NATIONAL AGENCY
for HIGHER EDUCATION
QUALITY ASSURANCE
(UKRAINE)

National Action Plan on Ukrainian external higher education quality assurance for 2022-2023 period

Kyiv ♦ 2022

UDC 378 (477)

CONTENT

1. Introduction

National Action Plan on external higher education quality assurance in Ukraine for 2022-2023 period (Action Plan) was initiated by the National Agency for Higher Education Quality Assurance (NAQA) and concluded with the Verkhovna Rada Committee on Education, Science and Innovation, the Ministry of Education and Science of Ukraine, representatives of students, employees and the other stakeholders. The document had been developed since 2021. However, the situation with the current processes of higher education (HE) quality assurance (QA) in Ukraine is not only extraordinary, but also tragic. Russia's aggression is obviously aimed at the civilians, the bearers of national and civil identity and the humanitarian sphere as the basis of the worldview. Aggressor threatens the lives of children and young people, future and current schoolchildren and students, and the number of victims is constantly growing. The number of damaged educational institutions is more than 1500, and the number of completely destroyed – about 150. Kindergartens, theatres, museums, schools, and residential buildings, as well as, our universities, institutes, academies and colleges are being hit by missiles.

Despite the fact that the ruthless enemy is destroying cities and villages, higher education institutions continue their important work, the educational process, communication and support of academic staff and students are not being paused. Higher education institutions (HEIs) are becoming humanitarian hubs and volunteer centres.

The changes in the regulatory framework offered by the authorities and implemented in the legal framework have provided flexible approaches that have enabled the flow of educational activities, in particular the processes of external HE QA. NAQA is continuing to act during martial law, in particular by carrying out and completing study programmes accreditation. The expert groups completed their reports while individual participants were in the hostilities zone or being evacuated from the shelling zones. Study programmes leaders have

prepared more than 700 packages of documents for accreditation in accordance with the Resolution of the Cabinet of Ministers of Ukraine of 16.03.2022 № 295 "On the peculiarities of accreditation of study programmes for higher education under martial law".

However, it is impossible to overcome the catastrophic damage of the war without reflection on the prospects and a clear idea of the future of Ukrainian higher education, of those who will rebuild a country that has suffered devastating losses – graduates of our higher education institutions. Higher education in Ukraine has now proved that it performs the main function of education in general: educated people in our country are active citizens in a democratic society, share human values, have critical thinking. It is obvious that improvement of HE QA is a strategic direction of public policy, and the National Action Plan of Ukrainian external higher education QA should be one of the steps to build it.

The working group was established to develop this Action Plan including the following stakeholders' representatives:

The Verkhovna Rada Committee on Education, Science and Innovation:

- Serhii Babak, Chairman of the Verkhovna Rada Committee on Education, Science and Innovation;
- Yuliia Hryshyna, Chairperson of the Sub-committee on Higher Education of the Verkhovna Rada Committee on Education, Science and Innovation.

The Ministry of Education and Science of Ukraine:

- Serhii Shkarlet, Minister;
- Andrii Vitrenko, First Deputy Minister;
- Oleh Sharov, General Director of the Directorate of Professional Higher Education.

The National Agency for Higher Education Quality Assurance:

- Andrii Butenko, Head;

- Olena Yeremenko, Vice-Head;

- Bohdan Morklyanyk, Vice-Head;

- Ivan Nazarov, Vice-Head;

- Nataliia Stukalo, Vice-Head;

- Artem Artiukhov, NAQA member;

- Albina Tsiatkovska, Head of Public Relations and International Cooperation Department, NAQA Secretariat.

Public organisation "Union of Rectors of Higher Education Institutions of Ukraine":

- Petro Kulikov, Head, Rector of the Kyiv National University of Construction and Architecture.

Higher Education Institutions:

- Oleksandr Aziukovskyi, Rector of the Dnipro University of Technology;

- Volodymyr Buhrov, Rector of the Taras Shevchenko National University of Kyiv;

- Serhii Kvit, President of the National University of Kyiv-Mohyla Academy;

- Ihor Tsependa, Rector of the Vasyl Stefanyk Precarpathian National University.

Employers' Association:

- Olena Kolesnikova, deputy general director of the Ukrainian federation of metallurgists.

