

The National Action Plan on Ukrainian external higher education quality assurance for 2024-2026 period



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1, Borysa Hrinchenka Street, Kyiv, 01001, Ukraine

Authors: The National Agency for Higher Education Quality Assurance

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1. List of abbreviations

CMU - the Cabinet of Ministers of Ukraine

ECTS - European Credit Transfer and Accumulation System

EHEA – the European Higher Education Area

ENQA – the European Association for Quality Assurance in Higher Education

EQAR – the European Quality Assurance Register for Higher Education

ESG 2015 – the Standards and guidelines for quality assurance in the European Higher Education Area

HEI – Higher education institution

NAQA –the National Agency for Higher Education Quality Assurance

QA – Quality assurance

SEC – Sectoral expert council

SEQA-ESG 2 - Supporting European QA Agencies in Meeting the ESG 2

UAS – Ukrainian Association of Students

2. Introduction

The National Action Plan on Ukrainian external higher education quality assurance for the 2024-2026 period (hereinafter Action Plan) was developed as a part of the Supporting European QA Agencies in Meeting the ESG (SEQA-ESG) 2 project that is coordinated by the European Association for Quality Assurance in Higher Education (ENQA). The project is co-financed by the European Commission in the framework of a call for Initiatives to support the implementation of European Higher Education Area (EHEA) reforms. The duration of the project is December 2022 – November 2025. SEQA-ESG 2 main aim is to provide in-depth, targeted peer support to four countries that have already established a quality assurance agency. SEQA-ESG II is supporting EHEA members outside the EU facing similar issues and challenges related to external QA. The five agencies included in the project, currently ENQA affiliates, do not yet have operations fully aligned with the ESG and need support to reach ESG compliance. The National Agency for Higher Education Quality Assurance (hereinafter NAQA) has become a project partner.

NAQA had the National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 period and reported on its implementation to the experts and head representatives of ENQA and EQAR during the National Peer Counselling Meeting in February 2024 within the framework of the SEQA-ESG 2 project. As a result of the meeting, further steps of NAQA development in the direction of full compliance with the requirements for ENQA and EQAR full membership were determined. This served as the basis for the development of the Action Plan for 2024-2026.

The elaboration of the Action plan started in February 2024 right after the National Peer Counselling Meeting. This National Action Plan was developed together with NAQA Secretariat employees, NAQA Board members and all relevant stakeholders. It was approved during NAQA strategic session, which took place in spring 2024.

3. Country's higher education system

Higher education institutions of state, municipal or private ownership forms, have equal rights in carrying out educational, scientific and other activities. The major types of higher education institutions are: university (multidisciplinary or sectoral), academy or institute (sectoral), college.

Levels and degrees (qualifications) of higher education.

Training of specialists with higher education is carried out according to the relevant study programmes at the following levels of higher education:

- initial level (short cycle) of higher education (120 ECTS credits);
- first (bachelor) level, professional study, academic study, creative study programme (180-240 ECTS credits);
- second (master) level (obtained under the study-professional (90-120 ECTS credits) or under the academic study (120 ECTS credits) programme);
- third (academic study/ creative study) level (volume of the educational component of the academic study programme of Doctor of Philosophy training is 30-60 ECTS credits, the educational component of the creative study programme of Doctor of Arts training is 30-60 ECTS credits).

Acquisition of higher education at each level of HE presupposes the successful implementation of the relevant study programme, which is the basis for awarding the appropriate degree of HE:

- Junior Bachelor;
- Bachelor;
- Master;
- Doctor of Philosophy/Doctor of Arts;
- Specialist.

According to the information from the Unified State Electronic Database on Education (hereinafter USEDE), as of January 1, 2024, 633 institutions (121 separate structural units) provide educational services at junior bachelor, bachelor, masters, PhD, specialist levels. It is worth noting that the list includes 5 institutions that were temporarily blocked as of January 1, 2024. 444 institutions are state, 147 are private and 42 – municipal.

By category, educational institutions which implement study programmes in the field of higher education are divided as follows: 394 — higher education institutions, 55 — institutions of professional pre-higher education, 184 — scientific institutes.

Study fields and specialties.

According to the national legislation of Ukraine, the field of study is a broad subject area of education and science harmonized with the International Standard Classification of Education, which includes a group of related specialties. The specialty is a subject area of education and science harmonized with the International Standard Classification of Education, which combines related study programmes that provide common requirements for the competencies and learning outcomes of graduates. The list of fields of study and specialties is approved by the Cabinet of Ministers of Ukraine on the proposal of the Ministry of Education and Science of Ukraine. As of today, there are 29 fields of study and 121 specialties in Ukraine.

Study programmes.

Study (professional study, academic study, creative study) programme – is a unified set of educational components aimed at achieving the learning outcomes provided by such a programme, which gives the right to receive certain educational or educational and professional qualification (qualifications).

The study programme should contain: a list of educational components, their logical sequence, requirements for the level of education of persons who can start training under this programme, the number of ECTS credits required to complete this programme and the expected programme learning outcomes (competencies) that the student must master.

The document on higher education (diploma) is issued by a HEI only for a study programme accredited in accordance with the legislation. Accreditation of study programmes is carried out by NAQA. Ukraine also recognizes certificates of study programmes accreditation issued by foreign accreditation agencies or HE QA agencies, the list of which is approved by the Cabinet of Ministers of Ukraine.

License Terms for educational activities.

Educational activities in the higher education field are carried out by HEIs, institutions of professional higher education (specialists of junior bachelor's and bachelor's degrees training) and academic institutions (training of masters and/or doctors of philosophy) on the basis of licenses issued by the central executive body in the field of education and science, in accordance with the legislation of Ukraine.

In the higher education, the following are subject to licensing:

- educational activity of a HEI at a certain level of higher education;
- educational activities under study programmes that provide the assignment of professional qualifications in professions where additional regulation has been introduced.

During licensing, the ability of an educational institution to conduct educational activities in accordance with the requirements determined by the License Terms is identified.

License Terms for educational activities determine the following:

- 1) personnel requirements for employees who have a certain educational and / or professional qualification;
- 2) technological requirements for the availability of certain material and technical base together with the data that allow its confirmation.

Governing bodies in the field of higher education.

Management in the field of HE within its powers is carried out by:

- 1) the Cabinet of Ministers of Ukraine;
- 2) the central executive body in the field of education and science;
- 3) sectoral state bodies, which manage institutions of higher education;
- 4) authorities of the Autonomous Republic of Crimea and local governments, which manage higher education institutions;
- 5) the National Academy of Sciences of Ukraine and the national branch academies of sciences;
- 6) founders of higher education institutions;
- 7) public self-governing bodies in the field of higher education and science;
- 8) National Agency for Higher Education Quality Assurance.

Stakeholders in the educational process.

Stakeholders in the educational process are the following:

- scientific, academic and pedagogical staff;
- higher education students and other persons studying in HEIs;
- practitioners involved into the educational process in professional study programmes;
- other employees of HEIs.

4. Quality assurance of higher education in the country

4.1 Legal framework

The Law of Ukraine No. 1556-VII “On Higher Education” of 01.07.2014 and the Charter of the National Agency for Higher Education Quality Assurance (hereinafter, the Charter) approved by Decree No. 244 of the Cabinet of Ministers of Ukraine of April 15, 2015 (as amended by Law No. 1369-IX dated 30.03.2021) define NAQA as a permanent collegial body. Corresponding amendments to the Article 17 of the Law of Ukraine "On Higher Education" dated March 30, 2021, clarify the official status of NAQA. Therefore, the requirement for NAQA establishment and functioning, the procedure for its formation and basic powers are determined by a law approved by the Parliament, and NAQA Charter was approved by the Government.

