NATIONAL AGENCY for HIGHER EDUCATION QUALITY ASSURANCE (UKRAINE)

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

KYIV
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Approved
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The Self-Assessment Report of the National Agency for Higher Education Quality Assurance 2025 (SAR) has been prepared as part of the external review process by the European Association for Quality Assurance in Higher Education and the European Quality Assurance Register for Higher Education. The SAR provides self-reflections on NAQA's Mission, Strategy and how the Agency meets Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) Part 2 and 3. It includes SWOT analysis, stakeholders' feedback on NAQA activities and SAR, key challenges Agency currently faces and highlights NAQA's internal and external quality assurance best practices.

Звіт самооцінювання Національного агентства із забезпечення якості вищої освіти 2025 був підготовлений як частина процесу зовнішнього оцінювання Європейською асоціацією із забезпечення якості вищої освіти та Європейським реєстром агентств із забезпечення якості. Звіт містить самоаналіз місії, стратегії та відповідності агентства другій та третій частині Стандартів і рекомендацій щодо забезпечення якості в Європейському просторі вищої освіти (ESG 2015). Звіт самооцінювання включає SWOT-аналіз, відгуки стейкголдерів на діяльність та на Звіт, ключові виклики з якими наразі стикається Національне агентство, а також кращі практики внутрішньої та зовнішньої системи забезпечення якості.

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LIST OF ABBREVIATIONS

CEENQA — Central and Eastern European Network of Quality Assurance Agencies in Higher Education

CLOUD HED — Disaster Resilience in Higher Education Systems via Cloud University Model

CMU — the Cabinet of Ministers of Ukraine

DIGIUNI — Digital University – Open Ukrainian Initiative

DOMANI — Developing Micro-credentials Ecosystems in Ukraine and Mongolia for Competitive and Resilient Green Economies

ECTS — European Credit Transfer and Accumulation System

EDUQAS — Implementation of Education Quality Assurance System via Cooperation of University-Business-Government in HEIs

EHEA — the European Higher Education Area

ENAI — European Network for Academic Integrity

ENQA — the European Association for Quality Assurance in Higher Education

EP — Expert Panel

EQAR — the European Quality Assurance Register for Higher Education

ESG 2015 — the Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESTDEV — Estonian Centre for International Development

ESU — The European Students' Union

EUA — European University Association

EURASHE — European Association for the Applied Sciences in Higher Education

FEU — Federation of Employers of Ukraine

GAIN – Global Academic Integrity Network

GTUA — Green Transformation at Ukrainian Universities

GTUA-EDU — Education for Green Transition

HAKA — Estonian Quality Agency for Education

HE — Higher Education

HEI — Higher Education Institution

ICS — Information and Communication System

INQAAHE — International Network for Quality Assurance Agencies in Higher Education

ISCED — International Standard Classification of Education

MoES – Ministry of Education and Science of Ukraine

NACP — National Agency on Corruption Prevention

NAES — National Academy of Educational Sciences of Ukraine

NAQA — the National Agency for Higher Education Quality Assurance

NASU — National Academy of Science of Ukraine

NQA — National Qualifications Agency

OPTIMA — Open Practices, Transparency and Integrity for Modern Academia

PhD — Doctor of Philosophy

QA — Quality assurance

SAR — Self-assessment report

SC — Subcriterion

SEC — Sectoral Expert Council

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

SimS — Simulation medicine and Scenario-based learning for emergency care

Smart PI — Students' Personalised Learning Model, Based on the Virtual Learning Environment of Intellectual Tutoring "Learning with No Limits"

SQAA — Slovenian Agency for Quality Assurance in Higher Education

UAS — Ukrainian Association of Students

UkraineDigiTrans — Digital Transformation for Medical Education in Ukraine

USEDE — Unified State Electronic Database on Education

USL — Ukrainian Students League

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 for Quality Assurance in Higher Education (ENQA) and inclusion in the European Quality Assurance Register for Higher Education (EQAR).

The Ukrainian higher education quality assurance system was launched in 2019 and is still under the process of continuous improvement. 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, introducing quality assurance systems and actively engaging students, employers and the other stakeholders into decision-making and quality assurance processes, fighting against corruption, and entrancing autonomy of higher education institutions (HEIs).

Since NAQA launch in 2019 the key legislative acts, regulations, and supporting documents have been developed and improved. The process of study programme accreditation aligned to ESG 2015 has been launched from the scratch.

The preparation of this Self-Assessment Report (SAR) has been guided by the requirements of ENQA and EQAR. It follows the suggested structure and is devided into 12 chapters.

Chapter 1 is introduction.

Chapter 2 outlines the process and timeline of SAR development.

Chapter 3 provides an overview of the national higher education system in Ukraine and the accreditation framework prior to NAQA's establishment.

Chapter 4 presents NAQA's history, mission and strategy, organisational structure, and describes the Agency's activities within the scope of the ESG.

Chapter 5 focuses on NAQA's quality assurance processes and methodology.

Chapter 6 details the Agency's internal quality assurance procedures.

Chapter 7 highlights NAQA's international activities, including cooperation with foreign QA agencies and other stakeholders, membership in international organisations, involvement in international projects, and support from international donors.

Chapters 8 and 9 analyse NAQA's activities in relation to ESG Parts 2 and 3, particularly regarding study programme accreditation.

Chapter 10 presents stakeholders' feedback on NAQA's work and the SAR.

Chapter 11 contains a SWOT analysis of the Agency.

Chapter 12 outlines the key challenges and areas for future development.

The annexes are provided following the final chapter.

Stakeholders (students, employers, HEIs, educational experts, international partners) have been actively engaged into the SAR development and their feedback has been duly considered and incorporated throughout the process.

2. DEVELOPMENT OF THE SELF-ASSESSMENT REPORT

The preparation for NAQA self-assessment has started back in 2021 with the development of the Self-Assessment Report (2019-2021). In order to address the identified challenges NAQA has developed the National Action Plan for 2022-2023 and joined Erasmus+ Supporting European QA Agencies in Meeting the ESG 2 (SEQA-ESG 2) project to get peer support and learn from other agencies' experience.

The development of the NAQA Self-Assessment Report (SAR) began in May 2024 with data collection by the SAR authors' team. Over the course of eight months, the authors held regular meetings to analyse and discuss the current progress of the report.

In December 2024 the composition of the extended working group along with its Chair and Secretary, was approved by NAQA Head to manage preparation for the external review by ENQA and EQAR.

The first SAR draft was completed by the end of the year and shared with the NAQA Board, Advisory Board, and other stakeholders including students and employers. Following the collection and analysis of feedback on the initial draft, the second version was presented and published on the NAQA website for broader public discussion.

A series of working meetings was held to revise and proofread the second draft, involving active participation from NAQA Board members and Secretariat staff.

Beginning in April 2025, NAQA received feedback from a broad range of stakeholders, including student unions, employers, representatives of higher education institutions, members of the Advisory Board, national and international quality assurance experts and partners. This stage of feedback collection was one of the key components of the SAR development process, and the suggestions received were thoroughly considered and incorporated into the final version.

The final SAR version was approved at the NAQA Board meeting in July 2025. The stages of SAR development are illustrated in Figure 1.

Figure 1. Self-assessment report development timeline

Self-assessment report development timeline

Date	Activity
2022-2025	• Participation in SEQA-ESG 2 project, staff trainings
May 2024- January 2025	• Collection of data, information, materials, evidence
May-December 2024	• Working meetings & discussion of compliance with ESG standards by SAR developers
December 2024	• Approval of NAQA working group on preparing for ENQA/EQAR review (Order №60 December 20, 2024)
December 2024	• Preparation of the first draft and internal discussion
January- March 2025	• Consultations with stakeholders and international Advisory Board
April 2025	• Revision of draft & preparation of the second version • Second draft is available for wider stakeholders discussion
April-May 2025	• Proofreading of SAR second version
April-June 2025	• Collection of stakeholders (students, employers) opinion
July 2025	• Preparation of the final version and NAQA Board approval
August 2025	• SAR final preparation and submission

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 (HE) system consists of the following:

1. Higher education institutions of all ownership forms. There are three types of HEIs: state-owned (funded by the state budget), municipal (managed and funded by the local authorities) and private.

2. Levels and degrees (qualifications) of higher education. Training of specialists with higher education is carried out according to the relevant study programmes at the following levels of higher education as per the Bologna Process: initial level (short cycle); first (bachelor's) level; second (master's) level; and third (PhD) level. Higher education at each level involves the successful implementation of the relevant study 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 specialities. The list of areas of knowledge and specialities 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 specialities. The new list of areas of knowledge, which entered into force on November 1, 2024, includes 10 areas plus 1 "Security and Defence " and 110 specialities (Resolution of the Cabinet of Ministers of Ukraine "On approval of the list of fields of knowledge and specialties in which applicants for higher and professional pre-higher education are trained" (edition dated 02/25/2025)).

4. Study programmes. The study programme contains: a list of study components; their logical sequence; the 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. Licensing Conditions for Conducting 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 facilities together with the data that allow its confirmation.

6. Higher education stakeholders: administrative and teaching staff; students; employers; practitioners involved into the educational process; other employees of higher education institutions, etc.

The higher education quality assurance system in Ukraine consists of the following: 1) internal quality assurance of higher education institutions; 2) external quality assurance; 3) internal quality assurance of NAQA.

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

Between 1990 and 2010, the number of higher education institutions (HEIs) in Ukraine grew rapidly driven by the rise of private institutions and expanded branch networks, despite declining

school graduate numbers and economic challenges (See Figure 2). However, following the annexation of Crimea and ongoing russian aggression since 2014, the number of institutions began to fluctuate. The full-scale russian invasion in 2022 triggered a new wave of forced migration and institutional reorganization. In response, Ukraine's government is developing a modernized HEI network through their enlargement, mergers and other types of reorganisation.

Figure 2. The number of HEIs in 1990-2025
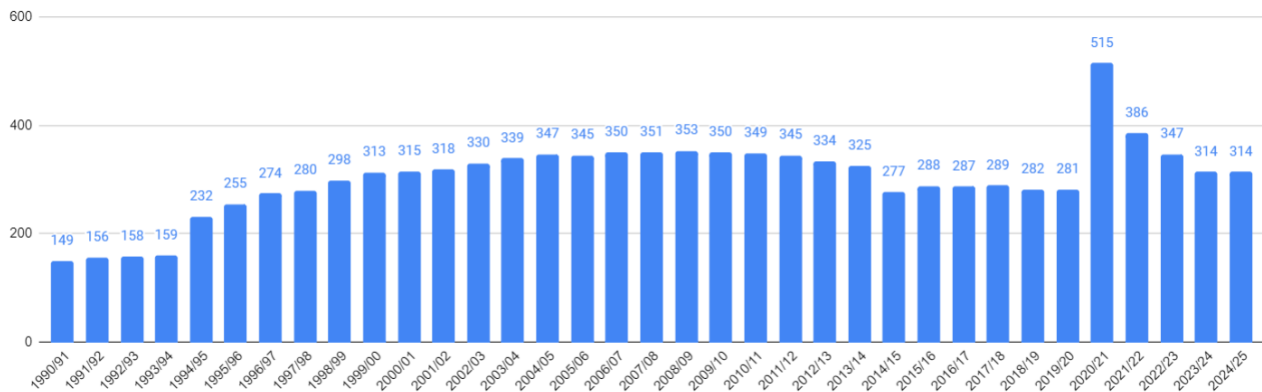
As of January 1, 2025, the number of higher education providers (universities, academies, institutes, colleges) is 625, where 434 are state-owned (state funded), 40 are municipal (funded by local authorities) and 151 are in private ownership.

According to the Institute of Higher Education study, it is reasonable to merge HEIs network to a sustainable level that Ukrainian society actually requires, and that Ukrainian economy could support. However, not much progress has been demonstrated in this regard — for many reasons, including a lack of understanding of the mechanisms for closing or merging higher education institutions. This is a current issue facing the Ministry of Education and Science of Ukraine. During the last couple of years some universities have been merged and this process is ongoing.

3.2 Students

According to the State Statistics Committee of Ukraine, the total number of students, has been gradually declining since 2008. At the beginning of the 1990–1991 academic year, there were 881,300 students studying at Ukrainian HEIs (universities, academies, institutes). The number reached its highest point in 2007–2008, with a total of 2,372,500 students. Following that, there was a gradual decline (See Figure 3). The reasons for the decrease in the number of students include demographics and economic crises, the annexation of Crimea and the russia invasion.

According to the Unified State Electronic Database on Education (hereinafter USEDE), as of January 1, 2025, the total number of students is 1 075 285 students. 35% of students get state funding comparing to 65% of students who are privately funded.

The distribution of students by level of higher education is as follows: 639 (< 1%) — junior bachelor, 736 483 (68,53%) — bachelor, master — 282 414 (26,28%), doctor of arts — 236 (< 1%), and PhD — 54 766 (5,10%).

The regional distribution of students is the following: 25,54% of students study in Kyiv, 9,97% — in Lviv region, 9,81% — in Kharkiv region, 6,46% — in Dnipropetrovsk region, and 6,21% in Odesa region. This correlates with the number of HEIs in respective regions.

Figure 3. The number of HE students in 1990-2025 (thousands people)
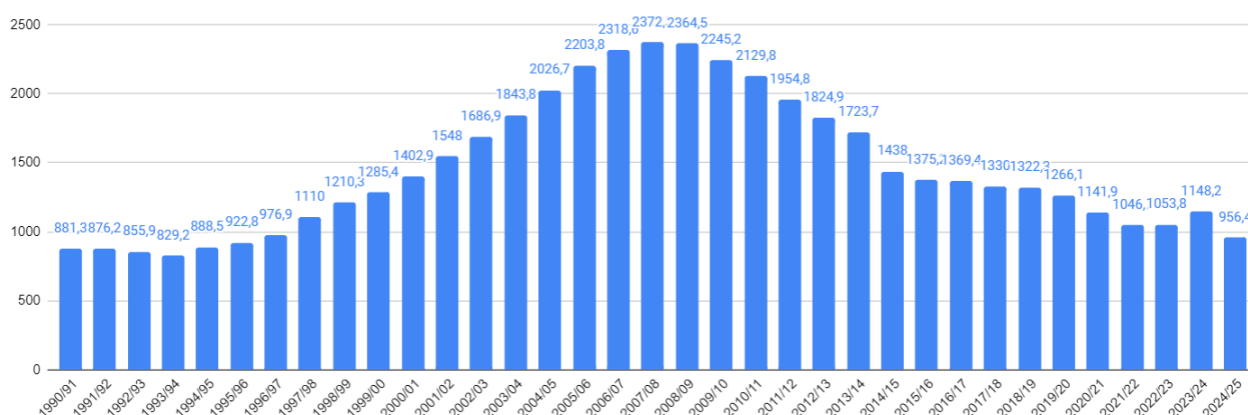
3.3 Accreditation system before 2019

The accreditation system in Ukraine was established in 1991 to provide state regulation of the educational services provision. The accreditation was conducted by the Ministry of Education and Science of Ukraine (MoES), was lacking of transparency and stakeholders' engagement. Regardless some attempts to transform the Ukrainian accreditation system in the beginning of 2000s, in particular the establishment of Accreditation Commission of Ukraine, the system still was not based on ESG 2005. This commission functioned under the Department of Licensing and Accreditation of MoES and was supervised by the Deputy Minister. Later in 2012 it was reorganised into the State Accreditation Commission of Ukraine chaired by the Minister, which still contradicted the principle of independent external QA.

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 old accreditation system (before 2019) used a summative model with its inherent strategy of unification of study programmes. The key role in the evaluation processes was played by the MoES. Accreditation was compulsory and perceived by universities as an inspection by a controlling institution with high corruption risks, but without providing recommendations on improvement.

In implementing the new accreditation system NAQA aimed to introduce a new philosophy of accreditation aligned to ESG 2015, with the intention to minimise the risks mentioned above, and to address the shortcomings that existed in the old accreditation system.

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 Board of the agency was elected in 2015, however, for a reason of legislative collision, it never started its official work. In December 2018, according to the amended Law of Ukraine "On Education", the new NAQA Board was selected by an International competition commission and formally approved by the Cabinet of Ministers of Ukraine. At the end of February 2019, NAQA formally commenced its activities and recruited NAQA Secretariat staff. NAQA milestones are presented in the Annex C.

4.2 Mission and Strategy

The initial mission of NAQA was to become a catalyst of positive changes in higher education and to shape its quality culture. Since the initial mission was successfully completed, in spring 2024 NAQA's mission was revised. NAQA's new and current mission is to ensure sustainability and consistency in enhancing the higher education quality culture and its security through effective partnerships with stakeholders. To support the new mission, NAQA has identified the following goals, values (see Figure 4) and principles (see Figure 5).

Figure 4. NAQA's strategic goals and values and principles

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.

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.

Figure 5. NAQA's principles

> **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.
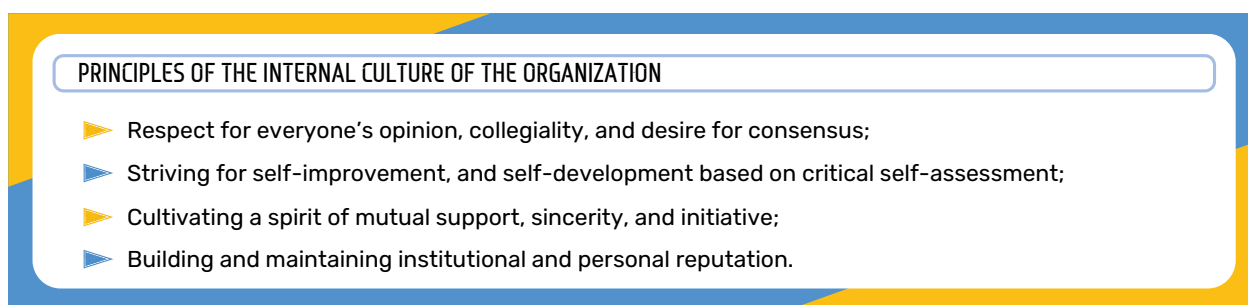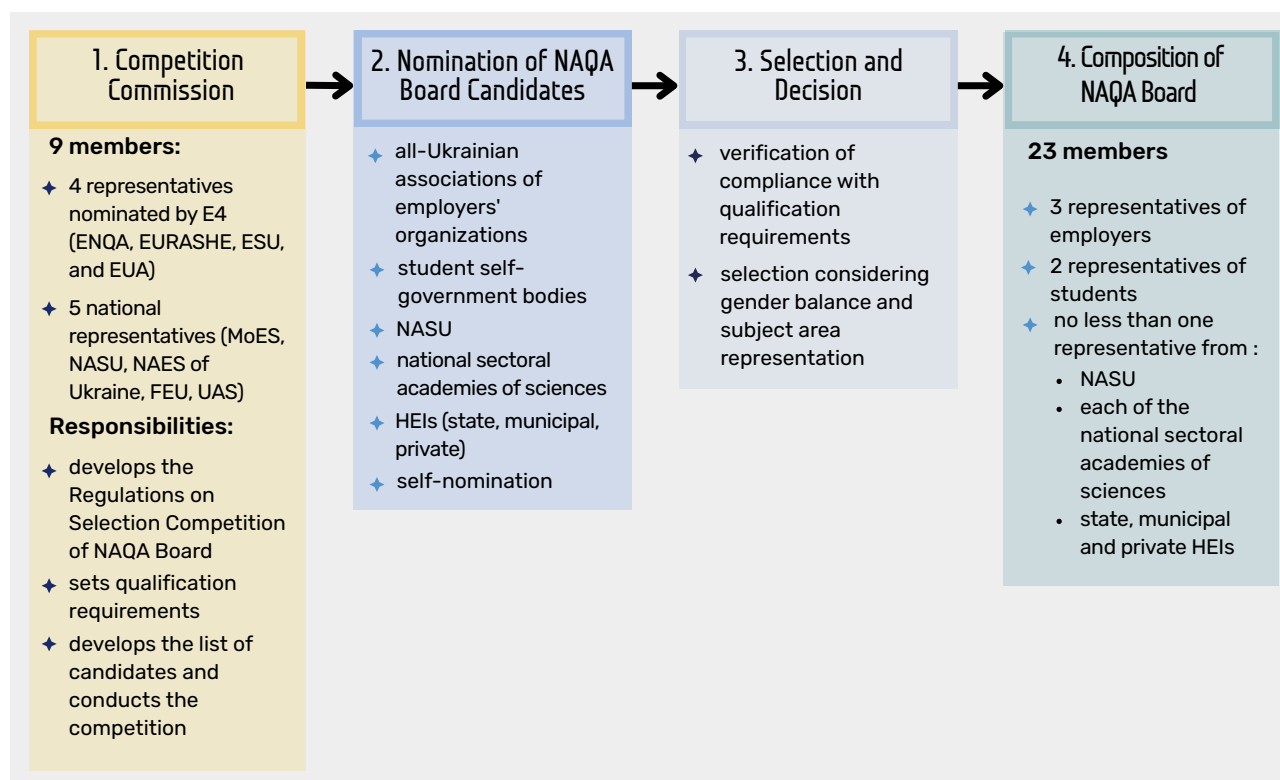
4.3 Organisational structure

Overall Structure

NAQA's Organisational Structure is available in the list of Annexes (Annex A).

