



UNIBASQ  
Self-Assessment Report  
ENQA Targeted review 2023



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## PART I – BACKGROUND

### 1. Introduction

The Agency for Quality of the Basque University System (Unibasq) is a state-owned body governed by private law attached to the Basque Government’s department responsible for universities. Its objective is the evaluation, accreditation and certification of quality in the area of the Basque University System, while taking the Spanish and international framework into account. Unibasq was created under Article 79 of Act 3/2004 on the Basque University System, although it did not start its activities till 2006. Unibasq has been registered on the European Quality Assurance Register for Higher Education (EQAR) since April 2014 and is applying for renewal of EQAR registration based on a targeted external review against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) coordinated by the European Association for Quality Assurance in Higher Education (ENQA). Unibasq has also been a member of ENQA since 2014 and is applying for renewal of ENQA membership as well. Unibasq is also a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), being aligned with INQAAHE’s Guidelines of Good Practice (GGP)<sup>1</sup>, and the European Consortium for Accreditation in Higher Education (ECA).

This self-assessment report (SAR) aims to show the evolution of Unibasq since its second review in 2018 and its compliance with the ESG. The previous SAR<sup>2</sup> dates from September 2018 while the site-visit of the review panel took place in October 2018. After the positive outcome of the second review in February 2019, Unibasq continued to be full member of ENQA and to be listed on EQAR. As stated in the Terms of Reference (ToR), Unibasq is currently carrying out the following activities within the scope of the ESG:

#### Programme level

- Programme ex-ante accreditation and authorisation in the Basque University System
- Review of study programme modifications
- Accreditation renewal of study programmes
  - in the Basque University System
  - outside the Basque University System
  - of joint study programmes
- Follow-up of study programmes in the Basque University System
- Labels (Dual and International)
- CeQuInt Certification
- Ex-ante evaluation of master programmes in the arts
- Ex-post evaluation of artistic study programmes
- European Approach for QA of Joint Programmes

#### Institutional

- Institutional Accreditation
- AUDIT
- DOCENTIA
- CeQuInt Certification

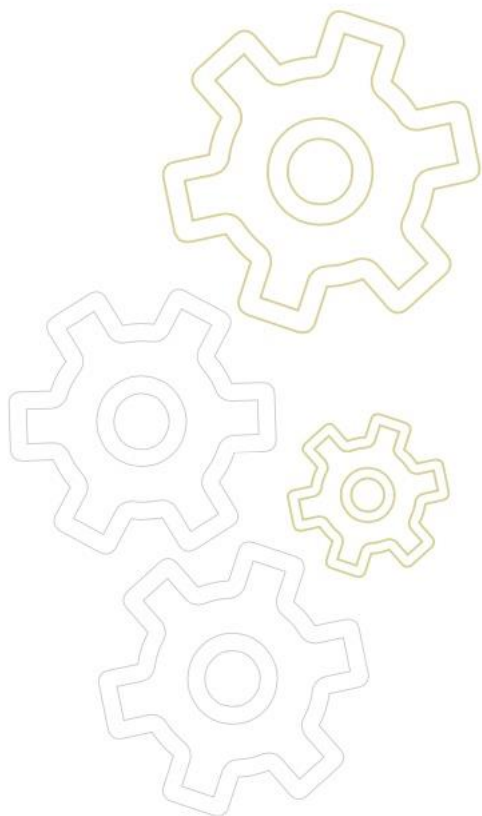
In addition, the following Unibasq activities are outside the scope of the ESG:

- Evaluation of research teams
- Evaluation of research activities
- Review of applications for grants by research groups
- Evaluation of university research institutes

<sup>1</sup> <https://www.inqaahe.org/ggp-aligned-agencies>

<sup>2</sup> [https://www.unibasq.eus/wp-content/uploads/2018/10/Unibasq\\_ENQA\\_SAR\\_Sept2018.pdf](https://www.unibasq.eus/wp-content/uploads/2018/10/Unibasq_ENQA_SAR_Sept2018.pdf)

- Technical reports on institutional agreements
- Evaluation of academic staff (accreditation, performance and research)
- Reports for non-accredited study programmes (UPV/EHU) - Títulos propios (Life-long learning)



## 2. Development stages of the self-assessment report (SAR)

The self-assessment process started with a review of the previous evaluation report and the follow-up report regarding actions taken regarding the areas for development suggested by the ENQA Board and sent to ENQA in February 2021, in parallel with a compilation of information about Unibasq's activities since 2018 and a careful reading of the ENQA and EQAR guides. In order to have a clearer idea of what a Targeted review meant Unibasq attended the ENQA Agency Reviews' seminar for agencies planning to undergo a review in 2022-2023 (31 May – 1 June 2022, Cologne, Germany). After that there was an initial reflection with Unibasq Direction to decide whether to undergo a Targeted review and to decide on the standard/s for enhancement followed by a communication of the decision to Unibasq Governing Board and Advisory Board.

In order to consider all different views expressed during the development of the SAR, Unibasq involved its entire operational staff, with fluid communication thanks to several coordination meetings, and set up a specific working group with the following composition: Unibasq's Internationalisation and projects manager and representatives from the agency's Advisory Board, Institutional Accreditation Committee and Students' Consultative Committee.

The draft document was discussed in the working group during May and June 2023. It was presented afterwards to the Advisory and Governing Boards.

As agreed in the tripartite Terms of Reference (ToR) with ENQA and EQAR, the scope of this self-assessment process focuses mainly on Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

- ESG 2.6: considering the publication of all and full reports in all activities, in particular negative ex-ante accreditation reports as well as from Unibasq's new activities;
- ESG 2.7: reviewing the composition and independence of Unibasq's appeals committee as well as Unibasq processes and procedure for handling complaints;
- ESG 3.1: addressing how Unibasq ensures a clear distinction and presentation of its quality assurance activities outside the scope of the ESG in particular considering the activity Titulos propios, as well as the new activities outside the scope of the ESG;
- In addition, it includes the description of how Unibasq meets the Standards 2.1 to 2.7 for the following new/changed activities:
  - Accreditation renewal of study programmes outside the Basque University System (new)
  - Labels (new)
    - Dual
    - International
  - CeQInt Certification (new)
  - Ex-post evaluation of artistic study programmes (new)
- Institutional accreditation, covering those areas where changes were made and at least the following in detail:
  - ESG 2.2: how the agency ensures that the revised methodology is fit for purpose and how were stakeholders involved in the development of the processes and criteria;
  - ESG 2.4: training of the review panels for this activity;
  - ESG 2.6: details about the stage when reports are published;
- ESG 2.1 Consideration of internal quality assurance (in all activities);
- Selected enhancement area: ESG 3.4 Thematic analysis

Any improvements made since the last review regarding the areas for development suggested by ENQA Board in its Reconfirmation of membership of Unibasq in ENQA<sup>3</sup> (February 2019) will be included under the description of the specific standard if there have been additional changes since the submission of the Follow-up report in February 2021<sup>4</sup>.

<sup>3</sup> <https://www.unibasq.eus/wp-content/uploads/2019/03/Letter-ENQA-to-Unibasq-1.pdf>

<sup>4</sup> [https://www.unibasq.eus/wp-content/uploads/2021/05/Unibasq\\_follow-up-report-Feb\\_2021.pdf](https://www.unibasq.eus/wp-content/uploads/2021/05/Unibasq_follow-up-report-Feb_2021.pdf)

### 3. Changes in the Basque Higher Education System since the last full review

The last full review was done based on the information gathered in the SAR (till June 2018) and the site visit to Unibasq (October 2018). Since then, several changes have happened in the Basque Higher Education System, a new university has been created and new regulations and adaptations are taking place in the Spanish higher education and quality assurance system. Regarding the agency's structure the staff is mainly the same with the consolidation of two of the temporary positions and the appointment of a new Director in November 2019. As previously mentioned, there are also new external quality assurance activities, some of them already introduced in the SAR 2018<sup>5</sup>.

#### 3.1. Basque University System in 2023

The following table gives an overview of the current composition of the Basque University System. If compared with the data from 2018, the main changes are the creation of the new university EUNEIZ<sup>6</sup>, a private university integrated into the Basque University System which, from the academic year 2022/2023, will gradually begin to offer study programmes specialising in new technologies, sport, and health. Therefore, the current Basque University System consists of 4 universities (one public and three private). A total of 120 bachelor's programmes, 168 master's programmes and 78 doctoral programmes are offered to around 61000 students. The system has almost 6000 academic staff and 2500 administration and services staff<sup>7</sup>.

Table 1. Basque University System overview.

University (Year of creation)	Type of institution	Faculties or Schools	Bachelor programmes	Master programmes	Doctorate programmes	Academic staff	Administration and Services staff
UPV/EHU (1980)	Public	20 (4)	69	107	66	4505	1883
Deusto University (1886)	Private, not-for profit Church	6 (2)	29	42	8	735	555
Mondragon Unibertsitatea (1997)	Private, not-for profit cooperative	4	18	19	4	615	164
Euneiz (2022)	Private, for profit	2	4	--	--	--	--

Data source: University Information Integrated System (SIIU) 2022-2023 data regarding institutions and study programmes – SIU 2021-2022 data regarding staff. The numbers between brackets stand for affiliated university centres.

#### 3.2. Changes in the agency

In the last five years, there have been no changes in the structure of the governing or technical bodies neither in the operational structure of Unibasq. The information regarding the composition and functions of each of the bodies is available on Unibasq website<sup>8</sup>.

The most significant changes since the last review are:

- The appointment of a new director on 1 November 2019, due to the end of term of the previous director.
- The adoption of the Strategic Plan 2020-2023<sup>9</sup>.

<sup>5</sup> [https://www.unibasq.eus/wp-content/uploads/2018/10/Unibasq\\_ENQA\\_SAR\\_Sept2018.pdf](https://www.unibasq.eus/wp-content/uploads/2018/10/Unibasq_ENQA_SAR_Sept2018.pdf)

<sup>6</sup> <https://www.euneiz.com/en/>

<sup>7</sup> <https://observatorio.unibasq.eus/en/bus-qualifications/>

<sup>8</sup> <https://www.unibasq.eus/en/internal-organisation/>

<sup>9</sup> [https://www.unibasq.eus/wp-content/uploads/2023/05/Unibasq\\_Strategic\\_plan\\_2020-2023.pdf](https://www.unibasq.eus/wp-content/uploads/2023/05/Unibasq_Strategic_plan_2020-2023.pdf)

- Adaptation of activities to the effects of the Covid-19 pandemic. Just before the lockdown in March 2020, Unibasq has just finished uploading all its documents from physical servers to a SharePoint as part of the change to Microsoft Office 365. This facilitated working from home and the use of the available online communication platforms made possible to continue with the external reviews even if not face-to-face. In addition, in order to support the universities of the Basque Country, a working group with representatives from the universities – UPV/EHU, University of Deusto and Mondragon Unibertsitatea –, the Basque Government (Universities vice minister and director) and Unibasq was created and met every week to share the concerns of everyone involved and to look into joint solutions to the challenges we all were facing in that moment. Moreover, Unibasq gathered some international initiatives and resources from quality assurance agencies and some other HE organisations in the face of the Covid-19 pandemic and the need to provide emergency remote teaching<sup>10</sup>. Additionally, the Spanish network of Quality Assurance Agencies (REACU) held periodic online meetings to coordinate joint approaches to quality assurance in this challenging situation.
- Consolidation of staff. Eventually in 2023 the two temporary technical positions will be consolidated, and the new permanent contracts should be signed soon.
- Redesign and update of the Observatory of the Basque University System – Unibasq-Behatokia<sup>11</sup>. The aim of the Observatory of the Basque University System – Unibasq-Behatokia is to offer a global and detailed vision of the activity of the Basque University System. On the one hand, Unibasq-Behatokia collects aggregate information on each university and the Basque University System (SUV) as a whole. On the other hand, and in a much more detailed way, it collects a series of relevant data and documents for each of the study programmes taught in the SUV. Among the data that Unibasq-Behatokia makes available to the public are the quantitative indicators about student access and enrolment, performance, and employment rates. This is work in progress as the first step was to redesign the information given for each of the study programmes, reducing the number of indicators provided to the most relevant ones and with the same source of data for all the programmes.