Ukrainian Association of Students:

- Yuliia Rashkevych, Presidential Adviser on Strategic Planning and Development.

2. Ukrainian higher education system

The main goal of the higher education system of Ukraine is to prepare competitive human capital for high-tech and innovative development of the country, self-realisation of the individual, meeting the needs of society, labour market and state in qualified specialists in the conditions of enhanced cooperation of state bodies and business with higher education institutions on the principles of higher education institutions' autonomy, combining education with science and industry.

National higher education system of Ukraine:

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

 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:

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

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

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

3) Study fields and specialties.

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

4) Study programmes.

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

The study programme should contain: a list of educational components; their logical sequence; requirements for the level of education of persons who can start training under this programme; the number of ECTS credits required to complete

this programme; and the expected programme learning outcomes (competencies) that the applicant must master.

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

5) License Terms for educational activities.

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

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

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

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

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

6) Governing bodies in the field of higher education.

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

7) Stakeholders in the educational process.

Stakeholders in the educational process are the following:

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

Since acquiring independence, Ukraine has faced 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.

Thus, in 1990-1991 in Ukraine, according to publicly available data of the State Statistics Service of Ukraine, there were 149 higher education institutions (universities, academies, institutes), which enrolled 881,300 students. Instead, according to the 2021 admission campaign, 651 educational institutions recruited applicants at various levels of higher education (181 are academic institutions).

3. Higher education quality assurance in Ukraine

3.1 Legal framework

The starting point of modern reforms in higher education was the Law of Ukraine "On Higher Education" of 01.07.2014, as amended, which still defines not only the necessary changes in this area, but also causes most professional discussions on the implementation and realisation of its norms. This Law establishes the basic legal, organisational, financial principles of higher education system, creates conditions for strengthening cooperation between state bodies and business with HEIs on the principles of their autonomy, combining education with science and industry to train competitive human capital for high-tech and innovative development of the country, self-realisation of the individual, meeting the needs of society, labour market and the state in qualified specialists.

The above-mentioned Law introduced the need to establish the National Agency for Higher Education Quality Assurance as an independent permanent collegial body. NAQA is a legal entity governed by public law and runs in accordance with the Law of Ukraine "On Higher Education" and the Statute approved by the Cabinet of Ministers of Ukraine. The practical implementation of the Law's requirements was through the Resolution of the Cabinet of Ministers of Ukraine "On the establishment of the National Agency for Higher Education Quality Assurance" of April 15, 2015.

According to the current legislation, some of the powers of the Ministry of Education and Science of Ukraine have been handover to NAQA, including responsibility for accreditation of study programmes, one-time councils for Ph.D. thesis defence, institutional accreditation and accreditation of independent HE quality assessment and QA institutions, considering academic integrity issues, establishment of internal quality assurance systems in Ukrainian HEIs, university rankings that will be formed according to measured criteria, publication of an

annual report on the current situation in higher education, etc. At the same time, the procedure for licensing and monitoring compliance with educational legislation remains the responsibility of the Ministry of Education and Science of Ukraine. In general, NAQA activities are aimed at promoting the HEIs' academic autonomy, their quality growth and international competitiveness.

The first NAQA board was elected in 2015; however, for a variety of reasons it never started its official work. In December 2018, according to the amended Law of Ukraine "On Education", the new composition of NAQA was selected by an International competition commission and approved by the Cabinet of Ministers of Ukraine.

To date, NAQA has gained the capacity to make real changes in higher education. NAQA strategy, developed and approved in 2019, became a guide to the above changes, defined the mission and values, declared the strategic goals and directions of their implementation. NAQA mission – to become a catalyst for positive changes in higher education and the formation of a quality culture – and its activities correlate with the main NAQA powers defined by Ukrainian legislation:

- formation of requirements to the system of HE QA, development of Regulations on accreditation of study programmes in higher education and its submission for approval to the central executive body in the field of education and science;
- analysis of the quality of educational activities of HEIs;
- institutional accreditation;
- formation of a united database of specialties introduced by HEIs, which are used to train higher education applicants at each level of higher education;
- study programmes accreditation;

- formation of criteria for assessing the quality of educational activities, including scientific achievements, Ukrainian HEIs, which can determine the ratings of higher education institutions in Ukraine;

- development of the procedure for awarding the degree of Doctor of Philosophy and cancellation of the decision of the one-time council of HEI, academic institution on awarding the degree of Doctor of Philosophy and its submission for approval to the central executive body in education and science;

- accreditation of independent HE quality assessment and QA institutions, maintenance of their register, etc.