As of April 2024, NAQA is the only national body in Ukraine that is designated by the state as an accreditation body. In accordance with the Amendments to the Law of Ukraine “On Higher Education” dated May 2, 2023, NAQA is empowered to develop the Regulations on accreditation of independent institutions for higher education quality assurance and assessment. The independent institutions for higher education quality assurance and assessment will conduct study programme assessment in Ukraine. According to the Law on Higher Education NAQA is empowered to accredit such independent institutions for higher education quality assurance and assessment and manage a register of these institutions. Having a register of independent institutions for higher education quality assurance and assessment will allow the Ukrainian higher education quality assurance system be even more transparent. In addition, since the beginning of NAQA work, the number of registered accreditation cases in NAQA IT System is 9386 as of April 2024. On March 27, 2024, the 1000th accreditation case for 2024 was registered. The number of accreditation cases is high and there is a need for independent higher education quality assurance agencies to assess all study programmes.

The issue of institutional accreditation is also important in Ukrainian higher education area. The need for institutional accreditation is reasoned to the request of both national and foreign stakeholders. In particular, in connection with the full-scale invasion of Russian Federation on the territory of Ukraine, a large number of Ukrainians were forced to leave the country. Some countries cannot recognize Ukrainian diplomas, citing the lack of institutional accreditation. With the amendments to the Law of Ukraine “On Higher Education” dated May 2, 2023, which were initiated by NAQA, the agency is also empowered to develop the Regulation on Institutional Accreditation and conduct institutional accreditations.

The current legislation of Ukraine contains norms aimed at ensuring NAQA independence and compliance with ESG-2015 standards.

Organisational independence

According to the Law “On Higher Education” of 2014 and in accordance with the amendments to the Law of Ukraine "On Higher Education" NAQA is a permanent collegial body (legal entity under public law) independent in the exercise of its powers from third parties such as higher education institutions, government, and other stakeholder organizations. Independence from the Government (Cabinet of Ministers of Ukraine) and the relevant ministry (Ministry of Education and Science of Ukraine) is ensured by the procedure of NAQA formation. The organization and conduct of competitive selection of NAQA members is entrusted to an International Competition Commission, which is formed by the Cabinet of Ministers of Ukraine as an advisory body. The competition commission consists of nine persons: four international representatives are delegated from the European Higher Education Area

and one representative each from the Ministry of Education and Science of Ukraine, the joint representative body of all-Ukrainian associations of employers' organizations, the National Academy of Sciences of Ukraine, the National Academy of Pedagogical Sciences of Ukraine, and the National Association of Students of Ukraine, which is a member of the European Students' Union (ESU). The terms of the competition are formed in such a way that NAQA must include representatives of all Ukrainian associations of employers' organizations, higher education students of the first or second level, the National Academy of Sciences of Ukraine, national branch academies of sciences and higher education institutions of public, municipal and private ownership.

The winners of the competition are approved by the Cabinet of Ministers of Ukraine as NAQA Board members. This approval is quite formal and required in order to legitimate NAQA Board.

NAQA consists of 23 members, including 12 representatives of state higher education institutions, 1 representative of a municipal higher education institution, 1 representative of a private higher education institution, 6 representatives of national academic institutions, 3 employers and 2 representatives of students. NAQA Management Board is composed of 5 members, including NAQA Head and 4 Vice Heads, they are also included in the list of NAQA Board members.

According to the Charter, Head and Vice Heads of NAQA are elected at the first meeting of NAQA for a term of three years.

The Head and Vice Heads of NAQA are appointed and dismissed by the Cabinet of Ministers of Ukraine at the request of NAQA and work on a permanent basis.

In accordance with the amendments to the Law on Higher Education, adopted on May 2, 2023, the Appeals Chamber is being established as part of the National Agency for Higher Education Quality Assurance.

The maximum number of NAQA Secretariat was 67 employees. In accordance with Resolution of the Cabinet of Ministers of Ukraine No. 376 dated April 2, 2024, the amendments were made to the paragraph 2 of the Resolution of the Cabinet of Ministers of Ukraine No. 567 dated July 27, 2016 "Some issues of the activities of the National Agency for Higher Education Quality Assurance". According to the Resolution, the maximum number of NAQA employees was approved in the amount of 92 people. In accordance with the Regulations on the Secretariat of the National Agency for Higher Education Quality Assurance, the Head of NAQA Secretariat is appointed to the position by the Head NAQA based on NAQA decision for a period of five years with the right of re-appointment. NAQA members cannot hold a post of the Head of NAQA Secretariat, Vice Head of NAQA Secretariat, or employees of the Secretariat. The same person cannot be the Head of Secretariat for more than two terms.

Operational independence

NAQA operational independence is established through legislative and regulatory measures, which outline its mandate, functions and governance structure. NAQA is fully independent in managing NAQA Secretariat staff. NAQA independently employs appropriate candidates based on present requirements and objectives. The main areas of responsibility of NAQA Secretariat include organizational, financial management, material-technical, information-reference, legal, expert-analytical, and other supportive activities for NAQA. It also creates appropriate conditions for the work of NAQA Board, ensuring the preparation and carrying out Board meetings, and ensure communication with government bodies and the public.

Experts for study programmes accreditation are appointed based on their inclusion in the NAQA registry, considering their subject area, absence of conflicts of interest, and their availability to participate in the procedure. The selection and management of the register of experts is carried out in accordance with the Procedure for the selection and management of the register of experts of the National Agency for Higher Education Quality Assurance for study programmes accreditation. Such appointments are conducted independently and are publicly disclosed on the NAQA's website, independently from external influences.

Independence of formal outcomes

The expert group consists of at least three members, where one is the representative of students. The expert from the number of employers can be included as the additional expert. SEC includes representative of students, employers, international expert and scientific-pedagogical/ pedagogical staff. Before the approval of the decision on accreditation at NAQA meeting, the expert report is submitted to the SEC for analysis and preparation of the SEC report, which should contain a justified proposal for the adoption by NAQA of the decision on accreditation. NAQA grants approval to the conclusive results of quality assurance procedures. Experts are notified that their involvement is on an individual basis and doesn't signify representation of their HEIs and institutions while working with NAQA. During the formation of expert panels and in order to avoid a conflict of interests, specialists of the Expert Support Department of NAQA Secretariat are guided by the main criteria for the formation of expert panels. For instance, the experts do not work/study and have not worked/studied for at least 5 years in the HEI in which accreditation will be conducted. The experts do not work/study at the same HEI and have not worked/studied together for the past 5 years. The expert is not a relative or a close person and has no other private interest in the person who is studying or working on study programme or other scientific and pedagogical staff involved in the implementation of the accredited study programme, the founder, head or deputy head of the relevant higher education institution. Accreditation determinations rely entirely on expertise, a principle explicitly outlined in the regulatory papers.

4.2 Stakeholder engagement

All work of NAQA is based on the principles of trust and cooperation. NAQA actively cooperates with all stakeholders, holds meetings, round tables, consultations, discussions, webinars and seminars, holds conferences. NAQA conducts surveys involving all stakeholders. NAQA publicly reports to the public, holds open online meetings that all stakeholders can join.

It is worth to be noted, that 3 representatives of employers and 2 students are NAQA Board members. NAQA actively cooperates with employers within the framework of signed memorandums, joins employers' QA initiatives and involves them in quality assurance processes, including working groups, round tables, events. NAQA also actively cooperates with student unions. NAQA representatives participate as speakers in events organized by student unions, and students often take part in events and joined events of NAQA.

In connection with security circumstances, because of full-scale invasion of Russian Federation on the territory of Ukraine, NAQA suspended face-to-face events for stakeholders for a certain time. In 2023, it was decided to gradually resume live meetings. Thus, NAQA held a number of round tables, regional seminars, QA forum and other face-to-face meetings with rectors, teachers, study programme leaders, students, employers and other stakeholders.

4.3 National/agency criteria in external quality assurance

According to the Law of Ukraine “On Higher Education” the external quality assurance system of educational activities and quality of higher education in HEIs must ensure the availability of published decision-making criteria in line with ESG-2015. NAQA is responsible for development of criteria for assessing the quality of educational activities of HEIs in Ukraine.