NAQA Board

According to the Charter, NAQA Board consists of 23 persons who are selected by the International competition commission (consists of 9 members: 4 international representatives nominated by E4 (ENQA, EURASHE, ESU and EUA), 5 national representatives from: Ministry of Education and Science of Ukraine (MoES), National Academy of Science of Ukraine (NASU), National Academy of Educational Sciences of Ukraine (NAES), Federation of Employers of Ukraine (FEU), Ukrainian Association of Students (UAS)) based on the results of competitive selection, which is carried out in accordance with the principles of gender balance and subject area representation. The detailed procedure for NAQA Board members' selection is presented below (see Figure 6).

Figure 6. Procedure for NAQA Board members' selection

1. Competition Commission	2. Nomination of NAQA Board Candidates	3. Selection and Decision	4. Composition of NAQA Board
9 members: ✦ 4 representatives nominated by E4 (ENQA, EURASHE, ESU, and EUA) ✦ 5 national representatives (MoES, NASU, NAES of Ukraine, FEU, UAS) **Responsibilities:** ✦ develops the Regulations on Selection Competition of NAQA Board ✦ sets qualification requirements ✦ develops the list of candidates and conducts the competition	✦ all-Ukrainian associations of employers' organizations ✦ student self-government bodies ✦ NASU ✦ national sectoral academies of sciences ✦ HEIs (state, municipal, private) ✦ self-nomination	✦ verification of compliance with qualification requirements ✦ selection considering gender balance and subject area representation	**23 members** ✦ 3 representatives of employers ✦ 2 representatives of students ✦ no less than one representative from : • NASU • each of the national sectoral academies of sciences • state, municipal and private HEIs

The membership of NAQA Board 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, municipal 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. Due to the Martial Law the cadency of current Board was prolonged.

NAQA's Organisational Structure is available in the list of Annexes (Annex A. NAQA's Organisational Structure).

NAQA Committees and Bodies

There are 4 committees in NAQA, 2 of them consider issues related to accreditation: **Study Programme Accreditation Committee** 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; it also performs other functions assigned to it by NAQA. **Military Education Committee** 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. This Committee monitors and assures alignment of military training with both ESG 2015 and NATO principles and practices. For instance, the results of such monitoring are provided in the 2023 Quality Review (p.37). Additionally, 2 other committees, **Ethics Committee** and **Specialised Academic Council Committee**, perform other functions assigned to NAQA which are not in the scope of ESG 2015.

In accordance with the amendments to the Law on Higher Education, adopted on May 2, 2023, the independent Appeals Chamber is being established as part of NAQA. Officially, it started its work in November 2024. The main scope of Appeals Chamber activities is consideration of appeals and complaints 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 is a consultative body which consists of leading foreign 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. Advisory Board provides consultative support regarding the stakeholders' engagement, implementation of European QA standards, enhancing international cooperation, expert training and assessment, developing draft documents and procedures and external evaluation of NAQA activities relevant to study programme accreditation.

Organisational, financial, economic, logistical, information and other support for the activities of NAQA are provided by the Secretariat. Today, the structure of the Secretariat consists of 14 departments. In total, as as at January 2025 there are 59 staff units. Detailed description of the activities of the Structural Units of NAQA is presented in Annex B. Activities of the Structural Units of NAQA.

Study programme are evaluated by experts and SEC members selected and trained by NAQA. NAQA expert must have the necessary knowledge and expertise to allow them to effectively assess the quality of study programmes and educational activities of higher education

institutions and develop recommendations for study programme improvement. Experts are selected from among teaching staff and students.

SECs are permanent NAQA bodies consisting of 9 to 15 members including students, employers, international experts. SEC verifies expert panel reports, prepares SEC opinion on accreditation of study programmes and develops recommendations for HEIs on enhancement of study programmes.

4.4 Activities of the Agency within the scope of ESG

NAQA conducts systemic, comprehensive and consistent activities within the scope of ESG including:

Accreditation of Study Programmes

Currently NAQA conducts study programme accreditation on bachelor, master and PhD level. A number of study programmes accreditation procedures completed in 2019-2024 are presented in the Table 1 below:

Table 1. Study programmes accreditation procedures completed by NAQA in 2019-2024

	2019	2020	2021	2022	2023	2024
Accreditation	100	904	1642	778	1365	1064
Conditional	39	292	315	103	163	145
Denial	1	31	25	1	4	3
Exemplary	2	32	53	20	22	18
Total	142	1400	2040	904	1561	1230

QA Policies and Documents Development

The Regulations on Study Programmes Accreditation were developed by NAQA in 2019 and officially approved as per national legislation. All supporting documents and guidelines including self-assessment form were developed and made publicly available on the NAQA website. To fully comply with the ESG, NAQA developed new Regulations on Study Programmes Accreditation, which entered into force on August 1, 2024. Additionally, NAQA has developed guidelines and other documents, for instance Methodological guidelines "Clarifications on the Application of the Criteria for Assessing the Quality of Study Programmes". NAQA also develops proposals on improvement of national legislation regarding the HE QA. Development and launch of NAQA Information and Communication System (hereinafter ICS). This unique platform, created to digitalise document processing during the study programme accreditation procedure.

Selection, Training, Performance Evaluation of Experts Engaged in Study Programme Accreditation

NAQA systematically selects and trains independent experts, including academic staff and students (see Chapter 9, ESG Standard 2.4, p. 54), monitors the quality of their work (see Chapter 8, ESG Standard 3.6, p. 40), implements targeted professional development programmes, and develops guidelines for study programme accreditation.
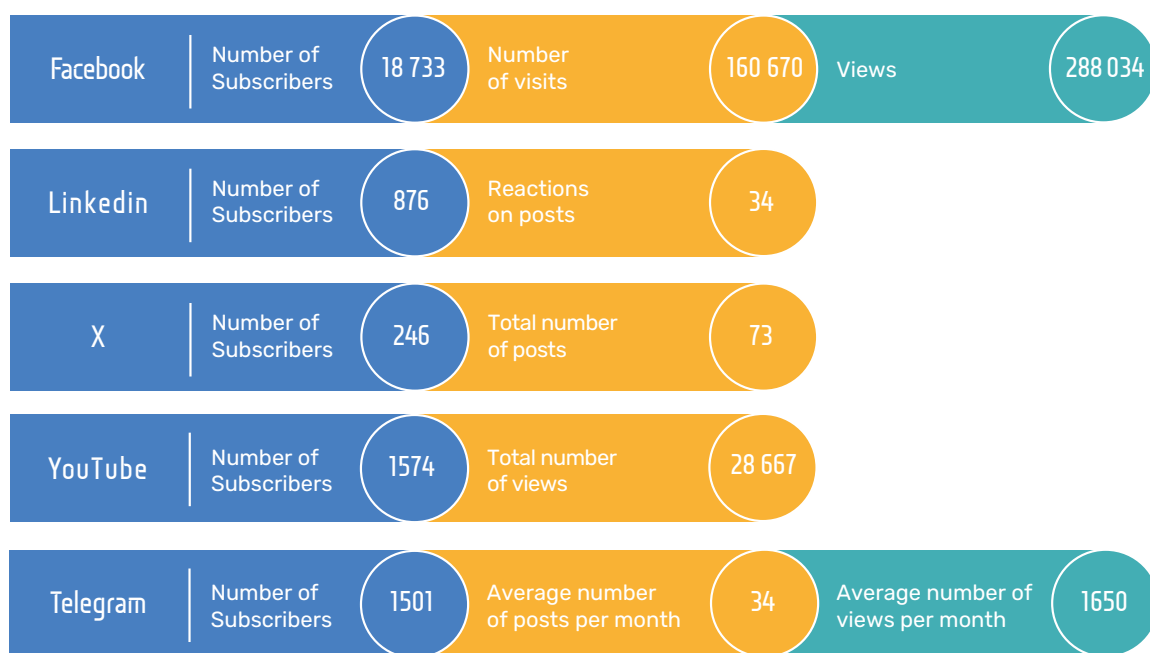
NAQA Self-Assessment

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.

Communications Activities (Public Relations)

NAQA Communication Strategy aims to provide information and clarifications to stakeholders through the trainings, seminars, round tables, meeting, using such communication platforms as NAQA's website and official Facebook, LinkedIn, X pages and Telegram and YouTube channel.

Figure 7. Social media coverage in 2024

| Facebook | Number of Subscribers | 18 733 | Number of visits | 160 670 | Views | 288 034 |

| Linkedin | Number of Subscribers | 876 | Reactions on posts | 34 |

| X | Number of Subscribers | 246 | Total number of posts | 73 |

| YouTube | Number of Subscribers | 1574 | Total number of views | 28 667 |

| Telegram | Number of Subscribers | 1501 | Average number of posts per month | 34 | Average number of views per month | 1650 |

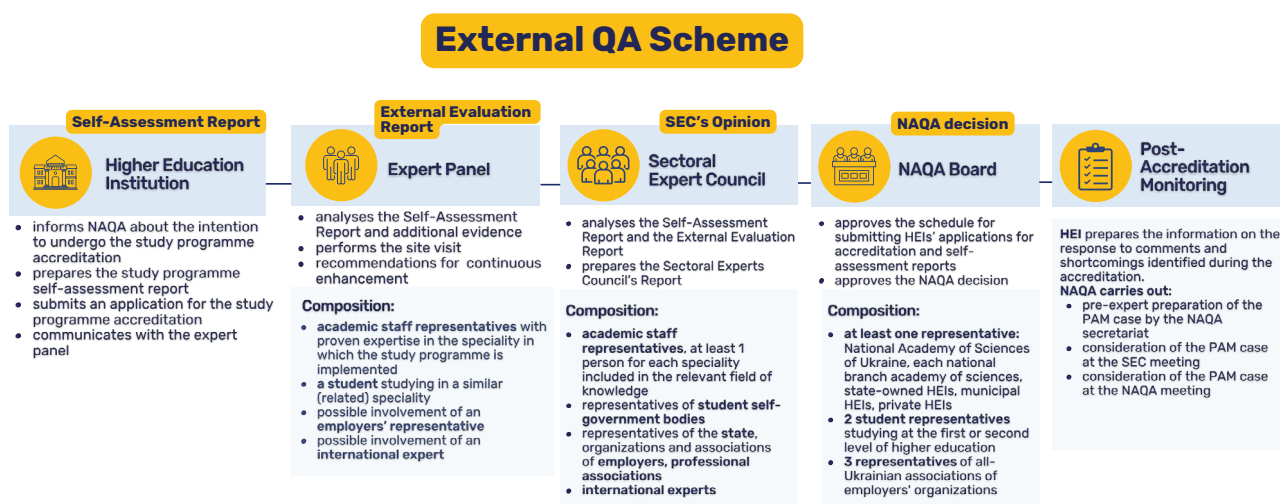Social media coverage in 2024 is presented on the Figure 7.

5. NAQA'S QUALITY ASSURANCE PROCESSES AND METHODOLOGY

NAQA has been carrying out 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

Study programme accreditation is conducted in accordance with the Regulations on Accreditation of Study Programmes which determines the basic principles, procedures and relevant criteria. The process of accreditation of study programmes is detailed in Chapter 9, ESG Standart 2.3, p. 51. The accreditation procedure is presented below in the Figure 8.

Figure 8. External QA Scheme

External QA Scheme

Self-Assessment Report	External Evaluation Report	SEC's Opinion	NAQA decision	
Higher Education Institution	**Expert Panel**	**Sectoral Expert Council**	**NAQA Board**	**Post-Accreditation Monitoring**
• informs NAQA about the intention to undergo the study programme accreditation • prepares the study programme self-assessment report • submits an application for the study programme accreditation • communicates with the expert panel	• analyses the Self-Assessment Report and additional evidence • performs the site visit • recommendations for continuous enhancement **Composition:** • **academic staff representatives** with proven expertise in the speciality in which the study programme is implemented • **a student** studying in a similar (related) speciality • possible involvement of an **employers' representative** • possible involvement of an **international expert**	• analyses the Self-Assessment Report and the External Evaluation Report • prepares the Sectoral Experts Council's Report **Composition:** • **academic staff representatives**, at least 1 person for each speciality included in the relevant field of knowledge • representatives of **student self-government bodies** • representatives of the **state**, organizations and associations of **employers, professional associations** • **international experts**	• approves the schedule for submitting HEIs' applications for accreditation and self-assessment reports • approves the NAQA decision **Composition:** • **at least one representative:** National Academy of Sciences of Ukraine, each national branch academy of sciences, state-owned HEIs, municipal HEIs, private HEIs • **2 student representatives** studying at the first or second level of higher education • **3 representatives** of all-Ukrainian associations of employers' organizations	**HEI** prepares the information on the response to comments and shortcomings identified during the accreditation. **NAQA carries out:** • pre-expert preparation of the PAM case by the NAQA secretariat • consideration of the PAM case at the SEC meeting • consideration of the PAM case at the NAQA meeting

Accreditation Criteria are presented on the Figure 9.

Figure 9. Accreditation Criteria

Accreditation Criteria

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 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

Criterion 8. Internal quality assurance of the study programme:

1. The higher education 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, analysing 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 education 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 education 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 assesses the existence of a quality assurance system in the HEI and its ability to provide timely response to identified drawbacks in the study programme, or educational activities for its implementation.

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

Accreditation During the COVID-19 Pandemic and Under Martial Law

Since the COVID-19 lockdown in March 2020 NAQA quickly switched its work to the online format. During the first two weeks of the nationwide quarantine, NAQA developed a Temporary order for conducting accreditation examination using video conferencing technology. In conditions of the COVID-19 pandemic, NAQA proactively started conducting accreditation remotely in spring 2020. This practice has been successful. The mandatory video recording of all online meetings, contributed to the greater objectivity in decision-making. Additionally, the new algorithms of interaction between NAQA's departments, recommendations and regulatory documents, public discussions and training of all participants of the accreditation process, were developed in the online format.

Due to the full scale invasion, a Temporary Accreditation Order for Study Programmes was approved, allowing for 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 Order for Study Programmes Under Martial Law,

approved by the decision of NAQA dated April 14, 2022 (Protocol No. 6(11)), and as an exception HEIs were allowed to undergo a procedure for one-year conditional accreditation with partial conducting of panel visit. This one-year conditional accreditation was an exceptional measure and response to the war conditions, currently this option is available only for HEIs facing emergency condition. In 2024 NAQA made 1307 decisions on one-year conditional accreditation under martial law.

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 are required to go through the full procedure with a face-to-face or hybrid site visit, except very extraordinary cases and security circumstances. A Commission for consideration of applications from 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 from HEIs for obtaining one-year conditional accreditation. The main factors forcing HEIs to apply for this procedure are in particular significant damage to the material and technical base caused by the war and/or 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.

NAQA bases its activities on the ESG 2015, principles of trust and mutual respect, aiming to disseminate them in the Ukrainian academic environment. These principles 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 a service function, implementing the paradigm of consultative evaluation and assisting HEIs in their pursuit of excellence, establishing a constant dialogue and fruitful cooperation.

6. NAQA'S INTERNAL QUALITY ASSURANCE PROCEDURES

The internal quality assurance system of NAQA is a set of organisational structures, procedures, policies and mechanisms that ensure that the agency's activities comply with its mission, strategic goals and the ESG.

NAQA is guided by the Regulations on the Quality Assurance System of NAQA Activities. The document determines NAQA's internal QA system its strategic, tactical and operational levels (see Figure 10), functions and procedures (Annex D). The Quality Assurance Policy of the National Agency for Higher Education Quality Assurance is based on the current legislation of Ukraine; international agreements and standards; NAQA's mission, values and principles of internal organisation, which are set out in NAQA's Strategy; gained experience, the principles and provisions of the Code of Academic Integrity. The main principles of NAQA quality assurance system are: ESG compliance, availability of sufficient and balanced resources for the implementation of external QA processes in higher education, NAQA's independence, evaluation of acquired experience and improvement of own activities, high professional standards and integrity, prevention of intolerance or discrimination, cooperation with stakeholders, informational security and availability, avoiding conflicts of interest, accountability, providing feedback and reflection mechanisms. The detailed information regarding NAQA's internal QA procedures are described in detail in Chapter 8, ESG Standard 3.6, p. 40.

Figure 10. Structure and responsibilities of NAQA QA system
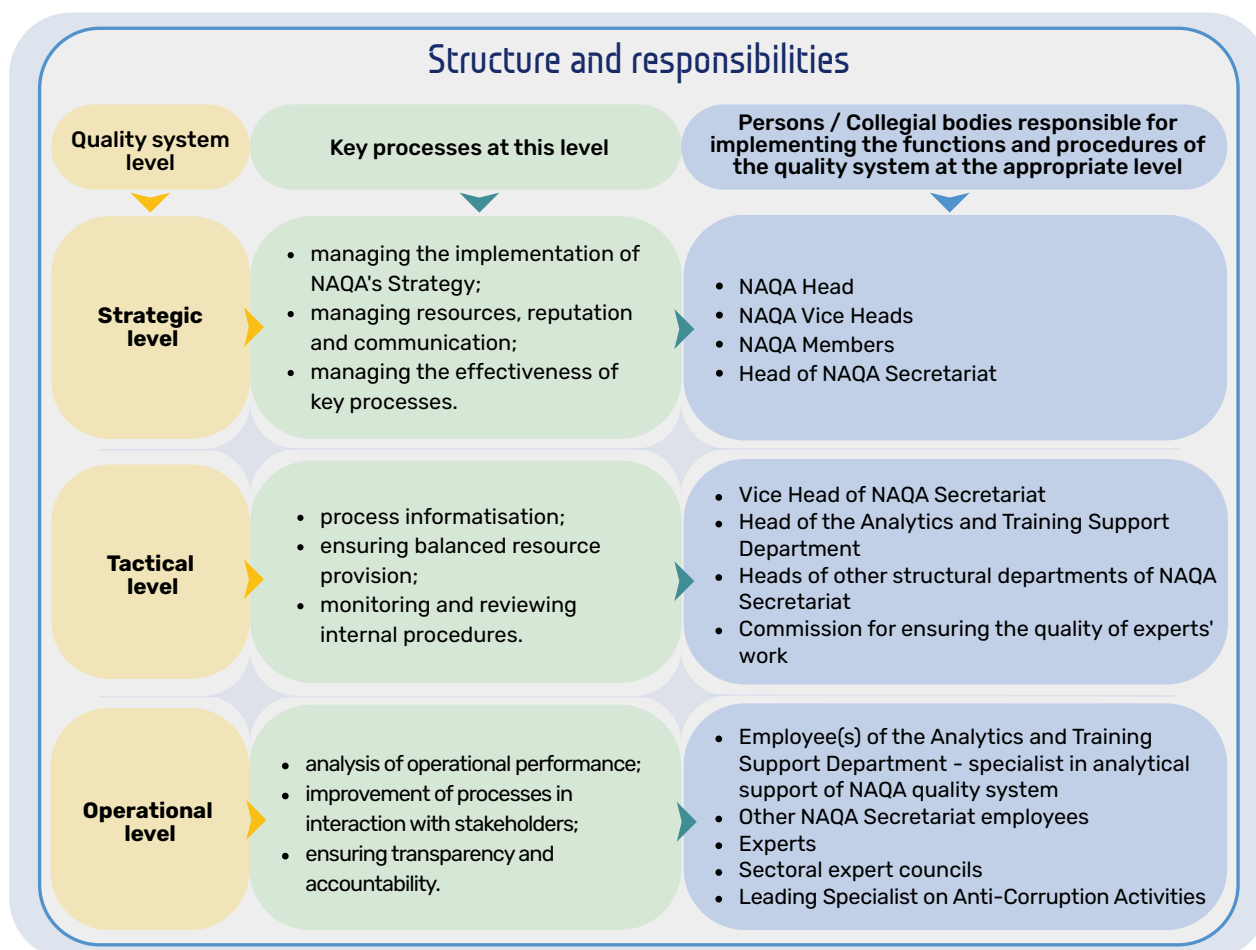
7. NAQA'S INTERNATIONAL ACTIVITIES

One of NAQA's strategic objectives is the internationalization of higher education in Ukraine and the activities of NAQA. The work towards this goal is conducted in a variety of ways.

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. NAQA has signed 15 memorandums of cooperation/understanding with European QA agencies. The result of such cooperation allows for extensive opportunities for the agencies involved, to exchange best practice in external quality assurance, develop joint initiatives in QA development, revise and improve key procedures and documents, develop new draft regulations and guidelines and benefit from the advice of international experts on the quality of higher education.