According to the Law of Ukraine "On Higher Education", NAQA consists of 23 persons. The membership of NAQA is formed with no more than one person from each subject field; it includes three representatives of all-Ukrainian associations of employers' organisations; two persons from among students of the first and second cycle of higher education; no less than one representative from each of the following: the National Academy of Sciences, each of the national sectoral academies of sciences (one representative from each academy), state, communal and private HEIs. The term of NAQA members' mandate is three years. The same person may not be a member of NAQA for more than two terms.

NAQA members operate on the basis of openness and transparency. Forms of work of NAQA members are:

- participation in NAQA meetings;

- acquaintance and processing of accreditation cases, which are put to the vote during NAQA meeting;

- participation in accreditation examination as an observer;

- participation in working groups for the regulation's development and their approval;

- acquaintance and elaboration of draft decisions of the Ethics Committee and/or the Appeals Committee, which are put to the vote during NAQA meeting;

- acquaintance and elaboration of draft higher education standards, which are submitted for approval at NAQA meeting;

- advising members of sectoral expert councils (SEC), in accordance with the division of responsibilities between NAQA members, approved by NAQA;

- work in committees and competition commission for the selection of members of sectoral expert councils;

- participation in the development of proposals for NAQA consideration for accreditation processes' improvement (external HE QA), academic integrity assurance, accreditation experts' activity, trainers, SEC, Secretariat;

- expert activities (including international) aimed at promoting NAQA processes and values in the academic community, including: speeches at conferences, seminars, round tables, symposiums, trainings, publication of articles in the press and scientific journals, publication of texts on electronic resources, monographs, etc.;

- approval of local acts and appointments to NAQA Secretariat;

- other functions defined by the legislation.

Each NAQA member has the right to participate in the preparation, discussion and adoption of NAQA draft decisions, to express in writing his dissenting opinion.

NAQA interacts with the Verkhovna Rada of Ukraine, the Cabinet of Ministers of Ukraine, the Ministry of Education and Science of Ukraine, other central and local executive bodies, the National Academy of Sciences of Ukraine and national sectoral academies of sciences, local governments, public associations,

enterprises, institutions and organisations, with academic institutions and higher education institutions of foreign countries, as well as with international organisations in the field of higher education. The result of such interaction is, in particular, participation in the development of legislative changes in the higher education and academic sphere, implementation of all accreditation types, creation of the academic integrity environment, etc.

Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG-2015) are taken into account in the development of legal framework for the national higher education quality assurance system and are the basis of regulations and methodology of the accreditation process.

3.2 Compliance with Standard 3.3 ESG-2015 "Independence"

The current legislation of Ukraine contains norms that are aimed at ensuring NAQA independence and meet the standards of ESG-2015.

NAQA organisational independence is attested at the level of all regulations adopted by the Parliament, the Government or the Ministry of Education and Science of Ukraine in issues of NAQA formation, organisation of work, the exercise of powers, activities, etc. For example, NAQA members are selected through competitive selection, in accordance with the principles of gender balance and sectoral representation, conducted by an independent commission. Based on the decision of the Competition Commission (which includes international members), NAQA members are appointed by the Cabinet of Ministers of Ukraine.

Organisational, financial, economic, logistical, information, technique and other support for the activities of NAQA are provided by the NAQA Secretariat.

