



# **SELF-ASSESSMENT REPORT OF THE NATIONAL AGENCY FOR HIGHER EDUCATION QUALITY ASSURANCE 2025**

**KYIV  
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## 1. Introduction

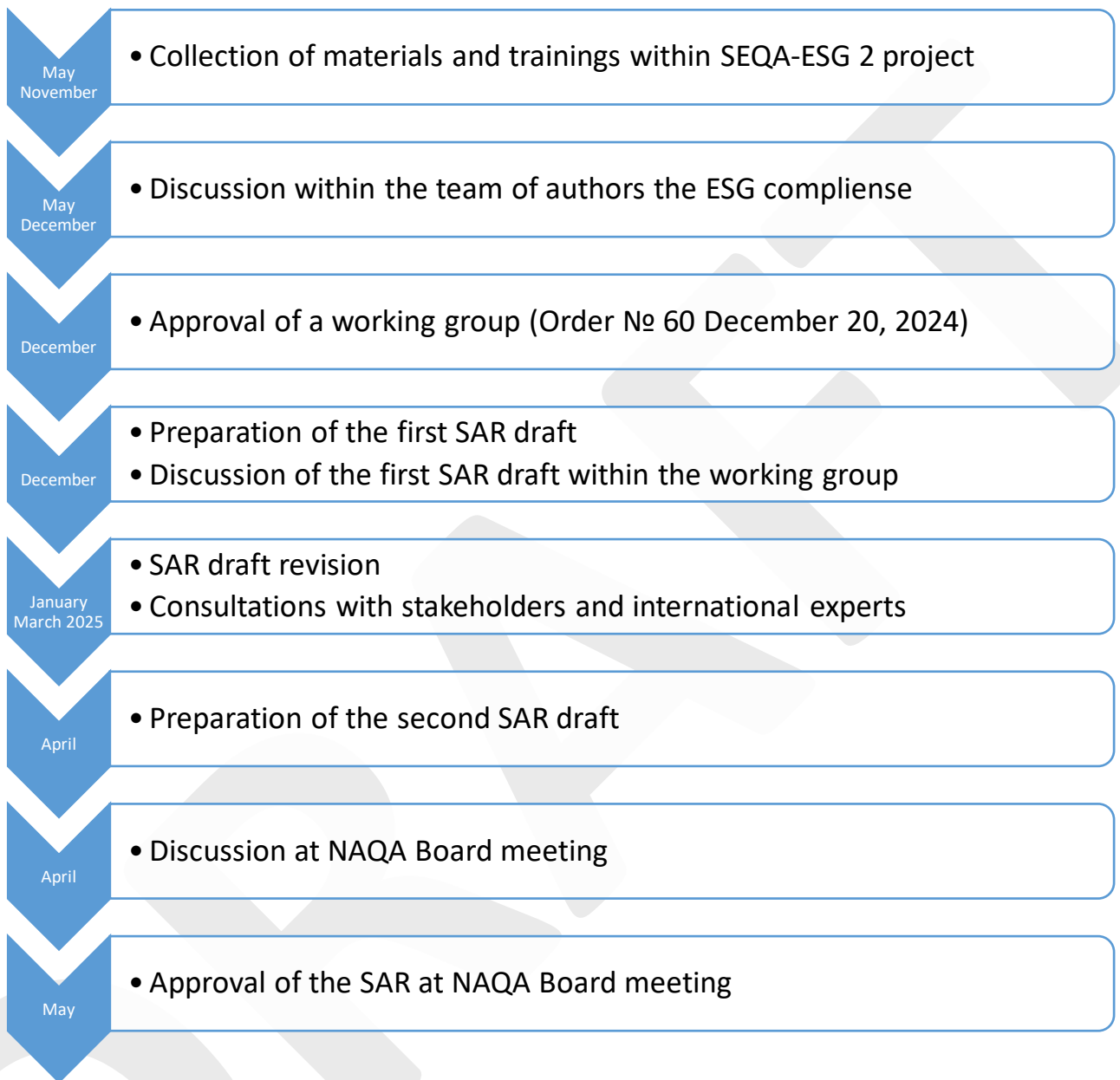
This report has been prepared to showcase the activities of the National Agency for Higher Education Quality Assurance (NAQA) with respect to implementation of the European Standards and Guidelines for quality assurance in European Area of Higher Education (ESG 2015) as a prerequisite for external review by the European Association of Quality Assurance of Higher Education (ENQA) and inclusion in the European Quality Assurance Register for Higher Education (EQAR). Although NAQA is applying for full ENQA membership in 2025, the report developed in accordance with ENQA requirements and contains a critical self-analysis of NAQA's activities.

The Ukrainian higher education quality assurance system has been launched in 2019 and is still in the process of development. Reforms in the Ukrainian higher education sector started after 2014 and are aimed at establishing a system aligned with the European higher education and research area (EHEA) principles, to develop quality assurance system at national and institutional levels and to actively engage students, employers and the other stakeholders into decision-making and quality assurance processes, to fight against corruption, and to develop decentralization and autonomy of higher education institutions.

The creation, launch and functioning of the NAQA is an objective necessity and a logical step within the Bologna process and in the process of European integration of Ukraine. Similar quality assurance agencies have been established in all EHEA countries, and by 2019 Ukraine had been virtually the only country where the quality assurance system did not function properly according to ESG-2015.

The preparation of this self-assessment report (SAR) has been guided by the requirements of ENQA and follows its suggested structure. SAR presents the analysis of NAQA activities in compliance with ESG Part 2 and Part 3.

## 2. Development of the self-assessment report



### **3. Higher education and QA of higher education in the context of the agency**

#### **3.1 Information about the national higher education system in Ukraine**

According to Law of Ukraine No. 1556-VII “On Higher Education” of 01.07.2014, the higher education system consists of the following:

1) Higher education institutions of all ownership forms. There are three types of HEIs: state-owned, communal (also recognized as related to the state) and private.

2) Levels and degrees (qualifications) of higher education. Training of specialists with higher education is carried out according to the relevant educational or scientific programmes at the following levels of higher education: initial level (short cycle); first (bachelor’s) level; second (master’s) level; third (educational-research / educational-creative) level. Higher education at each level involves the successful implementation of the relevant educational or research programme, which is the basis for awarding the appropriate degree of higher education, respectively: 1) junior bachelor; 2) bachelor; 3) master; 4) doctor of philosophy / doctor of arts.

3) Areas of knowledge and specialties. The list of areas of knowledge and specialties is developed on the basis of the International Standard Classification of Education (ISCED) and approved by the Cabinet of Ministers of Ukraine. There were 29 areas of knowledge and 121 specialties. The new list of areas of knowledge, which entered into force on November 1, 2024, includes 10 areas + 1 "Security and Defense" and 110 specialties. This decision finally fulfills the norm established by part three of Article 9 of the Law of Ukraine "On Higher Education" regarding the development of the List of areas of knowledge and specialties based on ISCED.

4) Study and research programmes. The study programme should contain: a list of educational components; their logical sequence requirements for the educational qualifications required to start training under this programme; the number of ECTS credits required to complete this programme; and the expected programme learning outcomes (competencies).

5) License Terms for educational activities and licensing conditions for conducting educational activities in the field of higher education. During licensing, the ability of an educational institution to conduct educational activities in accordance with the requirements in the License Terms is established.

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.

License Terms are currently under review.

6) Governing bodies in the field of higher education. Management in the field of higher education within its powers is carried out by: the Cabinet of Ministers of Ukraine; the central executive body in the field of education and science; sectoral state bodies, which manage institutions of higher education; authorities of the Autonomous Republic of Crimea and local governments, which manage higher education institutions; the National Academy of Sciences of Ukraine and the national branch academies of sciences; founders of higher education institutions; public self-governing bodies in the field of higher education and science; National Agency for Higher Education Quality Assurance.

7) Stakeholders in the educational process. They are the following: research, research-pedagogical and pedagogical workers (research, teaching-research, teaching staff); degree-pursuing students and other persons studying in higher education institutions; practitioners involved in the educational process in educational and professional programmes; other employees of higher education institutions. Employers can also be involved in the educational process.

The higher education quality assurance system in Ukraine consists of the following: 1) internal quality assurance systems in higher education institutions; 2) systems of external quality assurance for educational activities of higher education institutions; 3) quality assurance systems in NAQA and independent institutions of external assessment.

Since gaining independence, Ukraine has faced growing numbers of higher education institutions accompanied by a demographic decline in the number of applicants for higher education, which of course had an impact on quality.

In 1990–1991 in Ukraine, according to publicly available data of the State Statistics Committee of Ukraine, there were only 149 higher education institutions (universities, academies, institutes), which enrolled 881,300 students. These amounts of higher education institutions and applicants for higher education were inherited by Ukraine at the beginning of its independence from the Soviet system of higher education which ceased to exist.

Exactly ten years later, in 2000–2001, there were already twice as many HEIs: 315 universities, academies and institutes. There were also almost one and a half million students (1,402,900). Until 2010, the number of HEIs had been constantly growing primarily due to an increase in the number of private institutions and to the expansion of the branch networks among both state and public institutions. The number was growing despite a significant reduction in the amount of school graduates and a general decline of the country's economy when the country was not able to finance such a network of HEIs sufficiently.

A sharp increase in the number of HEIs required an increase in the number of teachers able to support the educational process. The urgent need for instructors in practical and laboratory classes, and sometimes even for lectures, resulted in a significant migration of school teachers to universities. This wave marked the beginning of an important process: the "massification" of postgraduate education and a significant increase in the number of doctoral degrees awarded, which was not accompanied by adequate control over the quality of dissertation research.

As a result, after 2010 people started talking about amalgamation or merging universities, institutes, and academies to a level that our society actually required, and most importantly, that our economy could support. However, no real steps have yet been taken in this regard — for many reasons, including a lack of understanding of the mechanisms for closing or merging higher education institutions.

The analysis of the higher education system and its transformation processes in the context of Ukraine's entry into the European Higher Education Area as of 2013–2014 was presented in the detailed research entitled "Monitoring the Integration of the Ukrainian Higher Education System into the European Higher Education and Research Area". The statistical information presented in that report covered a very wide range of representative material on 325 HEIs (229 of which are state and municipal and 96 private) which enrolled more than 2 million students.

The 2014–2015 academic year showed a significant decline in the number of universities, academies, and institutes. Such processes were undoubtedly caused by the annexation of the Crimean Peninsula and Russia's armed aggression in Eastern Ukraine. In subsequent years, the figure showed slight fluctuations. As of 2024, the number of higher education institutions (universities, academies, institutes) was 633. According to the Unified State Electronic Database on Education (USEDE), during the 2023 admission campaign, 1,379,350 electronic applications (531,440 applicants) and 66,620 paper applications (56,417 applicants) were submitted.

### **Accreditation system before 2019**

The accreditation system in Ukraine was established in 1991 to provide for state regulation of the provision of educational services and to protect the interests of their consumers. Several regulatory changes have been

made since then, but the accreditation procedure has remained inextricably linked to licensing processes. In fact, accreditation provided for the verification of quantitative indicators required by the licensing conditions. Refusal of accreditation meant the cancelling of a license and, consequently, the cessation of educational activities in the given specialty.

The existing system was very complex and provided for licensing of specialties (areas), accreditation of specialties (areas), and accreditation of the institution as a whole. Each procedure provided for the implementation of inconsistent and often contradictory instructions and required the preparation of numerous paper reports (about 300 pages). Criteria and requirements for licensing and accreditation were excessively complicated, did not take into account the peculiarities of different areas of training, were interpreted differently by experts, and ensued in complex and non-transparent calculations. The general approach was to control, not to trust.

Despite the declaration of voluntary participation in accreditation by universities, existing practices made such participation mandatory as only accredited specialties had the right to issue a state diploma. HEIs did not have the right to issue their own educational documents.

Accreditation of HEIs was carried out through the examination of professional councils. At the stage of formation of the accreditation system in Ukraine they operated on the basis of leading educational institutions and prepared an expert opinion, the basis for decision-making. However, this approach showed a number of shortcomings. The primary one was monopolization when each specialty was assessed as a competitor at the market of educational services. At the same time, the development of branch networks and training and counselling centres throughout Ukraine was typical. Such aggressive management of individual HEIs was not supported by logistical, informational or personnel indicators, which, of course, led to a decrease in the quality of higher education.

The next step in the transformation of accreditation approaches was the establishment of state expert councils under the Department of Licensing and Accreditation of the Ministry of Education and Science under the supervision of the Deputy Minister. Decisions were made by the State Accreditation Commission of Ukraine (SAC) chaired by the Minister. The State Accreditation Commission was dominated by influential heads of state higher education institutions and civil servants. Information on the activities of the SAC was not available to society; accreditation decisions were normative and were not made public.

The changes adopted in 2014 eliminated the expert councils, instead launching a single intersectoral expert council, which included one representative from each industry and considered only “problematic” cases. For the first time, students became involved in the accreditation procedure.

Despite organizational changes, which, for the most part, concerned the division of powers, approaches to evaluation remained unchanged. The structure of the accreditation case included self-analysis in ten sections: 1. General characteristics of the department; 2. The structure of training and formation of the contingent of students; 3. Staffing of training; 4. Material and technical support for training; 5. Organizational, educational and methodological and informational support of training; 6. Qualitative characteristics of training; 7. Characteristics of research activity and work in postgraduate and doctoral studies; 8. International relations; 9. List of negative feedback (instructions) of controlling bodies and correction measures taken; 10. Grounds for accreditation.

In essence, the old accreditation procedure provided for the evaluation of the programme itself and the ability of the higher education institution to implement it. A key feature of accreditation in Ukraine until 2019 was the quantitative approach. Quantitative criteria provided for the compliance with state-established indicators — i.e., the availability of the appropriate percentage of teachers with research degrees, a certain number of textbooks, premises, computers and more. The advantage of quantitative criteria is that they are



clear and do not allow for misreadings; the disadvantage is that they are overly formalistic, and the existing procedures allow them to be easily falsified.

Summing up, we can say that the old accreditation system used a summative model with its inherent strategy of unification of study programmes. The key role in the evaluation processes was played by the Ministry of Education and Science, which emphasized the accountability of this institution. Accreditation was compulsory, perceived by universities as an inspection by a controlling institution with high corruption risks. Study programmes did not receive any recommendations. Post-accreditation monitoring was insignificant and used solely for repressive purposes.

Thus, in implementing the new accreditation system NAQA aimed to introduce a new philosophy of accreditation as an advisory assessment based on European standards (ESG-2015) and minimizing all the risks mentioned above, and to correct the shortcomings that existed in the old accreditation system.

### **3.1 Students and doctoral applicants**

According to the State Statistics Committee of Ukraine, the total number of students, including PhD and Doctor of Science (DS) candidates, has been gradually declining since 2008. Namely, at the beginning of the 1990–1991 academic year, 881,300 higher education degree seekers studied in Ukrainian HEIs (universities, academies, institutes). The number of students reached its highest point in 2007–2008, with a total of 2,372,500. Following that, there was a gradual decline.

The decrease in the number of applicants for higher education is quite natural; its reasons are the same as those that led to a decrease in the number of HEIs: demographics and economic crises, the annexation of Crimea and the military aggression of the Russian Federation in Eastern Ukraine. In the coming years, if we do not attract international students, the decrease in the number of higher education institutions and the number of applicants for higher education will continue.

As of January 1, 2024, there were 1,169,209 students in higher education institutions and scientific institutions in Ukraine, and according to open data from the USEDE, there were 7,518 students studying in institutions of professional pre-higher education. So, in total, there are 1,176,727 students.

More than a third of students obtain higher education at the expense of state or local budgets (hereinafter - budget) - 401,578 (34.18%) compared to 771,381 (65.66%) students at the expense of individuals and legal entities (hereinafter - contract). Also, less than 1% of study on a voucher - 1,870, on a preferential long-term loan - 18, on a targeted preferential state loan - 2.

The distribution by form of study is as follows: 907,961 (77.28%) study on a full-time basis 259,771 (22.11%) extramural students. Also, less than 1% of study in the evening form - 4,082, remotely - 2,307, outside the postgraduate programme - 728.

The students distribution by level of higher education is as follows: 1,617 people (< 1%) "junior bachelor", 781,286 people (67%), "specialist" - 159 people (< 1%), "master" - 343,772 people (29%), "doctor of arts" - 162 people (< 1%), "doctor of philosophy" - 47,853 people (4%).

The regional distribution of students correlated with the regional distribution of educational institutions - 25.3% study in Kyiv, 10.6% in Kharkiv region, 9.4% in Lviv region, 6.8% in Dnipropetrovsk region, and 6.4% in Odesa region.

## **4. History, profile and activities of the agency**

### **4.1 History of the agency**

As a permanent collegial body, NAQA was founded by the Resolution of the Cabinet of Ministers of Ukraine No. 244 of April, 15, 2015, according to the Law of Ukraine “On higher education” of July, 1, 2014.

The first staff set of the agency was elected in 2015, however, for a variety of reasons it never started its official work. In December 2018, according to the amended Law of Ukraine “On Education”, the new staff for NAQA was selected by an International competition commission and approved by the Cabinet of Ministers of Ukraine. In the end of February 2019, NAQA formally commenced its activities, elected the Head of the Secretariat and began the selection and appointment of its staff.

Because of martial law in Ukraine caused by full-scale Russian invasion of Ukraine in February 2022 the temporary composition of NAQA Board continues its work until the end of the martial law.

### **4.2 Mission and Strategy**

NAQA’s mission is to ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders.

NAQA’s strategic goals

To become full member of the European Association for Quality Assurance in Higher Education (ENQA) and to be registered in the European Quality Assurance Register for Higher Education (EQAR);

To modernise external higher education quality assurance system, in particular, through developing the institutional accreditation model and launching the independent institutions for higher education quality evaluation;

To encourage innovative practices in HEIs in the interaction of research, education, and business.

#### **NAQA’s values:**

Partnership – collaboration based on equality and respecting partners.

Innovation – new ideas, technologies, and techniques production and implementation related to higher education quality assurance.

Responsibility – conscious attitude to the consequences of actions and decisions taken.

Integrity – commitment to moral principles and standards.

Openness – readiness to cooperate with all stakeholders.

Transparency – willingness to provide public with complete and objective information on the higher education quality in Ukraine and the results of the Agency’s activities to ensure it.

Independence – full and effective higher education quality assurance without outside influence.

Professionalism – consistency of achieving high standards in higher education quality assurance using professional knowledge and experience.

Trust – confidence that participants of the quality assurance process honestly perform their duties.

Principles of the internal culture of the organization:

Respect for everyone’s opinion, collegiality, and desire for consensus;

Striving for self-improvement, and self-development based on critical self-assessment;

Cultivating a spirit of mutual support, sincerity, and initiative;

Building and maintaining institutional and personal reputation.

### **4.3 Organisational structure**

According to the Charter, NAQA consists of 23 persons who are appointed by the Cabinet of Ministers of Ukraine on the basis of the decision of the International competition commission based on the results of competitive selection, which is carried out in accordance with the principles of gender balance and branch representation. To date, two elected members have resigned due to different reasons.

The membership of NAQA is formed with no more than one person from each subject field; it includes three representatives of all-Ukrainian associations of employers' organisations; two persons from among students of the first and second cycle of higher education; no less than one representative from each of the following: the National Academy of Sciences, each of the national sectoral academies of sciences (one representative from each academy), state, communal and private higher education institutions.

The term of office for NAQA members is three years. The same person may not be a member of NAQA for more than two terms.

NAQA members work in committees and competition commission. Each NAQA member is assigned to a certain Sectoral Expert Council (hereinafter SEC) and is responsible for their effective operation. The main responsibilities of NAQA members are to:

- Participate in the work of committees and commissions.
- Coordinate the work of SEC assigned to them.
- Study the accreditation cases.
- Participate in the work of the conciliation council (in person or remotely) before the NAQA meeting.
- Perform the duties of an observer at the accreditation audit.
- Make proposals and participate in the discussion of NAQA regulations and recommendations.

Additional responsibilities are the following:

- To advise HEIs, SECs and NAQA experts on best practices for higher education quality assurance, as well as on their professional expertise.
- To participate in the preparation and holding of conferences, seminars, round tables on quality assurance in higher education.

There are 5 committees in NAQA:

1. Appeals committee. Scope of activities: considers appeals regarding the work and decisions of SECs, expert panels, and experts and makes relevant submissions to NAQA; performs other functions assigned to it by NAQA.
2. Ethics committee. Scope of activities: considers the violation of academic integrity within the framework of the current legislation; considers complaints (reports) on the detection of academic plagiarism, fabrications, falsifications and makes relevant submissions to NAQA; performs other functions assigned to it by NAQA.
3. One-time Specialised Academic Councils committee. Scope of activities: considers appeals, applications and complaints regarding violations of the procedure for defending a thesis for the degree of Doctor of Philosophy; performs other functions assigned to it by NAQA.

4. Military Education Committee. Scope of activities: considers issues related to improving the quality of higher education in higher military educational institutions, higher education institutions with specific conditions of education; performs other functions assigned to it by NAQA.

And according to the Regulations on the Committees of the National Agency for Higher Education Quality Assurance, which were approved during NAQA Board meeting on January 14, 2025 the Study Programme Accreditation Committee was established.

5. Study Programme Accreditation Committee. Scope of activities: considers applications for provision of one-year conditional accreditation of study programmes without conducting or with partial conducting of an accreditation in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 295 of March 16, 2022 “On the peculiarities of accreditation of study programmes under martial law” and makes corresponding submissions to NAQA; performs other functions assigned to it by NAQA.

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 NAQA. Officially, it has started its work in November 2024. The main scope of Appeals Chamber activities is consideration of appeals against decisions of NAQA. The Appeals Chamber is formed of five members. Members of the Appeals Chamber are elected for a term of two years on a competitive basis and perform the functions assigned to them on the basis of civil law contracts concluded with them. NAQA Board members cannot be elected to the Appeals Chamber.

NAQA Advisory Board was established by NAQA decision of November 17, 2020. It consists of leading foreign specialists who are recognized experts in the field of quality assurance in higher education to consider issues that require expert evaluation, proposals, consultations or professional evaluation of draft documents submitted to the NAQA.

The tasks of the Advisory Board are:

- establishing dialogue between the National Agency and its stakeholders;
- implementation of international standards in the field of higher education quality assurance;
- strengthening of international cooperation;
- preliminary discussion of issues deemed within the realm of expertise of NAQA;
- consultancy and expert assessments of developed draft documents and procedures;
- development of proposals on means, mechanisms, and ways of resolving controversial issues that arise as part of the activities of NAQA;
- implementation of oversight of the activities of NAQA.

Organizational, financial, economic, logistical, information and other support for the activities of NAQA are provided by the Secretariat. Today the structure of the Secretariat is as follows:

- Management of Secretariat;
- Study Programme Accreditation Department;
- Expert Support Department;
- Support of Sectoral Expert Councils (SECs) Department;
- Academic Integrity and One-time Councils’ Operation Department;
- Preparation of Meetings and Support of the Committees’ Department;
- Legal Department;
- Leading Specialist on Anti-Corruption Activities;
- Analytics and Training Support Department;
- Accounting and Financial Support Department;
- HR Department;

- PR and International Cooperation Department;
- IT Department;
- Records Management Sector;
- Material and Technical Support Sector.

In total, as for the January 2025 there are 59 staff units.

NAQA's Organizational Structure is available in the list of Annexes (Annex B).

Experts and members of sectoral expert councils are inextricably linked to NAQA activities.

A NAQA expert is a specialist who carries out the accreditation examination of the study programme in a higher education institution.

An expert is a person who has the necessary knowledge and expertise that allow him/her to effectively assess the quality of study programmes and educational activities of higher education institutions under these programmes and develop recommendations for improving the quality of higher education in relevant specialties.

Experts are selected from among research and teaching staff, as well as from among higher education degree seekers. These experts are trained by NAQA.

SECs are permanent NAQA bodies. They consist of 9 to 15 members in accordance with the Regulations on Sectoral Expert Councils and are selected on the basis of a competition in accordance with the Procedure for nominating candidates and selecting members of branch expert councils.

The main function of SEC is to process accreditation cases and prepare expert opinions on the possibility of accreditation of study programmes in accordance with the procedure defined by the Regulations on accreditation of study programmes.

Other functions of SEC include:

- participation in the coordination of higher education standards;
- preparation of proposals for improving the requirements for the quality assurance system of HEIs, criteria for assessing the quality of study programmes and educational activities of HEIs;
- interaction of the Agency with stakeholders on issues within their competence;
- participation in the approval of HE standards in the manner prescribed by the Agency;
- development of recommendations for HEIs on improving the quality of study programmes within the relevant areas.

According to the Regulations on Sectoral Expert Councils, the members of SEC are not only research and teaching staff but also stakeholders (employers and students) who are full partners in the process of ensuring the quality of higher education in Ukraine. The involvement of employers' representatives in the SEC provided a link between the HEIs and the modern labour market.

### **NAQA activities**

NAQA's main areas of work within the scope of the ESG include:

- accreditation of study programmes (bachelor, master, PhD);
- accreditation of thesis defence committees;
- accreditation of independent agencies;
- institutional accreditation of higher education institutions (HEIs);
- development of university rankings;
- compliance with academic integrity;

- other activities (annual reporting on the state of higher education in Ukraine, development of education policy regulations, approval of HE standards etc.).

NAQA milestones (Annex C)

#### 4.4 Activities of the Agency

NAQA's main areas of work within the scope of the ESG are outlined below and set out in more detail in Section 6. The authority of NAQA includes the following areas: accreditation of study programmes (bachelor, master, PhD); accreditation of thesis defence committees; accreditation of independent agencies; institutional accreditation of higher education institutions (HEIs); development of university rankings; compliance with academic integrity; and other activities (Annual Report on the State of Higher Education in Ukraine, development of education policy regulations, approval of HE standards etc.).

NAQA started its official work in February 2019 and has since conducted the following activities.

##### Organizational activities

NAQA Secretariat was formed and launched; 29 Sectoral Experts Councils were formed. The next stage was the training of a team of 35 trainers, which took place in the summer of 2019 with the help of Quality Assurance Agency in Higher Education of the United Kingdom (QAA). At the same time, NAQA created an online course for future experts and members of sectoral expert councils. X people received certificates of successful completion of online training and were admitted to face-to-face training. A total of 350 trainings were conducted from 2019 till December 2024. An electronic document management system has also been developed and is being implemented.

NAQA builds and develops sustainable cooperation with external stakeholders and actively provides informational and advisory support to stakeholders. In general, NAQA conducted 1500+ QA events for stakeholders in different formats e.g. seminars, webinars, round tables, forums, workshops, etc.

##### Accreditation of Study Programmes:

In 2023 NAQA completed 1561 accreditations of study programmes:

- Approved — 1391,
- Conditional — 163,
- Denied — 4,
- Exemplary — 22.

##### Document development

The Regulations on Study Programmes Accreditation was developed by NAQA and officially approved by the Ministry of Education and Ministry of Justice; all supporting documents and guidelines including self-assessment form were developed and made available on the NAQA website. Having analysed the work under the Regulation and to fully comply with the ESG, NAQA developed new Regulations on Study Programmes Accreditation, which were approved by the Ministry of Education and Science of Ukraine in May 2024 and entered into force on August 1, 2024. Additionally, NAQA has developed all supporting documents, in particular Methodological guidelines "Clarifications on the Application of the Criteria for Assessing the Quality of Study Programmes".

Procedure for considering notifications regarding violations of the dissertation defense procedure for awarding the degree of Doctor of Philosophy (Approved by NAQA Board Decision on June 25, 2024), Procedure for awarding the degree of Doctor of Philosophy (Resolution of the Cabinet of Ministers of Ukraine dated 12.01.2022 No. 44), Procedure for considering complaints/reports regarding facts of academic



plagiarism, fabrication, falsification (Approved by NAQA Board decision with the changes on October 22, 2024) were developed and approved. The Recommendations of NAQA on the introduction of an internal quality assurance system and the Recommendations for HEIs on the development of academic integrity systems were also adopted; key documents were translated into English and posted on the NAQA website; the full list of accreditation documents is available in Ukrainian. The Regulations “On the Appeals Chamber of the National Agency for Higher Education Quality Assurance”, approved by the Ministry of Education and Science in December 2023 were developed by NAQA. It worth to be noting, that all stakeholders are involved in the development of regulatory documents.

### **Consulting and Trainings activities**

The first trainings were organized jointly with the Quality Assurance Agency for Higher Education (QAA), during which 35 trainers were trained. NAQA conducted more than 350 trainings for accreditation experts and sectoral experts, 101 seminars and round tables for representatives of Ukrainian higher education institutions, 49 consultative meetings at Universities’ requests.

### **External Evaluation and Self-Assessment**

NAQA aims to be self-critical and self-reflective and also welcomes external evaluation and reviews of its activities. NAQA constantly collects feedback from Universities, experts, and other stakeholders via surveys, interviews, etc. and revises its policies, guidelines and documents on the basis of this feedback. NAQA constantly seeks international evaluation and assessment of its policies and documents: for instance, in the study "Ukraine and Association Agreement: Implementation Monitoring 2014-2022", the NGO "Ukrainian Centre for European Policy" and the Konrad Adenauer Stiftung Office in Ukraine noted the NAQA’s activities in implementing ESG.

This self-assessment report also aims to conduct a critical self-analysis and obtain the opinion of national and international stakeholders on the activities of the agency in the period from February 2019 to May 2025.

### **Communications activities (public relations)**

NAQA actively provides information and advisory support to stakeholders. In addition to the trainings, seminars, round tables, meetings mentioned above, NAQA is active in the media. All news is regularly published on NAQA’s website and official Facebook, LinkedIn, X pages and Telegram and YouTube channel together with advisory information on topics of interest to stakeholders, records of NAQA Board meetings and events.

In total, more than 280 news were published on the official NAQA website in 2024. According to the Google Analytics, NAQA website was visited by 201 306 users in 2024, who made 696 000 views. In 2024, NAQA Facebook page covered 288 034 users. In 2024, the number of visits of the official Facebook page was 18 733. In 2024 the number of NAQA’s Telegram page subscribers was 1501 and the average number of views per post is 1650.

In total, 73 publications on X in 2024 had 10351 views. On LinkedIn, in 2024 the number of subscribers was 876, 1636 reactions to publications were recorded. In 2024, in general 23 videos were published. 14 were NAQA Board meetings broadcasts and 9 videos, in particular webinars. The number of NAQA’s YouTube channel subscribers is 1574.

NAQA has revised its Communication Strategy during the Strategic session in April 2024. The agency developed and approved in August 2024 the updated Communication Strategy which contains SWOT analysis of current state in the sphere of communications, indicates the key audience, includes the main channels of communication of NAQA, categories for social networks, visual style, list of honorary awards of the agency and key messages which should be integrated.

## 5. NAQA's quality assurance processes and methodology

NAQA has been carrying out external quality assurance activities at different levels. The main external quality assurance activity is accreditation of bachelor, master and PhD programmes.

According to the Law "On Higher Education", accreditation of a study programme involves the evaluation of a study programme and/or educational activity of a higher education institution under this programme in order to ensure and improve the quality of higher education. Accreditation of a study programme is mandatory as the document on higher education (diploma) is issued by a higher education institution only for accredited study programmes.

### Accreditation process for study programmes

Regulations on Accreditation of Study Programmes determines the basic principles and procedures for accreditation of study programmes as a tool for external quality assurance of higher education in Ukraine. Mandatory conditions for accreditation are the compliance of the study programme and educational activities of the higher education institution under this study programme with the criteria for assessing the study programme quality, which are an integral part of the Regulations.

The process of accreditation of study programmes is detailed in Section 7: ESG 2.3: Implementation Processes).

A systemic approach to the quality of higher education in Ukraine has ensured that NAQA has launched and operated appropriate processes, procedures and measures for continuous and consistent improvement of the education quality.

The evaluation of a specific study programme and educational activities under this programme is carried out according to the criteria set by NAQA and the order of the Ministry of Education and Science (from 15.05.2024 No. 686).

Criteria for evaluating the study programme:

1. Design of study programme
2. The structure and content of the study programme
3. Access to the study programme and recognition of learning outcomes
4. Learning and teaching according to the study programme
5. Control measures, evaluation of students and academic integrity
6. Human resources
7. Educational environment and material resources
8. Internal quality assurance of the study programme
9. Transparency and publicity
10. Learning through research

The eighth criterion is devoted to ensuring the quality of this study programme and has seven sub-criteria.

1. The higher educational institution consistently conducts its established procedures for the development, approval, monitoring and periodic review of the study programme.
2. Students directly and through student self-government bodies are involved in the process of periodic review of the study programme and other procedures to ensure its quality as partners. Proposals of students is taken into account when reviewing the study programme.
3. Employers are directly and / or through their associations involved in the process of periodic review of the study programme and other procedures to ensure its quality as partners.
4. There is a practice of collecting, analyzing and considering information on the career path of the study programme graduates (except in the case of the first-time accreditation).



