

**Rejection of the Application  
by National Agency for the Evaluation of Universities and  
Research Institutes (ANVUR)  
for Inclusion on the Register**

**Register Committee**  
16 March 2020

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**Ver.** 1.0  
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| <b>Application of:</b>                           | 26/01/2018   |
| <b>External review report of:</b>                | 20/06/2019   |
| <b>Review coordinated by:</b>                    | European Association for Quality Assurance of Higher Education (ENQA)  |
| <b>Review panel members:</b>                     | Tue Vinter-Jørgensen (chair), Laura Beccari (secretary), Mar Campins Eritja (academic), Ignas Gaižiūnas (student)  |
| <b>Decision of:</b>                              | 16/03/2020   |
| <b>Absented themselves from decision-making:</b> | none   |
| <b>Attachments:</b>                              | <ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 01/03/2018</a></li> <li>2. <a href="#">External Review Report, 20/06/2019</a></li> <li>3. <a href="#">Clarification request to the Review Panel, 10/10/2019</a></li> <li>4. <a href="#">Clarification by the Review Panel, 22/10/2019</a></li> <li>5. <a href="#">Additional representation 20/01/2020</a></li> <li>6. <a href="#">Clarification request to ANVUR, 19/02/2020</a></li> <li>7. <a href="#">Clarification by ANVUR, 06/03/2020</a></li> </ol> |

1. The application of 26/01/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 01/03/2018 having considered clarification received from ANVUR on 08-09/02/2018.
3. The Register Committee considered the external review report of 20/06/2019 on the compliance of ANVUR with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the Chair of the review panel on 22/10/2019.

5. The Register Committee invited ANVUR to make additional representation on the grounds for possible rejection on 05/11/2019.
6. The Register Committee considered ANVUR's additional representation received on 20/01/2020.

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### Analysis:

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7. In considering ANVUR's compliance with the ESG, the Register Committee took into account the following external quality assurance activities:
  - *Initial accreditation of study programmes.*
  - *Periodic accreditation of universities and academic programmes (AVA system).*
  - *Initial and periodic accreditation of institutions and programmes in Art, Music and Dance (AFAM).*
  - *Accreditation (authorisation) of PhD Programmes.*
8. We confirm that the following activities are not within the scope of the ESG and, thus, not pertinent to the application for inclusion on the Register:
  - *Institutional evaluation of quality of research products.*
  - *Evaluation of administrative activities in public universities and research institutes.*
  - *Accreditation of post-graduate medical programmes (see below and ESG 3.1).*
9. The Register Committee noted that the activity *Accreditation of new higher education institutions* has been suspended and therefore not considered by the panel during the external review.
10. While the *Accreditation of post-graduate medical programmes* was initially considered an activity within the scope of the ESG, the Register Committee learned from the review panel's report that this activity is coordinated by the National Observatory on medical formation and that ANVUR's involvement is limited to collecting and handling data on the qualifications of scientific staff (EER, p.10-11).
11. As the panel's understanding seemed to be in contrast with the presentation of the activity on ANVUR's website, the Register Committee sought further clarification. In its response, the panel explained that ANVUR's tasks clearly did not represent an external quality assurance process that falls under the scope of the ESG. Following the explanations of the panel, the Register Committee concurred with the conclusion that ANVUR's contribution to the *Accreditation of post-graduate medical programmes* is not within the scope of the ESG.
12. The Register Committee found that the report provides sufficient evidence and analysis on ANVUR's level of compliance with the ESG.

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

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## **ESG 2.1 – Consideration of internal quality assurance**

14. The Register Committee sought clarification from the panel regarding the terms “PhD courses” and “PhD Programmes”. The panel clarified that no difference was intended and that both terms refer to “PhD Programmes”.

15. The panel noted that ANVUR fully integrates Part 1 of the ESG in AVA procedures, but that AFAM and PhD accreditation procedures cover only some aspects of ESG 1.1 - 1.10.

16. In its additional representation ANVUR explained that AFAM and PhD accreditation procedures are limited in scope due to the existing Italian legal framework. ANVUR further added that it had already taken steps to integrate aspects of ESG 1.1 - 1.10 in these procedures by revising its own methodologies and guidelines for AFAM procedures and by testing its new preliminary evaluation protocol for PhD Programmes during two institutional visits.

17. **The Register Committee welcomed that ANVUR has intensified its dialogue with the relevant Ministry in order to review the appropriate regulations for its AFAM and PhD procedures, but considered that the changes have not yet been enacted and the agency has thus not yet fully addressed its compliance with ESG 2.1 in practice.**

18. **The Register Committee therefore concurred with the panel’s conclusion that ANVUR complies only partially with ESG 2.1 pending adoption of the revised guidelines.**

## **ESG 2.4 – Peer-review experts**

19. According to the review report, students are only part of the expert panels for the *Periodic accreditation of universities and academic programmes (AVA system)* procedures, but are not included in any of the other external QA activities of ANVUR, i.e. in the *initial accreditation of study programmes*, the *accreditation of PhD programmes* and in the *initial and the periodic accreditation of institutions and programmes in Art, Music and Dance (AFAM system)*.