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
<p>1.1 Policy for quality assurance</p> <p>Institutions should have a policy for QA that is made public and forms part of their strategic management.</p> <p>Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.</p>	<p>Criterion 5. Control measures, evaluation of students and academic integrity.</p> <p>5.4 Clear and easy-to-understand policies, standards and procedures are established at the higher education institution to observe academic integrity, and are consistently observed by all participants of the educational process during realization of the study programme. The higher education institution promotes academic integrity (firstly, through the implementation of such policies for the development of an internal quality culture) and uses relevant technological solutions as instruments to counteract violations of academic integrity.</p> <p>Criterion 8. Internal quality assurance of the study programme.</p> <p>8.1 The higher education institution consistently observes its established procedures for development, approval, monitoring and periodic review of the study programme.</p> <p>8.2 Students, directly and through student governance bodies, are engaged as partners in the process of periodic review of the study programme and in procedures related to its quality assurance. The position of students is taken into consideration in reviewing the study programme.</p> <p>8.3 Employers, directly and/or through their associations, are engaged as partners in the process of periodic review of the study programme and other procedures related to its quality assurance.</p> <p>8.4 A practice exists to collect, analyze and take into consideration information about the career path of graduates of the study programme.</p> <p>8.5 The quality assurance system of the higher education institution ensures reaction to shortcomings identified in the study programme and/or educational activities related to the realization of the study programme.</p> <p>8.6 The results of external higher education quality assurance (in particular, comments and suggestions formulated during previous accreditations) are taken into account during reviews of the study programme.</p> <p>8.7 A culture of quality is formed in the academic community of the higher education institution that contributes to the constant development of the study programme and educational activity related to this programme.</p> <p>Criterion 10. Study through research.</p> <p><i>Note.</i> Criterion 10 is applied during accreditation of study programmes of the third cycle of higher education.</p> <p>10.6 The higher education institution ensures observance of academic integrity in the research activities of supervisors and doctoral students (adjuncts), in particular by taking measures to preclude the possibility of student supervision by persons who have committed violations of academic integrity.</p>
<p>1.2 Design and approval of programmes</p>	<p>Criterion 1. The design and objectives of the study programme.</p>

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
<p>Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the EHEA.</p>	<p>1.1 The study programme has clearly formulated objectives that meet the mission and strategy of the higher education institution.</p> <p>1.2 The study programme objectives and programme learning outcomes are defined based on the positions and needs of interested parties (stakeholders).</p> <p>1.3 The study programme objectives and programme learning outcomes are defined based on the trends of development of the Program Subject Area (speciality), labour market, sectoral and regional context, as well as the experience of similar Ukrainian and international study programmes.</p> <p>1.4 The study programme fosters the achievement of the learning outcomes stated by the higher education standard for the respective Program Subject Area (speciality) and higher education level (if available). If no approved higher education standard is available for the respective Program Subject Area (speciality) and higher education level, programme learning outcomes should meet requirements of the National Qualification Framework for the respective qualification level.</p> <p>Criterion 2. The structure and content of the study programme.</p> <p>2.1 The scope of the study programme and its separate educational components (in ECTS credits) are in line with the requirements of legislation concerning the learning workload for the relevant higher education level and meet the relevant higher education standard (if available).</p> <p>2.2 The content of the study programme has a clear structure; educational components included into the study programme constitute a logical consistent system and, taken together, allow the achievement of the stated objectives and programme learning outcomes.</p> <p>2.3 The content of the study programme is in line with the Program Subject Area (speciality) (or specialities in cases of interdisciplinary programmes).</p> <p>2.7 The content of the study programme takes into account requirements of the respective professional standard (if available).</p> <p>2.8 The scope of the study programme and its separate educational components (in ECTS credits) realistically reflects the actual workload of students, is relevant for achieving objectives and programme learning outcomes.</p> <p>Criterion 5. Control measures, evaluation of students and academic integrity.</p> <p>5.2 Forms of attestation of students are in line with the requirements of the higher education standard (if available).</p>
<p>1.3 Student-centred learning, teaching and assessment</p> <p>Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.</p>	<p>Criterion 2. The structure and content of the study programme.</p> <p>2.4 The structure of the study programme envisages the possibility of forming an individual educational trajectory, in particular, though the individual choice of modules by students in the amount stipulated by legislation.</p> <p>2.5 The study programme and curriculum envisage practical training of students that allows them to gain the competencies necessary for further professional activity.</p> <p>2.6 The study programme envisages the development of soft skills in students that meet stated objectives.</p>

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
	<p>2.9 If students are trained under a dual form of education, the structure of the study programme and its curriculum are harmonized with the tasks and specific features of this form of education.</p> <p>Criterion 3. Access to the study programme and learning outcomes recognition.</p> <p>3.3 Clear and easy-to-understand rules are established for recognition of learning outcomes received at other education institutions, in particular during academic mobility, which are in line with the Convention on the Recognition of Qualifications concerning Higher Education in the European Region (Lisbon, 1997), are available to all participants of the educational process and are consistently observed during realization of the study programme.</p> <p>3.4 Clear and easy-to-understand rules are established for recognition of learning outcomes received in the frame of non-formal education, are available to all participants of the educational process, and are consistently observed during realization of the study programme.</p> <p>Criterion 4. Teaching and learning under the study programme.</p> <p>4.1 The forms and methods of teaching and learning contribute to achieving objectives and programme learning outcomes stated in the study programme; meet requirements of student-centered approaches and the principles of academic freedom.</p> <p>4.3 The higher education institution provides a combination of learning and research during realization of the study programme appropriate to the higher education level, Program Subject Area (speciality) and objectives of the study programme.</p> <p>4.5 Learning, teaching and scientific research are related to the internationalization activities of the higher education institution.</p> <p>Criterion 5. Control measures, evaluation of students and academic integrity.</p> <p>5.1 Forms of control measures and evaluation criteria for students are clear, easy-to understand, allow for the assessment of achievement of learning outcomes by the student in each individual educational component and/or in the study programme as a whole, and are published in advance.</p> <p>Criterion 8. Internal quality assurance of the study programme.</p> <p>8.2 Students, directly and through student governance bodies, are engaged as partners in the process of periodic review of the study programme and in procedures related to its quality assurance. The position of students is taken into consideration in reviewing the study programme.</p> <p>Criterion 10. Study through research.</p> <p><i>Note.</i> Criterion 10 is applied during accreditation of study programmes of the third cycle of higher education.</p> <p>10.1 The content of the study programme is consistent with the research interests of doctoral students (adjuncts) and ensures their full-fledged preparation for research and teaching activities in higher education institutions within their Program Subject Area (speciality) and/or sector.</p>

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
	<p>10.4 The higher education institution arranges opportunities for doctoral students (adjuncts) to join their international academic community by Program Subject Area (speciality), in particular through conference presentations, publications, participation in joint research projects, etc.</p>
<p>1.4 Student admission, progression, recognition and certification</p> <p>Institutions should consistently apply pre-defined and published regulations covering all phases of the student “life cycle”.</p>	<p>Criterion 3. Access to the study programme and learning outcomes recognition.</p> <p>3.1 The admission rules for the study programme are clear and easy-to-understand, do not contain any discriminatory provisions and are published on the official website of the higher education institution.</p> <p>3.2 The admission rules for the study programme take into account any peculiarities of the study programme itself.</p> <p>Criterion 4. Teaching and learning under the study programme.</p> <p>4.2 All participants of the educational process are provided, in a timely manner, with available and clear information regarding the objectives, content, programme learning outcomes, and the evaluation procedure and criteria employed in individual educational components (in the form of a syllabus or in another similar way).</p> <p>Criterion 5. Control measures, evaluation of students and academic integrity.</p> <p>5.1 Forms of control measures and evaluation criteria for students are clear, easy-to understand, allow for the assessment of achievement of learning outcomes by the student in each individual educational component and/or in the study programme as a whole, and are published in advance.</p> <p>5.3 Clear and easy-to-understand rules for conducting control measures are established, these rules are available to all participants of the educational process, provide for the impartiality of examiners, in particular include procedures to prevent and solve conflicts of interest, define procedures for challenging the results of control measures and re-assessment, and are consistently observed during realization of the study programme.</p>
<p>1.5 Teaching staff</p> <p>Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.</p>	<p>Criterion 6. Human resources.</p> <p>6.1 The academic and/or professional qualification of academics involved in the realization of the study programme ensure achievement of the objectives and programme learning outcomes stated by the respective programme.</p> <p>6.2 Procedures of competitive selection of academics are transparent and allow for the ensurance of a necessary level of professionalism for successful realization of the study programme.</p> <p>6.3 The higher education institution engages employers into organization and realization of the educational process.</p> <p>6.4 The higher education institution involves professional practitioners, sector experts, representatives of employers into classroom activities.</p>