5. The quality assurance system of the higher educational institution ensures timely response to the monitoring results of the study programme and/or educational activities for the implementation of the study programme, in particular, carried out through a stakeholder survey.
6. The results of external quality assurance in higher education (including comments and recommendations formulated during previous accreditations) are taken into account when revising the study programme.
7. The academic community of the higher educational institution forms a culture of quality education that contributes to the continuous development of the study programme and educational activities under this programme.

The fifth sub-criterion allows to assess the existence of a quality assurance system in the HEI and its ability to provide timely response to identified shortcomings in the study programme, or educational activities for its implementation.

The practice of applying the eighth criterion, and especially the fifth sub-criterion, by experts and SECs during the accreditation process shows that this issue deserves additional attention from all stakeholders.

### **Accreditation during the wartime**

On February 24, 2022, Russia began a massive military invasion against Ukraine. The terrorist state continues to commit brutal crimes on our territory, destroying cities and taking people's lives every day.

With the Russia's full scale invasion, a Temporary Accreditation Procedure for Study Programmes was approved, allowing the adaptation of processes to the extraordinary conditions while maintaining stability and quality. According to the Resolution of the Cabinet of Ministers of Ukraine, NAQA has developed the Temporary Accreditation Procedure for Study Programmes Under Martial Law, approved by the decision of NAQA dated April 14, 2022 (Protocol No. 6(11)), HEIs were allowed to undergo a simplified procedure with the adoption of a decision on one-year conditional accreditation without conducting or with partial conducting of panel visit. This one-year conditional accreditation is an exceptional measure and response to the war conditions.

With the adoption of the new Regulations on Accreditation of Study Programmes in Higher Education, starting from September 2024 all study programmes which applied for the accreditation should go through the full procedure with face-to-face or hybrid site visit, except very extraordinary cases and security circumstances. In NAQA formed a Commission for consideration of applications of higher education institutions for granting one-year conditional accreditation in accordance with the Resolution of the Cabinet of Ministers of Ukraine dated March 16, 2022 No. 295. This commission was engaged in reviewing applications of HEIs for obtaining one-year conditional accreditation. Thus, in the first semester of the 2024-2025 academic year, the commission received 214 letters from the HEIs with the request to receive a one-year conditional accreditation for 770 study programmes. The main factors motivating HEIs to apply for this procedure are in particular significant damage to the material and technical base caused by the war, relocation of the institution from temporarily occupied territories or front-line areas. Since January 2025 NAQA's Study Programme Accreditation Committee is responsible for considerations of such requests.

### **Accreditation methodology**

NAQA bases its activities on the principles of trust and mutual respect, aiming to disseminate them in the Ukrainian academic environment. These principles should lay the foundation for the reputational capital of Ukrainian higher education institutions, along with a new culture of quality and integrity. In the process of accreditation, NAQA performs not a punitive but first and foremost a service function, implementing the paradigm of consultative evaluation and assisting HEIs in their pursuit of excellence. And for this we need to establish a constant dialogue and fruitful cooperation.

Methodological guidelines "Clarifications on the Application of the Criteria for Assessing the Quality of Study Programmes" were developed for NAQA experts.

In general, the accreditation methodology used by the NAQA is in line with European standards. However, there are some problems, including the following:

- in a number of cases, the assessments of the sectoral expert council do not coincide with the assessments of the expert group;
- there are cases when NAQA has to return the opinion of the sectoral expert council for revision to establish clear and detailed justifications for changing assessments previously provided by the expert group;
- the reports of some expert groups do not provide a sufficient number of recommendations for the HEI to improve the quality of the educational process or the recommendations are not clear or are too general in nature.

## 6. NAQA's internal quality assurance procedures

NAQA is accountable to stakeholders through a comprehensive range of internal quality assurance mechanisms. These are discussed in detail in Section 8: Standard 3.6 and include the following:

- performance management and accountability
- assurance of internal controls
- equality
- information security and accessibility
- avoiding conflicts of interest
- feedback and reflection mechanisms
- critical self-assessment

In writing this self-assessment report, the working group concluded that NAQA's internal quality assurance procedures at this stage are systematic and consistent.

## 7. NAQA's international activities

One of NAQA's strategic objectives is the internationalization of higher education in Ukraine in general and the activities of NAQA in particular. The work towards this goal is conducted in several aspects.

### Cooperation with foreign agencies for quality assurance and other stakeholders

During its active work since 2019, NAQA has actively developed international cooperation, in particular, by signing bilateral agreements with foreign quality assurance agencies. On this stage NAQA signed 15 memorandums of cooperation/understanding with European QA agencies. The result of such cooperation gives a large number of opportunities for both agencies, in particular to exchange best practices in external quality assurance, development joint initiatives in QA development, revision and improvement of key procedures and documents, development of new draft regulations and guidelines, advice of international experts on the quality of higher education.

One of the successful cases after signing the memorandum is the cooperation between NAQA and HAKA (Estonia). After signing the memorandum of cooperation in autumn 2024, work began on developing a joint project to pilot institutional accreditation in Ukraine. In 2025 the project received funding from the Estonian Centre for International Development (ESTDEV) and HAKA together with NAQA implement Estonian-Ukrainian project, during which three Ukrainian universities are undergoing a full institutional accreditation procedure.

Since 2019 NAQA also cooperates with USAID, OSCE and has joint projects which meet the issues related to the higher education quality assurance.

All events and their results are widely covered on NAQA website as well as on its official social media pages.

### Membership in international organizations

NAQA has set a goal to become a full member of ENQA (European Network for Quality Assurance) and to enter EQAR (European Quality Assurance Registrar). NAQA actively participates in all European QA events such as European Quality Assurance Forum (EQAF), ENQA General Assembly and other important QA events. In June, NAQA was granted an affiliate status with ENQA. In February 2020, NAQA gained full membership in INQAAHE (International Network for Quality Assurance Agencies in Higher Education). In July, NAQA became a member of the International Center for Academic Integrity (ICAI). Besides, on July 17, 2020, NAQA was granted full membership in the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEENQA), in May 2022, NAQA became the European Network for Academic Integrity (ENAI) member and in October 2022, NAQA received a full membership in Global Academic Integrity Network (GAIN).

### International projects and support from international donors

As of January 2025, NAQA is a full partner of 8 Erasmus+ projects aimed at the development of higher education in various fields.

1. "Open Practices, Transparency and Integrity for Modern Academia" (OPTIMA) project aims to develop and promote the open science and academic integrity;
2. "Simulation medicine and Scenario-based learning for emergency care" (SimS) project aims to improve the first aid and medical emergency care education system by implementing innovative integrating learning activities including scenario-based learning, simulation medicine, and competent psychological support (SBL/SM/PsS) for physicians;
3. Students' Personalised Learning Model (SMART-PL) project focused on introducing a model of personalized learning, based on the virtual learning environment of Intellectual Tutoring "Learning with No Limits";

4. Digital University—Open Ukrainian Initiative (DigiUni) project. The main goal of it is to create a highly efficient digital educational ecosystem for distance and inclusive learning. DigiUni covers all educational levels and will promote adult education and lifelong learning through formal, non-formal and informal digital education;
5. Supporting European QA Agencies in meeting the ESG (SEQA-ESG) II. NAQA participation in the project is important for the creation of an ESG-compliant QA system, which is one of the Bologna Process key commitments. The project partnership is strong support from ENQA as project coordinator and project partners towards the National Agency's full membership of ENQA;
6. Disaster Resilience in Higher Education Systems via Cloud University Model (CLOUD HED) project aims to enhance the understanding of HE system challenges in crises, in particular in conditions of armed conflicts, as well as to provide a whole-university concept, enabling HEIs to provide their education mission via a Cloud University Model;
7. Digital Transformation for Medical Education in Ukraine (UkraineDigiTrans) aims to develop the electronic healthcare system (EHS) in Ukraine, coupled with the widespread use of digital technologies in medicine, encourage medical professionals to embrace new digital solutions and tools. Its objectives include the enhancement of pedagogical mastery and an increase in the levels of professional competencies and educational resilience of the teaching staff;
8. Developing Micro-credentials Ecosystems in Ukraine and Mongolia for Competitive and Resilient Green Economies (DOMANI) project. DOMANI aims to build an educational partnership between twelve EU, Ukrainian and Mongolian institutions to launch micro-credentials ecosystems in both Ukraine and Mongolia for competitive and resilient green economies.

Additionally, in 2021 the "Implementation of Education Quality Assurance System via Cooperation of University- Business-Government in HEIs" (EDUQAS) project was completed. EDUQAS was aimed to improve education quality assurance systems through development of efficient internal quality standards leading to better employability of students in Partner Countries Universities.

NAQA is actively cooperates with Polish National Agency for Academic Exchanges (NAWA). Thus, one-year projects "Green Transition for Ukrainian Universities" (GTUA) (completed at the beginning of 2024) and "Education for Green Transition" (GTUA-EDU) (completed at the beginning of 2025) were aimed to support 7 Ukrainian HEIs in implementing of green standards in their institutions. It will contribute to the process of post-war reconstruction of the country, and will also be an important step in its integration into the European Union.

Another one project supported by SI Baltic Sea Neighbourhood Programme and coordinated by the Royal Institute of Technology (KTH) Stockholm, "Sweden is Strengthening PhD education in Ukraine for sustainable growth of academic careers" (TALENT4UA). The overall goal of TALENT4UA is to use EU experience and standards to establish at Ukrainian universities an attractive and supportive environment for developing a new generation of PhD students to become independent researchers and pursue their careers as academics, researchers, and innovators in post-war Ukraine.

A joint HAKA and NAQA project "Enhancement of Higher Education Quality in Ukraine" is financed by Estonian Centre for International Development (ESTDEV). The aim of the project is to support NAQA in developing and implementing of the model for institutional accreditation of higher education institutions. The expected result will be an institutional accreditation model in line with European standards and guidelines (ESG) and taking into account the local context.

Since 2019 NAQA actively collaborates with OSCE Project Co-ordinator in Ukraine. The OSCE Project Co-ordinator supports Ukraine's reforms and helps the country meet crisis-related challenges. Its projects actively contribute to major transformations, critical for the stable and democratic future of the country.

Together with OSCE NAQA has realized a number of initiatives and projects, in particular in 2019 NAQA representatives met with Italian National Agency for the Evaluation of Universities and Research Institutes (ANVUR) top management to learn more about institutional and study programme accreditation, academic integrity and other QA activities in Italy. The project “Promoting Rule of Law and Human Rights Approaches in Higher Education” which were implemented in 2020 was aimed at implementing state policy in the field of quality assurance in higher education and creating requirements for internal quality standards of education. It aimed, in particular, to develop and implement recommendations for the organisation of the internal quality assurance system of higher education institutions in Ukraine. The project “Improving human rights-based approaches in higher education” was implemented by the OSCE Project Co-ordinator in Ukraine in 2021. The project aimed to improve human rights-based approaches, as well as higher education quality standards. The project envisages research on international practices in the field of institutional accreditation, as well as support in the development of guidelines for institutional accreditation, according to international best practices. In 2024 NAQA’s cooperation with the OSCE Project Co-ordinator continued and in spring 2024 NAQA strategic session were organized and supported by OSCE.

In addition, NAQA collaborates with British Council in Ukraine, American Councils for international education, USAID New Justice Programme, International Education Research Foundation, and other international organisations and institutions.

## Section 7: ESG (Part II)

### ESG Standard 2.1 Consideration of internal quality assurance

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

Adopting the Law of Ukraine on Higher Education in 2014 became the starting point for the major reform of higher education quality assurance in Ukraine. For the first time, the Ukrainian legal framework has introduced regulations requiring procedures for ensuring the quality of higher education to follow standards and recommendations for quality assurance in the EHEA (Sec. 3, Art. 16 of the Law of Ukraine on Higher Education). The system for internal quality assurance provides for the implementation of the following procedures and measures:

- 1) determination of the principles and procedures for ensuring the quality of higher education;
- 2) monitoring and periodic review of study programmes;
- 4) provisional development of scientific-teaching and teaching staff;
- 5) ensuring the availability of the necessary resources;
- 6) ensuring the availability of information systems for effective management of the educational process;
- 7) ensuring publicity of information about study programmes, higher education degrees, and qualifications;
- 8) ensuring compliance with academic integrity principles.

The processes and standards for the external quality assessment of the study programme are explicitly outlined in the Regulation on Accreditation of Study Programmes in Higher Education, which was officially approved by the Ministry of Education and Science of Ukraine (ref. N 686 dated 15.05.2024). The Law of Ukraine on Higher Education, Article 18, explicitly grants the NAQA the authority to develop regulations and methodologies for accreditation. The Law of Ukraine on Higher Education, Article 18, explicitly grants the NAQA the authority to establish regulations and methodologies for accreditation.

The methodology used by NAQA for external quality assurance of higher education was designed following the ESG-2015 standards, acknowledging the HEI's responsibility for the quality of their study programmes. For NAQA, it was of primary importance that the criteria for evaluating study programmes stimulate the development of HEIs' internal quality assurance systems. Therefore, the established criteria consider the standards and guidelines for internal quality assurance, as outlined in Part 1 of the ESG (see Annex D (Table 1. Compliance of the NAQA study programme accreditation criteria with ESG 2015, part 1).

**1.1. Policy for quality assurance.** *The external evaluation criteria include an assessment of the HEI's quality assurance policy that fosters a quality culture (subcriterion 8.8) and well-defined processes for the development, approval, monitoring, and periodic evaluation of the study programme (subcriterion 8.1). HEI should indicate that its quality assurance system is responsive to shortcomings identified (subcriterion 8.5) and recommendations post external quality assurance (subcriterion 8.6). Quality assurance policies and procedures for study programme development and periodic review should involve students (subcriterion 8.2) and employers (subcriterion 8.3) and take into account information about the career path of graduates (subcriterion 8.4). Developing unambiguous and accessible policies, criteria, and procedures to uphold academic integrity and implementing them effectively is crucial for HEIs to nurture an internal culture of quality (subcriteria 5.4, 10.7).*



**1.2. Design and approval of programmes.** External evaluation of the study programme involves analysing the HEI's processes for designing and approving study programmes (Criterion 1). The study programme should allow students to meet the learning objectives set by the Higher Education Standard for the specific level of higher education (if available) and the National Qualifications Framework criteria aligned with the EHEA Qualifications Framework (subcriterion 1.1). It must go through an official approval process within the institution (subcriterion 1.1), have a well-defined objective aligned with the university's mission and strategy (subcriterion 1.3), and include clear learning goals (subcriterion 1.1). Study programmes should be designed with consideration of the needs of interested parties (subcriterion 1.4), benefiting from external expertise (subcriterion 1.5), and encompassing both theoretical knowledge and adaptable skills (subcriteria 2.2 and 2.6). It should facilitate seamless student advancement (subcriterion 2.2), establish the anticipated student workload in ECTS credits (subcriteria 2.1 and 2.7), and incorporate structured internship opportunities (subcriterion 2.5). The qualification resulting from a programme should be specified and communicated (subcriteria 1.1, 1.2) and refer to the correct level of the National Qualifications Framework (subcriterion 5.2).

**1.3. Student-centred learning, teaching and assessment.** The external evaluation of the study programme includes confirmation of the student's active engagement in internal quality assurance procedures (subcriterion 8.2) and the development of the learning process (subcriteria 4.1, 4.3, 4.5). Student-centred learning and teaching (subcriterion 4.1), inquiry-based learning (subcriteria 4.3, 10.1, 10.4), flexible learning paths (subcriterion 2.4), fostering learner autonomy, and easily accessible and intelligible information about the objectives, subject matter, and learning outcomes, as well as the process and assessment standards within the study programme's components (subcriterion 4.2), must all be provided by HEI. HEI has to demonstrate clear and understandable rules for conducting control measures as well as the process for handling complaints and appeals from students (subcriterion 5.3). Forms of control measures and criteria for assessment and marking must be clear and understandable, establish the achievement of the learning outcomes, and be published in advance (subcriterion 5.1).

**1.4. Student admission, progression, recognition and certification.** The external evaluation criteria align with standard 1.4 and focus on the consistent implementation of redesigned and published laws encompassing every stage of the student "life cycle," including admission (subcriteria 3.1 and 3.2), progression (subcriteria 4.2, 5.1 and 5.3), certification (subcriterion 5.2), and recognition, including the recognition of higher education qualifications (subcriterion 3.3), non-formal and informal learning (subcriterion 3.4).

**1.5. Teaching staff.** The criteria for external evaluation correspond with standard 1.5 and involve the following aspects: the teaching staff's compliance with the study programme's requirements and their capacity to professionally deliver programme components (subcriterion 6.1); the openness and nondiscrimination of the process for the teaching staff recruitment (subcriterion 6.2); created opportunities for the professional development of teaching staff, particularly in the area of teaching skills development (subcriterion 6.4); and the participation of employer representatives in the educational process (subcriterion 6.3).

**1.6. Learning resources and student support.** The external evaluation includes an assessment of the HEI's learning environment and resources, with a focus on the following areas: the appropriate study programme's physical and methodological support (subcriterion 7.1), to which teachers and students have access (subcriterion 7.2); the safety of the learning environment for students' physical and mental health (subcriterion 7.3); the provision of educational, organizational, informational, advisory, and social support for students (subcriteria 7.4, 4.4); the establishment of conditions for the realization of the right to education for those with special educational needs (subcriterion 7.5); and standard operating procedures for anti-corruption policies and conflict resolution procedures (subcriterion 7.6).



**1.7. Information management.** *The established evaluation criteria encourage HEIs to create an efficient feedback system with employers (subcriterion 8.3) and students (subcriterion 8.2), monitor graduates' career paths (subcriterion 8.4), gather relevant information on activity indicators, and use it to manage their programmes and other educational activities efficiently while promptly addressing any shortcomings that are found (subcriterion 8.5).*

**1.8. Public information.** *The requirements for external programme evaluation align with standard 1.8, which calls for an examination of the data that HEIs publish regarding their activities (subcriterion 9.1). To inform the relevant interested parties and society, HEI promptly publishes accurate and trustworthy information about the study programme (the programme profile, curricula, etc.) on its official website (subcriterion 9.3).*

**1.9. Ongoing monitoring and periodic review of programmes.** *Criterion 8's requirements for internal quality assurance of the study programme align with those of Standard 1.9. The assessment entails examining the process for creating, approving, overseeing, and reviewing study programmes regularly (subcriterion 8.1). It also involves employers (subcriterion 8.3), students (subcriterion 8.2), and graduates (subcriterion 8.4). It considers the outcomes of external quality assurance (subcriterion 8.6) and consistent monitoring (subcriterion 8.5) when implementing internal quality assurance procedures. The established procedures should facilitate a culture of quality in HEIs (subcriterion 8.7).*

**1.10. Cyclical external quality assurance.** *In Ukraine, cyclical external quality assurance is obligatory since the study programme accreditation is a mandatory prerequisite for issuing a higher education diploma to a person who has completed the relevant study programme and passed certification (Sec. 6, Art. 7 of the Law of Ukraine on Higher Education).*

An equally important component of NAQA's activities is supporting institutional responsibility for higher education quality. Until 2019, most Ukrainian HEIs didn't pay significant attention to developing a systematic ESG-based approach to higher education quality assurance. In fact, the NAQA study programme accreditation procedure prompted Ukrainian HEIs to develop efficient internal quality assurance systems. Therefore, since the beginning of its activities, in addition to providing accreditation, NAQA has been investigating the actual state of internal quality assurance in the Ukrainian higher education system through collaborative research projects, annual reports on the quality of higher education, etc. It has also been developing recommendations for implementing institutional quality assurance systems and actively interacting with HEIs to disseminate information and providing advisory support to HEIs.

In 2019-2020, a project called "Integrating Principles of the Rule of Law and Human Rights into the Higher Education System" was undertaken with the support of the OSCE. It involved creating an analytical report, "Development of the internal quality assurance system in Ukrainian HEIs". Specifically, only 68.3% of the 183 Ukrainian HEIs surveyed in 2019 claimed to have an internal quality assurance system, while another 31.7% reported having some elements of such a system. 58.5% of survey participants started developing quality assurance systems only after 2014. Therefore, the "Recommendations regarding the organization of the internal system for quality assurance of study programmes and educational activities" were developed.

NAQA regularly organizes discussion forums tailored to specific regions and types of HEIs, along with thematic webinars and seminars focusing on study programme development, stakeholder participation, and building an academic integrity culture. Featuring speakers from the NAQA Board, secretariat, and HEIs, open online events (the School of Quality) have been conducted during 2020-2021 to disseminate best practices. In 2022, the International Online Forum "Quality Assurance of Higher Education in Wartime" was organized. At the forum, representatives from HEIs discussed overcoming challenges in assuring quality education during wartime. In 2023, NAQA started holding the Ukrainian Quality Assurance Forum (UQAF). UQAF served as a platform for HEI and educational organization presentations, showcasing best practices for developing the internal quality assurance system in higher education.

Table 2. NAQA activities for HEIs and other stakeholders during 2019-2024

Activities	2019	2020	2021	2022	2023	2024
Educational events (e.g. seminars, workshops, trainings, webinars, etc)	86	120	144	47	121	145
Meetings with HEIs'	82	56	66	68	75	117
NAQA School of Quality	-	10	6	-	-	-
Forums (organised and co-organised by NAQA)	2	4	-	6	14	11
<b>Total</b>	<b>170</b>	<b>190</b>	<b>216</b>	<b>121</b>	<b>210</b>	<b>273</b>

Thus, NAQA approach for external review of study programmes is based on ESG-2015 and developed in compliance with Ukrainian legislation. The accreditation procedure fully considers the standards in part 1 of the ESG-2015 while emphasizing the HEIs' responsibility for the quality of their study programmes and educational activities and the close relationship between internal and external quality assurance. The lack of existing strategies for managing quality assurance systems within Ukrainian HEIs posed the primary challenge for NAQA in upholding standard 2.1. The introduction of the NAQA accreditation procedure was what drove its genuine development. Consequently, while implementing the accreditation process that primarily looks at the effective functioning of the education quality assurance system, NAQA has been giving significant attention to educating and informing HEIs about the actual expectations for executing internal quality assurance procedures that align with ESG.

#### Legislative acts and Additional evidence:

- Law of Ukraine on Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/1556-18#Text>
- Regulations on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>
- Guidelines for Implementing the Internal Quality Assurance System for HEIs (in Ukrainian) <https://naqa.gov.ua/2019/07/%d1%80%d0%b5%d0%ba%d0%be%d0%bc%d0%b5%d0%bd%d0%b4%d0%b0%d1%86%d1%96%d1%97-%d0%bd%d0%b0%d1%86%d1%96%d0%be%d0%bd%d0%b0%d0%bb%d1%8c%d0%bd%d0%be%d0%b3%d0%be-%d0%b0%d0%b3%d0%b5%d0%bd%d1%82%d1%81%d1%82%d0%b2/>
- Recommendations regarding the organization of the internal system for quality assurance of study programmes and educational activities (in Ukrainian) <https://naqa.gov.ua/wp-content/uploads/2021/05/Рекомендації.pdf>
- Development of the internal quality assurance system in Ukrainian HEIs (in Ukrainian) <https://naqa.gov.ua/%D0%BE%D0%B1%D1%81%D1%94-2020/>

#### ESG Standard 2.2: Designing methodologies fit for purpose

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.

NAQA carries out periodic accreditation of bachelor, master, and doctoral study programmes. The accreditation procedure is performed for the first time, as a rule, during the last year of study of the first batch of students under the study programme. The next (regular) accreditation is carried out during the last year of the accreditation certificate validity (or during the term of conditional accreditation). HEI has the right to initiate the following accreditation ahead of time.

### **Methodological Framework**

External evaluation of study programmes of all levels is held according to the same methodology, based on the holistic approach, and focused on continuous improvement of the higher education quality. It involves qualitative evaluation to establish the compliance of the study programme with the specified criteria (which are a complex of subcriteria), as well as providing recommendations for further improvement.

The aims of accreditation are:

- 1) to identify quality compliance of the study programme, and educational activities under such programme, with the established criteria;
- 2) to assist HEIs in identifying strengths and weaknesses of the study programme and of the educational activities under such programme;
- 3) to provide stakeholders with objective information about the quality of the study programme and the educational activities under such programme;
- 4) to enhance trust in higher education in Ukraine;
- 5) to promote the integration of Ukraine's HEIs into the EHEA.

The methodology for the study programme external evaluation involves:

- Development of the self-assessment report by the HEI;
- External evaluation by the expert panel, including 1) analysis of the self-assessment report and materials attached; 2) determining compliance of the study programme's content with national legislative and regulatory requirements (e.g., with the higher education standard for the speciality); 3) generalizing of information related to the study programme and HEIs educational activities; 4) analysis of HEIs internal regulatory documents related to the study programme development and implementation; 5) site visit the HEI to clarify the facts indicated in the self-assessment report and interview the educational process actors about the study programme; 6) external evaluation report development; 7) provision of the recommendations for improving the quality of the study programme and HEI's educational activities;
- Consideration by the SEC: analysis of the accreditation case and preparation of the SEC report, which contains grounding for NAQA decision;
- Decision-making by NAQA Board: consideration of the SEC report and decision-making (accreditation; conditional accreditation; refusal of accreditation; appointment of re-accreditation);
- Post-accreditation monitoring.

### **Designing the Methodology for Study Programme Accreditation**

In 2019, the primary task of NAQA after the launch of its work and approval of the NAQA Board was to develop from scratch the external quality assurance methodology that would comply with ESG 2015. The draft was presented in March 2019 and opened for public discussion on the website of the Ministry of Education and Science of Ukraine. NAQA gathered remarks and suggestions during round tables and presentations on the new concept of external higher education quality assurance in Ukraine, involving representatives from HEIs, employers, student organizations, etc. The final draft was agreed upon in May 2019 at a joint meeting of NAQA and the Presidium of the Union of Higher Education Institutions Rectors of Ukraine. In July 2019, it was approved by the Ministry of Education and Science of Ukraine.

### **Methodology Implementation**

The methodology for study programme accreditation has become radically new for the Ukrainian higher education system since the traditional practice was the accreditation of specialties based on quantitative indicators. Realistic, evidence-based approaches to external quality assurance required significant efforts from HEIs to build internal quality assurance systems. The initial resistance within the higher education community was the key challenge for NAQA. Therefore, considerable attention was devoted to clearly and comprehensively communicating information about the accreditation process and external evaluation methodology to all stakeholders.

In autumn 2019, before NAQA started the accreditation procedure, it developed guidelines regarding the accreditation procedure for participants of the accreditation process. In particular, the Self-Evaluation Report form and the Guidelines on Completing the self-assessment report were developed for HEIs. The round tables for HEI's management were launched in most of the regions of Ukraine (approximately 20 regional round tables in September-November 2019). The accreditation methodology, procedures, criteria, and indicators for evaluating the study programmes were discussed during these events. NAQA continues the practice of holding regional and sectoral events for the HEIs. Due to the start of the COVID-19 epidemic and later the introduction of martial law, most events in 2020-2023 took place online.

For NAQA experts, the Methodological Guidelines for the Application of the Criteria for Evaluating the Quality of Study Programme (hereinafter the Methodological Guidelines) were developed. The Methodological Guidelines draw attention to the principles of the Criteria's application:

1. Respect for HEI autonomy
2. Taking into account the context of the HEI
3. Considering the opinions of stakeholders
4. Analyticity and evidence

Considering the feedback received from the accreditation process participants during the first year of implementation of the accreditation procedure in 2020, the Methodological Guidelines were revised and updated. In 2022, Recommendations for experts on the review and external evaluation of internal policies and procedures for ensuring academic integrity were developed. In 2024, NAQA released Clarification on the Application of Criteria for Evaluating Study Programmes, incorporating the invaluable feedback received from HEIs, accreditation experts, SECs, etc., and taking into account provisions provided by the updated Regulation on Accreditation.

### **Continuous Improvement**

In 2021, NAQA prepared the Self-Assessment Report to showcase its activities regarding the implementation of the ESG 2015. The report was developed following ENQA requirements, served to analyze NAQA procedures and processes critically, and developed an action plan for further improvement. Therefore, in 2022, in cooperation with the Verkhovna Rada Committee on Education, Science and Innovation, the Ministry

of Education and Science of Ukraine, representatives of students, employees, and other stakeholders, NAQA developed The National Action Plan on external higher education quality assurance in Ukraine for the 2022-2023 period.

Among the priority actions, the following were identified:

- updating the Regulations on accreditation and study programme evaluation criteria;
- development of the procedure for post-accreditation monitoring;
- reforming the procedures for appealing against NAQA decisions.

In 2023, NAQA initiated changes to Ukrainian legislation, which included adding post-accreditation monitoring to NAQA's powers and establishing the Appeals Chamber. In 2024, the new edition of the Regulations on Accreditation (ref. N 686 dated 15.05.2024) was adopted.

The new edition of the Regulations on Accreditation (ref. N 686 dated 15.05.2024) was adopted in 2024. The key changes are the following:

- The study programme evaluation criteria have been adjusted.
- The conditions of NAQA decisions for accreditation with the definition of exemplary accreditation and conditional accreditation have been clarified.
- The procedures for conducting post-accreditation monitoring and working with information with limited access during accreditation, accreditation of joint degree programmes have been regulated.
- The possibilities of simultaneous accreditation of several study programmes by specialties and fields have been expanded, and the stages of the accreditation procedure have been determined/
- Procedures for terminating and suspending accreditation have been introduced, along with a model for cancelling the decision on the appointment of an expert panel.

*Thus, NAQA has made significant efforts to enhance the effectiveness and objectivity of its accreditation methodology for study programmes, promptly addressing the shortcomings and needs identified by stakeholders. The accreditation process has been aligned with Ukrainian legislation in higher education through well-established cooperation with the national government. Analyzing the feedback from stakeholders enables systematic improvements to the accreditation methodology. It encourages HEIs to enhance their internal quality assurance practices and provides clear information about the results of external evaluations and necessary follow-up actions. A significant challenge for the NAQA is continuing its activities and implementing changes under martial law, as HEIs face systematic attacks and destruction due to Russian aggression. Therefore, the need to consider the level of workload and costs required from HEIs to implement quality assurance processes is particularly acute. An example of such consideration can be the introduction of post-accreditation monitoring. By the Law of Ukraine On Higher Education, NAQA carries out post-accreditation monitoring of study programmes accredited by it free of charge. Therefore, the procedure does not impose additional financial burdens on HEIs.*

#### **Legislative acts and Additional evidence:**

- Law of Ukraine on Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/1556-18#Text>
- Regulations on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>



- Licensing Conditions for Conducting Educational Activities (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/1187-2015-%D0%BF#Text>
- Self-Assessment Report (2021) <https://naqa.gov.ua/wp-content/uploads/2021/02/Self-Assessment-Report.pdf>
- The National Action Plan on external higher education quality assurance in Ukraine for the 2022-2023 period [https://en.naqa.gov.ua/wp-content/uploads/2022/06/National\\_Action\\_Plan\\_of\\_Ukrainian\\_external\\_higher\\_education\\_quality.pdf](https://en.naqa.gov.ua/wp-content/uploads/2022/06/National_Action_Plan_of_Ukrainian_external_higher_education_quality.pdf)
- The National Action Plan on Ukrainian external higher education quality assurance for 2024-2026 period <https://naqa.gov.ua/wp-content/uploads/2024/07/National-Action-Plan-2024-2026.pdf>

### **ESG standard 2.3: Implementing processes**

*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.

NAQA procedure for study programme accreditation includes the following steps: 1) preparation of a study programme self-evaluation report by the HEI; 2) an external assessment conducted by an expert panel; 3) a site visit; 4) preparation of the expert panel's report; 5) evaluation by the sectoral expert council; 6) a decision by NAQA; 7) post-accreditation monitoring.

### **SELF-ASSESSMENT REPORT**

The HEI is responsible for preparing the self-assessment report. The head of HEI appoints an academic staff member (the study programme guarantor) who prepares the self-assessment report and documents confirming the information provided. The self-assessment report is completed according to the form and uploaded to the NAQA IT System, along with the following documents: application for study programme accreditation, study programme profile and curriculum, and reviews from employers (if available).

After programme accreditation started in 2019, the main challenges for NAQA were the underdevelopment of internal higher education quality assurance systems in most HEIs in Ukraine, HEIs' unreadiness for critical self-assessment of their activities, and previous negative experience of a formalistic approach to external quality assurance. To ensure awareness of HEIs, NAQA has developed the Guidelines for Completing the Self-Assessment Report. To inform HEIs about study programme accreditation procedures and disseminate good practices, NAQA systematically organizes regional and sectoral seminars and webinars.

### **EXTERNAL EVALUATION**

Within five business days of the date of the accreditation application registration, the NAQA Head appoints the expert panel. NAQA Head's order schedules the timetable for the expert panel's work, including dates for the site visit to the respective HEI and the deadline for submission of the external evaluation report. An

expert panel consists of three experts, including one expert from among students. In the case of simultaneous accreditation of two or more study programmes within one speciality or interdisciplinary study programme, NAQA may expand an expert panel, but not by more than one expert for one study programme. If an organization of employers or professional association submits a request, a representative of employers may be included in the expert panel (by consent). The expert panel analyzes the self-assessment report, documents attached to it, and all other available materials and information regarding the study programme meant HEI's activities under such programme.

