ENQA

EUROPEAN ASSOCIATION
FOR QUALITY ASSURANCE
IN HIGHER EDUCATION

ENQA
AGENCY
REVIEW

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ENQA AGENCY REVIEW:
AGENCY FOR EVALUATION AND ACCREDITATION
OF HIGHER EDUCATION (A3ES)

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EXECUTIVE SUMMARY

This Report presents an account of the analysis of the Agência de Avaliação e Acreditação do Ensino Superior (Agency for Assessment and Accreditation of Higher Education), A3ES, in Portugal, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is a European Association for Quality Assurance in Higher Education (ENQA) member agency and has been listed in the European Quality Assurance Register for Higher Education (EQAR) since 2014. This is A3ES's second external review against the ESG, coordinated by ENQA for the purpose of reconfirming ENQA membership and listing in EQAR. This Report is the result of a review process commencing with a Self-Assessment Report (SAR) by A3ES and an external assessment, including a site visit of the ENQA appointed panel to Lisbon in February 2019.

A3ES was established in 2009 as a private foundation, independent both from the government and from higher education institutions. The agency is responsible for the assessment and accreditation of all Portuguese higher education institutions and their degree awarding study programmes, taking into consideration the contribution of their internal quality assurance systems. The aims of the agency are pursued through the assessment and accreditation of institutions of higher education and their study programmes. The 2007 foundational legislation for the agency provided for a very strong reform agenda with a mission to complete an initial accreditation of all study programmes in operation, in view of removing those identified as of the poorest quality. There are four external assessment processes of the agency concerned with external quality assurance: prior accreditation of new study programmes; accreditation of study programmes in operation; institutional assessment for all higher education institutions at the end of an assessment cycle; and a voluntary audit/certification of internal quality assurance systems. As necessitated, the First Cycle of external assessments (2012-2016) comprised a systematic assessment of every study programme in operation, contributing to the removal of programmes that could not meet the minimum requirements along with an institutional assessment at the end of the cycle. A significant number of programmes were discontinued over the course of the Cycle. In 2018 the agency moved to a new strategy, articulated in a Second Cycle, with a greater focus on responsibility for quality assurance and assessment at the level of the institution where there is proven capacity. The agency also continues to conduct large numbers of programme assessments.

The panel found that A3ES is recognised by all stakeholders as the sole external quality assurance body for higher education in Portugal. Repeatedly the panel heard about the respect that is due to the Agency for achieving its mission in the First Cycle to re-establish trust in the higher education system through the assessment of all programmes and through the elimination of a proliferation of poorer quality programmes from the system. The panel found much to commend in the work of the agency. The commendations were for the financial independence of the agency (ESG 3.3 and 3.5), the analysis of quality assurance work and the agency's research in quality assurance matters (ESG 3.4), the work of the Scientific Council of the agency (ESG 3.6), the use of international experts in teams (ESG 2.4), the approach to the training of students (ESG 2.4) and the use of summary evaluative statements in some reports (ESG 2.6).

The panel also evaluated how A3ES had followed up on the recommendations from the 2014 review. The panel heard the focussed efforts of the Agency to develop, monitor and promote the development of the internal quality assurance systems of higher education institutions through the development of a Reference Framework, the completion of institutional assessments for all higher education institutions, the offer of an institutional audit process, research about institutional quality assurance and the exhortation to institutions to invest in SWOT analyses. The Agency has exceeded merely following up on the recommendation of the 2014 Review to improve their engagements with students

by building some commendable practices, particularly in the recruitment of students and collaboration with the Federation of Students Unions in promoting the practice of student engagement in quality assurance. The Agency has made good efforts to address the visibility of their reports and quality assurance, by making reports more accessible online and their outcomes more transparent, and the panel is satisfied that they have met the requirements of the recommendation though acknowledges there is always more work to be done to publicise QA reports to wider audiences.

The panel found that there is also scope for further improvement in the assessment processes of the agency and this was formulated as a small number of recommendations. There is some work to be done in making elements of the ESG and additional standards more explicit, the criteria clearer and the practices of institutions more open to external assessment. These findings led to a conclusion of 'substantially compliant' for ESG 2.5. Though the practices of the agency for student recruitment and training were admirable, the agency needs to extend these good practices to other external assessors, which led to a finding of 'substantially compliant' for ESG 2.4.

The panel also found that there were areas where they could make suggestions for further improvement. In the move towards a greater focus on institutional assessments, the agency could benefit from the experience and knowledge of the network of quality assurance officers of higher education institutions. The key guidance documents provided by the agency need to be streamlined and made clearer. In so, the agency could find ways to provide a more comprehensive set of references, encompassing and repeating standards and criteria from legislation, to allow for their development and interpretation over time, and to promote the four overarching educational objectives of the Council of Europe to a greater extent.   Finally, information about complaints and appeals procedures should be explained and communicated more clearly (ESG 2.7).

This review has arrived at a pivotal moment for A3ES. Having developed out of a reform-led agenda, of very tight external scrutiny of all programmes, the agency and the stakeholders are in agreement that it is time to move to a more open approach to institution-focused external quality assurance. All actors understand that there is a risk of repeating the mistakes of the past if this is not handled correctly. The agency is widely admired and has the confidence of the stakeholders. In order to retain this confidence, the agency must ensure that its processes are robust and demonstrate that they are open to scrutiny. The panel were mindful of the need to ensure strong process whilst also encouraging the agency to commence to open up its processes to a more open institutionally oriented system. It is intended that the findings of this report will assist the agency to tread this fine balance in the pathway that they have set out for themselves.

INTRODUCTION

This report analyses the compliance of the Agência de Avaliação e Acreditação do Ensino Superior (Agency for Assessment and Accreditation of Higher Education), A3ES, in Portugal, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted between May 2018 to July 2019.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. The present review takes place against the background of the revised version of ESG (2015). This version of ESG was built on previous iterations and raised expectations for all levels, for higher education institutions, for quality assurance agencies and for quality assurance of the higher education at the system level.

In this, second review, of A3ES, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. Given the aim of constant enhancement of agencies set out in the *Guidelines for ENQA Agency Reviews*, the panel adopted a developmental approach to the review.

MAIN FINDINGS OF THE 2014 REVIEW

In 2014 ENQA coordinated the first review of A3ES. The review tested Agency's fulfilment of expectations against the first version of the ESG (2005) and ENQA Statutes, which have been integrated in to the ESG as membership criteria along with additional, specific ENQA criteria.

The 2014 review panel concluded that in the performance of its functions, A3ES was in substantial compliance with the ESG with recommendations for future improvement. In the opinion of the panel the Agency was, however, an excellent organisation contributing to the enhancement of higher education quality in Portugal and that the Agency met all expectations to justify full membership of ENQA.

The panel stated three reasons for judging that A3ES was, overall, not fully compliant with the ESG 2005. The three areas were:

1. The Agency was encouraged to shift its focus to strengthening internal quality assurance systems and practices in higher education institutions;
2. The Agency was encouraged to do more to involve students in their procedures; and
3. The Agency was encouraged to improve the readability and accessibility on the Agency website of reports for the general public.

It was recommended that the Agency take appropriate action, in so far as it was empowered to do so, to achieve full compliance with these criteria at the earliest opportunity and was recommended to:

- Continue actively supporting higher education institutions to develop their internal quality assurance mechanisms in an effective but self-critical manner;
- Continue developing the engagement of students in the external evaluation teams;

- Reconsider the structure and accessibility of its reports to ensure a broader audience, in particular students and their parents, are informed and, indeed, sensitised to the significance of quality and its assurance.

Based on the 2014 external review report, A3ES's self-evaluation report, the EQAR Register Committee approved A3ES's inclusion in EQAR until 30 June 2019, in its decision of 29 November 2014, the Register Committee flagged the following issues for attention when considering a potential application for renewal of inclusion.

ESG 2.5: Readability and accessibility of reports: It should receive attention whether reports are geared towards the public with respect to their readability and accessibility.

ESG 3.7: Participation of students in programme reviews: It should be analysed how students have been systematically included in expert groups for programme accreditation.

In 2018, EQAR further advised that the self-evaluation report and external review report should also address how A3ES makes external quality assurance decisions based on reviews carried out by quality assurance agencies that are not registered on EQAR.

A3ES was expected to address these issues specifically in its subsequent self-evaluation report (the SAR for this review), setting out whether the issue had been resolved or indicating what progress has been made. A3ES was also advised to inform the coordinator of this review and the review panel of the need to address these issues in the external review report.

REVIEW PROCESS

The 2019 external review of A3ES was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of A3ES was appointed by ENQA and composed of the following members:

- Jürgen Kohler (Chair), Professor (em.) of private law and private litigation, Griefswald University, Germany (EUA/ENQA nominee);
- Orla Lynch (Secretary), Head of Cyclical Reviews, QQI, Ireland (ENQA nominee);
- Cláudia Sarrico, Quality Assurance Expert, Portugal; and
- Adrian Stan, PhD student, University of Medicine and Pharmacy "Victor Babes", Romania (ESU nominee).

Paula Ranne, Deputy Director of the ENQA Secretariat in Brussels, served as coordinator for the review.

A3ES produced a self-assessment report (SAR) in line with the ENQA Guidelines. In December 2018, the panel received the final version of the SAR. Via e-mail, the panel exchanged comments and observations, formulated questions and agreed upon the programme for the site visit.

ENQA organised a preparatory briefing for the panel (31 January 2019) providing additional information on the procedure. Prior to the site visit, the review secretary had regular contact with the A3ES liaison officer and the ENQA coordinator. The site visit took place between Monday 25 February and Thursday 28 February 2019.

This review report describes the outcomes of the review including the evidence, analysis and the conclusion for each ESG separately. The report includes the panel's commendations and

recommendations. It also covers progress made since the 2014 review, and the issues identified by EQAR when A3ES was admitted to the Register.

All panel members contributed to the writing process. After agreement of the review chair (22 March 2019), the report was submitted to ENQA for a last check. The final draft of the external review report (18 April 2019) was sent to A3ES for comment on factual accuracy (19 April 2019). After revision of the report following the comments of the Agency on May 7, 2019, the review chair submitted the final report 15 May 2019 to ENQA.

Self-assessment report

In December 2018, the Agency provided a self-assessment report to the review panel. The structure of the report aligned to the ENQA guidelines for SARs contained in the Guidelines for ENQA Agency Reviews.

The development of the SAR was coordinated directly by the executive members of the Management Board and the Secretary-General. The drafting of the report was mainly done by the President of A3ES (chapters 1-3) and the review coordinator (remaining chapters), after discussions in the Management Board and the inputs from the members of the Office of Research and Analysis (whose work is directly coordinated by the President). A first draft was sent to all staff members and there was a meeting with them to discuss the report. A revised version was then submitted for consultation to the Agency's bodies (Board of Trustees, Advisory Council and Appeals Council), to the Presidents of all External Assessment Teams and to higher Education Institutions through their representative bodies. Specific meetings with the Advisory Council and the Board of Trustees were organised to discuss the SAR. Finally, the SAR was discussed and adopted at the Management Board. Stakeholders were consulted via the members of Advisory Council. Higher education institutions were consulted via their representative bodies. The Presidents of the external assessment teams were also consulted.

The SAR has been published on the A3ES website. A3ES plan to publish the report and recommendations of the review panel on its website and to forward it to the Ministry of Science, Technology and Higher Education in Portugal.

Site visit

The panel visited Lisbon in February 2019. The panel arranged a 2.5 day site visit on Tuesday 26, Wednesday 27 and Thursday 28 February. The panel met in Lisbon on Monday 25 February to prepare for the visit and to meet with the A3ES coordinator for the review. The programme for the visit, agreed in advance was comprehensive. During the site visit, the panel had fifteen separate sessions of interviews which offered many opportunities to discuss and verify the findings in the SAR, and to gather further evidence. The programme (Annexe 1) included meetings with:

- The Minister of Science, Technology and Higher Education
- A3ES Management Board
- A3ES Board of Trustees, Advisory Council, Appeals Council and Scientific Council
- A3ES Secretary General and Staff
- HEI Representatives
- Representatives of A3ES External Assessment Teams
- Stakeholder representatives

- Students union representatives and student assessors

The Scientific Council, through its Chair Bjørn Stensaker, was interviewed by means of a Skype link.

The panel appreciated the open discussions in the interviews and the readiness of the Agency to provide additional documents. At the end of the visit, the panel passed judgement on compliance for each ESG as the outcome of the closed panel discussions. Scores used were fully, substantially, partially compliant or non-compliant. A final de-briefing meeting with A3ES completed the site visit, where the chair gave the panel's overall impressions of the review.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Following the 1974 revolution, there was a significant transformation of the higher education system in Portugal, comprising a change from an elite system with a low participation rate, to the development and expansion of a private sector of higher education and a polytechnic sector providing shorter and more vocational degrees. The expansion was extensive with a steady increase in the gross participation rates of 20-24-year-olds from a 7% in 1974, to 37% in 1995, 50% in 2000, 54% in 2005 and 67.3% in 2011 (SAR pp. 5-6). This period of expansion also resulted in differential changes in the rate of growth for different sectors, with a very rapid initial increase of enrolments in public polytechnics and the private sector, whilst enrolments in public universities increased at a slower pace. For example, from 1990 to 2000, total enrolments increased by 105.8%, but enrolments in public universities only increased 62% while in public polytechnics and in the private sector they increased 225% and 121 %, respectively.

In the 2000's, as a result of persistent low birth rates, the number of traditional students declined and there was a range of initiatives to maintain participation rates in higher education, particularly to increase the participation of mature students through reducing the lower age limit from 25 to 23 years and transferring responsibility for the selection of candidates (legislation 2005) to higher education institutions (HEIs). This change in policy had an immediate impact and the number of new mature students jumped from 551 in 2004/05 to 10,856 in 2006/07 and 11,773 in 2007/08. However, this may have been a temporary effect as there is evidence that, more recently, the number of these students has been declining (8,231 in 2011/12, 6,572 in 2012/13 and 5,513 in 2013/14).

In recent times the trend has been for enrolments in the private sector to decrease, with this sector losing about 53,600 students (47%) from 2000/01 to 2013/14. There is a more erratic pattern for the public sector, with several ups and downs, although enrolments in the sector over this period have increased by almost 28,000 students (10%).

The higher education system in Portugal is currently comprised of 113 institutions, 16 in the University public sector, 20 in the Polytechnic public sector, 23 in the University private sector, 53 in the Polytechnic private sector, and the Catholic University with campus in 4 different locations.

The university and the polytechnic subsystems are differentiated though it is acknowledged that the margins between the two sectors are porous. Polytechnic institutions are more oriented towards professional training, providing a scientific and technical education more focused on the transfer of existing knowledge to meet today's needs, rather than on the advancement of knowledge to meet the future needs of society and industry. Both types of institutions are expected to carry out research,

albeit of a different nature, with universities being responsible for basic research and polytechnics on applied research.

In 2006, the degree structure for higher education was changed in law to comply with the Bologna process. Universities and polytechnics award the degrees of *licenciado* (Bachelors) and *mestre* (Masters). Universities may also award the degree of *mestre* after an integrated cycle of studies of 10 to 12 semesters, in cases where, in order to access the right to practice a regulated profession, such duration is determined by an EU Directive or results from a consolidated practice in the EU member states. The degree of *doutor* (PhD) is awarded only at university institutions with qualified teaching staff, adequate facilities and an accumulated scientific experience. The Portuguese higher education system also includes short-cycle higher education programmes, *Cursos Técnicos Superiores Profissionais – CTeSP*, taught in polytechnics. CTeSP programmes award a higher education diploma and have duration of two years (120 ECTS).

In Portugal, access to higher education is governed by a generalised system of *numerus clausus* that applies to all study programmes. Students compete for a place in a public institution by indicating six possible combinations of institution/study programme by order of preference, relying on an access grade that is a weighted combination of their upper secondary school grades and grades in national examinations for the core scientific areas.

Regarding autonomy, the legal framework for higher education was fundamentally reviewed with the assistance of some international bodies and re-established via a series of laws passed in 2007. As a result, the most important decision-making body within public universities became the General Council which ratifies alterations to the statutes, elects or dismisses the Rector and appraises his decisions. Institutional strategies are defined by the Rector, who makes proposals to the Council and holds decision powers for disciplinary matters; creation, suspension and extinction of study programmes; the number of new admissions and enrolments; and the allocation of social support for students.

The provisions of the law are similar for polytechnics. Polytechnics have a President instead of a Rector. For private institutions the legislation recognises the role of their founding entity and adapts the rules governing the statutes to the private nature of the institutions.

A recent legal framework also provides for the possibility of higher education institutions to become public foundations operating under private law. Higher education foundations have, in principle, more management flexibility, for instance in the areas of finance and staff management, than institutions operating under public law. Presently, there are five universities and one polytechnic operating under this foundation framework.