As an example of such successful partnership stemming from signing a memorandum is the cooperation between NAQA and Estonian Quality Agency for Education (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 implemented the Estonian-Ukrainian project, during which three Ukrainian universities are undergoing a full institutional accreditation procedure.

Membership in International Organisations

NAQA has set a goal to become a full member of ENQA and to be registered on EQAR. NAQA actively participates and presents its practices at all European QA events such as the European Quality Assurance Forum (EQAF), ENQA General Assembly, ENQA Members's Forum and other important QA events. In June 2020, NAQA was granted an affiliate status with ENQA, and it was prolonged in June 2025. In February 2020, NAQA gained full membership of INQAAHE (International Network for Quality Assurance Agencies in Higher Education). In July 2020, NAQA became a member of the International Center for Academic Integrity (ICAI). In addition, 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 a member of the European Network for Academic Integrity (ENAI) and in October 2022, NAQA received full membership of the 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 and its quality assurance. In particular, NAQA is a full partner of the Erasmus+ "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 has strong support from ENQA as project coordinator and project partners towards the National Agency's full membership of ENQA. The detailed information about each project is available in Annex L.

NAQA is involved in a number of other joint initiatives, such as within the cooperation with The Quality Assurance Agency for Higher Education (QAA) and the British Council. For example, the training conducted by leading experts of QAA for NAQA experts was conducted at the invitation of NAQA.

International collaboration allows NAQA to stay updated with the most recent and progressive QA practices, learn from more experienced QA agencies, share experience and ensure continuous improvement.

8. PROFILE, FUNCTIONING AND (EQA) ACTIVITIES OF THE AGENCY (COMPLIANCE WITH PART 3 OF THE ESG)

ESG Standard 3.1 Activities, policy and processes for quality assurance

Mission and How It Is Implemented in the Activities of NAQA

At the beginning of 2019, NAQA set its mission to "become a catalyst for positive change in higher education" (Strategy 2019-2023). NAQA aimed to reshape the perception of accreditation in HEIs, shifting it from a bureaucratic hurdle to an impactful enhancement tool. This transformation was achieved by promoting a culture of quality and collaborating with stakeholders through programme accreditation supported by seminars, training programmes, and the development of methodological materials for HEIs. NAQA launched various initiatives to support its mission including — the presentation of high successful practices, the organization of forums and online platforms for sharing experiences, and the "School of Quality" project which has emphasized the significance of accreditation in developing internal quality assurance systems. These initiatives promote the understanding of accreditation as a tool for growth rather than merely meeting formal requirements. All NAQA activities and strategic documents are freely available on the official website and other NAQA communication platforms.

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" (Annex E). This innovation maintained accreditation for study programmes, fully complying with legislative requirements, with online presence of experts.

In 2022, NAQA again showcased its resilience 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 members, 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. This dual focus — addressing immediate challenges while establishing a foundation for future growth — ensures that Ukrainian higher education remains resilient, aligns with EHEA standards, and actively prepares Ukrainian higher education for post-war recovery (Annex E)

The NAQA mission, updated in 2024, focuses on ensuring sustainability and consistency in enhancing the higher education quality culture and its security through effective stakeholder partnerships. NAQA's daily activities are guided by clearly defined strategic objectives outlined in the Strategy of NAQA to 2026 and cemented in The National Action Plan on Ukrainian external higher education quality assurance for 2024-2026. It includes:

- Consistently following the established programme accreditation procedure and reaching the acknowledgement of its compliance with the ESG by obtaining full membership in ENQA and being included in the EQAR (implemented through amendments to national legislation and the establishment of a comprehensive post-accreditation monitoring mechanism, as well as the creation of the Appeals Chamber, to ensure full compliance with the ESG);

- Enhancing the external quality assurance system for higher education, particularly by establishing a model for institutional accreditation and ensuring the operation of independent quality assessment agencies (implementing through pilot projects with

partner agencies, such as the "Enhancement of Higher Education Quality in Ukraine" project in cooperation with HAKA (Estonia);

- Promoting innovative practices in HEIs that enhance research, education, and business interplay (implementing through the criteria for evaluating the quality of study programmes (evaluation criteria), active engagement of the NAQA in the Ukrainian media, the systematic organization of events involving representatives from HEIs, businesses, public organizations, and government, along with the execution of joint projects).

NAQA shows adaptability and flexibility in executing its strategy by developing annual updates to its strategy implementation plans and action plans (Action Plan 2024-2026). NAQA members, with support from the Secretariat and its structural units, oversee the implementation of the strategy. This process allows for the consideration of current challenges, external changes, and emerging opportunities. NAQA's strategy is robust and responsive, promoting a culture of excellence in the quality assurance of higher education while adapting to a dynamic global environment.

NAQA strives to maintain a balance between compliance verification and the promotion of quality culture and implements:

- events on QA enhancement for various stakeholders, inc. HEIs;
- updated expert guidelines and trainings;
- structured expert reports and List of Major Drawbacks;
- thematic analysis of accreditation results;
- post-accreditation surveys among HEIs and experts (Annex F).

NAQA Activities within the Scope of the ESG — Programme Accreditation

Accreditation of a study programme is an evaluation process aimed at ensuring and enhancing the quality of higher education against identified Criteria. Accreditation of study programmes is conducted cyclically once per 5 years based on defined objectives, procedures, and guidelines available on the NAQA website. Since 2020, accreditation of study programmes has become mandatory as the requirement for regular accreditation of study programmes is explicitly mandated by the Law of Ukraine "On Higher Education" and Regulations on the Accreditation (Annex G).

Planning the NAQA activities for ensuring the accreditation procedure begins with creating a Schedule for accepting applications for the study programme accreditation. This Schedule is formed for each academic year based on notifications from HEIs regarding their notices of intent to seek accreditation for their study programmes. The Schedule is managed through NAQA's ICS and is available to the public. The progress of the accreditation process at each stage can be tracked in the NAQA ICS, specifically in the personal accounts of those involved in the accreditation process. Additionally, there is a live broadcast of NAQA meetings where the relevant accreditation cases are discussed. Annual reports of the Agency, published on the NAQA official website, contain detailed information about the number of conducted procedures, their periodicity, and results (Annex G).

Stakeholder Engagement

Stakeholder engagement is a cornerstone principle of NAQA. It 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. To guarantee transparency, openness, and the inclusion of diverse stakeholders (HEIs, student associations, employers, research institutions, and other

organisations), NAQA applies diverse mechanisms, including stakeholder representation in its composition and governance model, transparent decision-making, inclusive expert bodies, structured public dialogue, regular evaluation of effectiveness, and annual reporting to national and international bodies (see Table 2).

Table 2. Stakeholder engagement in NAQA's activities

№	Aspect of Governance	Description	Implementation Year / Source
1	Composition of NAQA	NAQA operates as a permanent collegial body of 23 members, representing academic communities, students, employers, and state authorities. Appointments are made via an open and transparent procedure.	Law of Ukraine "On Higher Education"
2	Stakeholder Representation in Governance	NAQA operates as a permanent collegial body. Decisions are made by a majority vote of its members, where all stakeholder representatives have equal decision-making rights.	NAQA Charter and Internal Regulations
3	Transparency and Publicity of Decisions	Key decisions, meeting minutes, and other information are published on the official NAQA website, ensuring open access for all stakeholders.	NAQA official website
4	Sectoral Expert Councils (SECs)	Include academic staff, students, employers, and international experts, enabling consideration of diverse stakeholder interests during evaluations.	SECs Regulations 2020–2024
5	Expert Panels	Each expert panel includes a mandatory student representative. Employers are represented based on nominations from employers, organisations, or professional associations.	Accreditation Procedures and Expert Panel Composition Internal Procedures
6	Public Dialogue	NAQA regularly engages with stakeholders through national and targeted sector events for HEIs, meetings with employee organisations, and joint training sessions on quality assurance for student associations.	Public Events 2020–2024, Annual Report
7	Evaluation of NAQA 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, etc.	Annual Reports, Quality Reviews, 2019–2024
8	Presentation of Annual Report and Quality Review to the Advisory Board	To ensure independent evaluations, international experts from the Advisory Board provide recommendations on strategic decisions and procedural improvements.	Advisory Board Meetings, 2022–2024
9	Presentation of Annual Report and Quality Review to Parliament	NAQA presents its performance results to the Education and Science Committee of the Verkhovna Rada (Parliament) of Ukraine each year ensuring public accountability and oversight.	Annual presentations 2020–2024

These mechanisms collectively ensure the active engagement of stakeholders in NAQA governance and decision-making processes and integrate diverse perspectives.

Distinguishing External Quality Assurance from Other Activities

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

- To prevent conflict of roles, NAQA has designated structural units for accreditation, distinct from its analytical, legal, and academic integrity activities.
- Internal regulations delineate processes to avoid functional overlaps.
- External QA procedures are funded through specific budget lines, clearly separated from the funding allocated for other activities. This prevents financial intermingling and reinforces operational independence.

Preventing and Resolving Conflict of Interest

NAQA takes a systematic approach to prevent and resolve conflicts of interest throughout the accreditation process. The basis for developing NAQA internal policies is the Law of Ukraine "On Prevention of Corruption". Consequently, the Regulations for Preventing and Resolving Conflicts of Interest have been developed, along with the approved NAQA Anti-Corruption Programme for 2025–2027. Internal regulations outline the appointment, replacement, or monitoring of experts, and mechanisms for disclosing conflicts among NAQA Board members.

Thus, NAQA 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

Legal Status of NAQA

The Law of Ukraine "On Higher Education" and the Charter of NAQA, approved by a resolution of the Cabinet of Ministers of Ukraine, define the legal status, tasks, functions, and powers of NAQA.

- Article 17 of the Law states that NAQA is a permanent collegial body; public law entity operating in accordance with this Law and the Charter approved by the Cabinet of Ministers of Ukraine.
- Part 1 of Article 18 establishes that accreditation of study programmes; conducting post-accreditation monitoring, analysis of the quality of HEIs activities are among NAQA's powers.

NAQA operates under the Constitution and laws of Ukraine, decrees of the President, 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 study programme accreditation results are officially recognized in Ukraine and have legal implications. Accreditation serves as a prerequisite for HEIs to award diplomas of higher education to their graduates, underscoring the mandatory nature of this process. Accreditation results are recognized by the state as a reliable source of data for decision-making. They are used in formulating public policy decisions, including the allocation of state funding for student training.

Moreover, according to the Licensing Conditions for Educational Activities, only accredited study programmes are allowed to enrol international students. This clause emphasizes the critical role of accreditation in sustaining the standards and global competitiveness of Ukrainian HEIs. Accreditation results are made publicly available through several platforms, including the USEDE, the official NAQA website, and the websites of the HEIs. HEIs applicants must be informed about the accreditation status of the study programme to ensure transparency and enable informed decision-making regarding their choice of institution.

NAQA plays an active role in shaping national higher education policy and initiating legislative changes. The Agency's expertise, analytical outputs, and accreditation results are regularly used to inform national decision-making and have led to concrete changes at the legislative level. NAQA's proposals and evidence-based recommendations are recognised by public authorities and reflected in official state decisions. In particular, NAQA has contributed to:

- Amendments to the Laws of Ukraine "On Education", "On Scientific and Scientific-Technical Activities" and "On Higher Education" (see, for instance, amendments 2021, 2023);
- The development of national principles and a unified procedure for awarding and revoking the Doctor of Philosophy degree (including the Procedure for Awarding the Doctor of Philosophy Degree and Revoking the Decision of a One-Time Specialized Academic Council);
- Improvements to the national framework for PhD training;
- Preparation of the Draft Law of Ukraine "On Academic Integrity";
- Design and implementation of the National Action Plans for External Quality Assurance of Higher Education in Ukraine (2022–2023 and 2024–2026).

In addition, NAQA actively participated in inter-institutional working groups to support the development of key national documents and reforms, for instance: The Concept for the Development of Legal Education, Methodological Guidelines for Developing Higher Education Standards, in collaboration with the Ministry of Education and Science of Ukraine, Transparency and Academic Integrity Guidelines, coordinated by the National Agency on Corruption Prevention (NACP), the framework for assigning professional qualifications, in cooperation with the National Qualifications Agency (NQA), development of legislative initiatives to ensure regulatory support for the functioning of corporate HEIs. NAQA also made substantial contributions to the revision of licensing conditions for HEIs, the implementation of recognition mechanisms for non-formal and informal learning outcomes, the development of regulations aligned with the European Approach to Quality Assurance of Joint Programmes, promotion of European integration through the advancement of ESG-aligned practices. This demonstrates that NAQA is not only implementing external quality assurance but also acts as a policy driver, with its decisions and analyses reflected in state-level legislation and national strategic planning.

In line with Part 2 of Article 18 of the Law "On Higher Education", NAQA annually develops and publishes on its official web-site a Review 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 reviews are widely discussed with stakeholders, and also sent to the Verkhovna Rada (Parliament) of Ukraine, the President of Ukraine, the Cabinet of Ministers of Ukraine.

Accreditation strengthens collaboration between universities and employers, facilitating regular exchanges of labour market information and fostering the creation of programmes aligned with market demands. NAQA actively collaborates with stakeholders to enhance the relevance and quality of study programmes in the respective fields. Notable examples include cooperation with the National Union of Journalists of Ukraine to align journalism programmes with industry standards and partnership with LLC "SoftServe Academy" to integrate cutting-edge IT training aligned with labour market demands.

The outcomes of external quality assurance serve as a foundation for strategic initiatives in higher education. These include increasing HEI funding, modernizing study programmes, introducing innovative teaching methodologies and reforming academic and administrative procedures.

Global Membership, International Collaboration and Recognition

NAQA is a full member of 4 international organizations dedicated to quality assurance and academic integrity: INQAAHE, CEENQA, GAIN, ENAI, and also associate to ENQA. 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 the National Erasmus+ Office in Ukraine, the British Council, OSCE, and USAID. NAQA is a partner in various Erasmus+ projects, including SEQA-ESG 2, SimS, EDUQAS, SmartPL, OPTIMA, DigiUni, CLOUD HED, UkraineDigiTrans, DOMANI. These projects significantly contribute to modernizing curricula, developing innovative teaching methods, and supporting the integration of Ukrainian HEIs into international standards. NAQA evaluates project effectiveness, allowing for strategic adjustments based on real-time results.

Thus, NAQA 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. Through collaboration with stakeholders, NAQA ensures that accreditation does not merely assess past achievements but becomes a catalyst for curriculum innovation, employability enhancement, and systemic institutional reform. External quality assurance results serve as a trigger for improving educational content, teaching methods, and student support systems.

ESG Standard 3.3 Independence

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:

- 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 Clause 1 of the Charter of NAQA.

- 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 Clause 5 of the NAQA Charter.
- 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 Clause 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 directly conflicted 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. NAQA has identified this challenge in SAR 2021. 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 eliminated 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.

The amendments clarified NAQA's role and ensured its operational independence and alignment with ESG 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 from the government, safeguarding its autonomy in decision-making and executing 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 that suggested subordination to state bodies were removed, aligning NAQA's activities with ESG standards and improving its reputation 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.

As outlined in the Paragraph 4.3 p. 13 Figure 6 independence of NAQA Board members is ensured by the fact of their selection by the international competition commission.

NAQA's independence is additionally strengthened through the Advisory Board composed of international experts, who provide external opinion and feedback on NAQA activities without any affiliation to Ukrainian governmental structures or HEIs.

Financial and Administrative Autonomy

NAQA acquires the status of a legal entity from the date of its state registration. It has an independent balance sheet, registration accounts in the Treasury bodies, foreign currency accounts in banks, and the official seal. This provision confirms the Agency's financial and administrative autonomy, enabling it to operate free from external influence.

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 formally approved by the Ministry of Education and Science. This is a standard technical procedure applied to all publicly funded

institutions to ensure the transparent and accountable use of state budget resources. It is important to emphasize that such approval is purely administrative and does not affect the substance or independence of the Agency's decisions. The primary funding sources for NAQA in 2024 are HEIs accreditation fees — 68% (see Table 5).

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.

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.

The agency ensures operational independence through several specific mechanisms, including legal autonomy, clear separation of roles, confidentiality policies, stakeholder feedback mechanisms, and internal risk-monitoring procedures. These mechanisms are designed to ensure impartiality, prevent external interference, and promote continuous improvement (Annex J).

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 panels, clearly defining policy for prevention of the conflict-of-interest; involving international experts from outside of Ukrainian HE system in SECs and expert panels since 2022; and conducting corruption risk analyses since 2020.

Independence of Formal Outcomes

The Agency ensures that expert conclusions, SEC opinions, and NAQA Board 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.** The selection of experts is conducted openly and publicly. Information on candidates, selection criteria, and procedures is published on the NAQA website. The outcomes of the selection process are documented in agency meeting protocols. The Register of Experts is regularly updated to reflect changes in status, professional affiliations, and publications. Study programmes are evaluated by experts without financial, professional, or personal ties to the HEIs being evaluated. NAQA aims for regional diversity in the composition of expert panels. The expert selection process also adheres to principles of non-discrimination and professional merit, ensuring that all nominations are reviewed objectively regardless of stakeholder origin. Experts must formally declare the absence of conflicts of interest in the Contract for conducting external evaluation (Clause 17). NAQA employs a database to track the connections and status of experts, verifying the absence of conflicts of interest. Such experts are removed from the Registry when undisclosed conflicts are identified.

2. **Evaluation by International Partners.** International experts from the Advisory Board regularly review the NAQA's Annual Reports and Reviews on the 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. 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.

3. **Mechanisms for Addressing Comments During Review.** NAQA has established transparent procedures for submitting comments by HEIs at various stages of the review process. These include responses to expert panel reports, feedback on draft conclusions by SEC, presentations by HEI representatives during council meetings. All submitted comments are thoroughly reviewed and considered. They may be taken into account only if they are supported by factual evidence. Accreditation decisions are adopted collectively by the NAQA Board, ensuring collegiality, objectivity, and institutional independence.

4. **Appeals Mechanisms.** NAQA decisions are made independently and no other body or HEI has the authority to overturn or amend the Agency's decisions. However, stakeholders may submit an appeal to the independent Appeals Chamber if they believe a decision requires further examination with the Agency's decisions have the right to apply to independent Appeals Chamber, ensuring the fairness, validity, and legality of those decisions.

5. **Transparency and Public Accessibility.** Accreditation outcomes, evaluation criteria, and agency decisions are made publicly accessible. All relevant documentation, including self-assessment reports, external evaluation reports, SEC opinion, 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.

Thus, NAQA responds to potential external pressures by ensuring transparent procedures, collective decision-making, and clear conflict of interest policies. External stakeholders may be involved in discussions, but final decisions are based on established criteria, peer review, and documented evidence. Regular internal reviews also help safeguard functional autonomy.

Thus, NAQA ensures compliance with ESG 3.3 through clearly defined organizational, operational, and independence of formal outcomes, which are legislatively enshrined and implemented via transparent procedures, engagement of independent experts, international partnerships, and robust appeal mechanisms. The organisational independence of the Agency is firmly enshrined in legislation. This independence is characterised by the absence of subordination to executive bodies, autonomy in management and legal capacity, and equitable interaction with other entities. This autonomy protects against political or administrative influence, ensuring its activities' objectivity, transparency, and credibility. NAQA's Charter guarantees its operational and decision-making independence, confirming that no external party, including the government, HEIs, or employers, may interfere with its procedures or outcomes. NAQA ensures transparency in the accreditation process, allows all stakeholders to familiarize themselves with the external evaluation results and decisions made, and responds to them by providing motivated comments and appeals. At the same time, the accreditation process restricts the ability of HEIs to influence the final decisions. Quality assurance outcomes remain fully under the jurisdiction of NAQA and are not subject to political, administrative, or institutional revision.

ESG Standard 3.4 Thematic analysis

Regular Analysis of Accreditation Outcomes

NAQA conducts regular (systematic) analysis of the outcomes of its external quality assurance activities. During the accreditation process, data are collected, categorized, and organized. The reliability of information sources is evaluated as part of the review process. Before analysis, all data undergo thorough checks for completeness and accuracy to maintain high standards

of reliability. The Accreditation ICS is used for data storage. Currently, data processing is performed using Excel, with plans to integrate advanced tools such as SPSS or Statistica.

Based on accreditation results, NAQA conducts and annually publishes the following analyses:

- **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.

- **Conditional accreditation trends.** Assessment of the outcomes of conditional accreditation for study programmes, particularly for those that have previously received such status, to evaluate HEIs' effectiveness in responding to identified major drawbacks. The analysis highlights which institutional practices were successful — and which were not — in addressing major drawbacks.