### **Site visit**

The expert panel conducts a three-day site visit to the HEI to verify facts stated in the self-assessment report, interview representatives of stakeholders regarding the study programme, and develop recommendations aimed at the quality of the HEI's educational activities. The expert panel carries out the site visit following the programme agreed upon by the head of the expert panel, the head of the HEI, and/or the guarantor of the study programme no later than three working days before it starts.

The COVID-19 pandemic in 2020-2021 and the declaration of martial law in 2022 due to Russian aggression led to the transition to an online format for most site visits.

NAQA is taking the following measures to ensure procedure adherence:

- Regulatory documents have been developed (Temporary procedure for conducting an accreditation examination using technical means of video communication (under the Order of the Ministry of Education and Science No. 406 dated 16.03.2020); Temporary procedure for study programme accreditation under martial law (2022))
- Weekly briefings for expert panels
- All meetings during an online site visit must be recorded (exclusively for the Secretariat's internal use to monitor compliance with the established procedure)

Today, NAQA focuses on expanding the practice of in-person site visits to HEIs in regions of Ukraine where it will not pose a threat to experts. According to the Regulations on Accreditation, site visits may be carried out in a remote or mixed format based on the NAQA decision in the case that the HEI is temporarily displaced, located in the territories where hostilities are (were) conducted, and/or suffered destruction as a result of hostilities, or taking into account the circumstances in conditions of martial law and the need to ensure security for all participants of the accreditation procedure. The accreditation of a study programme that leads to the award of a professional qualification in a regulated profession must be conducted only in a mixed format or on-site.

### **EXTERNAL EVALUATION REPORT**

The expert panel prepares the external evaluation report based on the results of the accreditation assessment and uploads it (in digital form) to the NAQA IT System. The HEI has the right to review the report and submit substantiated comments to NAQA within three working days of receiving it.

One of NAQA's key tasks is to maintain the proper quality of external evaluation reports. Since 2021, the NAQA Secretary has been checking draft reports for compliance with legislative requirements and NAQA recommendations. A training programme on report writing for experts has been established since 2023.

### **EVALUATION BY THE SECTORAL EXPERT COUNCIL**

On the day of submission of comments to the report or the day after the deadline for submission of such comments, NAQA Secretariat provides members of the relevant SEC access to the materials of the accreditation case. The SEC head appoints a speaker from among the members of the respective SEC who

studies and analyzes the external evaluation report, and all the materials received and prepares the SEC report. The SEC report contains recommendations for improving the study programme and HEI's educational activities, as well as substantiated proposals regarding the level of compliance for each criterion. After drafting the SEC report, the speaker submits it for internal discussion by the SEC. The decision on the accreditation case is made collectively by a majority vote of the SEC. HEI and expert panel members can respond to the SEC report draft and participate in the SEC meeting to argue their position.

The SEC adopts one of the following decisions:

- Approve the SEC report and forward the accreditation case for consideration at NAQA Board meeting;
- Submit a substantiated proposal for the re-evaluation.

The stage of the SEC evaluation unifies the approaches to the study programme's external evaluation. This prevents varying interpretations of the methodology and evaluation criteria, promotes transparency in the process, and ensures that representatives from employers and international experts are included in the review of each accreditation case.

### **DECISION-MAKING PROCESS**

In case of agreement with the proposal contained in the SEC report, NAQA adopts one of the following decisions: on accreditation of the study programme, on conditional accreditation, to refuse accreditation, to appoint re-evaluation. In case of disagreement with the proposal contained in SEC report, or if the accreditation examination was conducted in violation of the procedure established by the Regulations on Accreditation, or if there are grounds to believe that the expert panel in the report came to clearly unfounded conclusions, NAQA has the right to decide on the appointment of a re-evaluation.

### **CONSISTENT FOLLOW-UP**

In 2021, as a result of NAQA self-evaluation regarding the compliance with the ESG 2015, it was identified that the follow-up procedure for programme-level external quality assurance needed to be stronger. First of all, Ukrainian legislation only provided follow-up for study programmes that received conditional accreditation.

Conditional accreditation is granted for one year to study programmes that, based on the external evaluation results, have been determined to comply with one or two criteria partially. This means that the study programme and the HEI's educational activities do not meet the defined criteria, but HEI can eliminate the identified shortcomings within one year. The following external evaluation considers the actions done by the HEI to correct the shortcomings of the study programme and achieve full compliance with the identified criteria. In particular, the analysis of the previous accreditation results and the measures taken by the HEI is highlighted in Sub-Criterion 8.6, according to which the results of external higher education quality assurance are considered during the study programme review.

Therefore, NAQA's primary focus has become creating a systematic approach to track the actions of HEIs following accreditation decisions. The National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 highlighted the importance of developing and regulating the procedure for post-accreditation monitoring as a top priority. In 2023, in cooperation with the Ministry of Education and Science of Ukraine and the Committee on Education, Science and Innovation of the Verkhovna Rada (Parliament) of Ukraine, the changes in Ukrainian legislation were implemented, and post-accreditation monitoring was included in the list of powers of NAQA. In 2024, the new edition of the Regulations on Accreditation introduced the procedure for post-accreditation monitoring.

Post-accreditation monitoring implies assessing the implementation of the recommendations provided due to accreditation. NAQA carries it out during the third year after the study programme obtains accreditation.



Post-accreditation monitoring includes pre-expert evaluation of materials (verification of data by the Secretariat), review by the SEC, and consideration by NAQA Board.

To carry out post-accreditation, the HEI submits to NAQA information about the changes that the study programme underwent after the preliminary accreditation, information on the response to recommendations and deficiencies identified during the accreditation of the relevant study programme, and other documents or links to online resources confirming the information provided.

Based on the results of the post-accreditation monitoring, NAQA establishes the fact of implementation of the recommendations provided as a result of the accreditation and/or compliance with the Criteria and makes the following decisions regarding the post-accreditation monitoring:

- on the successful completion of post-accreditation monitoring;
- on the need for compliance with the established criteria and setting a deadline to eliminate identified deficiencies.

The full-scale implementation of post-accreditation monitoring is a crucial priority in the National Action Plan on Ukrainian external higher education quality assurance for 2024-2026. In February 2024, eight Ukrainian HEIs voluntarily took part in piloting the post-accreditation monitoring process. This pilot programme expanded to include 30 HEIs in autumn 2024. Beginning in September 2024, post-accreditation monitoring will be mandatory for all study programmes undergoing external evaluation.

*The procedure for external evaluation of study programmes developed by NAQA is clearly outlined and communicated to all participants in the accreditation process. The procedure includes the study programme self-assessment report development, assessment by the expert group of the materials of the accreditation case, the site visit to the HEI, consideration of the accreditation case at the SEC meeting, decision-making by NAQA Board, and follow-up. NAQA managed to quickly respond to the pandemic and martial law challenges and develop practical tools for organizing visits remotely, maintaining the appropriate level of all defined procedures. NAQA also managed to eliminate legislative obstacles to the organization of an effective follow-up and develop a procedure for post-accreditation monitoring. NAQA's priority is to fully implement post-accreditation monitoring in the study programme external evaluation.*

#### **Legislative acts and Additional evidence:**

- Guidelines for Completing the Self-Assessment Report
- Temporary procedure for conducting an accreditation examination using technical means of video communication
- Temporary procedure for study programme accreditation under martial law (2022)
- National Action Plan on Ukrainian external higher education quality assurance for 2022-2023  
<https://en.naqa.gov.ua/wp-content/uploads/2024/08/%D0%B1%D0%B0%D0%BD%D0%B5%D1%80-UQAF-2024.png>
- National Action Plan on Ukrainian external higher education quality assurance for 2024-2026  
<https://naqa.gov.ua/wp-content/uploads/2024/07/National-Action-Plan-2024-2026.pdf>

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

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

The role of experts in the accreditation process is critically important to ensuring the quality and relevance of study programmes. NAQA expert is an individual engaged in accreditation reviews, possessing the necessary knowledge and skills, particularly in the field of higher education quality assurance. These competencies enable them to effectively evaluate the quality of study programmes and the educational activities of HEIs based on these programmes and to develop recommendations for improving the quality of higher education<sup>1</sup>.

The procedures for selecting individuals for inclusion in the Register of NAQA Experts, maintaining the Register, forming expert groups, and evaluating the quality of expert performance are outlined in the 'Regulation on the Expert and Expert Group of the National Agency for Higher Education Quality Assurance'<sup>2</sup>.

#### *Composition of expert panel. Role of student representative*

The expert panel tasked with conducting the accreditation evaluation of a study programme is composed of a team chair and two experts, including at least one expert who is a student, unless otherwise stipulated by the Regulations on Accreditation.

The formation of the expert panel adheres to the following principles, ensuring a fair and rigorous evaluation process:

1. Each expert is selected from the Register, based on their specialization in the field relevant to the programme being accredited. Where exact alignment is not possible, experts from adjacent specialties are chosen.
2. The inclusion of a student expert, who is actively pursuing higher education at a level equal to or above the study programme being evaluated.
3. For the accreditation of PhD programmes, at least one expert in the panel must hold a Doctor of Science degree. This requirement guarantees that the evaluation is led by individuals with advanced academic and research expertise, fitting the rigor of doctoral-level programmes.

Experts with any actual or potential conflict of interest are excluded from participating in the expert panel. This is rigorously monitored by the Secretariat.

Through this carefully structured approach, NAQA ensures that its expert panels are composed of individuals who bring a diverse, balanced, and unbiased perspective, essential for a thorough and credible accreditation evaluation.

Within the expert panel, all members hold equal rights, fostering a balanced and collaborative decision-making process. However, the chair of the expert panel has additional responsibilities including organizing the overall workflow of the expert panel, coordinating with the HEI to agree on the visit programme and the list of documents to be requested, and ensuring the timely submission of both the draft report and the final report to the information system.

The student expert collaborates on an equal basis with the other panel members. There are no 'student-specific' or 'non-student' issues; all matters are relevant to the entire expert panel. As experience has shown, student experts provide a unique understanding of students needs, contribute to moderating meetings with student representatives, and help facilitate the exchange of best practices across HEIs. Their involvement fosters the development of engaged, responsible, and proactive citizens.

While the inclusion of student experts has been successful, several challenges have been identified, including insufficient knowledge, difficulties with critical analysis, and issues with self-organization. To address these challenges, NAQA has implemented several improvements:

- NAQA has upgraded its training programmes to provide more comprehensive education and resources for student experts;
- the selection process for student experts now emphasizes their motivation and commitment, ensuring that only highly engaged and dedicated students are included in the expert panels;
- addressing feedback more experienced experts are included in the panels to offer mentoring and guidance for student experts;
- additional educational support is provided through targeted training sessions to further develop student experts' skills;
- regular monitoring and feedback mechanisms help to track the performance of student experts and provide continuous support and ensure prompt resolution of any issues.

By implementing these strategies, NAQA ensures that the involvement of student experts remains a valuable and effective part of the accreditation process, maintaining the robustness and inclusivity of the evaluation.

The expert group is formed without involving a student at the request of the HEI in cases where the accreditation of a study programme is conducted at a higher military educational institution or a HEI with specific learning conditions, if the accreditation procedure requires access to restricted information.

#### *Overview of the Registry*

Experts are listed in the official NAQA Register, and their role is considered active during their involvement in a specific accreditation evaluation.

NAQA announced the first Call for experts in June 2019. As of September 2024, the NAQA Expert Registry includes 5027 individuals, including 4,054 academic staff, 973 students. We received about 12,000 applications from candidates in total. Annex E. Table 4 shows the number of experts according to the subject area.

Announcements for recruiting academic staff experts are published for each specialty as needed, while the recruitment of student experts is ongoing.

The structured approach to forming and managing expert panels at NAQA ensures a rigorous, fair, and balanced accreditation process. By incorporating a diverse range of experts, including student representatives, NAQA enhances the credibility and effectiveness of its evaluations.

#### **Selection of peer-review experts**

The selection process for NAQA experts is designed to ensure that only highly qualified individuals are chosen to participate in the accreditation process. The stages are as follows:

1. Call for experts. NAQA publishes a call for experts on its official website, specifying clear criteria for selection, including academic qualifications, professional experience, and relevant certifications.
2. Application Submission. (online application; motivation letter, CV, proofs of qualification, document verifying the candidate's place(s) of employment or study)
3. Documents review. The Secretariat thoroughly reviews all submitted documents to verify qualifications and eligibility. Candidates are shortlisted based on their experience, qualifications, and alignment with NAQA's criteria.

4. Online Course. Shortlisted candidates must complete an online course covering the accreditation process and the application of ESG 2015 standards. Candidates are tested at the end of the course, and a minimum score of 60 points is required to proceed.
5. Training. Candidates who pass the online course and test are invited to participate in a training session where they are evaluated on: quality of task completion, teamwork; legislation knowledge; proficiency in external evaluation methods; fluency in Ukrainian; adherence to ethical behaviour standards.
6. Evaluation. Candidates are assessed based on their training performance using a uniform scale (1-10). To be included in the Expert Register, candidates must achieve a minimum score of 5. This competency-based evaluation framework includes qualities such as knowledge, skills, and personal attributes necessary for effective performance.
7. Inclusion of a candidate in the Register is determined by NAQA Board members' decision.

Multifactor selection, the uniform scale for evaluating training performance and the final decision by NAQA Board members reflect a structured and fair approach to selecting experts.

### **Competency-Based training programmes**

In September 2019, NAQA selected and trained 38 trainers to build internal capacity. Leading experts from the British QAA, Rishma Dattani and Ian Welch, were invited to conduct this intensive and practical four-day training. The first three days focused on studying the QAA's approach, simulating accreditation procedures, and analyzing case studies. The fourth day was dedicated to developing a tailored 2-day training programme for NAQA experts.

The first initial expert training session was held on September 25, 2019, in Kyiv. Candidates were required to complete an online course, review the "Recommendations for the Application of the Criteria for Assessing the Quality of Study Programmes," pass a test, and analyze a hypothetical self-evaluation document. This preparation ensured participants were well-versed in the new accreditation paradigm, aligned with European standards. The course emphasized procedural clarity and the roles of experts, SEC, NAQA, and HEIs.

The comprehensive 2-day in-person training covered key areas essential to expert roles: understanding the characteristics of the new accreditation paradigm; ethics for experts; effective visit planning; mastering questioning techniques; simulations of accreditation meetings; case study discussions; formulating well-reasoned conclusions in the report.

In February 2020, based on insights from the initial accreditation cycle in 2019 and feedback from stakeholders, including experts, HEIs, NAQA Board members, and NAQA Secretariat, organized a review meeting for trainers. The objective was to refine the training programme and address challenges from real-life cases. Despite the disruptions caused by COVID-19, NAQA resumed training in July 2020, incorporating new lessons from remote site visits. This phase emphasized the importance of critical thinking, transparency in grading, and report writing skills. Participants were required to complete an online course on report writing as a prerequisite.

Since then, NAQA has continuously updated the training content to address emerging needs. In 2021, NAQA introduced a collaborative online document form to enhance teamwork among experts during the accreditation process. The two-day training programme was updated to include guidance on using this tool effectively.

In May 2022, NAQA launched a video lecture series, consisting of 14 lectures, to make the theoretical aspects of accreditation more accessible. This allowed for asynchronous learning. The test was revised accordingly, and a new one-day training was developed to enhance practical skills. This training focused on critical

thinking, evidence-based decision-making, and meeting the reporting standards expected of expert panels. (See Annex F).

In October 2024, the content of the training programmes was updated to reflect changes to the Regulations, the new report format.

The iterative updates to the training programmes, based on stakeholder feedback, monitoring and changes in legislation demonstrate NAQA’s responsive and evolving approach. We consider this is crucial for maintaining the quality and relevance of training.

### Sectoral members

As of September 2024, NAQA operates 31 SECs, composed of 354 sectoral members. Each SEC includes between 9 and 15 members, ensuring diverse representation from various stakeholders in HE, including academic staff, an employer representative, international expert, and student. Specifically, each SEC must have at least one academic representative for each specialty within the field of knowledge it oversees, with a limit of one representative from any given university in a single Council.

SEC members are appointed based on the results of a competitive selection process. The procedures for nominating and electing members of SECs are governed by the ‘Procedure for Nominating Candidates and Electing Members of Sectoral Expert Councils’<sup>3</sup>. The organizational procedures for SECs operations, case reviews, and expert conclusion preparation are detailed in the ‘Regulation on Sectoral Expert Councils of the National Agency for Higher Education Quality Assurance’<sup>4</sup>.

Table 5. Sectoral Expert Council composition

Category	Academic Staff	Employers	Students	International Experts
<b>Requirements</b>	<ul style="list-style-type: none"> <li>- scientific or scientific-teaching staff representative</li> <li>- a scientific degree in the relevant field of knowledge or work experience in the relevant field for at least 5 years</li> <li>- experience in the study programme design and implementation</li> <li>- experience in higher education quality assurance</li> </ul>	<ul style="list-style-type: none"> <li>- representative of employers, their organizations and associations, professional associations</li> <li>- a scientific degree in the relevant field of knowledge or work experience in the relevant field for at least 5 years</li> </ul>	<ul style="list-style-type: none"> <li>- being in the status of a higher education student at the time of submission of documents for participation in the competition</li> </ul>	<ul style="list-style-type: none"> <li>- a scientific degree in a relevant field of knowledge or work experience in the relevant field for at least 5 years</li> <li>- an obtained degree or work experience in a foreign HEI</li> <li>- experience higher education quality assurance abroad</li> <li>- study at a foreign HEI (for candidates from among students)</li> </ul>
<b>Nomination</b>	self-nomination	nominated by an employer organization, an association of employer organizations, or	HEI student self-nomination by the Ukrainian Association of	self-nomination

		a professional association	Students and Young Scientists	
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The competitive selection process for SEC members includes next stages:

1. Announcement of the competition by NAQA decision;
2. Submission of documents by nominated candidates;
3. Verification of the submitted documents by NAQA Secretariat;
4. Evaluation of candidates by the Competition Commission according to criteria outlined in Annex 2 of the Procedure;
5. Approval of the evaluation results by the Competition Commission;
6. NAQA Board Decision to approve (or amend) the composition of the SECs.

After the formation of the SEC, members undergo targeted training. This contrasts with the process for general experts, who receive training before being considered for inclusion in the expert registry. This difference in approach reflects the distinct roles these groups play in the accreditation process: SEC members verify the expert group's report, requiring a higher level of professional experience and sector-specific knowledge.

By selecting SEC members based on prior qualifications and experience, NAQA can identify top candidates early, optimizing the allocation of resources by tailoring training to their existing expertise. However, this approach has its limitations. Candidates may be selected based on their experience but lack familiarity with the specific requirements of working within the SEC. Post-selection training might not always fully address these gaps, and without prior testing or training, it is harder to predict how candidates will perform in real-world tasks.

To mitigate these risks, NAQA has implemented several strategies:

- At the initial stages of their work, new SEC members receive mentorship from more experienced colleagues, helping them grasp specific requirements and offering practical guidance.
- Regular training sessions and seminars are held for existing SEC members to ensure ongoing professional development and adaptation to new standards.
- A feedback system is in place for new SEC members, enabling the identification of challenges they encounter and informing necessary adjustments to both the training programmes and the selection process.
- Real or simulated case studies are incorporated into training sessions, allowing candidates to gain hands-on experience with the types of tasks they will be performing in the SEC.

The training for SEC members is designed to equip them with key competencies necessary for their role in the accreditation process. It focuses on how their work is organised, developing critical thinking, enhancing argumentation skills, and the ability to provide well-grounded recommendations, as well as producing high-quality written content.

### **Professional Development of NAQA Experts**

NAQA is committed to the continuous professional development of its experts and trainers, ensuring their qualifications remain aligned with international standards in HE quality assurance.

#### *Workshops and Training Programmes*



Between July and September 2020, NAQA held a series of workshops focused on key areas, such as academic integrity, evaluation methodologies, and self-assessment of study programmes. These sessions, featuring both national and international experts, significantly improved evaluators' knowledge of global best practices.

In December 2020, NAQA trainers attended a refresher course led by Ian Welch and Alison Felse from the UK's QAA. This course emphasized leadership and management skills during accreditation, focusing on evidence-based decision-making. It also included a segment on NAQA's distinct approach to quality assurance.

To address challenges in the experts' training programme, NAQA organized a one-day session in November 2021.

#### *Targeted Training for Panel Chairs*

In March 2021, NAQA introduced a specialized training programme for panel chairs, which was revised in May 2023. This programme focuses on leadership, ethical standards, communication, and psychological resilience. The one-day online session equips chairs with the skills to lead panels, handle conflicts, and manage stress while fostering a positive working environment.

#### *Report Writing Training*

In August 2023, NAQA launched a two-day online training on report writing to strengthen critical thinking and practical skills. This programme is centered on evidence-based conclusions, effective questioning, and clear report writing. Participants learned how to provide constructive feedback, make feasible recommendations, and ensure clarity and conciseness in their reports.

#### *Expert Performance Evaluation Training*

In January 2024, NAQA introduced a one-day performance evaluation training aimed at underperforming experts. This session focused on critical mistake analysis, ethical standards, and strategies for improvement through case studies. Experts were encouraged to engage in self-reflection and continuous development.

#### *Updated Training Programmes*

In autumn 2024, all training programmes were updated to reflect legislative changes, including revised instructional materials and recommendations.

Through these initiatives, NAQA has significantly strengthened the capacity of its experts, ensuring they are equipped to lead accreditation processes, make evidence-based evaluations, and produce high-quality reports. This ongoing commitment contributes to the overall enhancement of higher education quality in Ukraine.

#### *Additional Avenues for Expert Development*

NAQA offers various supplementary programmes to further support the professional growth of experts and HEIs.

#### *Online Courses*

NAQA developed an online course titled "*How to Write a Quality Report*," which covers the role of the accreditation expertise report, outlining the structure and content requirements for each component. This course aims to ensure clarity and precision in report writing among experts.

Another course, "*Enhancing Teaching and Organizational Management in Universities*" focuses on improving teaching quality, updating study programmes, and leadership in university management. This course is a

collaborative effort between NAQA, Ukrainian educators, and the Saxon Center for Teaching and Learning in Higher Education (HDS) in Germany, providing diverse perspectives on higher education management.

#### *Workshops and Webinars for experts*

Building on insights gained from accreditation evaluations and feedback from experts and HEIs, NAQA organizes regional workshops and webinars. These events are tailored for experts and provide a comprehensive platform to address practical cases and tools for quality evaluations.

In addition, thematic webinars are offered to both experts and HEI representatives. Topics include *Academic Integrity, The Role of Students in Quality Assurance, PhD Programme Accreditation, and Quality Assurance in Online and Specialized Fields* (e.g., Art, Teacher Education, Military Education). NAQA also holds workshops and webinars on internal quality assurance at the request of HEIs, with experts actively participating as institutional representatives.

#### *Sectoral Expert Council Webinars*

NAQA's SECs contribute to the quality assurance system through annual reporting webinars. These public events summarize the councils' yearly work, address evaluation challenges, share best practices, and highlight common errors in programme design. Such webinars provide transparency and help experts understand the council's positions on key issues.

#### *UAS QA POOL*

Together with Ukrainian Association of Students (UAS) NAQA developed and established training programme "UAS QA POOL" for students who are interested in QA topic and who potentially would like to become NAQA expert. UAS QA POOL is a three-days training held by NAQA Board and NAQA Secretariat representatives. Since the beginning of 2024, 3 trainings were done in different Ukrainian HEIs.

#### *Support and consultations*

An essential element of experts' professional development is their ability to access timely support and consultations. NAQA facilitates this through a social media group where experts can ask questions at any time and receive responses from fellow experts, secretariat employees, or NAQA members. This has generally been effective, particularly in ensuring real-time support for technical and procedural queries. However, we continue to monitor and optimize the platform to ensure that more complex queries receive the depth of response they require and that discussions remain productive.

#### *Briefing before the visit*

Before each visit to a higher education institution, all experts attend a detailed briefing where they can ask questions about the specific accreditation case. This practice is extremely useful as it helps experts prepare by introducing them to legislative updates and procedural matters. Additionally, the briefings provide feedback on what needs updating in the training materials and offer new cases for training sessions and practical workshops.

#### *Methodological recommendations & Instructions*

In response to evolving challenges and expert feedback, our team continuously updates methodological recommendations and develops detailed instructions. The first set of methodological recommendations was developed in 2019. However, within a year, it became evident that they needed to be updated and expanded to address numerous questions from higher education institutions and experts. In 2024, due to changes in legislation, terminology, and the introduction of the "List of Major Drawbacks," the methodological recommendations were revised to better align with new requirements and the challenges faced by the quality assurance system in education. In addition to updating these recommendations on quality



assessment criteria, our team also develops detailed instructions that cover aspects such as organizing expert work, technical considerations for conducting remote evaluations, and the use of IT systems.

### *Peer learning*

Peer learning is a vital component of expert training, fostering continuous professional development. Peer learning occurs both during formal training sessions and throughout the evaluation process. When forming an expert group, Secretariat carefully considers each expert's strengths and areas for development, ensuring a balance that promotes collaboration. This approach has proven effective, as experts can share their knowledge, assisting one another in addressing weaknesses and reinforcing their respective areas for improvement. However, we are exploring the potential for more structured peer mentorship programmes, particularly for newer experts, to accelerate their development and ensure consistent high performance across all evaluations.

### **Training of Student Representatives**

Student representatives are trained alongside academic staff, ensuring they acquire the necessary skills to participate in external quality assurance processes.

Over recent years we have observed a concerning trend: a gradual decline in student engagement in these activities (refer to Table 5).

Table 5. Student engagement in external quality assurance

Year	The number of applications from students	The number of students selected for further training
2019	987	889
2020	1031	915
2021	474	518
2022	164	136
2023	999	914

In 2023, the number of applications significantly increased, reflecting the targeted outreach efforts of NAQA, its experts, and higher education institutions in involving students in external quality assurance procedures. However, we observe significant disparities in student involvement across institutions. Some universities actively promote student representation, while others show much lower levels of engagement. The willingness of students to engage in external quality assurance processes is closely linked to the development of a strong quality culture within HEIs. This highlights the dual responsibility of both HEIs and NAQA: to foster this culture and to clearly communicate the value of student participation.

In response to this challenge, NAQA took decisive action by collaborating with UAS in March 2024 to develop the UAS QA POOL training programme. This initiative is designed not only to provide potential student experts with the necessary knowledge and skills in quality assurance but also to highlight the vital role they play within these processes. Through this programme, we aim to address the gaps in understanding and motivation that may be contributing to the decline in student participation.

As of now, three UAS QA POOL training sessions have been held (Ternopil: April 2024; Poltava: May 2024; Kyiv (in the relocated university) October 2024), and the results have been encouraging. Nearly all participants expressed a strong interest in continuing their journey as expert candidates, and they have since

been added to the official register of potential experts. This indicates that when given the right support and training, students are eager to contribute meaningfully to quality assurance efforts.

While these initial efforts show promise, it is evident that NAQA must continue to explore and implement strategies that will not only reverse the current trend but also ensure sustained and widespread student involvement in quality assurance processes.

### **Ensuring Independence and No Conflict of Interest**

To ensure the independence and objectivity of the experts involved in accreditation and evaluation processes, NAQA has implemented a mechanism of no-conflict-of-interest:

- Excluding experts who are affiliated with the institution being assessed from the expert panel. This includes experts who work (either on a full-time basis, part-time, or under academic mobility programmes) or have worked in the last five years at the HEI, as well as those who study or have studied there, or whose close relatives have studied there within the last five years;
- All experts are required to declare any potential conflicts of interest before accepting an evaluation role. This includes any professional, personal, or institutional affiliations that could influence their judgment;
- Providing comprehensive guidelines and examples on conflicts of interest within the 'Regulation on Expert and Expert Panel,' which include practical examples to assist experts and institutions in identifying both direct and indirect conflicts of interest. These guidelines cover situations involving familial, financial, professional, or personal relationships;
- Avoiding the repeated assignments of the same experts to the same institutions;
- Forming expert groups with diverse backgrounds and regions;
- During expert trainings NAQA places significant emphasis on objectivity, impartiality, and professional ethics. Real-life scenarios and simulations are used to demonstrate potential biases, while experts are taught strategies for avoiding subjective judgments.
- To ensure transparency, the order regarding the composition of the expert panel is made publicly available, allowing institutions and the public to verify the independence of the process;
- Establishing a Commission on Evaluation of Expert Proficiency responsible for monitoring processes that ensure the objectivity and impartiality of the expert group throughout the evaluation;
- Allowing institutions to provide feedback on the impartiality and professionalism of experts post-evaluation, which is used to assess potential conflicts of interest;
- If a conflict of interest that was not disclosed during the evaluation process is discovered, NAQA requires a re-evaluation to be conducted;
- Requiring experts to periodically review their own performance and decisions, reflecting on potential biases or conflicts that might have influenced their work;
- Institutions have the right to request the replacement of an expert if a conflict of interest is identified. Such requests must be substantiated with evidence of the conflict.

These measures collectively ensure that NAQA maintains a transparent, impartial, and objective quality assurance process. Through continuous training, oversight, and feedback mechanisms, NAQA strives to safeguard the integrity of its evaluations and the credibility of the accreditation system.

## Involving international experts

NAQA ensures the inclusion of international experts in expert panel under specific conditions:

1. An international expert is included in the expert group when accrediting a joint study programme agreed upon between a Ukrainian higher education institution (HEI) and a foreign one.
2. For any other study programme, the involvement of an international expert can occur either at the initiative or with the consent of the HEI.

When an international expert is engaged, the HEI is responsible for:

- Ensuring all documents submitted for accreditation are translated into English.
- Conducting the expert visit in English, either in person at the HEI or via videoconferencing tools. If necessary, the HEI must provide either consecutive or simultaneous interpretation into English.

Additionally, it is important to note that individuals who are citizens of a state recognized by the Verkhovna Rada (Parliament) of Ukraine as an aggressor or occupying state are prohibited from serving as international experts.

As of September 2024, NAQA has successfully involved 113 international peer-review experts, including 99 academic staff and 14 students, and 25 SEC members. While this involvement has enriched the accreditation process, it has not been without challenges. One major hurdle has been the language barrier, as all stages of accreditation are conducted in Ukrainian. Finding international experts proficient in Ukrainian has limited the pool of potential candidates. To address this, NAQA has shifted its focus toward experts with significant international experience, particularly those who have studied, worked, or completed internships abroad, ensuring that they bring a global perspective to our evaluations while meeting linguistic requirements.

Despite these challenges, the inclusion of international experts has significantly enhanced the accreditation process by aligning Ukrainian study programmes with global standards. Their fresh perspectives and methodologies from other countries allow for a broader, comparative analysis of our programmes. This has not only strengthened the rigor of our processes but has also resulted in targeted recommendations that have contributed to the continuous improvement and modernization of Ukrainian education.

NAQA has also invested in training international experts. In December 2021 and January-February 2022, in collaboration with British Council in Ukraine training sessions for experts led by QAA trainers (Ian Welch & Alison Felsh) were organized. These sessions included a comparative analysis of quality assurance approaches used by European agencies. Although the experts involved did not yet hold official international status, the training allowed us to assess their potential for engaging in accreditation processes abroad and in Ukraine. This initial assessment demonstrated that experts with international experience were well-prepared to contribute to quality assurance, both in Ukraine and in collaboration with foreign agencies.

In March 2024, NAQA launched the development of a specialized training programme for international experts. This initiative, which took six months to prepare, reflects our commitment to integrating international expertise into our quality assurance activities. Trainers from the Advisory Board, along with NAQA representatives, played a key role in guiding participants through the nuances of international best practices. As a result, the participants gained practical insights into how to integrate their international experience into Ukraine's QA processes, conduct comparisons and offer recommendations based on best international practices, and identify areas for improvement that local reviewers might overlook.

Looking forward, NAQA plans to further expand this initiative by refining the training programme based on participant feedback and evolving needs. This continuous development ensures that the involvement of international experts remains a dynamic and valuable component of NAQA's quality assurance efforts.

## Involving employer's representatives

According to NAQA procedures, an employer representative can be included in the expert panel based on a formal request from an employer, employers' organization, or professional association. This request must be submitted at least 10 working days before the scheduled expert visit, and the representative's inclusion is subject to their consent. However, as of September 2024, there have been no cases where an employer has been included in the expert panel.

The participation of employer representatives in the SEC is mandatory.

Including of employer representatives has proven highly beneficial. They provide insights into industry trends and skills requirements, ensuring study programmes are relevant and up-to-date. Their feedback helps refine and adapt curricula to better prepare students for real-world applications.

### Performance Monitoring and Review is described in section ESG 3.6.

In conclusion, NAQA has made considerable progress in aligning its practices with the requirements of ESG 2.4, particularly in the careful selection, training, and support of experts, including students. Our systematic approach to ensuring the involvement of a wide range of expertise, such as academics, students, and industry professionals, guarantees that accreditation decisions reflect multiple perspectives, strengthening the credibility of the process. The performance monitoring practices we have implemented enable us to continuously evaluate and enhance the quality of our experts' work. We have instituted mechanisms to prevent conflicts of interest, ensuring the independence and impartiality of expert accountability.