20. The Register Committee further noted that student experts contribute to the panel report on student-related issues and that student experts received a different fee than other experts. The Register Committee therefore sought further clarification from the panel on whether students are equally and fully involved in the expert review panels of the AVA system.

21. The panel confirmed that students are involved in all steps of the AVA system’s processes. In preparing the report, each panel member drafts certain parts of the report, whereas students normally draft the chapters related to student related issues.

22. In its additional representation ANVUR acknowledged the lack of student

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experts in review panels, and referred to the involvement of students in the internal consultation process on new study programmes. ANVUR added that starting from November 2019, the agency has included (PhD) students in the evaluation groups for PhD programmes at two institutions. The agency also presented its plans to involve students in the AFAM's external reviews, starting with a pilot project during 2020.

23. ANVUR further stated that starting in 2021 the fees will be aligned between the faculty panel members and student panel members.

24. The Register Committee considered that if student experts have an equal role in panels there is no ground for paying them differently, and welcomed ANVUR's commitment to change its practice in that regard.

25. The Register Committee underlined that the consultation of student representatives in the institutions' internal preparation processes for new study programmes cannot replace the requirement of the standard, i.e. that students are part of ANVUR's expert groups.

**26. The Register Committee therefore welcomed the plans and steps taken by the agency to ensure the involvement of students in its external review panels that currently do not include students as a general practice. The Committee, however, considered that this has not yet been implemented across all of the agencies external quality assurance activities.**

27. The Register Committee therefore concurred with the panel's conclusion that ANVUR complies only partially with ESG 2.4 as it stands.

## ESG 2.6 – Reporting

28. The panel's findings show that ANVUR only publishes synthetic reports, resulting from its AVA system reviews, while the experts' full reports from its other external QA activities have not been made available to the general public.

29. The Register Committee underlined that while higher education institutions may decide to publish the reports on their own website, that ANVUR is expected to publish itself the full reports by the experts and that it should make its reports and decisions clear and easily accessible to the academic community, external partners and other interested individuals.

30. In its additional representation, ANVUR stated that the new AVA guidelines would address the issue of the publication of full reports and final decisions. As from the second round of the institutional accreditations in 2021, ANVUR would publish its full AVA reports; the same would apply to reports resulting from its other activities.

**31. The Register Committee welcomed the commitment by the agency to ensure the publication of full reports as from 2021, but considered that at the moment the agency continues to only publish the summary reports of the AVA system and no reports from any of its other procedures.**

32. Pending the implementation of the planned changes, the Register Committee therefore concurred with the panel's conclusions that ANVUR complies only partially with ESG 2.6.

## ESG 2.7 – Complaints and appeals

33. The panel noted in the review report that a clear and transparent formal complaints procedure within ANVUR was not yet fully developed.

34. The panel also noted that there was no specific appeals committee, but that the Governing Board fulfilled both the role of the accreditation body and that of the re-examination body.

35. The Register Committee further noted there that the agency has no clear processes in handling complaints (EER, p. 51-52).

36. In light of these concerns and the panel's conclusion of compliance, the Register Committee sought further clarifications. The panel responded that the spirit of the standard was followed in practice, although the clarity and transparency of appeals processes could be further improved. The panel received confirmations during its interviews that the procedures were in place and that all involved actors seemed to be satisfied with the current system. In terms of handling appeals the panel clarified that ANVUR's Governing Board has re-examined appeals for PhD programmes and new university programmes.

37. The Register Committee noted that since appeals are handled by the same body (the Governing Board) that takes the initial decision, the impartiality and fairness of ANVUR's decision-making on appeals was questionable.

38. In its additional representation ANVUR stated that it had now published on its website further information about its appeals and complaints processes.

39. The Register Committee sought further clarifications from ANVUR on any intended changes meant to address the impartiality of its appeals processes.

40. In its response letter, ANVUR explained that its Governing Board had now approved the establishment of a separate Appeals' Committee, which will include a member from ANVUR's Governing Board, one member appointed by the Board of Rectors of Italian Universities and one member from the National Authority for anti-corruption, transparency and public procurement (ANAC).