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
	<p>6.5 The higher education institution supports the professional development of academics through its own professional development programmes or by working together with other organizations.</p> <p>6.6 The higher education institution promotes development of teaching excellence.</p>
<p>1.6 Learning resources and student support</p> <p>Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.</p>	<p>Criterion 4. Teaching and learning under the study programme.</p> <p>4.4 Academic staff, researchers (herewith “academics”) update their educational content based on the latest scientific achievements and modern practices in the respective sector.</p> <p>Criterion 7. Educational environment and material resources.</p> <p>7.1 The financial, material and technical resources (the library, other infrastructure, equipment, etc.), and other learning and teaching materials of the study programme ensure achievement of the objectives and programme learning outcomes stated by the study programme.</p> <p>7.2 The higher education institution ensures free access to relevant infrastructure and information resources necessary for learning, teaching and/or scientific activities of academics and students of the study programme.</p> <p>7.3 The educational environment is safe for the life and health of students of the study programme, and allows them to meet their needs and interests.</p> <p>7.4 The higher education institution provides educational, organizational, informational, consultative and social support to students of the study programme.</p> <p>7.5 The higher education institution creates sufficient conditions for the realization of the right to education by persons with special educational needs, who study in the programme.</p> <p>7.6 A clear and easy-to-understand policy and procedures exist for mitigation of conflict situations (in particular, related to sexual harassment, discrimination and/or corruption, etc.), which are available to all participants of the educational process and are consistently observed during realization of the study programme.</p> <p>Criterion 10. Study through research.</p> <p><i>Note.</i> Criterion 10 is applied during accreditation of study programmes of the third cycle of higher education.</p> <p>10.3 The higher education institution organizationally and materially provides, under the study program, opportunities to conduct research and to test research results in accordance with the research topics of the doctoral students (adjuncts) (i.e. regular conferences, seminars, colloquia, access to the use of laboratories, equipment, etc.).</p>
<p>1.7 Information management</p> <p>Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.</p>	<p>Criterion 8. Internal quality assurance of the study programme.</p> <p>8.4 A practice exists to collect, analyze and take into consideration information about the career path of graduates of the study programme.</p> <p>Criterion 9. Transparency and publicity.</p>

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
	<p><i>Note.</i> Criterion 9 is applied taking into account the requirements and restrictions regarding disclosure of restricted information established by legislation.</p> <p>9.2 At least a month prior to approval of the study programme or changes to it, the higher education institution publishes the respective draft study programme on its official website with the aim of receiving comments and suggestions from interested parties (stakeholders).</p>
<p>1.8 Public information</p> <p>Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to date and readily accessible.</p>	<p>Criterion 9. Transparency and publicity.</p> <p><i>Note.</i> Criterion 9 is applied taking into account the requirements and restrictions regarding disclosure of restricted information established by legislation.</p> <p>9.1 Clear and easy-to-understand rules and procedures are established that regulate the rights and responsibilities of all participants of the educational process, and are accessible to them and consistently observed during realization of the study programme.</p> <p>9.3 The higher education institution publishes, in a timely manner, on its official website, correct and reliable information about the study programme (including its objectives, expected learning outcomes and components, in an amount sufficient to inform respective interested parties (stakeholders) and society.</p>
<p>1.9 On-going monitoring and periodic review of programmes</p> <p>Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.</p>	<p>Criterion 8. Internal quality assurance of the study programme.</p> <p>8.1 The higher education institution consistently observes its established procedures for development, approval, monitoring and periodic review of the study programme.</p> <p>8.2 Students, directly and through student governance bodies, are engaged as partners in the process of periodic review of the study programme and in procedures related to its quality assurance. The position of students is taken into consideration in reviewing the study programme.</p> <p>8.3 Employers, directly and/or through their associations, are engaged as partners in the process of periodic review of the study programme and other procedures related to its quality assurance.</p> <p>8.4 A practice exists to collect, analyze and take into consideration information about the career path of graduates of the study programme.</p> <p>8.5 The quality assurance system of the higher education institution ensures reaction to shortcomings identified in the study programme and/or educational activities related to the realization of the study programme.</p> <p>8.6 The results of external higher education quality assurance (in particular, comments and suggestions formulated during previous accreditations) are taken into account during reviews of the study programme.</p> <p>8.7 A culture of quality is formed in the academic community of the higher education institution that contributes to the constant development of the study programme and educational activity related to this programme.</p>
<p>1.10 Cyclical external quality assurance</p>	<p>This standard is implemented in:</p> <ul style="list-style-type: none"> - Law of Ukraine "On Education" (Articles 46, 48, 49);

ESG Standards	Regulations on Accreditation of Study Programme in Higher Education
<p>Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.</p>	<ul style="list-style-type: none"> - Law of Ukraine "On Higher Education" (Articles 24, 25); - Law of Ukraine "On Licensing Types of Economic Activity"; - Cabinet of Ministers Resolution No. 1187 of December 30, 2015, "On Approval of the Licensing Conditions for Educational Activities of Educational Institutions"; - Cabinet of Ministers Resolution No. 347 of May 10, 2018, "On Amendments to the Cabinet of Ministers Resolution No. 1187 of December 30, 2015," which presents the revised Licensing Conditions for Educational Activities. <p>In 2019 the "Regulation on the accreditation of study programmes" was approved by the Cabinet of Ministers of Ukraine. According to it, "The next (subsequent) accreditation is carried out within the last year of the validity period of the accreditation certificate or during the period of conditional (deferred) accreditation. In case the subsequent accreditation is not conducted before the expiration of the validity period of the accreditation certificate or the period of conditional (deferred) accreditation, such accreditation is carried out in the same order as the initial accreditation".</p> <p>The implementation of the Law of Ukraine "On Amendments to Certain Laws of Ukraine on Higher Education Quality Assurance" (adopted in 2023) will enable compliance with standard 1.10, particularly in terms of post-accreditation monitoring (Article 18). The procedure for its conduct will be defined by the new accreditation regulation, currently under development.</p> <p>A certificate of accreditation (including the "exemplary") is issued for a period of five years, a certificate of conditional (delayed) accreditation - for a period of one year. If the HEI has institutional accreditation and "exemplary" accreditation of study programme, a certificate of accreditation of such study programme is issued for a period of 10 years.</p>

4.4 QA activities and their methodologies

External QA process is predetermined in the Regulations on Accreditation of Study Programmes, and the course and outcomes of which are publicly accessible through the NAQA IT system public.naqa.gov.ua and the official resources of NAQA. All study programmes accreditation results are recognized and have corresponding consequences for study programmes and HEIs in Ukraine.