QUALITY ASSURANCE

After the 1974 revolution there was an explicit government policy to expand and diversify HE and to increase student enrolments in fields that were of economic importance, with little attention paid to quality. In the early 1990's several factors contributed to the emergence of a consensus to set up a quality assurance system. The Council of Rectors of Portuguese Universities (CRUP) took the initiative in reforming quality assurance of higher education through the establishment of an initial QA pilot, following the Dutch methodology. This initiative was followed by the establishment of the Quality Assessment Act, Law 38/94. Following its recognition by the Ministry, the Foundation of Portuguese Universities became the Agency responsible for the assessment of public universities. Subsequently, separate coordination councils were established for the polytechnic public sector and for the

university and private polytechnic sectors, and a second assessment cycle for all institutions was launched in 2000.

In 2005, a new government commissioned a review of the Portuguese quality assurance system by ENQA. The findings were used to develop a new legislative framework to regulate a new quality assurance system for higher education and ensure compliance with the ESG. In 2007 the Parliament passed a Quality Assessment Act (Law 38/2007) defining the new quality framework, and the government passed Decree-Law 369/2007 defining the statutes of the present Assessment and Accreditation Agency for Higher Education (A3ES).

Four principles underpinned the establishment of the new quality assurance. These were:

1. Expanding the performance assessment of institutions;

2. Objectifying the evaluation criteria, transferring results into qualitative grades, level by level, making them comparable to each other, and clarifying the consequences of the assessment, both in terms of how the courses are run and financed by the higher education institutions;

3. Internationalizing the assessment procedure, namely at the level of institutional assessment; and

4. Requiring that higher education institutions conduct their own systems of quality assurance, subject to certification.

A3ES

The Assessment and Accreditation Agency (A3ES) was established in 2009 as a private foundation, independent both from the government and from higher education institutions. Under the legal framework established in 2007, the Agency is responsible for the assessment and accreditation of all higher education institutions and their degree awarding study programmes, taking into consideration the contribution of their internal quality assurance systems. From the outset A3ES oriented itself as an organisation in the service of quality enhancement, rather than an authority and this is reflected in the Agency's position that "The primary aim of the Agency is to assure enhanced performance of higher education institutions and their study programmes and assure the fulfilment of basic requirements for their official recognition. The aims of the Agency are pursued through assessment and accreditation of institutions of higher education and their study programmes, thus promoting an internal culture of quality assurance within institutions" (SAR Appendix 6, Quality Assessment Handbook p. 29). The legislation committed the Agency to complete an initial accreditation of the study programmes that were already in operation, in view of removing those identified as of the poorest quality.

The Agency initiated its activities in January 2009, adopting a strategy centred on the following points (from A3ES SAR):
- To implement a system of prior-accreditation of all proposals for new study programmes to begin in 2010/2011 and onwards;
- To implement a system of preliminary accreditation of all study programmes in operation at the time the Agency started its activities, checking that they complied with the minimum legal requirements – by the end of the academic year 2010/2011;
- To develop a five-year First Cycle of assessment/accreditation of study programmes, implemented experimentally in October 2010 and running smoothly as from 2011/2012;
- To implement a process of institutional assessment in 2017, as a round-up of the five-year cycle of programme accreditation;

- To discuss with the institutions the standards and procedures regarding accreditation;
- To foster the implementation of internal quality assurance systems;
- To internationalise the Agency; and
- To computerise the whole process.

The First Cycle 2012-2016
The first regular cycle of assessment/accreditation consisted of a systematic assessment of every study programme in operation in higher education in Portugal, undertaken from 2012 to 2016.

This extensive activity was achieved by grouping programmes into fields of study in order to include all study programmes belonging to a field in the same visit to each institution. This made it possible to reduce the costs of the operation and give the External Assessment Teams a wider perspective on the field of study or department. The same approached applied to the accreditation renewal of study programmes with prior accreditation and other programmes non-aligned with the regular accreditation cycle. A special procedure (PERA) was adopted to guarantee alignment with the regular cycle and therefore the integrated assessment of study programmes by area of education and training by a single external team.

The proportion of programmes that were either discontinued by higher education institutions before or during the accreditation process or were not accredited in the First Cycle was approximately 53%. As for programmes which were subject to the full accreditation process, a small proportion was not accredited (5%), while 2,513 (around 48%) of study programmes were discontinued by the institutions themselves, usually before the assessment was due. The elimination of programmes of low quality through the decision of the institutions themselves is viewed as being the major outcome of the First Cycle of A3ES operations.

At the end of First Cycle, A3ES conducted an institutional assessment, including, specifically, an analysis of the state of development of the internal quality assurance procedures of each institution.

The First Cycle corresponded with a systematic assessment of every study programme in operation, contributing to the removal of programmes that could not meet the minimum requirements. The institutional assessment process at the end of the cycle assisted the Agency in identifying stronger institutions with more highly developed internal quality assurance procedures.

The Second Cycle 2018-2023
The strategy of the Agency shifted in 2018 to a greater focus on institutional responsibility for quality assurance and assessment at the level of the institution. This cycle builds on the achievements of the First Cycle to ensure that external quality assurance remains relevant for all higher education institutions, both weak and strong.

With the intention of improving internal quality assurance systems and reducing the burden of excessive programme assessments on institutions with strong internal quality assurance systems, the Agency has introduced a "lighter touch approach", based on the principle of institutional responsibility for the quality of programmes. The lighter touch approach is based on a combination of institutional audits with a sampling system of programme accreditation. It is a selective process, applying only for institutions with (1) certified internal quality assurance systems (through process AISGQ), (2) an absence of conditions imposed for programme accreditations in the First Cycle, and (3) indication of high quality in relation to the qualifications of teaching staff and the quality of research, as indicated by the existence of research centres of proven quality in the First Cycle.

Institutions that do not meet the criteria will continue with the regular process of assessment/accreditation of all study programmes.

A3ES'S ORGANISATION/STRUCTURE
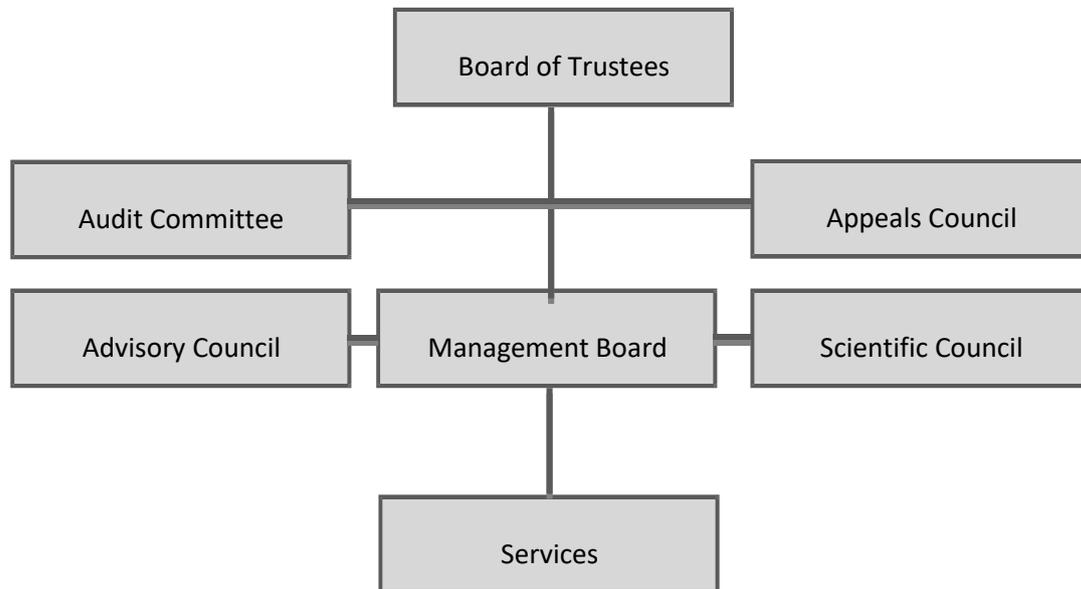The organisation chart of the Agency is presented in Figure 1.

Figure 1 Organisation Chart of the Agency

The **Board of Trustees** is composed of five members appointed by the Council of Ministers in consultation with the bodies representing the higher education institutions (public and private, universities and polytechnics). The period in office is five years, which can be extended for a further additional year but cannot be renewed. The Board of Trustees has, amongst its areas of authority, the mandate to appoint the members of the Management Board and of the Appeals Council; formulates views about the operation of the Management Board and issues recommendations for its operation; reviews the Agency's Annual Activity Plan, the Annual Management Report, the budget and the accounting.

The **Management Board** is responsible for performing all the necessary actions for fulfilling the Agency's objectives that the statutes do not commit to other bodies. The Board of Trustees appoints the members of the Management Board (a maximum of 4 executive members and 3 non-executive members) for a 4-year term of office that can be renewed. At present the Management Board is comprised of 4 executive members and 3 non-executive members. The executive members were appointed on 18 December 2008, being reappointed in 2012 for another term of office and again in 2016. The current non-executive members were appointed in 2016. The mandate of Management Board members can only be terminated by a decision taken by four fifths of the total number of members of the Board of Trustees based on substantial reasons such as permanent disability, serious violation of the duties or obvious incapacity.

The Management Board enjoys extensive powers of representation and management. The Management Board is responsible for commencing each assessment and accreditation procedure; approval of reports resulting from assessment and accreditation procedures and making final assessment and accreditation decisions (if necessary the Board's decisions may not follow the

recommendations of the external assessment teams); and the potential adoption of the results of assessment or accreditation carried out by other quality assurance bodies, national or foreign; the approval of regulations in the area of quality assurance in higher education.

The **Audit Committee** is responsible for checking the legality, regularity and proper management of the Agency's finances and equity, consisting of three members, with a three-year mandate, renewable once for a further three-year period, who are appointed by the member of the Government responsible for Finances. One of the members must be an official auditor.

The **Appeals Council** is the body for appeals against the decisions of the Management Board on assessment and accreditation. The Appeals Council consists of five members, appointed by the Board of Trustees, with relevant professional experience, without permanent ties to Portuguese higher education institutions, and must include people with experience in foreign counterpart bodies. At present the president of the Appeals Council is a judge, former president of the Portuguese Supreme Administrative Court, and the remaining members are two retired academics (a former rector of a private university and a former dean of a public university school), and two foreign experts.

The **Advisory Council** is a body that advises on matters of higher education quality assurance and provides support for the decisions of the Management Board. The Advisory Council must issue an official opinion about the Agency's annual activity plan, its general activity lines and strategic orientation. The membership of the Advisory Council integrates representatives of higher education stakeholders, including the Council of Rectors of Portuguese [Public] Universities; the Coordinating Council of the [Public] Polytechnic Higher Institutions; the Portuguese Association of Private Higher Education; the student unions for higher education, one of them representing university higher education and the other representing polytechnic higher education; the existing professional associations; the Council of Associated [Research] Laboratories; associations representing industry, commerce and services and agriculture; trade union confederations; interested ministries; and up to five specialists co-opted by the Council itself.

The **Scientific Council** is a non-statutory body integrating six foreign experts with recognised international competency in the area of higher education quality assurance. The Council convenes once a year to discuss a report of the Agency's annual activity and its development proposals. The Council produces a report containing its views and recommendations aiming at improving the performance of the Agency.

One important unit in the Agency's organisational structure is its **Office of Research and Analysis**, which allows the Agency's research staff to shift between more analytical and more hands-on work in the processes of assessment and accreditation. This unit is instrumental in strengthening the Agency's knowledge capital. This applies only to the Agency's staff hired as researchers, who also participate in visits to institutions as project coordinators. Other staff members are hired as project coordinators but, in general, do not have research activities on a regular basis, although they are encouraged to enrol in post-graduate programmes, namely at PhD level, and they participate in conferences and training sessions. The Office of Research and Analysis is responsible for many international scientific publications, including books and research papers, and it also produces reports on the Portuguese higher education system (see also section 9.4 of the SAR, on thematic analysis).

A3ES'S FUNCTIONS, ACTIVITIES, PROCEDURES
The Agency conducts the following quality assurance processes on a regular basis:
At programme level:

1   **Prior accreditation** of new study programmes in Portugal (**NCE**) – All new degree awarding study programmes (bachelor, master, integrated master and doctoral degrees) must undergo an *ex-ante* accreditation process before their implementation to ensure that they comply with the applicable legal requirements.

2   **Assessment/accreditation** of study programmes in operation (**ACEF**) – All degree awarding study programmes in operation (bachelor, master, integrated master and doctoral degrees) are periodically submitted to an *ex-post* assessment/ reaccreditation process to check whether the assumptions which led to the prior or previous accreditation are being met.

At institutional level

3   **Institutional Assessment (AINST)** – A compulsory process carried out at the end of a complete cycle of assessment/accreditation of study programmes in operation, which focuses on the performance of the higher education institution and each of its organisational units, with a view to provide a general and integrated overview of the Institution and each of its autonomous organisational structures. Institutional Assessment leads to a decision on the accreditation of the institution and its organisational units.

4   **Audit/certification of internal quality assurance systems** (**ASIGQ**) – A voluntary process with the purpose of auditing the institutional strategy for quality and how it translates into an effective and documented system of quality assurance, focusing on the processes and procedures for the promotion and assurance of quality within the institution. The audit process may lead to the certification of the internal quality assurance system by A3ES.

These processes apply to all institutions offering degree awarding higher education study programmes in Portugal. Each of these processes fell within the scope of this Review as per the Terms of Reference for this review (Annexe 2).

Some Portuguese higher education institutions offer a (limited) number of study programmes in Portuguese-speaking countries in Africa and in Macau. If the degrees are (also) Portuguese, as has been the case in those very few A3ES activities carried out in these regions to date, the institution must apply to A3ES to submit the study programmes to the assessment/accreditation process. All of these are programmes that have already been accredited in Portugal. The same procedures and criteria are applied in this process for these programmes, including the site-visit. So far, eight programmes under such conditions were submitted, operating in Macau (4 programmes, 2 accredited and 2 under way), Angola (one programme, accredited) and São Tomé e Príncipe (3 programmes, under way).

The assessment processes NCE, AINST and ASIGQ include the usual phases of: self-assessment; external peer-review assessment with a site-visit and the drafting of a report containing a proposal for decision and recommendations for improvement; decision by the Management Board on the accreditation or certification request; publication of the assessment report, together with the decision taken and, if available, the response from the institution; follow-up of recommendations. In case of appeal, the decision from the Appeals Council is also published.

The process of *Prior accreditation of new study programmes* (NCE) follows the same methodology but may not include a site-visit in the lighter touch approach, except in particularly complex programmes (e.g., in programmes of Medicine or when associated to the creation of a new institution). The external assessment team may, however, ask for further documentation on the programme or clarify unclear

aspects with the institution. This also applies to the special procedure PERA[1] referred to in section 4.3.3 of the SAR, which follows the same methodologies and guidelines as process ACEF, except that it may not include a site- visit and leads to a shorter renewal period as necessary to promote the alignment with the regular assessment/accreditation cycle.

The expiration of accreditation after 6 years implies a new assessment/accreditation procedure. The same applies to the certification of internal quality assurance systems. Formal follow-up procedures are defined for the case of conditional accreditation of a study programme or an institution and for the audit process.

A3ES has developed a comprehensive IT platform and applications for all processes are submitted using this. Each year the platform is open, at predetermined publicised periods, for the submission of applications (1st September to 15th October for requesting prior accreditation of new study programmes; 16th October to 28th December for assessment/accreditation of study programmes in operation; 1st February to 30th April for the Audit process).

The process of Institutional Assessment is run only every six years, as a round-up exercise at the end of each regular cycle of assessment/accreditation of study programmes in operation. It was run in 2017, after the First Cycle 2012-2016 of programme accreditation, and will, therefore, be run again in 2023 towards the end of the Second Cycle 2018-2023.

The following guidelines are publicly available on the Agency's site:

- Guidelines for requesting prior accreditation of new study programmes;
- Guidelines for self-assessment of study programmes in operation;
- Guidelines for institutional self-assessment;
- Guidelines for self-assessment of internal quality assurance systems.

Similarly, the reports from the external assessment team are also submitted online, on the corresponding form/guidelines:

- Guidelines for prior accreditation of new study programmes;
- Guidelines for external assessment/accreditation of study programmes in operation;
- Guidelines for external institutional assessment;
- Guidelines for auditing internal quality assurance systems.