### 3.3. Changes in the legislation

Since the last review there have been several legislative changes<sup>12</sup>, which, even if they don't affect the type of activities carried out by Unibasq, imply some adaptations to the already in place procedures. Unibasq has been working together with the agencies in the Spanish Network of Quality Assurance Agencies (REACU) to analyse the impact of these changes in the regulatory framework on the Agency's procedures. Some common documents have already been agreed as REACU documents and are already available on Unibasq website (under the Documentation section of each external quality assurance activity affected, for instance, ex-ante accreditation of study programmes<sup>13</sup>). The changes will mainly affect the specific evaluation guides of each of the agencies (which are still under development), and the online platforms used.

### 3.4. New external quality assurance activities

In the SAR 2018 some of the new external quality assurance activities were already introduced, although there were no completed procedures yet. For instance, the procedure for the Accreditation renewal of study programmes outside the Basque University System, whose first pilot review was done in the academic year 2018-2019 or the Label regarding Dual education which was about to start after the 2018 review. Also in 2018 the first stage of institutional

<sup>10</sup> [https://www.unibasq.eus/wp-content/uploads/2020/05/Covid-19\\_iniciativas\\_educacio%CC%81n\\_superior\\_13\\_Mayo\\_2020.pdf](https://www.unibasq.eus/wp-content/uploads/2020/05/Covid-19_iniciativas_educacio%CC%81n_superior_13_Mayo_2020.pdf)

<sup>11</sup> <https://observatorio.unibasq.eus/en/>

<sup>12</sup> Organic Law 2/2023 of 22 March on the University System.

Decree 90/2022, of 19 July, which regulates the procedure for the preparation of the report on the academic and social need and viability of the implementation of official university study programmes.

Royal Decree 822/2021, of 28 September, which establishes the organisation of university programmes and the procedure for quality assurance.

Royal Decree 640/2021, of 28 July, the creation, recognition and authorisation of universities and university centres, and institutional accreditation of university centres.

<sup>13</sup> [https://www.unibasq.eus/wp-content/uploads/2022/02/2022-01-13\\_REACU-ProtocoloEvaluacion-Verificacion.pdf](https://www.unibasq.eus/wp-content/uploads/2022/02/2022-01-13_REACU-ProtocoloEvaluacion-Verificacion.pdf)

accreditation of university centres (schools and faculties) began as the Royal Decree 420/2015 of May 29th, about creation, recognition, authorisation and verification of universities and university centres, established that the university faculties or schools which had their Internal Quality Assurance System (IQAS) implementation certified and with at least 50% of their Bachelor's and 50% of their Master's programmes accredited could ask for institutional accreditation. The procedure to be followed was described in a Resolution of 7th of March of 2018 of the Universities General Secretariat of Spain, updated by a Resolution of 3rd of March of 2022. From that moment on, the universities in Spain could request this institutional accreditation for their centres and this first stage was almost automatic if the two conditions mentioned above are met. Once the institutional accreditation was awarded, all study programmes under the scope of faculty or school were deemed to be accredited from the same date with a validity of five years, which was later extended to six years by the Royal Decree 640/2021 of 27th July, which also included the doctoral programmes under the scope of institutional accreditation. In 2024 some university centres in the Basque Country need to renew their institutional accreditation and that is why Unibasq is running a pilot for the reaccreditation of university centres in 2023. All the new activities under the scope of the ESG will be further described here:

## Compulsory EQA for HEIs

### **Institutional Accreditation**

As a change in an existing external QA activity, the second phase of the institutional accreditation procedure has just started in 2023. Until now, and as established by Spanish regulations, Spanish university schools and faculties could request institutional accreditation once they had their IQAS's implementation certified and had at least 50% of their study programmes (bachelor, master and doctoral level) with their accreditation renewed. Unibasq has developed a guide for the renewal of institutional accreditation and will run a pilot procedure during 2023.

### **Ex-post evaluation of artistic study programmes**

The aim of this evaluation procedure is the evaluation of Higher Education Artistic Study programmes in the Basque Country. In the first stage, Unibasq's evaluation report is submitted to the Spanish Ministry in charge of higher education for the official approval of the programme. It is a desk-based review very similar to the ex-ante accreditation procedure for official study programmes and the following dimensions are reviewed: description, justification, skills, students' access and admission, study plan, academic staff, resources and services, expected outcomes and schedule. This was the activity listed in EQAR. In 2021, Unibasq made the first review to renew the accreditation of one of those programmes. After 6 years the programmes need to renew their accreditation following the criteria and procedure for the renewal of accreditation of study programmes, which includes a site-visit. One master programme has already renewed its accreditation following this procedure.

## Voluntary EQA for HEIs

### **Labels**

The Unibasq Quality Labels are voluntary acknowledgements granted by the agency at the request of the Universities in the Basque University System (SUV).

The purpose of the recognitions or Quality Labels awarded by Unibasq is to support the universities of the SUV in the improvement of a series of specific aspects relevant to their study programmes. The main objective of these awards is therefore to promote and stimulate the efforts of the SUV universities to improve their study programmes, with the secondary objective of improving the visibility of these efforts in society.

The Unibasq Quality Labels focus, in particular, on those aspects of the SUV universities' study programmes on which the university policy of the Autonomous Region of the Basque Country establishes its focus of attention and improvement. Among other issues the Unibasq Quality Labels programme is related to the Order of 27 July 2018,



from the Basque Government's Regional Minister of Education, on the categorisation of official university education at Bachelor's and Master's level.

The quality labels deal, on the one hand, with learning acquired in a work environment (dual label) and, on the other hand, with the internationalisation of an institution. These reviews are additional to the regular ex-ante accreditation procedure.

- In the **Dual Label** the recognition of dual learning, learning methodology that combines learning at university and at a working environment, is made. The objective of this programme is to evaluate already accredited Bachelor's and Master's study programmes to obtain recognition of "Dual Learning".  
The aforesaid recognition may extend throughout the whole study programme, or part of it. In the first version of the procedure and the project, its main function was to turn Unibasq into a catalyst agent for the promotion of dual university education projects. The role of Unibasq has been important because with its protocol, standards and guidelines defined by taking as a reference the experience of certain university systems of the EHEA, it was able to gradually shape a Spanish definition of dual education. This is proven by the fact that the article of the Royal Decree 822/2021 which currently regulates dual education in Spain is based on the Unibasq procedure. The project, as will be seen in the results, was very successful. In a second phase, although the label still aims to promote dual university education in the system, it is awarded to projects with a certain degree of deployment.
- The aim of the internationalisation label is to evaluate and recognize the internationalisation level of study programmes considering several aspects related to internationalisation such as: internationalisation strategy, international mobility, satisfaction with these mobility activities, education offered in different languages and capability of the academic staff to offer the programme in different languages.

The study programmes can apply for this recognition and the review follows the ex-ante accreditation procedure with some specific aspects to be considered for each of the labels (dual or internationalisation project developed by the study programme), then there is a follow-up during the accreditation renewal of the programmes (ex-post accreditation). For programmes under the scope of an institutionally accredited university centre, the labels awarded will be monitored during the institutional accreditation renewal.

### Accreditation renewal of study programmes outside the Basque University System<sup>14</sup>

Act 13/2012 of 28 June 2012 governing Unibasq – the Agency for the Quality of the Basque University System, establishes in its article 2 that Unibasq may also carry out evaluation, accreditation and certification activities at HEIs outside the Basque Autonomous Region on the basis of prior agreements signed with other regional, national or foreign agencies, universities or educational authorities.

As part of the commitments taken in its strategic plan 2016-2019<sup>15</sup> regarding internationalisation, Unibasq has taken up a contact with some universities in Latin-America that have signed agreements with a university in the Basque Country, to support the recognition among these universities. Due to previous visits/meeting and contacts of Unibasq's Director with representatives of Latin-American universities (Chile, Guatemala, Dominican Republic...), an agreement, that lead to the pilot external review of the Law programme of the University of Aconcagua (Chile) by the end of 2018, was signed.

The procedure is the one used in the accreditation renewal of Basque study programmes, including a site visit and with the same criteria, although the specific requirements of Basque and Spanish regulations are not taken into account, but considering the specific context of higher education system in Chile.

The second initiative was done in the framework of an agreement signed between Unibasq and the Chilean accreditation agency *AccreditAcción*<sup>16</sup> to provide a joint accreditation procedure. After an analysis of both frameworks, in 2022 a pilot joint accreditation procedure was carried out.

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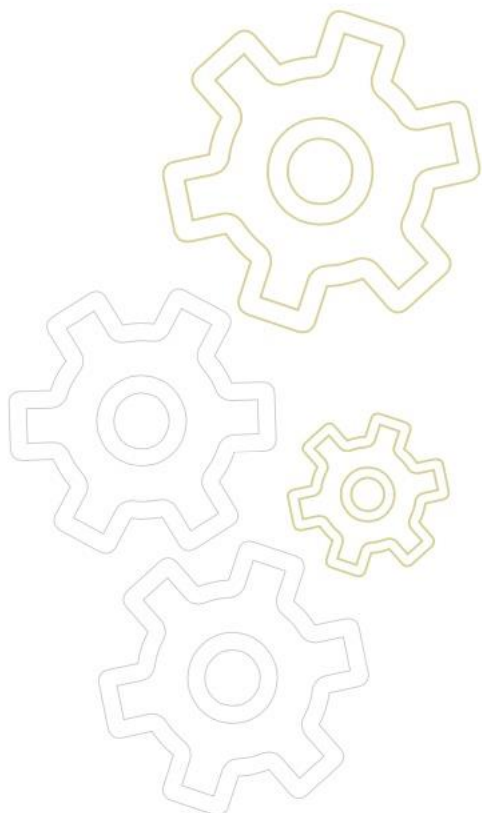
<sup>14</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

<sup>15</sup> [https://www.unibasq.eus/wp-content/uploads/2017/11/Unibasq\\_Strategic\\_Plan\\_2016-2019.pdf](https://www.unibasq.eus/wp-content/uploads/2017/11/Unibasq_Strategic_Plan_2016-2019.pdf)

<sup>16</sup> <https://acreditacion.cl/>

### CeQInt Certification<sup>17</sup>

As member of the European Consortium for Accreditation in Higher Education (ECA), Unibasq can coordinate reviews following the CeQInt methodology which can be used to assess the quality of internationalisation at programme or at institutional level. A successful assessment leads to the award by ECA of the Certificate for Quality in Internationalisation. This Certificate confirms that a programme or an institution has successfully incorporated an international and intercultural dimension into the purpose, function and delivery of its education.



