

**Page** 3 / 6

## ESG 2.4 – Peer-review experts

21. The review panel noted that “when the nature of the assessment in question so requires, every effort is made to include non-academic experts [...] as well as students who are experienced in quality assessment in higher education” (ERR, p. 39).

22. As the Register Committee found the analysis unclear as to whether students are consistently involved in all ACSUCYL’s review panels, the Committee asked the panel for further clarifications. The panel explained that all evaluation procedures within the scope of the ESG include one student member. The panel further added that students are regarded as equal members of peer review expert panels.

**23. Having considered the clarifications the Register Committee concurred with the panel’s conclusion that ACSUCYL complies with ESG 2.4.**

**Register Committee**  
22/06/2020

**Ref.** RC27/A83  
**Ver.** 1.0  
**Date** 2020-06-25  
**Page** 4 / 6

## ESG 2.6 – Reporting

24. While ACSUCYL publishes the results of its external evaluations, the Register Committee was unclear on whether the agency also makes public the assessment reports with a negative result. The Register Committee therefore sought further clarification from the panel.

25. In its clarification response, the panel stated that according to ACSUCYL’s handbook, the assessment reports are published once the University Council, the body responsible for taking the formal decision concerning verification and modification of curricula takes its decision. The panel added that it does not have any indication to show that negative reports of this activity are not published (in case a decision is taken).

**26. Having considered the clarifications the Register Committee concurred with the panel’s conclusion that ACSUCYL complies with ESG 2.6.**

## ESG 2.7 – Complaints and appeals

27. In its previous decision for renewal, the Register Committee flagged for attention the appeals system, as the panel recommended that ACSUCYL should revise its appeals system so that a separate committee handles appeals.

28. The external review panel confirmed in its external evaluation report that ACSUCYL established an independent body, the Guarantees Commission, that is responsible for examining appeals or complaints in areas where the agency is competent.

29. For procedures where the final decision belongs to the University Council or Regional Ministry (i.e. verification/modification, accreditation renewal, evaluation to create, recognize, modify or withdraw university centres), the appeal is considered by the corresponding decision making body.

30. ACSUCYL provides input into the consideration of these cases, but it does not decide. Within ACSUCYL, the request will be sent to the Guarantees

Commission, which consults the relevant Assessment Commission, before preparing an answer. If the appeal is granted, ACSUCYL will be requested to review its earlier conclusion.

31. The Register Committee underlined that ACSUCYL's complaints policy should communicate better that higher education institutions have the possibility to raise matters about the conduct of the process or those carrying it out (i.e. complaints in the understanding of the ESG), even in such procedures where the final decision is taken by other bodies.

**32. The Committee concluded that the agency has taken steps to address its flag and concurred with the panel that ACSUCYL complies with the standard (ESG 2.7).**

## Register Committee

22/06/2020

Ref. RC27/A83  
Ver. 1.0  
Date 2020-06-25  
Page 5 / 6

### ESG 3.1 – Activities, policy and processes for quality assurance

33. According to the analysis of the panel, there is a lack of student representation. Students are neither involved in the governing body nor in the bodies that review and design the agency's procedures or take decisions on the adoption of such procedures (Governing and Advisory Board). The agency stated (in its Statement to the Review Report) that the Student Board is an Advisory Body and that students can contribute in that capacity to the governance and work of the agency.

34. Considering the compliance levels with ESG 3.1, the Committee underlined the **limited involvement of students in the agency's governance and work**. While the legislation does not prescribe their involvement in the agency's Board of Directors, ACSUCYL may nevertheless improve its consultation process and also request a change of its current legal framework.

**35. The Register Committee was therefore unable to concur with the panel's conclusion of compliance, but concluded that ACSUCYL complies only partially with the ESG 3.1.**

### ESG 3.3 – Independence

36. In terms of organisational independence, the evidence presented by the panel shows that members of the Governing Board are appointed by the regional minister responsible for universities and that the Governing Board has a strong representation of its regional Government, including the Chairperson.

37. The panel's analysis further show that the agency is largely dependent on the regional Government, not only for the appointment of its Governing Board members, but also for the approvals and hiring of new staff and the annual approval of its budget.

**38. The Register Committee therefore could not concur with the conclusion of the panel of (full) compliance, but concluded that ACSUCYL complies only partially with the ESG 3.3.**

39. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

## Conclusion:

40. Based on the external review report and the considerations above, the Register Committee concluded that ACSUCYL demonstrated compliance with the ESG (Parts 2 and 3) as follows:

**Register Committee**  
22/06/2020

**Ref.** RC27/A83  
**Ver.** 1.0  
**Date** 2020-06-25  
**Page** 6 / 6

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Substantial compliance	Compliance
2.3	Full compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Full compliance	Compliance
2.6	Substantial compliance	Compliance
2.7	Full compliance	Compliance
3.1	Substantial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Partial compliance
3.4	Substantial compliance	Compliance
3.5	Substantial compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

41. The Register Committee considered that ACSUCYL only achieved partial compliance with some standards. In its holistic judgement, the Register Committee recognised that ACSUCYL was working to address the two issues within the constraints of its legal framework. The Committee therefore concluded that ACSUCYL continues to comply substantially with the ESG as a whole.

42. The Register Committee therefore approved the application and renewed ACSUCYL's inclusion on the Register. ACSUCYL's renewed inclusion shall be valid until 30/11/2024<sup>1</sup>.