However, NAQA recognizes that continuous improvement is essential. Despite the successes achieved thus far, areas for further development have been identified. Moving forward, NAQA will focus on enhancing training programmes, expanding the involvement of international experts, and refining performance monitoring practices. We will address the discrepancies between expert training and report quality, while also developing new methodologies to evaluate the work of sectoral expert councils. By implementing these improvements, we aim to strengthen expert performance, foster transparency, and ensure that the overall accreditation process continues to meet the highest standards of quality assurance.

### Legislative acts and Additional evidence:

1. Regulations on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>
2. Regulation on the Expert and Expert Group of the National Agency for Higher Education Quality Assurance (in Ukrainian) <https://naqa.gov.ua/wp-content/uploads/2024/09/%D0%9F%D0%BE%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%BD%D1%8F-%D0%BF%D1%80%D0%BE-%D0%B5%D0%BA%D1%81%D0%BF%D0%B5%D1%80%D1%82%D0%B0-%D1%82%D0%B0-%D0%B5%D0%BA%D1%81%D0%BF%D0%B5%D1%80%D1%82%D0%BD%D1%83-%D0%B3%D1%80%D1%83%D0%BF%D1%83-%D0%9D%D0%B0%D1%86%D1%96%D0%BE%D0%BD%D0%B0%D0%BB%D1%8C%D0%BD%D0%BE%D0%B3%D0%BE-%D0%B0%D0%B3%D0%B5%D0%BD%D1%82%D1%81%D1%82%D0%B2%D0%B0-%D1%96%D0%B7-%D0%B7%D0%B0%D0%B1%D0%B5%D0%B7%D0%BF%D0%B5%D1%87%D0%B5%D0%BD%D0%BD%D1%8F-%D1%8F%D0%BA%D0%BE%D1%81%D1%82%D1%96-%D0%B2%D0%B8%D1%89%D0%BE%D1%97-%D0%BE%D1%81%D0%B2%D1%96%D1%82%D0%B8.pdf>

3. Procedure for Nominating Candidates and Electing Members of Sectoral Expert Councils  
[https://naqa.gov.ua/wp-content/uploads/2024/02/%D0%9F%D0%BE%D1%80%D1%8F%D0%B4%D0%BE%D0%BA-%D0%B2%D0%B8%D1%81%D1%83%D0%BD%D0%B5%D0%BD%D0%BD%D1%8F-%D0%BA%D0%B0%D0%BD%D0%B4%D0%B8%D0%B4%D0%B0%D1%82%D1%83%D1%80-%D1%96-%D0%BE%D0%B1%D1%80%D0%B0%D0%BD%D0%BD%D1%8F-%D1%87%D0%BB%D0%B5%D0%BD%D1%96%D0%B2-%D0%93%D0%95%D0%A0\\_27.02.2024.pdf](https://naqa.gov.ua/wp-content/uploads/2024/02/%D0%9F%D0%BE%D1%80%D1%8F%D0%B4%D0%BE%D0%BA-%D0%B2%D0%B8%D1%81%D1%83%D0%BD%D0%B5%D0%BD%D0%BD%D1%8F-%D0%BA%D0%B0%D0%BD%D0%B4%D0%B8%D0%B4%D0%B0%D1%82%D1%83%D1%80-%D1%96-%D0%BE%D0%B1%D1%80%D0%B0%D0%BD%D0%BD%D1%8F-%D1%87%D0%BB%D0%B5%D0%BD%D1%96%D0%B2-%D0%93%D0%95%D0%A0_27.02.2024.pdf)
4. Regulation on Sectoral Expert Councils of the National Agency for Higher Education Quality Assurance  
[https://naqa.gov.ua/wp-content/uploads/2024/08/%D0%9F%D0%BE%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%BD%D1%8F-%D0%BF%D1%80%D0%BE-%D0%93%D0%95%D0%A0\\_%D0%B7%D0%BC%D1%96%D0%BD%D0%B8-%D0%B2%D1%96%D0%B4-27.08.2024%E2%84%9615.pdf](https://naqa.gov.ua/wp-content/uploads/2024/08/%D0%9F%D0%BE%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%BD%D1%8F-%D0%BF%D1%80%D0%BE-%D0%93%D0%95%D0%A0_%D0%B7%D0%BC%D1%96%D0%BD%D0%B8-%D0%B2%D1%96%D0%B4-27.08.2024%E2%84%9615.pdf)
5. Procedure for the Quality Assurance of Expert Performance by the Commission of the National Agency for Higher Education Quality Assurance (in Ukrainian)  
<https://naqa.gov.ua/wp-content/uploads/2024/04/%D0%9F%D0%BE%D1%80%D1%8F%D0%B4%D0%BE%D0%BA-%D1%80%D0%BE%D0%B1%D0%BE%D1%82%D0%B8-%D0%9A%D0%BE%D0%BC%D1%96%D1%81%D1%96%D1%97-%D1%89%D0%BE%D0%B4%D0%BE-%D0%B7%D0%B0%D0%B1%D0%B5%D0%B7%D0%BF%D0%B5%D1%87%D0%B5%D0%BD%D0%BD%D1%8F-%D1%8F%D0%BA%D0%BE%D1%81%D1%82%D1%96-%D1%80%D0%BE%D0%B1%D0%BE%D1%82%D0%B8-%D0%B5%D0%BA%D1%81%D0%BF%D0%B5%D1%80%D1%82%D1%96%D0%B2-02.04.2024.pdf>

### ESG Standard 2.5 Criteria for Outcomes

*Any outcomes or judgments 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.*

The study programme external evaluation is performed according to explicit criteria published in the Annex to the Regulations on Accreditation approved by the Ministry of Education and Science of Ukraine (No. 686 dated 15.05.2024).

The panel of experts evaluates the degree to which the study programme adheres to the established criteria, considering the information provided in the self-assessment report, the attached documents, and the findings from the on-site visit to the HEI. The evaluation of the study programme and HEI educational activities are carried out according to each criterion and evaluation scale, which covers four levels of compliance:

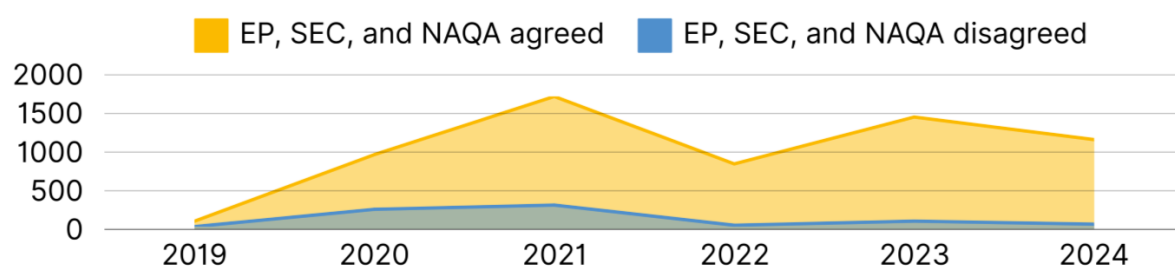
- A – full compliance with the defined criterion, innovative and good practices are identified;
- B – full compliance with the defined criterion, minor drawbacks are identified;
- E – partial compliance with the defined criterion, significant drawbacks are identified (can be eliminated in one year);
- F – non-compliance with the defined criterion, fundamental drawbacks are identified.

The Guidelines on the criteria application for study programme accreditation (2019, 2020, 2024) specify the approaches for external evaluation. In addition, NAQA developed Recommendations for NAQA experts on accreditation of study programmes of the third level of higher education (2020) and Recommendations for experts on the evaluation of internal policies and procedures for ensuring academic integrity and external assessment of their quality (2022).

Aware of the need to communicate the defined criteria requirements, the NAQA conducts seminars and webinars for all participants in the accreditation process. An online course for experts outlining the criteria application is freely available. Additional training programmes have been developed and implemented for current experts.

NAQA established an additional stage for analyzing external evaluation reports at the SEC meeting to maintain consistency in interpreting criteria for a substantial number of cases annually. SEC evaluates the reasoning in the report, the accuracy of the approach to evaluating identified practices, and the quality of the recommendations offered. Following a review of the external evaluation report, the SEC may either support the expert panel's determination of compliance levels with the criteria or recommend changes to the assessed levels.

### A total of NAQA decisions



	EXEMPLARY ACCREDITATION		ACCREDITATION		CONDITIONAL ACCREDITATION	
	decisions	EP, SEC & NAQA consent	decisions	EP, SEC & NAQA consent	decisions	EP, SEC & NAQA consent
2019	2	0 %	99	97 %	40	25 %
2020	32	68 %	904	84 %	292	56 %
2021	53	81 %	1642	89 %	315	59 %
2022	20	75 %	778	94 %	103	49 %
2023	22	72 %	1365	93 %	163	39 %
2024	18	50 %	1064	94 %	145	48 %

Figure 1. NAQA Decisions

During 2019-2024, the decision on 88% of accreditation cases was accompanied by a unanimous position of the expert panel, SEC, and NAQA Board regarding adopting a decision on accreditation (exemplary accreditation, accreditation, conditional accreditation, refusal of accreditation). At the same time, regarding the determination of the levels of compliance with specific external evaluation criteria, we observe a unanimous position in 66% of cases. Based on the results of consideration of 31% of accreditation cases, the SEC changed the levels of compliance recommended by the expert panel. Most often, the change in the levels of compliance with the criteria occurs from level A to B (12%) since the expert panels interpreted the compliance with the criteria requirements as an exemplary implementation. In 13% of cases, the SEC changed the levels of compliance related to the interpretation of the significance of study programme deficiencies: for 7% of study programmes, the level of compliance with the criteria increased (from E to B), and for another 6%, the level of compliance decreased (from B to E), which resulted in the granting of conditional accreditation.



In conflicting opinions on compliance levels, NAQA can either support the SEC report or escalate the matter to the SEC for a more compelling argument. In the case of establishing the fact of unfounded determination of the study programme’s level of compliance with the criteria requirements, experts may be recommended to undergo additional training.

Table 4. NAQA decisions on the SEC repeated consideration or reevaluation

NAQA Decisions	2019		2020		2021		2022		2023		2024	
	Number of cases	%	Number of cases	%	Number of cases	%	Number of cases	%	Number of cases	%	Number of cases	%
Decision on repeated consideration of the case at the SEC meeting	17	10.49	55	4.18	133	6.13	42	4.44	163	10.08	53	4.12
Decision on re-evaluation	3	1.85	3	0.23	3	0.14	2	0.21	7	0.43	2	0.16
A total of cases considered	162	100	1317	100	2171	100	946	100	1724	100	851	100

It is crucial for NAQA to maintain consistency in applying criteria requirements in the external evaluation procedure. In September 2024, NAQA approved an Annex to the external evaluation report to ensure an unambiguous interpretation of the study programme's external evaluation criteria. This Annex contains a list of possible shortcomings of the study programme and HEI's educational activities, which, if detected, should be interpreted as significant shortcomings. The consequence of identifying such deficiencies should be a reduction in the level of compliance with the criterion. The Annex accompanies the expert panel's report and the SEC report.

*Therefore, the NAQA carries out study programme external evaluation based on clearly defined criteria published in the Regulations on Accreditation. Consistency in interpreting criteria is ensured through the development of guidelines for experts and the systematic organization of webinars and seminars for all accreditation process participants. The process involves reviewing the external evaluation report during the SEC meeting to provide a straightforward method for externally evaluating numerous study programmes.*

**Legislative acts and Additional evidence:**

- Regulation on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>
- Guidelines on the criteria application for study programme accreditation (2024) <https://bit.ly/4gG5Yki>
- Recommendations for experts on the evaluation of internal policies and procedures for ensuring academic integrity and external assessment of their quality (2022)

## ESG Standard 2.6 Reporting

*Full reports by the experts should be published, clear, and accessible to the academic community, external partners, and other interested individuals. If the agency makes any formal decision based on the reports, the decision should be published together with the report.*

The external evaluation report includes general information about the study programme, a report summary, and an analytical component. The analytical section summarizes the facts and evidence concerning adherence to the established criteria. The analysis for each criterion should include a description of the identified good practices and the justification for the level of compliance, identified weaknesses, and recommendations for follow-up actions. The report summary provides an overview of the study programme's quality, highlighting effective practices, identifying areas for improvement, and suggesting recommendations for the HEI's follow-up actions.

The SEC report includes a justified assessment of the study programme according to specified criteria, a recommendation for NAQA's decision, and reasoning based on a thorough review of the self-assessment report, external evaluation report, HEI's comments, and other accreditation materials. The SEC report requires follow-up action recommendations.

To ensure the proper quality of the external evaluation report, NAQA Secretariat reviews the draft report (without being able to influence the decision made by the expert panel). Upon completing the report submission, HEI can access it and offer a reasoned response. After developing the SEC report draft, access to it is given to the HEI and the expert panel to provide a motivated response.

According to § 1 (9) of the Regulations on Accreditation, to ensure openness and transparency of the accreditation process:

1) The following is published on the HEI website: the study programme self-assessment report (no later than five working days from the date of submission to NAQA); the programme of the experts' site visit and notification of the date, time and place of the open meeting (no later than on the next working day after the approval of the programme); NAQA decision, SEC report, external evaluation report (within five working days after NAQA Board decision publication);

2) The following is published in the NAQA Information and Communication System: the order on approval of the expert panel (no later than the next working day after its signing); NAQA Board decision; SEC report; and the external evaluation report (within ten working days after NAQA Board decision).

According to Article 25 of the Law of Ukraine on Higher Education, NAQA enters information on study programme accreditation into the **Unified State Electronic Database on Education**<sup>2</sup> (hereinafter USEDE) within three days of submitting the corresponding certificate (official decision) on the study programme accreditation.

NAQA Information and Communication System was developed to monitor the accreditation case progress at various stages of its consideration, to carry out a transparent and secure exchange of documents, and to provide a response to the external evaluation report and SEC report. It has three modules: Schedule (<https://plan.naqa.gov.ua/>), Accreditation (<https://office.naqa.gov.ua/>), and Public Access.

The Schedule module contains information about the accreditation schedule for the relevant academic year, the possibility for HEI to submit notifications of intentions to accredit the study programme, and corrective notifications (about inclusion, withdrawal of the study programme, or the need to change the planned date of acceptance of the application). The module provides users with free access to view the current accreditation schedule.

The Accreditation module contains information about all procedurally determined stages of the accreditation case consideration. HEI submits the self-assessment report, approves a site visit programme, answers the expert panel's requests, and responds to the external evaluation report and the SEC opinion draft. The expert panel downloads the project of the site visit programme, creates requests to the HEI, downloads the draft report, finalizes and signs the external evaluation report after review, and responds to the SEC report draft. Access of the accreditation process participants to the materials of the accreditation case at its various stages is granted by the established procedure.

The Public Access module provides general access to accreditation cases by unauthenticated users. Functionally, the interfaces for viewing the list of cases are similar to the interfaces for authorized users, considering that an unauthenticated user can view only cases and documents (without the possibility of editing them or performing other actions on the case).

*Therefore, the compulsory publication of the external evaluation report, the SEC report, and NAQA Board decision are established by the Regulations on Accreditation. NAQA Information and Communication System's functionality ensures that all participants in the accreditation process are appropriately informed throughout the various stages of the accreditation case consideration, allowing them to respond to the release of the external evaluation report and the SEC's draft report. NAQA's responsibility in enhancing the implementation of the standard is to improve the quality of the external evaluation reports and SEC's report.*

#### **Legislative acts and Additional evidence:**

- Regulation on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>

#### **ESG Standard 2.7 Complaints and appeals**

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

To ensure trust in the accreditation procedure, safeguard the rights of the HEIs, and ensure fair decision-making, NAQA systematically improves the complaints and appeals procedures.

#### **Appeals**

During 2019-2023, NAQA decisions could be appealed by submitting a corresponding appeal to the NAQA Appeals Committee. As to the NAQA Procedure for Appealing a Decision, there were two possible reasons for filing an appeal: either NAQA made the decision using documents that contained misleading information, which was unknown at the time of the decision-making, or there was a violation of the external review and decision-making process. Based on the decision of the Appeals Committee, NAQA had the right to leave the contested decision of NAQA unchanged or to fully (partially) satisfy the appeal and cancel the contested decision of NAQA. During the specified period, the Appeals Committee received 25 appeals against NAQA decisions considering study programmes' accreditation. Five of them were left without consideration because of the violation of the appeal submission procedure. In two cases, the Appeals Committee noted a violation of the decision-making procedure and recommended that NAQA cancel the relevant decision. NAQA endorsed all the Appeals Committee's recommendations, and in situations where a procedural breach was proven, the respective decision was annulled. The Appeals Committee's rulings, as well as its decisions, are available on the NAQA website. Therefore, NAQA developed a clear and transparent appeals procedure.

Nevertheless, in 2021, NAQA conducted a self-evaluation to assess compliance with the ESG 2015, identifying the need to reform the Appeals Committee to ensure the independence of its decisions. As per the regulations at that point, it was made up solely of NAQA Board members. Therefore, one of the top goals of the National Action Plan for External Quality Assurance of Higher Education for the 2022–2023 period was to enhance NAQA appeals procedure. In 2023, NAQA initiated relevant changes to the Law of Ukraine on Higher Education and developed the Regulation on NAQA Appeals Chamber. This Regulation outlines the requirements for the members of the Appeals Chamber, the process for selecting them through competition, the process for considering appeals, and for reviewing NAQA decisions.

The Appeals Chamber is a permanent, separate collegial unit. It consists of five members elected for a term of two years on a competitive basis. Members of NAQA and its SECs are not eligible to join the Appeal Chamber to protect the impartiality of the decisions rendered. The Competition Commission selects the members of the Appeal Chamber. To take into account the interested parties' needs, the Competition Commission consists of five people:

- two members are nominated by NAQA;
- one member is nominated by The Ministry of Education and Science of Ukraine;
- one member is nominated by the Joint Representative Body of All-Ukrainian Associations of Employers' Organizations;
- one member is nominated by The National Association of Students of Ukraine, a member of the European Union of Students;

The Competition Commission's meeting agenda is available on the NAQA website.

NAQA decision can be challenged by submitting an appeal to the Appeals Chamber or appealing to the court following the procedure established by the legislation of Ukraine. The grounds for appealing the NAQA decision may be the following:

- Violation of NAQA review and decision-making procedure.
- Making the decision based on documents containing false information, which was not known at the time of making such a decision.
- Violation of the evaluation criteria requirements within the NAQA review and decision-making procedure.

Any person whose rights and interests have been challenged may submit an appeal against NAQA decision to the Appeals Chamber within 15 calendar days from the publication date of the relevant decision on its website or posted in the NAQA IT System. The Appeals Chamber considers an appeal against NAQA decision by 30 calendar days from the date of its receipt. The decision of the Appeals Chamber is posted on the NAQA website.

The Appeals Chamber makes a well-reasoned conclusion to either reject or cancel the NAQA decision based on the findings of the review of the appeal against the decision.

If the court opens proceedings on a claim to challenge NAQA decision, which is simultaneously appealed to the Appeals Chamber, the latter stops the appeal's consideration. In the event of judicial annulment of the NAQA decision due to consideration of the accreditation case, NAQA shall re-examine the relevant accreditation case at its meeting.

### ***Complaints***

NAQA considers complaints and proposals that relate, in particular, to the accreditation procedure, following the Law of Ukraine on Citizens' Appeals and the Instructions for the Administration of Appeals from Citizens.

A complaint can be submitted by an individual or a group of individuals. Received complaints are documented and filed for review by the Head or Vice Head of NAQA, who designates the appropriate staff member or structure unit to investigate and draft a response.

Complaints are considered and resolved within up to one month of the day of their receipt, and those that do not require additional investigation do so immediately but within 15 days from the day of their receipt. If it is impossible to resolve the issues raised in the complaint within a month, Head or Vice of NAQA shall set the necessary deadline for its consideration, which shall be notified to the person who submitted the complaint. At the same time, the total time needed to solve the issues raised in the complaint can be at most 45 days.

HEIs have the chance to directly address concerns raised during the external evaluation of the study programme.

- If an expert nominated to the expert panel has a conflict of interest, HEI can apply to NAQA with a statement about it (no later than five business days before the start of the site visit). As a result of its consideration, the expert may be withdrawn from the expert panel.
- HEI may also offer thoughtful feedback on the external evaluation report (within three business days of gaining access to it) and the SEC's draft report (also within three business days of gaining access to it). HEI's remarks are taken into account both at the SEC meeting and when NAQA considers the accreditation case.

*Therefore, an essential part of NAQA's external quality assurance procedures is monitoring the efficiency and openness of appeals and complaint processing. Since the beginning of its work, NAQA has allowed participants in the accreditation process to file complaints and appeal the decisions made by NAQA. NAQA's biggest challenge in complying with Standard 2.7 was strengthening its independence of decision-making during the consideration of appeals and taking into account all stakeholders' viewpoints. For this reason, NAQA initiated changes to Ukrainian legislation in 2022-2024 and established legal bases for the Appeals Chamber to ensure complaints against NAQA decisions could be considered without conflict-of-interest situations. During the fall of 2024, the Appeal Chamber was composed. The full implementation of the specified procedures is defined as a priority direction following the national action plan for external quality assurance of higher education for 2024-2026.*

#### **Legislative acts and Additional evidence:**

- Regulation on Accreditation of Study Programmes in Higher Education (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z1013-24#Text>
- Regulation on the Appeals Chamber of the National Agency for Higher Education Quality Assurance (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/z0179-24#Text>
- Law of Ukraine on Citizens' Appeals (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/393/96-%D0%B2%D1%80#Text>
- Instructions for the Administration of Appeals from Citizens (in Ukrainian) <https://shorturl.at/Wo5Hx>
- Regulation on committees of the National Agency for Higher Education Quality Assurance (in Ukrainian) <https://shorturl.at/tcT6p>

## Section 8: ESG (Part III)

### ESG Standard 3.1: Quality Assurance Policies and Processes

*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.*

#### Frequency of External Quality Assurance Procedures

NAQA conducts accreditation of study programmes as described in the section on compliance with ESG Standard 2.3 of this document. Procedures for institutional accreditation and regulatory framework for independent quality assurance agencies are also developed.

The requirement for regular accreditation of study programmes is explicitly mandated by the Law of Ukraine "On Higher Education" and Regulations on the Accreditation. As stipulated in paragraph 4 of Article 1 of the Law, accreditation is a requisite evaluation of study programmes and related activities at HEIs aimed at ensuring and enhancing educational quality. The Law further defines the periodicity and continuation of accreditation processes. For instance, Articles 3-5 of Article 25 specify that accreditation certificates, once issued, have defined validity periods—five years for accreditation (including "exemplary"), one year for conditional accreditation. These stipulations ensure that each programme undergoes periodic re-accreditation upon the expiration of its current certificate, thereby maintaining a regular and cyclical accreditation schedule. Moreover, paragraph 183 of the Law of Ukraine "On Higher Education" mandates that NAQA conducts post-accreditation monitoring in the third year following an accreditation decision. This requirement not only reinforces the regularity of oversight but also ensures ongoing adherence to quality standards, facilitating timely interventions when deviations occur. Such structured and recurring evaluations underscore the legislated regularity of the accreditation process, essential for upholding the integrity and quality of higher education in Ukraine.

The Agency ensures the regularity of procedures through systematic planning and monitoring. The main evidence includes:

1. Statistical data: see Table 4. NAQA decisions;
2. Schedules and work plans: the accreditation schedule for the 2024-25 academic year (<https://plan.naqa.gov.ua/>) includes 2755 study programme accreditation procedures;
3. Annual reports of the Agency, published on the NAQA official website (<https://naqa.gov.ua/reports-and-self-assessments/>), contain detailed information about the number of conducted procedures, their periodicity, and results.

**Compliance with ESG, Part 2.** All procedures conducted by NAQA comply with the fundamental principles and requirements of ESG:

- are based on transparent Criteria for assessing the study programme (Annex 1 to the Regulations on the Accreditation of Study Programmes is conducted);
- involve stakeholders (experts, representatives of HEIs, students);
- are implemented within an independent and objective assessment of activities.

This is detailed in the section on compliance with ESG Standard 2.3 of this document.



The conduct of external quality assurance procedures regularly confirms the compliance of the Agency's activities with the requirements of Part 2 of ESG, ensuring the trust of HEIs and society in the results of these procedures.

### **Mission and How It Is Implemented in the Actual Activities of NAQA**

At the beginning of 2019, NAQA set its mission to "become a catalyst for positive changes in higher education". However, within a year, it became apparent that different levels of the education system perceive these changes differently. For HEIs, this meant the need to use a consultancy approach to external quality assurance, which involved not only checking but also active support in improving quality processes. NAQA tried to implement this approach from the very beginning: thanks to the openness of accreditation criteria and ample room for their interpretation, experts could offer recommendations that facilitated the improvement of HEI activities. However, the effectiveness of this approach largely depends on the readiness of universities to cooperate, as cooperation allows for the full realization of the potential of expert recommendations. In particular, HEIs that had a clear understanding of the importance of accreditation as a development tool were able to more effectively implement expert recommendations, while others needed additional support to understand the essence of changes. In some HEIs, accreditation is still perceived as a bureaucratic obligation rather than a development tool, often resulting in only formal compliance with requirements without real efforts to improve quality. NAQA is changing the perception of accreditation in HEIs, transforming it from a bureaucratic requirement into an effective development tool. This is achieved through supporting a quality culture and partnering with stakeholders through consultations, training, seminars, and the preparation of methodological materials. The Agency also evaluates the impact of external quality assurance on study programmes. The publication of successful examples, organization of forums and online platforms for exchanging experiences, and the "Quality School" project highlight the importance of accreditation for the development of internal quality assurance systems and promote the understanding of accreditation as a development tool rather than just formal compliance with requirements.

In 2020, legislative changes made accreditation of study programmes mandatory: without a certificate of accreditation, graduates will not receive a diploma. This reinforced the control function of accreditation, focusing on compliance with standards, sometimes at the expense of reducing the consultancy and supportive role that was important for HEIs development. Thus, accreditation often changed its format from consultancy to auditing, which also aligns with the mission of the Agency, providing an objective public assessment.

Analyzing NAQA's activities over five years, it can confidently be stated that it has become a key catalyst for positive changes in higher education in Ukraine, initiating and supporting important reforms and improvements. Confirmation includes:

- **Introduction of a transparent accreditation procedure.** A clear procedure has been developed, clear assessment criteria have been defined, and recommendations and clarifications regarding their application have been provided. This has allowed HEIs to better understand the requirements for study programmes and improve them before undergoing the accreditation procedure.
- **Consultative support for HEIs.** NAQA actively conducts consultations, seminars, and trainings for HEIs, explaining how to effectively implement internal quality assurance processes, helping them clarify important aspects and improve their internal procedures.
- **Training of experts.** An open competition and training of experts have ensured the quality and impartiality of accreditation processes, changing the perception of accreditation from a formal procedure to an objective assessment that provides opportunities for further improvement of study programmes.

- **Integration of ESG 2015.** The quality assessment criteria for study programmes comply with ESG 2015, allowing for the adaptation of ESG and their integration into internal quality assurance systems in Ukraine.
- **Analysis and dissemination of good practices.** NAQA actively promotes the dissemination of good practices through the organization of forums, seminars, and webinars, implementing the "Quality School" project, conducting Sectoral Expert Councils webinars. In Reports on the Quality of Higher Education in Ukraine (<https://naqa.gov.ua/reports-and-self-assessments/>) and scientific articles, examples of the implementation of innovative and exemplary practices in HEIs are published, motivating other universities to improve their processes.
- **Support for European integration processes.** Active cooperation with international partners and movement towards full membership in ENQA and registration in EQAR contribute to the international recognition of the quality assurance system in Ukraine and increase its compliance with ESG.

The key challenge for NAQA is finding a balance between accountability and enhancement, which is reflected in the ESG standards. To overcome this challenge, several important steps have been taken:

1. Enhanced **consultative support** through the conduct of:
  - Targeted webinars and seminars tailored to address the specific challenges faced by individual universities in meeting accreditation criteria, focusing on their unique problems and needs;
  - Thematic webinars and training sessions addressing common mistakes identified during accreditation processes (e.g., the webinar "Current Issues in Awarding Professional Qualifications by HEIs", December 2024).
2. **Enhancement of the Expert Evaluation Methodology.** Clear instructions for experts were developed in 2023 and 2024, providing detailed recommendations for organising their work at various stages, structuring different sections of the report, and ensuring substantiated recommendations aligned with the SMART principles. To further improve the quality of expert evaluations, mandatory training sessions were introduced: the "Report Writing for Accreditation Expertise Results" training (2023) and the "Refinement" training (2024), aimed at enhancing the qualifications and skills of experts.
3. **Structural Changes in Expert Reports.** As of September 2024, the structure of expert reports has been revised. Previously, each criterion included a single section titled "Weaknesses, Drawbacks, and Recommendations". Starting in 2024, the "Drawbacks" and "Recommendations" sections have been separated. The requirement to provide recommendations in the expert report has been a key component from the outset, as stated in the Instructions for Experts. However, this change in the report structure further directs experts' attention to this aspect. Experts are required to provide specific recommendations for each identified drawback. In cases where no drawbacks are detected, and the criterion requirements are fully met, experts must still provide recommendations. These recommendations should aim to help the HEI:
  - Prevent risks of future non-compliance with the criterion requirements;
  - Realize any unused opportunities available to the HEI;
  - Refine the institution's approach to meeting the criterion requirements more effectively.
4. **Introduction of the "List of Major Drawbacks".** In August 2024, NAQA implemented a new tool for evaluation: the "List of Major Drawbacks". This tool has enhanced the objectivity of determining

compliance levels with the accreditation criteria, minimised the risk of misinterpretations, and ensured consistency in approaches to evaluating study programmes. The introduction of this tool has significantly improved the quality and standardisation of experts reports and SEC reports, contributing to a more reliable and transparent accreditation process.

5. **Encouraging Universities to Improve Beyond the Dissemination of Good Practices.** Evidence shows that grant conditional accreditation for a study programme effectively motivates HEIs to address deficiencies, implement recommendations, and enhance their QA systems. While not every study programme achieves full accreditation in the subsequent year, a significant proportion do. Since 2023, for programmes receiving a second conditional accreditation decision, NAQA has conducted a detailed analysis of recurring errors. These analyses are presented in the "Report on the Quality of Higher Education in Ukraine", providing actionable insights for institutions to rectify shortcomings and further improve their educational offerings. This approach reinforces accountability and fosters a continuous quality improvement culture within HEIs.
6. **Conducting Surveys and Adapting to Contemporary Challenges: Enhancing Quality Assurance Processes.** NAQA conducts surveys among HEIs representatives following accreditation procedures to assess their effectiveness and identify opportunities for improvement. These surveys provide valuable insights into institutional needs and serve as a basis for regularly updating the Agency's methodologies. The analysis of survey results enables NAQA to refine its processes and enhance its responsiveness to stakeholder expectations.

### **Responding to Contemporary Challenges: Adapting Quality Assurance Processes**

NAQA consistently demonstrates its ability to adapt QA processes to meet changing external conditions and stakeholder needs. At the onset of the COVID-19 pandemic, within the first two weeks of quarantine, NAQA developed and implemented the "Temporary Procedure for Conducting Accreditation Using Technical Means of Video Communication in pandemic". This innovation ensured the continuity of accreditation for study programmes, adhering fully to legislative requirements, even in the absence of physical expert presence.

In 2022, NAQA once again showcased its flexibility in response to extraordinary circumstances. The full-scale invasion by Russia brought unprecedented challenges, including the destruction of HEIs, the loss of lives among students and faculty, and significant damage to the economy and cultural heritage. Despite these adversities, NAQA has successfully maintained its focus on ensuring the quality of higher education in line with ESG 2015.

Currently, NAQA remains committed to upholding the quality of education even under extraordinary conditions. It continues to integrate into the EHEA, actively preparing Ukrainian higher education for post-war recovery. This dual focus—responding to immediate challenges while laying the groundwork for future development—ensures that Ukrainian higher education remains resilient and aligned with global standards.

**Adapting to Extraordinary Conditions While Maintaining Stability and Quality of Processes.** The following measures and changes have enabled the adaptation to extraordinary conditions while preserving the stability and quality of processes:

1. **Introduction of the Temporary Order of Accreditation of study Programmes in Higher Education under Martial Law.** In 2022, the Temporary Order of Accreditation of study Programmes in Higher Education under Martial Law was introduced ([https://naqa.gov.ua/wp-content/uploads/2022/10/4\\_%D0%94%D0%BE%D0%B4%D0%B0%D1%82%D0%BE%D0%BA-%D0%B4%D0%BE-%D0%BF%D1%80%D0%BE%D1%82%D0%BE%D0%BA%D0%BE%D0%BB-](https://naqa.gov.ua/wp-content/uploads/2022/10/4_%D0%94%D0%BE%D0%B4%D0%B0%D1%82%D0%BE%D0%BA-%D0%B4%D0%BE-%D0%BF%D1%80%D0%BE%D1%82%D0%BE%D0%BA%D0%BE%D0%BB-)

[%E2%84%9619-%D0%B2%D1%96%D0%B4-25.10.2022-%D0%A2%D0%B8%D0%BC%D1%87%D0%B0%D1%81%D0%BE%D0%B2%D0%B8%D0%B9-1.pdf\)](#).