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<sup>17</sup> <https://ceqint.eu/>

## PART II – FOCUS AREAS

### 4. Focus areas of Part 3 of the ESG

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

**ENQA recommendation:** *Unibasq is recommended to clearly distinguish its ESG-based evaluation procedures and its consultancy activities.*

**EQAR flag:** *The Register Committee sought and received clarification regarding the evaluation of “títulos propios”. Unibasq clarified that these activities were not listed in its application for renewal of registration because Unibasq “realized that it was more a consultancy activity as Unibasq just provides an external expert report” and thus did not consider them as activities within the scope of ESG. In support of its classification, Unibasq stated that it acted only as a subcontractor to the UPV/EHU and had no own responsibility for the review process or the outcomes. The Register Committee also noted that Unibasq does not provide “accreditation” of “títulos propios”, contrary to what was published by UPV/EHU. Unibasq, however, stated on its website that it “will evaluate and certificate” those degrees. Unibasq further noted that the misunderstandings were caused by a discrepancy between the internal regulations of the UPV/EHU and the public information on their website, stating that some programmes are accredited by Unibasq. Having considered Unibasq’s response, the Register Committee accepted that the evaluation of “títulos propios” may be classified as consultancy service performed by Unibasq to UPV/EHU. The Register Committee further considered how Unibasq ensured a clear distinction from its external quality assurance activities within the scope of the ESG (see EQAR Policy on the Use and Interpretation of the ESG, standard 3.1 and Annex 5). The Committee noted that such a clear distinction was particularly crucial in this case, given that the terminology and the characteristic of the activity caused an actual risk of confusion with ESG activities. The Register Committee concluded that the presentation on Unibasq’s website was misleading and did not ensure clarity as to the different nature of these evaluations; it thus considered that Unibasq did not comply with the standard. In its additional representation, Unibasq stated that it held specific meetings with the UPV/EHU, sent a formal letter regarding this issue and elaborated a new agreement with the UPV/EHU, which was approved by Unibasq’s Governing Council. As stated in the agreement, the evaluations of “Títulos propios” are consultancy activities which cannot be represented as “Accredited, validated or reviewed by Unibasq”. In addition, Unibasq removed from its website the information that could have been misleading about “títulos propios” previously. The Committee, however, noted that UPV/EHU continues to refer to an “external report” by Unibasq in its advertisement of “títulos propios”. The Register Committee welcomed Unibasq’s steps that were taken to clarify the status of this activity and to avoid further misinterpretations. At the same time, the Register Committee considered that it cannot be fully determined at this stage whether the new communication is fully clear to all stakeholders and avoids any misrepresentation; this should thus be analysed in the next external review of Unibasq. The Register Committee remained unable to concur with the panel’s conclusion of compliance but concluded that Unibasq now complies partially with standard 3.1.*

After the last review the ENQA Board suggested an area for development and the EQAR Register Committee concluded that Unibasq only complied partially with standard 3.1. The review panel came to that conclusion as some of the interviewees didn’t seem to make a clear distinction of the Unibasq external quality assurance activities under and outside the scope of the ESG. In addition, there wasn’t a clear distinction on the website as some activities outside the scope of the ESG like the evaluation of “Títulos propios” (life-long learning offer of the UPV/EHU) was published together with the evaluation of the official accredited study programmes. Moreover, the UPV/EHU, which offers these life-long learning programmes, published incorrectly that these programmes were accredited by Unibasq. This all led to the conclusion of partial compliance on this standard after the last review. This aspect was discussed with EQAR on the additional representation and the letter sent with additional information after the deferral of decision<sup>18</sup>.

As explained in the Follow-up report 2021<sup>19</sup> sent to ENQA, which, summarizes all the initiatives taken since the last review in order to solve this issue, to avoid further misleading situations, Unibasq held specific meetings with the UPV/EHU and sent a formal letter regarding this issue and the information that was available on the webpage of the university was corrected and it doesn’t state anymore that the “Títulos propios” are accredited by Unibasq. In addition, a new agreement was signed with the UPV/EHU stating the conditions on any information published regarding the reports made for the “Títulos propios”. This new agreement was approved by Unibasq’s Governing Board at its meeting of the 15th of July 2019, where the topic was presented and where the presidents of the universities of the Basque University System had a sit. Moreover, currently there is no information on Unibasq webpage that can give misleading information regarding this issue as the information regarding “Títulos propios” was

<sup>18</sup> [https://backend.deqar.eu/reports/EQAR/2019-11-A65\\_Application\\_Decision\\_Unibasq.pdf](https://backend.deqar.eu/reports/EQAR/2019-11-A65_Application_Decision_Unibasq.pdf)

<sup>19</sup> [https://www.unibasq.eus/wp-content/uploads/2021/05/Unibasq\\_follow-up-report-Feb\\_2021.pdf](https://www.unibasq.eus/wp-content/uploads/2021/05/Unibasq_follow-up-report-Feb_2021.pdf)

erased from the section related to study programmes and the different review procedures to avoid misunderstandings. Moreover, in the past Unibasq used to publish all the activities performed to be accountable to society. Nowadays, on Unibasq webpage<sup>20</sup> there is no information which could be misleading regarding the activities outside the scope of the ESG under the sections “University degrees” or “Institutional”. In addition, we pay specific attention to the information we give to the universities and our experts regarding the activities under or outside the scope of the ESG and what this implies.

Unibasq activities are established in Act 13/2012 and in Unibasq’s statutes which state that the Agency will perform the activities of evaluation, certification and accreditation of study programmes, institutions and teaching staff.

After the previous review and considering the recommendations made, in 2020, the Governing Board approved the Strategic Plan of Unibasq (2020-2023)<sup>6</sup>, which includes 3 strategic lines further developed in strategic objectives and action lines:

1. Services: Evaluation, Accreditation, Counselling and Foresight
2. Projection and Relationship with the Environment
3. Management, Resources and People

This all is materialized in the Unibasq’s sequence of annual management plans<sup>21</sup>.

Stakeholders are involved in the different bodies of the Agency (Governing Board, Advisory Board, Evaluation Committees, and Students’ Consultative Committee). According to Unibasq Act the participation of students is guaranteed in institutional and programme evaluation committees, but they are not allowed to take part in the evaluation and accreditation of individual teachers/researchers or administrative/service staff. Professionals with a proven track record in the knowledge area to be evaluated are involved as participants in the Committees for the evaluation of study programmes, and Quality Assurance experts are part of the Institutional Accreditation and Quality Systems Certification Committee.



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<sup>20</sup> <https://www.unibasq.eus/en/>

<sup>21</sup> <https://www.unibasq.eus/en/transparency-portal/management-management-plan/>

The following table summarizes the procedures implemented for each EQA activity per year for the last five years since the last full review. It includes all the procedures done in 2018, as in the previous SAR the information was only available till June 2018, and the information available till June 2023 regarding the procedures already finished or planned for 2023.

Table 2. Unibasq's procedures for each EQA activity (2018-2023).

		Activity	2018	2019	2020	2021	2022	2023 <sup>22</sup>
Activities under the scope of the ESG	Study programmes	Ex-ante accreditation	5	13	11	2	11	15
		Follow-up	66	93	271	86	--	2 <sup>23</sup>
		Modification	7	10	12	10	62	21
		Ex-post accreditation	15	57	20	46	65	1
		Ex-post accreditation abroad	--	1	--	--	1	--
		European Approach	--	1	--	--	--	2
		Label dual	26	13	8	6	--	--
		Label internationalisation	--	18	10	5	--	4
		Ex-ante Arts	4	--	--	--	--	--
		Ex-post Arts	--	--	--	1	--	--
	Institutions	CeQuint (Institutional)	--	--	--	1	--	1
		AUDIT	3	5	4	1	5	2
		DOCENTIA	3	1	2	1	2	1
		Institutional accreditation	13	3	4	2	2	2
		Renewal of institutional accreditation	--	--	--	--	--	1-4 <sup>24</sup>
Activities outside the scope of the ESG	Títulos propios (life-long learning UPV/EHU)	23	21	12	12	12	4	
Academic staff evaluation	Academic staff accreditation	734	719	691	598	705	714	
	Academic performance	--	287	420	410	968	876	
	Research activity (sexenios)	156	143	189	170	169	228	
	Research activity (ikertramos)	84	115	46	53	43	33	
	Research activity (Iker 22)	22	5	1	4	2	1	
Research	Research institutes	--	1	--	--	--	--	
	Research projects/teams	--	--	37	34	242	--	

<sup>22</sup> Till May 2023 included.

<sup>23</sup> Monitoring visits to Faculties of Health Sciences of the University of Deusto and EUNEIZ.

<sup>24</sup> One visit done and 3 more expected in 2023.

## Critical reflection

As can be seen from the data gathered on table 2, Unibasq develops very different kind of activities, including the review of academic staff for diverse purposes. It is relevant to say that the number of ex-post accreditation of study programmes is reducing as most of the centres of the Basque University System have already got their initial institutional accreditation and there is no need for new renewal of accreditation of individual programmes while the centre maintains its institutional accreditation. There is a clear shift from programme to institutional accreditation as this was a bet of all the whole Basque University System and currently 26 out of 38 Basque university centres are institutionally accredited and will undergo the renewal of their institutional accreditation in the next years.

In parallel to the reflection to draft this SAR, Unibasq is starting the reflection for its new strategic plan 2024-2027 and one of the aspects to be included will be to design a new webpage to improve the information offered to its stakeholders considering the need to further enhance the clarity of the information regarding the external quality assurance activities under the scope of the ESG. Even if after the last review and in preparation of the new one, there were some updates made, Unibasq considers that some reflection is still needed to make the information even more clear and accessible for all stakeholders.



## 5. Focus areas of Part 2 of the ESG

### 5.1 ESG Standard 2.1 Consideration of internal quality assurance (all activities)

**ENQA recommendation:** *Unibasq is recommended to integrate the concept of student-centred learning as a core element in the agency's work and in its procedures (ESG 1.3).*

Regarding ENQA's recommendation, as explained in the Follow-up report 2021, *"the concept of student-centred learning is implicit in all the programme reviews, even if the specific term is not explicit in all the documents "In the ex-ante evaluation of Bachelor's and Master's degrees, these aspects are reviewed as part of the criteria dealing with the planning of teaching activities and their expected outcomes. In the ex-ante evaluation of Doctoral programmes, they are reviewed when assessing the educational activities, the programme organisation and achievement of the expected learning outcomes. In the follow-up and accreditation procedures, they are part of the review of delivery and performance indicators, and achievement of learning outcomes (respectively). As the case of AUDIT, this aspect is reviewed when assessing how the centre provides student-centred study programmes. In the case of DOCENTIA, it is part of the planning of teaching activities and their expected outcomes."*

*Nevertheless, in the development of our new institutional accreditation procedure the focus is clearly on the concept of student-centred learning building on the lessons learnt from the INNOMETH project (see section on Thematic analysis – Recommendation 2).*

*In the ex-ante evaluation of Bachelor's and Master's degrees, these aspects are reviewed as part of the criteria dealing with the planning of teaching activities and their expected outcomes. In the ex-ante evaluation of Doctoral programmes, they are reviewed when assessing the educational activities, the programme organisation and achievement of the expected learning outcomes. In the follow-up and accreditation procedures, they are part of the review of delivery and performance indicators, and achievement of learning outcomes (respectively). As the case of AUDIT, this aspect is reviewed when assessing how the centre provides student-centred study programmes. In the case of DOCENTIA, it is part of the planning of teaching activities and their expected outcomes."* Building on the explanations given in the follow-up report, in the development of new guides the concept of student centred learning is more visible and it can be clearly seen in the Criterion 3 "Deployment and implementation of the centre's student-centres academic project" for the renewal of institutional accreditation in the "Guide to standards and criteria for the renewal of Institutional Accreditation of University Centres"<sup>25</sup>. In addition, one of the suggestions from the survey sent to our stakeholders was to have two interview sessions with students, once at the beginning of the site visit and another one at the end after having met all the other stakeholders to contrast some of the findings made. This is an idea that will be discussed with our Advisory Board.

All external quality assurance procedures used by Unibasq take into account the effectiveness of HEIs' internal quality assurance processes described in Part 1 of the ESG. Annex 1 presents a table of correspondence of Unibasq EQAs under the scope of the ESG and Part 1 of the ESG. In addition, the following tables describe in detail the correspondence of the new Unibasq EQA's and Part 1 of the ESG, the first one regarding programme level reviews and the second one focusing on institutional level reviews. Unibasq's evaluation and analysis functions are planned and performed in order to help HEIs meet the requirements for internal quality assurance. Unibasq believes that if institutions improve their internal management processes, this will enhance the whole Basque University System, helping further spreading of the quality culture already developed. The specific information regarding the different criteria/guidelines used in the Unibasq review procedures can be seen in the Documentation section of each of the procedures on the webpage.