Operational independence enables NAQA to either independently develop and approve procedures for the exercise of its powers, or to develop relevant draft documents and submit them for approval to the Ministry of Education and Science of Ukraine or to the government. For example, in accordance with the Law of

Ukraine "On Higher Education", NAQA independently formulates requirements for HE QA system, forms criteria for the quality of educational activities' assessment, including scientific achievements, HEIs of Ukraine, which can determine the ratings of higher education institutions in Ukraine. NAQA develops the regulations on accreditation of study programmes in higher education and submits it for approval to the central executive body in the field of education and science, etc. In addition, NAQA annually prepares and publishes a report on the quality of higher education in Ukraine, its compliance with the objectives of sustainable innovative development of society, report on its own activities within which NAQA has the right to formulate proposals for HE QA legislation and send these documents to the Verkhovna Rada of Ukraine, the President of Ukraine, the Cabinet of Ministers of Ukraine and HEIs for discussion and response. Thus, in 2020-2021 NAQA developed and sent to the responsible entities for adoption and approval: amendments to the Law of Ukraine "On Higher Education", "On Education" and other educational laws on accreditation, NAQA powers and the procedure for their implementation, strengthening the status' independence; draft Law of Ukraine "On Academic Integrity" and draft amendments to other laws in order to create academic integrity environment; developed and sent for approval a new version of the Regulations on accreditation of study programmes in higher education, draft Regulation for awarding the degree of Doctor of Philosophy and cancellation of the decision of the one-time council of a HEI, academic institution on awarding the degree of Doctor of Philosophy (approved on 12.01.2022), draft Regulation for institutional accreditation of HEIs, draft Regulations on accreditation of independent higher education quality assessment and quality assurance institutions and other documents.

One of the important elements of ensuring operational independence is a three-stage examination procedure: work of the expert panel directly in the HEI with submission of the expert panel report to the NAQA information system,

verification of the expert opinion by the sectoral expert council and adoption of the final decision by NAQA. Especially important here is the person of the expert, who in accordance with the Regulations on accreditation of study programmes in higher education and the Regulation for selection and maintenance of the NAQA Register of Experts, must meet not only professional criteria, but also academic integrity requirements. It should be noted that in accordance with the Regulations on accreditation of study programmes in higher education, experts are appointed among those from NAQA Register, taking into account the subject area, absence of conflict of interest, experts' ability to participate in the procedure. Such appointment is made independently from the third parties and is published at the NAQA website.

In order to improve the work with the experts, NAQA has created a new information system "Experts" https://experts.naqa.gov.ua. The information system was developed to store and record data from the Register of Experts, to optimize communication between experts, NAQA representatives and stakeholders, as well as to implement a comprehensive and objective evaluation of the experts' activities. Information system "Experts" provides for the creation of a personal account, where the expert can submit, update and view information about his/her activities as NAQA expert. All personal data and full information about the expert are available only to the responsible NAQA employees.

Openness of processes and procedures is a component of operational independence. To interact with institutions, experts and other participants, NAQA uses its own information system (IS), which makes the entire accreditation process open and accessible to all stakeholders. The entire accreditation procedure – from the submission of an application for study programme's accreditation by a higher education institution to the adoption of a final decision at NAQA meeting, as well as the possibility of appeal against this decision are gradually reflected in the system. Expert reports and conclusions of sectoral expert councils,

as well as documents that contain feedback from universities – responds to them, are downloaded to the system. The system is designed to prevent corruption risks, preventing corrections and interventions. The public interface, which in 2020 complemented the unique information system (online platform), allowed everyone to access all documents of accreditation cases (https://public.naqa.gov.ua/), which testifies to the unprecedented transparency of NAQA's policy. There is no similar online system in any country of the European Higher Education Area (EHEA). In modern Ukraine, such openness is simply necessary to build new procedures of higher education quality assurance.

Independence of official conclusions. NAQA decision may be appealed by a higher education institution in accordance with the regulation established by NAQA, which should be made publicly available. Based on the results of the appeal review, NAQA makes a reasoned decision. Appeals against NAQA decisions are considered by the Appeal Committee, which is a NAQA structural unit and consists of five its members. Based on the results of appeal review, Appeal Committee may reasonably recommend NAQA to leave unchanged or cancel the appealed decision. Appeal Committee's decisions are obligatory for NAQA's consideration. An alternative to appealing NAQA decision is taking it to court. No other state body, organisation or higher education institution may change or revoke NAQA decision, in particular on accreditation.

Unfortunately, not all provisions of the Law of Ukraine "On Higher Education" regarding NAQA independence are interpreted equally by law enforcement entities. Some state regulatory bodies are trying to build relationships and interactions with NAQA as a state body, where employees have a status of civil servants. Given the understanding of the ESG-2015 requirements, regarding the need to ensure NAQA independence from the government, higher education institutions or any other organisation, current NAQA composition defends the position that it is impossible to transfer NAQA members and Secretariat

employees to the status of civil servants, as this would contradict with European standards.