A HEI that wishes to accredit a study programme submits the following materials for accreditation to NAQA:

- 1) an application for study programme accreditation;
- 2) the study programme document and programme curriculum approved as appropriate;
- 3) a Self-Assessment Report of study programme in accordance with the Criteria as well as documents that support the information provided in the report. Self-Assessment Report of study programme includes general information about HEI, study programme applied for accreditation, history of its development and implementation and a list of questions, which is composed in line with the ESG 2015, also it includes several tables e.g. Information about compulsory educational components of the study

programme, Summarised information about teachers, Matrix of appropriateness of the programme study results, educational components, teaching and appraising methods;

4) employers' reviews and testimonials (if available).

The accreditation procedure includes:

1) assessment by the expert group of the Self-Assessment Report, materials attached to it, and all other materials and information regarding the study programme and activities of the higher education institution under such programme;

2) a site visit of the expert group to the HEI with the aim of verifying facts stated in the Self-Assessment Report, interviewing representatives of stakeholders regarding the study programme and activities of the higher education institution under such programme, developing recommendations aimed at improving the quality of the educational activities under such programme;

3) development of a report on the results of the site visit;

4) examination of the expert group report by SEC;

5) SEC report;

6) review of the case during NAQA Board meeting;

7) decision of NAQA.

Since legislative changes in 2023, NAQA implemented the follow-up mechanism – post-accreditation monitoring. At the beginning of 2024 7 Ukrainian HEIs voluntarily participated in the piloting of the post-accreditation monitoring. After piloting, all 7 universities provided positive feedback regarding the post-accreditation monitoring procedure. Thus, NAQA plans to scale the post-accreditation monitoring experiment to 30 study programmes in order to receive feedback from HEIs to improve the procedure and develop recommendations for conducting post-accreditation monitoring.

The quality assurance system in Ukraine provides that 46 foreign accreditation agencies, included in Cabinet Resolution No. 554 of July 10, 2019 (updated on 20.01.2023) (hereinafter "the Order"), have accreditation rights similar to the rights of NAQA. In order to comply with Ukrainian legislation in the field of higher education quality assurance, the national accreditation procedure and national standards during cross-border accreditations, NAQA provides consultations at the request of foreign agencies. NAQA supports and appreciates the positive effects of cross-border quality assurance, as it provides a number of advantages for both higher education institutions and the system as a whole, allows to draw on the experience of other countries and take it into account for national transformations. In the period from 2019 to 2023, 9 foreign agencies from 6 countries carried out accreditations on the territory of Ukraine.

Cases of dishonest accreditation by foreign agencies were also recorded. This topic was also raised during the National Peer Counselling Meeting with experts and representatives of ENQA and EQAR. In April 2024, NAQA sent a call to the QA agencies from the list of the Order with the request to follow EQAR's key considerations for cross-border QA, Bucharest Communiqué of the Conference of European Ministers Responsible for Higher Education 2012, Yerevan Ministerial Communiqué 2015, Rome Ministerial Communiqué 2020, Ukrainian legislation. NAQA got a positive feedback from a number of agencies both at personal meetings with agencies and by e-mails.

Since that, in accordance with the Order of the Ministry of Education and Science of Ukraine No. 425 dated 29.03.2024, a working group on development of proposals for improving the mechanism of recognition of certificates (official decisions) on the accreditation of study programmes issued by foreign accreditation agencies or higher education quality assurance agencies was formed. This working group includes NAQA representatives. NAQA also suggested a revision of the list of foreign accreditation agencies that can carry out accreditations on the territory of Ukraine.

Therefore, regulation of cross-border quality assurance processes is extremely important and priority for the Ukrainian higher education quality assurance system.

4.5 Peer review experts

Within the framework of accreditation expertise, all procedures are conducted by independent experts who are included in NAQA expert registry and do not have conflicts of interest with respect to each other, the specified study programme, and the HEI where it is implemented. To ensure reliable and consistent work of experts, they undergo thorough selection and training by NAQA, after which they receive the status of NAQA experts and are included in the Register of Experts. They possess the necessary skills and competencies to perform their functions and undergo periodic training for qualification enhancement. Prior to each accreditation expertise, they also receive instructions.

Selection of experts (hereinafter “selection”) is carried out in the following stages:

- 1) announcement about the open call for accreditation experts on NAQA official website;
- 2) reception of applications and accompanying documents from candidates (CV, motivation letter, confirmation document from the HEI);
- 3) study of the submitted documents, if necessary - phone interview with candidates by NAQA secretariat employees;
- 4) publication of the list of pre-selected candidates;
- 5) conducting training for pre-selected candidates regarding the procedure and criteria for study programmes accreditation, as well as the application ESG 2015;
- 6) testing for the pre-selected candidates;
- 7) including of the selected candidates in the Register of Experts by decision of NAQA Board.

NAQA provides trainings for candidates for experts and experts. NAQA developed two online courses on the Prometheus online platform “Expert on accreditation of study programmes” and “How to write a quality report on the results of the accreditation assesment of study programme”. These two online courses are free of charge and available on an ongoing basis. NAQA trainers conduct a one-day trainings for expert candidates, professional development trainings, trainings for heads of expert panels, one-day training for experts who have not been involved in accreditations for a long period of time and trainings for SECs.

The Register of Experts includes 4430 experts, where 2542 experts are academic staff representatives and 888 are students. In 2023 the Commission on ensuring the quality of experts’ performance of NAQA started its work. The main directions of the work of Commission are evaluation of the work of experts, consideration of complaints about the work of experts.

Taking into account the large number of accreditation cases, NAQA expert pool, especially student-experts pool is too small to carry out all accreditations. Also, despite the large number of trainings on various topics, there is a need of revision and update in accordance with modern challenges and needs. In addition, the involvement and training of foreign experts remains an urgent issue in the work of NAQA.

4.6 Complaints & Appeals

Higher education institutions have the right to appeal decisions made by NAQA. On May 21, 2019, it developed and approved the Procedure for appealing decisions of the National Agency for Higher Education Quality Assurance. The decisions of NAQA can be contested by submitting the corresponding appeal to the Appeals Committee of NAQA. The Appeals Committee consists of members of NAQA (currently five individuals) and is approved at NAQA Board meeting.

NAQA understood the need to improve these processes to achieve full compliance with Standard 2.7. and systematically worked on changes to the legislation of Ukraine in this case.

In accordance with the amendments to the Law of Ukraine "On Higher Education" dated May 2, 2023, which were initiated by NAQA "The National Agency for Higher Education Quality Assurance forms the Appeals Chamber consisting of five members from persons who have a higher education, a scientific degree and/or an academic title and professional work experience in the field of quality assurance of higher education for at least five years. Members of the Appeals Chamber are elected for a period of two years on a competitive basis and perform the functions assigned to them on the basis of the civil law contracts concluded with them. NAQA Members and its Sectoral Expert Councils cannot be members of the Appeals Chamber. The same person cannot be a member of the Appeals Chamber for more than two terms.

The procedure for forming the composition of the Appeals Chamber, its powers and the procedure for their implementation are determined by the Regulation on the Appeals Chamber, which is approved by the central executive body in the field of education and science.

The Appeals Chamber considers appeals against the decisions of NAQA in the manner determined by the provisions on the Appeals Chamber.

Based on the results of the review of the appeal, the Appeals Chamber makes a reasoned decision, which can cancel the contested decision NAQA. In the case of cancellation of the decision of NAQA, the relevant issue shall be reconsidered at its next meeting. In case of disagreement with the decision of the Appeals Chamber, NAQA may confirm its previous decision by two-thirds of the members of NAQA. Such a decision shall enter into force from the day of its adoption and shall not be appealed to the Appeals Chamber".

In accordance with the Order of the Ministry of Education and Science Ukraine No. 1551 dated December 21, 2023, the Regulation on the Appeals Chamber of the National Agency for Higher Education Quality Assurance was approved. On May 28, 2024, the Law of Ukraine "On Higher Education" in the part of the formation of the Appeals Chamber will enter into force. Accordingly, after that NAQA will announce a competition for the election of the competition commission for the election of members of the Appeals Chamber.