**41. The Register Committee welcomed the decision to establish a distinct Appeals Committee to handle appeals. However, as the new process of handling appeals is not yet fully in place according to the information at its disposal, the Register Committee remained unable to conclude that ANVUR meets the requirement of the standard, but concluded that ANVUR complies only partially with standard 2.7.**

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

42. The Register Committee found the presentation of the *accreditation of post-graduate programmes in medicine and healthcare* inconsistent with

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the presentation of the activity on ANVUR's website, where the activity was described together with ANVUR's *accreditation of PhDs programmes*, as an accreditation activity under the responsibility of ANVUR.

43. The Committee therefore underlined the panel's remarks (letter of 22/10/2019) that in order to avoid misunderstandings, ANVUR should make a clearer description of its different activities on its website.

44. In its additional representation ANVUR presented the clear distinction of its activities, which was published on its website. ANVUR created separate pages which clarifies transparently the activities within and outside the scope of the ESG.

**45. As the issue of a clear separation of external QA activities within and outside the scope of the ESG was addressed, the Register Committee was able to conclude that ANVUR now complies with the ESG 3.1.**

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

## Conclusion:

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

| Standard | Review panel conclusion | Register Committee conclusion      |
|----------|-------------------------|------------------------------------|
| 2.1      | Partial compliance      | Partial compliance                 |
| 2.2      | Substantial compliance  | Compliance                         |
| 2.3      | Substantial compliance  | Compliance                         |
| 2.4      | Partial compliance      | Partial compliance                 |
| 2.5      | Full compliance         | Compliance                         |
| 2.6      | Partial compliance      | Partial compliance                 |
| 2.7      | Substantial compliance  | Partial compliance                 |
| 3.1      | Substantial compliance  | Compliance                         |
| 3.2      | Full compliance         | Compliance                         |
| 3.3      | Substantial compliance  | 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) |

**48. Also after duly considering ANVUR's additional representation, the Register Committee concluded that ANVUR only achieved partial**

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compliance with a number of standards. In particular, ANVUR fails to meet some key requirements of the ESG entirely for some of its activities (e.g. lack of reports). These issues therefore weighed heavily in the Committee's holistic judgement.

49. The Register Committee therefore remained unable to conclude that ANVUR complies substantially with the ESG as a whole and rejected the application.

50. At the same time, on the basis of the documentation available and according to ANVUR's representation, the Register Committee welcomed that several changes are underway and that concrete steps are currently being prepared by ANVUR with a view to achieving (substantial) compliance with the ESG. The Register Committee underlined that it cannot make decisions on the intentions and plans of the agency, but rather on the actual implementation of these steps in practice. While the implementation of these steps in practice is yet to be externally reviewed, the Committee was confident that this could be done in a focused review organised once the steps have been implemented.

51. ANVUR is thus invited to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review (see §3.21 of the Procedures for Applications).

52. ANVUR has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.

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

National Agency for the Evaluation of Universities and Research Institutes  
(ANVUR)

Sandro Momigliano  
Via Ippolito Nievo 35

00153 Rome  
Italy

Brussels, 1 March 2018

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

Application no. A66 of 26/01/2018

Dear Mr Momigliano,

We hereby confirm that the application by ANVUR for (inclusion on the Register/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.

In order to prepare the deliberations of the Register Committee on the eligibility of the application and ANVUR's activities within the scope of the ESG, EQAR contacted ANVUR via telephone on 9/02/2018 to clarify the matters below.

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

- *Initial accreditation of study programmes.*
- *Initial accreditation of higher education institutions.*

Although the activity has been paused since 2013, the activity should be considered as it is likely to be restarted in the future, and thus it would become relevant for the application by ANVUR.

- *Programme accreditation.*

The changes intended to broaden the scope of programme accreditation starting from 2019 should be considered as well.

- *Institutional accreditation.*

In the application form, ANVUR stated that it did not consider the following activities to be within the scope of the ESG.

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:





- *Authorization of PhD Programmes and Post-Graduate Medical Programmes.*
- *Institutional and Programme Accreditation of Arts and Music Institutions.*

We considered the information provided and came to the conclusion that these activities are within the scope of the ESG as they follow predefined processes that involve evaluating or assessing an individual higher education institution or a programme against a set of existing criteria. The activities are substantially concerned with teaching and learning in higher education including relevant links to research and innovation and they use the typical terminology of i.e. “accreditation”<sup>1</sup>.

- PhD Programmes are part of “learning and teaching in higher education” as defined in the ESG, given that PhD qualifications are part of the Qualifications Framework of the European Higher Education Area (QF-EHEA). As Post-Graduate Medical programmes follow a similar procedure and are part of the higher education cycles they are within the scope of the ESG.
- In the accreditation of Arts and Music Institutions and programmes ANVUR considers the “qualifications of professors, quality of teaching, adequate resources”, aspects that are part of the learning and teaching in higher education, and thus within the scope of the ESG. Furthermore, the ESG apply to all types of higher education institutions, including public or private education providers and therefore the ESG also apply to Arts and Music Institutions.