3.3. Higher education quality assurance activities and its methodology.

The national legislation of Ukraine defines higher education quality as compliance of the conditions of educational activity and learning outcomes with the requirements of the legislation and higher education standards, professional and/or international standards (if any), and the needs of stakeholders and society, provided through internal and external quality assurance procedures that is fully in line with the ESG-2015.

The higher education quality assurance system in Ukraine consists of the following:

- internal quality assurance systems in higher education institutions;
- systems of external quality assurance for educational activities of higher education institutions;
- quality assurance systems in NAQA and independent higher education quality assessment and quality assurance institutions.

Internal quality assurance system in higher education institutions provides for the implementation of such procedures and measures:

- defining the principles and procedures of higher education quality assurance;
- monitoring and periodic reviewing of study programmes;
- annual assessment of higher education applicants, scientific, academic and pedagogical staff of higher education institutions and regular publication of the assessment results on the official website of the higher education institution, on information stands and in any other way;

- providing advanced training of scientific, academic and pedagogical staff;

- ensuring the availability of the necessary resources for the organisation of the educational process, including individual work of students, for each study programme;

- providing information systems for effective management of the educational process;

- ensuring information publicity about study programmes, higher education degrees and qualifications;

- ensuring the observance of academic integrity by higher education institutions' employees and higher education applicants, including the establishment and operation of an effective system for the prevention and detection of academic plagiarism and other procedures and measures.

Internal quality assurance system in higher education institutions is assessed by NAQA or by independent NAQA accredited institutions for evaluation and higher education quality assurance for its compliance with the requirements for the higher education quality assurance system approved by NAQA.

In turn, system of external quality assurance for educational activities of higher education institutions involves the implementation of such procedures and measures:

- ensuring the effectiveness of processes and procedures for internal quality assurance system in higher education institutions;

- ensuring the availability of external quality assurance procedures system;

- ensuring the availability of published decision-making criteria in accordance with ESG;

- establishing accessible and clear reporting;

- conducting periodic inspections of the quality assurance systems and mechanisms for working with the received recommendations as well as other procedures and measures.

Quality assurance systems in NAQA and independent higher education quality assessment and quality assurance institutions involves the implementation of such procedures and measures:

- ensuring the availability and effectiveness of processes and procedures for external higher education quality assurance;
- ensuring the availability of sufficient and balanced resources for the implementation of external higher education quality assurance processes;
- ensuring independence in the activities of NAQA and independent higher education quality assessment and quality assurance institutions;
- accountability, etc.

NAQA conducts activities on external higher education quality assurance, in particular the accreditation of junior bachelor`s, bachelor's, master's and doctoral (doctor of philosophy) study programmes.

Regulations on accreditation of study programmes in higher education determines the basic principles and procedure for study programmes accreditation, as a tool for external quality assurance of higher education in Ukraine. Mandatory conditions for accreditation are compliance of the study programme and educational activities of the higher education institution under this study programme with the criteria for assessing the study programme quality, defined by NAQA and confirmed by the Ministry of Education and Science of Ukraine (of 11.07.2019 № 977).

Certain features of study programmes accreditation and NAQA activities in general emerged during the COVID-19 pandemic and national quarantine, when

all public events were restricted. NAQA responded immediately to these challenges: employees switched to remote work, internal meetings of NAQA members and Secretariat were regularly held online, and all planned work was carried out. NAQA was one of the first in the world to conduct remote accreditations.

During the first two weeks of the nationwide quarantine, NAQA developed and implemented a "Temporary Regulation for Accreditation Site Visits using Video Communications". NAQA acts in line with the governmental regulations and recommendations. For example, in 2021, 1,844 accreditation examinations were conducted, 1,809 of which – in remote format, 24 in mixed format, 11 in on-site format, while from March 26 to July 1, 2020, about 400 online accreditations were conducted.