4.7 Thematic review

NAQA prepares and publishes annually Report on Higher Education Quality in Ukraine and Its Compliance with the Tasks of Sustainable Innovative Development of Society and Report on the Activities of the National Agency for Higher Education Quality Assurance and forwards these documents to the Verkhovna Rada of Ukraine, to the President of Ukraine, to the Cabinet of Ministers of Ukraine and to higher education institutions for discussion and proper response.

The Report on Higher Education Quality in Ukraine and Its Compliance with the Tasks of Sustainable Innovative Development of Society contains the information regarding correspondence of higher

education to the goals of sustainable development of society, quantitative indicators of the national system of higher education in Ukraine including HEIs, students, teaching staff, study programmes, temporary relocated HEIs, the information about NAQA decisions on accreditation by full procedure, and technical accreditation decisions, study programme accreditations made by foreign QA agencies, QA system response to the study programme evaluation during the accreditation procedure and after NAQA decision, response of the HEIs internal QA system to the decision on conditional accreditation, NAQA internal QA system, information on the ensuring the feedback from the key stakeholders, activities on ensuring the quality of work of NAQA experts, compliance with ESG 2015, educational activities of the military HEIs, plans and perspectives in the higher education quality assurance field.

NAQA annual report contains the information on internationalization of Ukrainian QA system and NAQA activities, coordination of communication processes, information about external QA system and study programme accreditation of 29 fields of knowledge, NAQA activity by operational directions, consideration of complaints regarding the violations of academic integrity by NAQA Ethics Committee and legislative changes in the QA system.

Despite the existing reporting, NAQA sees a need to expand its analytical work. It will facilitate the identification of developments, trends and patterns across the higher education system of Ukraine to substantiate and make effective management decisions, develop strategies, forecasts, improve policies and quality assurance processes at the institutional, national and international levels. In this regard, NAQA creates a separate Analytical and Training Sector which will directly take care of these tasks.

4.8 Internal quality assurance and professional conduct

In its activities, both external and internal, NAQA is guided by its strategic documents, in particular, the Charter, Mission and Strategy, Communication Strategy, Regulations and Policy on NAQA Quality Assurance Activity, and the Code of Academic Integrity. Understanding the dynamism of modern challenges and needs, NAQA introduced a review and update of strategic documents. Thus, changes to the Charter were approved by the Cabinet of Ministers of Ukraine on January 23, 2024, The Mission and Strategy, Communication Strategy were revised during the NAQA Strategic Session on April 2024. In its work, NAQA constantly communicates with stakeholders and involves them in all quality assurance processes. Systematization and adjustment of the process of collecting and analysing feedback from stakeholders will increase efficiency and improve the quality of implementation of stakeholders' contributions to the work of NAQA. And in connection with the high level of workload of NAQA secretariat employees and NAQA Board members, NAQA sees a necessity of clarifications of the needs for balancing the work, increasing professionalism. In this regard, there is a need of revision and improvement of NAQA internal QA system in order to fully comply with Standard 3.6

5. Priority actions

1	Legal framework	Diversification of external quality assurance opportunities in Ukraine	
Objectives		<ul style="list-style-type: none"> • Improvement of the external higher education quality assurance system in accordance with the best global practices • Implementation of norms of the Law "On Higher Education" and "On Education" • Increasing the objectivity of evaluating the educational activity of HEIs and creating additional advanced tools and procedures for external quality assurance of higher education 	
Specific tasks		Responsible(s)	Timeline
1	Study of global practices of external higher education quality assurance	NAQA, external experts	December 2024
2	Development of the Regulation on independent institutions for higher education quality assessment and assurance	NAQA	June 2025
3	Approval of the Regulation on independent institutions for higher education quality assessment and assurance	Ministry of Education and Science of Ukraine	No later than 6 months after the end of martial law
4	Piloting the procedure of accreditation of independent institutions for higher education quality assessment and assurance	NAQA	2025-2026
Outcomes		<ul style="list-style-type: none"> • Study results of the impact of independent institutions for higher education quality assessment and assurance on the higher education system • Developed and approved regulatory documents that regulate the activities of independent institutions for higher education quality assessment and assurance in Ukraine • Conducted pilot accreditations and formed register of independent institutions for higher education quality assessment and assurance 	
Risks		Mitigation actions	
Untimely approval of draft documents by the central bodies of executive power		Involvement of the government, higher education institutions and other stakeholders in the implementation processes	
Low activity in the development of independent institutions for higher education quality assurance and assessment		Promotion of the idea of the development of independent institutions for higher education quality assurance and assessment	
Objective reasons related to the conditions of martial law in Ukraine			

2	Legal framework	Implementation of the institutional accreditation	
Objectives	<ul style="list-style-type: none"> • Implementation of the Laws "On Higher Education" and "On Education" • Enhancing trust in Ukrainian HEIs by implementating institutional accreditation • Positive impact on external and internal quality assurance systems 		
Specific tasks		Responsible(s)	Timeline
1	Defining the concept and model of institutional accreditation in Ukraine	NAQA, Ministry of Education and Science, Working group of Ukraine	December 2024
2	Piloting of the institutional accreditation procedure in higher education institutions of Ukraine	NAQA, Working group	December 2025
3	Development of the Regulation on institutional accreditation	NAQA, Working group	2026
4	Approval of the Regulation on institutional accreditation	Ministry of Education and Science of Ukraine	No later than 6 months after the end of martial law
5	Development of mechanisms in NAQA to introduce institutional accreditation	NAQA	No later than 6 months after the end of martial law
Outcomes	<ul style="list-style-type: none"> • Developed concept and model of institutional accreditation that correspond to ESG 2015, foreign experience and Ukrainian needs and specifics of the higher education system • Received feedback and defined tasks for higher education institutions regarding institutional accreditation • Defined procedure of the institutional accreditation • Improved internal quality assurance systems of HEIs • Developed information support for institutional accreditation 		
Risks		Mitigation actions	
Untimely approval of the Regulation on institutional accreditation by the central bodies of the executive power		Involvement of the government and society	
Insufficient motivation of HEIs to participate in the development and implementation of institutional accreditation		Creation of conditions for HEIs encouragement	
Unpreparedness of HEIs to undergo the institutional accreditation procedure		Provision of informational, methodological, and consulting support for HEIs	
Lack of sufficient resources (including financial) for institutional accreditation		Attracting external funding to ensure institutional accreditation procedures	

Objective reasons related to the conditions of martial law in Ukraine		
3	Methodologies of QA activities	Further implementation of post-accreditation monitoring
Objectives		<ul style="list-style-type: none"> • Scaling of the post-accreditation monitoring experiment • Developing recommendations for post-accreditation monitoring • Approval of the mechanism for post-accreditation monitoring for HEIs and NAQA.
Specific tasks		Responsible(s)
1	Development of recommendations for post-accreditation monitoring	NAQA, Programme Accreditation Department
2	Approbation of post-accreditation monitoring for 30 study programmes of various HEIs	NAQA, Programme Accreditation Department, external stakeholders
3	Refining of the post-accreditation monitoring procedure based on piloting results	NAQA, HEIs
4	Enhancing internal mechanisms and tools for post-accreditation monitoring	NAQA, Programme Accreditation Department, Support of Sectoral Expert Councils (SECs) Department
5	Development of recommendations for HEIs regarding post-accreditation monitoring and improvement of quality monitoring systems of study programmes	NAQA, Programme Accreditation Department
Outcomes		<ul style="list-style-type: none"> • Involvement of a wider circle of HEIs in post-accreditation monitoring processes • Comprehensive methodological recommendations and instructional materials tailored for HEIs on post-accreditation monitoring and quality monitoring systems for study programmes • Developed additional software for post-accreditation monitoring
Risks		Mitigation actions
Lack of motivation among HEIs to engage in the experiment due to the absence of an official outcome from post-accreditation monitoring		Informing HEIs and other stakeholders about the need of study programmes quality monitoring and post-accreditation monitoring, creating