Even though the legal framework does not directly relate those activities to the external quality assurance framework but to a specific set of criteria for the authorisation or of these programmes, these two activities are by their nature external quality assurance within the scope of the ESG. The authorisation of PhD Programmes and Post-Graduate Medical Programmes and the Institutional and Programme Accreditation of Arts and Music Institutions should thus be analysed in the external review of ANVUR.

Please ensure that ANVUR's self-evaluation report covers all the aforementioned activities.

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

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<sup>1</sup>See the Use and Interpretation of the ESG for more information on the activities within the scope of EQAR-registration, p. 3-4  
[https://www.eqar.eu/fileadmin/documents/eqar/official/RC\\_12\\_1\\_UseAndInterpretationOfTheESG\\_v2\\_0.pdf](https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf)

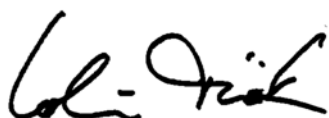
- *Institutional evaluation of quality of research products, notwithstanding its possible relevance to ESG 3.4 Thematic analysis.*
- *Evaluation of administrative activities in Public Universities and Research Institutes*

While these activities are not relevant to your application, it is ANVUR'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 in its capacity of the coordinator of the external review. At the same time we underline that it is ANVUR'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. ANVUR 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)

Chair of the Review Panel

Tue Vinter-Jørgensen

– by email –

Brussels, 14 February 2020

## Application by ANVUR for inclusion on EQAR

Dear Tue,

The National Agency for the Evaluation of Universities and Research Institutes (ANVUR) has made an application for initial inclusion 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 20/06/2019 on which ANVUR'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 ANVUR's application:

We kindly ask you to clarify the following matters to inform the Register Committee's consideration and decision-making:

### ESG 3.1

We understand from the review panel's report that the accreditation of Post-Graduate Medical Programmes is coordinated by the National Observatory on medical formation and that the activity of ANVUR is limited to collecting and annually handling data on the qualifications of scientific staff (EER, p.10-11).

We further note that this activity meets our understanding of an external quality assurance activity i.e. the activity follows predefined processes and criteria, it is concerned with the improvement in the quality of education and it concerns an organisational unit, such as study programmes.

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](mailto:info@eqar.eu)

[www.eqar.eu](http://www.eqar.eu)

VAT BE 0897.690.557

EQAR Founding Members:

While the role of ANVUR is strictly limited to the accreditation of Post-Graduate Programmes in Medicine and Healthcare, we noted that the activity is not separated and distinguishable from ANVUR's regular accreditation of PhDs programmes, an activity that the panel found to be within the scope of the ESG (see ANVUR's website<sup>1</sup>).

Could you please clarify whether the panel has considered how the Post-Graduate Medical Programmes are effectively distinguishable from ANVUR's other activities within its remit i.e. accreditation of PhD programmes? In your answer we would like to kindly refer you to Annex 5 of the EQAR's Policy on the Use and Interpretation of the ESG i.e. clear communication, preventing conflicts of interest.

## ESG 2.1

In its review report the panel noted that ANVUR carries out accreditation of PhD programmes. Under the description of these accreditation activities the panel also noted that ANVUR evaluated a number of dossiers for the accreditation of PhD "courses" (EER, p. 15).

Could you please clarify whether there is a difference between the accreditation of PhD programmes and courses, and if so what are these differences?

## ESG 2.4

We understand from the review panel's report that students are included in panels for institutional accreditation (p.44).

Could you please elaborate more precisely the statement that "students contribute to the experts reports only for standards concerning student issues"? What is the role of students in expert panels and are they involved in evaluation of all ESG standard or just a few of them?

## ESG 2.7

According to the analysis of the review panel ANVUR's formal complaints and appeals procedures are not yet fully developed and clear (i.e. ANVUR has no further information on appeals and complaints procedures other than legal re-examination provisions; there are inconsistencies in the timing for submitting requests for re-examination; ANVUR has no specific appeals committee responsible for ruling on appeals and no specific committee to handle complaints about evaluation process (EER, p. 51-52).

The panel nevertheless considered that it got enough evidence and assurance that procedures are actually in place and known by HEIs and concluded that the agency is compliant with ESG 2.7.

<sup>1</sup><https://www.anvur.it/en/activities/post-graduate-programmes/>

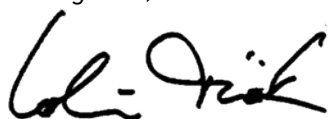
Could you please further elaborate on the evidence supporting the panels' conclusion? Could the panel refer to how many appeals and complaints has ANVUR handled in the past few years, for each activity?