This procedure regulates remote accreditation processes during martial law, allowing accreditation to proceed even when physical access to HEI is not feasible. The temporary procedure ensures the continuation of accreditation processes while maintaining transparency and compliance with quality standards, taking into account the extraordinary conditions posed by wartime circumstances. This approach supports the uninterrupted operation of quality assurance mechanisms, even under the most challenging conditions.

2. **Adaptation of Accreditation Processes in 2024.** Building on the experience of implementing the Temporary Order of Accreditation of study Programmes in Higher Education under Martial Law it became evident that some HEIs unaffected by physical destruction utilised the simplified procedure for accreditation. To address this, modifications were introduced to the Temporary Procedure in 2024, restricting the use of the simplified procedure to specific conditions.

Under the revised procedure, NAQA is authorised to grant one-year conditional accreditation under a simplified process for study programmes only in the following circumstances:

- The study programme is implemented in a HEI that was temporarily relocated after February 24, 2022;
- The study programme is delivered by an institution categorised as one with specific learning conditions, including higher military educational institutions or military training units;
- Force majeure circumstances caused by military actions of the aggressor country render it impossible to conduct accreditation under the standard procedure, including remote and blended formats;
- The study programme is implemented in a HEI undergoing reorganisation.

These changes ensure that the simplified procedure is applied equitably and only when genuinely necessary, maintaining the integrity and quality of the accreditation process while addressing the challenges posed by wartime conditions.

3. **Response Measures to Force Majeure and Circumstances Preventing Proper Completion or Submission of the Expert Evaluation and/or Report.** In accordance with clause 8 of section III of the Regulations on the Accreditation of Study Programmes (2024), if force majeure circumstances arise during the accreditation process that prevent its continuation and are not attributable to the fault of the HEI, NAQA has the authority to suspend the accreditation procedure. Furthermore, as per clause 12 of section II, if circumstances occur during the stage of expert evaluation that hinder the proper completion or submission of the evaluation and/or the expert report, this constitutes grounds for cancelling the decision to appoint an expert group. In such cases:

- The expert group loses its authority to proceed with the evaluation.
- A new expert group is appointed in accordance with the established regulations.

These measures ensure that the accreditation process is not compromised by unforeseen obstacles, maintaining the integrity and quality of the evaluation while allowing for procedural adjustments when necessary.

4. **Support for Internally Displaced Students.** In 2022, NAQA launched an initiative to identify HEIs willing to host students from combat zones for temporary education. This measure became a crucial component of humanitarian support, ensuring the continuity of the educational process for affected students during times of crisis.

Given the pivotal role of NAQA in ensuring the quality of higher education during wartime, on June 25, 2024, NAQA approved the "Strategy of the National Agency for Higher Education Quality Assurance to 2026," updating its mission to:

"To ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders."

The strategy outlines the following strategic goals ([https://en.naqa.gov.ua/?page\\_id=642](https://en.naqa.gov.ua/?page_id=642)):

- To become full member of the European Association for Quality Assurance in Higher Education (ENQA) and to be registered in the European Quality Assurance Register for Higher Education (EQAR);
- To modernise external higher education quality assurance system, in particular, through developing the institutional accreditation model and launching the independent institutions for higher education quality evaluation;
- To encourage innovative practices in HEIs in the interaction of research, education, and business.

These steps are aimed at creating a stable and resilient culture of quality in Ukrainian higher education and its integration into the EHEA. The strategy defines the values and principles of the internal culture of NAQA.

These initiatives are designed to foster a stable and resilient culture of quality in Ukrainian higher education and facilitate its integration into the EHEA. The Strategy outlines the values and principles underpinning the internal culture of NAQA. Core values remain stable: partnership, innovation, responsibility, integrity, openness, transparency, independence, professionalism, trust. The changes in the articulation of these values reflect NAQA's strategic reflection and its proactive response to contemporary challenges. A particular focus has been placed on improving work quality and efficiency, ensuring transparency and openness in the Agency's activities, and highlighting the importance of moral principles, integrity, and professionalism. The principles guiding the organisation's internal culture include:

- Respect for everyone's opinion, collegiality, and desire for consensus;
- Striving for self-improvement, and self-development based on critical self-assessment;
- Cultivating a spirit of mutual support, sincerity, and initiative;
- Building and maintaining institutional and personal reputation

These values and principles serve as a foundation for the NAQA's operations, ensuring its resilience, adaptability, and effectiveness in navigating contemporary challenges while maintaining high standards of quality and integrity.

NAQA demonstrates adaptability and flexibility in implementing its Strategy through the following key aspects:

1. **Annual Updating of Strategy Implementation Plans.** The annual development of implementation plans allows for consideration of current challenges, external changes, and emerging opportunities. This dynamic approach ensures timely adaptation to rapidly changing conditions and promotes responsiveness to evolving needs ([Implementation Plan 2024-2026](#)).
2. **Involvement of All Levels of the Organisation.** The formulation of annual strategy implementation plans involves the Head and Vice Heads of NAQA, NAQA Board members, NAQA Committees, Head of the Secretariat, and its structural units, based on their functional responsibilities. This multi-level approach ensures thorough analysis, integration of diverse perspectives, and effective responses to changes and innovations at each stage of implementation.



3. **Control Through Monitoring, Self-Analysis, and External Evaluation.** NAQA members, supported by the Secretariat and its structural units, oversee the monitoring of strategy implementation. Continuous monitoring and self-analysis help rapidly identify deficiencies, evaluate the effectiveness of strategic goals, and make necessary adjustments. The involvement of external experts provides independent assessments, ensuring alignment with international standards and enhancing the credibility of the process.
4. **Transparency and stakeholder engagement.** Openness in planning and implementation processes facilitates the consideration of partners' interests, who are sources of new ideas and feedback. This forms the basis for flexible review of approaches in the event of changes in conditions or stakeholders' expectations.
5. **Focus on continuous improvement.** The strategy is aimed at continuous improvement and the introduction of new approaches, which supports its relevance in the context of global changes and technological development. This process ensures stability in achieving strategic goals and, at the same time, creates opportunities for adaptation to challenges that may arise in socio-economic, political, or technological changes.

Through these measures, NAQA's strategy remains robust and responsive, fostering a culture of excellence in higher education quality assurance while adapting to a dynamic global environment.

### Stakeholder Engagement

Stakeholder engagement is a cornerstone principle of NAQA. During the drafting of the "Law on Higher Education" in the 2010s, the NAQA's structure was designed to represent the interests of a broad range of stakeholders in the higher education system. The initial version of the law, adopted in 2014, stipulated that Agency members would be elected by representatives of HEIs, employers, and students. Furthermore, these organisations were granted the authority to recall their representatives if necessary. In practice, however, this mechanism proved ineffective. Agency members became reliant on the interests of their electors, which at times led to conflicts of interest and lobbying. These challenges necessitated a reform of the agency's formation procedure in 2017.

**Evolution of the Agency Formation Procedure.** A number of changes were made to mark a significant improvement, achieving a balance between stakeholder representation and merit-based selection while safeguarding the agency's independence.

Changes between 2019 and 2024 regarding the Agency composition (Article 19 of the Law on Higher Education of Ukraine):

1. **Agency composition.** A clarification was introduced to limit representation to one individual per field of knowledge among candidates. This measure ensures balanced representation across various areas of higher education, allowing for a broader and more comprehensive perspective on the challenges and needs of all stakeholders.
2. **Eligibility requirements.** The list of restrictions for potential agency members was expanded to include additional criteria concerning academic integrity and individuals connected with the aggressor state or occupied territories. These changes strengthen stakeholder trust by enhancing the Agency's independence and transparency in its activities.
3. **Establishment of the appeals chamber.** The creation of the Appeals Chamber to review complaints against agency decisions, along with the regulation of its activities, further bolsters the transparency and accountability of the Agency's operations. This initiative significantly contributes to fostering trust among stakeholders.



These reforms collectively promote diverse stakeholder engagement, enhance transparency, and establish a more effective and independent model for NAQA.

**Stakeholder Participation Beyond Agency Formation.** Stakeholder participation goes beyond the composition of NAQA and forms a foundational principle of its governance model. This principle shapes decision-making processes and approaches implemented over the past six years. Stakeholders are actively involved at every stage of decision-making—from the initial formulation of strategy to the final evaluation of the effectiveness of decisions. This inclusive approach ensures that diverse perspectives are integrated, fostering transparency, accountability, and continuous improvement in the agency's activities.

**Mechanisms Ensuring Stakeholder Participation in Governance and Decision-Making Within NAQA.** To guarantee transparency, openness, and the inclusion of diverse stakeholders, NAQA employs the following mechanisms:

1. **Collegial governance.** NAQA functions as a permanent collegial body where decisions are made by a majority vote of its members. Representatives of various stakeholder groups: HEIs, student associations, employers, research institutions, and other organisations hold equal rights in decision-making. This structure ensures a balance of interests among diverse stakeholders and promotes equitable representation.
2. **Transparency and publicity of decisions.** Decisions, meeting minutes, and other critical information regarding the agency's activities are made publicly available on its official website. This approach ensures that stakeholders, including HEIs, public organisations, students, employers, and international institutions, have access to the NAQA's outcomes. Such transparency fosters discussion, evaluation, and an opportunity to influence accreditation processes and broader education quality assurance measures.
3. **Formation of Sectoral Expert Councils.** SECs are composed of academic and scientific staff, students, employers, and international experts, ensuring a comprehensive consideration of the diverse needs and interests of stakeholders during evaluations. This inclusive structure enhances the robustness and relevance of NAQA's assessments and recommendations.
4. **Engagement of international Experts.** International experts are involved in expert groups, with their participation being mandatory during the accreditation of study programmes jointly developed by Ukrainian and foreign HEIs. Their involvement facilitates the integration of international expertise, enabling a comparative analysis of educational practices and the provision of recommendations grounded in global best practices.
5. **Employer representation.** Employers are represented within NAQA, SECs, and expert panels, based on nominations from employers, organisations, or professional associations.
6. **Accreditation procedure.** During expert panels to HEIs as part of the accreditation process, employers and students have opportunities to provide feedback and suggestions for improving study programmes.
7. **Election of Agency leadership.** The Head and Vice Heads of NAQA are elected at the first Agency meeting through voting by its members. This democratic process allows all stakeholders represented in the agency to participate in the leadership selection, ensuring openness and accountability in governance.
8. **Financial management.** NAQA's activities are funded by the state budget and accreditation service fees. As a key stakeholder, the state determines funding levels and monitors the efficient use of resources to ensure alignment with the broader goal of higher education development.

9. **Consultations and public dialogue.** NAQA regularly engages stakeholders through national and targeted events for HEIs, consultations, and working groups (e.g., institutional accreditation model development). Meetings with student associations address higher education issues, while joint training sessions on quality assurance are conducted for students. Regulatory drafts developed by the agency undergo public consultation, ensuring inclusivity in decision-making.
10. **Evaluation of Agency effectiveness.** NAQA conducts stakeholder surveys among experts, SEC members, HEI representatives, students, teachers, and employers to assess its effectiveness. These surveys evaluate accreditation results and other initiatives. Results are published in annual reports, Reports on Higher Education Quality in Ukraine, and other analytical materials (e.g., [NAQA Report on HEI and Experts' Surveys: December 2019 – March 2020](#)).
11. **Annual reporting to Parliament.** Each year, NAQA presents its performance results to the Education and Science Committee of the Verkhovna Rada (Parliament) of Ukraine. To ensure independent evaluations, international experts from the Advisory Board provide recommendations on strategic decisions and procedural improvements ([https://en.naqa.gov.ua/?page\\_id=1430](https://en.naqa.gov.ua/?page_id=1430)).

These mechanisms collectively ensure the active engagement of stakeholders in NAQA's governance and decision-making processes, fostering transparency, openness, and accountability while integrating diverse perspectives to enhance the quality of higher education in Ukraine.

### Publicity and Transparency

NAQA ensures open access to key documents that reflect its mission, objectives, and activity outcomes. These include:

- Mission and strategic goals, as described in the approved Strategy: [https://en.naqa.gov.ua/?page\\_id=642](https://en.naqa.gov.ua/?page_id=642).
- Charter of the National Agency for Higher Education Quality Assurance: <https://zakon.rada.gov.ua/laws/show/71-2024-%D0%BF#Text>
- Regulatory documents: Regulations on Accreditation of Study Programmes (<https://zakon.rada.gov.ua/laws/show/z1013-24#Text>).
- Instructional and Methodological Materials: Recommendations on the Application of the Criteria for Quality Assessment of Study Programme (2020) and Clarifications on the Application of the Criteria for Quality Assessment of Study Programme (2024).
- Annual Reports (available in [Ukrainian](#), [English](#)).
- Accreditation Results: Decisions are published in the *Protocols of NAQA Meetings* (<https://naqa.gov.ua/%d0%bf%d1%80%d0%be%d1%82%d0%be%d0%ba%d0%be%d0%bb%d0%b8-%d0%b7%d0%b0%d1%81%d1%96%d0%b4%d0%b0%d0%bd%d1%8c-%d0%b0%d0%b3%d0%b5%d0%bd%d1%82%d1%81%d1%82%d0%b2%d0%b0/>) and accreditation cases (<https://public.naqa.gov.ua/>).

**Communication Channels.** NAQA utilises a range of communication platforms to engage with the public and ensure accessibility:

- Official Website, where all key documents, decisions, and updates are published in both Ukrainian and English, ensuring comprehensive public access.

- Social Media: used to inform about events, initiatives, and innovations (Facebook: <https://www.facebook.com/nazyavo/>, X [https://x.com/naqa\\_ua/](https://x.com/naqa_ua/), LinkedIn <https://www.linkedin.com/company/naqa-ukraine/>).

This commitment to publicity and transparency not only fosters trust in NAQA's activities but also contributes significantly to the improvement of higher education quality in Ukraine.

### Distinguishing External Quality Assurance from Other Activities

NAQA undertakes a range of activities beyond external quality assurance, reflecting its diverse responsibilities and authority. These activities include:

- **Regulatory development.** NAQA develops and submits for approval by the Ministry of Education and Science Regulations on Accreditation of Study Programmes, Institutional Accreditation of Higher Education Institutions, Accreditation of Independent Quality Assessment and Assurance Institutions, Regulations on the Appeals Chamber, and relevant amendments;
- **Approval of higher education standards.** NAQA approves standards of higher education formulated by the Ministry of Education and Science;
- **Maintenance of accreditation records.** NAQA enters information into the USEDE regarding certificates (official decisions) on the accreditation of study programmes issued by foreign accreditation or quality assurance agencies, as per the list approved by the Cabinet of Ministers of Ukraine (Resolution No. 554, July 10, 2019);
- **Revocation of academic degrees:** NAQA cancels decisions of one-time specialised academic councils on awarding the degree of Doctor of Philosophy if evidence of academic plagiarism, fabrication, falsification, or procedural violations during the defence is found, in accordance with the procedure established by Cabinet Resolution No. 44 (January 12, 2022);
- **Academic misconduct investigation:** NAQA establishes facts of academic plagiarism, fabrication, or falsification and prepares recommendations for the Ministry of Education and Science to cancel decisions on awarding candidate or doctor of sciences degrees;
- **Criteria for quality assessment:** NAQA develops criteria for assessing the quality of educational activities and scientific achievements of higher education institutions, forming the basis for institutional rankings;
- **Doctoral degree procedures:** NAQA develops and submits for approval the procedure for awarding and revoking doctoral degrees, following the established process outlined by the Cabinet of Ministers of Ukraine;
- **Recognition of foreign qualifications:** NAQA approves the procedure for recognising higher education degrees and scientific degrees obtained abroad, as developed by the Ministry of Education and Science;
- **Accreditation of independent institutions:** NAQA accredits independent quality assessment and assurance institutions for higher education and maintains their register;
- **Contribution to state order formation:** NAQA participates in forming indicators for the state order for higher education specialist training, aligning with medium-term labour market forecasts.

To maintain a clear distinction between external quality assurance and other operational areas, NAQA implements the following measures:

- Activities related to external quality assurance are managed exclusively by the Study Programmes Accreditation Department, Expert Support Department, Support of Sectoral Expert Councils Department. Other operational areas, such as legal support, analytics and training activities, and oversight of one-time specialised academic councils, are coordinated by separate structural units, including the Legal Department, Analytics and Training Support Department, and Academic Integrity and One-time Councils' Operation Department;
- Internal regulatory acts delineate distinct processes for external quality assurance and other activities, ensuring no overlap in procedural implementation or governance.
- External quality assurance procedures are funded through specific budget lines, clearly separated from the funding allocated for other activities. This prevents financial intermingling and reinforces operational independence.

Thus, NAQA fully complies with the requirements of ESG 3.1. NAQA conducts regular external quality assurance procedures in alignment with ESG standards, with clearly defined objectives and tasks that are publicly accessible and embedded into its daily operations. Key evidence of compliance includes: the regularity of quality assurance procedures, adhering to established schedules and regulatory requirements, the publication of reports and results of procedures, ensuring transparency, the publicity and accessibility of strategic documents that outline the agency's mission and goals, the active involvement of stakeholders in governance and decision-making through diverse communication channels and forums, the engagement of international experts and employers, enhancing the quality and relevance of evaluations, the clear separation of external quality assurance activities from other operational areas through regulatory frameworks, organisational structures, and distinct financing mechanisms.

### **ESG Standard 3.2 Official Status**

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

### **Legal Status of NAQA**

The foundation of the Agency's activities is the Law of Ukraine "On Higher Education" (No. 1556-VII dated 01.07.2014), which defines its legal status, tasks, functions, and powers, as well as the Charter of NAQA, approved by the Resolution of the Cabinet of Ministers of Ukraine.

Specifically:

- Article 17 of the Law states that NAQA is a public law entity operating in accordance with this Law and the Charter approved by the Cabinet of Ministers of Ukraine.
- Part 2 of Article 16 defines NAQA as the body responsible for assessing the internal quality assurance system of HEIs regarding their educational activities and the quality of higher education. This assessment is conducted based on HEIs' submissions to ensure compliance with the quality assurance system requirements for higher education, as approved by NAQA.
- Part 1 of Article 18 establishes that NAQA's powers include: accreditation of study programmes; institutional accreditation; conducting post-accreditation monitoring; accrediting independent institutions for quality assessment and assurance in higher education; maintaining a Registry of accredited institutions.

NAQA operates under the Constitution and laws of Ukraine, decrees of the President of Ukraine, and resolutions of the Verkhovna Rada (Parliament) of Ukraine adopted in accordance with the Constitution and laws of Ukraine, acts of the Cabinet of Ministers of Ukraine, other legislative acts, and the NAQA's Charter.

In implementing public policy in the field of quality assurance in higher education, NAQA collaborates with the Cabinet of Ministers of Ukraine, the Ministry of Education and Science, other central and local executive bodies, the National Academy of Sciences, national sectoral academies of sciences, local government bodies, public associations, enterprises, institutions, organizations, scientific institutions, and higher education institutions of foreign countries, as well as international organizations in higher education.

### **Recognition of External Quality Assurance Results**

The accreditation results of study programmes are officially recognized and have legal implications, primarily affecting HEIs. Accreditation serves as a prerequisite for HEIs to award diplomas of higher education to their graduates, underscoring the mandatory nature of this process. The results of external quality assurance also influence crucial decisions made by the Ministry of Education and Science of Ukraine, such as the allocation of funding to HEIs, including state orders for training personnel, and the development of educational policies. Moreover, according to the Licensing Conditions for Educational Activities, only those study programmes that have been accredited are eligible to enroll international students. This stipulation highlights the importance of accreditation in maintaining the standards and international competitiveness of Ukrainian HEIs. Accreditation results are made publicly available through several platforms, including the USEDE (<https://registry.edbo.gov.ua/>), the official NAQA website, and the websites of the HEIs themselves. Applicants must be formally informed of the accreditation status of the study programme, ensuring transparency and informed decision-making regarding their choice of institution.

**Accreditation as a Measure of Educational Quality.** The results of external quality assurance are recognized by the state as official data for evaluating the level of education quality in Ukraine. In line with Part 2 of Article 18 of the Law on Higher Education, NAQA annually prepares and publishes a Report on the Quality of Higher Education in Ukraine, which includes an analysis of higher education alignment with the tasks of sustainable innovative development of society and proposals for legislative support to enhance higher education quality. These reports are sent to the Verkhovna Rada (Parliament) of Ukraine, the President of Ukraine, the Cabinet of Ministers of Ukraine, and higher education institutions for discussion and appropriate action.

**Accreditation as a Driver of Partnerships and Development.** Accreditation strengthens collaboration between universities and employers, facilitating regular exchanges of labor market information. This cooperation fosters the creation of joint programmes aligned with market demands and enables higher education institutions to adapt educational offerings to emerging needs. Key benefits of accreditation include improved practical training and adaptation to labor market needs. Accreditation also helps identify the need for new or improved programmes for training professionals in rapidly developing fields, such as IT, biotechnology, or financial technologies, oriented towards labor market demands. NAQA actively collaborates with stakeholders to enhance the relevance and quality of study programmes. Notable examples include cooperation with the National Union of Journalists of Ukraine to align journalism programmes with industry standards, partnership with LLC "SoftServe Academy" to integrate cutting-edge IT training aligned with labor market demands.

**Strategic Impact of External Quality Assurance.** The outcomes of external quality assurance serve as a foundation for strategic initiatives in higher education. These include increasing university funding, revising and modernizing study programmes, introducing innovative teaching methodologies and reforming academic and administrative procedures.

**Global Membership, International Collaboration and Recognition.** NAQA is a member of five international organizations dedicated to quality assurance and academic integrity: INQAAHE, CEENQA, GAIN, ENAI (full



member), ENQA (associate member). These memberships highlight NAQA's recognition and active role at the international level, aligning its operations with European standards of transparency and efficiency.

NAQA collaborates with leading international organizations, including: OSCE, National Erasmus+ Office in Ukraine, British Council, USAID. NAQA serves as a partner in various Erasmus+ projects, including SimS, EDUQAS, SmartPL, Optima, DigiUni, CLOUD HED, UkraineDigiTrans, DOMANI. These projects significantly contribute to modernizing curricula, developing innovative teaching methods, supporting the integration of Ukrainian HEIs into international standards.

NAQA aids Ukrainian HEIs in adapting their programmes to meet international standards, enhancing their competitiveness in the global education and research landscape.

NAQA monitors and evaluates the effectiveness of implemented projects, allowing for strategic adjustments based on real-time results. NAQA representatives regularly participate in international conferences, forums, seminars, and webinars, underscoring their active role in global discussions on education quality assurance.

**Recognition and Impact of External Quality Assurance Results.** The results of external quality assurance are not only recognized but are also actively leveraged to improve the quality of education. As demonstrated in the section on compliance with ESG Standard 3.1, a majority of study programmes that initially received conditional accreditation achieve full accreditation within a year by addressing recommendations and rectifying deficiencies.

This is further substantiated by the findings of the post-accreditation monitoring experiment, the two stages of which were conducted in 2024. Out of 36 accreditation cases involving 27 HEIs participating in the second stage of the experiment: 16 study programmes achieved a decision of "successful completion of monitoring", 20 study programmes received a decision of "partial non-compliance". These outcomes underscore the effectiveness of NAQA's processes in driving continuous improvement in higher education quality.

Thus, NAQA fully meets the requirements of ESG 3.2, as it holds an official legal status, as defined by the Law of Ukraine "On Higher Education", is recognized as a competent authority for quality assurance in higher education, produces results that are recognized and utilized by the state, higher education institutions, stakeholders, and the public, is acknowledged at the international level.

### **ESG Standard 3.3: Independence**

*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.*

#### **Organisational Independence**

The organisational independence of NAQA is legally established through the Law of Ukraine "On Higher Education" and the Charter of NAQA, ensuring its autonomy in fulfilling its responsibilities. Key provisions include:

1. **Permanent Collegial Body.** NAQA is explicitly defined as a permanent collegial body, reinforcing its collective decision-making structure. This is detailed in Part 1, Article 17 of the Law of Ukraine "On Higher Education" and Part 1 of the Charter of NAQA.
2. **Public Law Entity:** NAQA operates as a public law entity, founded by the state but functioning independently of direct state control. This is affirmed in Part 2, Article 17 of the Law of Ukraine "On Higher Education" and Part 5 of the NAQA Charter.
3. **The Head, Vice Heads, other members of NAQA, and employees of its secretariat** are not subject to the Law of Ukraine "On Civil Service", as stated in Part 5 of the Charter of NAQA. This exemption ensures freedom from direct governmental influence, allowing NAQA to maintain its impartiality and objectivity.



**Evolution of NAQA's Legal Status.** Until March 2021, Part 1 of Article 17 of the Law of Ukraine "On Higher Education" defined NAQA as the entity authorized to implement state policy on higher education quality assurance. This designation was in direct conflict with the Law of Ukraine "On Central Executive Bodies," which stipulates that only executive authorities are permitted to implement state policy. This misclassification misrepresented NAQA as an executive authority, undermining its crucial role as an independent quality assurance body. This legal contradiction prompted legislative proposals to officially classify NAQA as a central executive authority. Recognizing NAQA in this way would have significantly undermined its independence, as central executive bodies are directly accountable to and controlled by the government. This shift would have jeopardized the foundational principle of independence. For more details on this see <https://naqa.gov.ua/2020/10/%D1%94%D0%B2%D1%80%D0%BE%D0%BF%D0%B5%D0%B9%D1%81%D1%8C%D0%BA%D0%B0-%D0%B0%D1%81%D0%BE%D1%86%D1%96%D0%B0%D1%86%D1%96%D1%8F-%D0%B7%D0%B0%D0%B1%D0%B5%D0%B7%D0%BF%D0%B5%D1%87%D0%B5%D0%BD%D0%BD%D1%8F-2/>. In response to this critical issue, NAQA took proactive steps by initiating amendments to the "Law on Higher Education" and its own Charter. These amendments aimed to eliminate any references to state policy implementation from its responsibilities, thereby clearly reaffirming its independent status. This decisive action effectively resolved the legal ambiguities, preserving NAQA's autonomy and ensuring its compliance with international standards for independent quality assurance.

**Outcomes of Legislative Changes.** The amendments introduced not only clarified NAQA's role but also ensured its operational independence and alignment with international standards. These legislative changes yielded several significant outcomes:

- The Agency's status as an independent body was explicitly defined, minimising the risk of legal claims and improper interference in its operations.
- The changes confirmed that the Agency operates independently of the executive branch, safeguarding its autonomy in decision-making and execution of its functions.
- The amendments clarified the legal status of NAQA officials, closing a prior legal loophole and ensuring consistency with anti-corruption and governance legislation.
- Provisions suggesting subordination to state bodies were removed, aligning NAQA's activities with international standards, and enhancing its standing as a credible quality assurance authority.
- By reducing the potential for political interference, the changes strengthened the objectivity of NAQA's decisions, bolstering public trust in the Agency as an impartial and professional institution.

**Interaction with Other Institutions.** According to Part 3 of the Charter: "NAQA cooperates with the Cabinet of Ministers of Ukraine, the Ministry of Education and Science, other central and local executive bodies, the National Academy of Sciences and national sectoral academies of sciences, local government bodies, public associations, enterprises, institutions and organizations, scientific institutions and higher education institutions of foreign countries, as well as with international organizations in the field of higher education". This wide-ranging interaction highlights the Agency's active role in both national and international quality assurance processes. Importantly, interactions with executive authorities are grounded in partnership principles, not subordination, underscoring its independent status.

**Financial and Administrative Autonomy.** Part 5 of the Charter states: "NAQA acquires the status of a legal entity from the date of its state registration, has an independent balance sheet, registration accounts in the Treasury bodies, foreign currency accounts in banks, and a seal with its name." This provision confirms the Agency's financial and administrative autonomy, enabling it to operate free from external influence. The

ability to open accounts ensures efficiency in financial transactions, reinforcing its operational independence.

According to Part 6 of the Charter: "The budget, plan of appropriations from the general fund of the budget, and staff schedule of NAQA for the corresponding year and changes to them are approved by the Ministry of Education and Science." While this indicates interaction with the Ministry, it is a standard practice to ensure the transparent and accountable use of public funds. This requirement does not limit the Agency's functional autonomy or its ability to make independent operational decisions, aligning with European standards for financial oversight of public institutions.

Part 7 of the Charter guarantees: "NAQA has the right, according to the established legislative procedure, to enter into contracts, conduct other legal transactions, acquire property and non-material rights, bear obligations, and be a plaintiff and respondent in court." This provision highlights the Agency's full legal capacity as an independent legal entity. Its ability to participate in legal proceedings further underscores its autonomy, ensuring it can defend its interests without external interference.

The primary sources of funding for NAQA are allocations from the state budget, which include general and special funds. The special fund is replenished through fees collected for accreditation services. Core operational needs, such as salaries and utilities, are covered by the general fund, which is safeguarded and can only be discontinued if the Agency is dissolved. The collection of accreditation fees from HEIs, irrespective of the outcome of the accreditation decision, further ensures financial independence, supporting the objectivity and impartiality of procedures and conclusions.

Thus, the organisational independence of the Agency is firmly enshrined in legislation. This independence is characterized by the absence of subordination to executive bodies, autonomy in management and legal capacity, and equitable interaction with other entities. Such provisions align with international standards, reinforcing trust in the Agency's decisions at both national and international levels. Additionally, this autonomy provides robust protection against political or administrative influence, ensuring the objectivity, transparency, and credibility of its activities.

### **Operational Independence**

NAQA's operational independence is defined by its capacity to function without external interference from state authorities or other interested parties. This autonomy ensures that the agency independently determines its priorities, makes decisions regarding the execution of its functions, and implements policies in the field of higher education quality assurance.

Key principles ensuring Operational Independence:

- *decision-making autonomy*: NAQA independently establishes strategic goals, activity directions, and quality assessment methodologies, free from external or political influence.
- *transparency*: accreditation outcomes, evaluation criteria, and decisions are publicly accessible, fostering trust and openness;
- *expertise*: accreditation procedures are grounded in independent expert evaluations based on clearly defined criteria, ensuring objectivity and reliability;
- *accountability*: NAQA regularly reports its activities to the public (e.g., annual reports, Reports on Quality in Higher Education of Ukraine), government bodies (e.g., the Committee on Education, Science and Innovations of the Verkhovna Rada (Parliament) of Ukraine), and international partners, affirming its transparency and responsibility.

The agency ensures operational independence through several specific mechanisms:

1. **Legal autonomy.** NAQA operates as an independent public law entity, free from interference by external parties, ensuring the integrity of its operations.
2. **Clear separation of roles.** The accreditation process distinctly defines responsibilities for decision-making, safeguarding evaluation procedures from external influence. All procedures and evaluation criteria are established in legislation, supported by detailed guidelines and clarifications. This structure ensures decisions are based solely on objective criteria and allows for effective process control.
3. **Confidentiality mechanisms.** NAQA enforces strict confidentiality policies, restricting access to documents and data until official decisions are made. Experts and Secretariat staff adhere to high ethical standards, ensuring the confidentiality of sensitive information. Experts are prohibited from disclosing restricted-access data or confidential information obtained during accreditation reviews to third parties. Experts must not reveal information that could harm the reputation of higher education institutions or NAQA, as stated in Clause 14 of the Contract for Conducting Accreditation Review (<http://surl.li/taqawb>).
4. **Feedback mechanisms.** After each review, the Agency gathers feedback through surveys targeting representatives of HEI, experts, and observers. These surveys evaluate expert performance, the draft report, and the overall review process, incorporating perspectives from multiple stakeholders. This approach ensures an objective assessment and mitigates potential external influences on the outcomes.
5. **Monitoring and response mechanisms.** The agency employs robust monitoring and response mechanisms to safeguard operational independence and uphold the integrity of its processes:
  - NAQA systematically evaluates its internal operations to detect potential risks or violations, including breaches of confidentiality or impartiality in assessments. Measures are developed to prevent, mitigate consequences, and eliminate potential corruption risks. For instance, in 2021, the agency conducted an in-depth analysis of its 2020-2021 Anti-Corruption Programme: analytical reports were prepared for each agency function, vulnerable functions and processes were identified, specific measures to minimize risks were determined. These reports are publicly accessible: <https://naqa.gov.ua/%d0%b7%d0%b0%d0%bf%d0%be%d0%b1%d1%96%d0%b3%d0%bd%d0%bd%d1%8f-%d0%ba%d0%be%d1%80%d1%83%d0%bf%d1%86%d1%96%d1%97/>. A similar analysis has been ongoing since November 2024, ensuring continuous improvement.
  - When violations are identified, NAQA promptly acts to address them: identifies causes and assesses the impact of violations on overall agency activities, reviews and revises internal policies, procedures, and standards to address identified issues and strengthen preventive systems, applies sanctions, where necessary, to individuals responsible for serious violations, including experts or agency staff, informs stakeholders about the actions taken to ensure transparency.