- **Accreditation decisions by foreign agencies.** Analysis of accreditation decisions made by foreign quality assurance agencies, categorized by higher education levels.

- **Cross-border quality assurance practices.** Identification of positive practices and challenges in cross-border quality assurance.

In August 2024, the Agency introduced a new evaluation tool — List of Major Drawbacks. It was developed based on the Criteria for Quality Assessment of the Study Programme, the ESG 2015, legislative requirements, and an analysis of accreditation conducted by NAQA from 2019 to July 2024. A major drawback is defined as one that violates legal requirements, hinders competency acquisition, or substantially impedes educational service provision. The List consists of 10 parts corresponding to NAQA's quality criteria. Expert panels and SECs indicate the presence or absence of each drawback and provide explanations in their reports.

Table 3. Key analytical dimensions in the thematic analysis of Major Drawbacks in study programmes

Frequency Analysis of Drawbacks	Identifies the most common major drawbacks, highlighting priority areas for intervention.
Criterion-Level Frequency Analysis	Assesses the frequency of drawbacks for each of the 10 quality criteria across all programmes and within subsets (e.g. conditionally accredited programmes).
Co-occurrence of Drawbacks Across Criteria	Identifies patterns where multiple drawbacks tend to be detected together, suggesting systemic issues.
Field-Specific Distribution	Examines drawbacks by academic fields (specialties), identifying issues specific to certain industries or disciplines.
Institutional Analysis	Analyses drawbacks at the level of individual HEI to uncover institutional problems.
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 forms of ownership (e.g., state, private, municipal), enabling tailored recommendations and interventions.

Analysis by Higher Education Level	Compares drawback frequency across Bachelor's, Master's, and PhD level to identify structural weaknesses.
Drawback Combination Patterns	Identifies typical combinations of drawbacks observed in the same programme, allowing for early risk profiling.

The implementation of List of Major Drawbacks has strengthened the objectivity and coherence of accreditation evaluations, enabling NAQA to shift from isolated case assessments to system-level diagnostics.

By applying a structured and qualitative analysis of accreditation data, NAQA identifies trends, uncovers root causes, and evaluates the impact of its recommendations. List of Major Drawbacks serves as a basis for national-level thematic analyses and supports evidence-based policy decisions, institutional improvement, and the advancement of higher education quality. These efforts are aligned with the National Action Plan for Quality Assurance of Higher Education in Ukraine (2024–2026).

NAQA also studies and systematises good practices in QA identified during the accreditation process. To support deeper exploration and raise awareness within the academic community, NAQA launched dedicated initiatives such as the School of Quality, SECs webinars, thematic workshops. These practices are also presented and discussed at the Ukrainian Quality Assurance Forum (UQAF-2023, UQAF-2024).

Based on the results of accreditation analyses, NAQA conducts dedicated thematic studies. For example, in 2020, following the analysis of 1,000 accreditation cases, a study titled "Academic Integrity in Ukrainian Higher Education Institutions" was conducted (see NAQA's 2020 Annual Report). The findings of this analysis highlighted the need for a more in-depth study, which was subsequently carried out within the framework of the Academic IQ project.

In addition, NAQA conducts targeted thematic and comparative studies, as well as short informational briefs, that provide insights into institutional and systemic challenges, support the refinement of national procedures, and contribute to informed policy decisions either independently or in collaboration with partners (see Table 4). The topics for these materials are driven by current challenges, such as the war and the COVID-19 pandemic, as well as the need to improve external quality assurance procedures and national qualification exams.

Table 4. List of thematic studies

№	Title	Description	Period	Impact
1	Comparative Study "Independent Institutions of Higher Education Quality Assessment"	A study focused on the experience of accreditation agencies in countries with established quality assurance traditions (e.g., UK, France, Germany, Spain, Turkey).	2024	Findings were used to develop proposals for a model of external quality assurance.
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"	A 2024 study exploring foreign practices of initial accreditation at institutional and programme levels in EHEA countries.	2024	Findings were used to develop proposals for a model of external quality assurance.

№	Title	Description	Period	Impact
3	Analytical Brief on the National Qualification Exam and the Use of Its Results during Accreditation	A brief summarising current practices of conducting the national qualification exam and proposing improvements to its content, structure, procedures, and use in accreditation.	2024	Conducted at the request of the Committee on Education, Science, and Innovation of the Verkhovna Rada; results presented at a Committee meeting and considered in its decision to improve the model for the Unified State Qualification Exam.
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 assessing changes in the quality assurance system under martial law and evaluating how educational institutions responded to the security situation.	2022-2023	Facilitated the development of proposals for organizing accreditation procedures during wartime and provided recommendations for institutions.
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, assessing changes in the quality of educational services since the start of the full-scale war.	2023	Facilitated the development of proposals for organizing accreditation procedures during wartime and provided recommendations for institutions.

In addition to the analysis of accreditation results and thematic or comparative studies, NAQA utilizes various other information sources to ensure comprehensive and reliable assessments:

- Data from electronic databases (e.g. USEDE). The USEDE data analysis covers:
  1) the distribution of HEIs by form of ownership, categories, regions, and city concentrations;
  2) student distribution by fields of study, education levels, funding sources, and regional representation; 3) the number of applications and entrants during admission campaigns, categorized by education levels; 4) the composition of academic staff; 5) the distribution of study programmes by educational levels. This analysis serves as a supplementary information source and a verification tool. This analysis holds independent significance, as no other organizations in Ukraine have conducted such a comprehensive review till December 2024.

- Open statistics and external reports, including data on HEIs from publicly available studies and reports by other organisations (e.g. results of the Unified State Qualification Exam, university rankings).

For each source type, specific criteria are established to ensure the relevance, accuracy, and reliability of the information used.

NAQA conducts analysis 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 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.

Development of a Four-Level Analytical Model

NAQA is advancing its analytical methodology by developing a four-level model: "data" — "methods" — "tools" — "conclusions and recommendations ." 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 & recommendations.

Dissemination of the Thematic 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.

- 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 ESG 2015, recommendations for justifying the drawbacks from List of Major Drawbacks. These clarifications aim to promote balance, transparency, and objectivity in evaluations.

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

- Annual Reports, covering 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, and recommendations for further improvement;

- Reviews on the Higher Education Quality 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 (identified through accreditation results), analysis of the agency's activities against ESG 2015, 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.

Practical Impact of Thematic Analysis Results

Thematic analysis results are actively used to support initiatives aimed at improving the quality of higher education and ensuring alignment with national legislation and the ESG standards. NAQA leverages these analytical findings to inform policy development, improve institutional and national quality assurance procedures, and inform international partners, including ENQA, particularly in cases of procedural violations (see Quality Reviews).

At the national level, NAQA uses thematic analysis to legislative drafting (see Chapter 8, ESG Standard 3.2, p. 25).

At the international level, thematic analysis has contributed to the proposal of a new procedure for recognising foreign QA agencies, whose accreditation certificates are accepted in Ukraine. This new approach is based on formal declarations of intent and confirmation of compliance with Ukrainian legislation and core EQAR principles.

At the institutional level, thematic analysis supports:
- Identification of risks by allowing HEIs to compare their practices with typical deficiencies by field of study, education level, and institutional type;
- Improvement of internal quality assurance systems through evidence-based reflection on trends and systemic challenges;
- Updating of internal regulations in response to common issues and their root causes;
- Planning of professional development activities, particularly for academic staff, focusing on key areas such as the formulation of learning outcomes, assessment practices, and alignment with higher education standards.

Among the most vivid examples of the practical impact of thematic analysis are the enhancement of student engagement, ensuring genuine student choice in elective courses, and deepening cooperation between HEIs and the labour market.

The results of the analysis also inform the refinement of NAQA's internal procedures, support post-accreditation monitoring, and are used to provide targeted institutional feedback. For instance, the Clarifications as well as training videos and online courses, experts training programmes, were based on analytical findings. These developments may be used by HEIs to improve the design and implementation of study programmes.

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 Presentation of Annual Report and Quality Review 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 analysis results into practice, ensuring 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 and forecasts, and improve policies in the education quality assurance field. To address these needs, a separate Analytics and Training Support Department was tasked with these responsibilities. The department's outcomes demonstrate the effectiveness of this decision. In 2024, the implementation of List of Major Drawbacks enabled structured in-depths analysis, 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 the study programmes' external evaluation.

ESG Standard 3.5 Resources

Human Resources

NAQA activities are managed by its Head and Vice Heads as well as Head of NAQA Secretariat who operate permanently to ensure consistent and effective leadership. The Secretariat manages organizational, financial, material, informational, and other resources for NAQA activities, ensuring effective operation of 15 structural units and maintaining coordination across the Agency's functions. The respective regulations clearly define each unit's responsibilities, ensuring no overlap and enhancing clarity in roles. The principles of accountability, transparency, and public trust guide all processes at NAQA. The efficiency of the NAQA Secretariat's structure is systematically evaluated and adjusted to address new challenges, legislative requirements, and strategic objectives. The organizational structure of NAQA is outlined in Annex B.

As of January 2025, NAQA employs 59 people, including 43 women and 16 men. NAQA independently hires its staff 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 overall staff remains 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 turnover rate is mainly caused by wartime conditions, but it is manageable, with suitable replacements promptly hired and no significant changes in the qualification composition of staff. Mechanisms for onboarding new employees and a mentoring system have been developed, enabling their quick integration and ensuring the stability of operational activities.

The Agency encounters challenges in building and maintaining its personnel structure: high standards (candidate requirements include relevant qualifications and experience in educational quality assurance), competition for talent (the private sector and international organisations often offer more attractive salaries, especially in fields like international cooperation, IT, and analytics), and a limited market of qualified personnel (the outflow of specialists from Ukraine due to the ongoing war is particularly significant). To address these challenges, NAQA offers professional development opportunities, flexible working conditions, and a supportive work environment. Achieving high standards requires effort, but it allows motivated individuals to enhance higher education in Ukraine as part of an impactful team.

The professional development of NAQA's Secretariat staff focuses on fostering continuous learning and skill enhancement through various educational and training opportunities: ongoing self-education, participation in international internships, training programmes, online learning, etc. Training topics address 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 (Review on the Quality of Higher Education for 2024 is in the process of publication).

As for May 2025, the Register of Experts includes 4885 individuals (4074 academic staff representatives and 811 students). The process for selecting experts to be included in the Register of Experts and the competitive selection of members for the SECs is described in detail in the section on compliance with Standard 2.4. The Agency ensures experts' continuous training and professional development to maintain high standards in external quality assurance activities. The evaluation of the expert's proficiency is described in the section on compliance with Standard 3.6.

Financial Resources

NAQA maintains robust and sustainable financial resources essential for its effective functioning. These resources support the Agency in conducting external quality assurance activities, developing internal processes, producing analytical reviews, and communicating transparently with stakeholders.

NAQA's funding comes from the Accreditation Fees, State Budget, Grants and Charitable Contributions (see Table 5).

Table 5. NAQA financial incomes for 2019-2024

	2019	2020	2021	2022	2023	2024
Accreditation fees	5547346,55 (20,03%)	29182922,62 (55,84%)	120207362,00 (75,16%)	53851257,31 (59,44%)	93854768,13 (74,07%)	81709432,22 (67,96%)
General State Budget	22109661,44 (79,82%)	21942943,39 (41,99%)	36865943,33 (23,05%)	35712922,98 (39,42%)	32415680,73 (25,58%)	38010287,59 (31,62%)
Grants and Charitable Contributions	43509,27 (0,16%)	1131734,09 (2,17%)	2856140,69 (1,79%)	1034807,71 (1,14%)	432692,85 (0,34%)	504799,72 (0,42%)
	27 700 517,26	52257600,10	159929446,02	90598988,00	126703141,71	120224519,53

The total amount of funding increased from UAH 27.7 million in 2019 to UAH 120.2 million in 2024, peaking in 2021 at nearly UAH 160 million before declining. Accreditation fees grew from UAH 5.5 million (20%) in 2019 to UAH 81.7 million (68%) in 2024. The highest amount was recorded in 2021 (UAH 120 million). Following a decrease in 2022, a partial recovery occurred. The share of this source became dominant, indicating increased financial autonomy of the Agency.

State budget funding remained relatively stable between UAH 22–38 million, but its share fell from 80% in 2019 to 32% in 2024, reflecting a gradual shift towards self-financing. Grants and charitable contributions made a minimal contribution (not exceeding 2%), with the highest amount recorded in 2021 (UAH 2.85 million). Thus, the Agency's financial model has evolved from relying primarily on state budget support to being predominantly funded through accreditation services.

Crucially, staff salaries and fixed operational costs are fully covered by the general budget. Therefore, the number of accreditations conducted does not affect staff income or influence decision-making. This financial structure helps ensure the objectivity and integrity of the Agency's QA procedures.

The Agency has demonstrated **financial stability and adaptability** 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.

The current funding model adequately supports the Agency's primary operations and facilitates the execution of all core functions. 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.

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 a rise in special fund revenues (there has been a notable increase in revenues from accreditation fees, which have been adjusted in response to changes in both budgetary indicators and policy frameworks).

NAQA actively seeks grant funding to enhance its financial resources, aimed explicitly at particular project-based objectives. Grant funding allows the Agency to explore innovative approaches and expand international cooperation. This approach ensures that grant projects provide valuable resources and opportunities for growth, while avoiding dependencies that could hinder the NAQA's core functions.

The Agency's financial resources are managed in strict accordance with Ukrainian budget legislation. This includes continuous monitoring of accreditation fee income, active communication with HEIs to ensure timely payments, and joint efforts with the legal department to secure the necessary documentation and maintain stable revenue streams. After each accreditation decision session, the expected special fund revenues are analysed. Payments to experts, SECs members, and NAQA members are calculated and earmarked, allowing for accurate planning and transparent allocation of the remaining resources based on operational needs and strategic priorities. In case of delays or disputes, NAQA undertakes organizational and legal measures to safeguard financial flows. This approach facilitates precise budget forecasting and enhances financial decision-making. Expenditures are strategically categorised to ensure operational efficiency and the fulfilment of the agency's mission.

NAQA is committed to the highest standards of transparency in its financial activities. The Agency consistently publishes its financial reports on its official website, ensuring that all stakeholders have immediate access to detailed information about how funds are allocated and utilized.

Additionally, financial activities are disclosed on the E-data portal, Ukraine's official open data resource for tracking the use of budget funds. NAQA implements stringent controls over fund usage to ensure financial **transparency and accountability**. Internal reviews are conducted regularly to evaluate the agency's financial operations, focusing on enhancing efficiency and preventing potential mismanagement. Financial audits conducted by the State Audit Service in 2021 and 2024 confirmed full compliance with legislation and effective resource management.

Equipment and Software

NAQA uses modern equipment and software to support its operations, ensure transparency, and maintain continuity even in crisis situations.

NAQA ensures reliable operations through modern infrastructure, secure data management, and digital solutions (see Table 6).

Table 6. NAQA IT equipment and software

Technical Infrastructure	Cloud servers support secure data storage, backups, and web services. UPS systems maintain functionality during power outages. Equipment needs are reviewed and procured annually.
Technical Infrastructure: Software and Systems	Core tools include Windows, Office 365, and the ASKOD system. The *LMS_experts* platform manages expert databases; *NAQA.Svr* supports PhD award transparency.
Information and Communication System (ICS)	A key innovation that automates all stages of accreditation and ensures transparent communication with HEIs, experts, and SECs.
Personal Data Protection and Data Security	NAQA prioritizes the protection of data security at all stages of processing and implements legal, organizational, and technical safeguards to prevent loss, destruction, leakage, or unlawful access. These measures are outlined in Action Plan for responding to data-related incidents and are aligned with the Law of Ukraine "On Personal Data Protection". To ensure information security, particularly within the Information ICS: all ICS data is regularly archived; information is stored on protected servers; ICS administration is restricted to a select group of authorized employees, two-factor authentication is implemented. All employees are systematically informed about information security measures and undergo training.

NAQA applies a comprehensive framework for protecting the personal data of all individuals whose information is processed, including: secretariat staff and Agency members; experts and expert candidates; members of Sectoral Expert Councils and the Appeals Chamber; contractors and service providers (under civil or commercial contracts). These measures are formalized in contracts, internal regulations, Declaration on Integrity and instructions, and are regularly reviewed and updated. A designated Data Protection officer oversees the implementation of these policies and ensures regulatory compliance. This integrated approach ensures the confidentiality, integrity, and availability of personal data across all NAQA operations. |

	A recent independent assessment verified that NAQA fully complies with the national legislation on personal data protection. The results confirmed the effectiveness of the Agency's legal and procedural framework, with no deficiencies identified.

In accordance with the national legislation, NAQA publishes justifications for the technical and quality characteristics of the procurement subject, its expected cost, and budget allocation size. Information about the Agency's procurement plans and completed purchases can be found on the ProZorro web portal. An annual inventory of material resources is conducted within set deadlines, with three inventories scheduled for 2024, demonstrating a strong level of oversight on the base's condition.

NAQA has maintained operational continuity even under extreme conditions, including the COVID-19 pandemic and war. The agency pioneered remote and hybrid accreditation formats in 2020, demonstrating resilience and commitment to sustaining quality assurance without disruption.

Therefore, NAQA effectively manages its financial, human, and material resources to ensure that its activities, particularly the programme accreditation, align with ESG standards. The Secretariat's organizational structure is fundamentally geared for the successful execution of all NAQA activities. The employees effectively coordinate these processes, ensuring the best possible outcomes at every step. Diversifying funding sources guarantee the independence of the accreditation process and supports stable operations. Substantial control over funds' use ensures financial transparency and accountability for NAQA. 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 maintain operational continuity, NAQA implements contingency plans and demonstrates resilience in responding to emergencies. Information from the ICS is stored in external resources to ensure reliable protection and accessibility. As a result, NAQA has maintained continuity in its activities even in the most challenging conditions, providing stability and high quality in its functions.

ESG Standard 3.6 Internal quality assurance and professional conduct

NAQA strictly implements an internal quality assurance (IQA) policy that complies with the requirements of ESG Standard 3.6. This policy underscores high professional standards, ethical conduct, transparency, accountability, and continual improvement. The measures under this policy aim to maintain stakeholder trust, improve process efficiency, and ensure adherence to ESG 2015.

Policy Framework and Strategic Alignment

NAQA Quality Assurance Policy is a pivotal document that regulates the essential aspects of the agency's quality assurance activities. The main principles and objectives of the policy are based on the current legislation of Ukraine, ESG 2015, the mission, values, and principles of internal organization laid out in the Strategy of NAQA, and the principles and provisions of NAQA's Code of Academic Integrity. In December 2024, the Policy was updated to align with the NAQA's new strategic goals, enhance management practices, safeguard rights, and strengthen accountability. The operational framework is outlined in the "Regulations on the Quality Assurance System of NAQA Activities". The IQA system is structured across three levels: Strategic, Tactical, and Operational. Its implementation follows the PDCA (Plan–Do–Check–Act) cycle. The structure, roles, and responsibilities at each level are presented in Annex D. The Annex K

provides examples from 2023–2024 that demonstrate how NAQA applies this continuous improvement approach in practice. All processes explicitly guard against discrimination or intolerance, in line with national and EU anti-discrimination legislation.

Culture of Self-Assessment and Continuous Improvement

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 and responsibilities that are clearly defined among NAQA Board members, NAQA staff, the secretariat's structural units, and SECs, experts.

- Continuous monitoring of NAQA activities through regular meetings, comprehensive reports, and detailed analyses of effectiveness and outcomes. Ongoing financial monitoring ensures that resources are used efficiently and aligned with strategic goals, enhancing accountability and financial integrity.

- Preparation of a Self-Assessment Report based on ENQA and EQAR recommendations allows NAQA to evaluate its compliance with ESG 2015 and identify areas for improvement. Since 2020, NAQA has conducted annual ESG-based self-assessments. The first comprehensive Self-Assessment Report was prepared in 2020, and from 2021 onward, ESG self-assessment has been integrated into NAQA's annual Quality Reports.

- NAQA reviews its quality assurance processes annually to identify areas for improvement and ensure alignment with IQA standards.

Feedback Mechanisms

NAQA has developed comprehensive internal and external feedback loops. For example:

— External: HEIs provide feedback after each site visit, and experts complete post-evaluation surveys. These insights inform expert panel composition, training content, and procedural updates. Members of SECs provided structured feedback following the post-accreditation monitoring improving pilot. Their insights were used to improve monitoring procedures and refine follow-up mechanisms.

— Internal: weekly leadership meetings, departmental discussions, employee surveys, informal communication, and a mechanism for staff suggestions. These inputs guide strategic and operational planning.