In total, from November 2019 to April 2022, NAQA conducted 3,784 accreditation examinations, including 2,877 accredited cases, 92 accredited as "exemplary", 758 accredited conditionally, and 57 – denied accreditation.
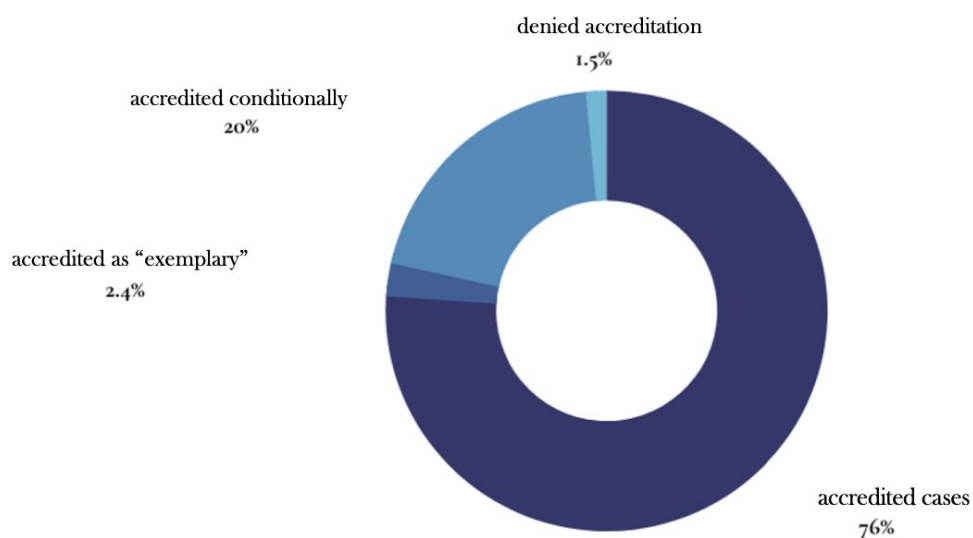
Preliminary briefing of expert groups, visits to HEIs, communication with stakeholders, university administration, meetings of sectoral expert councils in accordance with the Temporary Procedure are held online. In addition, all participants noted that the quality of accreditation examination remains high. 78% of experts confirmed that the results of online evaluation are the same or even better than the results of face-to-face evaluation.

Accreditation methodology. NAQA bases its activities on the principles of trust and mutual exactingness, aiming to disseminate them in the Ukrainian academic environment. These principles should lay the foundation for the reputational capital of Ukrainian higher education institutions, along with a new culture of quality and integrity in line with European best practices and ESG-2015. In the process of accreditation, NAQA performs not a punitive but service function, implementing the paradigm of consultative evaluation and assisting HEIs in their pursuit of excellence. For this purpose, a constant dialogue and fruitful cooperation has been established.

Methodological guidelines for the application of the Criteria for evaluating the quality of study programme were developed for NAQA Experts in 2019 and 2020.

It should be noted that based on the results of the first year of accreditation under the new system, expert surveys, feedback from representatives of higher education institutions, as well as pandemic challenges, NAQA developed proposals for amendments to the Regulations on accreditation of study programmes in higher education to legalise remote and mixed forms of accreditation examination, reduction of the cost of accreditation, further improvement of the accreditation procedure and criteria for evaluating the quality of study programmes, as well as bringing Regulation on accreditation in line with changes in Ukrainian legislation in recent years.

Accreditation process pursues two inseparable goals:

- to impartially assess the extent to which the study programme and its implementation activities meet the Quality Criteria established by NAQA;

- to provide advising to the institution and the programme on further improvement.

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

- international experts are not involved in the expert groups that conduct accreditation examinations;

- there are cases when NAQA has to return the opinion of the sectoral expert council to establish clear and detailed justifications for changing assessments previously provided by the expert group;

- the reports of some expert groups do not provide enough guidelines for the HEI to improve the educational process or the guidelines are too general in nature;

- the competence of some study programmes leaders in educational legislation needs to be significantly improved to understand the requirements of high-quality modern approaches to educational process organisation, based on the requirements of ESG-2015;

- the need to improve the system of professional development of experts;

- the need to unify the requirements and approaches of different SEC.