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	effective mechanisms for their implementation in HEIs
Lack of financial capacity to develop post-accreditation monitoring software	Fundraising and attracting external resources to improve the software
Objective reasons related to the conditions of martial law in Ukraine	

4	Methodologies of QA activities	Regulation of cross-border quality assurance processes		
Objectives	<ul style="list-style-type: none"> Improvement of legislation in the field of recognition of certificates issued by foreign accreditation agencies and agencies for quality assurance of higher education Establishing an understanding on cross-border quality assurance procedures at the level of international institutions 			
Specific tasks		Responsible(s)	Timeline	
1	Call to foreign accreditation agencies regarding the consideration of Ukrainian legislation, standards and regulatory documents developed for the EHEA by foreign agencies during the accreditation of study programmes in Ukraine	NAQA, PR and International Cooperation Department	April 2024	
2	Development of an algorithm of actions and criteria for initiating the issue of changing the list of accreditation agencies in the Resolution of the Cabinet of Ministers of Ukraine	NAQA	December 2024	
3	Development of proposals regarding the Cabinet of Ministers' list of foreign accreditation agencies and higher education quality assurance agencies	NAQA, Cabinet of Ministers of Ukraine	September 2024	
4	Creation of a working group to develop proposals for improving the mechanism of recognition of certificates (official decisions) on the accreditation of study programmes issued by foreign accreditation agencies or higher education quality assurance agencies, the list of which is approved by the Cabinet of Ministers of Ukraine	Ministry of Education and Science of Ukraine, the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine, NAQA, HEIs	April 2024	
Outcomes	<ul style="list-style-type: none"> Development of joint positions between NAQA and foreign assessment and quality assurance agencies regarding accreditation procedures on the territory of Ukraine Amendments to the List of foreign accreditation agencies and higher education quality assurance agencies authorized to issue certificates of accreditation of study programmes recognized in Ukraine, approved by the order of the CMU No. 554-r dated 10.07.2019 Development of a resolution of the Cabinet of Ministers of Ukraine on the procedure for forming the List of foreign accreditation agencies and higher education 			

	quality assurance agencies that issue certificates of accreditation of study programmes recognized in Ukraine.
Risks	Mitigation actions
Ignoring NAQA call to foreign agencies/ by foreign agencies to follow requirements of ENQA and EQAR regarding the accreditation of study programmes in Ukraine	Additional mechanisms of influence, constant communication with agencies, outreach work
Non-compliance with the standards of higher education of Ukraine and non-compliance with the Licensing conditions for conducting educational activities in the process of accreditation by foreign agencies	

5	Peer review experts	Enhancement of NAQA experts skills in line with modern QA request
Objectives		<ul style="list-style-type: none"> • Improvement of the standardization of the status of NAQA-expert • Bringing educational content in line with the needs of the modern state of higher education • Improvement of study programmes evaluation parameters • Expansion of the experts' pool from the number of students and international experts • Promotion of updating the Register of experts and formation of a positive image of NAQA experts
Specific tasks		Responsible(s)
1	Development of video courses on current issues regarding quality assessment	NAQA, Analytical and Training Sector, PR and International Cooperation Department
2	Implementation of the experts performance evaluation system based on the results of participation in study programmes accreditation	NAQA, Experts Support Department
3	Development of the Regulation on expert and expert group	NAQA
4	Development of a training programme for international experts	NAQA, Analytical and Training Sector, Advisory Board
5	Development and implementation of new training programmes for the professional development of experts and updating existing trainings based on the results of work quality monitoring	NAQA, Analytical and Training Sector
6	Development and implementation of training programmes for potential NAQA student experts	NAQA, UAS, other student unions
7	Promotion of a status of NAQA expert	PR and International Cooperation Department
Outcomes		<ul style="list-style-type: none"> • A complex of video courses on relevant topics in quality assessment • Approval of the Regulation on the expert and the expert group • Training programme for international experts • Developed and implemented new training programmes, as well as updated existing ones, for the professional development of experts • The UAS QA POOL training programme developed and implemented

	<ul style="list-style-type: none"> • A series of webinars on approaches to the evaluation of study programmes at all levels of the accreditation procedure • Implementation of the system of experts' evaluation based on the results of accreditation procedures • Updated guidelines and instructional materials
Risks	Mitigation actions
Lack of funding for development of the video courses	Fundraising and attraction of external financing
Random interpretation of study programmes evaluation criteria by experts at all levels of the accreditation procedure	Development of clear evaluation parameters
Limited resources (personnel, financial, etc.)	Increasing the range of involved external experts and other resources
Deformed motivation for being in the status of an expert	Updating the register of experts
Objective reasons related to the conditions of martial law in Ukraine	

6	Appeals and complaints	Implementation of appeals and complaints procedures
Objectives		<ul style="list-style-type: none"> • Formation of the composition of the Appeals Chamber • Ensuring the activities and functionality of the Appeals Chamber • Increasing the level of awareness of participants in the accreditation process regarding the procedures for contesting assessment results and actions of individuals persons involved in accreditation and appeals against decisions on accreditation made by NAQA
Specific tasks		Responsible(s)
1	Establishment of the Competition commission for the selection of members of the Appeals Chamber and provision of support of its activities	NAQA, Ministry of Education and Science of Ukraine, Employers union, UAS
2	Conducting a fair and transparent competition to select Appeals Chamber members	Competition commission, NAQA
3	Establishment of conditions for the activities of the Appeals Chamber	NAQA, Preparation of Meetings and Support of the Committees' Work Department
4	Informing participants of the accreditation process about appeal procedures	NAQA, PR and International Cooperation Department
5	Separation of procedures for consideration of appeals and complaints	NAQA
Outcomes		<ul style="list-style-type: none"> • Established Appeals Chamber • Implementation of the provisions of the current legislation regarding the appeal of NAQA decisions • Effective operations of the Appeals Chamber • Clarification of procedures for consideration of appeals and formation of decisions of the Appeals Chamber • Raising the awareness of the participants of the accreditation process regarding appeal and complaint procedures
Risks		Mitigation actions
Organizational problems during competitive selection		Development of the internal documents regarding the organisational activities of the Appeals Chamber
Limited human resources of NAQA Secretariat to ensure the activities of the Appeals Chamber		Involvement of additional NAQA Secretariat employees to support activities
Objective reasons related to the conditions of martial law in Ukraine		

7	Thematic review	Improvement of NAQA analytical activities in accordance with the requirements of the ESG 3.4	
Objectives		<ul style="list-style-type: none"> • Ensuring compliance of NAQA analytical activities with the requirements of ESG 3.4 • Development and implementation of a methodology for structured analysis of data on study programmes and HEIs in order to identify developments, trends and patterns across the higher education system of Ukraine in accordance with the requirements of ESG 3.4 • Identification of positive and negative trends, patterns, factors that have impact on the higher education quality • Using the results of the analysis to substantiate and make effective management decisions, develop strategies, forecasts, improve policies and quality assurance processes at the institutional, national and international levels • Monitoring the effectiveness of the proposed strategies and recommendations and making appropriate corrections • Ensuring access to reliable and objective analytical information in the field of higher education quality assurance for all stakeholders 	
Specific tasks		Responsible(s)	Timeline
1	Conducting a survey of best practices, trends, patterns, problems and areas for improvement according to a certain criterion / ESG-2015 standard. Developing recommendations derived from the survey.	NAQA, Analytical and Training Sector	October 2024
2	Conducting case surveys at the national level on topics related to quality assurance in higher education (in particular, typical problems identified during the external quality assurance activities). Developing recommendations derived from the survey.	NAQA, Analytical and Training Sector	On a regular basis
3	Dissemination of analytical survey results	NAQA, PR and International Cooperation Department	On a regular basis
4	Establishing NAQA information and communication system for analytical research, effective collection, processing and analysis of data on the higher education quality	NAQA	On a regular basis