Monitoring and self-assessment activities have led to important improvements, for instance: clarification of the Agency's official status; the revision of accreditation procedures and the adoption of the new Accreditation Regulation (2024); the establishment of the Appeals Chamber (2024) as a replacement for the Committee; improvements in the post-accreditation monitoring process; the introduction of List of Major Drawbacks as an evaluation tool; the introduction of the updated structure for expert reports and SEC conclusions; the Regulations on Experts and Expert Panels (2024); the implementation of the Committee for Reviewing HEI Requests (2024) and the Commission on Expert Performance Evaluation (2023). In response to emerging needs, periodic restructuring of the Secretariat and clarification of staff roles and responsibilities continue to enhance efficiency and accountability.

The self-assessment activities not only drive improvements in policy and procedures but also inform evidence-based decisions. For example, NAQA systematically analyses correlations between compliance levels at different accreditation stages (expert reports, SEC opinions, and final NAQA decisions) to enhance the consistency of decision-making.

Ensuring Accountability to Stakeholders

NAQA is deeply committed to maintaining a high level of accountability to all its stakeholders.

The Agency annually prepares, publishes, presents NAQA Quality Reviews and the Annual Reports on its own activities. The official website publishes reports on financial operations, procurement plans, and completed procurement details.

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 Instruction on the procedure for ensuring access to public information at NAQA. NAQA has established clear procedures for access to public information and citizen appeals, ensuring transparency and timely responses.

Competence, Professionalism, and Ethical Conduct of Individuals Involved in the NAQA Activities

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

- Considers professional skills, competency, and reputational qualities when selecting experts and hiring staff for the NAQA Secretariat.
- Organizes seminars, training sessions, and webinars for experts to improve their qualifications and skills while continuously developing methodological materials.
- Encourages the sharing of best practices in higher education quality assurance.
- Conducts ongoing internal monitoring of accreditation quality and ethical behaviour.
- Ensures that all Board members, experts, Secretariat staff, and other individuals involved in its operations comply with the Declaration of Academic Integrity. It actively promotes the NAQA Code of Academic Integrity for Higher Education Quality Assurance, strengthening the commitment to ethical practices across the agency.

Monitoring of Staff Performance

The Secretariat staff's competence, professionalism, and quality of work are regularly assessed by unit heads. Analysis considers task completion, output quality, and alignment with objectives. New staff undergo probation with mentoring. As part of the systematic evaluation process, NAQA conducts targeted knowledge assessments. For example, in 2023, staff completed a test on higher education legislation, and in 2025 — on anti-corruption regulations. The results of staff monitoring are used to ensure quality control and improve internal processes, adjust training programmes to address identified needs, develop internal control mechanisms and analytical tools. This systematic approach not only upholds NAQA's standards but also facilitates staff development and helps identify areas requiring targeted improvement or capacity-building initiatives, and informs the design and implementation of Staff Development Plans.

NAQA has developed a robust, multi-level system for evaluating experts as an element of its IQA. Feedback is systematically collected from HEIs after each site visit and through expert surveys. In addition, a dedicated Commission, established in 2023, reviews the quality of expert reports following NAQA Board decisions and investigates potential violations. As a result, in 2024, 116 experts were removed from the Register and 200 referred for remedial training. NAQA also conducts annual expert performance reviews, combining data from multiple sources to inform improvements in training, procedures, and expert panel composition. In 2024, the performance of 2,075 experts was evaluated based on procedural compliance, report quality, and stakeholder feedback.

Integrity and Ethical Behaviour

NAQA's Code of Academic Integrity establishes globally accepted standards for professional

conduct for all individuals involved in the Agency's activities. The Code ensures strict adherence to a zero-tolerance policy towards violations of academic integrity and ethics principles. The Code outlines key values of academic integrity and ethics: integrity, honesty, truthfulness, transparency, legality, respect, trust, advocacy for dignified behaviour, and upholding academic principles under pressure. Promoting tolerance and non-discrimination in its operations and decision-making NAQA strictly prohibits the collection and processing of personal data that may disclose sensitive aspects of an individual's private life.

Anti-Corruption Measures and Conflict of Interest Prevention Mechanisms

In 2020, NAQA launched its Anti-Corruption Programme for 2020-2021 to minimize corruption risks and promote transparency, accountability, and integrity in its activities. The Programme outlined protocols for managing conflicts of interest among Board members, Secretariat employees, SECs members and experts. It emphasized anti-corruption measures, professional ethics, and the rights and responsibilities of those involved in the accreditation process. The program also established procedures for oversight, effectiveness evaluation, protections for whistleblowers, training, disciplinary measures, and internal investigations. Mandatory compliance with the Programme is outlined in NAQA's internal labour regulations and job descriptions.

The Anti-Corruption Programme was updated for 2022-2024 (in 2022) and 2025-2027 (in 2025). Developing the Anti-Corruption Programme involves analyzing past corruption risk assessments, the effectiveness of current measures, and creating briefs for NAQA functions to identify areas vulnerable to corruption. Reports on the results of the Anti-Corruption Programme for each respective period are publicly available on the agency's official website.

Regularly NAQA IQA is analysed by Advisory Board, resulting in their recommendations for further improvement.

Thus, NAQA actively and continuously works to enhance its processes and improve its IQA system, maintaining a high level of operational quality. These efforts align with ESG Standard 3.6. NAQA is dedicated to fostering trust among stakeholders and Ukrainian society through transparency and accountability. IQA mechanisms are integral to NAQA's strategic management. The NAQA internal policies outline the criteria for selecting personnel and engaging experts based on their relevant expertise and strong moral character. They provide ongoing professional development tailored to identified needs. 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 impacts decision-making. Regular communication with stakeholders enables NAQA to effectively plan and implement measures to enhance internal processes and monitor performance quality by NAQA experts and employees. Through implementing comprehensive measures and adherence to internal integrity and professional ethics policies, NAQA has established itself as a guarantor of quality higher education in Ukraine.

ESG Standard 3.7 Cyclical external review of agencies

Standard 3.7 requires agencies to undergo external review at least once every five years to confirm their compliance with ESG 2015. 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 2015, 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 launch 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, 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 stakeholders and external experts became the basis for the development of the National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 period. This plan laid out specific measures to improve processes and ensure compliance with ESG 2015.

2. "Independence Indicators of Quality Assurance Agencies" conducted by SQAA (Slovenia) and CEENQA on the NAQA's request to analyse the level of autonomy on different levels.

3. Participation in the ERASMUS+ SEQA-ESG 2 project (2022–2025). In 2022, NAQA joined the ERASMUS+ SEQA-ESG 2 project, coordinated by ENQA. The project supports agencies in achieving compliance with ESG 2015. 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 2015 (Annexes R, S).

   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 and EQAR 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;
   - Optimization of NAQA's legal status, ensuring compliance with Standard 3.2;
   - Enhancing expert training systems and improving monitoring procedures for quality assessments;
   - Improving appeals and complaints procedures through establishing independent Appeals Chamber.

   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.

4. Annual self-assessment of ESG 2015 compliance in the "Quality Review". Every year, NAQA conducts a self-assessment and reports on the implementation of ESG 2015 in the "Quality Review", ensuring transparency and accessibility while allowing for the prompt adjustment of strategies based on feedback received.

5. 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 "Quality

Review" 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.

6. Assessment of agency practices through participation in projects. NAQA actively shares its experiences by participating in international training, seminars, and projects, offering external evaluation opportunities. For instance, NAQA's expert training system has attracted substantial interest among foreign colleagues, e.g. UKA, HAKA, NEAQA. Following SEQA-ESG 2 project, representatives of the Serbian accreditation agency also reached out to NAQA, expressing interest in its expert training model.

7. 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 2015, ensuring institutional resilience, and adapting accreditation procedures during the martial law period. 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.

8. NAQA's financial activities have undergone two audits by the State Audit Service of Ukraine — in 2021 and 2024. Both audits confirmed full compliance with national financial legislation. These external reviews initiated by NAQA reinforce its commitment to transparency, accountability, and the efficient use of public funds.

9. A recent independent assessment verified that NAQA fully complies with the national legislation on personal data protection. The results confirmed the effectiveness of the Agency's legal and procedural framework, with no deficiencies identified.

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 2015.

9. DESIGN AND IMPLEMENTATION OF THE AGENCY'S EQA ACTIVITIES (COMPLIANCE WITH PART 2 OF THE ESG)

ESG Standard 2.1 Consideration of internal quality assurance

The methodology used by NAQA for external quality assurance of higher education was designed following the ESG 2015, acknowledging the HEI's responsibility for the quality of their study programmes. In 2014, the starting point for the major reform of higher education quality assurance in Ukraine was adopting the Law of Ukraine on Higher Education. For the first time, the Ukrainian legal framework has introduced regulations requiring procedures for ensuring the quality of higher education to follow the Standards and Guidelines for quality assurance in the EHEA (Sec. 3, Art. 16 of the Law of Ukraine "On Higher Education").

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, (version 2019) (ref. N 686 dated 15.05.2024). The Law of Ukraine on Higher Education, Article 18, explicitly grants NAQA the authority to develop regulations and methodologies for accreditation. The programme accreditation is applied for study programmes that are implemented in all types of HEIs.

For NAQA, it was of primary importance that the criteria for evaluating study programmes support the improvement of HEIs' internal quality assurance. Therefore, the established criteria consider the standards and guidelines for internal quality assurance, as outlined in Part 1 of the ESG (Annex N. Mapping of the NAQA study programme accreditation criteria with ESG 2015, part 1).

> **ESG 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 (SC 8.8) and well-defined processes for the development, approval, monitoring, and periodic evaluation of the study programme (SC 8.1). HEIs should indicate that their quality assurance system is responsive to drawbacks identified (SC 8.5) and recommendations post external quality assurance (SC 8.6). Quality assurance policies and procedures for study programme development and periodic review should involve students (SC 8.2) and employers (SC 8.3) and take into account information about the career path of graduates (SC 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 (SCs 5.4, 10.7).

> **ESG 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 (SC 1.1). It must go through an official approval process within the institution (SC 1.1), have a well-defined objective aligned with the university's mission and strategy (SC 1.3), and include clear learning goals (SC 1.1). Study programmes should be designed with consideration of the needs of interested parties (SC 1.4), benefiting from external expertise (SC 1.5), and encompassing both theoretical knowledge and adaptable skills (SC 2.2 and 2.6). It should facilitate student progressing (SC 2.2), establish the anticipated student workload in ECTS credits (SC 2.1 and 2.7), and incorporate structured internship opportunities (SC 2.5). The qualification resulting from a programme should be specified and communicated (SCs 1.1, 1.2) and refer to the correct level of the National Qualifications Framework (SC 5.2).

ESG 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 (SC 8.2) and the improvement of the learning process (SCs 4.1, 4.3, 4.5). Student-centred learning and teaching (SC 4.1), inquiry-based learning (SCs 4.3, 10.1, 10.4), flexible learning paths (SC 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 (SC 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 (SC 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 (SC 5.1).

ESG 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 (SCs 3.1 and 3.2), progression (SCs 4.2, 5.1 and 5.3), certification (SC 5.2), and recognition, including the recognition of higher education qualifications (SC 3.3), non-formal and informal learning (SC 3.4).

ESG 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 (disciplines) (SC 6.1); the openness and nondiscrimination of the process for the teaching staff recruitment (SC 6.2); created opportunities for the professional development of teaching staff, particularly in the area of teaching skills development (SC 6.4); and the participation of employer representatives in the educational process (SC 6.3).

ESG 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 recourses and teaching materials (SC 7.1), to which teachers and students have access (SC 7.2); the safety of the learning environment for students' physical and mental health (SC 7.3); the provision of educational, organizational, informational, advisory, and social support for students (SC 7.4, 4.4); the establishment of conditions for the realization of the right to education for those with special educational needs (SC 7.5); anti-corruption policies and conflict resolution procedures (SC 7.6).

ESG 1.7 Information management. The established evaluation criteria encourage HEIs to create an efficient stakeholders' feedback system, e.g. employers (SC 8.3), students (SCs 4.1; 8.2) and staff (SC 8.1), monitor graduates' career paths (SC 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 identified (SC 8.5).

ESG 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 (SC 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 (SC 9.3).

ESG 1.9 On-going monitoring and periodic review of programmes. Criterion 8 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 programme regularly (SC 8.1). It also involves employers (SC 8.3), students (SC 8.2), and graduates (SC 8.4). It considers the outcomes of external quality assurance (SC 8.6) and consistent monitoring (SC 8.5) when implementing internal quality assurance procedures. The established procedures should facilitate a culture of quality in HEI (SC 8.7).

> **ESG 1.10 Cyclical external quality assurance.** In Ukraine, cyclical external quality assurance (every 5 years) 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. For example, an analytical report, "Development of the internal quality assurance system in Ukrainian HEIs" (2020) shows that 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.

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 research projects, annual Quality Reviews, etc. It has been collaborating on projects such as ERASMUS+ EDUQAS, developing recommendations for implementing institutional quality assurance systems and actively interacting with HEIs to disseminate information and providing advisory support to HEIs (e.g. the "Recommendations regarding the organization of the internal system for quality assurance of study programmes and educational activities"). As of January 2025 422 HEIs have undergone NAQA study programme accreditation at least once. All study programme accreditation cases (as of July 2025 12,371 cases) including all its stages are available in ICS, as an example case ID 51171.

To address the challenge of emerging HEIs internal QA systems, 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 (e.g. 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 serves as a platform for HEI and educational organization presentations, showcasing best practices for developing the internal quality assurance system in higher education.

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 correlation 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 was what drove its genuine development. Consequently, while implementing the accreditation 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.

ESG Standard 2.2 Designing methodologies fit for purpose

NAQA carries out cyclic accreditation of bachelor, master, and doctoral study programmes. The accreditation 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 following accreditations are carried out during the last year of the accreditation certificate validity. HEI has the right to initiate the following accreditation ahead of time.

Methodological Framework

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

Aiming to foster a quality culture within the Ukrainian higher education system, NAQA accreditation has the following objectives: to identify the study programme's compliance with the established criteria; to assist HEIs in identifying strengths and weaknesses of their policies and activities and promote continuous quality enhancement; to provide stakeholders with objective information about the study programme quality; to enhance trust in higher education in Ukraine; and to encourage the integration of Ukrainian 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 to the HEI to clarify the facts indicated in the self-assessment report and interview stakeholders 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 opinion, which is ground for NAQA decision;
- Decision-making by NAQA Board: exemplary accreditation; accreditation; conditional accreditation; denial of accreditation; 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 and stakeholders' feedback on the websites of NAQA and the Ministry of Education and Science of Ukraine. NAQA gathered remarks and suggestions during round tables and presentations of the new approach 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 of the "old system" accreditation was the key challenge for NAQA. Therefore, considerable attention was devoted to clearly and comprehensively communicating information about the accreditation and external evaluation methodology to all stakeholders.

In autumn 2019, before NAQA launched the study programme accreditation, it had developed guidelines regarding the procedure. 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 the most of 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 pandemic and later the introduction of martial law, most events in 2020-2023 were conducted 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) analysis 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 new version Regulations on Accreditation.

Continuous Improvement

In 2021, NAQA prepared the Self-Assessment Report to reflect on its activities regarding the implementation of the ESG 2015. The report, developed following ENQA requirements, served to analyse NAQA procedures and processes critically, and developed an action plan for further improvement. Therefore, in 2022, in cooperation with the Verkhovna Rada (Parliament) Committee on Education, Science and Innovation, the Ministry of Education and Science of Ukraine, representatives of students, employers, 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 independent Appeals Chamber. In 2024, the new Regulations on Accreditation were adopted. 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 revised.
- 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 option for simultaneous accreditation of 2-3 study programmes within the same 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.

NAQA considers the relevant regulations from the Ministry of Defense and the Ministry of Internal Affairs of Ukraine, under whose jurisdiction the respective HEIs are based. Article VIII of the Regulations on Accreditation outlines the specifics of external evaluations for study programmes that contain restricted-access materials.

Thus, NAQA has been making 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. Analysing 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 programme free of charge. Therefore, the procedure does not impose additional financial burdens on HEIs.

ESG standard 2.3 Implementing processes

The 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 leader) 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 ICS, along with the following documents: application for study programme accreditation, study programme profile and curriculum, and reviews from employers (see an example in ICS).

After programme accreditation launch in 2019, the main challenges for NAQA were the underdevelopment of internal higher education quality assurance systems in the 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 (2019).

External Evaluation

Within ten business days of the date of the accreditation application registration, the NAQA

appoints the expert panel. NAQA sets the schedule 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 (the order appointing the expert panel is published in ICS). An expert panel consists of at least 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 a professional association of employers submits a request, a representative of employers may be included in the expert panel (by consent). The expert panel analyses the self-assessment report, documents attached to it, and all other available materials and information regarding the study programme and HEI's activities (available in ICS).

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, and develop recommendations aimed at the quality of the HEI's educational activities. The expert panel carries out the site visit following the agenda agreed upon by the head of the expert panel, the head of the HEI, and/or the programme leader no later than three business days before it starts (available in ICS). The site visit agenda must include meetings with the study programme leader, the authors of the self-assessment report, students, academic staff, employers, and representatives of the HEI's administration, as well as an inspection of the physical resources, an open meeting, and a final briefing.

The COVID-19 pandemic in 2020-2021 and the declaration of martial law in 2022 due to russian aggression forced NAQA to conduct site visits remotely. NAQA is taking the following measures to ensure procedure adherence:

- Regulatory documents have been developed (Temporary order for conducting an accreditation examination using technical means of video communication (2020); Temporary order 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);
- Experts must send links to site visit meetings to the Secretariat, so the designated observer can join. In 2020-2021, an observer from the Secretariat joined all site visit meetings.

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 and other stakeholders. According to the Regulations on Accreditation, site visits are carried out only in a remote or hybrid 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. Otherwise, the accreditation of a study programme that leads to the award of a professional qualification in a regulated profession must be conducted only in on-site (physical) or a hybrid format. Thus, NAQA follows a fit for purpose approach when determining the format of a site visit (physical/hybrid/remote).

External Evaluation Report

The expert panel prepares the external evaluation report based on the results of the accreditation assessment and uploads it to the NAQA ICS (see an example of the external evaluation report in ICS). The HEI has the right to submit substantiated comments on the report to NAQA within three business days.

One of NAQA's key tasks is to maintain the proper quality of external evaluation reports. Since 2021, the NAQA Secretariat 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

The next step is SEC review and verification of the external evaluation report and preparation of the SEC opinion, which also should contain recommendations for improving the study programme and HEI's educational activities, as well as substantiated proposals regarding the level of compliance for each criterion (see an example of the SEC opinion in ICS). HEI and expert panel members can respond to the SEC opinion draft in ICS and participate in the SEC meeting to argue their position.

The stage of the SEC evaluation unifies the approaches to the study programme's external evaluation. This ensures consistency of quality evaluation across all study programmes within the subject area, promotes transparency in the process, and ensures that representatives from employers, students and international experts are included in the review of each accreditation case. Details about the composition of each SEC can be found on the official NAQA website.

Decision-Making Process

Considering the external evaluation report, SEC opinion, and HEI's responses, NAQA adopts one of the following decisions: exemplary accreditation, accreditation, conditional accreditation, accreditation denial, or re-accreditation (see an example of the NAQA decision in ICS). NAQA has the right to decide on the appointment of re-accreditation in cases of violation of the procedures established by the Regulations on Accreditation.

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 improved. Initially, Ukrainian legislation only provided follow-up for study programmes that received conditional one-year accreditation.

Conditional accreditation is granted for one year to study programmes that, based on the external evaluation results, have been determined to comply only partially. This means that the study programme and the HEI's educational activities do not fully meet the defined criteria, but the HEI can eliminate the identified drawbacks within one year. The follow-up external evaluation considers the actions completed by the HEI to correct the drawbacks 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 ensure consistent follow-up procedures. The National Action Plan (2022-2023) highlighted the importance of developing and regulating the procedure for post-accreditation monitoring as a top priority. In 2023, in cooperation with all stakeholders as well as 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 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: HEI's self-evaluation materials which contains information about changes that have been made in the study programme and educational activities since previous accreditation; 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 drawbacks 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 confirms 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: successful completion of post-accreditation monitoring or the need for further work to comply with the established criteria with a deadline to eliminate identified drawbacks.

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. The results of the post-accreditation monitoring pilot are detailed in Paragraph 2.5 of the Quality Review (2024). Currently, HEIs regularly request NAQA to conduct post-accreditation monitoring of study programmes. It will be mandatory for all study programmes that have undergone external evaluation starting from September 2024.

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 panel 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 in the form of post-accreditation monitoring. 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 established consistent procedure for post-accreditation monitoring.

ESG Standard 2.4 Peer-review experts

The professional experts' role is essential for effectively evaluating the study programme quality and offering HEIs valuable recommendations for continuous improvement. NAQA experts ultimately help build trust among HEIs and society regarding the outcomes of external evaluations. Therefore, NAQA ensures that each expert engaged in accreditation reviews possesses the necessary expertise both in the relevant field of study and the programme accreditation procedure.