3.4. Criteria for external higher education quality assurance and its implementation in the NAQA activities.

According to the Law of Ukraine "On Higher Education" the system of external quality assurance of educational activities and quality of higher education in HEIs

must ensure the availability of published decision-making criteria in line with ESG-2015. NAQA is responsible for development of criteria for assessing the quality of educational activities of HEIs in Ukraine. To meet the requirements of the Law, the criteria for assessing the quality of study programme and educational activities under such a programme are defined in the Regulations on accreditation of study programmes in higher education, approved by the order of the Ministry of Education and Science of Ukraine dated 11.07.2019 № 977, registered with the Ministry of Justice of Ukraine on 08.08. 2019 for № 880/33851.

To assist in the practical application of the criteria for assessing the quality of study programme, NAQA has developed Guidelines that draw attention to the principles of Criteria's application:

1. **The principle of respect for higher education institution autonomy.** The accreditation procedure takes into account institutional autonomy. NAQA, accreditation experts, and members of sectoral expert councils cannot dictate to higher education institutions how they should organize their internal academic processes. The ways in which different institutions meet the requirements of a certain criterion can be quite divergent and differ from traditional practices.

2. **The principle of context.** The criteria should be applied according to the specific context of study programme.

3. **The principle of taking into account the opinions of stakeholders**. The application of this principle allows higher education institutions to bring study programme closer to the needs of the labour market and students expectations. At the same time, it is necessary to remember the importance of the institution's mission in the formation of a harmonious personality, a conscious citizen and the ability to self-development, innovation and research.

4. **The principle of analyticity and evidence**. All participants of the accreditation process should provide rational explanations based on the analysis of the decisions

made and the facts presented, taking into account the context, relevant objectives and goals.

The criteria for the quality of study programmes assessment are formulated as follows:

1. Design and objectives of study programme;
2. Structure and content of study programme;
3. Access to study programme and recognition of learning outcomes;
4. Teaching and learning according to study programme;
5. Control measures, evaluation of higher education applicants and academic integrity;
6. Human resources;
7. Learning environment and material resources;
8. Internal quality assurance of the study programme;
9. Transparency and publicity;
10. Learning through research.

In explaining the content of higher education quality assurance activities, special attention should be paid to the fifth and eighth criteria.

The criteria are applied taking into account the ESG 2015 by all participants of accreditation process: by higher education institution to develop information on self-assessment of the study programme, by NAQA, its sectoral expert councils and experts during accreditation.

The evaluation of study programme and educational activities under the study programme is carried out according to each criterion and evaluation scale, which covers four levels of compliance: "F", "E", "B", "A". At the same time, the Regulation emphasises that higher education institutions are obliged to promote accreditation and act in good faith in relations with NAQA, its sectoral expert councils and experts.

A higher education institution, which intends to accredit study programme should submit to NAQA the following materials for accreditation in electronic form:

1) application for study programme accreditation;

2) approved in the prescribed manner study programme and curriculum for this programme;

3) information on self-assessment of the study programme, in accordance with the Criteria and documents confirming the information provided in it;

4) reviews and feedback from employers (if available).

Accreditation materials are submitted electronically via the NAQA online accreditation system. All documents related to accreditation are formed into an accreditation file, which is stored in electronic form. If the accreditation file contains information that is a state secret or confidential information, access to such information is allowed only in the manner prescribed by law.

Within five business days of the date of registration of the accreditation application, an expert panel tasked with performing the accreditation audit is established by an order of the Chairman of NAQA; the timetable for the expert panel's work is scheduled, including dates for its visit to the higher education institution and deadline for submission of the expert panel report. An expert panel for the accreditation audit of a study programme consists of a head and two experts, including one expert from higher education applicants. In case of simultaneous accreditation of two or more study programmes within one specialty or interdisciplinary study programmes, expert group's composition may be expanded, but not by more than one expert for one programme. Based on the submission of the organisation (association) of employers, professional association, a representative of employers may be involved in the work of the expert group (by consent).

Accreditation examination includes:

1) review by the expert group of information on self-assessment, attached materials, as well as all other materials and information related to study programme and the activities of higher education institution under this programme;

2) expert group's visit to the higher education institution, in order to clarify the facts indicated in the information on self-assessment, interview of stakeholders regarding the study programme and activities of higher education institution under this programme, formation of recommendations for improving the quality of educational activities under this programme;

3) compiling a report on the results of accreditation examination.

The report on the results of accreditation examination is submitted to NAQA by the head of the expert group.