The Assessment Handbook, which deals in detail with the prevailing assessment and accreditation processes, namely the concepts, principles and norms for internal and external assessment of study programmes, including provisions for the composition and functioning of the external assessment teams, the visits, the drafting of external assessment reports and their publication. The Simplified Assessment Handbook, which summarises the main concepts, mechanisms and criteria for assessment and accreditation of study programmes in operation thus facilitating its consultation by the experts in the external assessment teams or other interested stakeholders. The Manual for Institutional Assessment, aiming to lay down the objectives, organisation and functioning of the institutional assessment process. The Manual for the Audit Process, presenting the concepts, procedures and criteria underpinning the auditing and certification of internal quality assurance systems.

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[1] https://www.a3es.pt/en/accreditation-and-audit/normative-framework/special-procedure-accreditation-renewal

A3ES's FUNDING

In 2009, the Ministry of Science, Technology and Higher Education transferred to the Agency, as initial funding, the sum of one million Euros, as a set-up subsidy, and a financial contribution of three million Euros for installation. Following this initial funding, the State is not responsible for providing any further regular funds to the Agency, except for the payment of any rendered services commissioned by the State.

The services provided by the Agency are paid for by the respective recipients through fees for services.

Assets of the Agency consist of the initial set-up endowment granted by the State, revenues, as well as any assets, rights and obligations or economic content which are the property of the Agency. The Agency's own revenues include the fees due for assessments and accreditations; contributions or grants awarded by any entities, as well as gifts, inheritances or bequests; the revenue from services rendered to third parties and from the sale of its publications and studies.

After the initial financial contribution from the State for establishing the Agency, no further transfers of public funds were made, as foreseen, so its revenues are the result of services provided by the Agency and paid for by the respective recipients, which has made the Agency financially independent from the public budget. The Agency has accrued a monetary surplus throughout the entire time of its existence which allows the Agency to continue to operate in periods when there is no incoming revenue from fees.

FINDINGS: COMPLIANCE OF A3ES WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the Agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Evidence

Decree-Law 369/2007[2] states that the function of A3ES is "the assessment and accreditation of higher education institutions and their study programmes, and also with carrying out the functions inherent in Portugal joining the European system of quality assurance in higher education".

The mission, objectives and functions of the Agency are published on the A3ES website, as well as in the introductory sections of their Quality Manual[3]. In 2018, the Agency adopted a Strategic Plan, setting out a Second Cycle for the assessment and accreditation of programmes commencing is 2018 and ending in 2023. This Cycle builds on the experience and outcomes of the First Cycle, 2012-2017. The Second Cycle comprises a combination of simplified procedures for the assessment and accreditation of study programmes for all institutions, complemented by a lighter touch sampling system of programme accreditation combined with institutional audits for stronger institutions that meet three key indicators. In addition, the Strategic Plan emphasises the strand of research, the tracking of new developments in quality assurance, as well as internationalisation. On an annual basis, the objectives of the Strategic Plan are translated into published Activity Plans, and these are followed through with the publication of Activity Reports, which outline the achievements of the Agency against the published plans.

The underpinning philosophy and commonalities of approach of the Agency are set out in three key documents, the Quality Manual, the Assessment Handbook[4] (and more recently the Simplified

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[2] https://www.a3es.pt/sites/default/files/Decree_law369-2007.pdf

[3] https://www.a3es.pt/sites/default/files/Quality%20Manual_V1.1.pdf

[4] https://www.a3es.pt/sites/default/files/Assessment%20Handbook_Final.pdf

Assessment Handbook[5]) and the Regulations for Assessment and Accreditation Procedures[6]. The four procedures that comprise the daily work of the Agency are:

- Prior accreditation of new study programmes in Portugal (NCE)
- Assessment/accreditation of study programmes in operation (ACEF)
- Institutional Assessment (AINST)
- Audit/certification of internal quality assurance systems (ASIGQ)

Each of these is described on page 13, A3ES'S FUNCTIONS, ACTIVITIES, PROCEDURES.

The involvement of stakeholders in the governance and work of the Agency is achieved in a range of ways. Decree-Law 369/2007 established the Advisory Council as a body to *"provide an official opinion on the annual activity plan and on the Agency's major lines of activity and strategic direction"*. This Advisory Council meets 2-3 times per annum. The focus of the Council is on the annual Activity Plan and subsequent Activity Report, though it also considers items such as the development of strategy, strategic directions and the development of process criteria and procedures by the Management Board. The Council receives updates from the Agency at the beginning of each meeting.

The Board of Trustees can also be said to represent the views of stakeholders insofar as it is constituted to be representative of society in general and, under the powers granted by Decree-Law 369/2007, it is responsible for *"generally assessing the activities of the Management Board, with the possibility of providing official opinions or recommendations on the general lines of activity"* and *"providing an official opinion….on the….activity plan for the following year"*.

Decree-Law 369/2007 further established in principle that *"In the assessment and accreditation procedures, the contributions of all interested parties are openly asked for and taken into consideration in the decisions to be drawn."* In the implementation of process stakeholders are also involved through the legally mandated consultation with Ordens (representative bodies of professions) in the creation of new programmes (Decree-Law 369/2007). All site visits incorporate a mandatory meeting of the external assessment team with stakeholders, including a specific meeting with students. Each External Assessment Team (EAT) for ex-post programme accreditation and for external audit includes a student assessor, and a professional body representative for relevant programmes. In the interviews conducted by the panel, there was clear evidence of that meetings between the Agency and representatives of higher education institutions, students' unions and individual institutions take place effectively on a frequent basis. The Agency conducts surveys to harvest feedback at the end of its assessments. The Agency hosts a biennial conference on quality assurance, a popular event for stakeholders to engage and provide inputs.

Analysis

The panel found that A3ES undertakes external quality assurance activities in keeping with the definition of ESG Part 2 on a regular basis. The panel found that programme accreditation, both ex ante and ex post, is a regular and extensive activity of the Agency. The work of the Agency runs in 6-year cycles. At the end of the First Cycle (2012-2017) the Agency also conducted a once-off Institutional Assessment (AINST) of all higher education institutions and plans to do this again at the

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[5] https://www.a3es.pt/sites/default/files/Simplified%20Assessment%20Handbook_V1.1.pdf

[6] https://www.a3es.pt/en/accreditation-and-audit/normative-framework/regulations-assessment-and-accreditation-procedures

end of the Second Cycle. Institutional Audit assessment is a growing feature of its work as it is a requirement for the lighter touch approach of the Second Cycle. The external quality assurance of higher education remains the focus on A3ES's activities, though it is also supported by an impressive and complementary research function.

The panel found that A3ES has a clearly stated mission, objectives and strategic plan. The Quality Manual of A3ES further explains the quality philosophy of the Agency and this is elaborated further in the Assessment Handbook, particularly parts 1-3, which clearly set out the genesis and philosophy for the approach that A3ES takes. Through the extensive publications of the Agency and feedback from most of the people that the panel met the panel found that these are well understood and publicised to interested parties. Repeatedly the panel heard about the respect that is due to the Agency for achieving its mission in the First Cycle to re-establish trust in the higher education system. The panel did also hear that there is further work to be done by the Agency in publishing the nature and impact of its work for a wider audience and for influencing national policy based on experience. Nevertheless, it was clear to the panel that the mission and plans of A3ES are well communicated and understood amongst interested parties.

The panel found that the elaboration of longer-term strategy into an annual Activity Plan and, subsequent, Activity Report on the achievement of the targets set in the plan offers a clear, transparent and well communicated way of translating the objectives of the Strategic Plan into the daily work of the Agency. The panel was pleased to find that these were familiar documents for the groups that the panel met with over the course of the site visit. The current strategy is embodied in the roll out of a Second Cycle of programme accreditation, with simplified procedures for programme assessment combined with a sample-based approach to programme accreditation for more trusted institutions. This new, lighter touch approach (as outlined in the description of A3ES on page 10) has been documented and well communicated by the Agency and has already commenced in 2018 with an ambitious series of programme assessments over the coming period.

It was clear that the Agency involves stakeholders in their governance and work. The Advisory Council represents a wide range of external stakeholder perspectives and they recognise the importance of their role in so doing. Through the SAR and our meetings, it was clear that, as mandated by the Decree Law, the Council represents a good balance of a range of stakeholders and differing perspectives, including two student representatives. The Council, though only advisory in nature, is influential in the governance of the organisation, particularly in providing advice to the Management Board. The Board of Trustees can also be understood to be representative of society in general and they reflect on this in carrying out the duties assigned to them. Though students are members of the Advisory Council, the panel heard that there is some work to be done to ensure that they are active members.

It is noteworthy that students are not represented elsewhere in the governance composition of the Agency, particularly not in decision making governance bodies in general and specifically, the Management Board. The panel, however, does not only acknowledge that this is a result of the legal regulation which establishes the make-up of the various governance bodies, rather than a decision of the Agency. Moreover, the principle which governs the role of the Management Board, and its composition, is that of a small-size expert team of professionals with established repute in academia and strong experience in matters of quality assurance, with most members being salaried employees of the Agency. The panel views this as being a valid model of governance and management that is to be respected as a matter of feasible political choice, especially in view of the fact that students can influence the policies and practices of the Agency through their participation in the Advisory Council.

Stakeholders emphasised that the Agency involves their views in the development of processes, criteria and attendant procedures and, furthermore, is responsive to the feedback of stakeholders and

has made changes based on this feedback. For instance, in the development of the processes for the Second Cycle, the Agency responded to the request from representatives of polytechnic institutions for clearly differentiated procedures and criteria, particularly those for research. Though we were advised that there were individual instances where advice had not been followed, the panel understands that this is generally not the case. The Agency treads a fine balance between responsiveness and remaining independent, to maintain trust in the higher education system. In the Second Cycle, as the Agency shifts its perspective towards institutional quality assurance, it must find ways of harnessing expert views on this. The QA officers of higher education institutions are one group that can offer the Agency insights here.

Panel suggestions for further improvement

From the outset, the Agency has identified and worked with a wide range of stakeholders. The panel recommend that the Agency builds on this work to find a way of harnessing and engaging more directly, in both panels and governance, the experience of the network of quality assurance officers of higher education institutions.

Panel conclusion: Fully Compliant

ESG 3.2 OFFICIAL STATUS

> Standard:
>
> Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

As set out in the SAR, A3ES was established in 2009 as a private law foundation for an indeterminate period, with legal status and recognised as being of public utility. It was created by the Portuguese State by Decree-Law 369/2007, of 5 November, aiming at promoting and ensuring the quality of higher education.

The Agency has exclusive responsibility for the accreditation of Portuguese higher education institutions and their study programmes (articles 3.1, 3.2 and 7.8 of Decree-Law 369/2007). Professional bodies (the Ordens) are mandated to cooperate with the Agency and advise them through their participation in the Advisory Council and some programme assessments.

Analysis

The legal position of A3ES has not changed since the 2014 review where the panel found that "The review panel is confident that the Agency enjoys full legal status and seems to be accepted as such in the higher education community.". Meetings confirmed that the legal status of the Agency had not changed and that it continues to be understood, and is respected in fact, by all stakeholders as the sole external quality assurance body for higher education in Portugal.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

> Standard:
>
> Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Evidence

Decree-Law 369/2007, and the statutes for the Agency as an annex to the Decree, set out A3ES as a body independent of higher education institutions, government and other stakeholders and this has been carried through into the establishment and functioning of the Agency. As explained in the SAR, the features of the Decree law that ensure the independence of the Agency are:

- The Agency is a private law foundation, established for an indeterminate period, with legal status and recognised as being of public utility (article 2.1);
- The Agency is independent in carrying out its functions, within the framework of the law and its Statutes, notwithstanding the guiding principles set by the State through its own bodies (article 5);
- The members of the Management Board, who are appointed by the Board of Trustees for a term of four years, renewable, are independent in the exercise of their duties (Statutes, 10.1, 10.4);
- Cessation of the mandate of the members of the Management Board may only occur following a decision by a majority of four fifths of the total number of members of the Board of Trustees, based on: a) permanent disability; b) supervening incompatibility; c) serious violation of the duties entrusted to them; d) obvious incapacity regarding the normal performance of the respective duties (Statutes, 10.8);
- The rules concerning the accreditation procedures and their relationship to the assessment procedures are approved by the Management Board (article 7.5); particularly, the selection of experts and decision on the composition of the external assessment teams is the sole responsibility of the Management Board;
- In order to achieve its aims, the Agency may issue rules to its recipients that are compulsory and binding in nature, namely regarding procedures, technical criteria, and others (Statutes, 4.3);
- The accreditation decisions are of the exclusive authority of the Management Board, without prejudice to the powers of the Appeals Council, in case of appeal (articles 7.2, 7.8), and cannot be reversed or changed by government entities;
- The Agency has no regular income from the State budget (article 4.4) and since the set-up endowment in 2009 there was no further public income. Its revenues are generated through the services provided, which guarantees its financial independence.

When it was being established in 2009, A3ES was provided with an initial endowment of four million Euros from the State (one million Euros as endowment and three million Euros as a set-up subsidy). A substantial part of the endowment (3.1 million Euros) remains available to the Agency as a reserve fund. In meetings we heard that this, coupled with the capacity to charge fees for accreditations, has provided the Agency with financial autonomy.

The Board of Trustees is a key body in assuring the independence of the Agency in its establishment and operations, particularly the appointment of the Management Board. The Board of Trustees is itself established through a combined process of nomination (by HEI representative bodies) for two positions and the selection of three positions by the Minister in further consultation with the HEI representative bodies. Appointments are made on a rotational basis to ensure that the nomination of the Board does not entirely fit within one Ministerial term of office.

Analysis

In meetings, the panel was reassured to encounter strong evidence of the independence of the Agency. The Agency has acted independently in establishing and running the processes and criteria. It also selects and nominates experts for EATs independently. Decisions about accreditation are taken independently by the Management Board and these cannot be challenged by external authorities. Non-executive members of the Management Board are helpful in bringing broader and different points of view to decisions.

Though they are dependent on HEI fees for the delivery of day to day operations, the decision to provide the Agency with a start-up endowment has afforded them with an enviable financial stability and independence. Indeed, the panel views this as an enlightened and commendable action in the establishment of the Agency.

The panel were assured that as a public law foundation, the Agency has operational independence. The members of the Management board cannot be removed from office except through the very tight prescriptions established in the Decree Law for the Board of Trustees to act. Though partly composed of institutional nominees and partly composed of political nominees, the panel was further satisfied that, in its composition and the conduct of its duties, the Board of Trustees is also independent from undue third-party influence.

Panel commendations

The panel would like to commend the provision of an endowment to the Agency on its establishment which has provided a considerable measure of financial independence in its operations as well as a degree of financial stability.

Panel conclusion: Fully compliant

ESG 3.4 THEMATIC ANALYSIS

> Standard:
>
> Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

The Agency has an Office of Research and Analysis which complements their work as an accreditation Agency. The Office is staffed by four full time researchers, who also occasionally act as Project Coordinators for accreditations. Through the Office, as well as through the work of other Agency staff who are also active researchers, the Agency participates in a wide range of national and international studies and research projects on quality assurance in higher education. Their research has been published in a variety of publications in journals, books and book chapters, PhD thesis and other documents and is also easily accessible in a collective form on the A3ES website[7].

The IT system developed by the Agency for the accreditation processes also generates enormous amount of data about the higher education system. Since 2015, this information is combined with

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[7] https://www.a3es.pt/en/documents/publications

information accrued through agreements with the General Directorate for Higher Education, the General Directorate for Education and Science Statistics and the Foundation for Science and Technology, and used by the Agency to regularly publish synthesis reports with analysis for each field or scientific area, following the completion of the series of programme accreditations in that field. These synthesis reports are published on the A3ES website and promoted to the institutions and the media. So far 36 Summary Thematic Studies[8] have been published. The Agency makes efforts to disseminate and promote the findings with HEIs and the wider public.

The Agency also collects and analyses indicators on the impact of accreditation for self-regulation by higher education institutions annually in its Activity Reports. Examples of these indicators have included trends in the number of new programmes submitted for prior accreditation and the number of programmes discontinued on the initiative of the institutions.

A3ES internal quality assurance procedures include the collection of regular external feedback on the Agency's quality assurance processes from higher education institutions and members of external assessment teams through surveys. A3ES regularly publishes Reports[9] from surveys and improvement measures.

A3ES has an international advisory Scientific Council composed of leading researchers in quality assurance and higher education policies. The Council convenes once a year to discuss a report of the Agency's annual activity and its development proposals. Each year, the Council produces a report[10] containing its views and recommendations intended to improve the performance of the Agency. Occasionally A3ES also publishes a response to the report of the Council. The Reports of the Scientific Council are also published and actively considered by staff and members of the governance committees of the Agency and shape the strategy, research and activities of the Agency.

A3ES also publishes system wide analyses in a range of topics relevant for higher education, such as profiles of the system, employability trends, teaching staff characteristics and the extent of implementation of quality assurance on a system-wide basis. The Agency has participated in some wider European initiatives such as DEQAR and Erasmus+.