43. The Register Committee further underlined that ACSUCYL is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

EQAR | Aarlenstraat 22 Rue d'Arlon 22 | BE-1050 Brussels

Quality Assurance Agency for the University System of Castilla y León  
(ACSUCYL)

Sandra Marcos Ortega, Senior Consultant

Edificio Emilio Alarcos  
Avd. Reyes Católicos, N° 2

47006Valladolid  
Spain

Brussels, 21 January 2019

## Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A83 of 20/12/2018

Dear Sandra,

We hereby confirm that the application by ACSUCYL for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA - European Association for Quality Assurance of Higher Education fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of ACSUCYL are within the scope of the ESG:

- *Verification of official degrees (ex-ante accreditation)/modification*
- *Follow-up of official degrees*
- *Renewal of accreditation of official degrees (ex-post accreditation)*
- *Institutional accreditation\* (ELENCHOS)*
- *Certification of the implementation of the internal quality assurance system\* (ELENCHOS)*
- *Teaching performance assessment programme (DOCENTIA Programme)*
- *Evaluation to create, recognize, modify or withdraw university centres*
- *University research institutes (ex-ante evaluation)*

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EQAR Founding Members:



- *Periodic evaluation of university research institutes.*

We note that ACSUCYL has recently introduced the ELENCHOS Programmes and that these activities have been considered by the Committee in ACSUCYL's change report.

Please ensure that ACSUCYL's self-evaluation report covers all the aforementioned activities, including any external quality assurance activities the agency plans to carry out within or outside the European Higher Education Area.

We further remind you that the following issues were flagged when ACSUCYL's registration was last renewed, and should be addressed in your self-evaluation report and the external review report:

***ESG 2.3: Implementing processes [ESG 2005: standard 2.6]***

*It should receive attention whether follow-up procedures were implemented for degrees between the first ex-post accreditation and consecutive periodic re-accreditations.*

***ESG 2.7: Complaints and appeals [ESG 2005: standard 3.7]***

*It should be addressed how ACSUCYL has revised its appeals system and whether it ensured that appeals are handled by a committee separate from the one that made the appealed decision.*

We confirm that the following activities are not within the scope of the ESG:

- *Evaluation of Teaching Staff*
- *Evaluation of emeritus professors*
- *Research projects (ex ante and ex post evaluation)*
- *Research staff evaluation*

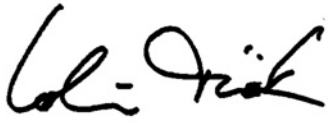
While these activities are not relevant to your application, it is ACSUCYL's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA - European Association for Quality Assurance of Higher Education in its capacity of the coordinator of the external review. At the same time we underline that it is ACSUCYL's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ACSUCYL has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.



Yours sincerely,



Colin Tück  
(Director)

Cc: ENQA (coordinator)

# Application by ACSUCYL - Quality Assurance Agency for the University System of Castilla y León (ACSUC YL) for Renewal of Registration

## Minutes of Telephone Conversation

Register Committee

Ref. A83  
Date 2020-06-23  
Page 1 / 1

<b>Date of the conversation:</b>	9 January 2019
<b>Representative of ACSUCYL:</b>	Sandra Marcos
<b>Representative of EQAR:</b>	Melinda

1. ACSUCYL has submitted on 20/12/2018 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and ACSUCYL's activities within the scope of the ESG, EQAR contacted ACSUCYL via telephone to clarify the matters below.
3. ACSUCYL agreed to clarify the matters by means of a telephone conversation.
4. The activity of 'follow-up of official degrees' refers to the monitoring of university degrees that was covered in the previous review of ACSUCYL.
5. The activity 'verification of official degrees' (ex-ante accreditation) and the activity 'renewal of accreditation of official degrees' (ex-post accreditation) are distinct activities concerned with the accreditation of university degree. These activities were covered in the last external review of the agency.
6. In the eligibility application ACSUCYL included two newly developed activities i.e. 'institutional accreditation of university centers' and 'certification of IQAS implementation'. These activities were described by ACSUCYL in its change report sent to EQAR on 19.11.2019.
7. The protocol for the activity 'evaluation to create, recognise, modify or withdraw university centers' has been revised. ACSUCYL noted that the procedure has remained largely the same e.g. same evaluation criteria and it is similarly to the institutional accreditation procedure. So far no such evaluations were carried out.
8. ACSUCYL confirmed that the agency has signed collaboration agreements for quality assessments in Latin America, but so far the agency has not carried out any external QA activities outside Spain.

**Mr. Colin Tuck**  
Director of EQAR  
Aarlenstraat 22 Rue d'Arlon  
1050 Brussels,  
Belgium

Valladolid 21/01/2020

### **ACSUCYL STATEMENT ON THE EXTERNAL REVIEW REPORT**

We would like to thank the Register for giving ACSUCYL the opportunity to provide some additional clarification, to the external review report, for a better understanding. We hope this information provided helps to the evaluation.

#### **GENERAL REMARKS**

While ACSUCYL appreciate the recommendations made by the external experts it would also like to highlight that the evaluation has been very critical. It has happened in some criteria (with no significant change in the new version) in which the agency didn't change the way in which performs its activity.

As general remark, we understand that the third round of evaluation must be more demanding in some issues but, not in the fulfilment of criteria. We have the feeling that some of the criteria with the same evidence could be also fully compliance not substantial.