NAQA's policies and approaches to operational independence have evolved and improved based on accumulated experience. Initially, the focus was on the fundamental principles of independence in evaluations, but over time, the Agency has refined its methods, including: enhancing the process for selecting experts for expert groups, clearly defining conflict-of-interest situations; involving international experts in sectoral expert councils and expert groups since 2022; and conducting corruption risk analyses since 2020.

Thus, NAQA's operational independence is underpinned by clear procedures, transparency, and accountability, ensuring the objectivity and effectiveness of accreditation processes while maintaining public trust and confidence.

### Independence of Conclusions

The Agency ensures that expert conclusions, SEC opinions, and agency decisions are grounded in objective, verified facts and remain free from external or internal influence. This independence is upheld through the following mechanisms:

### 1. Engagement of Independent Experts.

- *Conflict-free selection for expert panels.* Evaluation of study programmes is conducted by experts without financial, professional, or personal ties to the HEIs being evaluated. Experts must formally declare the absence of conflicts of interest in the Contract for conducting accreditation review (Clause 17);
- *Mandatory qualifications.* Experts are selected from the Registry based on their specialization. For PhD programme accreditations, at least one expert in the group must hold a Doctor of Science degree, ensuring evaluations are grounded in objective expertise;
- *Conflict of interest verification.* NAQA employs a database to track the connections and status of experts, verifying the absence of conflicts of interest. In cases where undisclosed conflicts are identified, such experts are removed from the Registry. For example, in 2023, a re-accreditation was initiated due to an undisclosed conflict of interest by an expert group leader, which had influenced the group's conclusions.
- *International perspective.* To strengthen independence, sectoral expert councils include international experts. International experts may also join expert groups upon the request of the HEI.
- *Student participation.* The inclusion of students in both sectoral expert councils and expert groups contributes an independent and diverse perspective.
- *Transparent selection process.* The selection of experts is conducted openly and publicly. Information on candidates, selection criteria, and procedures is published on the agency's website. The outcomes of the selection process are documented in agency meeting protocols. The expert registry is regularly updated to reflect changes in status, professional affiliations, and publications.

**2. Evaluation by International Partners.** International experts from the Advisory Board are regularly engaged in reviewing the NAQA's Annual reports and Reports on Higher Education Quality of Ukraine, ensuring alignment with global standards. The Agency actively presents and discusses its procedures and results at international events, including seminars, training sessions, internships, conferences, and forums. This engagement facilitates the integration of global best practices and provides valuable feedback for continuous improvement. In 2022, the Agency developed recommendations for experts on reviewing internal academic integrity policies through the Academic Integrity and Quality Initiative. This initiative was implemented by the American Councils for International Education with support from the U.S. Embassy in Ukraine and the Ministry of Education and Science (<https://naqa.gov.ua/wp-content/uploads/2022/06/3.-%D0%A0%D0%B5%D0%BA%D0%BE%D0%BC%D0%B5%D0%BD%D0%B4%D0%B0%D1%86%D1%96%D1%97-%D0%B4%D0%BB%D1%8F-%D0%B5%D0%BA%D1%81%D0%BF%D0%B5%D1%80%D1%82%D1%96%D0%B2-%D0%90%D0%BA%D0%94.pdf>).

**3. Mechanisms for Addressing Comments During Review.** NAQA has established transparent procedures for submitting comments at various stages of the review process. These include responses to expert group reports, feedback on draft conclusions by SEC, presentations by HEI representatives during council meetings. All submitted comments are thoroughly reviewed and considered. While these comments do not directly alter the Agency's accreditation decisions, their inclusion strengthens transparency and fosters open feedback mechanisms.

**4. Appeals Mechanisms.** Stakeholders dissatisfied with the Agency's decisions have the right to appeal, ensuring the fairness, validity, and legality of those decisions. In 2024, NAQA established an independent Appeals Chamber to address concerns regarding impartiality, replacing the previous commission that included members involved in the original decision. Key features of the chamber include:

- *Composition.* Independent members with no ties to decision-making bodies operate under clearly defined procedures, minimizing risks of undue influence;
- *Conflict avoidance.* Members are recused in cases of real or potential conflicts of interest, ensuring unbiased decision-making;
- *Timely processing.* Appeals are reviewed and resolved within 30 calendar days under strict submission guidelines, ensuring timely outcomes;
- *Reasoned Decisions.* The chamber issues detailed decisions that reference evidence and legislative provisions, reinforcing transparency and accountability.

Stakeholders may also appeal to courts, providing an additional layer of justice. Importantly, no other body or HEI has the authority to overturn or amend the Agency's decisions.

**5. Transparency and Public Accessibility.** Accreditation outcomes, evaluation criteria, and agency decisions are made publicly accessible. All relevant documentation, including self-assessment reports, expert group reports, sectoral council conclusions, comments, and Agency decisions, is available through the Agency's Information and Communication System (ICS).

NAQA Board meetings are broadcasted online on NAQA's official YouTube channel, enabling public oversight and fostering trust in the Agency's operations.

All participants in external quality assurance processes operate independently, ensuring assessments remain free from external influence and maintain objectivity.

Thus, NAQA ensures compliance with ESG 3.3 through clearly defined organizational, operational, and decision-making independence, which are legislatively enshrined and implemented via transparent procedures, engagement of independent experts, international partnerships, and robust appeal mechanisms. These measures collectively guarantee that the Agency's activities remain autonomous, objective.

#### **ESG Standard 3.4 Thematic Analysis**

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

#### **Data Collection and Analysis**

**Information Sources.** NAQA utilizes various information sources to analyze the quality of educational activities, ensuring comprehensive and reliable assessments:

- Materials from accreditation cases: includes self-assessment reports prepared by HEIs, HEI documents related to quality assurance and implementation of study programmes, expert panel reports, SECs conclusions, HEI remarks, and NAQA Board decisions;
- Data from electronic databases (e.g. USEDE);
- Feedback from external stakeholders: inputs from students, employers, public and professional associations, and government bodies are collected through surveys, questionnaires, and discussions during events;



- Open statistics and reports: includes data on HEIs from published reports and studies by other organizations (e.g. results of the Unified State Qualification Exam, employment outcomes of graduates, international rankings, scientific productivity indicators).
- Independent thematic evaluations: NAQA conducts independent research on current issues in higher education quality assurance, either independently or in collaboration with partners at the national level.

For each type of source, specific criteria are established to ensure the selection and reliability of the information utilized.

**Analysis of Accreditation Expertise Results.** NAQA conducts a systematic analysis of accreditation case results, ensuring data integrity and comprehensive insights. During the accreditation process, data is collected, categorized, and structured. The reliability of information sources is assessed as part of the review process. Before analysis, all data undergoes thorough checks for completeness and accuracy to maintain high standards of reliability. The Accreditation Information and Communication System is used for data storage. Data processing is, currently, carried out using Excel, with future integration of advanced tools like SPSS or Statistica under consideration.

Based on accreditation results, NAQA conducts the following analyses:

1. *Dynamics of accredited programmes.* Examination of trends in the number of accredited study programmes in Ukraine, including their distribution by education levels, fields of study, and the volume of accreditation applications received.
2. *Accreditation decisions by foreign agencies.* Analysis of accreditation decisions made by foreign quality assurance agencies, categorized by higher education levels.
3. *Transnational quality assurance practices.* Identification of positive practices and challenges in transnational quality assurance.
4. *Changes in compliance levels.* Detailed analysis of compliance level dynamics across various stages of the accreditation process, including expert group reports, sectoral expert council conclusions, and final NAQA decisions. This includes investigating the causes of any discrepancies or adjustments made during the process.
5. *Conditional accreditation trends.* Assessment of the outcomes of conditional accreditation for study programmes, particularly for those that have previously received such status, to evaluate their progress and the effectiveness of recommendations.

**The analysis of data from the USEDE and Open Statistics.** NAQA conducts a comprehensive analysis of data from the Unified State Electronic Database on Education and publicly available HEI statistics from reports by other organizations. This analysis includes:

1. *Number and types of HEIs.* Examining the distribution of HEIs implementing higher education programmes by levels, forms of ownership (state, private, municipal), categories, regional distribution, and the concentration of HEIs in specific cities and regions;
2. *Student distribution.* Analyzing the distribution of students by:
  - specialties and levels, particularly across HEIs of different ownership forms;
  - education levels and funding sources (e.g., state budget, contracts, other sources);
  - regional representation of students.



3. *Admission data.* Reviewing the number of applications and entrants during admission campaigns, categorized by levels of higher education.
4. *Staff Composition.* Evaluating the composition of academic staff, including gender distribution and the presence of academic degrees and titles.
5. *Study Programmes Distribution.* Assessing the distribution of study programmes by levels of higher education and analyzing the number and proportion of accredited programmes, with a breakdown by fields of study and education levels.

The analysis of statistical data from the USEDE serves as a supplementary information source and a verification tool. This analysis holds independent significance, as no other organizations have conducted such a comprehensive review as of December 2024. For instance, in January 2024, it was determined that only 21.31% of study programmes had been accredited through the full procedure since NAQA began its operations in 2019.

Other analytical studies conducted by NAQA:

1. Comparative Study "Independent Institutions of Higher Education Quality Assessment": focusing on the experience of accreditation agencies in various countries with successful traditions and established practices (e.g., the UK, USA, Canada, Australia, European Union countries, Asia).
2. Comparative Study "Models, Approaches, and Mechanisms for Implementing Initial Accreditation at Institutional and Programme Levels in Different Countries of the European Higher Education Area" (2024), which explored foreign experiences in implementing initial accreditation at institutional and programme levels.
3. Analytical Brief summarizing current practices of conducting the national qualification exam and developing proposals and recommendations for improving its content, structure, and procedures, and their application in accreditation procedures, which will enhance the transparency and efficiency of the exam processes and strengthen trust in the quality of education provided by Ukrainian HEIs.
4. "The Quality Assurance System for Professional Pre-Higher and Higher Education During Martial Law": a joint survey with the State Service for Education Quality of Ukraine on changes in the quality assurance system under martial law, evaluation of the educational process in educational institutions during the war, and responses to the security situation.
5. "Universities Under Siege: Challenges for the Ukrainian Higher Education System After Russia's Full-Scale Invasion of Ukraine": a joint survey with the School for Policy Analysis of Kyiv-Mohyla Academy National University, assessing changes in the quality of educational services since the start of the full-scale war.

These studies play an important role in strategic planning and policy development in the field of education. Comparative Studies 1)-2) provide insights into international practices and models, enabling the adaptation and improvement of external quality assurance mechanisms in Ukrainian higher education. The findings from studies 1)-2) were used to develop proposals for a model of external quality assurance. Study 3) was conducted at the request of the Committee on Education, Science, and Innovation of the Verkhovna Rada of Ukraine. The results were presented at a Committee meeting and considered in its decision to improve the model for conducting the Unified State Qualification Exam.

Joint surveys 4)-5) allowed for an examination of the specific challenges HEIs faced under martial law. These studies facilitated the development of well-founded proposals for organizing accreditation procedures during wartime and provided concrete recommendations for educational institutions to support the quality of education.

NAQA conducts analyses to evaluate the effectiveness and impact of external quality assurance.

The key sources of data for these analyses include:

- *feedback from participants*: surveys of representatives from HEIs and experts, conducted via Google Forms, to gather insights into the accreditation process;
- *event-based discussions*: contributions and feedback collected during roundtables, forums, and conferences, where stakeholders share experiences and observations;
- *personal interviews*: detailed feedback obtained through one-on-one interviews with individual representatives, such as employers or industry experts, to gain deeper insights;
- *comparison of implementation results*: analyzing how HEIs have implemented recommendations issued during conditional accreditations and assessing the outcomes of post-accreditation monitoring;
- *institutional changes*: evaluating shifts in internal processes and policies at HEIs following accreditations, to measure the broader impact on institutional quality assurance.

While these efforts provide valuable insights, the Agency acknowledges the need to diversify data sources and establish consistent and systematic cycles for conducting these studies. These measures aim to enhance the depth and reliability of impact assessments.

**Thematic analysis using a new evaluation tool – the "List of Major Drawbacks.** In August 2024, the Agency introduced a new evaluation tool – the "List of Major Drawbacks. The primary purpose of this tool is to ensure objectivity when determining compliance levels based on the Criteria for Quality Assessment of the Study Programme and to establish a unified approach to assessing the quality of study programmes. Additionally, the List plays a critical role in analyzing the quality of educational activities. The List not only streamlines the accreditation process but also facilitates in-depth thematic analysis, allowing the Agency to identify trends, address systemic issues, and develop evidence-based strategies for continuous improvement in higher education.

A major drawback refers to a drawback that constitutes a violation of current legislation, negatively impacts the formation of competencies for students, or prevents or significantly complicates the provision of educational services. A drawback is considered fundamental if it is systemic, affects all or most components of the study programme, and requires substantial, comprehensive changes or strategic measures. These measures may include radical revisions to the programme's structure, content, or organization, as well as a comprehensive review of policies and quality assurance procedures.

The "List of Major Drawbacks" consists of 10 parts, mirroring the structure of the Criteria for Quality Assessment of the Study Programme. Following the evaluation process, expert panels and SEC complete Annex 1 of the report. This annex includes a table indicating whether each drawback from the List was identified. In their reports, expert panel and SEC provide detailed explanations (sufficient and convincing arguments) to justify their conclusions regarding the presence or absence of each drawback.

While the List is comprehensive, it is not exhaustive. Expert panel and SEC may identify additional significant drawbacks not included in the List.

The "List of Major Drawbacks" was developed based on the Criteria for Quality Assessment of the Study Programme, the ESG 2015, legislative requirements, and an analysis of accreditation expertise conducted by NAQA from 2019 to July 2024.

NAQA is currently analyzing the results of expertise conducted between August and December 2024 with the help of the "List of Major Drawbacks." This analysis aims to uncover systemic issues, identify trends, and support targeted improvements across the higher education sector.

The key components of the analysis include:

Frequency Analysis of Drawbacks	Identifies the most common major drawbacks, highlighting priority areas for intervention
Field-Specific Distribution	Examines drawbacks by academic fields (specialties), identifying issues specific to certain industries or disciplines
Institutional Analysis	Analyzes drawbacks at the level of individual HEI to uncover institutional problems and guide targeted support efforts
Regional Comparison	Compares the frequency of drawbacks across regions to determine if specific geographic areas require special measures for improvement.
Intra-Regional Institutional Comparison	Compares drawbacks among HEIs within the same region to identify unique institutional challenges
Analysis by HEI Type and Ownership	Evaluates differences in drawbacks across HEIs of various types (e.g., state, private, municipal) and forms of ownership, enabling tailored recommendations and interventions

This dynamic, interconnected, and qualitative analysis enables the Agency to identify trends and patterns, determine causes and make forecasts, evaluate the impact of recommendations. By leveraging this tool and analytical approach, NAQA aims to support evidence-based policy development, improve institutional practices, and enhance the overall quality of higher education in Ukraine.

The implementation of the "List of Major Drawbacks" will enable the identification of potentially problematic issues that could serve as the foundation for a separate thematic analysis at the national level. These research initiatives are aligned with the National Action Plan for Quality Assurance of Higher Education in Ukraine for the period 2024–2026 and aim to address systemic challenges and promote continuous improvement in higher education.

**Development of a Four-Level Analytical Model.** NAQA is advancing its analytical methodology by developing a four-level model: "data" — "methods" — "tools" — "conclusions." This model aims to enhance the consistency, transparency, and reliability of the Agency's analytical activities. It involves defining categories of data used in analytical activities, developing appropriate methods and tools for each data category, establishing criteria for formulating substantiated and reliable conclusions.

Key features of the model:

1. *Clear definition of analytical stages.* Each stage of the analytical process is clearly outlined, ensuring a structured approach to data collection, processing, and analysis.
2. *Transparency in the Analytical Process.* By documenting each step, from data collection to conclusions formulation, the model enhances transparency, making the process and results easier to understand for all stakeholders.
3. *Adaptability to Different Analyses.* The model's clear categorization of data, methods, and tools allows for flexibility in adapting to various types of analyses, tailored to the specifics of the issue being studied.

4. *Accurate and Substantiated Conclusions.* The use of appropriate methods and tools for each data category ensures that conclusions are precise and well-supported by evidence.
5. *Standardization of Analytical Approaches.* A standardized approach facilitates the production of consistent results, regardless of the individuals or teams conducting the analysis.
6. *Continuous Evaluation and Adjustment.* Criteria for conclusions formulation enable ongoing evaluation of the effectiveness of methods and tools. This ensures timely adjustments to improve accuracy and reliability.
7. *Enhanced Stakeholder Trust.* A well-documented process provides clear justifications for each stage and tool used, building trust in the results and their application.

### Utilization of Analysis Results

The results of analysis are actively used to support a range of initiatives aimed at improving higher education quality and ensuring compliance with national and international standards.

NAQA leverages analytical results to:

- *Develop proposals for legislative amendments and draft regulatory documents to strengthen the legal framework for higher education at the national level.*
- *Provide data-driven proposals and insights to international bodies, addressing challenges.* For example, an analysis of accreditations conducted by foreign agencies that are members of ENQA revealed cases of accreditations granted without a site visit and for study programmes with no enrolled students, violating Ukrainian legislation. These findings were reported to ENQA management, discussed at the annual ENQA events.
- *Refine Accreditation Procedures.* For example, an analysis of NAQA decisions on accreditations conducted through full and simplified procedures identified significant differences in certain fields. This indicated a need to refine the criteria for granting permissions for simplified accreditation procedures. As a result, changes were introduced to the "Temporary Order of Accreditation of Study Programmes for Higher Education Seekers under Martial Law".
- *Enhance Study Programme Quality.* In December 2024, NAQA published "Clarifications on the Application of the Criteria for Quality Assessment of the Study Programme". This document provides current recommendations for evaluating the quality of study programmes under external quality assurance procedures, descriptions of requirements for study programmes and activities, guidelines for internal quality assurance systems, references to Ukrainian legislation and international quality assurance recommendations, recommendations for justifying the presence of drawbacks from the "List of Major Drawbacks". These clarifications aim to promote balance, transparency, and objectivity in evaluations.

HEIs use the results of the analysis to improve their operations, address challenges, and enhance educational quality. Key applications include:

- Identifying and correcting drawbacks;
- Integrating innovative approaches and effective practices observed in other HEIs to improve their own processes and outcomes;
- Adjusting study programmes to better align with labor market demands and address social challenges, such as inclusivity and the professional development of faculty;

- Developing internal quality assurance systems (refining internal policies and procedures, enhancing feedback mechanisms);
- Assessing impact on the quality of education and institutional performance;
- Strategic planning (leveraging sectoral and higher education-level analysis to identify systemic issues, anticipate potential risks, and develop strategies to prevent similar drawbacks within the institution).

NAQA ensures an open feedback loop with HEIs regarding the implementation of recommendations from analytical activities through meetings with HEI representatives, surveys, post-accreditation monitoring, and analysis of institutional drawbacks correction during the next period of expertise.

### Dissemination of Analysis Results

NAQA implements a comprehensive policy for disseminating the results of its analytical activities. This policy ensures broad accessibility and engagement with stakeholders through the publication of reports, use of social media, NAQA projects, and active participation in presentations and discussions at various events.

**Publication of Analytical Reports and Accessibility to Stakeholders.** NAQA publishes:

- *Annual Report*, which primary outcomes of the Agency's work for the year, covering international initiatives, internal processes, and legislative changes initiated by the Agency in the field of higher education quality, highlights achievements, challenges, problems, and recommendations for further improvement;
- *Report on the Quality of Higher Education in Ukraine*, providing an in-depth analysis of the current state of higher education in Ukraine, including identified issues, drawbacks, or opportunities for improvement, positive and negative trends, factors affecting the quality of higher education at the national level (also identified through accreditation results), analysis of the agency's activities against international standards, and recommendations for improving national education policy based on the analysis of existing challenges, drawbacks, or opportunities for improving education quality, forecasts, and future plans for the development and improvement of processes in the field of higher education quality assurance at institutional, national, and international levels;
- *Other analytical documents* focusing on specific topics to provide detailed recommendations or to draw attention to significant issues that require resolution.

### Frequency of Publications

- *Annual Reports* are published once a year to summarize the activities for the previous year;
- *Reports on the Quality of Higher Education* are published annually based on the analysis of the state of higher education for the previous year;
- *Other analytical documents* are published as needed, depending on changes in educational policy or priorities that require separate analysis.

**Dissemination Channels.** NAQA ensures that all stakeholders have access to reliable and objective analytical information on higher education quality assurance through various dissemination channels in particular on the official website, social media platforms, during events, in the framework of projects, during the annual reporting to the Committee on Education, Science, and Innovation of the Verkhovna Rada (Parliament) of Ukraine and via direct communication with stakeholders.

Thus, NAQA regularly and systematically integrates the results of analysis into practice and ensures their effective dissemination. At the beginning of 2024, following monitoring results, NAQA identified the need to



expand its analytical work to substantiate effective management decisions, develop strategies, forecasts, and improve policies in the field of quality assurance of education. To address these needs, a separate Analytics and Training Support Department was established, tasked with these responsibilities. The department's outcomes demonstrate the effectiveness of this decision. In 2024, the implementation of the "List of Major Drawbacks" enabled structured system analysis (both from accreditation expertise and individual thematic studies), allowing the identification of changes, trends, issues, and best practices at the national level, and improving policies and procedures in the field of quality assurance of education at institutional, national, and international levels, meeting the requirements of standard 3.4. To strengthen the effectiveness of external quality assurance, NAQA aims to expand its research on the effectiveness and impact of external expertise of study programmes.

### **ESG Standard 3.5: Resources**

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

#### **Human Resources**

**Number of staff and their professional level.** NAQA is a permanent collegial body consisting of 23 members. Members are appointed by the Cabinet of Ministers of Ukraine based on the decision of the Competitive Commission for the selection of members of NAQA. This competitive selection process ensures that members are professionals with relevant knowledge and experience in higher education and management. Currently, the Agency operates with a provisional composition of 21 members, as per the Cabinet of Ministers Order No. 1586-r dated December 2, 2021, titled "On Approval of the Provisional Composition of NAQA for Higher Education Quality Assurance".

**NAQA Leadership.** NAQA activities are managed by its Head and Vice Heads who are appointed and dismissed by the Cabinet of Ministers of Ukraine upon the submission of NAQA, elected at the first meeting of NAQA for a term of three years and operate on a permanent basis to ensure consistent and effective leadership.

Organizational, financial, material, informational, and other support for the NAQA activities is provided by NAQA Secretariat. The Head of NAQA Secretariat is appointed to the position by NAQA Head based on the NAQA decision for a term of five years with the possibility of reappointment. NAQA by a two-thirds vote of its approved composition may decide to dismiss the Head of NAQA Secretariat in accordance with labor laws. The Head of NAQA Secretariat is accountable and controlled by NAQA. Vice Heads of NAQA Secretariat are appointed to and dismissed from the position by the Head of Secretariat with the agreement of NAQA.

The organizational structure of NAQA is outlined in Annex B. Functions and tasks are clearly distributed, ensuring that all necessary functions of the Agency are performed without duplication. Collaboration between the units of Secretariat occurs within issues requiring their joint involvement, accreditation processes, or the development of normative acts. Each unit's duties are outlined in the regulations, preventing overlap and ensuring clarity in roles. Activities are coordinated by the leadership of the Secretariat and NAQA, ensuring alignment across units and seamless execution of tasks. Structural units efficiently perform their assigned functions, avoiding duplication of effort, the Agency's tasks are implemented comprehensively, ensuring smooth operations and effective collaboration among all units.

Decision-making within the NAQA follows a clearly regulated process to ensure efficiency, accountability, and transparency. The process includes the following stages:



- *proposal preparation*: departments prepare analytical materials, draft normative documents, or recommendations regarding issues that require resolution.
- *discussion and coordination*: materials are reviewed at the levels of internal working groups, the Secretariat's management, and NAQA to ensure alignment and thorough consideration.
- *decision approval*: decisions are made during NAQA Board meetings or by authorized individuals; voting or consensus-building procedures are documented in official protocols.
- *implementation*: approved decisions are executed by the relevant departments, ensuring clarity in roles and responsibilities.

**Mechanisms for the operational redistribution of duties** are implemented through:

- redistribution of functions among departments (amendments to regulations or staffing tables).
- coordination at the management level (temporary assignment of new functions to certain departments or the creation of working groups with representatives from different departments).
- utilization of shared information resources facilitates rapid involvement of departments in joint projects.

Thus, thanks to the concerted efforts of NAQA Head and Vice Heads, effective management is achieved, focusing on developing the higher education system in Ukraine, strengthening academic integrity as a cornerstone of quality assurance, integrating Ukraine into the international educational space, fostering global collaboration and standards alignment. Additionally, the Head of Secretariat ensures the smooth operation of 15 structural units, maintaining coordination and efficiency across the Agency's activities. All processes at NAQA are guided by the principles of accountability, transparency, and public trust. This approach reinforces NAQA's commitment to advancing quality assurance and supporting the continuous improvement of higher education in Ukraine.

**Regular analysis of structural efficiency.** The efficiency of the NAQA Secretariat's structure is systematically evaluated and adjusted to address new challenges, legislative requirements, and strategic objectives. This ongoing evaluation is reflected in periodic changes to the Agency's organizational structure. The following key indicators are considered when assessing the Secretariat's efficiency: activity results (adherence to deadlines, quality of prepared documents and analytical materials, number of implemented projects), duty distribution (optimization of employee workload and prevention of function duplication), feedback (consultations with secretariat employees, agency performance assessments by stakeholders: higher education institutions, experts), and resource evaluation (analysis of staffing, budget planning, financial resource utilization, and expense justification). Based on the analysis, the structure and functions of the departments are adjusted, and measures to enhance the efficiency of departments and improve procedures are implemented. An example of effective structural adjustment is the creation of the Analytics and Training Support Department in June 2024, which focuses on organizing the Agency's information-analytical support, monitoring higher education statistics, developing training materials, and conducting training sessions. This adjustment has resulted in enhanced focus on key tasks, reducing the risk of errors, resource optimization, and ensuring better control and flexibility.

Through regular evaluation and proactive structural adjustments, NAQA ensures that its Secretariat remains responsive, efficient, and aligned with its mission to enhance higher education quality.

**NAQA Secretariat: Staffing and Requirements.** As per Cabinet of Ministers Resolution No. 376 dated 2 April 2024, the maximum number of employees at the NAQA Secretariat is 92, with 67 positions funded through the general fund. As of January 2025, NAQA employs 59 people, including 43 women and 16 men. The structural unit includes a head and specialists, depending on the level of education and qualifications,

positions of a leading specialist or specialist of a certain category are available. General requirements for all positions: higher education, mandatory knowledge of Ukrainian legislation regulating higher education and quality assurance, familiarity with normative legal documents and internal NAQA regulations, proficiency in Ukrainian, skills in working with PCs, office equipment, and modern management methods.

**NAQA Staff Selection Process.** NAQA independently hires candidates to meet its current requirements and objectives. The selection process is governed by the Staff Selection Procedure, approved by the order of the Head of the Secretariat dated 1 December 2023, No. 56. The process adheres to the principles of equality, openness, transparency, complies with current Ukrainian legislation and NAQA's internal normative documents. Applicants are assessed based on the experience, education, specific skills, and possessing the necessary business, professional, and personal qualities.

The staff selection process at NAQA is a structured, multi-stage procedure designed to ensure the recruitment of highly qualified and competent candidates:

*Stage 1: Vacancy announcements and application submission.*

*Stage 2: Competitive Selection Process.* The competitive selection consists of: a preliminary interview; testing on knowledge of legislation or performing a practical task.

The staff selection process at NAQA is designed to promote fairness, objectivity, and effectiveness, ensuring the recruitment of qualified and competent employees to the Secretariat. This is ensured by: comprehensive candidate assessment; holistic evaluation approach; commitment to equality and transparency; adaptability to position requirements; validation through prior experience or recommendations; compliance with legislation and standards.

This transparent and merit-based selection process ensures that NAQA hires candidates who align with its mission and values, contributing effectively to the Agency's goals in quality assurance for higher education.

**Training and Professional Development of Secretariat Staff.** The professional development of NAQA's Secretariat staff focuses on fostering continuous learning and skill enhancement through a variety of educational and training opportunities. Key professional development opportunities: ongoing self-education (staff are encouraged to engage in continuous self-education to enhance their knowledge and skills), participation in training programmes (employees can participate in courses, webinars, and lectures on platforms such as Prometheus; opportunities to attend conferences further expand professional knowledge and networking). Training topics in 2023 addressed critical areas for professional growth, including anti-corruption awareness, artificial intelligence and technology, education in emergencies, public management and procurement, international cooperation, digital skills and media literacy, psychology and communication, and educational management. Secretariat staff also participated in international internships, including in the Staff Mobility Week programme at UKÄ and HAKA as part of IMINQA in October 2023, in October 2023 and in trainings under the SEQA-ESG 2 project in 2024. These activities:

- foster the development of key competencies, essential for the Secretariat's operations;
- enhance professional expertise of the staff, ensuring their ability to address complex and evolving challenges,
- integrate international experience into the agency's practices, aligning operations with global standards and best practices.

This comprehensive approach to training and development ensures that NAQA's Secretariat staff remain well-equipped to support the Agency's mission of advancing higher education quality assurance in Ukraine.

**Staffing Challenges.** The Agency encounters challenges in building and maintaining its personnel structure: high standards (candidate requirements not only encompass appropriate qualifications but also extensive knowledge, advanced professional skills, and experience in the field of educational quality assurance), competition for talent (the private sector and international organisations often offer more attractive working conditions and higher salaries, especially in fields like international cooperation, IT, and analytics), and a limited market of qualified personnel (Finding professionals with the necessary combination of knowledge, skills, and experience in educational quality assurance remains a significant challenge). To address these challenges, NAQA offers professional development opportunities (access to training programmes, courses, and international internships to enhance skills and career growth), flexible working conditions, and a supportive work environment (a corporate culture that values initiative and innovation, teamwork and collaboration, creative problem-solving). While meeting NAQA's high standards requires effort, it also presents a unique opportunity for motivated individuals to contribute to shaping the quality of higher education in Ukraine, be part of a dynamic and impactful team driving improvements in the field. By fostering a balance between high standards and supportive practices, NAQA continues to build a team that is both competent and committed to its mission.

**Dynamics of Staff Composition Changes.** The overall number of staff remains roughly stable, with possible redistribution among structural units. In 2023, 15 employees were dismissed and 14 were hired. The staff turnover rate for 2023 was 23%. In 2024 (as of 15 November 2024), 13 employees were dismissed and 18 were hired. The staff turnover rate is 20%. The main reasons for dismissals were predominantly mutual agreement (relocation due to personal or family circumstances, changes in career priorities leading to new opportunities), with 5 cases due to the expiration of fixed-term contracts. An analysis of the reasons for dismissals shows that competition in the labour market significantly impacts the outflow of specialists to the private sector or international organisations. The turnover rate is manageable, with suitable replacements promptly hired, no significant changes in the qualification composition of staff, although adaptation periods are required for new employees to fully integrate. As of 1 January 2025, structural adjustments were made to further optimize and enhance operational efficiency: establishment of an IT Department and the redistribution of records management and material & technical support. The goal of these changes is to optimise and enhance the efficiency of the structure.

**Accreditation Programme Experts.** Experts on study programme accreditation are appointed to the expert group based on the Order of Appointment. The process for selecting experts to be included in the Expert Registry and the competitive selection of members for the Sectoral Expert Councils (SECs) is described in detail in section on compliance with Standard 2.4. The Agency ensures the continuous training and professional development of experts to maintain high standards in external quality assurance activities. To identify the needs of experts and SEC members, the following methods are utilized: surveys targeting experts and members to gather feedback, seminars and briefings that facilitate direct communication and exchange of ideas. The evaluation of expert's proficiency is described in the section on compliance with Standard 3.6.

Thus, NAQA maintains a highly professional staff capable of effectively conducting external quality assurance of higher education. By ensuring systematic training, development, and support for its experts, NAQA fully complies with the requirements of ESG standard 3.5 for human resources.

### **Financial Resources**

NAQA maintains robust and sustainable financial resources essential for its efficient operation. These resources bolster the Agency's ability to conduct external quality assurance activities, enhance internal processes, undertake analytical reviews, and engage in effective public communication regarding its operations.

**Sources of Funding** The primary funding for the Agency derives from state budget allocations from both general and special funds, as well as charitable contributions. The special fund is replenished through fees

collected from accreditation services, which are charged regardless of the decision made, ensuring financial independence. Charitable contributions included the information-communication system "Accreditation" handed over to the agency, a grant of 39,000 USD from the American Councils directly transferred to the developers, and the "New Justice" programme which provided NAQA with organizational and computer equipment valued at 14,065 USD, currently on temporary loan. The British Council, the International Educational Policy Research Fund, and the Institute for Educational Development have sponsored a series of training sessions and seminars, enhancing staff capabilities and institutional knowledge.