Analysis

The panel were impressed by the ongoing research activities of the Office of Research and Analysis, the Management Board and Project Officers. This work clearly demonstrates that the Agency has been able to use the information that it receives from institutions and programmes to conduct and publish analyses of relevance to the higher education system in general as well as specifically relevant to the development and improvement of the assessment, accreditation and audit processes and the quality assurance of higher education institutions. The panel concluded that the Agency places a high value on research and we heard repeated reference to the ways in which the Agency encourages all staff to remain active researchers. The panel also found that in turn A3ES makes good use of the findings of its research and analysis to inform and improve its own practice.

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[8] https://www.a3es.pt/en/documents/publications/a3es-–-thematic-studies

[9] https://www.a3es.pt/en/documents/documents/reports-surveys-and-improvement-measures

[10] https://www.a3es.pt/en/documents/documents/scientific-council

Panel commendations

The panel commends the analysis of quality assurance work conducted by A3ES through its Summary Thematic Studies, Activity Reports and other occasional studies and reports.

The panel commends the high value placed on research by A3ES and the ways in which the Agency uses its own and others' research to inform and improve practice.

Panel conclusion: Fully compliant

ESG 3.5 RESOURCES

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

Evidence

When it was being established in 2009, A3ES was provided with an initial endowment of four million Euros from the State (one million Euros as endowment and three million Euros as a start-up subsidy). 3.1 million Euros of the endowment is still available as a reserve fund. The work of the Agency is funded through the collection of fees for services provided, which are established by the Management Board based on the average costs of these services, following consultation with the representative bodies of higher education institutions.

The Agency has 26 permanent staff, appointed to the following roles:
4 executive members of the Management Board;
1 Secretary-General;
9 project coordinators and 4 researchers;
A jurist, two accountants and an IT technician;
4 technical and administrative staff.

The A3ES Project Coordinator is a full member of the External Assessment Team for accreditations. Their specific role is:
- To assist the President in coordinating activities of the External Assessment Team;
- To define, under the guidance of the President, dates and agenda of the visit with the HEI responsible for the study programme;
- To provide logistical, methodological, technical and advisory support to members of the External Assessment Team; and
- To report to the Agency any incidents or unforeseen events occurring during the external assessment processes as well as drafting critical reports, with a view to future improvement.

The responsibilities of the Project Coordinators are set out in the Simplified Assessment Handbook. All Project Coordinators have higher education qualifications and 70% hold a PhD. Depending on their availability, researchers from the Office of Research and Analysis take a role in assessments like that of Project Coordinators.

Each year the Agency employs the assistance of a between 300-700 experts as members of external assessment teams. They are remunerated, and this is calculated based on the number of study programmes and site-visits involved in their assessment work.

The work of the Agency is supported by an internet-based electronic platform developed through an IT specialised subcontractor. The platform is comprehensive, taking in applications, reports, responses and decisions, as well as serving as the main means of communication between the Agency and institutions. One in-house IT specialist and the specialised IT subcontractor support the database and the electronic platform. Additional IT, legal and accounting support are available through outsourcing.

Analysis

The Agency has always remained in a surplus budgetary position, and so the panel concluded that the financial resources available to A3ES are stable and adequate. There was also evidence of savings and efficiencies, which led the panel conclude that the resources are not excessive. The decision to grant the Agency an endowment upon its establishment is to be commended as it has afforded the Agency with financial security and, as already mentioned, financial independence. The panel heard from the Agency and other stakeholders that the rates for fees are calibrated to ensure that the current spending of the Agency is adequately resourced. However, some concerns were expressed about the fairness of the cost of accreditation, particularly for smaller institutions that are unlikely to meet the criteria for the lighter touch approach in the Second Cycle. The Agency acknowledged this in page 17 of the SAR and attempted to address this concern through the introduction of reduced fees for simplified processes. This should be monitored for effectiveness.

The Agency, through its Management Board and its Secretary General, has for many years been led by distinguished experts of quality assurance in higher education. These experts have shaped, and continue to shape, the policies and practices of the Agency, thus providing sound input to its operations. These favourable conditions will continue for the current term of office. Though it is agreed that the next Management Board should include a newer generation of members, there is also an awareness of the importance of continuity and ensuring that a complete change of members does not occur in a single changeover period. The panel views the role of the current distinguished experts in leading positions favourably and endorses the intention to safeguard continuity in retaining some of the current members, whilst also selecting newer members to join them, to continue the work of the Management Board in its next period of office.

Activity Reports demonstrated for the panel the regular achievement of Activity Plans on an annual basis by the Agency. The panel heard that the human resources available to the Agency were appropriate to the work of the Agency, staff were well supported in their work and workloads were appropriate. The panel heard from other stakeholders that the Agency is responsive and that there have been no undue delays in accreditation or communication processes. The Agency has been deliberately constructed around the dual functions of accreditation and research. There is efficient cross-functional interoperability, whereby all staff are encouraged to undertake research in slack periods and researchers undertake accreditation processes in peak periods of assessments. Staff are selected based on their qualifications and are encouraged to progress their learning and take on opportunities to develop and take on additional work. This encouragement to progress learning and to do research is borne out in the wide number of publications, theses and analyses published in the names of a cross section of staff. Members of the Management Board work in close collaboration with other staff, there is good ongoing communications and linking with project coordinators during process and the Secretary General plays a key role in smoothing processes and ensuring a coherent approach across the organisation.

It was clear to the panel that the Agency has invested heavily in their IT platform and that this has performed well for them as an efficient way of managing a high number of accreditations as well as a source of data and indicators about the higher education system. The information is submitted through fields, rather than through uploading documents. This allows the Agency to make extensive use of the data submitted through the platform and, in the case of the Second Cycle, to reduce the burden on institutions by reusing data already submitted by institutions in the First Cycle, as appropriate. The Agency acknowledged the need to keep on investing in and updating the platform, to improve on its user friendliness and interoperability.

Panel commendations

The panel commends the admirable foresight in the provision of endowment and start-up funds to the Agency on establishment as this has ensured financial stability and independence.

Panel conclusion: Fully Compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Evidence

A3ES has a formal published Quality Policy Statement[11] which sets out its policy and processes for internal quality assurance. This information is further elaborated on in a published Quality Manual which houses a wide range of information about the Agency, its strategy, its procedures and mechanisms for internal quality assurance and for external quality assurance. Quality assurance is central to the strategy of the Agency and elaborated in Activity Plans, the achievement of which is marked in subsequent Activity Reports.

Integrity is assured through the integration of a Code of Ethics[12] in the Quality Manual. The Code sets a clear standard for the ways in which all people employed by the Agency (permanent staff, temporary staff and External Assessment Team (EAT) members) carry out their work under the headings of neutrality and impartiality, integrity, confidentiality, transparency, responsibility, sobriety, no-conflict-of-interest, cooperation and team-work, professionalism and intellectual property rights. This code applies to the entire work of the Agency, including the conduct of complaints and appeals procedures. For EATs, the Agency provides further guidance in the document Norms for the appointment and conduct of the external assessment team[13], to assure the personal conduct of team members and the exclusion of conflicts of interest. Institutions are also given notice of the composition of EATs prior to

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[11] https://www.a3es.pt/en/about-a3es/quality-policy/quality-policy-statement

[12] https://www.a3es.pt/sites/default/files/Code%20of%20Ethics.pdf

[13] https://www.a3es.pt/sites/default/files/Norms%20for%20the%20appointment%20and%20conduct%20of%20the%20External%20Assessment%20Team_0.pdf

an accreditation and afforded an opportunity to confirm, or otherwise, any perceived conflict of interest by them. In meetings it was clear that staff and EATs are clear about their roles and familiar with the Quality Policy, the Code of Ethics and the need to manage conflicts of interest.

Apart from the use of external experts in teams, the quality assurance work of the Agency is not subcontracted. At the level of ancillary functions, there is some sub-contracting of IT, legal advice and accountancy services. Though there is no subcontracting of its quality assurance procedures, the Agency, in the conduct of external quality assurance activities, has operated in collaboration with MusiQuE and AVEPRO, listed in EQAR, and ABET.

The Advisory Council, consisting as it does of representative stakeholders, provides feedback to the Agency in the form of views on the strategy of the Agency, the procedures that it adopts and its annual Activity Plans and Activity Reports. The panel heard that the Advisory Council meets at least twice a year. The panel heard in meetings that: the Council has influenced the policies and procedures of the Agency; informed the rules around the composition of teams to ensure that the experts are from the field, especially for new programme areas; informed thinking about what constitutes a 'good programme'; and informed the direction of travel for the Agency with a shift from a comprehensive to lighter touch approach. The inclusion of the Ordens in the Advisory Council means that they can play a role in informing the criteria for the assessment of programmes and act as a source of information to the Agency about professional expectations for graduates. The Advisory Council has urged the Agency to make its valuable role even more visible in the public arena and this is an ongoing matter.

Activity Reports are both descriptive and analytical. The Agency makes careful use of indicators to examine the outcomes of its activities at a meta-level, both at the end of each year (ref. Activity Reports) and at the end of Cycles. A3ES uses feedback accrued through surveys to make improvements on a regular basis. The data set out in the Summary Thematic Studies are further used by the Agency to analyse the impact of its work. Specific studies conducted by Agency staff are used as an evidence-based approach to inform the development of new procedures and systems [14] [15].

From the outset, the A3ES governance structure has included a Scientific Council. The Council is composed of six international members who meet annually in the form of a visit to the Agency. The Scientific Council provides annual reports, commenting on impending challenges and making suggestions as regards policies to be considered for further improvement of the work of the Agency. The Agency, through its Management Board and its staff, highly appreciates the Scientific Council's substantial expert recommendations, and embeds these in the policies and practices of the Agency.

At the end of each assessment process, the Agency gathers feedback about its procedures from the higher education institutions, EATs and Project Coordinators through online surveys. This feedback is considered by the Management Board and Reports on the surveys' results and improvement measures are regularly produced, circulated to stakeholders and published on the website.[4] The use of both closed and open questions in the surveys for institutions and teams provides for a rich and welcome source of feedback for the Agency. A3ES also pays active attention to its regard rating in the data that it receives.

There is an annual Management Board meeting with project coordinators to identify more systemic issues and attempt to resolve them. The Agency also uses data generated by the IT system to consider

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[14] https://www.a3es.pt/sites/default/files/ESTUDO_SIGQ_EN.pdf

[15] https://www.a3es.pt/sites/default/files/Rosaetal_Nov09_0.pdf

the impact of its work, for instance in moving from First Cycle to Second Cycle the Agency conducted a global analysis of the evolution of the number of new study programmes submitted for prior accreditation and the number of study programmes discontinued on the initiative of the institutions themselves (see, for example, section 2 of the 2017 Activity Report[16] and the summary thematic studies, already mentioned).

There are also many opportunities for informal feedback, evidenced through the SAR and in a wide range of Panel meetings. Project Coordinators receive informal feedback from institutions after assessments. EATs have opportunities to provide feedback to the Agency informally via Project Coordinators and more formally in an annual meeting with the Management Board and via Surveys. For example, EAT members stated that the guidelines for self-evaluation by institutions had changed as a result of their feedback. Institutions reported ongoing opportunities for feedback to the Agency via representatives and directly. There are regular meetings between Project Coordinators and the Management Board. Each fortnight, Management Board meetings actively consider feedback. Staff of the Agency, particularly the President and the Secretary General, regularly and informally seek out opportunities for feedback on activities and results, the design of assessment processes and associated procedures through frequent meetings with the representative bodies of higher education institutions, student associations and, on request, individual higher education institutions. Efforts are made to address issues directly where possible or, if necessary, to bring them to the Management Board for further discussion.

Analysis

The Agency has a clear process for internal quality assurance which is set out in its Quality Policy and Quality Manual and ensures that the Agency pays attention to ensuring and enhancing the quality of its activities. The panel were satisfied that the Policy translates well into routine ways of doing work within the Agency which provide for both consistency and reliability in operations. Through the annual Activity Plans and Activity Reports of the Agency, the Quality Manual is a live working document. The Activity Plans and Activity Reports of the Agency are also familiar and well scrutinised documents by stakeholders.

The panel were able to see that the Advisory Council, though only advisory in nature, plays an important role in calibrating the direction of the Agency using an external perspective and their feedback is well attended to by the Agency.

The same applies to the role and influence of the Scientific Council. The inclusion of a Scientific Council into the structure of the organisation and the influence of the work of this group of experts on the work of A3ES is laudable. The panel heard that the Council is working well and that engagements with the Management Board continue to evolve over time. The Reports of the Council are valued and attended to by the Agency. The existence of this Council demonstrates a significant degree of maturity on behalf of the Agency in its willingness to lend its work to external international scrutiny on a regular basis and to value the feedback that it receives on this.

The panel found that A3ES is an active learning organisation. Agency staff that the panel met were conscious of doing their work in a quality assured way, of the need to work in a professional manner and to seek out, listen to and act on feedback. Roles are well thought through and clear. The panel was assured to hear from a wide range of groups about the professional way in which the Agency and

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[16] https://www.a3es.pt/sites/default/files/Activity%20Report%202017%20EN.pdf

its staff work. Staff receive ongoing coaching from members of the Management Board and opportunities to learn and improve. Staff are also encouraged to engage in research activities.

The panel received unanimous positive feedback about the biennial conference hosted by the Agency, which provides an opportunity for all actors in the system to come together, learn and identify lines of improvement.

The panel saw clear evidence of changes that had taken place as result of feedback, including but not limited to: the development of a Simplified Assessment Handbook; the development of a new document, Norms for the appointment and conduct of the external assessment team, to capture the guidelines for teams in a single place; the criteria the Agency uses in its assessment, to ensure that they are appropriate for diverse institutions; and the changes to the document Reference Framework for Internal Quality Assurance[17].

Though there has been no outsourcing of external quality assurance activities, the panel were satisfied that the agencies with which A3ES has cooperated are all EQAR registered, except ABET which is one of the oldest quality assurance agencies in the world. In follow up to the 2018 EQAR advice that the self-evaluation report and external review report should also address how A3ES makes external quality assurance decisions based on reviews carried out by quality assurance agencies that are not registered on EQAR, the panel finds that A3ES does not currently make any quality assurance decisions based on reviews carried out by quality assurance agencies that are not registered on EQAR.

The panel heard of the many ways in which the Agency actively seeks formal and informal feedback. The panel was impressed by the ways in which the Management Board uses this feedback to manage and address issues. The panel welcomes this but notes that where the reliance on informal methods is too strong, there can be a risk to ensuring that issues are accurately recorded and dealt with in a consistent and complete way.

Panel commendations

The panel commends the Agency in opening its work to the scrutiny of a Scientific Council of international experts to deliberate upon the organisation and its processes and make recommendations for developing and improving them.

Panel conclusion: Fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

Evidence

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[17] https://www.a3es.pt/sites/default/files/Referenciais%20ASIGQ_EN_V1.2_Oct2016.pdf

A3ES has been reviewed by ENQA every five years since it began in 2009. This is the second such review. The 2014 review was coordinated by ENQA and served as the basis for listing A3ES in EQAR.

The need for periodical international evaluation of the Agency is embedded in article 25 of the framework law for quality assurance in higher education. The Quality Policy states that there will be *"External international assessment of the Agency, every five years, complying with the European Standards and Guidelines, and the consequent integration in ENQA as a full member and in EQAR."*

The Quality Manual establishes that the frequency of the external reviews will be five years, as provided in the Statutes of ENQA.

Analysis

The panel was satisfied that A3ES undergoes external reviews every five years and are aware of the need for compliance with this to fulfil the standards of the ESG.

Panel conclusion: Fully Compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2014 review recommendation

Continue actively supporting higher education institutions to develop their internal quality assurance mechanisms in an effective but self-critical manner.

Evidence

The following Table extracted from the A3ES SAR gives an overview of the processes of A3ES and the ways in which they address the internal quality assurance processes of ESG Part 1.

Table 3 – Compliance of each quality assurance process with Part 1 of the ESG.