On the other hand, we would like to clarify that ACSUCYL has tried to be self-critical when drafting the SAR, that's why we have included in each criterion the room for improvement after the analysis. On the other hand, we understand that the institutional evaluation of the research institutes may not fully comply with ESG 2015. When we include this procedure in the SAR there were no intention of not being transparent or clear, we have all information about the process published and we gave all information as we have been done in previous evaluation where the evaluation of the research institutes were included.

As regards the specific statements about the criteria we would like to indicate the following:

#### **CRITERION 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE**

Regarding the recommendation we would like to clarify that the Student Board is an Advisory Body, Annex III. They are involved as the Advisory Board is in the development of the strategic plan, the annual plan, the development of procedures...

It is true that the legislation doesn't contemplate the possibility of having students but it is also true that the functions of the Board of Directors are very limited regarding quality assurance so

that we can totally ensure the independence. As it can be checked, Annex II, the functions of the Board of Directors in which students could contribute (mainly related to QA) such as the strategic plan or annual plan, are previously informed by the Students Board so we guarantee their participation on them.

Anyway, we have identified as a weakness the low degree of involvement of students as they don't feel contributing to the Agency. Most of them understand the agency as a platform to complain about their personal problems. So we understand we have room for improvement on it but we don't think in the way it is recommended.

### **CRITERION 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Apart of the information provided above in criterion 3.1, we would like to clarify that as students are also part of the external experts they are asked as any other expert how to develop the quality assurance procedures when making the meta-evaluation process.

As regards the development of new procedures we ask the student's board as it has been indicated in the criterion 3.1.

### **CRITERION 2.4 PEER-REVIEW EXPERTS**

As regards the recommendation made by the panel, we understand that the trainings should focus more on SCL, as we have also noticed that the experts have not enough knowledge on how it must be evaluated, but on the other hand, we feel that this recommendation is already implicit in the recommendation of the criteria 1.3.

In 2.4, we understand that the performance, composition of the expert's panels, selection, involvement of students in panels, and trainings should be demonstrated that fulfil with the specifications of the criteria. In this regard ACSUCYL has demonstrate it as it is said in the SAR.

On the other hand, ACSUCYL didn't change at all the way in which, in general, have performed in this regard. We have increase the number of trainings and we have improved as we record the trainings so the experts can access to the training at any time. In addition, the Agency use the procedure to explain the criteria in which are included the interpretation of the criteria, included SCL.

### **CRITERION 2.6 REPORTING**

Regarding the reports of verification programme, we would like to clarify that these reports include recommendations about how to improve the programme. If the report doesn't include information is because the design of the programme fulfil all the requirements. It is important to take into account that the documentation provided by the university is a

declaration of intent as the programme doesn't exist so, no good practices for instance can be detected. The evaluation is prior to the implementation so they have just to demonstrate that they are in line with the criteria and they fulfil them. If so, no comments can be done more than the criteria is fulfilled. However, in the case they don't fulfil or there is room for improvement the reports reflect on it.

As regards the publication of the follow-up reports we have detected that there were an error as the reports produced in 2014 and 2015 were indicated as 2013. On the other hand the reports produced in 2019 are already published:  
<http://seguimiento2.acsucyl.com/AcsucylWeb/buscadorTitulos/busqueda.jsp>

Finally the reports about ELENCHOS programme are also published:

<http://www.acsucyl.es/web/es/programas-evaluacion/acreditacion-institucional-certificacion-sistemas.html>

Valladolid 21 January 2020



José Ángel Dominguez Pérez  
Director of ACSUCYL

Brussels, 31 January 2020

## Application by ACSUCYL for renewal of registration on EQAR

Dear Padraig,

The Quality Assurance Agency for the University System of Castilla y León (ACSUCYL) has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 28/11/2019 on which ACSUCYL's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of ACSUCYL's application.

### ESG 3.1 Activities, policy and processes for quality assurance

A. The activity '*ex ante and periodic evaluation of university research institutes*' was confirmed by the EQAR Register Committee as one of the eligible activities to be reviewed as part of ACSUCYL's review (see Eligibility Confirmation and Terms of Reference).

We noted that the panel decided to not consider this activity against the ESG (see ERR, p.3) after the panel learned, during its site visit, that the focus of the activity is on research rather than on teaching and learning. We further note that ACSUCYL addresses the formal education programmes (i.e. master and doctoral degrees) offered by or in cooperation with the university research institutes within its programme assessments.

According to the protocol for the assessment of the university research institute (see Annex X to the self-evaluation report), ACSUCYL nevertheless addresses some aspects related to the training of PhD and master students.

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EQAR Founding Members:

We would therefore kindly ask the panel to clarify to what extent the evaluation of university research institutes considers the teaching and learning of postgraduate studies (PhD and masters)?

B. We further learned from the agency's Self-Evaluation Report that ACSUCYL carries out other programme assessments of higher arts degrees and reviews of the quality assurance systems of centres offering higher arts courses (p. 20 of SER).

This activity was not mentioned at application stage (neither as within nor as outside the scope of the ESG) and the agency declared that the activity was not within the scope of the ESG.

We would kindly ask you to clarify whether the panel had further information on this activity, whether the centres offering 'higher arts courses' belong to one of the three cycles of higher education and whether such activities are also addressed by ACSUCYL's external QA activities that are covered by the panel in its report?