**Funding Stability.** The Agency's financial support has demonstrated stability funding over recent years, with no delays or cuts, except for a temporary reduction in state allocations in 2022 due to martial law. Despite this challenge, the agency effectively optimized its expenditures to maintain the continuity of its core functions. Financial planning on an annual basis further reinforces this stability, providing predictability in operational funding. During the period of reduced funding, the agency displayed remarkable adaptability by recalibrating its budgetary practices without compromising the quality and scope of its essential services.

**Alignment with Current Needs.** The current funding model adequately supports the Agency's primary operations and facilitates the execution of all core functions. This alignment ensures that the agency continues to meet its operational objectives effectively. Despite the general adequacy of funds, there is a recognized need for additional investment in technological advancements. Specifically, the agency seeks to modernize and upgrade its information systems. This includes updating the formats of reporting documents and integrating new modules for post-accreditation monitoring and institutional accreditation to enhance overall service efficiency and responsiveness.

**Analysis of Funding Dynamics** Over the last few years, the agency has observed a consistent increase in funding levels. This growth is primarily attributable to two factors: increased allocations from the general fund (enhancements in base financial indicators such as salary scales have led to higher budget receipts) and rise in special fund revenues (there has been a notable increase in revenues from accreditation service fees, which have been adjusted in response to changes in both budgetary indicators and policy frameworks). Previously, the calculation of accreditation service fees was tied to the official salary scale of a professor according to the tariff grid, but from August 2024, the benchmark is the subsistence minimum for able-bodied persons (accreditation of one study programme – 29 subsistence minimums, simultaneous two – 38 subsistence minimums, simultaneous three – 50 subsistence minimums). Moving to a calculation based on the subsistence minimum ensures greater stability.

**Utilization of Financial Resources.** The agency's financial resources are managed in strict accordance with Ukrainian budget legislation, ensuring full compliance with legal standards. Planning for expenditures is based on data from previous years, which allows for optimized allocation and effective utilization of resources. This approach facilitates precise budget forecasting and enhances financial decision-making. Expenditures are strategically categorized to ensure operational efficiency and fulfillment of the agency's mission. The primary categories of expenses are: salaries (funded through the general budget, salaries form the foundation of the Agency's operational capacity), utility services, and payments to experts and SECs members from the special fund.

**Efficiency Control of Funds Usage.** To ensure financial transparency and accountability, the agency implements stringent controls over fund usage. Regular internal reviews assess the financial operations within the agency, aiming to improve efficiency and prevent any potential mismanagement. Conducted by the State Audit Service of Ukraine, these reviews are scheduled as part of an approved plan to ensure that all financial activities align with national standards and achieve intended outcomes. These control mechanisms are vital for maintaining the integrity of financial operations and for instilling confidence among stakeholders regarding the prudent and effective use of resources.

**Other Sources of Funding, Grant Funds.** In addition to state allocations, the agency actively seeks grant funds to supplement its financial resources. While direct international support for the agency's main operations has not been actively pursued, the use of grant funds is strategically targeted towards specific, project-based objectives. Grant resources are meticulously directed towards defined objectives within the scope of respective projects such as mobility support and task execution by working groups within project goals. These grant funds come with precise financial limits and are earmarked exclusively for their intended purposes. Importantly, the core financial stability of the agency is not dependent on these funds. Even if grant funding were to cease, it would not impact critical operational aspects such as: salaries, basic expenses, or funding for accreditation expertise, which are fully covered by state funding. These areas remain robustly funded by state resources, ensuring no disruption to the Agency's essential functions. Grant projects are not just additional funding sources but strategic tools that enhance the Agency's capabilities. They allow the agency to explore innovative approaches and expand international cooperation. This approach ensures that while grant projects provide valuable resources and opportunities for growth, they do not create dependencies that could affect the agency's ability to perform its core functions.

**Transparency of Financial Activities.** The Agency is committed to the highest standards of transparency in its financial activities. This commitment is demonstrated through comprehensive and timely reporting of fund usage. The Agency regularly updates its financial reports and publishes them on its official website. This ensures that all stakeholders have immediate access to detailed information on how funds are being allocated and used. Additionally, financial activities are disclosed on the E-data portal (<https://spending.gov.ua/new/en>), Ukraine's official open data resource for tracking the use of budget funds. This platform provides a transparent view of all governmental financial transactions, allowing for public scrutiny and accountability. All financial reports are freely accessible to stakeholders, enabling them to review financial data. This open access fosters a culture of trust and accountability, ensuring that stakeholders can directly observe and assess the financial integrity and efficacy of the agency.

**Self-Assessment Report 2020 Identified Issues in Forming NAQA's Financial Resources, Notably:**

- 1) Financing of NAQA via the Ministry of Education and Science of Ukraine, which makes full financial autonomy impossible.
- 2) State budget funds for financing NAQA are not protected from sequestration. In 2020, 100% of the funds planned for the creation of the Information System were sequestered and, as of today, this Information System is being developed exclusively for grant funds. Allocation of NAQA's own revenues (accreditation fees, grants) to the revenues of the State Budget of Ukraine into the accounts of the State Treasury, significantly limiting the ability to promptly manage such revenues. For example, timely settlements with experts, members of sectoral expert councils, and other contractors.
- 3) Crediting of NAQA's own revenues (accreditation fee, grants) to the revenues of the State Budget of Ukraine and the accounts of the State Treasury, which significantly limits the ability to quickly dispose of such revenues - e.g., timely settlements with experts, members of sectoral expert councils and other contractors.
- 4) There is no mechanism for compensation to HEIs from the state budget expenditures for accreditation of study programmes. Payments by state HEIs for the accreditation of study programmes requires formal implementation of a certain procurement procedure in accordance with the Ukrainian legislation on public procurement. Such purely formal procedure requires the involvement of additional resources from the HEIs and NAQA and often leads to delays in payment for these services. It results in a short-term lack of funds for the timely fulfilment of NAQA's financial obligations, including to persons involved in accreditation procedures.

Regarding points 1)-3), these approaches do not contradict the financial independence of the agency. As stated above, funding is provided under a separate budget programme. Funds for conducting accreditation



procedures are credited to the special fund of the state budget as the own revenue of a budgetary institution, taking into account the requirements of the Budget Code of Ukraine, into an account of NAQA opened at the territorial body of the Treasury. Considering that the Agency's basic needs (employee salaries, utility services) are financed from the general fund, and funds from the special fund go mainly to payments to experts and SEC members, the amount of accreditation procedures does not affect the salaries of agency employees, thus not influencing decisions. Nor does it affect the payment size for HEIs.

To address issue 4, changes to the payment procedure for accreditation services were proposed in 2024, allowing HEIs to pay for accreditation expertise from the general fund. This adjustment aims to streamline the payment process, minimizing delays and simplifying administrative procedures for HEIs.

Thus, the agency demonstrates adherence to the ESG 3.5 standard by maintaining stable and sufficient financial resources. Transparency, responsible planning, and control ensure proper resource utilization, contributing to the agency's mission fulfillment. Further development requires additional funding for the modernization of information systems.

To continue its trajectory of growth and enhance operational efficiency, the agency identifies need for additional funds specifically earmarked for the modernization of information systems. This investment will support advanced data management and expand capabilities in handling accreditation processes and monitoring.

### **Material and Technical Provision**

**Office Premises.** The agency leases office space at the address: 1 Borysa Hrinchenka Street, Kyiv, Ukraine, 01001. Currently, the office area provides sufficient conditions for fulfilling the agency's tasks, including accommodating all employees necessary for its functions. The existing workspaces are adequate for the current staff. However, due to the expected increase in the number of secretariat employees from 1 January 2025, the agency plans to arrange additional workspaces. For this purpose, the possibility of relocating to another premises that will meet the new needs is being considered.

**Technical Equipment.** The agency uses a wide range of technical equipment to support its activities. Desktop computers are used for office work, and laptops are used for mobile work, including during offsite events or remote work. Cloud servers are employed for data security and access, serving for backup, website hosting, and file sharing. The agency's network equipment includes routers and switches for creating a local network (LAN), and Wi-Fi access points for wireless connection. External hard drives and SSDs are used for data backup storage. The office is equipped with printers, scanners, and multifunctional devices. Audio and video equipment, including webcams, headsets, microphones, and broadcasting equipment, are used for conducting online meetings and conferences. Additionally, uninterruptible power supplies (UPS) are used to maintain equipment operation during power outages, security camera systems for security, and projectors for presentations. Overall, the technical equipment meets modern requirements; plans are underway to purchase laptops and update memory cards. The needs for equipment upgrades are analyzed annually, followed by planning, tendering, and procurement of necessary equipment. This approach enables the agency to effectively perform its tasks.

**Software and Process Automation.** NAQA actively utilizes modern software for analytical work, process organisation, and ensuring transparency of its activities. Core tools include Windows, Office 365, particularly Excel for analytical work, and the ASKOD system for organising internal processes.

A key achievement of the Agency has been the development of a unique Information and Communication System (ICS), which ensures transparency and openness of the accreditation process for study programmes. This system automates all accreditation stages, including document flow and information interaction between NAQA, educational institutions, experts, and sectoral expert councils. The system allows for the



exchange of information and documents in electronic format, ensuring data preservation and access based on user roles.

The client part of the system is implemented as a web application compatible with modern web browsers. This part's interfaces allow for user authentication, viewing and editing accreditation cases, accessing accreditation schedules, submitting reports, and working with qualified electronic signatures.

The server part handles data processing, interaction with a relational database, and information transmission via API. A crucial component of the system is ensuring transparency at all accreditation stages, made possible by the public interface. Through this interface, any interested party can check the status of a study programme's accreditation.

Plans are currently underway to update and expand the system, adding modules for "Post-Accreditation Monitoring" and "Institutional Accreditation."

In addition to the ICS, NAQA uses several other software solutions. The electronic system NAQA.Svr facilitates the publication of information about the formation of one-time specialised academic councils, the awarding of the degree of Doctor of Philosophy, and the cancellation of such decisions in accordance with current legislation. The LMS\_experts system will automate the management of expert databases, simplifying these processes; this system is currently under development and filling.

**Personal Data Protection.** Besides automating processes, NAQA pays attention to personal data protection, ensuring data security at all stages of processing and implementing technical and organisational measures to prevent loss, destruction, leakage, unlawful processing, or access. An Action Plan (Order No. 63 dated 20 December 2024) has been developed to respond to unauthorized access, equipment damage, or emergencies. In case of emergencies, agency staff must preserve data and prevent external access. Measures include automatic document saving on computers, storage of paper documents in fireproof cabinets with locks, and data placement on protected servers.

**State and Modernisation of the Material-Technical Base.** The material-technical base of NAQA generally meets current needs and provides adequate support for all key processes. An annual inventory of material resources is carried out within specified deadlines, with three inventories conducted in 2024, indicating a high level of control over the base's condition.

Recent years have seen active updates: hard drives have been purchased, communication capabilities enhanced (network switches, Wi-Fi equipment, etc.). These steps are dictated by the need for more powerful equipment and the increasing volume of information to be processed.

NAQA promptly responds to current challenges, allowing it to maintain a high level of resource provision and eliminating the need for strategic planning. The main reasons for updating the material-technical base are ageing and depreciation. In accordance with the Resolution of the Cabinet of Ministers of Ukraine dated 16 December 2020, No. 1266 "On Amendments to Resolutions of the Cabinet of Ministers of Ukraine dated 1 August 2013, N 631 and 11 October 2016, N 710", NAQA publishes justifications for the technical and quality characteristics of the procurement subject, budget allocation size, and expected cost of the procurement subject:

<https://naqa.gov.ua/%d0%bf%d1%83%d0%b1%d0%bb%d1%96%d1%87%d0%bd%d1%96-%d0%b7%d0%b0%d0%ba%d1%83%d0%bf%d1%96%d0%b2%d0%bb%d1%96/>. Information about the Agency's procurement plans and completed purchases can be found on the ProZorro web portal.

Modernisation is financed through grants and the special fund, ensuring stability in the process.

**Ensuring Continuous Operation.** NAQA effectively ensures the continuity of its activities by implementing contingency plans and demonstrating flexibility in responding to emergencies.

Funding for the secretariat's operations is provided through the general fund of the state budget, ensuring independence from the accreditation process and stability in operation.

In the event of a power outage, the agency applies well-established mechanisms to support uninterrupted operation: remote work for employees is organized; three uninterruptible power supplies are installed at key office points; the internet provider ensures stable network access even in the absence of electricity.

Information from the "Accreditation" system is stored on external resources, ensuring its reliable protection and accessibility. For this, the agency has a contract with a data custodian and regularly performs backup. The server in the office premises is used exclusively for the operation of the ASKOD document management system.

In emergency situations, NAQA demonstrates high flexibility and adaptability. In response to pandemic and military action challenges, innovative approaches were introduced: in 2020, for the first time globally, remote accreditations in an online format were initiated, as well as in a hybrid format; meetings of sectoral expert councils and NAQA are conducted online.

Secretariat employees ensure proper coordination of these processes, quickly adapting to changes. In cases of electricity outages or air raid alerts, measures are transferred without disruptions, ensuring stable operation.

Thanks to these measures, NAQA has managed to ensure the continuity of its activities even under the most challenging conditions, maintaining stability and high quality in performing its functions.

### **ESG Standard 3.6. Internal Quality Assurance and Professional Conduct**

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

NAQA rigorously enforces an internal quality assurance policy that aligns with the requirements of the ESG Standard 3.6. This policy underscores high professional standards, ethical conduct, transparency and accountability, and the continual improvement. The measures implemented under this policy are designed to maintain stakeholder trust, enhance process efficiency, and ensure compliance with international standards.

In its pursuit of these standards, NAQA is guided by several foundational documents that frame its operations and strategic direction: Charter, Mission and Strategy, Communication Strategy, NAQA Quality Assurance Policy, and Code of Academic Integrity. Recognizing the need to stay responsive to contemporary challenges, NAQA actively reviews and updates these strategic documents to reflect current needs and future goals. For instance, changes to the Charter were approved by the Cabinet of Ministers of Ukraine on January 23, 2024, and the Mission and Strategy, Communication Strategy were reviewed during the Strategic Session of NAQA in April 2024, NAQA Quality Assurance Policy were also updated and approved on NAQA Board meetin on December 2024.

NAQA Quality Assurance Policy is a pivotal document that regulates the essential aspects of the agency's quality assurance activities. The policy formation process involved NAQA Board members, Secretariat staff, and was compared with international practices. This ensured a comprehensive and balanced nature of the developed policy.

The main principles and objectives of the policy are based on the current legislation of Ukraine, international agreements and standards, the mission, values, and principles of internal organization laid out in the Strategy of NAQA up to 2026, and the principles and provisions of NAQA's Code of Academic Integrity.

### Main principles of NAQA's Quality Assurance activities:

1. **Resource provision and institutional capacity.** Sufficiency of resources: ensuring that NAQA has access to adequate resources, both human and financial, to effectively conduct quality assurance activities across higher education institutions).
2. **Transparency, accountability, and standard adherence.** Accountability: committing to responsibility in actions and decisions, maintaining high levels of transparency in reporting and operations; ESG compliance: aligning NAQA's activities with the ESG, reinforcing credibility and international standards
3. **Independence and ethical standards.** Independence: Upholding the autonomy of NAQA's operations to prevent external influence and bias; professional integrity: maintaining high professional standards and ethical integrity in all processes; conflict of interest avoidance: implementing stringent measures to prevent and manage conflicts of interest among all stakeholders.
4. **Security, inclusion, and non-discrimination.** Information security and accessibility: protecting the confidentiality and integrity of data while ensuring it is accessible to those who need it; anti-discrimination measures: actively preventing any forms of intolerance or discrimination within the quality assurance processes.
5. **Interaction and collaboration.** Government relations: facilitating effective interaction with government bodies to align educational quality assurance with national education policies and objectives.
6. **Development orientation and improvement.** Continuous improvement: regularly assessing experiences and outcomes to refine and enhance quality assurance activities; feedback mechanisms: establishing robust mechanisms for receiving and integrating feedback and reflection from various stakeholders to inform continuous development and adaptation.

In December 2024 (protocol No. 22 (72)), the Policy was updated to adapt to the new strategic goals of the agency, improve management, protect rights, and increase accountability. The main changes include:

1. An emphasis on personal data protection as part of the non-discrimination principle, ensuring compliance with ethical standards and legislation regarding the protection of personal rights and freedoms;
2. Specified descriptions regarding the annual publication of NAQA's activity report and the Higher Education Quality Report on the official website and sending to government bodies, higher education institutions, and scientific institutions. This norm, defined by the Law of Ukraine "On Higher Education," reaffirms existing practices that highlight transparency, accountability, and stakeholder information.
3. Added details on anti-corruption measures.
4. Implementation of the Appeals Chamber.

These amendments underscore the Agency's commitment to transparency, ethics, and enhanced anti-corruption measures, which contribute to increasing trust in its activities.

The operational framework for NAQA's Quality Assurance System is extensively outlined in the "Regulations on the Quality Assurance System of NAQA Activities". The quality system structure comprises three levels with defined processes. Strategic Level; Tactical Level; Operational Level.

## Ensuring Accountability to Stakeholders

The Agency is deeply committed to maintaining a high level of accountability to all its stakeholders. This commitment is manifested through various mechanisms and practices designed to ensure transparency, reliability, and responsiveness in all aspects of its operations.

**Regular Reporting.** NAQA annually prepares and publishes a Report on the Quality of Higher Education in Ukraine, its alignment with the objectives of sustainable and innovative societal development, and a Report on its own activities (<https://naqa.gov.ua/%d0%b7%d0%b2%d1%96%d1%82%d0%b8-%d1%96-%d1%81%d0%b0%d0%bc%d0%be%d0%be%d1%86%d1%96%d0%bd%d1%8e%d0%b2%d0%b0%d0%bd%d0%bd%d1%8f/>).

Reports on financial operations, procurement plans, and details of completed procurements are published on the official website. Annually, the agency's management presents a report to the Committee on Education, Science, and Innovation of the Verkhovna Rada of Ukraine. This session provides a platform for legislative oversight, allowing representatives to review and discuss the Agency's progress and challenges in enhancing educational quality.

**Transparency of Processes.** The agency is committed to ensuring transparency across all its operations by making critical information readily accessible to the public. This commitment to openness is implemented through comprehensive website content including strategic documents, organizational structure, the information regarding other important units, in particular Advisory Board and Appeals Chamber, meeting protocols, regulatory documents, and details of the agency's activities, including initiatives, projects, and collaborations. This ensures the public's ability to stay informed about the agency's activities and decisions. The agency maintains an active presence on official social media pages, where updates and activity highlights are regularly posted. This not only facilitates immediate communication but also engages a broader audience in a dynamic and interactive manner.

These transparency measures ensure that all stakeholders, from educational institutions and policymakers to students and the public, have the necessary information to understand, engage with, and evaluate the agency's efforts in improving higher education quality. By maintaining open access to such comprehensive information, the agency fosters a climate of trust and accountability.

**Ensuring Access to Public Information** NAQA facilitates access to public information, guided by the Laws of Ukraine "On Information," "On Access to Public Information," and the Resolution of the Cabinet of Ministers of Ukraine from 13.07.2011 No. 740 "On Approval of Maximum Expense Rates for Copying or Printing Documents Provided on Request for Information," and the Instruction on the procedure for ensuring access to public information at NAQA, approved by order No. 10 dated 22.05.2020, and by the order of NAQA from 28.02.2020 No. 3 "On Approval of the Cost Size for Copying or Printing Documents Provided on Request for Information and the Procedure for Reimbursing These Costs."

Information is provided within the set deadlines - no later than five working days from the date of request. Requests can be submitted in writing by sending them by post to Borysa Hrinchenka Street, 1, Kyiv 01001, or through the agency's mailbox, or in electronic form – to the email address [public@naqa.gov.ua](mailto:public@naqa.gov.ua). Information on the procedure for submitting requests and a report on the number of received and processed requests for access to public information is available on the agency's official website (<https://naqa.gov.ua/%d0%b4%d0%be%d1%81%d1%82%d1%83%d0%bf-%d0%b4%d0%be-%d0%bf%d1%83%d0%b1%d0%bb%d1%96%d1%87%d0%bd%d0%be%d1%97-%d1%96%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b0%d1%86%d1%96%d1%97/>), confirming the transparency of the process.

**Handling Citizen's Appeals.** Appeals can be submitted in writing by sending them by post to Borysa Hrinchenka Street, 1, Kyiv 01001, or through the agency's mailbox, or in electronic form – to the email address

[public@naqa.gov.ua](mailto:public@naqa.gov.ua). Information on the procedure for submitting appeals and a report on the number of received and processed appeals is available on the Agency's official website (<https://naqa.gov.ua/%d0%b7%d0%b2%d0%b5%d1%80%d0%bd%d0%b5%d0%bd%d1%8f-%d0%b3%d1%80%d0%be%d0%bc%d0%b0%d0%b4%d1%8f%d0%bd/>), confirming the transparency of the process.

NAQA ensures stakeholder engagement through internal and external feedback mechanisms, guaranteeing that the rights and interests of stakeholders are protected and that their participation in processes is not merely formal but has a real impact on decision-making. The effectiveness and compliance with norms are confirmed by the results of regular external audits of the Agency's activities.

**Assessment and Continuous Improvement of Agency Activities.** NAQA is dedicated to ongoing enhancement and rigorous assessment of its activities. This commitment to excellence is executed through several structured processes:

Distribution of Duties	Duties and responsibilities are clearly defined among members, staff of NAQA, structural units of the secretariat, committees, and sectoral expert councils. This ensures that all participants are aware of their specific roles, contributing to efficient operations and effective governance.
Continuous Monitoring	<i>Activity and Mandate Fulfillment.</i> Regular meetings, comprehensive reports, and detailed analyses of effectiveness and outcomes are conducted to monitor how well NAQA fulfills its mandate and achieves its objectives.
	<i>Financial Oversight.</i> Ongoing financial monitoring ensures that resources are used efficiently and align with strategic goals, enhancing accountability and financial integrity.
Self-Assessment Report	Preparation of a Self-Assessment Report, based on ENQA recommendations, allows NAQA to evaluate its compliance with international standards and identify areas for improvement

NAQA undertakes a systematic review of its quality assurance processes, procedures, and measures at least annually. This regular scrutiny is essential for identifying areas needing adjustment or enhancement and ensuring that practices remain current with evolving educational and quality assurance standards.

### **Guaranteeing the Competence, Professionalism, and Ethical Conduct of Individuals Involved in the Agency's Activities**

NAQA sets high standards for the competence and integrity of its members, SECs, accreditation experts, and Secretariat staff, requiring professional, ethical, and upright conduct. To uphold these standards, NAQA:

1. considers professional skills, competency, and reputational qualities in the selection process for experts and members of sectoral expert councils, employer representatives, and in hiring staff for NAQA Secretariat. This ensures that all selected individuals meet the high standards required for their roles.
2. conducts educational activities such as seminars, training, and webinars for involved accreditation experts and members of sectoral expert councils. Additionally, it develops methodological materials to continuously enhance the qualifications and capabilities of these experts.
3. facilitates the exchange of experiences among participants in higher education quality assurance relationships. This initiative fosters a collaborative learning environment and promotes the sharing of best practices within the community.



4. conducts continuous internal monitoring of the quality of accreditation services and the professional and ethical behavior of the individuals involved in its activities. This monitoring helps ensure that standards are consistently met and maintained.
5. ensures compliance with the Declaration of Academic Integrity by all members, secretariat staff, and other individuals involved in its operations. It also actively disseminates the Code of Academic Integrity of NAQA for Higher Education Quality Assurance, reinforcing the commitment to ethical practices throughout the agency.

**Monitoring of competence, professionalism, quality of work.** The competence, professionalism, and quality of work of the secretariat staff are regularly monitored and assessed by the heads of the respective structural units. Criteria for evaluation: task completion, quality of output, alignment with goals. New employees undergo a probationary period where they familiarize themselves with their main duties and the Agency's requirements. The adaptation process for new hires includes training through actual performance of professional duties and mentoring. Newcomers are involved in real projects to better understand work processes, while experienced employees help them master their duties and develop the necessary skills. A systematic monitoring system is used to assess the work of secretariat employees and involved experts. Regular feedback and evaluations are conducted by the head of each structural unit. In 2023, the agency's management conducted tests on the secretariat employees' knowledge of legislation in the field of higher education quality assurance. The results indicated a sufficient level of knowledge, showing no immediate need for additional training. This structured approach to monitoring ensures quality control of work, fosters professional development of staff, and maintains the high standards necessary for the agency's activities. It also identifies areas for potential improvement, allowing for targeted training and development initiatives if required.

**Annual Evaluation of Expert Work Quality.** NAQA is committed to continuous improvement in evaluating and enhancing the performance of its experts. Our approach involves systematic feedback collection from various stakeholders, including HEIs, fellow experts, SEC members, Secretariat staff, trainers, and NAQA members. This feedback, alongside the quality of accreditation reports, is meticulously analyzed to inform improvements.

Following each expert group visit, HEIs provide feedback on the performance of the expert team, focusing on communication, adherence to the visit schedule, and overall effectiveness. Additionally, the Secretariat conducts biannual surveys among experts to evaluate their performance in accreditation processes, identify gaps in knowledge or skills, and address challenges faced during the review process.

In July 2023, NAQA established the Commission for the Evaluation of NAQA Experts' Performance. This Commission is tasked with assessing potential violations during accreditation evaluations that may affect the quality of expert work. Key actions include:

- Requesting explanations from experts regarding their performance.
- Implementing additional measures to enhance expert selection and training.
- Issuing warnings and advising on future conduct.
- Recommending further training or removal from the National Register based on substantial violations.

The grounds for removing experts from the Register by the Commission include:

- Non-compliance with accreditation procedures as stipulated in the Regulation;



- Failure to adhere to the Instructions for NAQA Experts on Organizing the Work of the Expert Panel during Accreditation Evaluations, as approved by NAQA Order No. 42, dated September 09, 2024;
- Providing inaccurate evaluations of study programmes based on the Criteria;
- Failure to offer recommendations for improving the quality of educational activities within the accredited programmes;
- Submission of unsubstantiated conclusions in accreditation reports;
- Failure to uphold principles of fairness, impartiality, and integrity throughout the accreditation process;
- Refusal to undergo mandatory training or testing to verify the knowledge and skills necessary for conducting accreditation evaluations, or failure to meet the passing score in training assessments;
- Violations of NAQA’s Anti-Corruption Programme requirements.

To date, the Commission has removed 116 experts (1.8% of the total number of experts) from the Register and referred 200 experts for additional training. The training programme aims to bolster expertise and professional standards, concluding with a comprehensive assessment. Of the 54% of invited experts who participated, 97% completed the programme, 94% passed the final test, and 91% received positive feedback from trainers. However, the programme has also highlighted persistent challenges, including superficial data analysis, inadequate knowledge of regulations, and underdeveloped communication skills.

NAQA is dedicated to addressing these challenges.

From May to July 2024, we conducted a comprehensive evaluation of expert performance, assessing their adherence to accreditation procedure and the quality of their reports. This evaluation involved feedback from various sources (see Table 6). Performance was evaluated across a diverse group of 2075 experts, including academic staff and students. The results highlighted both areas of high competence and aspects needing improvement. Based on these findings, we have pinpointed those experts who require targeted training and professional development in specific areas to enhance their effectiveness in the accreditation process.

Table 6.

Adherence to the accreditation procedure	Quality of the expert group's report
<p>Evaluations were based on:</p> <ul style="list-style-type: none"> <li>• Feedback from other experts within the group,</li> <li>• Feedback from study programme guarantors,</li> <li>• Reviews by the sectoral expert council and the NAQA Secretariat,</li> <li>• Video recordings of meetings during the visit, in the absence of other feedback.</li> </ul>	<ul style="list-style-type: none"> <li>• Justification of positive practices and strengths identified,</li> <li>• Correlation between recommendations and identified drawbacks,</li> <li>• Consideration of feedback from the Secretariat in the final report.</li> </ul>

<p>For team chairs, additional criteria included:</p> <ul style="list-style-type: none"> <li>• Timeliness and relevance of document requests,</li> <li>• Adherence to submission deadlines for report drafts and final versions</li> </ul>	
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Overall, the establishment of the Commission and the comprehensive evaluation process have strengthened accountability, improved expert training, and positively influenced report quality, but there's still room for improvement. NAQA is committed to ongoing improvement and will implement strategies to address identified issues. By investigating potential violations and providing explanations, the Commission ensures that experts adhere to the highest standards, which in turn enhances the credibility of the accreditation process. Key areas for future focus include refining evaluation methodologies to better reflect the impact of each criterion, addressing discrepancies between training performance and report quality, and developing methodologies for evaluating the work of sectoral expert councils. NAQA remains committed to continuous improvement and will implement targeted strategies to address these issues, aiming to strengthen expert performance and enhance the overall effectiveness of the accreditation process.

**Code of Academic Integrity as the Basis for Ethical Behaviour.** NAQA's Code of Academic Integrity establishes globally accepted standards for professional conduct for all individuals involved in the agency's activities. This includes NAQA Board members, Secretariat staff, experts, and SEC members. The Code ensures a strict adherence to a zero-tolerance policy towards violations of academic integrity and ethics.

The Code defines the following fundamental values of academic integrity and ethics: integrity, honesty, truthfulness, transparency, legality, respect, trust, consistent advocacy for dignified behaviour and the promotion of the principles of academic integrity under adverse external pressures, fairness, self-improvement and enhancement, responsibility, diligence, professionalism. The following actions are explicitly prohibited as they result in violations of academic integrity or ethics: fabrication and falsification, bribery and deceit, undue advantage; academic sabotage, conflict of interest, negligence, blackmail and malicious accusation.

Individuals engaged in the agency's activities must:

- uphold and advocate for the fundamental values listed;
- prevent manifestations of academic dishonesty;
- report any violations immediately to the appropriate authority based on the hierarchy and type of violation;
- bear responsibility for any breaches of these principles;
- provide truthful information about their activities;
- perform duties objectively and without bias;
- oppose conformity and condemn censorship;
- protect the freedom of thought.

**Anti-Corruption Measures and Conflict of Interest Prevention Mechanisms.** By the end of September 2020, NAQA established comprehensive procedures to avoid conflicts of interest across various activities. These guidelines were detailed in the Anti-Corruption Programme for 2020-2021, which set clear protocols for managing conflicts of interest involving the Head of the Agency, NAQA members, officials, and other secretariat employees. The programme highlights anti-corruption measures in NAQA activities, norms of professional ethics, rights and duties of the Head, NAQA Board members, officials, and other NAQA Secretariat employees, and the authorized anti-corruption official, procedures for oversight, compliance with the Programme, assessment of the measures' effectiveness, procedures for protecting individuals who report corruption, procedures for providing clarifications and training, procedures for applying disciplinary accountability measures, and procedures for conducting internal investigations.

The Anti-Corruption Programme was updated for 2022-2024, with approval in December 2022. As of October 2024, the Agency is assessing corruption risks and preparing the Anti-Corruption Programme for 2025-2026. This involves: analyzing the outcomes from previous corruption risk assessments, reviewing the impact and effectiveness of the current measures, preparing analytical briefs for each function assigned to NAQA to identify and describe functions vulnerable to corruption. Reports on the results of each Anti-Corruption Programme are publicly available on the agency's official website. These initiatives aim to enhance institutional ethics, transparency, and foster trust among stakeholders, thereby strengthening the overall accountability of the agency's activities.

### **Internal and External Feedback Mechanisms Leading to Continuous Improvement**

**Internal Feedback.** NAQA ensures continuous improvement by engaging its employees, experts, and members of Sectoral Expert Councils in feedback mechanisms:

- *Secretariat Staff.* Feedback is collected through weekly meetings between management and heads of structural units. Employees can submit improvement proposals through their structural unit heads or directly to the head of the secretariat for prompt review and implementation;
- *Experts and SEC members.* Feedback opportunities include:
  - Post-training and event feedback, which enables the Agency to refine training content, and formats;
  - Surveys covering the quality of work and areas needing further professional development, with options for suggesting improvements;
  - Regular assessments through interviews to gauge the impact of changes on internal processes;
  - Social Media Platforms (e.g. Facebook) for real-time queries and consultations

**External Feedback:** Feedback from HEIs and other stakeholders is gathered through various channels:

- *Social media and email:* analyzing public interest topics for activity adjustments;
- *Expert feedback:* from HEI representatives to refine expert rankings and internal procedures;
- *Regulatory participation:* involving stakeholders in working groups for procedural and document drafting;
- *Complaints:* addressed promptly to enhance interactions and refine procedures.

Survey findings are discussed in meetings between management and unit heads, with decisions and measures implemented and their effectiveness regularly evaluated.

### **Preventing Intolerance or Discrimination**

NAQA promotes tolerance and non-discrimination in its operations and decision-making. The agency strictly prohibits the collection and processing of personal data that may disclose sensitive aspects of an individual's private life. Regular monitoring ensures adherence to these principles.

### **Ensuring Compliance of Activities by Third Parties**

NAQA does not engage third parties in its quality assurance activities.