Assessment processes	Institutional level		Programme level	
	ASIGQ	**AINST**	**ACEF**	**NCE**
ESG 1.1	Target areas 1, 3, 4, 7 Reference Point 1 (*1)	Sections A.7.3.2/C.11.2 Reference Point 1	Section 7.2.1	
ESG 1.2	Target area 2.1 Reference Point 2	Sections A.7.3.2/C.11.2 Reference Point 2		The whole guidelines (*2)
ESG 1.3	Target area 2.1 Reference Point 3	Sections A.7.3.2/C.11.2 Reference Point 3	Sections 2.3.1, 2.3.2, 2.3.3	Sections 4.5.1, 4.5.3
ESG 1.4	Target area 2.1 Reference Point 4	Sections A.7.3.2/C.11.2 Reference Point 4	Sections 7.2.1, 1.11, 1.14 (*4)	Sections 1.10, 1.13 (*4)

ESG 1.5	Target area 2.4 Reference Point 9	Sections A.7.3.2/C.11.2 Reference Point 9	Guidelines 7.2.3, 3.4, 6.2.2, 6.2.4	Sections 5.5, 5.4, 8.2, 8.3
ESG 1.6	Target area 2.5 Reference Point 10	Sections A.7.3.2/C.11.2 Reference Point 10	Sections 7.2.1, 7.2.4, 4.1, 4.2	Sections 6.3, 6.1, 6.2, 7.1, 7.2
ESG 1.7	Target area 5 Reference Point 11	Sections A.7.3.2/C.11.2 Reference Point 11	Section 7.2.1	
ESG 1.8	Target area 6 Reference Point 12 (*5)	Sections A.7.3.2/C.11.2 Reference Point 12 (*5)	Section 7.2.5 (*5)	(5*)
ESG 1.9	Target area 2.1 Reference Point 5	Sections A.7.3.2/C.11.2 Reference Point 5	Section 7.2.1	
ESG 1.10	Target area 8 Reference Point 13 (*3)	Sections A.7.3.2/C.11.2 Reference Point 1 (*3)	(*3)	(*3)
Supporting document	*Manual for the Audit Process – Appendices I and II*	*Guidelines for institutional self-assessment*	*Guidelines for self-assessment of study programmes*	*Guidelines for requesting prior accreditation*

(*1) – Target areas 2.2, 2.3 and 2.6, and reference points 6, 7 and 8, relating to research and development, interaction with society and internationalisation, are also relevant to standard ESG 1.1.

(*2) – The design and approval of new programmes is the object of whole process NCE.

(*3) – Programme accreditation, institutional assessment and audit/certification are cyclical processes that require renewal every six years.

(*4) – Institutions are required by law to adopt and publish academic regulations (Decree-Law 74/2006, articles 14, 26 and 38). As regards certification of qualifications, institutions are required by law to issue the Diploma Supplement (Decree-Law 74/2006, article 49, §4).

(*5) – The legal framework for higher education institutions establishes a set of core information on the institution and its study programmes that must disclose on the institution's website (RJIES, article 162). This is checked by the external assessment.

In their SAR, A3ES also described the various ways in which the ESG Part 1 are comprehended by their processes. The document Reference Framework for Internal Quality Assurance Systems in Higher Education Institutions (updated post-ESG 2015 in 2016) operates as a guide to institutions on the expectations for their internal QA systems and encompasses the ESG and additional Portuguese guidelines and legal requirements, as well as being the basis for ASIGQ criteria. The two institutional-level processes AINST and ASIGQ (ASIGQ can also be at faculty and school level) assess the internal quality assurance systems of higher education institutions. The panel heard in meetings that all HEIs have come through the AINST process at the end of First Cycle and welcomed the opportunity to take a broader view of their internal QA systems. ASIGQ, whilst being a voluntary audit, is growing because the achievement of ASIGQ certification is tied to eligibility for the lighter touch approach in the Second Cycle.

The panel also heard that each time a programme is assessed, the IT platform draws in the information already provided in the institution-level processes and requires the institution to confirm or update the information and to describe the proper implementation of the quality system in relation to the programme under assessment. In the case of study programmes in operation (process ACEF), the external assessment team is required to produce an analysis of the effectiveness of the quality assurance mechanisms, based on the appropriateness of the most recent annual self-assessment report of the programme by the provider. The NCE process, though light on addressing some of the more global aspects of ESG, also draws on the outcomes of institutional assessment and encompasses some criteria which address more global QA matters such as the alignment of programme objectives to institutional strategy.

Finally, the panel heard evidence of the additional efforts taken by the Agency to meet with institutional representative bodies and institutions themselves, formally and informally, to explain and clarify criteria based on ESG and to work through issues and challenges around interpretation and filling in gaps, thereby ensuring a bottom up approach to building effective internal quality assurance

process based on ESG. For instance, the biennial conference was quoted by many stakeholders as a key event for stakeholders, HEIs and the Agency to meet and converge on interpretations and the socialisation of the ESG. The Agency also worked on a project that resulted in the production of a student guide on the ESG to encourage student engagement in quality assurance (EIQAS – Enhancing Internal Quality Assurance Systems, Erasmus + Project 2014-2016, Students' Guide on Part I of the European Standards and Guidelines for Quality Assurance and Internal Quality Assurance Systems). Though not formal external quality assurance processes of the Agency, these initiatives demonstrate a softer input-based approach to addressing the effectiveness of the internal quality assurance processes.

Analysis

Though there was strong evidence that ESG are generally covered, when the panel discussed the coverage with different groups a more variable picture emerged. In meetings, it was clear that the NQF is not labelled explicitly in the processes of A3ES. The panel was satisfied that it is effectively addressed as programmes are assessed against criteria based on Decree Law 74/2006[18], amended and republished by Decree-Law 65/2018[19], which regulates the organisation of degrees and the adoption of the Bologna process and therefore integrates the higher education portion of the Portuguese NQF. The panel heard evidence that ESG 1.3 is deliberately and well assessed in the programme evaluations but that EATs sometimes find this area difficult to manage in the assessment processes and may require further guidance. For ESG 1.5, legal requirements mean that A3ES is very thorough in addressing staff qualifications in assessments but less attentive to addressing staff recruitment and development processes. For ESG 1.4 recognition processes, the panel heard that the requirements of the Lisbon Recognition Convention are addressed where the need to address them arises, though there is no explicit reference to the Convention in documentation. Additional recognition criteria are addressed by the requirements of legislation, which is often a simple compliance check with legislation as institutions do not have autonomy for these (this is also true of other ESG that are formally built into Portuguese legislation). Though the new lighter touch approach will not include a site visit for every programme the panel was satisfied that through the sampling process, the material resources of the institutions can be assessed.

In some instances, elements of the ESG have also been embedded in Portuguese law. Though embedding the elements of the ESG in national law provides them with a consistency through legal powers, this has meant that there has been little scope for the interpretation of these criteria by the Agency and the institutions and limited scope to change the criteria for assessments as institutions grow and evolve i.e. through an increasing sensitivity to contexts. Through the adoption of a lighter touch approach, the Agency now acknowledges, based on criteria, that there are institutions that pose less risk and therefore deserve greater autonomy for programme accreditations. Over time, the Agency may need to consider the kinds of additional procedures these institutions will be required to put in place to support this autonomy and a more appropriate set of criteria for them.

In addition to losing opportunities for a more interpretative approaches where items are embedded in legislation, there is also a risk that, where they are not made explicit by the Agency, they will not be consistently addressed by EATs. Some of these items (e.g. the NQF or the four purposes of higher education of the Council of Europe, which the Bologna Process adopted in the London Communiqué of 2007) are only implicitly embedded, usually as inputs to the formation of programmes within

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[18] https://www.a3es.pt/sites/default/files/Decree_law74-2006.pdf

[19] https://www.a3es.pt/sites/default/files/Changes_Decree-law%2074-2006.pdf

institutions and are not subsequently thoroughly tested in the assessment processes. These areas and the attendant criteria need to be more explicitly addressed in process.

The 2011 A3ES paper[20] by Sergio Machado dos Santos laid the foundation for the Agency's approach to addressing ESG part 1 through institutional assessment to complement programme accreditation. This shift in direction has allowed for a more formal comprehensive evaluation of the elements of ESG Part 1 that are better and more efficiently captured at an institutional level, for instance ESG 1.1. All HEIs came through the AINST process at the end of First Cycle and the outcomes of this are used to actively inform ongoing programme accreditation by the Agency. Where the HEI has updated its procedures since AINST, there is an opportunity in the process for the EAT to evaluate them in programme accreditation. This ensures a more comprehensive programme accreditation analysis in addressing all elements of ESG Part1.

The panel supports these efforts by the Agency to ensure efficiency in process through the re-use of information provided in previous assessments for new programme assessment applications. The impressive IT system is capable of drawing in information from both prior institutional and prior programme assessments. The panel noted, however, that there is potential for a mismatch between the information set out in the guidelines and criteria and the areas addressed in report templates. This may be particularly problematic for international assessors, i.e. those least familiar with the system. Furthermore, the criteria for ensuring that there has been no change to procedures (and therefore the findings of the previous assessment stand) and making a fresh assessment where there has been a change need to be more transparently spelled out in the guidance to teams.

The Agency is very responsive to HEI institutions. The panel heard of many instances where members of the Management Board find informal ways of working to deal with challenges and issues. The panel would encourage the Agency to monitor these issues and find ways to move them out of the informal space by including them in guidelines, criteria and the ways in which their processes are conducted.

The panel heard the efforts of the Agency to develop, monitor and promote the development of the internal quality assurance systems of higher education institutions. The Reference Framework acts as a key guidance document. The AINST assessment means that every institution has been required to undertake an evaluation of its internal QA system, while the ASIGQ directly offers support to institutions in certifying their internal QA. The Agency has also conducted research about institutional quality, in tandem with their research on programme quality. The Agency also exhorts higher education institutions to conduct a SWOT analysis as part of their self-evaluation. The panel considers that these actions represent a strong follow up on the recommendation of the 2014 ENQA review and demonstrate that the Agency has targeted actions to address the recommendation.

Panel suggestions for further improvement

In order to support the maturing quality assurance procedures of higher education institutions and the development of an attendant comprehensive analysis by Teams, the Agency should consider ways in which it can provide higher education institutions and Teams with a complete set of references to consider in the quality assurance process by including, and where necessary, repeating standards and criteria that are also provided for in legislation thereby allowing for their development and interpretation over time.

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[20] https://www.a3es.pt/sites/default/files/ESTUDO_SIGQ_EN.pdf

The Agency should consider making more explicit in its documents the four overarching educational objectives formulated by the Council of Europe, endorsed in the Bologna Process and included in the ESG Guidelines under ESG 2.1., in order to draw attention of higher education institutions and Teams to the full breadth of the remit of higher education.

Panel conclusion: Fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2014 review recommendation

Continue developing the engagement of students in the external evaluation teams

Evidence

The four A3ES processes are defined and clearly set out individually and together in the documentation that the Panel saw. All have a clearly referenced basis in research. The key documents understood and referenced by a wide range of groups over the course of the site visit, for describing the purpose and nature of the assessment procedures are: The Assessment Handbook; The Simplified Assessment Handbook, for programme accreditation (ACEF and NCE); The Manual for Institutional Assessment for process AINST[21]; The Manual for the Audit Process for process ASIGQ[22].

These documents are further supported by an IT platform and a series of very detailed guidelines for the online submission of self-assessment reports for all four processes. A3ES includes SWOT analysis as a requirement for all self-assessment reports and the identification of improvement measures in ACEF, AINST and ASIGQ to encourage enhancement by institutions of their institutional quality assurance procedures. The institutional assessment (AINST) process at the end of First Cycle was a key point at which the more global aspects of the quality assurance systems of institutions were assessed and the information accruing from this has been carried into the Second Cycle, through the IT platform.

As mentioned before, stakeholder involvement is formally ensured through the existence of the Advisory Council as a formal means of inputs to planning and consultation. The Agency employs surveys and research to provide an evidence basis for their approach. As referenced already, the Agency has also sought out more informal means to check and calibrate their approach such as EAT and student training sessions, the biennial conference and meetings between the Management Board and representatives of institutions and directly with institutions.

21
https://www.a3es.pt/sites/default/files/Manual%20for%20Institutional%20Assessment_V1.0_EN_Jan2017.pdf

22 https://www.a3es.pt/sites/default/files/Manual%20Auditoria_EN_V1.2_Oct2016.pdf

There is evidence that A3ES have endeavoured to streamline their procedures and reduce burden, particularly in the way they leverage the reuse of information retained on the IT platform from prior process and recognising the outcomes of previous procedures (especially ASIGQ) in fulfilling the criteria for other procedures. In the Second Cycle the guidelines for programme accreditation have been simplified. Also, worth mentioning is the way in which programme accreditation is approached by scientific area, by clustering or grouping programmes together for accreditation within and across institutions. This approach reduces costs, as the EAT assesses a higher number of programmes per visit. It also allows for a timelier analysis by the Agency's Office of Research and Analysis for their Summary Thematic Studies.

The Agency is also promoting a new so-called "lighter touch approach" for programme assessments in the Second Cycle. In effect this approach means that where institutions fulfil specific criteria, the approach of assessing all programmes for accreditation is replaced by a sampling methodology coupled with an annual monitoring process based on indicators. The criteria are: a good record from former accreditations, in particular the absence of accreditations subject to conditions; teaching staff qualifications above national norms; research that has been reviewed internationally and received at least a 'very good' classification by the Foundation of Science and Technology (for universities) or significantly relevant activities of applied research/technological or artistic development/advanced training and services to the community (for polytechnics); and an ASIGQ certified process, i.e. certification of a trustworthy internal quality assurance system. The advent of this new approach in the Second Cycle, coupled with the application of the AINST approach for all HEIs at the end of the First Cycle represent the efforts of the Agency to shift the focus from a series of discrete programme accreditations towards a greater emphasis on the effectiveness of the internal quality assurance systems of institutions. This may be viewed as a good stepping stone on the way towards meta-accreditation of internal quality assurance systems of HEI's, which, due to the prescriptions of the current legislation, cannot yet be conducted by the Agency.

The outcomes of processes are published on the website and retained in the IT platform. Follow up is systemic and the outcome of follow up procedures are published.

Analysis

Throughout the published guidelines, the SAR and meetings the panel saw that the four assessment processes are well defined and understood, and that their purposes are aligned to the mission and objectives of the Agency. They were developed using research-based evidence, for example the 2011 A3ES paper[23] by Sergio Machado dos Santos, and in consultation with stakeholders. The processes for accreditation are fit for the purpose of accrediting programmes and their purpose has not changed in the Second Cycle.

The panel welcomes that the Second Cycle of accreditations represents a gradual adjustment in keeping with the strategy of the Agency to shift direction from programme accreditation, particularly the elimination of poor programmes, towards a greater focus on institutional autonomy and the enhancement of quality. The ASIGQ process emphasises the quality cycle and improvement, as does the introduction of SWOT and the identification of improvement measures in processes. The lighter touch approach offers a carrot to institutions where the risks are low. The features of this approach are published[24] and were understood by groups that we met. One small point, however, is that there

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[23] https://www.a3es.pt/sites/default/files/ESTUDO_SIGQ_EN.pdf

[24] Section 4, page 5 of https://www.a3es.pt/sites/default/files/Plano_de_Atividades_2019.pdf

was some confusion in interviews about the mechanics of the sampling system for programme accreditation and the Agency might think of ways to make this clearer for institutions.

While the panel was initially sceptical about the absence of individual programme-related checks on the concepts and design of internal quality assurance processes in cases of accreditation of new programmes, the panel was eventually convinced that abstention from such checks is indeed a valid method for reducing undue burden and duplication to the benefit of HEI's. The Agency rightly pointed out that checks on the availability of internal quality assurance processes at concept level had been a necessary part of the institutional assessment which every Portuguese HEI underwent at the end of the First Cycle of accreditation, and since HEI's usually take a standardised approach to the design of their internal quality assurance processes, reconsidering these while accrediting every new programme would entail a superfluous duplication.

The panel heard of the ways in which A3ES have made genuine efforts to reduce the workload and cost for institutions in consultation with them whilst treading a fine balance of maintaining standards. The synergies between processes, the IT platform and the approach to clustering accreditations are good examples of this, as is abstention from reiterating the assessment of concepts and design of internal quality assurance processes in the Second Cycle for new programme accreditations. As already highlighted, building in synergies between processes and the platform has meant that some of the documentation does not align. Though the panel was assured that this is not the case, it can look to an outsider like important criteria are not being addressed. Teams need to be careful, i.e. more explicitly guided to ensure that they can combine the information available to them from prior and current procedures and this approach needs to be carefully explained, and the criteria for this kind of differential evaluation spelled out, especially to the EATs.

The panel could see further potential for streamlining the documents of the Agency. Notwithstanding the sensitivity involved, it should be possible to house the criteria and guidelines for universities and polytechnics in a single document, perhaps by highlighting the different research criteria if necessary, and with extra provision for integrated masters and doctoral programmes. Over the course of the panel's meetings, it was clear that there remain criteria, especially more developmental ones, that are 'known' or 'understood' by all actors but not written down. There is an issue in relation to the distinction between the current guidelines and criteria and this is addressed in the analysis of ESG 2.5 below.