#### **ESG 2.4 Peer-review experts**

In its review report (p. 39), the panel noted that "when the nature of the assessment in question so requires, every effort is made to include non-academic experts [...] as well as students who are experienced in quality assessment in higher education".

Could you please clarify if there are activities in which students are not part of ACSUSCYL's review panels?

#### **ESG 2.6 Reporting**

While ACSUCYL publishes the results of its positive external evaluations, the rapporteurs were unclear whether the agency also makes public the assessment reports with a negative result, in particular the assessment carried out under the *verification of official degrees (ex-ante accreditation)*.

Could you please clarify whether such reports are published by ACSUCYL?

We would be grateful if it was possible for you to respond by **15 February 2020**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ACSUCYL's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)

Cc: Pieter-Jan Van de Velde (secretary)  
ENQA (coordinator)  
ACSUCYL



Mr. Colin Tück,  
Director  
EQAR  
Aarlenstratt 22 rue d'Arlon  
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BELGIUM

5 February 2020

Re: Application by ACSUCYL for renewal of registration on EQAR

Dear Colin,

I refer to your letter of 31 January last in relation to the application by the Spanish quality assurance agency ASCUSCYL for renewal of registration on EQAR.

In relation to your queries, I am happy (having consulted with the other evaluation team members) to provide the following clarifications in relation to the queries contained within your letter.

***ESG 3.1 Activities, policy and processes for quality assurance***

***A.***

*The activity 'ex ante and periodic evaluation of university research institutes' was confirmed by the EQAR Register Committee as one of the eligible activities to be reviewed as part of ACSUCYL's review (see Eligibility Confirmation and Terms of Reference).*

*We noted that the panel decided to not consider this activity against the ESG (see ERR, p.3) after the panel learned, during its site visit, that the focus of the activity is on research rather than on teaching and learning.*

*We further note that ACSUCYL addresses the formal education programmes (i.e. master and doctoral degrees) offered by or in cooperation with the university research institutes within its programme assessments.*

*According to the protocol for the assessment of the university research institute (see Annex X to the self-evaluation report), ACSUCYL nevertheless addresses some aspects related to the training of PhD and master students.*

*We would therefore kindly ask the panel to clarify to what extent the evaluation of university research institutes considers the teaching and learning of postgraduate studies (PhD and masters)?*

In considering the various procedures that the agency operates, the panel were guided by the scope of the ESG, in particular that 'the focus of the ESG is on quality assurance related to learning and teaching in higher education including the learning environment and relevant links to research and innovation.' (ESG, p7, 2015)

In considering the procedures that ACSUCYL conducts that were deemed to be within the scope of the terms of reference of the review, the panel noted that, the formal education programmes (masters and doctoral) degree offered by or in cooperation with university research institutes were covered by the agency's degree assessment procedures and followed ESG requirements. Decisions related to the outcomes of these evaluations are within the purview of the Degree Assessment

Commission. The composition of the evaluation panels complies with ESG and includes student members.

The panel noted that the evaluation of University Research Institutes was offered by ACSUCYL as being in scope for ESG and presumably this was the basis on which it was included in the Terms of Reference for the review. Upon receipt of the self-evaluation report and noting the comments of the panel members (who can read Spanish) who read the publicly available documents on the applied evaluation frameworks and the published summary results (no individual reports are published), the team formed the view, in advance of the site visit and also during the team's preparatory meeting that these exercises are largely concerned with the graded evaluation of research quality.

During the panel's first meeting with the agency's Director at 09:00 on 26<sup>th</sup> June (see timetable in the report), the team asked the Director to explain why the Research Institute evaluations were considered in the Terms of Reference. He explained what the focus of this kind of review was and it was clearly about research quality.

Notwithstanding, the team proceeded with the agreed timetable of meetings and went on to meet with four representatives of the Research Assessment Commission (at 16:30 on 27<sup>th</sup> June). The representatives clearly explained to the panel that their work is the evaluation of research quality, among other things through the evaluation of research proposals and projects, as well as the recognition of research institutes. They do not evaluate Masters' and PhD training programmes. These programmes are examined through the degree evaluation procedures and are the business of the Degree Assessment Commission.

We subsequently met with two representatives from the reviewers' pool for research assessment (at 17:30 on 27<sup>th</sup> June). They confirmed the findings of the previous meeting. They also confirmed that the assessment panels consist of academic experts that are capable of judging research quality and therefore do not contain students.

Following these meetings, the panel discussed our findings with the Director in our meeting at 11:00 on 29<sup>th</sup> June.

We clearly signalled our analysis that the evaluation of university research institutes does not fit within the scope of the ESG. Based on our findings, the director agreed with this analysis. Furthermore, we mentioned this in our draft report to the agency, which did not challenge our analysis on this topic.

So, as mentioned in our report, we concluded it was not appropriate to judge the evaluation of university research institutes to fit within the scope of the ESG.

As indicated in our report, we noted that the agency pays extensive attention to the quality of teaching staff, in Bachelor's, as well as in Master's and PhD programmes. Separate handbooks guarantee that at every level this is assessed. This includes the staff that are also connected to research institutes. Within the scope of this review, the quality aspects referring to the available teaching staff are reviewed as part of the standard dealing with academic staff or human resources in the verification, modification, follow-up and accreditation renewal procedures for degree assessment.

In the Elenchos programme for evaluation of a university's internal quality assurance system or for institutional accreditation, the staff policy is assessed, as well as how the centre guarantees and

enhances the quality of its academic staff. Regarding the DOCENTIA programme, the quality assurance of the teaching activity is the main focus of the procedure.