<sup>25</sup> [https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq\\_Guide\\_Institutional\\_Accreditation\\_nov-2022-1.pdf](https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq_Guide_Institutional_Accreditation_nov-2022-1.pdf)

Table 3. Matrix of correspondence of Unibasq's criteria in the new programme evaluation procedures and ESG Part 1.

ESG Part 1	Ex-post evaluation of artistic study programmes	Labels – Dual & International	Accreditation renewal of study programmes (outside the Basque University System)	CeQuint certificate programme
1. Policy for quality assurance	3. Quality Assurance System	8. Quality Management System	3. Quality Assurance System	Intended internationalisation <ul style="list-style-type: none"> <li>• Supported goals</li> <li>• Verifiable objectives</li> <li>• Impact on education</li> </ul>
2. Design and approval of programmes	1. Organisation and development	2. Justification & 5. Study programme planning	1. Organisation and development	International and intercultural learning <ul style="list-style-type: none"> <li>• Intended learning outcomes</li> <li>Teaching and Learning</li> <li>• Curriculum</li> </ul>
3. Student-centred learning, teaching and assessment	1. Organisation and development & 6. Outcomes	5. Study programme planning	1. Organisation and development & 6. Outcomes	Teaching and Learning <ul style="list-style-type: none"> <li>• Curriculum</li> <li>• Teaching methods</li> <li>• Learning environment</li> <li>International and intercultural learning</li> <li>• Student assessment</li> </ul>
4. Student admission, progression, recognition and certification	1.4 & 1.5 Admission & Academic rules	4. Access and admission	1.4 & 1.5 Admission & Academic rules	Students <ul style="list-style-type: none"> <li>• Composition</li> <li>• Experience</li> <li>• Services</li> <li>International and intercultural learning</li> <li>• Graduate achievement</li> </ul>
5. Teaching staff	4. Academic staff	6. Academic staff	4. Academic staff	Staff <ul style="list-style-type: none"> <li>• Composition</li> <li>• Experience</li> <li>• Services</li> </ul>
6. Learning resources and student support	5. Support staff, material resources and services	7. Material resources and services	5. Support staff, material resources and services	Teaching and Learning <ul style="list-style-type: none"> <li>• Learning environment</li> <li>Students</li> <li>• Services</li> <li>Staff</li> <li>• Services</li> </ul>
7. Information management	3. Quality Assurance System & 7. Satisfaction and performance indicators	8. Quality Management System	3. Quality Assurance System & 7. Satisfaction and performance indicators	The framework states the following: "The assessment of internationalisation is voluntary, and
8. Public information	2. Public information	4. Access and admission	2. Public information	it does not substitute existing external quality assurance or accreditation procedures. An assessment of internationalisation may be combined with regular external quality assurance procedures, but it is a supplementary and improvement-oriented service. This means that the
9. On-going monitoring and periodic review of programmes	1. Organisation and development & 3. Quality Assurance System	8. Quality Management System	1. Organisation and development & 3. Quality Assurance System	Certificate for Quality in Internationalisation can only be awarded to programmes and institutions that have been externally quality assured, though not necessarily at the same level.", that is why it doesn't apply these specific criteria, which are assessed in the regular accreditation procedures for study programmes
10. Cyclical external quality assurance	Every 6 years	Every 6 years	Every 5 years	Every 5 years



Table 4. Matrix of correspondence of Unibasq’s criteria in the new institutional level evaluation procedures and ESG Part 1.

ESG Part 1	Institutional accreditation (renewal)	CeQint certificate Institutional
1. Policy for quality assurance	Definition of strategy and quality policy	Intended internationalisation • Supported goals • Verifiable objectives • Impact on education Action plans • Fitness for purpose • Dimensions (“International and intercultural learning outcomes”, “teaching, learning and research”, “staff” and “students”). • Support Governance • Responsibilities • Effectiveness • Responsiveness Enhancement • Measures for enhancement • Enhancing education • Stakeholders involvement
2. Design and approval of programmes	Management of the design of the centre’s academic project	Intended internationalisation • Impact on education Action plans • Dimensions (“International and intercultural learning outcomes”, “teaching, learning and research”)
3. Student-centred learning, teaching and assessment	Deployment and implementation of the centre’s student-centred academic project	Intended internationalisation • Impact on education Action plans • Dimensions (“teaching, learning and research” and “students”)
4. Student admission, progression, recognition and certification		Action plans • Dimensions (“students”)
5. Teaching staff	Guarantee and enhancement of the staff of the university centre	Action plans • Dimensions (“teaching, learning and research” and “staff”)
6. Learning resources and student support	Guarantee and improvement of material resources and services	Action plans • Support
7. Information management	Outcomes analysis	Implementation • Information-driven management • Realisations
8. Public information	Publication of information on the centre’s activities and the academic project	Implementation • Information system
9. On-going monitoring and periodic review of programmes	Monitoring of the centre’s activities and the academic project	Enhancement • Measures for enhancement • Enhancing education • Stakeholders involvement
10. Cyclical external quality assurance	Every 6 years	Every 5 years

## Compulsory new EQA activities

### Institutional accreditation

As described in the "Guide to standards and criteria for the renewal of Institutional Accreditation of University Centres"<sup>26</sup>, the ESG are one of the main references for the development of the standards for the institutional reaccreditation. Table 1 in the Guide provides a mapping of the Unibasq criteria and the ESG part 1, as well as the correspondence with the criteria for the certification of IQAS.

<sup>26</sup> [https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq\\_Guide\\_Institutional\\_Accreditation\\_nov-2022-1.pdf](https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq_Guide_Institutional_Accreditation_nov-2022-1.pdf)

### Ex-post evaluation of artistic study programmes (new)

There is a clear alignment of the ESG part 1 with the procedure as the criteria<sup>27</sup> are the same as in the accreditation renewal as can be seen in table 3.

### Voluntary EQA activities

#### Labels (new)

In the case of the Labels (dual and internationalisation), the aspects to review<sup>28</sup> are the same as in the ex-ante accreditation of study programmes including specific criteria regarding dual learning (dual learning project, % ECTS at university/company, university tutors and company mentors...) and internationalisation (internationalisation project of the programme, mobility indicators...).

#### Accreditation renewal of study programmes outside the Basque University System (new)<sup>29</sup>

The methodology, review procedure and criteria are the same as in the regular accreditation renewal of study programmes in the Basque University System. Main difference is that the specific requirements of Spanish and Basque regulations don't apply.

#### CeQuInt Certification (new)

In the case of CeQuInt certificate, the framework<sup>30</sup> establishes different criteria for programme and institutional reviews. The attached table shows the mapping against the ESG Part 1 considering that "The assessment of internationalisation is voluntary, and it does not substitute existing external quality assurance or accreditation procedures. An assessment of internationalisation may be combined with regular external quality assurance procedures, but it is a supplementary and improvement-oriented service. This means that the Certificate for Quality in Internationalisation can only be awarded to programmes and institutions that have already been externally quality assured, though not necessarily at the same level." as it is explained in the framework for assessment of quality of internationalisation.

### Critical reflection

As can be seen in the correspondence summary tables and in each of the evaluation guides, the new Unibasq external quality assurance activities also address the effectiveness of the internal quality assurance processes of the institutions as described in Part 1 of the ESG, supporting institutional responsibility for quality assurance. Furthermore, as stated before, Unibasq believes that if institutions improve their internal management processes, this will enhance the whole Basque University System, helping further spreading of the quality culture already developed. In addition, and considering the recommendation made in the previous review, in the renewal of institutional accreditation there is a specific focus on the student-centred learning with a criterion (Deployment and implementation of the centre's student-centred academic project) focused on it. As explained in the previous section, most of the university centres in the Basque University System (around 70%) are institutionally accredited and will undergo the renewal of their accreditation in the following years.

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<sup>27</sup> <https://www.unibasq.eus/en/degrees-artistic-study-programmes/>

<sup>28</sup> <https://www.unibasq.eus/en/degrees-dual/>

<sup>29</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

<sup>30</sup> <https://cequint.eu/key-documents/>

## 5.2 ESG Standard 2.2 Designing methodologies fit for purpose

### *ENQA recommendations:*

*Unibasq is recommended to further develop its quality assurance procedures in order to further increase the fitness for purpose of the whole external quality assurance system, aiming for better balance between qualitative and quantitative approaches.*

*Unibasq is recommended to involve the Advisory Board more often at a strategic level in the development of the longer term strategy and vision of the agency on the development of the external quality assurance framework in the Basque country.*

Regarding the two recommendations of ENQA, as stated in the Follow-up report 2021, for the first recommendation Unibasq uses a qualitative approach in its external review activities, mainly during the interviews with the different stakeholders and considering the reflections they made in their self-evaluation reports. A set of indicators are used to monitor the delivery of the programmes and the IQAS of the schools and faculties and their evolution is considered in the external reviews, but always within the context of the programme/institutions and clarifications the managing teams give. This quantitative information is used together with qualitative information gathered during the interviews and the evidence universities give access to. Regarding the second recommendation, during the development of Unibasq's strategy, all the agency's bodies are involved to consider their views regarding the development of the external quality assurance framework in the Basque Country. The Advisory Board had a relevant role in the development of the new strategic plan 2020-2023 as can be seen in the methodology section of the document.

The definition of the external evaluation procedures performed by the Agency is done mainly by Unibasq's Advisory Board, which defines their aims and objectives in accordance with Spanish and regional laws, regulations and the ESG. The Agency's technical staff prepares the draft documents for the procedures, before they are sent to the Advisory Board, which discusses, if necessary, adds modifications or changes, and approves them. All stakeholders involved in higher education are represented on it: academics, students, professionals and international experts of the EHEA.

To ensure that the procedures to be adopted fit their pre-defined purpose, the Agency carries out meetings with the corresponding HEI before starting any new procedure. In the case of the Basque HEIs this topic is included in the periodic coordination meetings. In addition, when a new procedure starts Unibasq has always carried out pilot projects, for instance within the framework of the AUDIT (2013), Follow-Up (2010) and "Accreditation Renewal" (2014) procedures, and is currently running the pilot procedure for the renewal of institutional accreditation as explained before. The results of these pilot procedures provide valuable information about areas for improvement and of measures allowing the better achievement of the objectives of the processes. These pilots may also help Unibasq improving its review procedures and finding synergies among them, which allows the Agency to keep as low as possible the evaluation burden imposed on applicant HEIs. For example, in the procedure for the renewal of institutional accreditation, the outcomes of all the previous reviews of the university centre or the programmes under its scope, are part of a preliminary analysis report drafted by Unibasq, which is part of the documentation made available to the review team, making possible to avoid that some items are reviewed twice and focusing on the most relevant areas for review. Another important aspect of fitness for purpose is that for each type of evaluation Unibasq carries out a periodic meta-evaluation in which the participants (Committees, HE institutions, applicants...) assess the adequacy and performance of the procedure and suggest improvements for the future. The key findings are communicated to the Advisory Board, which analyses them and makes recommendations for the improvement of the evaluation procedures.

The general structure of Unibasq's evaluation procedures always considers aims and objectives, purpose, standards and guidelines, and evaluation methods. All agreed procedures and criteria for evaluation are published on the Agency's webpage. The composition of the Evaluation Committees is also published on the website.

## Compulsory new EQA activities

### **Institutional accreditation**

The revised methodology including all the steps stated in ESG 2.3. (a self-assessment report; external assessment including a site visit; report resulting from the external assessment and consistent follow-up) has been developed so the university centres can grant the renewal of accreditation of the study programmes they deliver without having to undergo the review of each of the study programmes as they have already proved the effectiveness of their own internal quality assurance systems. The renewal of institutional accreditation will review that the IQAS continues being effective and will assess the quality of the study programmes in an integrated manner. This will reduce the workload of EQA at the institutions. The preliminary analysis report included in the procedure of the renewal of institutional accreditation designed by Unibasq shows the best-case study of how the agency provides the panel with a thorough account of all evaluation procedures accomplished by the centre/school since the beginning. This account has a twofold purpose: firstly, to identify the effort made by the quality authorities throughout its development and, secondly, to show the fitness for purpose of the agency's procedures reducing the burden of justifying the detailed accomplishment of evidences by means of providing the whole account of evaluation processes. The institutions have been involved in the development of the guide through different meetings and providing comments to the different versions of the guide<sup>31</sup>. Moreover, Unibasq Advisory Board, which is composed of academic, professionals and students, reviewed the guide and add proposals for improvement before its approval on 11th November 2022.