Whilst the Panel understand that the Assessment Handbook has effectively been replaced by the Simplified Assessment Handbook, it remains a published 'live' document and the former sections of the document provide a lively and useful narrative about the development of the external quality assurance system of Portugal as well as an indicator of overarching considerations and criteria for all A3ES assessments. It might be clearer to archive the Assessment Handbook and retain these sections as one document and let the programme assessment-specific documents do the work of explaining programme assessments.

Panel suggestions for further improvement

The panel suggests that the Agency undertakes a harmonisation project to streamline documents and in so doing make explicit the guidelines and criteria that are relevant to each assessment process.

The panel suggests that the Agency reviews the Assessment Handbook and retains the relevant elements that apply to *all* of its procedures as an important underpinning document for the work of the Agency.

Panel conclusion: Fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:
External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:
- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

Evidence

The features of the four processes for the external quality assurance of higher education (ACEF, NCE, AINST and ASIGQ) are published together in the Regulations for the Assessment and Accreditation Procedures and published in the Portuguese Official Journal (Diário da República[25][26]). They are also individually described in the series of guidelines and handbooks published by A3ES. The panel heard from a wide range of stakeholders about their engagement in the development of the processes and the approach of the Agency, their participation in the procedures and the success of the First Cycle of accreditation in building trust in the higher education system and the aspiration for the Second Cycle to continue to do this whilst growing institutional autonomy.

As indicated in the SAR and confirmed by the documents available and our site visit meetings, each process follows the following steps:
- The submission of a self-assessment report by the HEI;
- External peer review assessment, including a site visit (with one exception outlined below);
- A draft report, factual accuracy checking by the institution, a response by the institution, a final report including a proposal for decision;
- A decision on accreditation/certification by the Management Board;
- Publication of the Report, together with a statement of the decision and the response of the institution;
- Follow up on recommendations.

With the introduction of a lighter touch approach in the Second Cycle, some programme accreditations now take place based solely on desk analysis and without a site visit. In the case of ACEF programme evaluations, where the institution meets the quality indicators, has successful outcomes from previous accreditations and has completed both institutional assessment (end First Cycle) and been certified through the institutional audit approach, a sample of programmes only is assessed, and the institution is subjected to additional annual monitoring. Engagement in prior process ensures that the institutions qualifying for the lighter touch approach have already been visited by A3ES several times. To further mitigate the risk that this presents, when making an application, institutions are required to review the information provided in previous applications and

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[25] https://www.a3es.pt/en/accreditation-and-audit/normative-framework

[26] https://www.a3es.pt/en/accreditation-and-audit/normative-framework/regulations-assessment-and-accreditation-procedures

update and correct it where necessary. All the prior documentation is easily accessible to EATs via the IT platform, and the relevant information from prior accreditations is transferred into the application. The EAT can request additional information and clarifications and may select to conduct a site visit if they think that it is merited.

Programme accreditation decisions are valid for a maximum of 6 years. The certification of institutions through the ASIGQ process is also valid for a maximum period of 6 years. Renewal is conducted by means of a programme accreditation. Where there are mandatory recommendations following an accreditation process, a conditional accreditation decision is made with a specified timeframe for the adoption of the identified improvement measures. At the end of the period of conditional accreditation the institution submits a progress report and a decision is made on whether to grant full accreditation or to refuse accreditation. Where there remain areas for improvement, accreditation may also be granted for a shorter period of one, two or three years. This follow up procedure also applies to the institutional assessment (AINST) process. Institutions making applications for the renewal of programme accreditation are also encouraged to pay special attention in their self-assessment to explaining their follow-up on previous findings. Regardless of outcome, institutions are required to provide follow-up reports eighteen months after the ASIGQ audit. If there is a conditional certification, follow up takes place at twelve-month intervals. Follow up assessments for programme accreditations are not unusual events. Page 43 of the SAR described an average of 300 follow-up assessments per year since 2013.

Analysis

The panel was pleased, through its meetings with institutions and other stakeholders, to find that the Agency is highly respected for the professional and consistent way in which they approach their assessments. The panel were satisfied that A3ES has put in place a robust, reliable and well-respected system of quality assurance procedures. The procedures lead to published reports and the consequences are managed through a regular series of consistent follow-up procedures. Follow up activity is extensive.

In the Second Cycle the Agency is attempting to recognise the autonomy of stronger higher education institutions whilst ensuring that the system does not open itself up to repeating the mistakes of the past. The Agency continues to operate within the confines of a series of Decrees that were devised on the 2000s to effectively clean up the higher education sector. Accordingly, in the Second Cycle the Agency has inched the progression of the external quality assurance system forward with the adoption of the lighter touch approach. The panel acknowledges the success of the Agency in treading a fine balance and conclude that the lighter touch approach and simplified assessment procedures represent sensible first steps toward growing a more autonomous quality assurance system for strong institutions. In this context, the panel supports the removal for a need for site visits in the case of new programme accreditations as it has been carefully considered by the Agency and its stakeholders, and robust procedures have been put in place to mitigate any risk that this might present.

A3ES have consistent follow up procedures in place for all assessment processes. The panel was impressed by the scale of follow up procedures pursued by the Agency each year. The follow up on assessments with conditions is good. However, there is scope for the Agency to develop a more consistent and transparent approach to the follow up on recommendations in assessments that do not translate into conditions. This will become a more important feature of assessments as the Agency moves towards a system of greater institutional autonomy and an increased emphasis on the enhancement of quality assurance.

Panel conclusion: Fully compliant

> Standard:
>
> External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Evidence

The A3ES document Norms for the Appointment and Conduct of the External Assessment Team sets out the procedures that the Agency adopts to ensure consistency in the selection and deployment of External Assessment Teams (EATs). Each EAT is composed of three to five assessors, depending on the complexity of the assessment tasks involved. For programme accreditation procedures (processes NCE and ACEF), EAT members are experts in the main scientific areas of the study programmes under assessment. For institutional assessment and auditing (processes AINST and ASIGQ), experts are mainly selected among former rectors or vice-rectors of universities and presidents or vice-presidents of polytechnic institutions and can also include other academics with experience of higher education governance or experts on quality assurance. Aside from NCE, it is obligatory for each team to include an international expert and a student.

The President (i.e., chair) of each team is chosen first and plays a key role in collaborating with the Project Coordinator and Management Board to select appropriate experts to fill the remaining positions in the team. The Project Coordinator is also a full member of the team. Selection is made based on the field of expertise, independence and ensuring a balance in gender and geographical origin. The final decision on the composition of the team is made by the Management Board. The panel heard that the Agency makes every effort to keep the cost to a minimum by extending the number of accreditations carried out by teams per visit (mentioned on page 35) and keeping the number of team members to the minimum necessary to meet the criteria and embody an adequate range of expertise.

There is an annual training programme for non-student experts consisting mainly of clarification and explanation of the norms, criteria and guidelines. Evaluators also receive practical workshops on the use of the IT platform. International experts receive their documentation in English and a one-to-one coaching session with the President of the team. The panel heard that this usually takes place on the night before the site visit commences. The Agency has also developed a special online tutorial for international experts. In meetings the panel heard that more experience evaluators are encouraged to informally mentor new evaluators.

Since the 2014 review, the Agency has put in place a new approach for the recruitment and training of students. Students are recruited via a successful open call process. Though the open call has been successful, the Agency struggles with the recruitment of students for its many assessments and has recently changed the rules to allow students to continue to act as evaluators up to two years after graduation. The selected students are provided with an initial information pack and invited to attend a one-day training session. The training session consists of a morning session, mainly focussed on explaining the context for assessments, the procedures, the framework, guidelines and criteria and the norms for conduct as well as practical information about using the IT system. The afternoon is taken up with a simulation exercise in working groups. Following the training event, each student is required to submit an essay that demonstrates their understanding of external quality assurance. Whilst the attrition rate from call to training to deployment is high, the open call has been successful, and the students reported that they felt well prepared for the assessment processes, though the

Agency acknowledges that there is further work to be done in maintaining an adequate pool of students.

The Agency acknowledged that it had not used a student in its recent programme accreditation team in Macau and did not plan to use one for the forthcoming assessment in São Tomé e Príncipe. They explained that in both cases the evaluation centred on the use of an already accredited programme in a new location, hence this process was concerned only with simple matters of implementation of programmes already accredited, and that therefore the expense of a larger team could not be justified. This rationale also extended to non-student panel members, i.e. only two members of the original team were employed in the international accreditation team.

The Norms for the Appointment and Conduct of the External Assessment Team sets out the guidelines for Conflict of Interest and the principles behind this are explained in the Code of Ethics. Checks for conflict of interest are carried out systematically when EATs are being formed and team members and Agency staff are familiar with these.

Analysis

The document Norms for the Appointment and Conduct of the External Assessment Team specifies the selection criteria for teams as general criteria and roles which is clear and useful. However, the specific role and requirements for the contribution of each individual (non-president) team member is not spelled out and this requires further elaboration for each team member to be able to fully contribute to the process.

The concept of a peer reviewer, particularly for programme assessment processes, has been interpreted thus far in a narrow academic sense by the Agency. The panel would encourage the Agency to take a wider interpretation, aligned to the explanation of the concept of peer reviewer elaborated upon in the Guidelines for ESG 2.4. While this narrow interpretation has not caused problems for programme-based assessments, for institution-level assessment, which are likely to grow, there is a need to ensure that there is adequate QA expertise in teams. Though the presence of an A3ES project coordinator on each team ensures some measure of external QA expertise, the concept of peer review, particularly for external quality assurance processes with a strong focus on internal quality assurance operations, should also embrace the integration in teams of quality assurance experts who can provide the 'hands-on' internal perspective of higher education institutions. Since there already exists a network of independent institutional quality assurance officers in Portugal, the inclusion in teams of the expertise of its members might prove useful for institutional assessments. The panel would also recommend that, for programme assessments, the Agency explores ways to broaden the scope of teams to ensure adequate professional expertise from the field of study, though the panel acknowledge that this must be done in a way that does not cause undue additional expense.

The Management Board selects the pool of evaluators in the first place and the President for each EAT, who then works with the Management Board and, at first hand, the Project Coordinators to select the remainder of the team. Though this triple lock approach of getting three perspectives, Management Board, Project Coordinator and President, for the composition of each team is robust, there is potential for a reliance on a small number of familiar Presidents and EAT members, particularly as the initial selection of members of the pool is by the Management Board. This could result in a reduction of the diversity of teams, especially over time. Furthermore, though it makes sense to employ the same reviewers more than once to make the most of their experience and expertise, there is an equal need to ensure the smooth regeneration of the pool of reviewers over time. The panel would encourage the Agency to consider the extension of the open call model employed for the

selection of student reviewers in the selection of other experts. The panel acknowledge that there are inherent risks in making a public call and that careful screening processes must be employed to ensure the quality of the pool but these potential risks are outweighed by the benefits of opening the pool to a more diverse range of assessors, with more female assessors and experts from various geographical regions, which is something the panel understands that the Agency would like to encourage. The panel would also encourage the Agency to consider the extension of the online tutorial, currently available to international experts, to all experts, and to introduce a new training model based on questioning and interview techniques, for all experts, like the interview simulation approach currently available for student evaluators.

The panel commends A3ES on their approach to the recruitment and training of students. They have exceeded merely following up on the recommendation of the 2014 Review to build some commendable practice in their engagement with students. The panel heard that confidence in the student role has grown amongst all stakeholders and that students are accepted as full members and engage well. The use of an open call is a good practice as it eliminates any bias in selection. The panel heard that the Agency collaborates with the Students Unions in promoting the practice of student engagement in quality assurance. The panel heard repeatedly of the success of the training day, particularly the simulation exercise, in preparing students for assessments and again, the Agency also collaborates with the Federation of Students Unions on this training event. The panel was also impressed by the requirement for an essay to be completed by each student as it ensures that they develop their role as a member of an assessment team, a quality assurance expert, in addition to representing the student voice. This is also a good way of ensuring that the remaining students are committed to participating fully in the processes. There seems to be an overreliance on small number of PhD students for institutional assessments. The Agency might wish to consider ways in which more experienced student assessors could also be prepared to take on this role.

The panel heard that the single day of training is very intensive, with the communication of a lot of important information. The Agency might consider ways in which this could be improved either through the extension of the training session or by using online systems to convey information, though the panel acknowledges that there are cost implications for both; therefore, the panel would not like to detract from the sense of overwhelming positive regard for the student training day.

The panel thinks that, given the cost implications and the nature of the accreditations, it was reasonable for the Agency not to include students in their international assessment teams, though they ought to keep an open mind on this for future evaluations. The panel considers that if a full international assessment process is contemplated by the Agency, in the sense that it covers more than just a simple check of the implementation of accredited programmes in a new location, then the inclusion of a student assessor will be essential.

The panel was impressed by the PERA approach which groups assessments together by field of study with a single assessment team, thereby balancing responsiveness and flexibility in the deployment of teams. The panel acknowledges this flexibility works well for the Agency in the selection of teams and so is probably appropriate to continue with this approach, though it may need to be revisited if there is a growth in institutional assessments, which require a different combination of expertise.

The panel considers positively that there are mechanisms employed for eliminating conflict of interest and was satisfied that the details of each assessor is provided with their accompanying report and the CV of each expert is publicly available on the A3ES website.

Panel commendations

The panel would like to commend the Agency for ensuring that every assessment team has an international expert, thereby strengthening the external perspective of the team.

The panel strongly commends the innovative approach of the Agency to the selection and training of students.

Panel recommendations

Aside from the use of student reviewers, the Agency has interpreted the concept of a peer reviewer in an academic sense i.e. subject-matter expertise, and this is not fully aligned to the purposes of their assessments, particularly institutional assessments. The panel recommends that the Agency takes a wider interpretation, aligned to the explanation of the concept of peer reviewer in the Guidelines for ESG 2.4. In doing so, the existing network of independent institutional quality assurance officers provides a group with expertise that might prove useful for institutional assessments.

Suggestions for further improvement

The panel would encourage the Agency to consider the extension of some of the successful strategies employed for the selection and training of students and international experts to the selection and training of other experts. Worthy of extension are the open call model for selection, the online tutorial, currently available to international experts, and the interview simulation approach currently available to student evaluators.

Panel conclusion: Substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

> Standard:
>
> Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

As described in 2.1, the criteria for the assessment of programmes were established in Portugal under article 57 of Decree-Law 74/2006, and were amended and republished by Decree-law 65/2018. These criteria are reproduced by the Agency in their guideline documents to institutions and EATs and published on the Agency's website. In addition, there are further criteria set out in the document Qualification Criteria for Teaching Staff[27], which, as stated in the SAR, defines the minimum criteria on the key issues of qualifications of the teaching staff and the organisation and practice of research activities for the accreditation of study programmes (processes NCE and ACEF). In training, EATs are instructed on how to express their findings against the criteria.

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[27] https://www.a3es.pt/sites/default/files/Qualification%20Criteria%20for%20Teaching%20Staff-Set%202013.pdf

The criteria for institutional assessment (process AINST) are also defined in article 4 of Law 38/2007. Agency guidelines for institutional self-assessment explicitly link the criteria to the sub-articles of the law. Specific binding quantitative requirements for the creation and operation of a higher education institution are set out in Law 62/2007[28] and these are also tested in the AINST process.

The Manual for the ASIGQ audit process establishes the criteria for certification of the audited internal quality assurance system. The process also includes an assessment scale and criteria are provided for the different points of the scale.

As highlighted elsewhere in this Report, the Agency employs a range of mechanisms to ensure consistency: each team is supported by a Project Coordinator, who usually has experience of a wide range of programme accreditations in a field of study; the report templates for the assessments are highly structured, closely linked to the guidelines and criteria provided by the Agency and require that evidence is provided for the recommendations of the EAT; the Management Board takes the final decision on accreditation and certification and the panel heard of incidences where the Management Board overturns the recommendation of an EAT in particular in cases where they determine that the judgement of an EAT did not match set criteria by deviating from the general practice of their interpretation and application; and the Agency invests in staff training and training for members of evaluation teams to ensure consistency.

The information provided in the publication of Summary Thematic Studies is also a soft approach to providing an input to achieving consistency by helping to build a shared understanding of the features of good programmes in a field.

Analysis

In general, a criterion is a yardstick for judgement. The panel found that in many instances A3ES criteria fit more closely with the category of 'items to consider' or a 'script' for institutions and EATs. Many of the criteria are phrased in ways that do not establish thresholds. The Panel understands that some more qualitative items may not lend themselves to clear thresholds and so, for these, the Agency might need to consider the use of additional meta-criteria like fitness of purpose, fitness for purpose or benchmarking. Indeed, fitness *of* purpose i.e. the alignment of the programme/institutional QA to Bologna Process, national and institutional goals and objectives, though set out to some extent in the Assessment Handbook, is currently only an implicit criterion in the Quality Manual and has not been adequately elucidated in guidance documentation. Article 25 of Regulations on the assessment and accreditation procedures [29] provides a list of items that are relevant, but these are not currently established as criteria. The panel recommends that the Agency uses Article 25 of the Regulations as the basis for providing a range of overarching criteria to complement the existing criteria and give greater scope for their interpretation in different contexts.