We consider that it would be useful to discuss and analyse in greater detail with agencies which activities they should put forward in their Terms of Reference, to avoid such situations in the future.

**B.**

*We further learned from the agency's Self-Evaluation Report that ACSUCYL carries out other programme assessments of higher arts degrees and reviews of the quality assurance systems of centres offering higher arts courses (p. 20 of SER).*

*This activity was not mentioned at application stage (neither as within nor as outside the scope of the ESG) and the agency declared that the activity was not within the scope of the ESG.*

*We would kindly ask you to clarify whether the panel had further information on this activity, whether the centres offering 'higher arts courses' belong to one of the three cycles of higher education and whether such activities are also addressed by ACSUCYL's external QA activities that are covered by the panel in its report?*

The review team also noted the reference to these programmes in the agency's SER but further noted that (i) the Terms of Reference did not specifically refer to the assessment of higher arts degrees and quality assurance systems of centres offering higher arts courses and (ii) these activities were not included in the EQAR eligibility letter, the panel did not specifically assess those evaluation schemes.

The panel formed the view was that it is not its responsibility of a panel to search for additional activities which might be within the scope of ESG if they are not explicitly mentioned in the Terms of Reference and in any case, the SER did not provide us with enough information to decide that the Terms of reference needed to be adapted, nor did the agency propose any meetings with stakeholders related to those activities.

As in 3.1 A above, we consider that it would be useful to discuss and analyse in greater detail with agencies which activities they should put forward in their Terms of Reference, to avoid such situations in the future.

**ESG 2.4 Peer-review experts**

*In its review report (p. 39), the panel noted that "when the nature of the assessment in question so requires, every effort is made to include non-academic experts [...] as well as students who are experienced in quality assessment of higher education".*

*Could you please clarify if there are activities in which students are not part of ACSUSCYL's review panels?*

The panel noted that students are not members of the panels that conduct the evaluation of University Research Centres as the focus of such evaluations is on research quality but as noted previously, the panel concluded that these evaluation exercises are not in scope for ESG. All other evaluation procedures examined by the review team that are within the scope of ESG contain student members as part of the panels.

## ESG 2.6 Reporting

*While ACSUCYL publishes the results of its positive external evaluations, the rapporteurs were unclear whether the agency also makes public the assessment reports with a negative result, in particular the assessment carried out under the verification of official degrees (ex-ante accreditation).*

*Could you please clarify whether such reports are published by ACSUCYL?*

The agency stated in its handbook for the procedure for the verification and modification of official degrees the following:

“In accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), and as a full member of ENQA and registered with EQAR, ACSUCYL will publish the assessment reports for verification and modification of curricula in a manner that is both clear and accessible to the academic community as well as to external members and any other person who is interested.

The reports will be published on ACSUCYL'S website when the University Council, as the body responsible for taking the formal decision concerning verification and modification of curricula, publishes said decision.”

The panel does not have any indication that negative reports are not published. It, however, did not explicitly discuss this specific topic. We did, however, check published negative reports on the verification stage of the DOCENTIA programme.

I hope this of assistance to the Register Committee.

Regards,

---

Dr. Pdraig Walsh  
Chair, ACSUCYL Review Team

Brussels, 31 January 2020

## Application by ACSUCYL for renewal of registration on EQAR

Dear Padraig,

The Quality Assurance Agency for the University System of Castilla y León (ACSUCYL) has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 28/11/2019 on which ACSUCYL's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of ACSUCYL's application.

### ESG 3.1 Activities, policy and processes for quality assurance

A. The activity '*ex ante and periodic evaluation of university research institutes*' was confirmed by the EQAR Register Committee as one of the eligible activities to be reviewed as part of ACSUCYL's review (see Eligibility Confirmation and Terms of Reference).

We noted that the panel decided to not consider this activity against the ESG (see ERR, p.3) after the panel learned, during its site visit, that the focus of the activity is on research rather than on teaching and learning. We further note that ACSUCYL addresses the formal education programmes (i.e. master and doctoral degrees) offered by or in cooperation with the university research institutes within its programme assessments.

According to the protocol for the assessment of the university research institute (see Annex X to the self-evaluation report), ACSUCYL nevertheless addresses some aspects related to the training of PhD and master students.

European Quality Assurance  
Register for Higher Education  
(EQAR) aisbl

Aarlenstraat 22 rue d'Arlon  
1050 Brussels  
Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

info@eqar.eu  
www.eqar.eu

VAT BE 0897.690.557

EQAR Founding Members:

We would therefore kindly ask the panel to clarify to what extent the evaluation of university research institutes considers the teaching and learning of postgraduate studies (PhD and masters)?

B. We further learned from the agency's Self-Evaluation Report that ACSUCYL carries out other programme assessments of higher arts degrees and reviews of the quality assurance systems of centres offering higher arts courses (p. 20 of SER).

This activity was not mentioned at application stage (neither as within nor as outside the scope of the ESG) and the agency declared that the activity was not within the scope of the ESG.

We would kindly ask you to clarify whether the panel had further information on this activity, whether the centres offering 'higher arts courses' belong to one of the three cycles of higher education and whether such activities are also addressed by ACSUCYL's external QA activities that are covered by the panel in its report?