### **Ex-post evaluation of artistic study programmes (new)**

The methodology is the same as with the rest of the official study programmes for the renewal of their accreditation and in line with the Spanish regulations regarding master programmes in the arts. Before the procedure started (one to-date) several meetings were held with the institution to make the coordinators aware of the procedure and criteria.

## Voluntary new EQA activities

### **Labels (new)**

This procedure is part of a new initiative which started with the Basque Decree 274/2017 regarding official study programmes, where it is established that the Basque official study programmes will be classified in different levels under these categories: 1. Innovative methodologies in teaching and learning; 2. Internationalisation; and 3. Links with companies, institutions, and some other organisations. Unibasq developed the methodology for reviewing “Dual learning”, linked to the last of the categories “Links with companies, institutions and some other organisations” and for internationalisation, considering the experiences of the universities of the Basque University System. Regarding the Dual label, Unibasq is the first agency in Spain to review this kind of teaching and learning activities following the models in place in Germany, France and Norway. This initiative has been presented in different fora (ENQA General Assembly 2017 and FECIES fora 2017 and 2018) and has fostered international cooperation in this field. In addition, this label is embedded in the Basque University-Business Strategy 2022, where representatives of the universities, Basque Government and industries are present. Moreover, the dual mention for study programmes available in the Spanish Royal Decree 822/2021, regarding university study programmes, is based on Unibasq's dual label. In the case of the internationalisation label, the origin is obviously the same, and the procedure was developed considering some already in place methodologies like the CeQuint certificate.

### **Accreditation renewal of study programmes outside the Basque University System (new)**

The methodology is the same as the accreditation renewal of study programmes in the Basque Country, without the specific requirements of the Spanish and Basque regulations but considering the specific context of the programme.

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<sup>31</sup> [https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq\\_Guide\\_Institutional\\_Accreditation\\_nov-2022-1.pdf](https://www.unibasq.eus/wp-content/uploads/2023/03/Unibasq_Guide_Institutional_Accreditation_nov-2022-1.pdf)

As explained before, Unibasq has just run two procedures in Chile following this procedure. In the first one, before the procedure started several meetings were held with the institution to make them aware of the procedure and criteria. In addition, a matrix of correspondence of Unibasq standards and the standards of the CNA Chile was made (see Annex 2) and the differences in the criteria were discussed. Moreover, in the meetings with the coordinators what a review following the ESG meant was described explaining that a student member would be included and that all the reports would be published. The second procedure was done last year in the framework of the agreement of Unibasq and the Chilean agency AcreditAcción<sup>32</sup>. In this case, both agencies agreed on a joint procedure after comparing their frameworks and agreeing on the use of a joint panel of Chilean and Spanish experts including a student and with coordinators of both agencies. The objective was to offer the programme under review a procedure which would not only follow the national requirements, but could align with international standards, in this case the Unibasq standards aligned with the ESG. The outcome was a joint decision of Unibasq and AcreditAcción once their Evaluation Committees agreed on the outcome.

### CeQuInt Certification (new)

The methodology was developed within the Erasmus+ project CeQuInt. The project consortium was composed of 14 partners from 11 countries, consisting of quality assurance agencies from Austria, Belgium (Flanders), Croatia, Germany (2), Finland, France (2), the Netherlands, Poland, Slovenia and Spain (2), the Academic Cooperation Association (ACA) and the German Academic Exchange Service (DAAD). Unibasq was not part of this project, as it wasn't a member of ECA in that moment, but once it joined ECA at the end of 2015, the option to carry out this procedure came up. As explained before Unibasq has run two CeQuInt reviews at the institutional level with two Spanish HEIs and before the procedure started several meetings were held with each institution to make them aware of the procedure and criteria.

### Critical reflection

The review and update of the evaluation procedures of the agency was one of the strategic objectives of the current strategic plan 2020-2023. As some procedures will be affected by the changes in the Spanish legislation, which is still undergoing, new reviews and updates will be done and communicated accordingly to EQAR if needed. All taken measures always consider the fitness for purpose of the external review activities and the continuous improvement of the Basque University System. In addition, there is always a focus on reducing the burden of external quality assurances activities on the HEIs and considering the previous reviews made in order to add value to the external reviews.



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<sup>32</sup> <https://acreditacion.cl/>

### 5.3 ESG Standard 2.3 Implementing processes

**EQAR suggestion:** The Register Committee, however, encouraged Unibasq to look into possibilities to strengthen its follow-up procedure for (voluntary) international reviews, and to clarify the expectation towards HEIs regarding the follow-up.

All procedures developed by the Agency, as a rule, include: a self-evaluation stage (self-evaluation or equivalent documentation, submitted by the institution on its behalf), the review by an assessment committee, and a report providing guidance for the actions to be taken by the institution. In the case of procedures comprising an implementation stage, the evaluation includes a site visit during which stakeholders are interviewed. Since all evaluations are made on a cyclical basis, there are follow-up procedures in place. Basque and Spanish study programmes must send a follow-up report to the corresponding Agency every year. In these reports, they always should provide information about how they are dealing with the recommendations from previous reviews. In the case of the international reviews, EQAR Committee’s suggestion was considered and for the second review the expectation is made clear in the joint decision of Unibasq and AccreditaAcción regarding the accreditation of the programme. Throughout all procedures, the Agency submits a provisional report to the applicant institution, so that the latter may make observations or factual corrections before the evaluation report is finalised. An appeal against the final report may be brought before the Committee for Ethics and Guarantees. All review reports of study programmes and institutions are published. Unibasq new evaluation procedures and types of activities held in each of them are summarized in the following table:

Table 5. Unibasq evaluation procedures and types of activities held in each of them.

Evaluation procedure	SAR	External review	Site visit	Appeals	Report publication	Follow-up
Accreditation renewal of study programmes outside the Basque University System	x	x	x	x	x	x
Labels - Dual	x	x	*	x	x	x
Labels International	x	x	*	x	x	x
CeQuInt certification	x	x	x	x	x	**
Ex-post evaluation of artistic study programmes	x	x	x	x	x	x
Institutional accreditation	x	x	x	x	x	x

\* The Labels procedures are desk-based reviews and no site-visit is included. Nevertheless, as the study programmes are already accredited and will have to undergo a reaccreditation either at programme level or as part of an institution, the site visit is included at some stage of the programme review.

\*\* In the case of CeQuInt certifications, the framework doesn’t establish a specific follow-up procedure; it is the regular follow-up procedures of the Agency which apply.

#### Critical reflection

Based on past recommendations from review teams, Unibasq requires HEIs to provide in their SAR an analysis of strengths and weaknesses of the programmes to be reviewed. This aspect has already been included in the “Guide to standards and criteria for the renewal of Institutional Accreditation of University Centres”. The expectation is that,

even if there will be still some programme level evaluation, most Basque University System university centres will be institutionally accredited soon and that the shift from programme to institutional accreditation is a reality in the Basque University System, which should give more opportunities for innovation and enhancement. This aspect will be further developed once the pilot phase of the renewal of institutional accreditation procedure is over and Unibasq can reflect together with the HEIs and experts involved in the options for improvement of the whole procedure. It will be also included in the new strategic plan.



## 5.4 ESG Standard 2.4 Peer-review experts

The evaluation processes are done by the Evaluation Committees supported by Agency staff. One of the key elements of the quality assurance of evaluation processes resides in the qualification and selection of experts.

The general composition of the Evaluation committees is defined in Act 13/2012, governing Unibasq. The Advisory Board has approved the requirements for the selection of experts<sup>33</sup>, which are published on the Agency's website. The Advisory Board also analyses the experts' curricula and proposes members of the evaluation committees to the Director for their appointment. The actual composition of each evaluation committee always seeks a balanced participation regarding genders (at least 40% each), knowledge areas and geographical distribution. Unibasq has its own pool of experts open to academics, students and professionals. Nevertheless, in specific cases when experts from very specific areas or with very specific profiles are needed, contacts with other agencies are made to find them. In addition, in order to increase the number of experts available some specific calls to institutions or other bodies (professional associations...) are made.

All experts must sign a declaration in which they commit themselves to respect Unibasq's code of ethics and guarantees<sup>34</sup> and declare that in case of any conflict of interest they will communicate it to the Agency to allow it to take the corresponding measures. Before any evaluation procedure takes place, the names of the participating experts are communicated to the institutions; this allows the HEIs to submit any reservations or objections they may have.

Prior to the implementation of the evaluation activities, Unibasq provides the experts with briefing and training and, if necessary, further informative sessions are held at later stages of the evaluation processes. During this training process the agency provides the experts with information about evaluation management, guidelines for the preparation of evaluation reports, explanations about the evaluation guides, etc. On-line modules for the training of experts participating in the ex-post accreditation procedures are also available.

The Act 13/2012 provides that Unibasq's evaluation committees include, among others, "students from the areas to be assessed, in the evaluation of programmes and activities that may have a direct impact on students; student members are nominated by the representative body of Basque university students". Students participate in all reviews regarding study programmes and institutions.

### Compulsory new EQA activities

#### **Institutional accreditation**

As established in the "Guide to Standards and Criteria for the Renewal of Institutional Accreditation of University Centres" Unibasq will constitute the review teams that will conduct the evaluation and the visit to the Centre.

Each team will have the following composition:

- An academic who will chair the team
- A variable number of academic members
- A person to act as secretary
- A student member with training in evaluation processes
- A labour market representative in the scientific-technical field of the programmes to be assessed.

The academics must have experience in quality evaluation (as far as possible in institutional and/or programme evaluation). One of the members of the review team must be an expert in quality assurance or university management. Experience of reporting processes prior to the authorisation, verification or monitoring of study programmes as a member of agency evaluation committees will also be an asset.

#### **Ex-post evaluation of artistic study programmes (new)**

<sup>33</sup> <https://www.unibasq.eus/en/database-of-experts-of-unibasq/>

<sup>34</sup> [https://www.unibasq.eus/wp-content/uploads/2019/10/Code\\_ethics\\_guarantees\\_2019.pdf](https://www.unibasq.eus/wp-content/uploads/2019/10/Code_ethics_guarantees_2019.pdf)



Unibasq appoints Panels of Experts that will carry out the assessment of the implementation of the programme and the visit to the centre/sites where the programme to be assessed is taught. The Experts Panel will act on behalf of Unibasq. The actions of the Panel of Experts shall be governed by the indications established by Unibasq in its Code of Ethics and Guarantees, as well as in the internal rules of the procedure.

The Panel of Experts shall generally have the following composition:

- A person who chairs it, who will have experience in the processes of issuing a prior report for authorisation, verification, monitoring or renewal of accreditation of programmes as a member of Unibasq or other agency evaluation committees.
- A variable number of academic members, to be determined according to:
  - The number of programmes to be evaluated.
  - The heterogeneity of the academic field of the programmes to be assessed.
  - A person to act as secretary during the visit.
  - One person to perform secretarial duties at technical level.
  - One student member from the academic field of the programme to be assessed, with training in assessment processes.
  - A person with expertise in Quality Management Systems (QMS).

## Voluntary EQA activities

### **Labels (new)**

The review for the recognition of dual education or internationalisation will be carried out by the Unibasq Vectors Evaluation Committee, made up of academic staff of recognised prestige from different fields of knowledge, a person with a professional profile and a student. The activity of the Evaluation Committee will be led by the indications established by Unibasq in its Code of Ethics and Guarantees, as well as in the specific procedures. This Committee may be advised by professionals, students and academics.