As for May 2025, the Register of Experts includes 4885 individuals (4074 academic staff representatives and 811 students). The Register of Experts includes representatives of all fields of study, ensuring gender balance, diverse regional representation, and the inclusion of higher education and research institutions from various ownership types and governance structures. Annex M. shows the number of experts according to the subject area.

Composition of an Expert Panel

As a rule, the expert panel is composed of a chair and two experts, including one expert who is

a student. 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 of Experts based on their specialization in the field relevant to the programme being accredited.

2. Student experts are studying at a level equal to or above the study programme being evaluated.

3. For accreditation of PhD programmes, at least one expert in the panel must hold a Doctor of Science degree experienced in PhD students' supervision.

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.

Student Representative

The student expert collaborates within an expert panel on an equal basis; they have equal rights & obligations and equal payments 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.

The main challenge for NAQA in the context of ensuring the involvement of students in expert panels is the turnover of the contingent of students included in the Register of Experts (See Figure 11). The Register requires ongoing replenishment with students from all fields of study, and NAQA must maintain student interest in becoming external evaluation experts.

Figure 11. Trends in the representation of academic staff and students in the Register of Experts
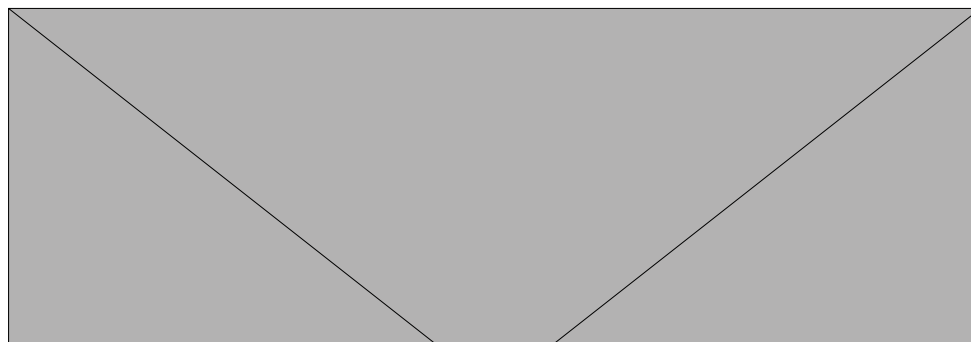
In response to this challenge, in 2024, NAQA took decisive action by collaborating with the Ukrainian Association of Students (UAS) to develop the UAS QA POOL training programme. This initiative is designed to provide potential student experts with the necessary knowledge and skills in quality assurance and highlight their vital role in these processes. Through this programme, NAQA aims to close the gaps in understanding and motivation that may lead to declining student participation. Currently, five UAS QA POOL training sessions have been held in person in different regions of Ukraine (Ternopil: April 2024; Poltava: May 2024; Kyiv: October 2024, Lutsk: March 2025; Lviv: May 2025). Together with Ukrainian Student League NAQA has designed the training programme "Students as Quality Ambassadors".

Employers' 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 business days before the scheduled expert panel visit, and the representative's inclusion is subject to their consent. The participation of employer representatives in the SEC is mandatory. Thus, NAQA ensures that the position of employers representing the relevant industry is taken into account when considering each accreditation case. Including employer representatives has proven highly beneficial through adapting curricula and ensuring that students are better prepared for job market.

International Experts

To ensure a global perspective to external evaluations NAQA intensifies focus on experts with significant international experience, particularly those who study or work in foreign HEIs or/ and QA agencies. As of December 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. The need for finding international experts fluent in Ukrainian has limited the pool of potential candidates. Despite these challenges, the inclusion of international experts has significantly enhanced the accreditation process by aligning Ukrainian study programmes with ESG 2015. Their fresh perspectives and methodologies from EHEA countries allow for a broader, comparative analysis of Ukrainian programmes.

SEC Experts

As of May 2025, 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. Annex O. shows the key principals for SEC formation.

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'. The organizational procedures for SECs operations, case reviews, and expert opinion preparation are detailed in the 'Regulation on Sectoral Expert Councils of the National Agency for Higher Education Quality Assurance'. To guarantee decision independence at different stages of the accreditation procedure, members of the SEC cannot serve on the expert panel for the accreditation of study programmes reviewed by this SEC.

After the formation of the SEC, members undergo targeted training. This contrasts with the process for general experts, who are trained before being considered for inclusion in the Register of Experts. This difference in approach reflects the distinct role of SEC plays in the accreditation process — SEC members verify the expert panel's report, requiring a higher level of professional experience and sector-specific knowledge.

Selection of Peer-Review Experts

The procedures for selecting individuals for inclusion in the Register of Experts, maintaining the Register, forming expert panels, and evaluating the quality of expert performance are outlined in the Regulation on the Expert and Expert Panel of the National Agency for Higher Education Quality Assurance.

The selection process for NAQA experts is designed to ensure that only highly qualified individuals are chosen to participate in the accreditation process. Annex P. shows the stages of the selection process.

Announcements for recruiting academic staff experts are published for each specialty as needed, while the recruitment of student experts is ongoing. Still, students are trained alongside academic staff, ensuring they acquire the necessary skills to participate in external quality assurance processes.

NAQA selects candidates for inclusion in the Register of Experts according to the criteria specified in the Regulation on the Expert and Expert Panel of the National Agency for Higher Education Quality Assurance. These criteria include experience in quality assurance procedures in higher education, developing higher education policies, international experience, and additionally for students — participation in the activities of student self-government bodies and/or the National Student Association of Ukraine. Multifactor selection, the uniform scale for evaluating training performance and the final decision by NAQA Board members reflect a structured and consistent approach to selecting experts.

Competency-Based Training Programmes

In 2019, the start of the study programme accreditation mandated promptly forming a pool of experts well-acquainted with ESG and NAQA external quality assurance methodology. Thus, NAQA announced the first Call for experts in June 2019. All the selected 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 undergo a comprehensive 2-day in-person training.

The Train the Trainer Programme "Ukraine's New Accreditation System: Building on UK Best Practice" was developed with the support of the British Council and trainers from the QAA (UK) to prepare 38 prospective trainers from various regions of Ukraine. Simultaneously, NAQA created a two-day introductory training program for expert candidates. Over the short period of six months, from September 2019 to February 2020, these trainers conducted 95 training sessions to prepare 1,806 experts (1,423 academic staff representatives and 383 students) who were included in the Register of Experts. Since then, NAQA has continuously updated the initial training content for expert candidates to address emerging needs (Annex Q). From 2020 to 2024, NAQA held a total of 179 training sessions for expert candidates, with over 5,000 participants.

Professional Development of Experts

Professional Development Training. NAQA is committed to the continuous professional development of its experts and trainers, ensuring their qualifications remain aligned with ESG 2015. Between 2021 and 2025, NAQA organized a number of training sessions (See Table 7) for experienced experts on topics such as external evaluation report writing, providing recommendations to HEI, site visit planning, expert ethics, integrity, and conflict resolution.

Table 7. NAQA training programmes

Training Programme	Year	Duration (ECTS)	Number of trainings	Number of participants
Advanced Train the Trainers Programme 'Ukraine's New Accreditation System: Building on UK Best Practice'	2020	1 credit	1	38
Professional Development Seminar 'International Review Methodologies for Programme Accreditation'	2021-2022	1 credit	3	143
Training for Expert Panel Chairs	2021-2024	1 credit	35	855

Training Programme	Year	Duration (ECTS)	Number of trainings	Number of participants
Report Writing Training	2023-2024	1 credit	30	581
	2024	3 credits	14	263
Remedial Training	2023	1 credit	6	111
	2024-2025	1 credit	13	172
Training for SEC Experts on SEC Report Writing	2024	1 credit	1	34
Training for SEC Chairs	2025	1 credit	4	57
Training on Leadership in the Expert Panel	2025	1 credit	3	41

Workshops and Webinars. 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 external quality evaluations. 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).

Sectoral Expert Council Webinars. NAQA's SECs contribute to the quality assurance system through webinars. These public events summarize the councils' work, address evaluation challenges, share best practices, and highlight common errors in programme design.

Training for international experts. NAQA has also invested in international expert training, collaborating with partner agencies (e.g. QAA), international organizations (e.g. British Council), and involving trainers from the NAQA Advisory Board. This training helped the participants gain practical insights into integrating their international experience into Ukraine's QA processes, offered recommendations based on best European practices, and identified areas for improvement that local reviewers might overlook.

Briefing before the Site Visit. All experts attend a weekly briefing before their site visit to a HEI. During this briefing, they can ask questions about practical issues while preparing for the site visit and learn more about legislative updates and procedural matters.

Peer learning. Peer learning is vital to experts' continuous professional development. When forming an expert panel, the Secretariat carefully considers each expert's experience in external quality assurance and their participation in NAQA professional development programmes. This approach has proven effective, as experts can share their knowledge, assist one another in addressing weaknesses, and reinforce their areas for improvement. It also allows effective dissemination of experience gained during NAQA training.

Experts' Performance Monitoring and Review is described above in .

Ensuring Independence and No Conflict of Interest

NAQA policy for management addressing conflicts of interest is defined in the NAQA Regulations on the procedure for preventing and resolving conflicts of interest, NAQA Anti-corruption program for 2025-2027, using the Law of Ukraine "On Prevention of Corruption" as the main regulatory act.

Individuals with an actual or potential conflict of interest are not eligible to be part of the expert panel. During formation the expert panel NAQA Secretariat considers the information in the Register of Experts on the presence of a conflict of interest with the HEI of the persons included in it.

The candidate reports this information when filling out the application to participate in the competitive selection to the Register of Experts. Information on mechanisms for preventing conflicts of interest is included in the initial training for expert candidates and the professional development programmes. NAQA Secretariat has the authority to recall an expert from the expert panel and appoint a replacement if there are valid reasons and evidence of conflict of interest.

These measures together guarantee that NAQA upholds a transparent, unbiased, and objective external evaluation process. Through continuous training and feedback mechanisms, NAQA strives to safeguard the integrity of its evaluations and the credibility of the accreditation system.

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. NAQA 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. NAQA has instituted mechanisms to prevent conflicts of interest, ensuring the independence and impartiality of expert accountability. NAQA recognizes that continuous improvement is essential. Despite the successes achieved thus far, areas for further development have been identified. Moving forward, NAQA focuses on enhancing training programmes, expanding the involvement of international experts.

ESG Standard 2.5 Criteria for outcomes

The study programme external evaluation is performed according to explicit criteria published in the Annex to the Regulations on Accreditation. The expert panel evaluates levels of compliance with the criteria requirements according to four levels:

A — full compliance with the defined criterion, innovative and/or exemplary practices are identified;

B — full compliance with the defined criterion, minor drawbacks are identified;

E — partial compliance with the defined criterion, major 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, 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.

To maintain consistency of evaluation outcomes and criteria for interpreting and decision-making within the same subject area and to manage a substantial number of accreditation cases, NAQA established an additional stage for external evaluation reports verification at the SEC level. SEC evaluates the quality and consistency of external evaluation reports and clarifies the suggested recommendations. 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.

In 2019-2024 in 88% of cases the decision of the expert panel, SEC, and NAQA Board on accreditation level was unanimous (See Figure 12).

Figure 12. Cases on which expert panel (EP), SEC, and NAQA Board agreed on the decision
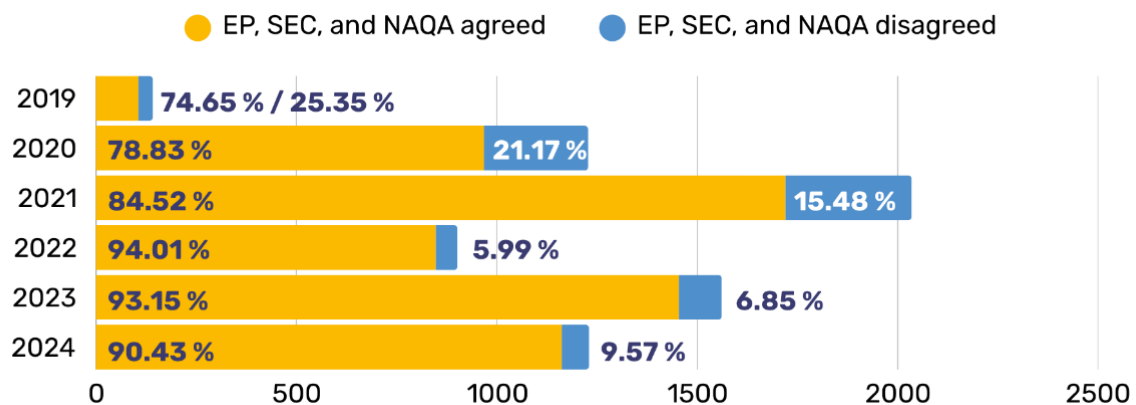
Most often, the change in the levels of compliance with the criteria requirements occurs from level A to B since the SEC overviews exemplary cases from the nationwide perspective within the particular subject area. In other cases, the changes in the compliance levels are related to the differences in the interpretation of major drawbacks by expert panels and the SEC. It is crucial for NAQA to maintain consistency in applying criteria requirements in the external evaluation procedure, so when making a decision, the NAQA Board considers the justification provided by SEC and the expert panel and the argumentation of HEI.

This was addressed by NAQA through development of List of Major Drawbacks and "Clarifications on the Application of the Criteria for Study Programme External Evaluation". List of Major Drawbacks is a structured document designed to ensure a unified approach and objectivity in establishing levels of compliance with the Criteria for assessing the study programme's quality. This tool helps the expert panel to systematize the conclusions on the major drawbacks identified. It provides a clear understanding of the assessment requirements, increasing the process's transparency and strengthening trust in its results. "Clarifications on the Application of the Criteria for Study Programme External Evaluation" contain a description of the requirements for the study programme and HEI's internal quality assurance system functioning; references to ESG 2015 and Ukrainian legislation; recommendations for substantiating the drawbacks identified.

Therefore, the NAQA carries out an external evaluation of the study programme based on clearly defined criteria published in the Regulations on Accreditation. Consistency in interpreting criteria is ensured through developing guidelines for experts and the systematic organization of webinars and seminars for all stakeholders. The process involves reviewing the external evaluation report and its verification by the SEC to maintain consistency of evaluation outcomes and criteria interpreting, decision-making within the same subject area, and managing a substantial number of accreditation cases.

ESG Standard 2.6 Reporting

The external evaluation report includes general information about the study programme, analysis, strengths and weaknesses of study programme by each criterion, a report summary and recommendations. The analysis includes the facts and evidence concerning adherence to the established criteria, identifying good practices and weaknesses, justifying the level of

compliance. The report summary provides an overview of the study programme's quality, identifying areas for improvement, and suggesting recommendations for the HEI's follow-up actions.

The SEC opinion includes a justified assessment of the study programme according to specified criteria, reasoning based on a thorough review of the self-assessment report, external evaluation report, accompanied HEI's comments. The SEC opinion also includes follow-up action recommendations.

To ensure the proper quality of the external evaluation report, NAQA Secretariat verifies the draft report for consistency, clarity (without being able to influence the decision made by the expert panel). After the expert panel submits the external evaluation report to ICS, the HEI may submit a motivated comment to highlight factual inaccuracies. After the SEC opinion draft is developed, if the HEI or the expert panel disagrees with its conclusions or identifies a misinterpretation of facts, they can provide a motivated comment in ICS.

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

1) The study programme self-assessment report; the agenda of the experts' site visit and notification of the date, time and place of the open meeting; NAQA Board decision, SEC opinion, external evaluation report are published on HEI's website;

2) The order on approval of the expert panel; NAQA Board decision; SEC report; and the external evaluation report are also available on NAQA ICS.

According to Article 25 of the Law of Ukraine on Higher Education, NAQA enters information on study programme accreditation into the USEDE within three days of submitting the corresponding certificate (official decision) on the study programme accreditation.

NAQA ICS 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 opinion. It has three modules: Schedule, Accreditation, and Public Access.

- **The Schedule module** contains information about the accreditation schedule for the relevant academic year, the possibility for HEI to submit intention to accredit the study programme. The module provides users with open access to view the current accreditation schedule.

- **The Accreditation module** contains information about all stages of the accreditation. It provides access to personal accounts of accreditation participants.

- **The Public Access module** provides open access to accreditation materials.

Therefore, the compulsory publication of the external evaluation report, the SEC opinion, and NAQA Board decision are established by the Regulations on Accreditation. NAQA ICS ensures that all involved into accreditation are informed at each stage of the accreditation, allowing them to feedback the external evaluation report and the SEC's draft opinion.

ESG Standard 2.7 Complaints and appeals

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 2019-2023, 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 appeals procedure was clear and transparent.

Nevertheless, in 2021, NAQA conducted a self-evaluation to assess compliance with the ESG 2015, identifying the need to meet standard and ensure the independence of its decisions by reforming the Appeals Committee. 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 the 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, independent, collegial body. It consists of five members elected for a term of two years on a competitive basis. To protect the impartiality of the decisions rendered, members of the NAQA Board and its SECs are not eligible to apply for Appeals Chamber. The Competition Commission that selects the members of the Appeal Chamber 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.

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 ICS. The Appeals Chamber considers an appeal against NAQA decision by 30 calendar days from the date of its receipt. The Appeals Chamber makes a conclusion to either reject an appeal or cancel the NAQA decision. The motivated decision of the Appeals Chamber is posted on the NAQA website. Based on the findings from the appeal review, it includes a summary of the appeal, a justification for considering the appeal on its merits, a summary of the study programme accreditation results, conclusions, and the Appeals Chamber's final decision.

During December 2024 - July 2025, the Appeals Chamber considered two appeals from HEIs against the NAQA's decisions. One of them was not satisfied because the request exceeded the Appeals Chamber's authority. Based on the results of considering another appeal, the Appeals Chamber decided to satisfy the appeal and terminate the NAQA's decision regarding the external evaluation of the relevant study programmes.

Complaints

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. 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 and the SEC's draft opinion. HEI's remarks are taken into account both at the SEC meeting and when NAQA considers the accreditation case.

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.

NAQA considers complaints related to the accreditation procedure by the Procedure for Considering Complaints from HEIs Regarding Study Programme Accreditation.

HEI has the right to apply a complaint to NAQA on the following grounds:

- violation of the accreditation procedures;
- decision-making by an expert panel or SEC based on documents containing false information, which was not known at the time of making such a decision;
- non-compliance of the external evaluation report or SEC's expert opinion with the Assessment Criteria;
- bias, objectivity or unethical behaviour of the experts or SEC's members;
- violation of the NAQA anti-corruption policies.

Complaints during the accreditation procedure are submitted to the ICS as a motivated comment on the external evaluation report or the SEC's opinion draft. These comments, included in the accreditation case, are considered at the SEC's meeting and the NAQA Board meeting. HEIs have the right to express objections during the consideration of relevant cases at both the SEC and NAQA Board meetings. Complaints in written or electronic form can be submitted to the NAQA Secretariat, following the NAQA Instructions for the Administration of Complaints from Citizens. The NAQA Leading Specialist on Anti-Corruption Activities addresses complaints regarding violations of its anti-corruption policies.

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 to ensure independence of decision-making on appeals. For this reason, NAQA initiated changes to Ukrainian legislation in 2022-2024 and established legal bases for the independent Appeals Chamber which was launched in the fall of 2024.

10. OPINIONS OF STAKEHOLDERS

Engagement of stakeholders, cooperation with them, and their participation in the Agency's management and decision-making processes is one of the fundamental principles of NAQA activities. Systematic feedback collection, its analysis and further implementation into NAQA's activities, policies and procedures is an integral part of agency's work. The representatives of students' unions, HEIs, labour market, Advisory Board are included into the working groups on policies and documents development.

The Agency collects stakeholders' opinion by conducting surveys on EQA procedures satisfaction within HEIs representatives (e.g. study programme leaders) and experts, and analysed and published in NAQA Annual Reports, e.g. Report 2024 p. 110, Report 2023 p. 81. For instance, based on feedback of NAQA experts and HEI representatives in February 2024 the training on report writing was revised and improved. Additionally, feedback is often received during the webinars, seminars, roundtables, UQAF and targeted meetings with employers, students, HEI's representatives conducted by NAQA. For example, there several meetings with students' representatives regarding EQA, has been resulted with trainings for students, such as joint initiative of NAQA and USL "Educational project "Students as Ambassadors of Quality: Training on Improving Study Programmes".

Agency's SAR was also developed in close cooperation with the stakeholders. In February 2025 the first SAR draft was shared with Advisory Board members and during the Advisory Board meeting in March 2025 the Agency received a feedback and recommendations from Advisory Board members on SAR improvement. Additionally, within SEQA-ESG 2 staff mobility programme, the Agency received general recommendations on SAR and external evaluation preparation from SAAHE colleagues. First SAR draft was published on official NAQA website on April 2025 and since that time the Agency has collected and analysed stakeholders' opinion till the end of June 2025.