<p>Outcomes</p>	<ul style="list-style-type: none"> • Identified main problems in the field of quality assurance, their causes and consequences • Identified developments, trends, patterns, areas of good practice or persistent difficulty, and factors that have the greatest impact on the higher education quality • Use of analysis results for decision-making, strategy development, forecasting • Recommendations for the formation of quality assurance strategies and policies at the national level • I quality assurance policies and processes at the national level • Annual reports, report on the higher education quality and other analytical materials, seminars / webinars.
<p>Risks</p>	<p>Mitigation actions</p>
<p>Lack of resources (human, financial, etc.) for analytical research</p>	<ul style="list-style-type: none"> • Conducting a detailed analysis of resource needs for research • Involvement of researchers and analysts with relevant experience in the field of higher education • Involvement of external experts to provide consulting and expert support • Training and professional development for NAQA Secretariat employees
<p>Technical problems (hardware, software problems)</p>	<p>Backup equipment, cloud-based data storage</p>
<p>Lack motivation of HEIs to participate in analytical research</p>	<ul style="list-style-type: none"> • Establishing conditions to enhance motivation • Providing informational, methodological, and consulting support to HEIs
<p>Objective reasons related to the conditions of martial law in Ukraine</p>	

8	Internal QA system of NAQA	Improvement of the internal QA system of NAQA	
Objectives		<ul style="list-style-type: none"> Improving the quality assurance processes of NAQA activities to enhance balance and efficiency Ensuring continuous improvement of the integrity of NAQA activities to meet requirements and increase trust Improvement of feedback mechanisms with stakeholders 	
Specific tasks		Responsible(s)	Timeline
1	Revision of the Policy and Regulations on Quality Assurance	NAQA, Secretariat	December 2024
2	Improvement of tools for monitoring the quality of NAQA work	NAQA, Analytical and Training Sector	April 2025
3	Training (professional development) of NAQA Secretariat employees in order to maintain high professional standards	NAQA, external experts	On a regular basis
4	Improvement of collection mechanisms and analysis of feedback from internal and external stakeholders to ensure more efficient work of the agency	NAQA, Secretariat	On a regular basis
Outcomes		<ul style="list-style-type: none"> Full compliance with ESG 3.6 Constant improvement of NAQA activity Accountability to stakeholders 	
Risks		Mitigation actions	
Lack of resources (human, financial, time)		<ul style="list-style-type: none"> Conducting a detailed analysis of resource needs for research Involvement of additional resources at various stages, in particular with the involvement of external funding sources (if necessary) 	
Lack of communication		Improvement of the communication strategy and internal communications system	
Objective reasons related to the conditions of martial law in Ukraine			

6. Summary table

No.	Priority action	Was the priority action already identified in BFUG TPG C-QA? (YES/NO)	Actors	Timeline	Desired outcome
1	Diversification of external quality assurance opportunities in Ukraine	YES	NAQA, Ministry of Education and Science of Ukraine, external experts	December 2024 -2026	<p>Study results of the impact of independent institutions for higher education quality assessment and assurance on the higher education system</p> <p>Developed and approved regulatory documents that regulate the activities of independent institutions for higher education quality assessment and assurance in Ukraine</p> <p>Conducted pilot accreditations and formed register of independent institutions for higher education quality assessment and assurance</p>
2	Implementation of the institutional accreditation	YES	NAQA, Ministry of Education and Science, Working group of Ukraine	December 2024- 2026	<p>Developed concept and model of institutional accreditation that correspond to ESG 2015, foreign experience and Ukrainian needs and specifics of the higher education system</p> <p>Received feedback and defined tasks for higher education institutions regarding institutional accreditation</p> <p>Defined procedure of the institutional accreditation</p> <p>Improved internal quality assurance systems of HEIs</p>

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					Developed information support for institutional accreditation
3	Further implementation of post-accreditation monitoring	YES	NAQA, Study Programme Accreditation Department, Support of Sectoral Expert Councils (SECs) Department, external stakeholders, HEIs	December 2024-December 2025	<p>Involvement of a wider circle of HEIs in post-accreditation monitoring processes</p> <p>Comprehensive methodological recommendations and instructional materials tailored for HEIs on post-accreditation monitoring and quality monitoring systems for study programmes</p> <p>Developed additional software for post-accreditation monitoring</p>
4	Regulation of cross-border quality assurance processes	YES	NAQA, PR and International Cooperation Department, Cabinet of Ministers of Ukraine, Ministry of Education and Science of Ukraine, the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	April 2024-December 2024	<p>Development of joint positions between NAQA and foreign assessment and quality assurance agencies regarding accreditation procedures on the territory of Ukraine</p> <p>Amendments to the List of foreign accreditation agencies and higher education quality assurance agencies authorized to issue certificates of accreditation of study programmes recognized in Ukraine, approved by the order of the CMU No. 554-r dated 10.07.2019</p> <p>Development of a resolution of the Cabinet of Ministers of Ukraine on the procedure for forming the List of foreign accreditation agencies and higher education quality assurance agencies that issue certificates of accreditation of study programmes recognized in Ukraine.</p>
5	Enhancement of NAQA experts skills in line with modern QA request	NO	NAQA, Analytical and Training Sector, PR and International Cooperation Department, UAS, other student	April 2024 – September 2025	<p>A complex of video courses on relevant topics in quality assessment</p> <p>Approval of the Regulation on the expert and the expert group</p>

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			unions, Advisory Board		<p>Training programme for international experts</p> <p>Developed and implemented new training programmes, as well as updated existing ones, for the professional development of experts</p> <p>The UAS QA POOL training programme developed and implemented</p> <p>A series of webinars on approaches to the evaluation of study programmes at all levels of the accreditation procedure</p> <p>Implementation of the system of experts' evaluation based on the results of accreditation procedures</p> <p>Updated guidelines and instructional materials</p>
6	Implementation of appeals and complaints procedures	YES	NAQA, Ministry of Education and Science of Ukraine, Employers union, UAS, Competition commission, Preparation of Meetings and Support of the Committees' Work Department, PR and International Cooperation Department	June 2024 – September 2024	<p>Established Appeals Chamber</p> <p>Implementation of the provisions of the current legislation regarding the appeal of NAQA decisions</p> <p>Effective operations of the Appeals Chamber</p> <p>Clarification of procedures for consideration of appeals and formation of decisions of the Appeals Chamber</p> <p>Raising the awareness of the participants of the accreditation process regarding appeal and complaint procedures</p>
7	Improvement of NAQA analytical activities in	NO	NAQA, Analytical and Training	On a regular basis	Identified main problems in the field of quality assurance, their causes and consequences

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	accordance with the requirements of the ESG 3.4		Sector, PR and International Cooperation Department		<p>Identified developments, trends, patterns, areas of good practice or persistent difficulty, and factors that have the greatest impact on the higher education quality</p> <p>Use of analysis results for decision-making, strategy development, forecasting</p> <p>Recommendations for the formation of quality assurance strategies and policies at the national level</p> <p>I quality assurance policies and processes at the national level</p> <p>Annual reports, report on the higher education quality and other analytical materials, seminars / webinars.</p>
8	Improvement of the internal QA system of NAQA	NO	NAQA, Secretariat, external experts	On a regular basis	<p>Full compliance with ESG 3.6</p> <p>Constant improvement of NAQA activity</p> <p>Accountability to stakeholders</p>

7. Conclusions

In the frame of European integration of Ukraine, NAQA National Action Plan fits into this strategic priority because it brings Ukrainian higher education QA system to compliance with ESG 2015 and Ukraine's full entry to the EHEA.

NAQA National Action Plan contains 8 priority actions. NAQA plans to achieve these actions till the beginning of the 2026, however there is a number of risks caused by the objective reasons related to the conditions of martial law in Ukraine.