### **Accreditation renewal of study programmes outside the Basque University System (new)**

Unibasq appoints Panels of Experts that will carry out the assessment of the implementation of the programme and the visit to the centre/sites where the programme to be assessed is taught. The Experts Panel will act on behalf of Unibasq. The actions of the Panel of Experts shall be governed by the indications established by Unibasq in its Code of Ethics and Guarantees, as well as in the internal rules of the procedure.

The Panel of Experts shall generally have the following composition:

- A person who chairs it, who will have experience in the processes of issuing a prior report for authorisation, verification, monitoring or renewal of accreditation of programmes as a member of Unibasq or other agency evaluation committees.
- A variable number of academic members, to be determined according to:
  - The number of programmes to be evaluated.
  - The heterogeneity of the academic field of the programmes to be assessed.
  - A person to act as secretary during the visit.
  - One person to perform secretarial duties at technical level.
  - One student member from the academic field of the programme to be assessed, with training in assessment processes.
  - A person with expertise in Quality Management Systems (QMS).

In this case, as the review is done outside the Basque University System, experts from the Basque HEIs could take part.

### **CeQInt Certification (new)**

For CeQuint, as established in its Framework, the agency should appoint a panel of at least four members, including a student with international or internationalisation experience and experience in previous quality assurance procedures:

- At least two members should have an unquestionable international profile;
- At least two members should not be from the country of the programme or institution;
- At least one member should be from the HE system of the programme or institution;
- And at least one member, not the student, should be either specifically trained by ECA for the assessment of internationalisation or should have more than three experiences in assessing the quality of internationalisation as a panel member;
- All panel members need to have a good command of English.

The panel should combine the following dimensions of expertise:

- Internationalisation expertise;
- Relevant experience in teaching or educational development;
- Relevant experience in QA or auditing;

In addition, in the case of programme assessment, the panel members should provide subject- or discipline-specific expertise. While in the case of institutional level assessment, the panel members should provide management experience and be well acquainted with developments in the HE sector.

## Critical reflection

The selection and management of experts is of vital importance for Unibasq. In the current strategic plan, there was a specific objective addressing the need to attract and select the most relevant experts and another one regarding the update of the online platform to handle the pool of experts. The new platform facilitates the gathering of the relevant data of potential experts and to manage the data of the experts working with Unibasq. Regarding trainings, Unibasq is considering broadening the use of short videos for specific aspects of the trainings which could be available for the experts any moment they would need them.



## 5.5 ESG Standard 2.5 Criteria for outcomes

The rules for evaluation procedures and general evaluation criteria are made public on the website before the implementation of each evaluation procedure. These documents are published on the Agency's webpage under every specific procedure and in a specific section regarding "Documentation":

### Compulsory new EQA activities

#### **Institutional accreditation**<sup>35</sup>

Including information regarding the legal framework, procedure and evaluation criteria, Evaluation committee and Evaluation reports.

#### **Ex-post evaluation of artistic study programmes (new)**<sup>36</sup>

Including information regarding the legal framework, procedure and evaluation criteria, Evaluation committees and Evaluation reports.

### Voluntary new EQA activities

#### **Labels (new)**<sup>37</sup>

Including information regarding the procedure, the evaluation criteria, the Vectors Evaluation Committee, the calls and the evaluation reports.

#### **Accreditation renewal of study programmes outside the Basque University System (new)**<sup>38</sup>

Including information regarding the procedure, the evaluation criteria, Evaluation committees and the evaluation reports.

#### **CeQulnt Certification (new)**<sup>39</sup>

Including information regarding the procedure, with key documents as the "Frameworks for Assessment of Internationalisation" and "The Guide to Assessing the Quality of Internationalisation", the evaluation criteria, the evaluation reports and the certificates awarded.

### **Critical reflection**

To ensure that the procedures and criteria are applied in a coherent way, the following mechanisms are used:

- Clear procedure for the selection of experts, guaranteeing that the experts meet the required profiles.
- Training sessions for the experts prior to each evaluation process. These sessions provide training on the procedure to be performed, the items to evaluate and the criteria to apply. In the new activities as there are still very still reviews all the training sessions have been "ad hoc" training sessions for each of the panels or Committees.
- Analysis and review of experts' conclusions and decisions by the Evaluation Committee, which issues the evaluation report as a joint document.

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<sup>35</sup> <https://www.unibasq.eus/en/institutional-institutional-accreditation/>

<sup>36</sup> <https://www.unibasq.eus/en/degrees-artistic-study-programmes/>

<sup>37</sup> <https://www.unibasq.eus/en/degrees-dual/>

<sup>38</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

<sup>39</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

- Comparison of the evaluations made by different experts, to check that the evaluation criteria are being applied consistently. In case of divergence, the Chair of the Committee takes the necessary action to resolve the inconsistency.
- Assistance of the evaluation team by Agency staff during the whole process, to guarantee that the evaluation process fits the established criteria and procedure.

The lack of appeals submitted to the Ethics and Guarantees Committee and the lack of complaints is a key indicator of the fulfilment of this standard. The close relation with the Basque institutions and the periodic meetings make the procedures very clear to them.



## 5.6 ESG Standard 2.6 Reporting

**EQAR flag:** Reporting In the last review of the agency the Register Committee flagged for attention the publication of reports for evaluation of study programmes and monitoring reports of study programmes, which then were only communicated to the interested party. The review panel found that Unibasq published all reports, except for the ex-ante accreditation reports on programmes that have not been successful. In its additional representation Unibasq confirmed that it does not publish reports for the from ex-ante accreditation, arguing that it would be confusing for readers to find information on a study programme that will never exist. Unibasq did not express any intention to change this practice in future. The Register Committee underlined that all reports should be published as required by the standard. The Committee underlined that even if a study programme will not be offered it can be of interest for the public to know which concepts were denied accreditation and why. In particular, such information is important if the same programme applies for accreditation by another agency, which needs to be able to find out that it was earlier denied accreditation by another agency. As the flag was largely, but not fully, addressed the Register Committee did not concur with the review panel's conclusion of compliance, but concluded that Unibasq still complies only partially with ESG 2.6.

**ENQA recommendation:** Unibasq is recommended to further research ways to offer the available information in a more integrated way, making both quantitative and qualitative data easily accessible and comparable for all stakeholders, including students and employers.

After the last review, EQAR concluded that Unibasq complied partially with ESG 2.6 as Unibasq stated that the only reports which wouldn't be published would be the negative ex-ante accreditation reports, as the programmes wouldn't exist, and it could be confusing for readers. Even if in the last review period (2014-2018) there were no negative reports. In any case, the Unibasq management has decided that in the case of negative reports on the ex-ante accreditation process prior to the implementation of the study programmes, they will also be published with a note explaining that the study programme will not be taught. Thus, all Unibasq review reports will be published and uploaded to DEQAR database. Nevertheless, the suggestion that the programme with a negative ex-ante accreditation report could apply for accreditation by other agency, is a situation hardly feasible as the Spanish and regional legislations establish very clearly which agency oversees the reviews of the programmes on the different Spanish regions.

Currently all review reports are published in the specific section of each procedure, but some of them (of study programmes of the Basque University System) are also published in the Observatory of the Basque University System which is being updated. This is related to the recommendation of ENQA from the last review regarding offering the available information in a more integrated way. In the Follow-up report 2021, Unibasq already explained that Unibasq publishes on its webpage the review reports under the specific procedure area, so all the information regarding the specific procedure (legal framework, standards and guidelines, evaluation committees, etc.) and its objectives are clear. In addition, since the creation of the Observatory of the Basque University System activity<sup>40</sup>, each study programme has a specific area where all the related indicators and its different review reports can be reached. This way, quantitative (indicators) and qualitative (review reports with recommendations and good practices) data are easily available for all kind of stakeholders. We are currently updating the Observatory in order to make the information available to our main stakeholders more clearly and focusing on a small number of indicators. We will also include some introductory text to help better understand the information provided.

The evaluation reports are elaborated by the different Evaluation Committees. The structure of the reports follows the guides, templates, protocols, and criteria established in advance. In general, the reports are structured with an introduction (objectives of the report and description and analysis of the activities performed) followed by the main part containing the conclusions, commendations, and recommendations for enhancement. The evaluation reports are always issued as joint documents (based on a consensus between all members of each Evaluation Committee) and must provide clear justifications for their conclusions; these must be phrased in constructive terms, explaining how the possible weak points may be improved. Before the final report is issued, the institution always has a chance to point out factual errors.

<sup>40</sup> <https://observatorio.unibasq.eus/en/>

## Compulsory new EQA activities

### **Institutional accreditation**

The reports of the first stage of institutional accreditation are published in the Institutional accreditation section<sup>41</sup> and the second stage, the renewal of accreditation phase, is currently beginning. The first site visit was done in May 2023 and Unibasq is currently scheduling the site visits to the rest of university centres participating in the pilot procedure. By the time the panel visits Unibasq the first reports should be already published.

### **Ex-post evaluation of artistic study programmes (new)**

The review reports can be found in the Artistic Study Programmes section<sup>42</sup> and till now there is only one of them.

## Voluntary new EQA activities

### **Labels (new)**

The review reports can be found in the Unibasq Quality Labels section<sup>43</sup> and the certificates awarded in the Observatory of the Basque University System<sup>44</sup>.

### **Accreditation renewal of study programmes outside the Basque University System (new)**

The review reports can be found in the International evaluations section.<sup>45</sup> Till now there are just two review procedures in Chile.

### **CeQuInt Certification (new)**

The review reports can be found in the International evaluations section<sup>46</sup> and in the CeQuInt webpage<sup>47</sup> in the Awarded Certificates section.

## **Critical reflection**

As commented before, right now there is an interim moment when there are reports published in different places:

- Unibasq website: under the specific review procedure.
- Unibasq-Behatokia: under the specific file of each study programme. In the future, there will also be a section for university centres and the institutional accreditation reports will be there under a file of each of them.
- DEQAR: Unibasq is periodically uploading the corresponding reports.
- CeQuInt webpage: for the CeQuInt procedures run the reports must be also published there.

Unibasq believes that even if some reports might need to be in different places (DEQAR and CeQuInt), in the future the reports will be published at the Unibasq-Behatokia where additional information about the corresponding study programme or university centre is also available. This way the information will be clearer for any interested person and they will find the whole context of the programme and the institution. This aspect of further development of Unibasq-Behatokia will be included too in the next strategic plan.

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<sup>41</sup> <https://www.unibasq.eus/en/institutional-institutional-accreditation/>

<sup>42</sup> <https://www.unibasq.eus/en/degrees-artistic-study-programmes/>

<sup>43</sup> <https://www.unibasq.eus/en/degrees-dual/>

<sup>44</sup> [https://observatorio.unibasq.eus/es/grafico/ehu\\_g\\_cien\\_poli/](https://observatorio.unibasq.eus/es/grafico/ehu_g_cien_poli/)

<sup>45</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

<sup>46</sup> <https://www.unibasq.eus/en/international-international-evaluations/>

<sup>47</sup> <https://cequint.eu/awarded-certificates/>

## 5.7 ESG Standard 2.7 Complaints and appeals

**EQAR flag:** *In order to improve the appeals procedure, the former Ethics Committee became the Ethics and Guarantees Committee, which was composed of members who play an active role within the agency. The review panel noted that the composition of the Committee was limiting its independence. The Register Committee underlined the recommendation of the panel that the Ethics and Guarantees Committee be composed of members who are independent from the agency and the Basque higher education system. In its additional representation, Unibasq stated that the composition of the Committee had been changed. The new Ethics and Guarantees Code, which was approved by Unibasq's Governing Council, established that the Committee is now composed of experts from outside the Basque University System, who moreover cannot be part of any other Unibasq body or committee. The Register Committee was able to see the new composition on Unibasq's website. Furthermore, while the panel confirmed that Unibasq has developed a clear appeals process, it referred to "a more general procedure for the reception and handling of complaints and suggestion", but did not analyse that in detail. In its additional representation, Unibasq did not comment further on the complaints procedure. Given the unclear process for handling complaints, the Register Committee remained unable to concur with the review panel's conclusion of compliance, but concluded that Unibasq complies only partially with ESG 2.7.*

**ENQA recommendation:** *Unibasq is recommended to split the Ethics and Guarantees Committee and make sure the Appeals Committee is composed of members who are independent from the agency and the Basque higher education system.*

After the last review, EQAR concluded that Unibasq complied partially with ESG 2.7 because the process to handle complaints was unclear. Unibasq has a procedure to handle complaints and suggestions (PE\_04) which was already in place during the last review. The updated version of this procedure can be found as Annex 3. Unibasq has an online form<sup>48</sup> on the website to receive complaints and suggestions. As stated on the procedure all complaints received will be answered and an annual report will be done regarding the complaints received. Since the last review no complaints have been received.