#### **ESG 2.4 Peer-review experts**

In its review report (p. 39), the panel noted that "when the nature of the assessment in question so requires, every effort is made to include non-academic experts [...] as well as students who are experienced in quality assessment in higher education".

Could you please clarify if there are activities in which students are not part of ACSUSCYL's review panels?

#### **ESG 2.6 Reporting**

While ACSUCYL publishes the results of its positive external evaluations, the rapporteurs were unclear whether the agency also makes public the assessment reports with a negative result, in particular the assessment carried out under the *verification of official degrees (ex-ante accreditation)*.

Could you please clarify whether such reports are published by ACSUCYL?

We would be grateful if it was possible for you to respond by **15 February 2020**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ACSUCYL's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)

Cc: Pieter-Jan Van de Velde (secretary)  
ENQA (coordinator)  
ACSUCYL

Brussels, 6 April 2020

Dear Sandra,

The EQAR Register Committee have been considering ACSUCYL's application for renewal of registration and compliance with the ESG based on the external review report of 28/11/2019.

According to ACUCYL's Self-Evaluation Report (p. 20) the agency carries out *assessment of higher arts degrees and reviews of centres offering higher arts courses* and these activities "derive from regulations that may be referenced to the ESG". The Register Committee further sought and received clarifications from the Chair of the review panel (see response of 06/02/2020, attached).

These activities were not declared and described by the agency in its application of 20/12/2018. Consequently, they were not addressed in EQAR's eligibility confirmation, were not mentioned in the Terms of Reference for the review and, thus, not addressed by the review panel.

The Register Committee was therefore unable to analyse the compliance of these activities with the ESG and has therefore not been able to take a decision on your application.

We therefore kindly ask ACSUCYL to provide the reasoning why these two activities were not mentioned in the application of 20/12/2018 and to clarify whether these activities are similar or identical to ACSUCYL's other external QA activities that are covered by the panel in its report.

If the activities are not conducted based on existing procedures please describe the *assessment of higher arts degrees* and the *reviews of centres offering higher arts* referring to the following aspects:

- I. purposes and development of the activity, involvement of stakeholders (ESG 2.2)
- II. criteria used, how they were developed, measures implemented to ensure consistency, how ESG 1.1 – 1.10 are reflected in the criteria (ESG 2.1 & 2.5)
- III. review team composition, selection, appointment and training of reviewers (ESG 2.4)

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IV. site visits (ESG 2.3)

V. publication of reports (ESG 2.6)

VI. follow-up (ESG 2.3)

VII. appeals system (ESG 2.7)

embedding in thematic analyses and internal quality assurance of the agency (ESG 3.4 & 3.6)

We would be grateful if it was possible for you to respond by 08/05/2020, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ACSUCYL's application.

Kind regards,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke.

Karl Dittrich  
President, Chair of the Register Committee

**Attached:** Clarification request and response by the panel re.  
ACSUCYL application

Mr. Colin Tück,  
Director  
EQAR  
Aarlenstratt 22 rue d'Arlon  
BE-1050 Brussels  
BELGIUM

5 February 2020

Re: Application by ACSUCYL for renewal of registration on EQAR

Dear Colin,

I refer to your letter of 31 January last in relation to the application by the Spanish quality assurance agency ASCUSCYL for renewal of registration on EQAR.

In relation to your queries, I am happy (having consulted with the other evaluation team members) to provide the following clarifications in relation to the queries contained within your letter.

***ESG 3.1 Activities, policy and processes for quality assurance***

***A.***

*The activity 'ex ante and periodic evaluation of university research institutes' was confirmed by the EQAR Register Committee as one of the eligible activities to be reviewed as part of ACSUCYL's review (see Eligibility Confirmation and Terms of Reference).*

*We noted that the panel decided to not consider this activity against the ESG (see ERR, p.3) after the panel learned, during its site visit, that the focus of the activity is on research rather than on teaching and learning.*

*We further note that ACSUCYL addresses the formal education programmes (i.e. master and doctoral degrees) offered by or in cooperation with the university research institutes within its programme assessments.*

*According to the protocol for the assessment of the university research institute (see Annex X to the self-evaluation report), ACSUCYL nevertheless addresses some aspects related to the training of PhD and master students.*

*We would therefore kindly ask the panel to clarify to what extent the evaluation of university research institutes considers the teaching and learning of postgraduate studies (PhD and masters)?*

In considering the various procedures that the agency operates, the panel were guided by the scope of the ESG, in particular that 'the focus of the ESG is on quality assurance related to learning and teaching in higher education including the learning environment and relevant links to research and innovation.' (ESG, p7, 2015)

In considering the procedures that ACSUCYL conducts that were deemed to be within the scope of the terms of reference of the review, the panel noted that, the formal education programmes (masters and doctoral) degree offered by or in cooperation with university research institutes were covered by the agency's degree assessment procedures and followed ESG requirements. Decisions related to the outcomes of these evaluations are within the purview of the Degree Assessment

Commission. The composition of the evaluation panels complies with ESG and includes student members.

The panel noted that the evaluation of University Research Institutes was offered by ACSUCYL as being in scope for ESG and presumably this was the basis on which it was included in the Terms of Reference for the review. Upon receipt of the self-evaluation report and noting the comments of the panel members (who can read Spanish) who read the publicly available documents on the applied evaluation frameworks and the published summary results (no individual reports are published), the team formed the view, in advance of the site visit and also during the team's preparatory meeting that these exercises are largely concerned with the graded evaluation of research quality.