At present, the guidelines and criteria contained within the documentation provided to EATs and HEIs consist of series of statements that effectively repeat each other, changing verb between guideline and criterion. The development of a clearer set of criteria and guidelines could be achieved by examining the existing set of guidelines, extracting the statements that make most sense as criteria and reviewing the remaining guideline statements to ensure that they provide substantial additional information about the topic, adding to them where necessary. The panel recommends that the

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[28] https://www.a3es.pt/sites/default/files/Law%2062-2007.pdf

[29] https://www.a3es.pt/en/accreditation-and-audit/normative-framework/regulations-assessment-and-accreditation-procedures

Agency considers together the current criteria and correlated guideline statements, to develop a new set of statements which distinguishes more clearly the difference between guideline and criterion and allows for overarching as well as specific criteria to allow EATs to make a more elaborate and useful set of judgements. In so doing it might be worth considering the approach taken in the ESG, with specific standards and a series of broader interpretive guidelines. The guidelines provided for audits demonstrate a better way to make the distinction between them, though there is a gap, mentioned above, on fitness of purpose.

The achievement of consistency depends on the process as well as the criteria. The panel were of the view that the Agency employs robust procedures through the role of Project Coordinators within and across assessments, the guidance to teams, role descriptors and the independent 'external' assessment of the Management Board of all assessments prior to each decision.

The terms used in translated versions of the guidelines for international evaluators may also merit some attention, as the current guideline read more as a script for the process rather than a guideline for criteria.

Panel recommendations

Article 25 of Regulations on the assessment and accreditation procedures provides a list of items that are useful, but these are not currently explicitly established in processes as criteria. The panel recommends that the Agency uses Article 25 of the Regulations as the basis for providing a range of overarching criteria to complement the existing specific criteria, thus allowing EATs to broaden the scope for interpretation of specific criteria in order to apply these more appropriately for the diverse contexts within which different HEI's operate.

At present, in many cases, each criterion and related guideline provided to EATs and HEIs usually repeats the same statement, in the main simply changing the verb. Therefore, in practice, the guidelines do not provide HEI's and EATs with helpful support with the interpretation of criteria and, as a consequence, the subsequent application of the criteria. The panel therefore recommend that A3ES clarify the distinct purposes of their criteria and guideline statements and, arising from this, reformulate a series of separate but complementary guideline and criteria statements.

Panel conclusion: Substantially compliant

ESG 2.6 REPORTING

> Standard:
>
> Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the Agency takes any formal decision based on the reports, the decision should be published together with the report.

2014 review recommendation

Reconsider the structure and accessibility of its reports to ensure a broader audience, in particular students and their parents, are informed and, indeed, sensitised to the significance of quality and its assurance

Evidence

Each member of the EAT is involved in drafting reports. They receive training and detailed guidelines. When signed off by the EAT, the draft reports are provided to the higher education institution for factual accuracy checking and for the preparation of an institutional response. The final version of the Report is published on the A3ES website. Each Report is published alongside easily accessible details about the institution, the date of the decision and the validity period for the decision. This applies to all of the quality assurance processes of A3ES (NCE, ACEF, AINST and ASIGQ).

The IT platform of the Agency supports the Report writing, governance and publication procedures. The Agency provides detailed electronic report templates. During the site visit, the panel received a demonstration of the IT platform from A3ES. Through the demonstration it was clear that the platform facilitates the writing of the reports as the experts can easily access and draw in all the information relating to the assessment on one screen. The platform means that the drafting of the reports takes place online, with specific fields for responses, and this ensures a high consistency of approach and greater opportunities for comparability between reports.

More recently, the Agency has required EATs to provide global appraisal statements, for each thematic area in a report and then overall at the end of the report. These require the EAT to consider together a range of findings and provide a more qualitative judgement on them. The EAT must also provide the main findings, commendations, recommendations and proposal for decision. Additionally, in the case of conditional accreditation, the report must explicitly indicate the conditions to be fulfilled and the implementation period. EATs are instructed to use language that can be easily understood by the public in general. The Agency has assessed the ratings of the quality of the reports in their survey feedback. For instance, the SAR highlights a recent report on the ACEF survey's results and improvement measures demonstrating that the quality of the external assessment reports was rated 3,53 in the scale 1-5 and only 7 out of 66 institutions (9%) assessed reports negatively.

Analysis

EAT reports are published online, easy to read and written in a professional way. The formal decisions of the Agency are published with the reports (in Portuguese). The panel heard of the efforts of the Agency to make the Reports more visible to the wider public, though the panel also received feedback that the visibility of the Agency needs to be heightened. The practice for publishing the details of the EAT within the reports is currently variable for different assessments. The recent ACEF reports include the greatest amount of detail with a hyperlink to each EAT member's biography, an approach that could be replicated in all reports.

A3ES has invested in a comprehensive IT platform which underpins the success of the reporting, particularly consistency and accessibility. The panel was impressed by the efficiencies that this system provides whereby responses from institutions and EATs are captured in fields rather than documents, which allows for the use of data for additional purposes (e.g. thematic reports) as well as the reuse of relevant data for future assessments. There are, however, drawbacks to this kind of approach, as the tendency is for EATs to provide simple yes/no responses, rather than more evaluative and qualitative statements which might be of more use to institutions.

The recent efforts to incorporate more qualitative global analyses in the reports is a move in a positive direction to provide more useful feedback to institutions for improvement and information of interest to a wider audience. The recently introduced global appraisal statements, for each thematic area and for the report overall, are commendable as a step in the right direction of this more evaluative and

improvement-oriented approach. The panel is satisfied that the introduction of these statements as well as the overall outcomes of the assessment and explicit information about conditions, coupled with the accessibility of the reports online, addresses the recommendation of the previous ENQA review, though the panel acknowledges that there is always more work to be done to publicise QA reports to wider audiences (while it should be noted that the interest of the wider public in quality assessment reports should not be overestimated).

As the importance of their institutional assessments grow, the Agency may wish to consider the development of summary reports and creating a space for institutional context in all reports, and through these actions as well as others, finding opportunities to further develop and build accountability and trust in the higher education system and, linked to this, wider visibility for the Agency.

Panel commendations

The panel commends the Agency for the introduction of global appraisal statements in its ACEF reports, for each thematic area and for the report overall. The panel would encourage the Agency to seek out opportunities to extend the practice of more qualitative EAT findings for programme and institutional assessments.

Panel conclusion: Fully compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

Evidence

The procedures for complaints and suggestions are published by A3ES[30]. Complaints are monitored by the Secretary-General, and then processed by the appropriate person in the Agency. There is a deadline of 20 working days from receipt of complaint to response. Each year the Agency compiles a summary report of complaints and suggestions. The summary reports indicate that most of the complaints are erroneous in nature in that they are complaints about institutions, or individual staff employed by HEI's, rather than about the processes of the Agency.

Based in Law, the formal structure of the Agency includes an Appeals Council, as the body for appeals of the assessment and accreditation decisions of the Management Board. The document Regulations of the Appeals Council and the Appeals Procedures[31], published on the website, set out the organisation and operation of this Council, its membership, as well as the procedures for reviewing decisions relating to the assessment and accreditation of higher education institutions and their study programmes. As set out in the SAR, The Appeals Council is composed of five members, appointed by

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[30] https://www.a3es.pt/en/about-a3es/quality-policy/complaints-and-suggestions

[31] https://www.a3es.pt/en/accreditation-and-audit/normative-framework/regulations-appeals-council-and-appeals-procedures

the Board of Trustees, all of whom are high-profile experienced professionals, including two international experts.

The SAR data on the outcomes of appeals from 2009-2017 demonstrates an overall low rate of appeals compared to the number of decisions taken by the Agency, and a gradual decline in appeals since the formation of the Agency. In interviews the panel heard that many potential appeals are dealt with directly by the Management Board before they reach the point of appeal, which leads, and are if justified and therefore necessary, to overturning the recommendations of an EAT before the case reaches the Appeals Council. The panel also heard that many appeals are frivolous and do not meet the criteria for appeal.

Analysis

The panel were satisfied that there is a robust and active appeals process in place. However, the clarity of the process is not helped by the archaic and, for the layperson and members of the Appeals Council who are not specialists in Portuguese law, confusing language in the Decree Law that gives it its foundation. The panel understands that the key criterion for admissible appeals and their success is stated in Article 22 of the Regulations of the Appeals Council and the Appeals Procedures, which reads that an appeal "may be based on the illegality or undisputed inconvenience of the decision of the Management Board or on the illegality of its omission". While the panel understands that this is a standard terminology in Portuguese administrative law which must be adhered to, such terminology requires interpretation for the benefit of those Appeals Council members who are not trained in Portuguese administrative law and equally for higher education institutions. The panel recognises that the Agency has attempted to improve interpretation by publishing decisions of the Appeals Council to assist HEI's by means of a 'case-law approach' in their understanding of the admissibility of appeals and the reasoning applied to appeals cases. The Agency has also provided their interpretation of the legal terminology in their *A3ES Reading Series* document *'Jurisprudence of the A3ES Appeals Council'*. Despite these initiatives, many appeals continue to be made without valid grounds. The panel also learned from its meetings that not everyone is fully au fait with the meaning of the aforesaid legal terminology. While the panel acknowledges that, as mentioned above, the Agency has provided information on the grounds for appeal, the panel suggests that the Agency, in as much as is in its remit, communicates the appeals criteria more prominently and in a way which is easily accessible and understood, for example by supplying a brief and readily digestible interpretation of the legal terminology in the Agency's published explanatory document for outlining the appeals criteria and process. This should help to reduce the incidences of invalid appeals whilst also ensuring that members of the Appeals Council are fully aware of the remit and limits of their authority to judge in appeal cases.

The Agency is fortunate to have the assistance of a selection of formidable international and national appeals assessors. Furthermore, the Agency, particularly the Management Board, actively seeks out ways to address issues before they reach the point of appeal. We understand from the assessors that over time the number of appeals has gradually reduced which is a healthy sign that the system functions well. Having said this, many of the appeals remain frivolous and often do not qualify technically as appeals, which indicates a lack of understanding and space to improve communications around this process.

In the case of complaints, the process is appropriate, and the Agency strives to resolve complaints in a transparent and timely way. Again, however, the panel heard that many of the complaints that are made to the Agency are misdirected as they are not complaints about the Agency process. The panel found that the complaints procedure of the Agency does not include a clear definition of what constitutes a reason for a complaint that falls within the remit of the Agency. In order to reduce the

number of complaints that do not fall within the responsibility of the Agency, the panel is of the opinion that the documents provided by the Agency should not only describe the complaints process but also the criteria of admissibility of complaints lodged with the Agency.

Suggestion for further improvement

As a means to reduce the number of invalid appeals and to clarify the remit of the Appeals Council, it is suggested that the Agency optimizes its approach to communicating the criteria for appeals and in so doing finds a way to communicate more widely a brief and readily digestible interpretation of the phrase, *"may be based on the illegality or undisputed inconvenience of the decision of the Management Board or on the illegality of its omission".*

The panel advises the Agency to provide a definition of what constitutes a complaint in its published complaints procedure in clear and simple text, thereby reducing the number of evidently groundless complaints.

Panel conclusion: Fully compliant

ADDITIONAL OBSERVATIONS

The panel would like to draw attention to two issues of significance which do not fall within the structure and criteria set by the ESG but are rather related to specific aspects of development currently visible or under discussion in the Portuguese system of tertiary education.

1. The panel recognises that the A3ES approach, or rather the national approach, to external quality assurance (and implicitly within that, internal quality assurance) has arrived at a pivotal point. The system is approaching a crossroads where there is an imminent decision required as to whether, or at least to what extent or under which circumstances, there should be a more open approach to institution-focused external quality assurance (under the proviso that internal quality assurance of HEI's has developed to a sufficient level of maturity). If a more open approach is selected, the legal system which underpins external quality assurance could or should openly and more broadly adopt a policy of "delegation of authority" for HEI's to self-accredit study programmes. This would not only help to streamline external quality assurance but also would foster institutional autonomy in terms of strengthening internal responsibility, quality management and quality culture. At present, A3ES is legally bound to carry out programme-related assessments, thus being able to step only timidly towards an institution-focused approach to quality assurance by means of implementing the new "lighter touch approach".

2. The panel heard that for valid, largely labour-market related reasons, the Portuguese educational system is pushing for a considerable expansion of Short Cycle tertiary education Level 5 programmes. While the panel understands the economic arguments for urgency, and that the Decree Law 38/2007 provides for the external quality assessment by the Ministry of these programmes every 4 years, the panel advises that the Ministry ensure that this rapid expansion is accompanied by a fit for purpose, robust external quality assurance system. Without this, the Portuguese system could run the risk of repeating the difficulties that emerged from the rapid expansion of HE in the post-1974-revolution period. Given the experience of A3ES in organising and, indeed, reforming quality in large-scale expansion contexts, the panel would encourage the use of the expertise of the agency in planning and managing this rapid expansion and ensuring a robust external quality assurance process. This could also subsequently lead to enabling better recognition by HEI's for the prior learning efforts of graduates of these programmes if they seek entry to bachelor programmes. From the perspective of A3ES, the question arises whether the agency should assume responsibility for safeguarding quality in this additional area, which is currently not within their span of control. The panel realises that this would place yet another considerable burden on the Agency, which could only be managed with additional resources, including staff.

CONCLUSION

The way the Agency has ensured that every assessment team has an international expert, thereby strengthening the external perspective of the team (ESG 2.4).

The innovative approach of the Agency to the selection and training of students (ESG 2.4).

The introduction of global appraisal statements in its ACEF reports, for each thematic area and for the report overall. The panel would encourage the Agency to seek out opportunities to extend the practice of more qualitative EAT findings for programme and institutional assessments (ESG 2.6).

The admirable foresight in the provision of endowment and start-up funds to the Agency on establishment as this has ensured financial stability and independence (ESG 3.3 and 3.5).

The analysis of quality assurance work conducted by A3ES through its Summary Thematic Studies, Activity Reports and other occasional studies and reports (ESG 3.4).

The high value placed on research by A3ES and the ways in which the Agency uses its own and others' research to inform and improve practice (ESG 3.4).

The way the Agency has opened up its work to the scrutiny of a Scientific Council of international experts to deliberate upon the organisation and its processes and make recommendations for developing and improving them (ESG 3.6).

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 2.1 – Fully compliant

ESG 2.2 – Fully compliant

ESG 2.3 - Fully compliant

ESG 2.4 – Substantially compliant

Panel Recommendation
Aside from the use of student reviewers, the Agency has interpreted the concept of a peer reviewer in an academic sense i.e. subject-matter expertise, and this is not fully aligned to the purposes of their assessments, particularly institutional assessments. The panel recommends that the Agency takes a wider interpretation, aligned to the explanation of the concept of peer reviewer in the Guidelines for ESG 2.4. In so doing, the existing network of institutional quality assurance officers provides a group with expertise that might prove useful for institutional assessments.

ESG 2.5 – Substantially compliant

Panel recommendations

That the Agency uses Article 25 of the Regulations as the basis for providing a range of overarching criteria to complement the existing specific criteria and give greater scope for their interpretation in different contexts.

That A3ES clarify the distinct purposes of their criteria and guideline statements, and, arising from this, reformulate a series of separate but complementary guideline and criteria statements.

ESG 2.6 - Fully compliant

ESG 2.7 – Fully compliant

ESG 3.1 - Fully compliant

ESG 3.2 - Fully compliant

ESG 3.3 - Fully compliant

ESG 3.4 - Fully compliant

ESG 3.5 - Fully compliant

ESG 3.6 - Fully compliant

ESG 3.7 - Fully compliant

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, A3ES is in substantial compliance with the ESG.

SUGGESTIONS FOR FURTHER DEVELOPMENT

ESG 2.1

That in order to support the maturing quality assurance procedures of higher education institutions and the development of an attendant comprehensive analysis by External Assessment Teams, the Agency should consider ways in which it can provide higher education institutions and External Assessment Teams with a complete set of references to consider in the quality assurance process by including, and where necessary, repeating standards and criteria that are also provided for in legislation thereby allowing for their development and interpretation over time.

That the Agency considers making more explicit in its documents the four overarching educational objectives formulated by the Council of Europe, endorsed in the Bologna Process and included in the ESG Guidelines under ESG 2.1., in order to draw attention of higher education institutions and External Assessment Teams to the full breadth of the remit of higher education.