As explained in the additional representation to EQAR regarding the composition of the Ethics and Guarantees Committee<sup>49</sup>, all the members are independent from the agency and the Basque Higher education system and the participation of Unibasq staff is only to offer technical support. This was also the answer to ENQA's recommendation. As a rule, all processes involving evaluation activities, including appeals procedures are made public on Unibasq's website. The names of the experts, who are part of the Evaluation Committees or panels, are made public before the evaluation procedures take place, which allows the evaluated institutions to submit to the Agency any observations or objections they may have.

The general procedure for appeals against the outcome of an evaluation procedure follows this pattern and is described in the documentation specific to each procedure, which is available online:

1. A draft evaluation report is issued by the corresponding evaluation committee.
2. The report is notified to the institution.
3. A period of usually 20 days is available for the institution to submit any claims or appeals, or to comment of factual errors.
4. The corresponding Evaluation Committee reviews the draft report taking into consideration any observation made by the HEI and a final evaluation report is produced.
5. When the formal decision belongs to the University Council (ex-ante, ex-post accreditation and modification of study programmes and renewal of institutional accreditation) Unibasq sends the final report, which is binding, to this Council. If the decision is negative, there exists an administrative appeals procedure allowing the University Council to ask Unibasq to review the proposed decision. In this case, the chair of Unibasq's corresponding evaluation committee would issue an additional report. If the outcome is still negative, the HEI has the option to appeal the decision in Court, in accordance with the Spanish Act 29/1998 on Contentious-Administrative Jurisdiction.
6. If there is no formal decision by the University Council, as in the case of voluntary procedures or reviews abroad, or in the case of a negative decision by Unibasq, the HEI may always apply to the Ethics and Guarantees Committee. The Ethics and Guarantees Committee is the body responsible for ensuring compliance with Unibasq's Code of Ethics and Guarantees including "To decide on appeals against certification and accreditation decisions, or evaluation reports

<sup>48</sup> <https://www.unibasq.eus/en/complaints-and-suggestions/>

<sup>49</sup> <https://www.unibasq.eus/en/social-responsability-3/>

issued by Unibasq that are based on a formal defect that damages any guarantees established in favour of the person or institution evaluated, or on a lack of impartiality by any person who intervened in the process. If the Committee decides to review the appeal, the consequence will be the declaration of nullity of the initial decision and the repetition of the appealed certification, accreditation or evaluation report". The procedure and grounds for appeals are set out in Article 6 of the Regulations of the Ethics and Guarantees Committee referred to in Article 21 of the Code. It is important to bear in mind that Article 4.4 of the Act creating Unibasq 13/2012 provides that "The evaluation committees must act fully independently and the result of their assessments cannot be changed by any other body of the agency".

For each of the new external quality assurance activities, the specific process is as follows:

### Compulsory new EQA activities

#### **Institutional accreditation**

The provisional Institutional Accreditation renewal report shall be sent to the university. If it is favourable, the Centre or University may make the appropriate considerations within a period of 20 working days. If the result of the provisional Report is unfavourable, the university may make the appropriate clarifications on the deficiencies detected within 20 working days. In addition to these clarifications, the university must attach an Improvement Plan with the characteristics indicated above. If, once the period has elapsed, no appeals have been presented, the University will be considered to have waived the right of appeal and the provisional report will become an unfavourable report with the status of a definitive report.

#### **Ex-post evaluation of artistic study programmes (new)**

Once Unibasq issues the provisional ex-post accreditation report, the institution has 20 days to make pleas and/or attach an improvement plan to the report. Following this, the final ex-post accreditation report is issued, and the corresponding Education administration will render, according to the binding report by Unibasq, its decision. In the event of an unfavourable decision, the institution may file an administrative appeal.

### Voluntary new EQA activities

#### **Labels (new)**

The Unibasq Vectors Evaluation Committee will draw up a proposal for a reasoned report, according to whether the established assessment criteria have been met, pronouncing itself in terms of favourable or unfavourable to obtaining recognition. In the latter case, the aspects that must necessarily be modified within the period for allegations to obtain a favourable report may be indicated. This proposed report shall be sent to the university so that it may present allegations within a period of 10 calendar days. Once the deadline has expired and the allegations have been assessed, if applicable, the Unibasq Vectors Evaluation Committee will draw up a final assessment report, which may be favourable or unfavourable, and will send it to the applicant university and the Basque Government.

#### **Accreditation renewal of study programmes outside the Basque University System (new)**

As stated in the Ethics and Guarantees Code, any communication on grounds for abstention, request for recusal or appeal shall be addressed to the chair of the Ethics and Guarantees Committee, by post (Unibasq, Comité de Ética y Garantías, C/ San Prudencio Nº 8, 01005, Vitoria-Gasteiz), or by e-mail (comite\_etica@unibasq.eus). The sender of the request will be informed of its receipt and whether it should be processed in this way.

If the procedure derives from an appeal against certification, accreditation or assessment decisions issued by Unibasq, the decision shall rule on whether there is a formal defect in the procedure used, or whether there is a cause of incompatibility of article 12 of the Code of Ethics and Guarantees, or whether any fundamental right has been



violated. If there are grounds for upholding the appeal, the decision shall annul the accreditation, certification or report issued and shall order that the proceedings be restored to the state and time at which the infringement or violation was committed.

### CeQuint Certification (new)

The CeQuint procedure has its own Appeals procedure regarding the final decision taken by ECA<sup>50</sup>.

In all the above procedures, in the event of any discrepancy, the university may appeal to the Agency. The Committee of Ethics and Guarantees will review the appeals made and take a decision. If the Committee finds a formal defect that damages any guarantees established in favour of the institution evaluated or in the case of the lack of impartiality by any person who intervened in the process, the consequence will be the declaration of nullity of the decision and the repetition of the appealed certification, accreditation or evaluation report.

### Critical reflection

As commented before, no complaints or appeals have been received regarding the new activities. This could be because the procedures are defined considering their fitness for purpose. In addition, there is a clear communication procedure with the HEIs and they know what to expect as it is always explained in the meetings done before the procedures take place and the training of the experts is adequate. Nevertheless, as part of the new strategic plan and the focus on improving Unibasq communication we will address this topic again. In addition, Unibasq is currently reviewing the Code of Ethics and Guarantees, mainly with a focus on the aspects dealing with potential situations of conflict of interests, which usually arise more in the case of academic staff evaluation, but also reviewing the whole document in order to update it. It is currently being revised by Unibasq Advisory Board and the Committee of Ethics and Guarantees and then it will be sent to the Governing Board for its approval probably by the end of 2023.



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<sup>50</sup> <https://cequint.eu/getting-certified/>

## 6. ENHANCEMENT STANDARD

### 6.1 ESG Standard 3.4 Thematic analysis

In the last review, ENQA made the following recommendation: Unibasq is recommended to structurally embed the practice of the publication of thematic analyses in its strategy and daily work, providing overview reports which bring together the results of its quality assurance processes and its other activities in order to inform (potential) students, the regional Government and society at large, and to serve as input for further quality improvement within the higher education system. At the same time, EQAR considered Unibasq to comply with the standard. Nevertheless, Unibasq included Thematic analysis as one strategic aspect to develop in its Strategic Plan 2020-2023 and that is one of the reasons why it was selected as the standard for enhancement. It is also true that the pandemic situation made us all change priorities for some time and some of the initial ideas regarding thematic analysis had to be postponed. In the next pages the evolution of Thematic analysis at Unibasq in the last years will be described and the future planning, which will be included in the next strategic plan, will be explained.

#### Advances since the last review

Since the last review and as described in the Follow-up report 2021, Unibasq continued with its efforts regarding the development of thematic analysis in the Basque University System. It should be highlighted that during the last years, and as a result of the Unibasq involvement in different international projects, the following publications have been published:

- Current practices on external quality assurance of academic recognition among QA agencies (ENQA occasional paper)<sup>51</sup>
- Integrating Academic Recognition and Quality Assurance: Practical Recommendations as result of the project LIREQA: Linking Academic Recognition and Quality Assurance<sup>52</sup>
- Implementing the European Approach for Quality Assurance of Joint Programmes - Background report as part of the project ImpEA: Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes<sup>53</sup>. In this last project, the main outcome is the European approach toolkit<sup>54</sup>.
- Finally, regarding international projects, the main outcome of the INNOMETH project (Assessment of innovative methodologies in teaching and learning in the Basque University System) funded by INQAAHE, the guide for reviewing these innovative methodologies is available<sup>55</sup>. The outcomes of the project were presented at the INQAAHE conference 2021<sup>56</sup> and a paper<sup>57</sup> was published.

Moreover, Unibasq was part of the REACU working group dealing with thematic analysis. This working group defined the common data that could be gathered in all Spanish agencies in order to make a system wide analysis of the ex-post accreditation results. As a result of this working group work and building on the research made by AQU Catalunya regarding the opinion of employers, together with some other Spanish agencies a cycle of webinars on the challenges in university education according to employers was organized. The main objectives of these webinars are:

- to offer a general and updated overview of the main challenges of university education in from the perspective of the employer community (reflection from an international perspective, although focused on the challenges of the immediate environment),

<sup>51</sup> <https://www.unibasq.eus/wp-content/uploads/2017/10/Current-practices-on-EQA-of-academic-recognition-among-QA-agencies.pdf>

<sup>52</sup> [https://www.unibasq.eus/wp-content/uploads/2017/10/LIREQA\\_recommendations\\_final\\_version\\_web.pdf](https://www.unibasq.eus/wp-content/uploads/2017/10/LIREQA_recommendations_final_version_web.pdf)

<sup>53</sup> [https://www.unibasq.eus/wp-content/uploads/2017/11/IO2\\_report\\_formated-2.pdf](https://www.unibasq.eus/wp-content/uploads/2017/11/IO2_report_formated-2.pdf)

<sup>54</sup> <https://impea.eu/>

<sup>55</sup> [https://www.unibasq.eus/wp-content/uploads/2020/11/Guia\\_evaluacion\\_INNOMETH\\_en.pdf](https://www.unibasq.eus/wp-content/uploads/2020/11/Guia_evaluacion_INNOMETH_en.pdf).

<sup>56</sup> <https://www.inqaahe.org/sites/default/files/INQAAHE-Conference-2021-day-2-Fernandez.pdf>

<sup>57</sup> [https://www.unibasq.eus/wp-content/uploads/2021/09/INQAAHE\\_conference\\_paper\\_Unibasq\\_2021.pdf](https://www.unibasq.eus/wp-content/uploads/2021/09/INQAAHE_conference_paper_Unibasq_2021.pdf)

- to present the opinion of employers on the adequacy of university education based on cases studies carried out in Catalonia,
- to debate on what should be the specific areas of improvement for university education in these areas.

In addition, the specific outcomes of the external reviews for the renewal of accreditation of these programmes in different regions in Spain were analysed in depth and shared and the outcomes are published together with the recordings and presentations.