We would be grateful if it was possible for you to respond by 24 October 2019, 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 ANVUR'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:** Laura Beccari (secretary)  
ENQA (coordinator)  
ANVUR

**Further clarification considering the panel's findings regarding the ESG 3.1, 2.1, 2.4 and 2.7 in the review of the Italian National Agency for the Evaluation of Universities and Research Institutes (ANVUR).**

### **ESG 3.1**

#### ***Question from EQAR:***

We understand from the review panel's report that the accreditation of Post-Graduate Medical Programmes is coordinated by the National Observatory on medical formation and that the activity of ANVUR is limited to collecting and annually handling data on the qualifications of scientific staff (EER, p.10-11).

We further note that this activity meets our understanding of an external quality assurance activity i.e. the activity follows predefined processes and criteria, it is concerned with the improvement in the quality of education and it concerns an organisational unit, such as study programmes.

While the role of ANVUR is strictly limited to the accreditation of Post-Graduate Programmes in Medicine and Healthcare, we noted that the activity is not separated and distinguishable from ANVUR's regular accreditation of PhDs programmes, an activity that the panel found to be within the scope of the ESG (see ANVUR's website<sup>1</sup>).

Could you please clarify whether the panel has considered how the Post-Graduate Medical Programmes are effectively distinguishable from ANVUR's other activities within its remit i.e. accreditation of PhD programmes? In your answer we would like to kindly refer you to Annex 5 of the EQAR's Policy on the Use and Interpretation of the ESG i.e. clear communication, preventing conflicts of interest.

#### ***Answer from panel chair and secretary:***

It is our view that ANVUR's activities related to accreditation of Post-Graduate Medical Programmes are clearly and effectively distinguishable from ANVUR's other activities within its remit i.e. accreditation of PhD courses, as ANVUR's mandate and role are de facto differentiated in the different activities. It should further be noticed that Post-Graduate Medical Programmes are not PhD courses, but specialization programmes for those students willing to become practitioners for example in Cardiology, Pediatrics, Dermatology, etc.

We do understand that the current description of these activities at the same page on ANVUR's website under a joint headline might give the impression that these activities are somewhat related. However, ANVUR's tasks in the accreditation of PhD courses and in the accreditation of Post-Graduate Medical Programmes are actually described separately at the page, and this concerns exclusively the English version of the website. We did not experience the same risk of misunderstanding at the time of the review, to which our gathering of evidence was finalized with the site visit to ANVUR in November 2018.

However, in order to avoid misunderstandings, we do believe that ANVUR could and should make a more clear description of its different activities at the website, e.g. with divided paragraphs or even subpages for each activity. ANVUR should also explicitly distinguish, in its communication policies, which activities fall within or outside the scope of the ESG and avoid to use misleading terms when describing its role within

To Karl Dittrich, President, Chair of the Register Committee,  
European Quality Assurance Register for Higher Education (EQAR)

[karl.dittrich@eqar.eu](mailto:karl.dittrich@eqar.eu)

And CC to Colin Tück - Director, EQAR

[colin.tuck@eqar.eu](mailto:colin.tuck@eqar.eu)

Melinda Szabó - Senior Policy Analyst, EQAR

[melinda.szabo@eqar.eu](mailto:melinda.szabo@eqar.eu)

Rome, 20 January 2020

**Object: ANVUR's application of 26/01/2018 for inclusion on the European Quality Assurance Register (EQAR) - additional representation on the matter following Decision of the Register Committee, 05/11/2019.**

Dear President,

I'm writing in response to your letter of 11 November 2019 related to the Deferral of the Application by the National Agency for the Evaluation of Universities and Research Institutes (ANVUR) for Inclusion on the Register.

Please find below our additional comments on the Decision of the Register Committee, 05/11/2019, attached to your letter. Notably, the future activities presented in this document have been included in the *three-year plan of activities (2020-2022)* of the Agency. You can find the Plan on our website (<https://www.anvur.it/attivita/programma-delle-attivita/>) and attached to this document as Annex 1. Particularly, the first step we took was the involvement of all the Agency's staff members to address the recommendations received; a working document was discussed with the staff and shared with the Governing Board in the meeting of 17 December 2019 in order to give advices in the development and revision of procedures that fall under the ESG (see Annex 2). Both these documents will be translated into English by the end of January.

We strongly believe that being registered on EQAR will sustain our efforts for a wider diffusion of quality assurance culture in our National Higher Education system, also enhancing the cooperation with international QA experts. It will increase the opportunities of all Italian Higher Education system to share expertise with Bodies, Institutions and colleagues from all across the EHEA.