Input from students, employers, representatives of HEIs, national and international partners, as well as QA experts regarding the NAQA SAR and SWOT analysis, was carefully gathered and analysed. Feedback was collected through a variety of channels, including events, informal discussions, and individual meetings. For instance, SAR was presented on the All-Ukrainian Round Table "A New Design of the Higher Education Quality Assurance System" in April 2025. A wide discussion with all stakeholders (rectors of 40+ HEIs, student unions leaders, employers' representatives, educational experts) helped to highlight and confirm NAQA's strengths and to identify the areas of improvements within agency activities.

NAQA also received written feedback, which included stakeholders' views on the Agency's strengths and constructive recommendations for improvement. The major suggestions for NAQA's further development relate to the following areas: expansion of ICS functionality, further development and promotion of a quality assurance culture among stakeholders; broader range of topics for thematic reviews; greater involvement of international experts in EQA; introduction of institutional accreditation.

NAQA considers these recommendations to be realistic and valuable for strengthening both its internal processes and external QA mechanisms and considered in the National Action Plan for 2024-2026 and NAQA's Action Plans.

11. SWOT ANALYSIS

NAQA's SWOT analysis is conducted and regularly revised during the annual strategic sessions by NAQA Board members, Secretariat, with the extensive engagement of external stakeholders (students, employers, HEIs representatives).

Strengths	Weaknesses
• Sustainability and resilience in extraordinary conditions (e.g. COVID, wartime); • Complete transparency of accreditation at all stages of the procedure; • Digitalisation of entire accreditation through ICS and its public availability; • Regular analysis and reporting on EQA through Annual Reports and Quality Reviews; • Active engagement into national legislation on HE QA revision; • Students' representation at all levels (inc. NAQA Board); • Continuous improvement of all EQA processes and procedures resulted by internationalisation and peer-learning; • Comprehensive Communication Strategy supporting all NAQA activities, legislative changes, etc; • Diversified and well-established training system for experts' professional development; • Comprehensive experts' performance evaluation system; • Introduced SECs provide verification and analysis as a part of the internal QA of the study programme external evaluation; • Fair and equal remuneration for all experts including students; • Stakeholders' opinion consideration at all stages of EQA.	• Limited involvement of international experts due to procedures being conducted in the Ukrainian language; • Secretariat staff turnover; • Legislative restrictions on the funds use and transfers under martial law; • Subjectivity of individual experts in interpreting assessment criteria; • Varieties in experts' reports quality; • Excessive workload due to a large amount of accreditation procedures; • Security factors force some EQA procedures to be conducted in remote or hybrid formats; • Lack of formalised procedures for evaluating Secretariat staff.
Opportunities	Threats
• Update of the ICS e.g. postaccreditation monitoring module; • Promoting of the HEIs' quality culture enhancement; • Further involvement of international experts into EQA; • Diversifying of thematic analysis; • Continuous professional development of NAQA Secretariat; • Broader involvement of employer representatives; • Engagement of displaced Ukrainian students and teachers who gained international experience.	• War; • Destruction of property and loss of personnel due to the conditions caused by russia's invasion; • Threats of cyberattacks and of terrorist acts; • Long-lasting and bureaucratic process of making changes to higher education quality assurance legislation; • Lack of self-critical approach among HEIs during EQA; • Regular legislative changes on higher education; • Risk of an increase in the number of appeals & complaints, and a shortage of human resources to process them; • Low motivation of employers to be engaged into EQA.

12. KEY CHALLENGES AND AREAS FOR FUTURE DEVELOPMENT

Within 6 years of NAQA's active work, the Agency faced a number of challenges caused by various factors.

The first group of challenges is associated with the war and its impact on all HE stakeholders. Among these challenges delivery of higher education services in remote mode due to security, destruction of some HEIs' infrastructure, staff and students' relocation. All these impacts NAQA activities in particular NAQA conducts accreditation in different modes including hybrid and online to meet HEIs needs and fit for purpose. NAQA must ensure security of all accreditation participants, including experts and interviewees. Considering the fully digitalised accreditations NAQA is also challenged with cyberattacks and should work with stakeholders regarding the digital competences as well as to protect ICS.

The second group of challenges is caused by a substantial number of study programmes in Ukraine which causes excessive workload for NAQA staff and experts. Another reason for workload increase is associated with changing higher education legislation and need for relevant adaptation of NAQA documents and procedures. In this regard NAQA addresses this challenge by increasing the number of NAQA Secretariat to 30%. NAQA constantly recruits and trains experts. In order to manage a huge number of accreditation cases the ICS is constantly being improved, including considering potential of AI. To process big data a methodology and digitalised tool have been developed and implemented. To optimise NAQA operational activities a number of IT tools are being used. To manage increasing workload and to enhance EQA NAQA has developed a concept of introducing cluster, institutional accreditation and network of QA agencies.

The third group of challenges is relevant to evaluation of study programmes and consistency of its outcomes across the subject areas. To address this challenge NAQA develops and permanently updates guidelines, tools for evaluations, instructional material; provides informational and learning opportunities for stakeholders, implemented a comprehensive system of experts' professional development, searches opportunities for a wider engagement of international experts. SECs as well as experts' performance evaluation system have been introduced as a tool of internal QA of NAQA and contribute to consistency of EQA.

Thus, in cooperation with its stakeholders NAQA permanently works to address these challenges and turn them into strengths.

ANNEXES

Annex A. NAQA's Organisational Structure (the detailed structure is available on NAQA website)

Advisory Board

Expert consultant and advisory body which consists from recognised international experts on quality assurance and academic integrity.

NAQA's Sectoral Expert Councils (SECs)

(31 sectoral expert councils)
NAQA's permanent collegial bodies. They participate in study programme accreditation procedures, post-accreditation monitoring, expertise of higher education standards, etc.

NAQA's Experts
- academic staff
- students
- international experts

Commission for Quality Assurance of Expert's Work

The National Agency for Higher Education Quality Assurance

Collegial body (23 persons)

NAQA's Head and Vice Heads (work at the agency on a permanent basis).

NAQA members (in particular, stakeholders: employers and students) work at their main place of employment at HEIs, research institutions, other institutions and organisations.

- Ethics Committee
  considers academic integrity misconduct.
- One-time Specialised Academic Councils Committee
  considers appeals, applications and complaints regarding violations of the established procedure for defending a thesis for the degree of Doctor of Philosophy.
- Military Education Committee
  considers issues related to improving the quality of military higher education.
- Study Programmes Accreditation Committee
  develops proposals regarding accreditation procedure improvement, considers HEIs requests for one-year conditional accreditation under the martial law according to the Resolution of the CMU № 295 from March 16, 2022.

Secretariat

Permanent Agency's working body that provides organisational, financial, material and technical, informational and other support for its activities.

- Head
- Vice Head

Secretariat structure:
- 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
- Accounting and Financial Support Department
- HR Department
- PR and International Cooperation Department
- Analytics and Training Support Department
- IT Department
- Institutional Accreditation Support Department
- Leading Specialist on Anti-Corruption Activities
- Records Management Sector
- Material and Technical Support Sector

Appeals Chamber

Considers appeals against NAQA's decisions in accordance with the procedure specified in the Regulation.

(5 persons)

NATIONAL AGENCY for HIGHER EDUCATION QUALITY ASSURANCE (UKRAINE)

Annex B. Activities of the Structural Units of NAQA

Structural Unit	Areas of Activity
Study programmes accreditation	
Study Programme Accreditation Department	• 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; • 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; • Consultation support to the guarantors on procedural issues via e-mail accreditation@naqa.gov.ua; • Respond to public appeals and official requests for information from higher education institutions within the authority of the department; • Information and analytical work and quality control of accreditation case files; • Educational and consulting activities (participation in webinars, conferences, trainings, round tables and international programmes on accreditation of study programmes); • Preparation of materials for the NAQA Board meeting within the authority of the department.
Expert Support Department	• Organisation of the selection of qualified experts for accreditation of study programmes in the relevant specialities; • Organisation of work on preparation, training and testing of experts; • Organisational support of accreditation examinations; • Advising experts on the accreditation of study programmes; • Management of the register of experts; • Support of the Commission for Quality Assurance of Expert's Work; • Analysis of experts' work; • Conclusion of contracts with experts; • Preparation of draft acts on the activities of experts.
Support of Sectoral Expert Councils Department	• Organisational, informational, analytics and technical support for the activities of sectoral expert councils (hereinafter – SECs); • Support for the activities of the SECs in reviewing accreditation cases, and higher education standards and support in holding SECs meetings; • 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; • Organisational, documentary, technical and informational support of the competition to the SECs; • Participation in the development and amendment of regulations on the accreditation of study programmes and the work of the SECs; • Cooperation with other structural units of the Secretariat on issues related to the activities of the SECs.

Structural Unit	Areas of Activity
Specialised councils and integrity	
Academic Integrity and One-time Councils' Operation Department	• 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); • Provision of information, consultation and methodological assistance to higher education institutions (research institutions) on the application of Procedure No. 44; • 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; • 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; • Participation in the development and amendment of regulations on academic integrity, certification of PhD candidates and the activities of one-time specialised academic councils.
Support of NAQA administrative and economic activities	
Preparation of Meetings and Support of the Committees' Work Department	• Organisation of NAQA Board meetings and drafting of NAQA decisions; • Provision of information, organisational and technical support for NAQA Board meetings; • Provision of legal, informational, organisational and technical support to the Appeals Committee and the Military Education Committee; • Provision of legal, informational, organisational and technical support to the Commission for Quality Assurance of Expert's Work; • Preparation of documents based on the results of the NAQA Board meeting. • Preparation of analytical information on accreditation cases; • Entry of information into NAQA IT system.
Legal Department	• 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; • Ensure representation (self-representation) of NAQA's interests in the courts of Ukraine and other bodies in accordance with the established procedure;

Structural Unit	Areas of Activity
Legal Department	• Development and participation in the development of draft legal acts and other regulatory documents on issues within the competence of NAQA; • 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; • 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; • Implementation of measures to prevent corruption in NAQA and control over their implementation in accordance with the law; • Organisation of claims and lawsuits and control over their execution; • Analysis the materials received from law enforcement and regulatory authorities, the results of claim work, etc., and taking measures to eliminate the identified violations; • Provision clarifications on the application of legislation, providing legal advice on issues within the competence of NAQA; • Promotion compliance with the law in the exercise of the rights of NAQA's staff.
Leading Specialist on Anti-Corruption Activities	• Organising anti-corruption measures and monitoring the implementation of anti-corruption legislation; • Organising work on managing corruption risks in NAQA activities; • Providing methodological and consulting assistance regarding anti-corruption legislation; • Implementing measures to identify conflicts of interest and facilitate their resolution; • Checking the status of filing declarations and notifying the National Agency on Corruption Prevention of cases of their failure to file or untimely filing; • Considering reports of violations of the requirements of the Law of Ukraine "On Corruption Prevention"; • 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; • 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; • Performing other tasks stipulated by the legislation in the field of preventing and combating corruption.
Material and Technical Support Sector	• Organisation and implementation of measures for the material and technical support of NAQA Secretariat; • Organisation and implementation of processes for the resource provision of structural units with stationery, office equipment and supplies, computer and peripheral equipment, furniture, etc.;

Structural Unit	Areas of Activity
Material and Technical Support Sector	• Organisation of measures to ensure proper maintenance and operation of the office premises; • Organisation and implementation of processes for the technical maintenance of communication facilities, energy and water supply systems, plumbing and heating; • Implementation of measures to organise and ensure timely repair, maintenance and modernization of material and technical facilities; • Implementation of control over the serviceability and maintenance in proper technical condition of the material and technical base of the Secretariat.
Records Management Sector	• 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; • Developing and ensuring compliance with the NAQA's Instruction on Record Keeping and the nomenclature of cases; • Organisation of document flow, formation of files, their storage and preparation for transfer to the archive; • Ensuring processing of orders and instructions of the Head of NAQA, his/her deputies, and the Secretariat management; • 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; • 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; • Development and timely revision of the Labour Protection Manual; • Participation in the implementation of measures to purchase and systematically update office equipment, technical means of labour, equipment of workplaces of the NAQA employees; • Participation in the preparation of materials for public procurement on issues within the competence of the department; • Developing the nomenclature of NAQA's files; • 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; • 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; • Preparation and transfer of documents to the NAF and to the Central State Archive of Higher Authorities and Administration of Ukraine.

Structural Unit	Areas of Activity
Accounting and Financial Support Department	• 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; • 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; • Planning and analysis of NAQA's financial and economic activities; • Operational management of funds within the approved budget of the general and special funds and their redistribution; • Ensure compliance with budget legislation when making budget commitments, timely submission for registration, making payments in accordance with the budget commitments; • Ensure control over the availability and movement of property, the use of financial and tangible/intangible resources in accordance with approved regulations; • Prevention of negative phenomena in financial and economic activities, identification and mobilisation of internal reserves; • Co-operation with other structural units of the Secretariat on issues related to the activities of the department.
HR Department	• Ensuring and organising HR processes at NAQA in accordance with the requirements of the law; • Organisation of HR management processes in accordance with the needs of the Secretariat; • Maintenance of personnel records; • Maintenance of military records of NAQA's staff.
IT Department	• IT support of NAQA.
PR and International Cooperation Department	• Formation of NAQA's positive image; • Informing the public about NAQA's activities; • Cooperation and interaction with the media, international and foreign agencies and institutions, partners; • Monitoring of media coverage of NAQA's activities, organisation of prompt response to critical messages; • Monitoring public opinion on the assessment of NAQA's activities; • Formation and implementation of NAQA's information policy; • 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; • Organising and holding press conferences, round tables, international meetings and other events (online and offline); • Monitoring grant projects, writing grant applications, preparing and implementing grant projects; • 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.

Structural Unit	Areas of Activity
Analytics and Training Support Department	• Organisation of a unified information and analytics support for NAQA's activities; • Monitoring and analysis of statistical information on the state and trends of higher education; • Coordination of activities in the field of information exchange with educational, scientific institutions and other organisations; • Preparation of information and analytics on quality assurance in higher education; • Development of educational and methodological materials for training of experts and members of the SECs; • Conducting trainings and other educational events.

Annex C. NAQA Milestones

NAQA milestones

6 years of active history

2 years in pandemic   3 years under martial law

Date	Milestone
July 1, 2014	Law of Ukraine «On Higher Education» establishing NAQA
July 27, 2016	NAQA Statute is approved by Cabinet of Ministers
December, 2018	NAQA members elected
February, 2019	NAQA official launch
July 11, 2019	Regulations on Accreditation of Study Programmes in Higher Education
November 4, 2019	The first on-site visit of expert panel
March 16, 2020	Temporary Procedure for Conducting Accreditation Using Technical Means of Video Communication in pandemic
March 16, 2020	INQAAHE membership
March 25, 2020	The first remote expert panel visit in pandemic
June 18, 2020	Affiliate of ENQA
July 17, 2020	CEENQA membership
July 27, 2020	ICAI membership
April 14, 2022	Regulation on Accreditation of Study Programmes in Higher Education under Martial Law
October 18, 2022	GAIN membership
March 15, 2023	ENAI membership
May 2, 2023	Amendments to the Law of Ukraine «On Higher Education» for full compliance with ESG-2015
January 23, 2024	Approval of the updated NAQA Statute
November 6, 2023	UQAF - 2023 - Ukrainian Quality Assurance Forum. The tradition of holding annual national forums as a key event in the field of quality assurance in higher education in Ukraine has been established.
December 21, 2023	Regulations on the Appeals Chamber of the National Agency for Higher Education Quality Assurance
May 15, 2024	Approval of the updated Regulations on Accreditation of Study Programmes in Higher Education

Annex D. NAQA IQA System Structure

INTERNAL QUALITY ASSURANCE SYSTEM OF NAQA

Structure and responsibilities

Quality system level	Key processes at this level	Persons / Collegial bodies responsible for implementing the functions and procedures of the quality system at the appropriate level*
Strategic level	• managing the implementation of NAQA's Strategy; • managing resources, reputation and communication; • managing the effectiveness of key processes.	• NAQA Head • NAQA Vice Heads • NAQA Members • Head of NAQA Secretariat
Tactical level	• process informatisation; • ensuring balanced resource provision; • monitoring and reviewing internal procedures.	• Vice Head of NAQA Secretariat • Head of the Analytics and Training Support Department • Heads of other structural departments of NAQA Secretariat • Commission for ensuring the quality of experts' work
Operational level	• analysis of operational performance; • improvement of processes in interaction with stakeholders; • ensuring transparency and accountability.	• Employee(s) of the Analytics and Training Support Department - specialist in analytical support of NAQA quality system • Other NAQA Secretariat employees • Experts • Sectoral expert councils • Leading Specialist on Anti-Corruption Activities

Quality system functions and procedures

Information and analytical:

- functioning of information systems and data exchange;
- reporting on performance results;
- publication of reports, materials, analytics;
- responding to stakeholder requests;
- analysis of resource provision and regulatory framework;
- preparation of self-assessment report.

Planning and forecasting:

- strategic and operational planning;
- raising stakeholder awareness;
- developing proposals for process improvement.

Regulatory and advisory:

- updating internal procedures;
- promoting a culture of quality;
- reviewing complaints and appeals;
- training and developing recommendations for stakeholders;
- supporting the activities of experts.

Control and diagnostic:

- internal monitoring and audits;
- prevention of conflicts of interest;
- analysis of the effectiveness of policies and procedures;
- monitoring compliance with standards and integrity;
- evaluation of the work of experts;
- study of the impact of NAQA's activities.

*The role, powers and responsibilities are detailed at the following link.

Annex E. Adaptations of Accreditation Procedures under Extraordinary Circumstances

NAQA has demonstrated high resilience and adaptability in maintaining external quality assurance activities during extraordinary circumstances, such as the COVID-19 pandemic and the full-scale russian invasion of Ukraine. These adaptations ensured the continuity of accreditation procedures while safeguarding compliance with ESG 2015 principles.

№	Context and Challenge	Adaptation Measure	Evidence
1	COVID-19 Pandemic Response (March 2020)	Development and implementation of the "Temporary Procedure for Conducting Accreditation Using Technical Means of Video Communication in Pandemic," ensuring continuity of accreditation processes during quarantine while maintaining compliance with legislative and ESG requirements.	NAQA Board Decision, 2020
2	Full-scale invasion of Ukraine by russia (February 2022)	Development and adoption of the "Temporary Procedure for Accreditation under Martial Law" to regulate accreditation activities under conditions of force majeure, disruption of HEIs' operations, and security risks.	NAQA Board Decision, 2022
3	Evolving wartime challenges (2022–2024)	Strengthening the Temporary Procedure in 2024 to ensure its application exclusively in exceptional cases (e.g., HEI relocation, destruction of infrastructure, occupation). Emphasis was placed on preserving standard accreditation practices whenever possible.	Procedure for the Work of the Commission on Reviewing HEI Requests for Conditional Accreditation under CMU Resolution No. 295
		Establishment of a Commission (later formalised as a Committee) to review HEIs' requests for conditional (deferred) accreditation without or with partial expert evaluation, in accordance with CMU Resolution No. 295 (March 16, 2022).	Procedure approved by NAQA Board, January 14, 2025 (Protocol No. 1 (73))
4	Accreditation challenges caused by force majeure events	Introduction of formal mechanisms to suspend or cancel accreditation procedures when continuation is objectively impossible.	2024, Regulations on Accreditation of Study Programmes (Clause 8, Section III; Clause 12, Section II)
5	Maintaining procedural transparency and integrity	Ensuring that even under the Temporary Procedure, key principles of transparency (publication of decisions), collegiality (accreditation decisions based on collective voting), and documentation (full expert reports) were maintained.	Temporary Procedures 2020, 2022, 2024
6	Supporting displaced HEIs and students	Initiative to identify HEIs willing to temporarily host students displaced from combat zones to ensure educational continuity.	2022, NAQA Initiative
7	Upholding ESG under Extraordinary Conditions	Despite extraordinary conditions, NAQA ensures meeting ESG.	2024, Regulations on Accreditation of Study Programmes

The adaptation measures implemented by NAQA during the COVID-19 pandemic and wartime emergencies ensured a strategic balance between flexibility and adherence to quality standards. Temporary procedures were promptly introduced, exceptional measures were were carefully and selectively applied only when justified by documented circumstances. Special focus was given to supporting displaced HEIs and students. All adaptations were carefully aligned with ESG 2015 requirements.

Annex F. Enhancement of Expert Methodology and Reporting, Improvement of Accreditation Procedures

NAQA continuously improves its accreditation procedures, expert methodology, and evaluation practices to ensure consistency, objectivity, and alignment with ESG standards. The development is grounded in training, methodological updates, analytical feedback, and procedural refinement.