- Nursing studies<sup>58</sup>
- Tourism studies<sup>59</sup>
- Infant and Primary Education studies<sup>60</sup>
- Journalism and Audio-visual Communication studies<sup>61</sup>
- Computer Science and Telecommunication studies<sup>62</sup>

## Next steps in thematic analysis

Regarding the postponed ideas due to the pandemic, Unibasq plans to include Thematic analysis in its new strategic plan 2024-2027 with a very specific focus. Inspired by initiatives of other agencies like the Enhancement Themes<sup>63</sup> of QAA Scotland or the approach to System-wide analysis<sup>64</sup> of NVAO – Flanders and building in the lessons learnt from the methodology applied in the INNOMETH project<sup>65</sup>, Unibasq plans to develop system-wide analysis on different topics of interest to the Basque universities. As the Basque University System is a very small system it can be feasible to involve the four universities plus Unibasq in a common endeavour. The aim is to have a space for co-creation and mutual learning regarding topics our institutions might be struggling with. The procedure would be to identify and agree a specific area/topic to work on. This could be the result of previous reviews, where an area/topic has been detected as challenging or as a reflection of the institutions/programmes in their annual reports to Unibasq. A working group with representatives from the institutions, students and Unibasq would be created, and experts (national and international) could be invited to share and learn from innovative international practice. The good practices and the lessons learnt will be gathered in a report and presented to a wider audience in a public event, either online or face-to-face. The first topic to work on could be the methodologies used by institutions to measure the satisfaction of internal and external stakeholders, particularly of students and graduates, as from Unibasq's reviews it is clear area for improvement. The different methodologies used by each institution make it difficult to make comparisons or to include indicators regarding satisfaction with the programmes at Unibasq's Observatory. Meetings with the Basque institutions will be held to present this initiative and to plan accordingly.

## Critical reflection

Some areas where there is still some internal discussion, and which Unibasq would like to receive input from the panel, are:

- if the external experts should be part of the working group or they could participate in peer-learning-activities joint or at each of the universities;
- if the universities should provide case studies or good practices, if there are any;

<sup>58</sup> <https://www.aqu.cat/es/analisis-y-datos/jornadas-y-talleres/los-retos-en-la-formacion-universitaria-segun-el-colectivo-empleador-el-caso-de-los-estudios-universitarios-en-enfermeria>

<sup>59</sup> <https://www.aqu.cat/es/analisis-y-datos/jornadas-y-talleres/los-retos-en-la-formacion-universitaria-segun-el-colectivo-empleador-el-caso-de-turismo>

<sup>60</sup> <https://www.aqu.cat/es/analisis-y-datos/jornadas-y-talleres/Retos-en-la-formacion-universitaria-en-Educacion-Infantil-y-Primaria>

<sup>61</sup> <https://www.aqu.cat/es/Estudios/Difusion/Jornadas-y-talleres/Retos-en-la-formacion-universitaria-en-Periodismo-y-Comunicacion-Audiovisual>

<sup>62</sup> <https://www.aqu.cat/es/Estudios/Difusion/Jornadas-y-talleres/Retos-en-la-formacion-universitaria-en-Informatica-y-Telecomunicaciones>

<sup>63</sup> <https://www.enhancementthemes.ac.uk/>

<sup>64</sup> <https://www.nvao.net/en/procedures/flanders/system-wide-analysis>

<sup>65</sup> <https://www.unibasq.eus/en/innometh-project/>

- the way to select topics and if a previous desk-based research would be useful.

Unibasq is very interested in discussing the approach is planning to use for this thematic analysis with the panel members before starting with it in 2024. It would be especially good if the panel members are aware of some other models Unibasq could use as inspiration. All suggestions will be very welcome and we are looking forward to engaging discussions.



### PART III – SWOT ANALYSIS

This section analyses the agency’s strengths, weaknesses, opportunities, and threats in conducting external QA. Before the current Strategic plan (2020-2023) was drafted, Unibasq made a SWOT analysis with the participation of the staff and representatives from the Agency’s different bodies. Most of the items detected as weaknesses and opportunities were addressed and specific lines and objectives were identified, together with key actions for their achievement and performance indicators for their monitoring. Since a new Strategic Plan for the new period (2024-2027) will need to be drawn up by the end of 2023, Unibasq has taken the reflection and consultation process for this SAR as an opportunity to start a new SWOT analysis. The provisional outcome is shown below. The Agency reserves its right for its decision-making bodies to make any changes to it before it becomes part of the next Strategic Plan.



## Strengths

- Committed and experienced staff. By the end of 2023 all the staff will be permanent. Most of the staff has been working at Unibasq for more than ten years and is highly qualified. This is one of the most highlighted aspects from the survey to the stakeholders.
- Closed relation with the Basque University System - mutual trust. While maintaining the independence in the review procedures, there is a fluid communication with the Basque HEIs and periodic coordination meetings. This facilitates a mutual trust environment which helps improving the system.
- Consolidated review procedures. Most of the review procedures regarding study programmes have been in place for nearly 10 years now. The new regulations will mean adaptations with a simplification approach.
- International activities (participation in networks, working groups and projects). Unibasq is member of several networks (ENQA, ECA and INQAAHE) and participates actively in all of them, either in working groups, projects or presenting the outcomes of its review procedures. This helps promoting innovation in the Basque University System and being aware of the last trends in quality assurance.

## Weaknesses

- Small team and diversity of activities - peaks of activities. Even if the current staff is enough to deal with all the activities, it is true that any health leave or similar can impact the team, above all if there is a moment with a high workload due to new activities or an increase in applications.
- Communication could be improved and adapted to different stakeholders. This is a topic already discussed at our Governing Board regarding the use of social media to reach to different stakeholders, particularly students.
- Need to update the website/corporate image. This is related with the previous weakness as the webpage could be clearer with specific sections for different stakeholders. This will be included in the next strategic plan.

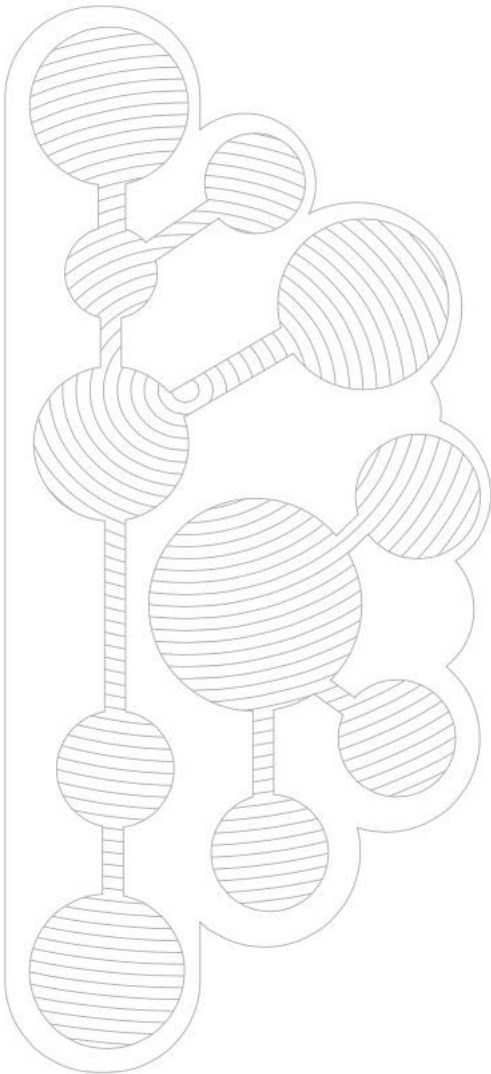
## Opportunities

- Benchmarking with other agencies – capacity building. Even if this is already done through the participation in the different networks, it could be further promoted.
- Innovation in QA as HE system consolidates. As the shift from programme to institutional accreditation is already happening, Unibasq considers that more innovative approaches could be used, reducing the workload of EQA.
- Prospective studies to further support our HEIs. This is related with the approach presented for Thematic Analysis, researching in topics where Basque HEIs struggle.
- IQAS more aligned with the Advanced Management Model (AMM). Unibasq is considering simplifying its IQAS aligning it with the Advanced Management Model. This topic will also be included in the next strategic plan.
- Further development of IT system – AI. One of the topics highlighted in the survey to the stakeholders were the online platforms used for the reviews. Unibasq will reflect and search for the most user-friendly platforms to facilitate the reviews and reduce the administrative burden. Regarding Artificial Intelligence, Unibasq considers it is a topic to further search and see the potentialities it might give, particularly regarding data mining and analysis for thematic analysis.

## Threats

- Regulation changes. As explained before, Spanish regulations are changing and, in some cases, the impact will be seen in the next years. In other instances, the need to develop additional rules as Royal Decrees, Decrees or other type of resolutions imply a delay in the drafting/revision of the procedures.

- Evaluation fatigue (HEIs and experts). Even if the shift from programme to institutional accreditation might avoid the sense of evaluation fatigue, as it will reduce the number of procedures, Unibasq considers that it is a risk but also an opportunity the development of the renewal of institutional accreditation as it might provide some added value to the institutions if the experts engage in a dialogue with the institutions about their academic projects and the opportunities for enhancement they might have.



## PART IV – CONCLUSIONS

Unibasq is a consolidated and reliable quality assurance agency, providing mainly external quality assurance services for the Basque University System.

The last full review was done in 2018 and since then several changes have happened in the Basque Higher Education System, a new university has been created and new regulations and adaptations are taking place in the Spanish higher education and quality assurance system. Regarding the agency's structure the staff is mainly the same with the consolidation of two of the temporary positions and the appointment of a new Director in November 2019. In addition, there are also new external quality assurance activities previously described, even if from the data regarding external quality assurance activities done by Unibasq in the last five years it can be seen that these activities are not so significant in terms of number of procedures. The Covid-19 pandemic also affected the work of Unibasq, although the shift to online working and review procedures was done in a natural way, following the previous digitalisation process undergone by Unibasq.

This reflection process has helped us focusing on the process for drafting the next strategic plan for Unibasq with a SWOT analysis which will help us addressing the main topics for enhancement for the next four years.

Unibasq is confident that this targeted review will support Unibasq reflection and further improvement of its review processes and thematic analysis and we are looking forward to the discussion with the panel reviewers.





## Abbreviations and acronyms

ACA	Academic Cooperation Association
AI	Artificial Intelligence
AMM	Advanced Management Model
CNA Chile	Consejo Nacional de Acreditación de Chile
DAAD	German Academic Exchange Service
DEQAR	Database of External Quality Assurance Results
ECA	European Consortium for Accreditation in Higher Education
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
FECIES	Foro Internacional sobre Evaluación de la Calidad de la Investigación y la Educación Superior
HEI	Higher Education Institution
ImpEA	Implementing the European Approach for Quality Assurance of Joint Programmes
INNOMETH	Assessment of innovative methodologies in teaching and learning in the Basque University System
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IQAS	Internal Quality Assurance System
LIREQA	Linking Academic Recognition and Quality Assurance
NVAO	Accreditation Organisation of The Netherlands and Flanders
QA	Quality Assurance
QAA Scotland	Quality Assurance Agency for Higher Education - Scotland
QMS	Quality Management System
REACU	Spanish Network of University Quality Assurance Agencies
SAR	Self-Assessment Report
SUV	Basque University System
ToR	Terms of Reference
Unibasq	Agency for Quality of the Basque University System (Agencia de Calidad del Sistema Universitario Vasco – Euskal Unibertsitate Sistemaren Kalitate Agentzia)
UPV/EHU	University of the Basque Country (Universidad del País Vasco/ Euskal Herriko Unibertsitatea)

## Annexes

- Annex 1 – Table of correspondence EQA activities and ESG Part 1
- Annex 2 – Table of correspondence Unibasq’s criteria for the renewal of accreditation of study programmes from outside of the Basque University System and the criteria of CNA Chile
- Annex 3 - PE-04 Unibasq’s complaints procedure
- Annex 4 – Analysis of the feedback received from stakeholders