ESG 2.2

That the Agency undertakes a harmonisation project to streamline documents and in so doing make explicit the guidelines and criteria that are relevant to each assessment process.

That the Agency reviews the Assessment Handbook and retains the relevant elements that apply to *all* its procedures as an important underpinning document for the work of the Agency.

ESG 2.4

That the Agency considers the extension of some of the successful strategies employed for the selection and training of students and international experts to the selection and training of other experts. Worthy of extension are the open call model for selection, the online tutorial, currently

available to international experts, and the interview simulation approach currently available to student evaluators.

ESG 2.7

As a means to reduce the number of invalid appeals and to clarify the remit of the Appeals Council, it is suggested that the Agency optimizes its approach to communicating the criteria for appeals and in so doing finds a way to communicate more widely a brief and readily digestible interpretation of the phrase, *"may be based on the illegality or undisputed inconvenience of the decision of the Management Board or on the illegality of its omission".*

The panel advises the Agency to provide a definition of what constitutes a complaint in its published complaints procedure in clear and simple text, thereby reducing the number of evidently groundless complaints.

ESG 3.1

That the Agency builds on its existing work with stakeholders to find a way of harnessing and engaging more directly, in both panels and governance, the experience of the network of quality assurance officers of higher education institutions.

ANNEXES

Annex 1: Programme of the site visit

Day 0 25.02.2018 (at Hotel Lutécia)		
14:00 - 18:00	Review panel's private meeting (Meeting with the liaison person, if requested)	*Review panel only*
20.00	*Dinner*	*Review panel only*

Day 1 26.02.2018 (at A3ES's Offices)		
08:45 – 09:00	*Review panel's private meeting*	*Review panel only*
09:00 – 10:15	**Session 1** Meeting with the Management Board of A3ES	Alberto Amaral, *Chairman* Jacinto Jorge Carvalhal, *executive member* João Duarte Silva, *executive member* Sérgio Machado dos Santos, *executive member* José Sarsfield Cabral, *non-executive member* Maria Teresa Duarte, *non-executive member* Armando Pires, *non-executive member*
10:15 – 10.45	*Coffee break with internal review panel discussion/incl. 15 min buffer time, if needed, for extending previous meeting*	*Review panel only*
10.45 – 11.45	**Session 2** Meeting with the Board of Trustees	Manuel Sobrinho Simões, *Chairperson* Dionísio Afonso Gonçalves Eduardo Marçal Grilo Lígia Queiroz Amâncio
11.45 – 12.00	*Coffee break with internal review panel discussion*	*Review panel only*
12.00 – 12.45	**Session 3** Meeting with A3ES Secretary General	Madalena Fonseca, *Secretary General*
12.45 – 14.00	*Lunch* *Internal review panel discussion*	*Review panel only*

13.45 – 14.00	*Transfer to the Ministry*	
14.00 – 15.30	**Session 4** Meeting with A3ES staff	Cristina Sin, *Office of Research and Analysis* Orlanda Tavares, *Office of Res. and Analysis* Fernando Campos, *Project Manager* Lucília Mata, *Project Manager* Paula Fonseca, *Project Manager* Raquel Santos, *Project Manager*
15.30 – 16.30	*Coffee break with internal review panel discussion*	*Review panel only*
16.30 – 17.30	**Session 5** Meeting with representatives of Higher Education Institutions	Rui Vieira de Castro, *Council of Rectors of Portuguese Universities (CRUP)* Pedro Dominguinhos, *President of the Coordinating Council of Portuguese Polytechnics (CCISP)* João Redondo, *President of the Portuguese Association of Private Higher Education Institutions (APESP)*
17.30 – 18.00	*Transfer to the Ministry*	
16:30 – 17:30	**Session 6** Meeting with the Minister for Science, Technology and Higher Education	Manuel Heitor, *Minister for Science, Technology and Higher Education*
20.00	*Dinner*	*Review panel only*

Day 2 27.02.2018 (at A3ES's Offices)		
09.00 – 10.30	**Session 7** Meeting with members of External Assessment Teams (EAT)	António Cachapuz, *President of EAT for Education / Teacher Training* Arminda Costa, *President of EAT for Nursing + EAT for Institutional Assessment* José Miguel Urbano, *President of EAT for Mathematics* Luís Vicente Baptista, *President of EAT for Sociology*

		Ana Sofia Rodrigues, *member of the Audit Team + EAT for Institutional Assessment*
		Maria Inês Ruivo, *member of EAT for Design*
		Ivânia Tavares, *student, member of EAT for Law*
		Samuel Vilela, *student, member of the Audit Team*
		Jesper Larsen, *foreign expert, member of EAT for Industrial Engineering and Management*
10.30 – 10:45	*Coffee break with internal review panel discussion*	*Review panel only*
10:45 – 11:45	**Session 8** Meeting with students' representatives	Bruno Alcaide, *member of the Advisory Council, university sector* Bruno Fragueiro, *former member of the Advisory Council, polytechnic sector* Hugo Soares, *public university sector* Inês Silva, *public polytechnic sector* Catarina Rego, *private university sector* Carlos Sousa, *private polytechnic sector* Tiago Diniz, *President of the National Federation of Polytechnic Students' Unions (FNAEESP)*
11:45 – 12:00	*Coffee break with internal review panel discussion*	*Review panel only*
12:00- 13:00	**Session 9** Meeting with quality assurance officers of HEIs	Isabel Mourato, *Head of Evaluation and Quality Office, Polytechnic Institute of Portalegre* Rita Monteiro, *Quality Assurance and Assessment Office, University of Lisbon* Sílvia Santos, *Head of the Evaluation and Continuous Improvement Unit, University of Coimbra*
13:00-14:00	*Lunch* *Internal review panel discussion*	*Review panel only*
14:00 – 15:00	**Session 10** Meeting with the Appeals Council	João Martins e Silva Andrée Sursock
15:00 – 15:15	*Coffee break with internal review panel discussion*	*Review panel only*

15:15 – 16:00	**Session 11** Meeting with the Advisory Council	Adriano Pimpão, *Chairperson, Representative of the Portuguese Association of Economists (Ordem dos Economistas)* Carlos Loureiro, *Representative of the Portuguese Association of Engineers (Ordem dos Engenheiros)* Daniel Oliveira, *Representative of the Portuguese Business Confederation* João Cunha Serra, *Representative of the General Confederation of Portuguese Workers*
16:00 – 17:00	**Session 12** Meeting with Secretary General, Chair of the Management Board and review liaison for additional clarifications	Alberto Amaral Madalena Fonseca Sérgio Machado dos Santos
17:00 – 18:30	*Review panel meeting to summarize outcomes of day two and of overall findings*	*Review panel only*
20:00	*Dinner*	*Review panel only*

Day 3 28.02.2018 (at A3ES's Offices)		
08:45 – 09:15	**Session 13** Conference call with a member of the Scientific Council	Chair Bjørn Stensaker
09:15 – 09:30	**Session 14** Presentation of the A3ES IT platform	Alberto Amaral João Duarte Silva
09:30 - 11:45	*Coffee break* *Final discussion of review panel to agree outcomes and to discuss main lines of the report*	*Review panel only*
11:45 – 12:30	**Session 15** Final meeting with the Management Board	Alberto Amaral Jacinto Jorge Carvalhal João Duarte Silva Sérgio Machado dos Santos José Sarsfield Cabral Maria Teresa Duarte Armando Pires

13:00	*Lunch*	

External review of the Agency for Evaluation and Accreditation of Higher Education (A3ES) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

March 2018

1. Background and Context

The "Agência de Avaliação e Acreditação do Ensino Superior" (Agency for Assessment and Accreditation of Higher Education - A3ES) is a private law foundation established by Decree-Law no. 369/2007, of 5th November 2007, aiming at promoting and ensuring the quality of higher education.

The assessment and accreditation regime developed by the Agency is defined in Law no. 38/2007, of 16th August 2007.

The mission of A3ES is to contribute for the improvement of the quality of Portuguese higher education, through the assessment and accreditation of higher education institutions and their study cycles.

A3ES promotes the improvement of the performance of higher education institutions and their study cycles and guarantees the fulfilment of basic requirements for its official recognition. These general objectives are pursued through the assessment and accreditation activities carried out by the Agency, aiming at developing an internal quality assurance culture in every higher education institution.

Therefore, the objectives of A3ES are:

- To develop the quality assessment of the performance of higher education institutions and their study cycles;
- To substantiate the accreditation criteria, in order to translate them into qualitative appreciations, as well as to define the consequences of evaluation for the operation of study cycles and institutions;
- To promote the accreditation of study cycles and institutions, aiming at ensuring the fulfilment of the legal requirements for their recognition;
- To provide society with information on the quality of the performance of higher education institutions;
- To promote the internationalisation of the assessment process.

A3ES was evaluated by ENQA in 2014 according to the ESG and has been a full member of ENQA since June 2014, and is applying for ENQA renewal of membership.

A3ES has been registered on EQAR since November 2014. This review will also be used for applying for EQAR renewal of registration.

2. Purpose and Scope of the Evaluation

This review will evaluate the way in which and to what extent A3ES fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether membership of A3ES should be reconfirmed.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of A3ES within the scope of the ESG

In order for A3ES to apply for renewal of ENQA membership and for renewal of registration in EQAR, this review will analyse all activities of A3ES that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of A3ES have to be addressed in the external review:

- Prior accreditation of new study programmes in Portugal;
- Assessment/accreditation of study programmes in operation;
- Institutional Assessment;
- Audit/certification of internal quality assurance systems.

3. The Review Process

The process is designed in the light of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by A3ES including the preparation of a self-assessment report;
- A site visit by the review panel to A3ES;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow up of the panel's and/or ENQA Board's recommendations to the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel

at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

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

ENQA will provide A3ES with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the A3ES review.

3.2 Self-assessment by A3ES, including the preparation of a self-assessment report

A3ES is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which A3ES fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the ENQA Guidelines for External Review of Quality Assurance Agencies, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

A3ES will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to A3ES at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by A3ES in arriving in Lisbon, Portugal.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language, and it will be then submitted to A3ES within 11 weeks of the site visit for comment on factual accuracy. If A3ES chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by A3ES, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and should be around 40 pages in length (excluding essential annexes).

A3ES is also requested to provide a letter addressed to the ENQA Board outlining its motivation in applying for membership and the ways in which A3ES expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

A3ES will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. A3ES commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by A3ES. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.
The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether A3ES has met the ESG and can thus be reconfirmed as a member of ENQA. The report may also be used for other purposes, such as registration in EQAR, and is designed to serve these two purposes.

However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to A3ES and ENQA and until the decision by the Board is made, the report may not be used or relied upon by A3ES, the panel and any third party and may not be disclosed without the prior written consent of ENQA. A3ES may use the report at its discretion only after the Board has approved the report. The approval of the report is independent of the decision on membership.

Should the review report be used for applying to the European Quality Assurance Register for Higher Education (EQAR), the Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

A3ES shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excluded for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, A3ES will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget and will refund the difference to A3ES if the travel and subsistence expenses are under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs, are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	March 2018
Appointment of review panel members	June 2018
Self-assessment completed	October 2018
Pre-screening of SAR by ENQA coordinator	November 2018
Preparation of site visit schedule and indicative timetable	December 2018
Briefing of review panel members	January 2019
Review panel site visit	February 2019

Draft of evaluation report and submission to ENQA coordinator for pre-screening	March 2019
Draft of evaluation report to A3ES	April 2019
Statement of A3ES to review panel if necessary	May 2019
Submission of final report to ENQA	May 2019
Consideration of the report by ENQA Board and response of A3ES	June 2019
Publication of report	July 2019

ANNEX 3: GLOSSARY

> *This section provides an alphabetical listing of the abbreviations mentioned in the report, to be written out in their first use in the text and abbreviated each time thereafter. This box to be deleted before publishing.*

ENQA	European Association for Quality Assurance in Higher Education
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area*, 2015
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report

…

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY A3ES

Main legal diplomas

- *LAW 38/2007*, of 16 August (Legal framework for the assessment of higher education)
- *LAW 62/2007*, of 10 September (RJIES – Legal framework for higher education institutions)
- *DECREE-LAW 369/2007*, of 5 November (Creates A3ES and endorses its Statutes)
- *DECREE-LAW 74/2006*, amended and republished by *DECREE-LAW 65/2018*, of 16 August (Regulates the organisation of degrees and its adaptation to the Bologna process)

Norms and regulations

– *REGULATIONS ON THE ASSESSMENT AND ACCREDITATION PROCEDURES*
– *REGULATIONS OF THE APPEALS COUNCIL AND APPEALS PROCEDURES*
– *NORMS FOR THE APPOINTMENT AND CONDUCT OF THE EXTERNAL ASSESSMENT TEAM*
– *CODE OF ETHICS*

Manuals and criteria

– *ASSESSMENT HANDBOOK*
– *SIMPLIFIED ASSESSMENT HANDBOOK*
– *MANUAL FOR THE AUDIT PROCESS* (it includes, as an annex, the *REFERENCE FRAMEWORK FOR INTERNAL QUALITY ASSURANCE SYSTEMS IN HIGHER EDUCATION INSTITUTIONS*)
– *MANUAL FOR INSTITUTIONAL ASSESSMENT*
– *QUALITY MANUAL*
– *QUALIFICATION CRITERIA FOR TEACHING STAFF*

Plans and reports

– *STRATEGIC PLAN*
– *QUALITY POLICY STATEMENT*
– *ACTIVITY PLAN 2018*
– *ACTIVITY REPORT 2017*
– *REPORTS OF THE SCIENTIFIC COUNCIL*
– *REPORT OF SCIENTIFIC COUNCIL – JUNE 2017*
– *REPORT OF SCIENTIFIC COUNCIL – OCTOBER 2015*
– *REPORT OF SCIENTIFIC COUNCIL – OCTOBER 2014*
– *REPORT OF SCIENTIFIC COUNCIL – NOVEMBER 2013*
– *REPORT OF SCIENTIFIC COUNCIL – OCTOBER 2012*
– *REPORT OF SCIENTIFIC COUNCIL – FEBRUARY 2011*
– *REPORT OF SCIENTIFIC COUNCIL – DECEMBER 2009*

Guidelines for prior accreditation of new study programmes

– *GUIDELINES FOR REQUESTING PRIOR ACCREDITATION OF NEW STUDY PROGRAMMES*
– *GUIDELINES FOR PRIOR ACCREDITATION OF NEW STUDY PROGRAMMES*

Guidelines for assessment/accreditation of study programmes in operation

– *GUIDELINES FOR SELF-ASSESSMENT OF STUDY PROGRAMMES IN OPERATION*
– *GUIDELINES FOR EXTERNAL ASSESSMENT/ACCREDITATION OF STUDY PROGRAMMES IN OPERATION*
– *GUIDELINES FOR INSTITUTIONAL ASSESSMENT*
– *GUIDELINES FOR INSTITUTIONAL SELF-ASSESSMENT* (Polytechnic Education)
– *GUIDELINES FOR INSTITUTIONAL SELF-ASSESSMENT* (University Education)
– *GUIDELINES FOR EXTERNAL INSTITUTIONAL ASSESSMENT* (Polytechnic Education)
– *GUIDELINES FOR EXTERNAL INSTITUTIONAL ASSESSMENT* (University Education)

Guidelines for auditing internal quality assurance systems

– *GUIDELINES FOR SELF-ASSESSMENT OF INTERNAL QUALITY ASSURANCE SYSTEMS*
– *GUIDELINES FOR AUDITING INTERNAL QUALITY ASSURANCE SYSTEMS*

Results

– *ACCREDITATION PROCESS RESULTS* (available in Portuguese only)
– *REPORTS ON THE SURVEYS' RESULTS AND IMPROVEMENT MEASURES* (available in Portuguese only)

OTHER SOURCES USED BY THE REVIEW PANEL
– *PERA PROCEDURE*
– *THEMATIC STUDIES*
– *SURVEY RESULTS AND IMPROVEMENT MEASURES*
– *COMPARATIVE ANALYSIS OF EUROPEAN PROCESSES FOR ASSESSMENT AND CERTIFICATION OF INTERNAL QUALITY ASSURANCE SYSTEMS 2011*
– *THE PORTUGUESE SYSTEM OF QUALITY ASSURANCE – NEW DEVELOPMENTS AND EXPECTATIONS (ROSA, SANTOS, CARDOSO AND AMARAL, EQAF, 2010)*
– *ACTIVITY PLAN 2019*
– *COMPLAINTS AND SUGGESTIONS PROCEDURE*

THIS REPORT presents findings of the ENQA Agency Review of the Agency for Evaluation and Accreditation of Higher Education (A3ES), undertaken in 2019.

ENQA

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e Acreditação
do Ensino Superior

2019 ENQA AGENCY REVIEW