№	Area of Improvement	Description	Source / Implementation Year
1	Structural Changes in Expert Panel Reports	Separation of "Drawbacks" and "Recommendations" sections to enhance clarity and focus on improvement actions. Experts are required to provide recommendations even in the absence of drawbacks, reinforcing developmental orientation.	Implemented from September 2024
2	Introduction of List of Major Drawbacks	In 2024, NAQA introduced List of Major Drawbacks to standardize the interpretation of accreditation criteria and ensure consistent identification of significant deficiencies. This tool enhanced the objectivity of expert conclusions and contributed to analytics-based quality assurance.	Approved by NAQA Board, August 2024
3	Expert Training System	Regular mandatory trainings were introduced to support expert capacity and unify evaluation approaches. Key events include the "Report Writing" training (2023), "Refinement" training (2024), and continuous development activities throughout 2020–2025.	2019–2025, NAQA Training Programs
4	Development of Instructions for Experts	Clear instructions on organising expert work, structuring report sections, and providing substantiated recommendations aligned with SMART principles.	2020, updated in 2023 and 2024
5	Guidelines for Experts	The Guidelines clarify the requirements for evaluating compliance with accreditation criteria, provide explanations for consistent interpretation, and outline expectations for justification of findings in expert reports. They ensure coherence and transparency in the assessment process.	2019, 2020, 2024
6	Analytical Use of Accreditation Results Based on List of Major Drawbacks	Analysis of the frequency, distribution, and correlation of major drawbacks across accreditation criteria; criterion-specific frequency analysis across all programmes, conditionally accredited programmes, and programmes with drawbacks; identification of frequent combinations of drawbacks; analysis by education level, ownership, and field of study.	Initiated in 2024, Annual Review on HE Quality
7	Methodological Reviews and Feedback Loops	NAQA implemented a feedback mechanism that uses results from accreditation reports, surveys, and stakeholder feedback to revise methodology and documentation.	Stakeholder Surveys, 2019–2024

These developments reinforce NAQA's strategic commitment to aligning external quality assurance procedures with ESG principles, ensuring fairness and consistency in accreditation decisions, and driving continuous improvement in Ukrainian HE.

Annex G. Documentary Evidence of Regularity of External Quality Assurance Activities

NAQA ensures the regularity and continuity of external quality assurance activities through a robust legislative framework, systematic planning, and transparent reporting mechanisms.

№	Type of Evidence	Description	Source / Link
1	Legislative Requirements	Accreditation certificates are valid for 5 years; conditional certificates are valid for 1 year (Article 25). Post-accreditation monitoring required in the 3rd year (Article 183).	Law of Ukraine "On Higher Education
2	Accreditation Schedules	Annual public schedules with study programme accreditation procedures (e.g., 2755 procedures planned for 2024–2025).	https://plan.naqa.gov.ua/
3	Systematic Planning	Accreditation planning conducted through NAQA's ICT system, with open monitoring of each accreditation case.	NAQA ICT System
4	Statistical Data	Data on accreditation decisions by year, presented in Table 1 of the Self-Assessment Report.	Table 1, SAR
5	Post-Accreditation Monitoring	Mandatory monitoring in the third year after accreditation, ensuring systematic follow-up.	Law of Ukraine "On Higher Education", Regulations on Accreditation
6	Annual Reporting	Detailed reports on the number of accreditations conducted, periodicity, and procedural outcomes published annually.	NAQA Annual Reports

This evidence confirms that NAQA's accreditation processes are regular, transparent, and aligned with national legislation and ESG 2015 requirements.

Annex H. International Recognition and Cooperation

NAQA's international recognition and active participation in global quality assurance networks confirm its compliance with European and global standards of transparency, reliability, and continuous improvement. This recognition reinforces the acceptance and credibility of NAQA's accreditation results.

№	Area of International Activity	Description	Source
1	Membership in International Networks	NAQA is a full or associate member of five international organizations: INQAAHE, CEENQA, GAIN, ENAI (full member), ENQA (associate member). Membership demonstrates NAQA's alignment with international QA standards and principles.	Official Network Websites, NAQA official website
2	International Quality Assurance Projects	Participation in the ERASMUS+ SEQA-ESG2 project (2022–2025), coordinated by ENQA, aimed at supporting agencies in aligning with ESG 2015. Through active involvement, NAQA improved its policies and practices and enhanced international cooperation.	SEQA-ESG 2 project
		NAQA actively participates as a partner in numerous Erasmus+ capacity-building projects: SimS, EDUQAS, SmartPL, OPTIMA, DigiUni, CLOUD HED, UkraineDigiTrans, DOMANI. These projects focus on quality assurance reform, digitalization of education, academic integrity, and innovation in higher education.	Erasmus+ Project Reports
3	Cooperation with International Organizations	NAQA collaborates with OSCE, USAID, the National Erasmus+ Office in Ukraine, and the British Council, contributing to joint initiatives on academic integrity, higher education modernization, and institutional capacity building.	Cooperation Agreements; Public Event Reports
4	External Evaluations and Strategic Support	Through participation in advisory activities and external evaluations with international partners, NAQA receives feedback for strategic and operational improvement. The agency's activities are regularly reviewed by its International Advisory Board. At NAQA's initiative, an independent analysis "Independence Indicators of Quality Assurance Agencies" was conducted by SQAA (Slovenia) and CEENQA to assess NAQA's autonomy at multiple levels (2020).	Advisory Board Meeting Minutes; International Peer Review Results, Results of external evaluations: "Independence Indicators of Quality Assurance Agencies"
5	Contribution to European Higher Education Area (EHEA) Goals	NAQA actively contributes to the Bologna Process objectives through promoting ESG implementation in Ukraine, supporting student-centered learning, transparency, and institutional autonomy.	Strategic Reports; International Policy Contributions

NAQA's extensive international engagement ensures that its accreditation procedures, internal standards, and quality assurance methodologies are aligned with European and international best practices. This strengthens the trust of Ukrainian and foreign stakeholders in the outcomes of NAQA's external quality assurance activities.

Annex J. Review and Improvement Cycle of Internal Quality Assurance System

Cycle Element	Description	Examples (2023–2025)
Plan	Strategic and operational planning based on self-assessment, stakeholder feedback, and review of core documents, which feeds into structured implementation (Do) and is subject to further monitoring (Check). Planning activities ensure alignment with strategic goals and reflect input from key internal and external stakeholders.	Strategic planning session (April 2024); Development of the National Action Plan on Ukrainian external higher education quality assurance (2024-2026); Revisions to the Charter; Strategy Implementation Plan (Action Plan) (2024-2026)
Do	Implementation of planned activities, including updated policies, internal procedures, staff and expert training, and piloting of new tools and formats, in line with the strategic vision. Implementation is coordinated across functions and supported with relevant resources and communication	Updated Communication Strategy (2024); New Regulations on accreditation (2024) New Regulations on Experts and Expert Panel (2024); New tool: List of Major Drawbacks (2024); Updated expert report templates (2024); Updated instructions for experts and SEC members (2024); Methodological guidelines "Clarifications on the Application of the Criteria for Assessing the Quality of Study Programmes"; New Online course for expert candidates; Revised expert training programmes and briefings; New student training programme on QA (2025); Comprehensive expert performance evaluation system pilot (2024); Draft Concept for Modernising EQA System; Three-stage pilot on post-accreditation monitoring
Check	Monitoring and evaluation of implementation through surveys, focus groups, expert performance reviews, internal system analysis, and open discussions. Feedback is systematically collected from internal and external stakeholders to identify strengths and areas for improvement. The findings inform evidence-based decision-making, support future planning (Plan), and guide refinement of procedures (Act).	Annual stakeholder surveys (HEIs, experts, students); Internal monitoring of the effectiveness of the internal QA system (IQA); Evaluation of expert report quality; Discussion of the draft Concept for EQA System Modernisation (2024–2025); Analysis of the results and process of the post-accreditation monitoring pilot; Consideration of conclusions from external partners and the Advisory Board.

Cycle Element	Description	Examples (2023–2025)
Act	Adjustments, improvements, or revisions to documents, procedures, tools, and training programmes based on the results of monitoring and analysis. Decisions are informed by the data and recommendations gathered during the Check phase, as well as feedback from process participants. All changes are documented, approved, and integrated into the next Plan–Do–Check–Act cycle, ensuring sustainability and strategic development.	Following the implementation of List of Major Drawbacks (2024), NAQA conducted an in-depth analysis of its application, including surveys among experts and SEC members. The findings confirmed that the tool is effective in structuring analysis and helps ensure consistency. As a result, the relevant instructions and templates were updated to support thematic analysis. A need to strengthen specific formulations was identified and is being addressed. Additional improvements were based on implementation outcomes: training programmes and briefings were updated & training for SEC chairs including module on the use of templates was conducted. NAQA also finalised the Concept for Modernising the EQA System, enhanced tools for post-accreditation monitoring, and updated the online course for expert candidates (LMS Moodle, 2025)
Continuous Improvement	The entire PDCA cycle ensures coherence between planning, implementation, analysis, and adjustment. The PDCA methodology is embedded into NAQA's internal quality assurance system. The cycle is repeated annually and serves as a basis for strategic decision-making and long-term system development.	Integration of international good practices, Advisory Board recommendations, and modernisation goals into planning for 2025–2027

NAQA's internal quality assurance system is built upon the Plan–Do–Check–Act (PDCA) methodology, ensuring that each decision is evidence-based, each implementation is purposeful, and each result leads to further system improvement. The cyclical nature of PDCA enables NAQA to not only respond to current challenges but also proactively evolve based on lessons learned and stakeholder feedback.

Annex K. Evaluation of Expert Work Quality

Aspect	Description / Results
Commission Establishment	Established in July 2023 to assess expert performance and potential violations affecting evaluation quality.
Grounds for Removal	1. Procedure non-compliance 2. Ignoring instructions 3. Repeatedly inaccurate evaluations 4. Lack of recommendations 5. Unsubstantiated conclusions 6. Integrity violations 7. Refusal or failure to complete training 8. Violation of Anti-Corruption Program
Enforcement Outcomes	As of the end of 2024, 116 experts (1.8%) removed from the Register due to serious or repeated violations; 200 referred for remedial training to strengthen specific competencies.
Remedial Training	As of the end of 2024 Participation: 150 experts Completion rate: 97% Passed final test: 94% Positive trainer feedback: 91%
Key Areas for Development	Use of data in evaluation, application of regulatory standards, and communication in challenging expert situations
Comprehensive Performance Evaluation (May–July 2024)	Performance of 2075 experts (including academic staff and students) was evaluated with a focus on adherence to accreditation procedures and the quality of expert reports. Evaluation sources included: – Peer feedback within expert panels; – Feedback from study programme leaders; – Reviews by sectoral expert councils and NAQA Secretariat; – Video recordings (where written feedback was unavailable). Additional criteria for team chairs: – Timeliness and appropriateness of document requests; – Observance of deadlines for draft/final reports. Criteria for report quality: – Justification of strengths and best practices; – Logical link between identified deficiencies and recommendations; – Incorporation of feedback from the Secretariat in final reports. The pilot evaluation confirmed the overall preparedness and responsibility of most experts, while also highlighting areas for improvement such as deadline compliance, justification of compliance levels, professional ethics, integrity, and conflict management during accreditation.

Annex L. Erasmus+ Projects

Project is important for the creation of an ESG-compliant QA system, which is one of the Bologna Process key commitments

UkraineDigiTrans

Project 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

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

Project focused on introducing a model of personalized learning, based on the virtual learning environment of Intellectual Tutoring "Learning with No Limits"

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 Mode

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

Erasmus+

Co-funded by the European Union

Project 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

Completed at the beginning of 2025. Project aimed to develop and promote the open science and academic integrity

Completed in 2021. It 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

Annex M. Number of Experts According to the Field of Study as of December 2024

Field of study	Number of experts: academic staff	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	n/a
26 Civil security	84	6
27 Transport services	176	17
28 Public administration	112	44
29 International relations	128	39

Annex N. Mapping 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 publicity1 (9.2.).	
1.8 Public information	9. Transparency and publicity (9.1., 9.3.).	
1.9 Ongoing monitoring and periodic review of programmes	8. Internal quality assurance of the study programme (8.1., 8.2., 8.3., 8.4., 8.5., 8.6., 8.7.).	

| 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
1.10 Cyclical external quality assurance		Implemented in: • Law of Ukraine On Education (Articles 46, 48, 49); • Law of Ukraine On Higher Education (Articles 24, 25); • Law of Ukraine On Licensing Types of Economic Activity; • Cabinet of Ministers Resolution No. 1187 of December 30, 2015, On Approval of the Licensing Conditions for Educational Activities of Educational Institutions; • Cabinet of Ministers Resolution No. 347 of May 10, 2018, On Amendments to the Cabinet of Ministers Resolution No. 1187 of December 30, 2015

Sectoral Expert Council Composition

Evaluation by the Selection Committee

Academic Staff

- self-nomination
- at least 1 person for each specialty included in the relevant field of knowledge

Selection criteria:
- experience in higher education quality assurance;
- cooperation with foreign HEIs, participation in international educational projects in higher education quality assurance;
- experience in developing policies in the field of higher education;
- experience in internal higher education quality assurance;
- experience and prominent achievements in teaching;
- experience and prominent achievements in research.

Employers

- nominnominated by an employer organization, an association of employer organizations, or a professional association
- at least 1 for each SEC

Selection criteria:
- experience in higher education quality assurance;
- cooperation with international institutions in the field of higher education;
- experience in developing policies in the field of higher education;
- experience and professional achievements in the relevant field of professional activity;
- experience in cooperation with employers' organizations in Ukraine or abroad in developing documentation on the assignment of qualifications, standards, etc.
- experience in cooperation with HEIs (internal quality assurance procedures).

Students

- nominated by the HEI student self-government body or by the Ukrainian Association of Students and Young Scientists
- 1 for each SEC

Selection criteria:
- experience in higher education quality assurance;
- cooperation with international institutions in the field of higher education;
- experience in developing policies in the field of higher education;
- experience in student governance organizations and/or the National Student Association of Ukraine.

International Experts

- self-nomination
- at least 1 for each SEC

Selection criteria:
- experience participating in accreditation and international projects studying accreditation processes;
- experience as a foreign agency expert in evaluating higher education quality;
- experience in studying or obtaining a scientific degree at a foreign HEI or a research institution;
- teaching or conducting research at a foreign HEI or research institution for at least one semester;
- internships abroad for at least one semester;
- publications in foreign peer-reviewed journals that are cited in scientific databases.

Annex P. NAQA Experts Selection

NAQA Experts Selection

NATIONAL AGENCY
for HIGHER EDUCATION
QUALITY ASSURANCE
(UKRAINE)

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.

Application Submission

The candidate's application must contain the following:
- online application form
- motivation letter
- CV
- proofs of qualification(s)
- document(s) verifying the place(s) of employment or study

Application 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 selection criteria.

Online Course

Shortlisted candidates are required to complete an online course on the accreditation process and the application of ESG standards. At the end of the course, candidates are tested, and a minimum score of **60 points out of 100 is required to progress**.

Training

Candidates who successfully complete the online course and test are invited to participate in a training session.
The training programme includes the following:
- analysing the self-assessment report;
- site visit planning;
- drafting the external evaluation report;
- providing recommendations to a HEI;
- expert's ethics and integrity;
- teamwork & conflict resolution.

Evaluation

Candidates are assessed based on their performance during the training. The uniform scale (1-10) is used. To be included in the Expert Register, candidates must achieve a minimum score of 5.
This evaluation framework consists of the following:
- familiarity with the programme accreditation procedure;
- knowledge of relevant legislation;
- proficiency in external evaluation methods;
- strong analytical skills;
- sharing NAQA values;
- strong communication & management skills.

The Register of Experts

Inclusion of an expert candidate by the NAQA Board's decision.

Annex Q. NAQA Training Programmes for Expert Candidates

NAQA Training Programmes for Expert Candidates

NATIONAL AGENCY
for HIGHER EDUCATION
QUALITY ASSURANCE
(UKRAINE)

1.0 2019

MOOC 1 + test
(accreditation procedure)

➕

2-days F2F training

- simulated study programme self-assessment report analysis
- features of ESG accreditation paradigm
- site-visit planning
- questioning techniques
- meeting simulations
- case-study
- conclusions on meeting the Criteria
- experts ethics & integrity

2.0 2020

MOOC 1 + test
(accreditation procedure)

MOOC 2
(report writing)

➕

2-days online training

Based on the experience of remote sote-visits.
- simulated study programme self-assessment report analysis
- features of ESG accreditation paradigm
- remote site-visit planning
- meeting simulations, final briefing simulation
- case-study
- experts ethics & integrity

3.0 2021

MOOC 1 + test
(accreditation procedure)

MOOC 2
(report writing)

➕

2-days online training

+ online document - **Preliminary Results of the External Evaluation Form (PREE-form)**
- simulated study programme self-assessment report analysis
- remote site-visit planning
- meeting simulations, final briefing simulation
- case-study
- experts ethics & integrity

4.0 2022

MOOC 1
(accreditation procedure)
MOOC 2
(report writing)

Series of video lectures + revised test

➕

1-day online training

- simulated study programme self-assessment report analysis
- accreditation procedures
- site-visit planning
- questioning techniques
- case-study
- evidence-based & data-driven decisions
- experts ethics & integrity

Annex R. Standard 3.4 Thematic analysis

Standard 3.4: Thematic Analysis

NATIONAL AGENCY
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QUALITY ASSURANCE
(UKRAINE)
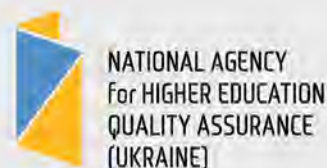
Analytical Framework and Tools

Regular analysis of accreditation results
Multi-source data collection
List of Major Drawbacks & digital analytical tool
Dynamic monitoring and follow-up
Demand-driven thematic research

Integration into practice and policy
Annual Reports, Reviews of HE Quality
Open dissemination of findings
Dedicated analytics unit

| Key Challenges	Addressing the Challenges
Methodology & Concepts	• Use of the List of Major Drawbacks for consistent judgments • Regular updates of guidelines and trainings • Ensuring consistency across evaluations • Balance between flexibility and standardization
Data Management & Digital Infrastructure	• Analytical tools • Unified reports templates • Clear reporting guidelines • Data quality assurance mechanisms • Strengthening digital literacy and cyber hygiene
Human Resources & Analytical Capacity	• Expert and staff training • Building analytical reporting capacity • Workload and tool optimization • Research partnerships
Communication & Use and Influence of Analysis	• Stakeholder-aligned Reports and Reviews on the Quality of HE in Ukraine • Actionable insights for stakeholders and policymakers • Promoting data use through guidance and training • Fostering trust through transparency
War & External Context	• Adaptive procedures for emergency conditions • Data protection assurance • Communicating evaluation as a developmental tool • Fostering trust and shared responsibility

Prepared within the framework of the ERASMUS+ SEQA-ESG 2 project.

Annex S. Standard 3.6 Internal QA and professional conduct

Standard 3.6: Internal quality assurance and professional conduct

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QUALITY ASSURANCE
(UKRAINE)
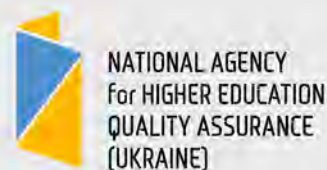
Internal QA Framework and Practices

Clear strategic and regulatory framework
Code of Academic Integrity and Ethics
Continuous professional development and training
Anti-corruption programme &
Risk mitigation measures

Expert performance evaluation
Internal and external feedback mechanisms
Culture of self-assessment &
continuous improvement
Transparent and accountable operational practice

Key Challenges

Methodology & Policies

Ethics, Integrity & Risk Management

Human Resources & Capacity

Feedback & Stakeholder Engagement

Monitoring & Improvement

Sustainability & Resource Planning

Addressing the Challenges

- Three-level IQA model
- PDCA methodology
- Annual self-assessment

- Code of Academic Integrity
- Mandatory declarations of Integrity
- Anti-corruption programme
- Conflict-of-interest checks
- Risk mapping and monitoring

- Ongoing training for staff and experts
- Onboarding
- Workload planning

- Systematic stakeholder feedback analysis
- Diverse stakeholder groups engagement
- Feedback integration for enhancement
- Transparency with respect for confidentiality
- Responsiveness

- Annual ESG-aligned self-assessment
- Impact analysis

- Institutional memory tools
- National Action Plan on QA integration
- Scaling successful pilot practices
- Balanced workload and reduced dependence on individuals
- International partnerships for capacity building

Prepared within the framework of the ERASMUS+ SEQA-ESG 2 project.

NATIONAL AGENCY FOR HIGHER EDUCATION QUALITY ASSURANCE (NAQA)

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

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