During the panel's first meeting with the agency's Director at 09:00 on 26<sup>th</sup> June (see timetable in the report), the team asked the Director to explain why the Research Institute evaluations were considered in the Terms of Reference. He explained what the focus of this kind of review was and it was clearly about research quality.

Notwithstanding, the team proceeded with the agreed timetable of meetings and went on to meet with four representatives of the Research Assessment Commission (at 16:30 on 27<sup>th</sup> June). The representatives clearly explained to the panel that their work is the evaluation of research quality, among other things through the evaluation of research proposals and projects, as well as the recognition of research institutes. They do not evaluate Masters' and PhD training programmes. These programmes are examined through the degree evaluation procedures and are the business of the Degree Assessment Commission.

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Following these meetings, the panel discussed our findings with the Director in our meeting at 11:00 on 29<sup>th</sup> June.

We clearly signalled our analysis that the evaluation of university research institutes does not fit within the scope of the ESG. Based on our findings, the director agreed with this analysis. Furthermore, we mentioned this in our draft report to the agency, which did not challenge our analysis on this topic.

So, as mentioned in our report, we concluded it was not appropriate to judge the evaluation of university research institutes to fit within the scope of the ESG.

As indicated in our report, we noted that the agency pays extensive attention to the quality of teaching staff, in Bachelor's, as well as in Master's and PhD programmes. Separate handbooks guarantee that at every level this is assessed. This includes the staff that are also connected to research institutes. Within the scope of this review, the quality aspects referring to the available teaching staff are reviewed as part of the standard dealing with academic staff or human resources in the verification, modification, follow-up and accreditation renewal procedures for degree assessment.

In the Elenchos programme for evaluation of a university's internal quality assurance system or for institutional accreditation, the staff policy is assessed, as well as how the centre guarantees and

enhances the quality of its academic staff. Regarding the DOCENTIA programme, the quality assurance of the teaching activity is the main focus of the procedure.

We consider that it would be useful to discuss and analyse in greater detail with agencies which activities they should put forward in their Terms of Reference, to avoid such situations in the future.

**B.**

*We further learned from the agency's Self-Evaluation Report that ACSUCYL carries out other programme assessments of higher arts degrees and reviews of the quality assurance systems of centres offering higher arts courses (p. 20 of SER).*

*This activity was not mentioned at application stage (neither as within nor as outside the scope of the ESG) and the agency declared that the activity was not within the scope of the ESG.*

*We would kindly ask you to clarify whether the panel had further information on this activity, whether the centres offering 'higher arts courses' belong to one of the three cycles of higher education and whether such activities are also addressed by ACSUCYL's external QA activities that are covered by the panel in its report?*

The review team also noted the reference to these programmes in the agency's SER but further noted that (i) the Terms of Reference did not specifically refer to the assessment of higher arts degrees and quality assurance systems of centres offering higher arts courses and (ii) these activities were not included in the EQAR eligibility letter, the panel did not specifically assess those evaluation schemes.

The panel formed the view was that it is not its responsibility of a panel to search for additional activities which might be within the scope of ESG if they are not explicitly mentioned in the Terms of Reference and in any case, the SER did not provide us with enough information to decide that the Terms of reference needed to be adapted, nor did the agency propose any meetings with stakeholders related to those activities.

As in 3.1 A above, we consider that it would be useful to discuss and analyse in greater detail with agencies which activities they should put forward in their Terms of Reference, to avoid such situations in the future.

**ESG 2.4 Peer-review experts**

*In its review report (p. 39), the panel noted that "when the nature of the assessment in question so requires, every effort is made to include non-academic experts [...] as well as students who are experienced in quality assessment of higher education".*

*Could you please clarify if there are activities in which students are not part of ACSUSCYL's review panels?*

The panel noted that students are not members of the panels that conduct the evaluation of University Research Centres as the focus of such evaluations is on research quality but as noted previously, the panel concluded that these evaluation exercises are not in scope for ESG. All other evaluation procedures examined by the review team that are within the scope of ESG contain student members as part of the panels.

## ESG 2.6 Reporting

*While ACSUCYL publishes the results of its positive external evaluations, the rapporteurs were unclear whether the agency also makes public the assessment reports with a negative result, in particular the assessment carried out under the verification of official degrees (ex-ante accreditation).*

*Could you please clarify whether such reports are published by ACSUCYL?*

The agency stated in its handbook for the procedure for the verification and modification of official degrees the following:

“In accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), and as a full member of ENQA and registered with EQAR, ACSUCYL will publish the assessment reports for verification and modification of curricula in a manner that is both clear and accessible to the academic community as well as to external members and any other person who is interested.

The reports will be published on ACSUCYL'S website when the University Council, as the body responsible for taking the formal decision concerning verification and modification of curricula, publishes said decision.”

The panel does not have any indication that negative reports are not published. It, however, did not explicitly discuss this specific topic. We did, however, check published negative reports on the verification stage of the DOCENTIA programme.

I hope this of assistance to the Register Committee.

Regards,

---

Dr. Padraig Walsh  
Chair, ACSUCYL Review Team

**Mr. Karl Dittrich**

President of EQAR

Aarlenstraat 22 Rue d'Arlon

1050 Brussels,

Belgium

Valladolid 06 May 2020

Dear Karl,

As regards the clarification request sent to me on the 6<sup>th</sup> April, we would like to clarify the following to be taken into account in the evaluation of ACSUCYL for its renewal in EQAR.