Best regards,

Director  
Daniele Livon\*

*\*Digitally signed document according to the legislative decree 82/ 2005*

## ESG 2.1 – Consideration of internal quality assurance

**Panel:** (...) *The panel noted that ANVUR fully integrates Part 1 of the ESG in AVA procedures, but that AFAM and PhD accreditation procedures cover only partial aspects of ESG 1.1.-1.10.*

**EQAR:** (...) *Considering the limited integration of ESG Part 1 in a number of ANVUR's external QA activities, Register Committee concurred with the panel's conclusion that ANVUR complies only partially with ESG 2.1.*

**ANVUR:** According to the Italian law, ANVUR's task in the AFAM and PhD accreditation procedures is limited to specific aspects. This is why we believe that at the moment those procedures could not be fully assessed against ESG and it was probably premature to address these activities in the external review. That is also why the review panel stated clearly that more weight has been given to the core AVA activity, designed taking explicitly into consideration the ESG.

In particular, for the AFAM sector ANVUR is in charge of evaluating *general quality requirements* (checking academic governance functions and activities and the buildings' security certifications requested by law) and *quality requirements specific for the typology of the artistic programmes and for the level of education requested*, such as the artistic quality of the Faculty (teaching, learning and research qualification), the adequacy of scientific and technical equipment for the specific programmes, as well as the possession of economic-financial sustainability requisites. From the beginning ANVUR seeks to develop a quality culture in a sector where internal QA systems are still not fully developed, as appropriate regulation is still missing and a structure of internal QA bodies similar to those of the universities is not yet clearly defined, making its implementation more difficult. ANVUR is playing an active role in reinforcing Quality Assurance systems for AFAM institutions and in proposing methodologies, criteria and parameters that MIUR could make its own in drafting the implementing regulations related to evaluation procedures. These regulations would allow ANVUR to extend its action to a number of important qualitative aspects highlighted in the ESG.

In the meantime, during the accreditation procedures, ANVUR is providing AFAM institutions with the information necessary to gradually implement QA strategies and processes, involving their stakeholders. Additionally, after consulting the Experts Committee representatives of AFAM institutions, in January 2020 the Agency drew up a proposal to revise and simplify the current evaluation procedures to increasingly align with the ESG. Furthermore, in 2020 ANVUR will modify the guidelines for the elaboration of the self-assessment report drafted by the Institutions' internal QA panel, so that they will be fully compliant with the ESG (part 1) and induce Institutions to improve consequently their internal quality systems. In all these activities, the Agency looks to procedures and criteria existing at European level, as well to practices developed by other national or field agencies (e.g. Musique, EQ-Arts).

The PhD accreditation procedure has a similar issue. According to MIUR Decree no. 45/2013, ANVUR is in charge of the initial accreditation of PhD programmes and of the annual verification of the persistence of the compliance to requirements exclusively related to faculty's research activities and published research products. The Agency's review report was the starting point for the collaboration of ANVUR in the drafting of a new ministerial decree. If approved, the accreditation procedures would address many points of ESG part 1 that are not relevant as of today.



In the meantime, in order to push and support the process in that direction, we already started to involve PhD programmes and PhD students in our accreditation procedures. In particular, we took advantage of the programmed institutional visit of two Schools for Advanced studies (IMT of Lucca and SISSA of Trieste) to specifically address the QA in PhD programmes and to involve and interview PhD students. As an example, please find attached (Annex 3) the on site visit agenda (see in particular slots number 10 and 11) and the preliminary evaluation protocol<sup>1</sup> by the panel of experts appointed to visit SISSA of Trieste.

More in general, we are taking advantage of the *ANVUR external review report* and in the last months we intensified the dialogue with the relevant Ministry in order to review the appropriate regulation.

## ESG 2.4 – Peer-review experts

**EQAR:** (...) *the Register Committee noted that if student experts have an equal role in panels there is no ground for paying them less. As the involvement of students in the AVA system is ensured, ANVUR is therefore meeting the standard requirement for this activity.*

*The Register Committee further underlined that the lack of involvement of student experts in ANVUR's remaining activities is concerning and, as such the agency is non-compliant in these cases with the standard.*

*The Register Committee concluded that the standard requirements are not met for all of the agency's activities, and therefore concurred with the panel's conclusion that ANVUR complies only partially with ESG 2.4.*

**ANVUR:** The agency is well aware of this problem and intends to involve expert student evaluators in other evaluation activities in the next future. To begin with, ANVUR is willing to ask for the involvement of Universities' student representatives, and in the next future also of AFAM students, during the preliminary approval of new study programmes to be presented for the initial accreditation by ANVUR. Indeed, new programmes are currently evaluated only by disciplinary experts because the assessment requires a very strong disciplinary background. However, it should be noted that student representatives participate in the internal consultation within the Institution before ANVUR's assessment. In fact, each new study programme should be approved by the Independent Evaluation Unit (Nucleo di Valutazione – NdV) of the Institution before the request to the Ministry for activation. By law, the Independent Evaluation Unit is composed by at least one student representative.