### **Communication with Government Bodies**

NAQA collaborates with government entities, including the Cabinet of Ministers, the Verkhovna Rada (Parliament) of Ukraine, and the President of Ukraine, to regulate and implement policies in higher education quality assurance.

### **Recognition and Authority**

The agency maintains its authority through:

- Collegiality and independence in decision-making, ensuring objectivity and impartiality in external quality assurance procedures.
- Transparency of procedures, keeping all processes and results accessible to stakeholders.
- High professional standards, upheld by qualified, competent adhered to ethics.
- Regular review and updated, enabling timely adaptation to changes in legislation, international standards, and educational needs.
- Collaboration, sharing experience.

During the Strategic Session in April 2024, a self-analysis conducted by the Agency identified tasks and timelines for improving the internal quality assurance system:

1. Review of the Policy and Regulations on Quality Assurance Activities (December 2024).
2. Enhancement of monitoring tools for assessing NAQA performance (April 2025).
3. Continuous professional development training for Secretariat staff to uphold high professional standards (ongoing).
4. Improvement of mechanisms for collecting feedback from internal and external stakeholders to ensure more effective operations (ongoing).

Responsibilities, expected outcomes, potential risks, and risk mitigation measures were analysed. These tasks were included in the National Action Plan for Higher Education Quality Assurance in Ukraine for 2024–2026.

On December 24, 2024, the Policy on Quality Assurance Activities of NAQA was approved in a new version. Other planned tasks are in progress.

Thus, NAQA actively and continuously works to enhance its processes and improve its internal quality assurance system, maintaining a high level of operational quality. These efforts align with ESG Standard 3.6.

### **ESG Standard 3.7 Cyclical external review of agencies**

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

Standard 3.7 requires agencies to undergo external review at least once every five years to confirm their compliance with ESG standards. Considering the commitments Ukraine has made under the Association Agreement with the European Union and the provisions of the Bologna Process, NAQA underscores the

strategic importance of external reviews in continuously improving policies related to quality assurance in higher education in Ukraine. These reviews help:

- Confirm compliance with ESG standards, ensuring transparency and accountability in the implementation of quality assurance policies in higher education.
- Identify areas for reform, helping to pinpoint key aspects that require improvement.
- Assess progress and make necessary policy adjustments, contributing to the ongoing enhancement of the quality assurance system.
- Engage national and international stakeholders, strengthening trust in the Ukrainian higher education system and fostering opportunities for productive cooperation.

Since its active start in 2019, NAQA has implemented a series of measures to undergo external evaluations. These measures include:

**1. Initiation of external reviews through the self-assessment report (2021).** In 2021, the Agency prepared a self-assessment report (<https://naqa.gov.ua/wp-content/uploads/2021/02/Self-Assessment-Report.pdf>), aimed at critically evaluating its processes, obtaining external feedback, identifying weaknesses, and implementing improvements. The results of the self-assessment and the recommendations provided by external experts became the basis for the development of the National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 period ([https://en.naqa.gov.ua/wp-content/uploads/2022/06/National\\_Action\\_Plan\\_of\\_Ukrainian\\_external\\_higher\\_education\\_quality.pdf](https://en.naqa.gov.ua/wp-content/uploads/2022/06/National_Action_Plan_of_Ukrainian_external_higher_education_quality.pdf)).

This plan laid out specific measures to improve processes and ensure compliance with ESG standards.

**2. Participation in the ERASMUS+ SEQA-ESG2 project (2022–2025).** In 2022, NAQA joined the ERASMUS+ SEQA-ESG2 project, coordinated by ENQA. The project supports agencies in achieving compliance with ESG standards and obtaining full membership in ENQA (<https://en.naqa.gov.ua/?p=2872>). Through consultations, active participation in training and seminars, NAQA has been able to refine its policies and practices while exchanging experiences with international partners, thus enhancing its compliance with ESG.

At the beginning of 2024, NAQA presented a report on the implementation of the National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 period, which was positively assessed by ENQA representatives. Notable improvements included:

- Strengthening the Agency's operations through effective collaboration with the Ministry of Education and Science of Ukraine;
- Updating the Regulations on Accreditation of Study Programmes;
- Legislative regulation of post-accreditation monitoring procedures, with the pilot phase currently ongoing;
- Optimization of NAQA's legal status, ensuring compliance with Standard 3.2;
- Enhancing expert training systems and improving monitoring procedures for quality assessments.

Based on the received feedback, the Agency developed a draft of The National Action Plan on Ukrainian external higher education quality assurance for 2024-2026 period. The draft was discussed at a strategic session in April 2024 (organized with the support of the OSCE, involving experts). It was approved on NAQA Board meeting on June 2024 and submitted to ENQA, where it received approval. The Agency is now implementing the planned actions and measures.

**3. Annual self-assessment of ESG compliance in the "Report on the Quality of Higher Education in Ukraine".** Every year, NAQA conducts a self-assessment and reports on the implementation of ESG standards in the

"Report on the Quality of Higher Education in Ukraine", ensuring transparency and accessibility while allowing for the prompt adjustment of strategies based on feedback received.

**4. Engagement of the Advisory Board members.** NAQA actively involves international experts in analyzing the agency's activities. Annual reports on the agency's work and the "Report on the Quality of Higher Education in Ukraine" are translated into English and provided to the Advisory Board for feedback and discussions. The results of these meetings, which foster effective dialogue, are made publicly available, reinforcing NAQA's commitment to transparency (see minutes [https://en.naqa.gov.ua/?page\\_id=1430](https://en.naqa.gov.ua/?page_id=1430)).

**5. Assessment of agency practices through participation in conferences, events, and projects.**

NAQA actively shares its experiences by participating in international training, seminars, and projects, which offer opportunities for external evaluations. Through the SEQA-ESG2 project, NAQA's expert training system has generated significant international interest, and NAQA continues to refine its expert training methods.

(<https://naqa.gov.ua/2024/10/%d0%b4%d1%80%d1%83%d0%b3%d0%b8%d0%b9-%d0%b2%d0%be%d1%80%d0%ba%d1%88%d0%be%d0%bf-%d0%b2-%d1%80%d0%b0%d0%bc%d0%ba%d0%b0%d1%85-%d0%bf%d1%80%d0%be%d1%94%d0%ba%d1%82%d1%83-seqa-esg-2/>). NAQA's expert training system was also highly praised in other international projects (for example, see <https://naqa.gov.ua/2023/12/%d0%b7%d1%83%d1%81%d1%82%d1%80%d1%96%d1%87-%d0%b7-%d0%b5%d1%81%d1%82%d0%be%d0%bd%d1%81%d1%8c%d0%ba%d0%b8%d0%bc-%d0%b0%d0%b3%d0%b5%d0%bd%d1%82%d1%81%d1%82%d0%b2%d0%be%d0%bc-%d1%96%d0%b7-%d0%b7%d0%b0/>, <https://naqa.gov.ua/2023/10/%d0%b2%d1%96%d0%b7%d0%b8%d1%82-%d1%83-%d1%88%d0%b2%d0%b5%d0%b4%d1%81%d1%8c%d0%ba%d0%b5-%d1%83%d0%bf%d1%80%d0%b0%d0%b2%d0%bb%d1%96%d0%bd%d0%bd%d1%8f-%d0%b2%d0%b8%d1%89%d0%be%d1%97-%d0%be%d1%81%d0%b2/>).

**6. Independent assessment of NAQA's activities.** In 2023, independent external assessments of NAQA's achievements were conducted by the Ukrainian Center for European Policy and the Konrad Adenauer Foundation, which confirmed NAQA's success in implementing ESG standards, ensuring institutional resilience, and adapting accreditation procedures during the martial law period ([https://ucep.org.ua/wp-content/uploads/2023/05/final\\_report\\_aa\\_ucep\\_2023\\_ukr.pdf](https://ucep.org.ua/wp-content/uploads/2023/05/final_report_aa_ucep_2023_ukr.pdf)). The agency's effectiveness in improving the quality assurance system in higher education in Ukraine and its contribution to international cooperation in this field are underscored in the scientific and analytical report titled "Higher Education in Ukraine During Martial Law and Post-War Recovery: Challenges and Responses," prepared by the Institute of Higher Education of the National Academy of Pedagogical Sciences of Ukraine ([https://ihed.org.ua/wp-content/uploads/2024/01/VO-Ukr-v-umovah-voyen-stanu-ta-pisl-vidnovl-NAPN\\_2023-172p.pdf](https://ihed.org.ua/wp-content/uploads/2024/01/VO-Ukr-v-umovah-voyen-stanu-ta-pisl-vidnovl-NAPN_2023-172p.pdf)). The agency actively studies these materials and takes them into account in its ongoing efforts to enhance its operations and policies.

**7. Engagement of stakeholders and experts in discussions.** Stakeholder surveys are conducted regularly. Public discussions and the involvement of both Ukrainian and international experts are mandatory aspects of preparing new regulatory acts.

Thus, the outlined actions demonstrate NAQA's commitment to external reviews, its understanding of their strategic importance, and its ability to respond to external feedback, in full compliance with Standard 3.7. This self-assessment report also serves to seek further external evaluation of NAQA's activities, reinforcing the agency's ongoing efforts to improve and align with ESG principles.



## Annexes

### Annex A. Activities of the Structural Units of NAQA

Structural Unit	Areas of Activity
<b>Study programmes accreditation</b>	
Study Programme Accreditation Department	<ul style="list-style-type: none"> <li>• Processment of notifications and creation of a Schedule of acceptance of accreditation applications and information on self-evaluation of study programmes for each academic year from higher education institutions and research institutions through the plan.naqa.gov.ua web service;</li> <li>• Verification of formal features (availability of a licence, correctness of the information, etc.) of the self-evaluation reports submitted by the institutions and its registration in the NAQA IT system;</li> <li>• Consultation support to the guarantors on procedural issues via e-mail accreditation@naqa.gov.ua;</li> <li>• Respond to public appeals and official requests for information from higher education institutions within the authority of the department;</li> <li>• Information and analytical work and quality control of accreditation case files;</li> <li>• Educational and consulting activities (participation in webinars, conferences, trainings, round tables and international programmes on accreditation of study programmes);</li> <li>• Preparation of materials for the NAQA Board meeting within the authority of the department.</li> </ul>
Expert Support Department	<ul style="list-style-type: none"> <li>• Organisation of the selection of qualified experts for accreditation of study programmes in the relevant specialities;</li> <li>• Organisation of work on preparation, training and testing of experts;</li> <li>• Organisational support of accreditation examinations;</li> <li>• Advising experts on the accreditation of study programmes;</li> <li>• Management of the register of experts;</li> <li>• Support of the Commission for Quality Assurance of Expert's Work;</li> <li>• Analysis of experts' work;</li> <li>• Conclusion of contracts with experts;</li> <li>• Preparation of draft acts on the activities of experts.</li> </ul>
Support of Expert Department	<ul style="list-style-type: none"> <li>• Organisational, informational, analytics and technical support for the activities of sectoral expert councils (hereinafter – SECs);</li> <li>• Support for the activities of the SECs in reviewing accreditation cases, and higher education standards and support in holding SECs meetings;</li> </ul>

	<ul style="list-style-type: none"> <li>• Organisation of work on the development of analytical and information support for the SECs during the consideration of accreditation cases in the NAQA IT system and other SEC activities;</li> <li>• Organisational, documentary, technical and informational support of the competition to the SECs;</li> <li>• Participation in the development and amendment of regulations on the accreditation of study programmes and the work of the SECs;</li> <li>• Cooperation with other structural units of the Secretariat on issues related to the activities of the SECs.</li> </ul>
<p><b>Specialised councils and integrity</b></p>	
<p>Academic Integrity and One-time Councils' Operation Department</p>	<ul style="list-style-type: none"> <li>• Administration of the NAQA's information system designed to record the information required by the Procedure for Awarding the Degree of Doctor of Philosophy and Cancellation of Decisions of a One-time Specialised Academic Council of a Higher Education Institution or Research Institution on Awarding the Degree of Doctor of Philosophy (hereinafter – Procedure No. 44);</li> <li>• Provision of information, consultation and methodological assistance to higher education institutions (research institutions) on the application of Procedure No. 44;</li> <li>• Support in reviewing of notifications of violations of the thesis defence procedure by the NAQA Academic Councils Committee and applications by the NAQA Academic Councils Committee on the presence or absence of violations of the thesis defence procedure established by Procedure No. 44;</li> <li>• Support in reviewing by NAQA Ethics Committee of complaints/notifications regarding the presence or absence of academic plagiarism, fabrication, falsification in the thesis and/or scientific publications that reflect the thesis scientific results and by NAQA of submissions of Ethics Committee on the presence or absence of academic plagiarism, fabrication, falsification in the thesis and/or scientific publications that reflect the thesis scientific results;</li> <li>• Participation in the development and amendment of regulations on academic integrity, certification of PhD candidates and the activities of one-time specialised academic councils.</li> </ul>
<p><b>Support of NAQA administrative and economic activities</b></p>	
<p>Preparation of Meetings and Support of the Committees' Work Department</p>	<ul style="list-style-type: none"> <li>• Organisation of NAQA Board meetings and drafting of NAQA decisions;</li> <li>• Provision of information, organisational and technical support for NAQA Board meetings;</li> <li>• Provision of legal, informational, organisational and technical support to the Appeals Committee and the Military Education Committee;</li> <li>• Provision of legal, informational, organisational and technical support to the Commission for Quality Assurance of Expert's Work;</li> <li>• Preparation of documents based on the results of the NAQA Board meeting.</li> </ul>

	<ul style="list-style-type: none"> <li>• Preparation of analytical information on accreditation cases;</li> <li>• Entry of information into NAQA IT system.</li> </ul>
Legal Department	<ul style="list-style-type: none"> <li>• Organisation of legal work aimed at correct application and strict compliance with the requirements of legislation and other regulatory acts by NAQA and its employees in the performance of their tasks and duties;</li> <li>• Ensure representation (self-representation) of NAQA's interests in the courts of Ukraine and other bodies in accordance with the established procedure;</li> <li>• Development and participation in the development of draft legal acts and other regulatory documents on issues within the competence of NAQA;</li> <li>• Revision, together with the structural units of NAQA's secretariat, regulatory acts and other documents on issues within its competence in order to bring them into compliance with the law;</li> <li>• Organisation of work related to the conclusion of contracts with higher education institutions, participation in their preparation, provision of legal assessment and implementation of measures aimed at fulfilling contractual obligations;</li> <li>• Implementation of measures to prevent corruption in NAQA and control over their implementation in accordance with the law;</li> <li>• Organisation of claims and lawsuits and control over their execution;</li> <li>• Analysis the materials received from law enforcement and regulatory authorities, the results of claim work, etc., and taking measures to eliminate the identified violations;</li> <li>• Provision clarifications on the application of legislation, providing legal advice on issues within the competence of NAQA;</li> <li>• Promotion compliance with the law in the exercise of the rights of NAQA's staff.</li> </ul>
Leading Specialist on Anti-Corruption Activities	<ul style="list-style-type: none"> <li>• Organising anti-corruption measures and monitoring the implementation of anti-corruption legislation;</li> <li>• Organising work on managing corruption risks in NAQA activities;</li> <li>• Providing methodological and consulting assistance regarding anti-corruption legislation;</li> <li>• Implementing measures to identify conflicts of interest and facilitate their resolution;</li> <li>• Checking the status of filing declarations and notifying the National Agency on Corruption Prevention of cases of their failure to file or untimely filing;</li> <li>• Considering reports of violations of the requirements of the Law of Ukraine "On Corruption Prevention";</li> </ul>

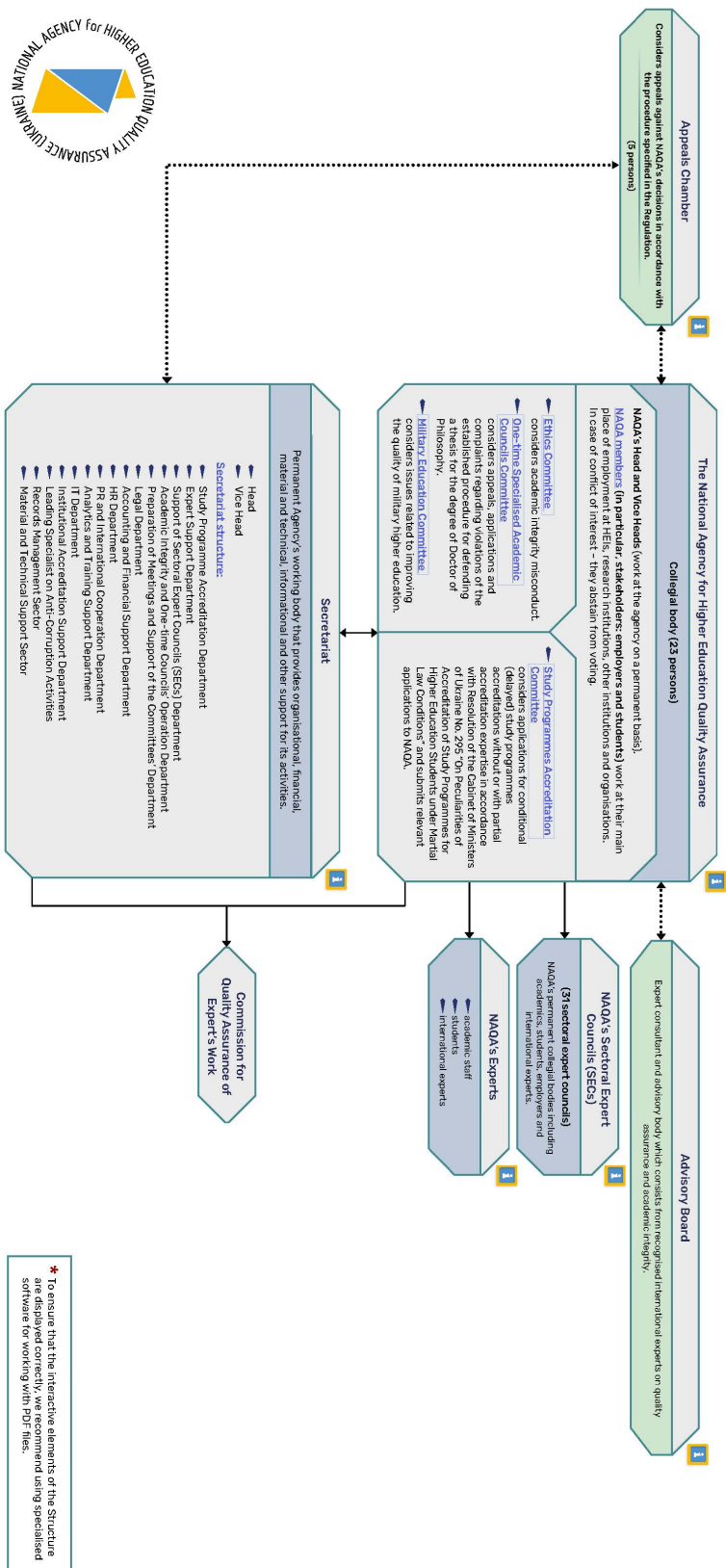
	<ul style="list-style-type: none"> <li>• Ensuring the protection of persons who reported violations of anti-corruption legislation from the application of negative measures of influence by the management of NAQA;</li> <li>• Informing the Head of NAQA, the National Agency on Corruption Prevention or other specially authorised entities in the field of combating corruption about the facts of violations of anti-corruption legislation;</li> <li>• Performing other tasks stipulated by the legislation in the field of preventing and combating corruption.</li> </ul>
Material and Technical Support Sector	<ul style="list-style-type: none"> <li>• Organisation and implementation of measures for the material and technical support of NAQA Secretariat;</li> <li>• Organisation and implementation of processes for the resource provision of structural units with stationery, office equipment and supplies, computer and peripheral equipment, furniture, etc.;</li> <li>• Organisation of measures to ensure proper maintenance and operation of the office premises;</li> <li>• Organisation and implementation of processes for the technical maintenance of communication facilities, energy and water supply systems, plumbing and heating;</li> <li>• Implementation of measures to organise and ensure timely repair, maintenance and modernization of material and technical facilities;</li> <li>• Implementation of control over the serviceability and maintenance in proper technical condition of the material and technical base of the Secretariat.</li> </ul>
Records Management Sector	<ul style="list-style-type: none"> <li>• Establishment of a unified procedure for documenting the Secretariat's activities and work with documents using modern automated systems, methodological guidance and control over compliance with the established procedure for work with documents in the Secretariat's structural units;</li> <li>• Developing and ensuring compliance with the NAQA's Instruction on Record Keeping and the nomenclature of cases;</li> <li>• Organisation of document flow, formation of files, their storage and preparation for transfer to the archive;</li> <li>• Ensuring processing of orders and instructions of the Head of NAQA, his/her deputies, and the Secretariat management;</li> <li>• Control over timely consideration and processing of documents in the Secretariat, analysis of the reasons for violation of the deadlines for documents execution and submission of proposals for their elimination;</li> <li>• Ensure fulfilment of labour protection and fire safety requirements and control over unconditional compliance with labour protection and fire safety requirements by employees of other structural units of NAQA;</li> <li>• Development and timely revision of the Labour Protection Manual;</li> </ul>

	<ul style="list-style-type: none"> <li>• Participation in the implementation of measures to purchase and systematically update office equipment, technical means of labour, equipment of workplaces of the NAQA employees;</li> <li>• Participation in the preparation of materials for public procurement on issues within the competence of the department;</li> <li>• Developing the nomenclature of NAQA's files;</li> <li>• Keeping state records of documents of the National Archival Fund (hereinafter – NAF) and annual submission of information on their number in the form established by the Rules of Organisation of Record Keeping and Archival Storage of Documents in State Bodies, Local Self-Government Bodies, Enterprises, Institutions and Organisations approved by the Order of the Ministry of Justice of Ukraine No. 1000/5 dated 18 June 2015, by the State Archival Service of Ukraine;</li> <li>• Conduction of preliminary examination of the value of documents stored in the records management sector, drafting and submitting to NAQA's expert committee draft inventories of permanent storage files, inventories of long-term (over 10 years) storage files, inventories of personnel files and acts of withdrawal for destruction of documents not included in the NAF;</li> <li>• Preparation and transfer of documents to the NAF and to the Central State Archive of Higher Authorities and Administration of Ukraine.</li> </ul>
Accounting and Financial Support Department	<ul style="list-style-type: none"> <li>• Maintenance of accounting of financial and economic activities of NAQA and preparation of reports in accordance with national accounting regulations (standards), as well as other regulatory legal acts, including using a unified automated accounting and reporting system;</li> <li>• Reflection of reliable and complete information on business transactions and performance results necessary for the operational management of budget allocations and financial and tangible/intangible resources;</li> <li>• Planning and analysis of NAQA's financial and economic activities;</li> <li>• Operational management of funds within the approved budget of the general and special funds and their redistribution;</li> <li>• Ensure compliance with budget legislation when making budget commitments, timely submission for registration, making payments in accordance with the budget commitments;</li> <li>• Ensure control over the availability and movement of property, the use of financial and tangible/intangible resources in accordance with approved regulations;</li> <li>• Prevention of negative phenomena in financial and economic activities, identification and mobilisation of internal reserves;</li> <li>• Co-operation with other structural units of the Secretariat on issues related to the activities of the department.</li> </ul>

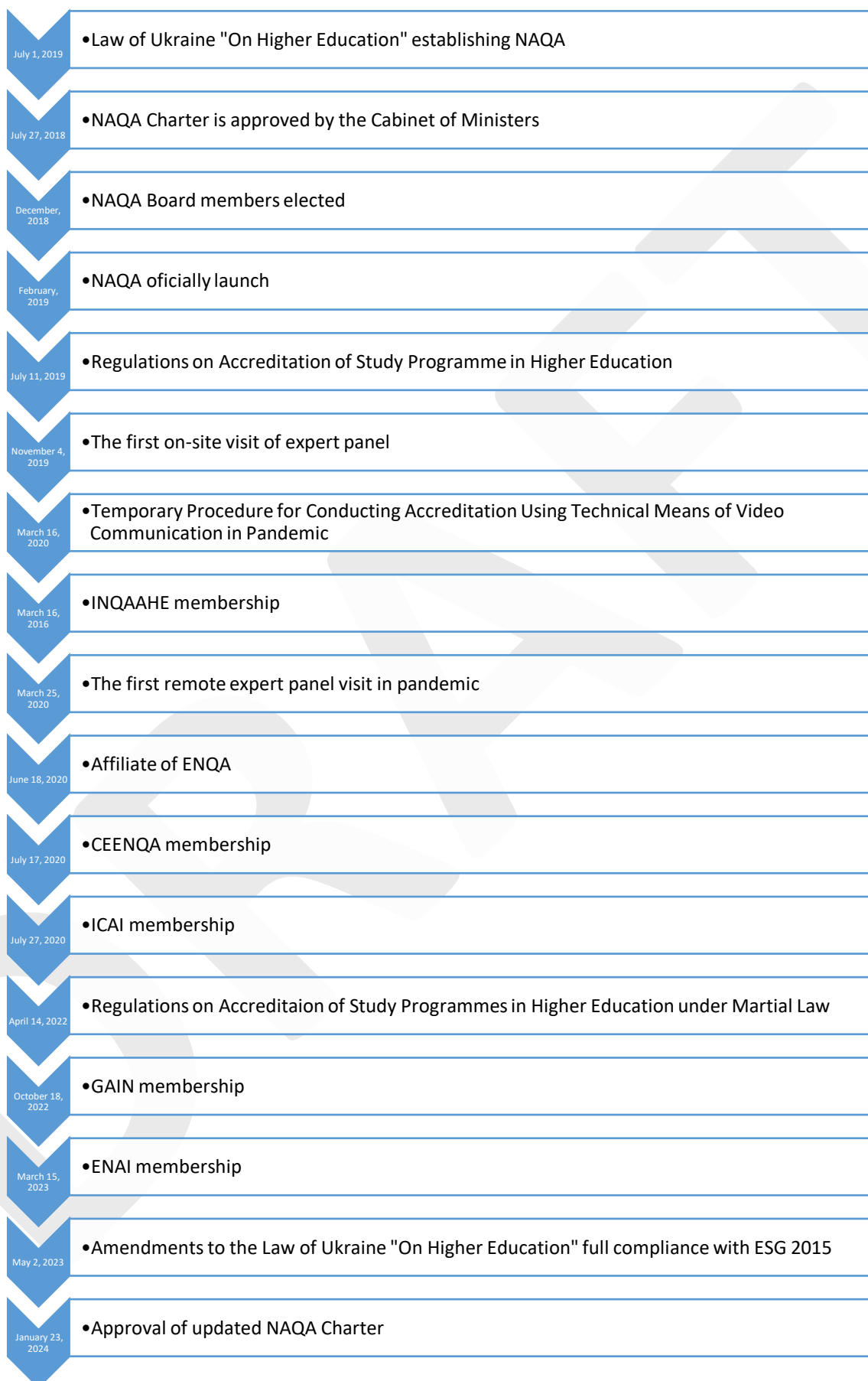
HR Department	<ul style="list-style-type: none"> <li>• Ensuring and organising HR processes at NAQA in accordance with the requirements of the law;</li> <li>• Organisation of HR management processes in accordance with the needs of the Secretariat;</li> <li>• Maintenance of personnel records;</li> <li>• Maintenance of military records of NAQA's staff.</li> </ul>
IT Department	<ul style="list-style-type: none"> <li>• IT support of NAQA.</li> </ul>
PR and International Cooperation Department	<ul style="list-style-type: none"> <li>• Formation of NAQA's positive image;</li> <li>• Informing the public about NAQA's activities;</li> <li>• Cooperation and interaction with the media, international and foreign agencies and institutions, partners;</li> <li>• Monitoring of media coverage of NAQA's activities, organisation of prompt response to critical messages;</li> <li>• Monitoring public opinion on the assessment of NAQA's activities;</li> <li>• Formation and implementation of NAQA's information policy;</li> <li>• Organisational support of the NAQA's website, maintenance of social media, in particular, publication of documents issued by NAQA and decisions made by it on the website;</li> <li>• Organising and holding press conferences, round tables, international meetings and other events (online and offline);</li> <li>• Monitoring grant projects, writing grant applications, preparing and implementing grant projects;</li> <li>• Processing of certificates issued by foreign accreditation or quality assurance agencies for higher education and adding information to the Unified State Electronic Database on Education.</li> </ul>
Analytics and Training Support Department	<ul style="list-style-type: none"> <li>• Organisation of a unified information and analytics support for NAQA's activities;</li> <li>• Monitoring and analysis of statistical information on the state and trends of higher education;</li> <li>• Coordination of activities in the field of information exchange with educational, scientific institutions and other organisations;</li> <li>• Preparation of information and analytics on quality assurance in higher education;</li> <li>• Development of educational and methodological materials for training of experts and members of the SECs;</li> <li>• Conducting trainings and other educational events.</li> </ul>



## Annex B. NAQA's Organizational Structure



## Annex C. NAQA Milestones



**Annex D (Table 1. Compliance of the NAQA study programme accreditation criteria with ESG 2015, part 1)**

Standards and Guidelines for Quality Assurance ESG-2015, part 1	Criteria for the Study Programme External Quality Evaluation	
	Bachelor and Master study programmes	PhD study programmes
1.1. Policy for quality assurance	5. Control measures, evaluation of students, and academic integrity (5.4.).	
	8. Internal quality assurance of the study programme (8.1., 8.2., 8.3., 8.4, 8.5., 8.6., 8.7.)	
		10. Study through research (10.7.).
1.2 Design and approval of programmes	1. The design of the study programme (1.1., 1.2., 1.3., 1.4., 1.5).	
	2. The structure and content of the study programme (2.1., 2.2., 2.3., 2.5., 2.6., 2.8., 2.9).	
	5. Control measures, evaluation of students, and academic integrity (5.2.).	
1.3 Student-centered learning, teaching, and assessment	2. The structure and content of the study programme (2.4., 2.5., 2.6., 2.9.).	
	3. Access to the study programme and learning outcomes recognition (3.3., 3.4.).	
	4. Teaching and learning under the study programme (4.1., 4.3., 4.5.).	
	5. Control measures, evaluation of students, and academic integrity (5.1., 5.3).	
		8. Internal quality assurance of the study programme (8.2.).
		10. Study through research (10.1., 10.5.).
1.4 Student admission, progression, recognition, and certification	3. Access to the study programme and learning outcomes recognition (3.1., 3.2.).	
	4. Teaching and learning under the study programme (4.2.).	
	5. Control measures, evaluation of students, and academic integrity (5.1., 5.2., 5.3.).	
1.5 Teaching staff	6. Human resources (6.1., 6.2., 6.3., 6.4.).	
		10. Study through research (10.2.).
1.6 Learning resources and student support	4. Teaching and learning under the study programme (4.4.).	
	7. Educational environment and material resources (7.1., 7.2., 7.3., 7.4., 7.5., 7.6.).	
		10. Study through research (10.4., 10.5).
1.7 Information management.	8. Internal quality assurance of the study programme (8.2, 8.3, 8.4., 8.5).	
	9. Transparency and publicity <sup>1</sup> (9.2.).	
1.8 Public information	9. Transparency and publicity (9.1., 9.3.).	
1.9 Ongoing monitoring	8. Internal quality assurance of the study programme (8.1., 8.2., 8.3., 8.4., 8.5., 8.6., 8.7.)	

and periodic review of programmes	
1.10 Cyclical external quality assurance	Implemented in: <ul style="list-style-type: none"> <li>• Law of Ukraine On Education (Articles 46, 48, 49);</li> <li>• Law of Ukraine On Higher Education (Articles 24, 25);</li> <li>• Law of Ukraine On Licensing Types of Economic Activity;</li> <li>• Cabinet of Ministers Resolution No. 1187 of December 30, 2015, On Approval of the Licensing Conditions for Educational Activities of Educational Institutions;</li> <li>• Cabinet of Ministers Resolution No. 347 of May 10, 2018, On Amendments to the Cabinet of Ministers Resolution No. 1187 of December 30, 2015</li> </ul>

**Annex E. Table 4. Current number of experts according to the field of study**

Field of study	Current number of experts: academic staff	Current number of experts: students
01 Education	739	192
02 Culture and arts	168	65
03 Humanities	398	86
04 Theology	16	7
05 Social and behavioral studies	556	117
06 Journalism	47	16
07 Management and administration	803	130
08 Law	175	78
09 Biology	111	42
10 Natural sciences	328	68
11 Mathematics and statistics	102	15
12 Information technologies	434	82
13 Mechanical engineering	219	42
14 Electrical engineering	157	25
16 Chemical and bioengineering	76	19
17 Electronics and telecommunication	152	44
18 Manufacturing and technology	196	37
19 Architecture and construction	141	32

20 Agricultural science and food	184	30
21 Veterinary medicine	30	5
22 Health	275	93
23 Social work	83	18
24 Services	147	24
25 Military sciences, national security, and border security	128	0
26 Civil security	84	6
27 Transport services	176	17
28 Public administration	112	44
29 International relations	128	39

Annex F.

Fig.1