First of all, ACSUCYL would like to point out that the two activities which this request for information refers to (assessment of higher arts degrees; reviews of centres offering higher art courses) are under the scope of the ESG. Due to a mistake there weren't include.

Anyway, the activities mentioned refer to higher arts courses which are defined within the context of the European Higher Education Area as being of an equivalent level to university degrees:

- Higher Degree in Arts Courses: level 2 (university bachelor's degree) within the Spanish Qualifications Framework for Higher Education; this corresponds to level 6 of the European Qualifications Framework.
- Master's Degree in Arts Courses: level 3 (Master's Degree) of the Spanish Qualifications Framework for Higher Education; this corresponds to level 7 of the European Qualifications Framework.
- Doctorate: level 4 (Doctor) of the Spanish Qualifications Framework for Higher Education; this corresponds to level 8 of the European Qualifications Framework.

In order to be consistent with the rest of the activities carried out by ACSUCYL as well as with the application of the ESG within our region, ACSUCYL conducts the assessment and quality assurance processes for these higher arts courses in the same manner as it does for the processes corresponding to university degrees; in other words:

- Assessment of higher arts courses: carried out within the degree assessment programmes (verification, modification, follow-up, renewal of accreditation).
- Internal quality assessment systems of the centres offering higher arts courses: framed within the institutional quality assessment programmes.

Nevertheless, the legislation governing these courses in Spain differs from the legislation regulating university courses, and establishes certain differences vis-à-vis their organisation and their respective quality assurance processes. Organic Law 2/2006, of 3 May, governing

education specifically regulates higher arts courses, defining them within the context of the European Higher Education Area. The organisation of these courses, as well as their assessment and quality improvement systems are in turn set out under Royal Decree 1614/2009, which was amended in 2015.

In accordance with said Royal Decree, official master's degrees in arts courses must be accredited by being registered in a national register of non-university teaching centres, subsequent to official recognition (equivalent to verification of university degrees) of the curricula by the Ministry of Education, who request a report from the external assessment body of the region in question; in this case, ACSUCYL. Any amendments to these curricula must, in turn, be approved by the Ministry.

In accordance with the above-mentioned legislation, registered master's degrees in arts courses must renew their accreditation each six years by undergoing an assessment process carried out by the external assessment body of the region concerned. The assessment checks to ensure that the corresponding curriculum is being implemented in accordance with the project authorised, by conducting an assessment which includes a site visit to the centre where the degree is taught. In addition, up to the time at which they must undergo assessment to renew their accreditation, the registered degrees are subject to follow-up by the external assessment bodies of the regions in question, based on the publicly available information.

As general mechanisms to ensure the quality of the courses concerned, said Royal Decree also establishes that the education authorities shall promote regular internal and external quality assessment systems and procedures for these courses. The basic reference criteria shall be those defined and stipulated in the context of the European Higher Education Area. To this end, the assessment bodies determined by the relevant education authorities, within the scope of their powers, shall design and implement, in conjunction with higher arts centres, the corresponding internal and external curricular assessment.

Following these guidelines, ACSUCYL has taken the following action in the area of higher arts courses:

- Official recognition and modification of master's degrees in arts courses: to date, assessment for the official recognition of three master's degree courses has been carried out in line with the verification procedure for university master's degrees. One assessment process has also been conducted for the modification of a master's degree.

These assessments were conducted jointly by the Degree Assessment Committee, based on the previous work carried out by the Arts and Humanities Assessment Committee, which is made up of scholars, professionals and students. In order to carry out these assessments, said Committee was helped by experts from the field of higher arts courses. The final assessment reports corresponding to these processes may be consulted on ACSUCYL'S website.

- Internal quality assurance systems (henceforth, IQAS) of higher arts course centres: ACSUCYL is working on drawing up a protocol to certify the IQAS of these centres. This is currently at the draft stage and will need to seek approval from the Institutional Quality Assessment Committee (draft attached). In order to draw up this protocol, the quality assurance model which European higher education systems have adopted, and which has been introduced into official Spanish university courses, has been taken as a benchmark: quality accreditation through certification of the IQAS of the centres responsible for the courses. In other words, this protocol is aligned with the ELENCHOS programme which certifies the implementation of university centres' IQAS.

The public information available on ACSUCYL'S website concerning these activities is structured as follows:

- Assessment of higher arts courses comes under the section 'Assessment of Degrees', albeit in a specific section due to the particular nature of the legislation governing it in Spain.
- Assessment of higher arts centres' IQAS is set out under the section 'Institutional Quality'-'Other programmes'.

In conclusion, it can be said that ACSUCYL is carrying out the two activities mentioned (assessment of higher arts degrees; reviews of centres offering higher arts courses) within the framework of complying with the ESG.

More specifically, with regard to the two issues raised in your letter, we wish to point out that:

- The two activities were specifically included in the application. The fact that they were mentioned on page 20 of the self-report was due to an error, since they should have been mentioned in the part corresponding to Degree Assessment Programmes and Institutional Quality Assessment, respectively.
- As already highlighted, the assessment processes corresponding to these activities are identical to the assessment processes carried out by ACSUCYL both within the framework of degree assessment or in the institutional assessment of university centres.

We hope this clarification helps. Please do not hesitate to contact us for further detail.

Kind regards,

Sandra Marcos Ortega