As we underlined in the previous point, ANVUR has started to involve PhD students in the evaluation committee charged with assessing the two Schools for Advanced studies. In the on-site visits to the SISSA of Trieste and to the IMT of Lucca which took place in the months of November and December 2019, two PhD student experts were present in each committee, one of them coming from a foreign country.

Regarding the fees for student experts, in 2016 ANVUR had defined a remuneration in line with the provisions of other European reference QA Agencies in that year. However, considering that student experts have an equal role in panels, starting from 2021 the fees will be reviewed and aligned between faculty and student experts.

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<sup>1</sup> This document is a preliminary report, so is strictly confidential. In a few days, we will send it to the assessed Institution in order to collect comments and counter-arguments.

Additionally, in 2020 ANVUR will promote the involvement of AFAM student representatives within a pilot project aimed to assess the Quality Assurance system of 5 state AFAM institutions.

## ESG 2.6 – Reporting

**EQAR:** (...) *While the panel recognised the work done by ANVUR in assuring the quality of reports, the panel further recommended that ANVUR publishes its full reports from all its external QA activities.*

*The Register Committee underlined the panels' recommendation and emphasised the requirement of the standard, that ANVUR is expected to publish itself the full reports by the experts and that it should make its reports and decisions clear and accessible to the academic community, external partners and other interested individuals.*

*Taking into account the publication of summary reports in case of the AVA system evaluations, the Register Committee was able to concur with the review panel's conclusion that ANVUR complies partially with the standard and it is non-compliant.*

### **ANVUR:**

Since the guidelines for the University accreditation procedures (AVA) expressly indicate that the full panel reports will not be made public, it is not possible to publish them now. This is also due to the fact that expert wrote their full reports considering that the content would be accessible only to the assessed Institution/study programme.

However, following the recommendations by ENQA and EQAR, the new AVA guidelines will address this issue. According to the *three-year plan of activities 2020-2022* (end of page 7), starting from the second round of Institutional accreditations (2021), full reports and final decisions will be published on the Agency website in order to provide clear and accessible information to the academic community and all interested individuals. This will be also valid for the Accreditation of new Universities; the Accreditation of new University programmes; the initial and periodic accreditation of AFAM programmes.

## ESG 2.7 – Complaints and appeals

**Panel:** (...) *the spirit of this standard is followed in practice, although the clarity and transparency of appeals processes could be further improved. The panel received confirmations during its interviews that the procedures are in place and that all involved actors seem to be satisfied with the current system.*

**EQAR:** (...) *The Register Committee underlined the lack of impartial processes for handing appeals as the appeals are considered by same body (the Governing Board) who is making all the decisions related to the accreditation procedures of ANVUR. The Committee further noted the lack of a transparent and formal procedure to handle complaints. Considering the above-mentioned concerns, the Committee was unable to concur with the review panel's judgement of (substantial) compliance and concluded that ANVUR complies only partially with standard 2.7.*

**ANVUR:** The Agency is aware of the need for greater transparency regarding the complaints and appeals procedures (already present) and the different actors involved in the evaluation procedures to challenge the correctness of a procedure or the final decision taken by ANVUR. Please find references for AVA (<https://www.anvur.it/en/activities/ava/>) and AFAM (<https://www.anvur.it/en/activities/afam/>) procedures. To address that, for each other evaluation procedure the following information will be clearly published on the website and will be particularly highlighted in the relevant guidelines:

- what else can be questioned, in addition to the final decision by the Governing Board;
- what is the request for “Riesame” (re-evaluation): who can ask for that, when, what is requested to the applicant, which documents must be provided to ANVUR, what the Agency is obliged to do;
- how the presented requests are managed by the Agency;
- legal provisions for review purposes (for example, how to address a formal request for review at the Ministry).

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

**EQAR:** (...) *The Register Committee further noted that ANVUR is expected to ensure a clear description and presentation of its activities on its website, separating activities that fall within and outside the scope of the ESG or within or outside its remit (see Annex 5: Guiding principles for the separation between agencies’ activities of the Use and Interpretation of the ESG2).*

*Considering the above-mentioned concerns, the Register Committee therefore was unable to concur with the review panel’s conclusion (substantial compliance) and considered that ANVUR only partially complies with standard 3.1.*

**ANVUR:** To address this point, we have included in the webpage dedicated to the ENQA and EQAR accreditation procedures (<https://www.anvur.it/en/agency/enqa-membership/>) the file “Typology of ANVUR’s activities” that specifies, for each ESG standard, the activities that fall (entirely or partially) within the scope of the ESG according to the relevant regulation.

However, a clear description of all different activities undertaken by ANVUR, with subpages for each activity, is presented in the website (both the Italian and English version), together with the relevant regulation.

### Annexes

1. Three-year plan of activities 2020-2022
2. Internal working document ENQA-EQAR
3. On-site visit Agenda and Preliminary evaluation protocol - SISSA of Trieste

ANVUR - National Agency for the Evaluation of Universities and Research Institutes

Daniele Livon, Director

– by email –

Brussels, 19 February 2020

## Application by ANVUR for inclusion on EQAR

Dear Daniele,

We thank you for ANVUR's application for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

The EQAR Register Committee's rapporteurs have been considering the application based on the external review report of 20/06/2019 and the additional representation of 20/01/2020.

In order to inform the Register Committee's consideration and decision-making we kindly ask you to clarify the following matter.

In its deferral decision, the Register Committee pointed to the lack of impartial processes in ANVUR's handling of appeals, as the Governing Board of ANVUR is both the body responsible for taking the decisions related to the accreditation procedures of ANVUR and also the responsible body in handling appeals i.e before the official appeal is submitted to the Ministry.

- Could you please clarify whether ANVUR has taken steps to address the impartiality of the process in handling appeals? If so, what is the new course of action once an appeal is launched with ANVUR?

We would be grateful if it was possible for you to respond by 06/03/2020, 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 ANVUR's application.

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:

Kind regards,



Colin Tück  
(Director)

To Colin Tück - Director,  
European Quality Assurance Register for Higher Education (EQAR)

[colin.tuck@eqar.eu](mailto:colin.tuck@eqar.eu)

And CC to Melinda Szabó - Senior Policy Analyst, EQAR

[melinda.szabo@eqar.eu](mailto:melinda.szabo@eqar.eu)

Rome, 6 March 2020

**Object: ANVUR's application for inclusion on the European Quality Assurance Register (EQAR).**

Dear Colin,

I'm writing you in response to your letter of 19 February 2020, related to the clarification request about ANVUR's handling of appeals.

Steps have been taken by ANVUR to address the impartiality of the process in handling appeals. In fact, following an analysis of the procedures adopted by other Agencies and taking into account the indications by EQAR and the external Review report of ANVUR, the Governing Board of ANVUR approved the establishment of an Appeals Committee, called "*Comitato di Garanzia*", and a procedure for handling appeals that we hope will be considered compliant with ESG 2015.

The Committee is composed by three external members chosen from knowledgeable personalities with high academic expertise and professional experience related to quality, transparency and evaluation procedures. In particular:

- One member (and one substitute member) is selected by ANVUR's Governing Board within the professionals of EQAR and ENQA registered Agencies. He/She is appointed as President of the Committee;
- One member (and one substitute member) is appointed by the Board of Rectors of Italian Universities (*Conferenza dei Rettori delle Università Italiane* - CRUI);
- One member (and one substitute member) is appointed by the National Authority for anti-corruption, transparency and public procurement (ANAC).

Substitute members will be involved in case the Committee member will not be able to exercise his/her function, either due to a conflict of interest or any other reason which prevents him/her from participating in the work of the Committee. Members and substitutes are appointed for 3 years and are renewable only once. In case of an early termination of one member, a new one is appointed for the residual period referred to the replaced member.

The defined appeal procedure is the following.

The review report by the panel of experts (which contains the replies to the counter-arguments of the HEI) and the final Report by ANVUR approved by the Governing Board, are both sent to the assessed HEI,

which, within two weeks of receipt, can submit to ANVUR a reasoned appeal concerning the final evaluation. In this case, the Appeals Committee decides whether the appeal is justified or not.

In the case that it is not considered admissible, the HEI is informed by ANVUR with the motivation expressed by the Appeals Committee and the final Report is sent to the Ministry for the final decision regarding the accreditation.

In the case that the request is deemed admissible, the Appeals Committee meets the panel of experts to deepen the evaluation and discuss a revision taking into account the appeal contents.

The review report by the panel of experts can be maintained the same or modified and is accompanied by a report by the Appeals Committee. The aforementioned documentation is presented to the ANVUR Governing Board which, taking in to account the revised review report by the panel of experts and the evaluation of the Appeals Committee, approves the final Report by ANVUR and sends it to the Ministry. Please note that the formal approval of any evaluation report by ANVUR must be done by the Governing Board, as established by the Italian law (article 8, paragraph 2 of the Presidential Decree n. 76 of 1<sup>st</sup> February, 2010).

The Agency hopes this could help you to clearly inform the Register Committee's consideration and decision-making about ANVUR's application.

Best regards,

Director  
Daniele Livon\*