NAQA Secretariat provides access to the materials of the accreditation case to the members of the relevant sectoral expert council for preparation of the expert opinion. The accreditation case and the draft expert opinion are considered at the SEC meeting, which adopts one of the following decisions:

1) on approval of the expert opinion by the SEC and referral of the accreditation case for NAQA consideration;

2) on submission to NAQA of a substantiated proposal for the appointment of a re-accreditation examination.

SEC's expert opinion or proposal for the appointment of a re-accreditation examination is considered on NAQA meeting.

Based on the results of reviewing the materials of the accreditation case with the SEC's expert opinion, NAQA has the right to decide on the accreditation of the

study programme, exemplary accreditation, conditional (deferred) accreditation, denial of accreditation or re-accreditation examination.

Accreditation certificate is issued for the first time for a period of five years, and during the second and subsequent accreditations – for a 10 years period. The validity of the decision on conditional (deferred) accreditation is 1 year.

To ensure openness and transparency of the accreditation process:

1) the following is published on the official website of the higher education institution:

- information on self-assessment of the study programme;
- decision on accreditation or refusal to accredit the study programme, expert opinion of the relevant SEC, report of the expert group;

2) the following is published on the official NAQA website:

- order on approval of the composition of the expert group for the accreditation examination;
- decision on accreditation or refusal to accredit the study programme, expert opinion of the relevant SEC, report of the expert group.

According to the Law of Ukraine "On Higher Education" institutional accreditation and accreditation of independent higher education quality assessment and quality assurance institutions are among NAQA powers. NAQA has developed drafts legislation that should regulate the content, procedure and grounds for the above-mentioned types of accreditation and after their approval by the government will begin the implementation of relevant activities.

Formally, the norms of study programmes accreditation in Ukraine are in line with ESG-2015. At the same time, almost 3 years of study programmes accreditation provided an opportunity to identify shortcomings in current legislation governing the relevant processes and to formulate proposals for their elimination.

3.5. Quality assurance of NAQA's activities.

NAQA's Self-Assessment Report (SAR) states that the internal quality assurance of its activities takes place through the implementation of a wide range of defined principles and procedures in accordance with ESG Standard 3.6.: "Internal quality assurance and professional conduct". Such principles and procedures are:

- performance management and accountability;

- assurance of internal control;

- equality;

- informational security and accessibility;

- avoiding conflicts of interest;

- feedback and reflection mechanisms;

- critical self-assessment.

The Regulations on the NAQA Quality Assurance System define the three-level management structure.

Strategic level:

- management of the NAQA Strategy implementation;

- information, reputation and resource management;

- ensuring the effectiveness of processes and procedures of higher education quality assurance.

Tactical level:

- informatisation management;

- ensuring the availability of sufficient and balanced resources for the implementation of higher education quality assurance processes;

- monitoring and reviewing of NAQA procedures and processes.

Operational level:

- analysis of the effectiveness of NAQA processes and measures;

- continuous improvement of external higher education quality assurance
  processes in cooperation with stakeholders;
- accountability.

The set of measures for quality assurance of NAQA's activities is reflected in the annual reports, which are publicly available.

3.6. Principles and criteria for selection, training and inclusion in the Register of Experts.

NAQA does not carry out all stages of study programmes accreditation independently, but with the help of experts and members of sectoral expert councils as an important and mandatory element of accreditation procedures.

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

Experts are selected from among scientific, academic and pedagogical staff, as well as higher education applicants. Experts are trained by NAQA. All candidates for NAQA Experts are required to successfully complete the training for further approval in the Register of Experts, including: two online courses on the Prometheus platform – on the accreditation process and evaluation criteria and on writing a quality report on the examination results. Successful testing on this platform is mandatory. After that each candidate undergoes a two-day intensive training.

The training program is intensive, includes two full days of classroom work (about 16 astronomical hours) with previous homework. An important goal of the training is to communicate NAQA values and ethical standards of expert's

conduct. The programme includes exercises on analysis of self-assessment information, identification of the necessary evidence, preparation of visit programme by participants, holding a meeting with stakeholders, holding a briefing to consult the institution, writing a report and comparing it with the report of other participants and SEC's opinions. Participants also simulate the work of an expert in a higher education institution and discuss 18 real-life situations (cases) faced by experts.
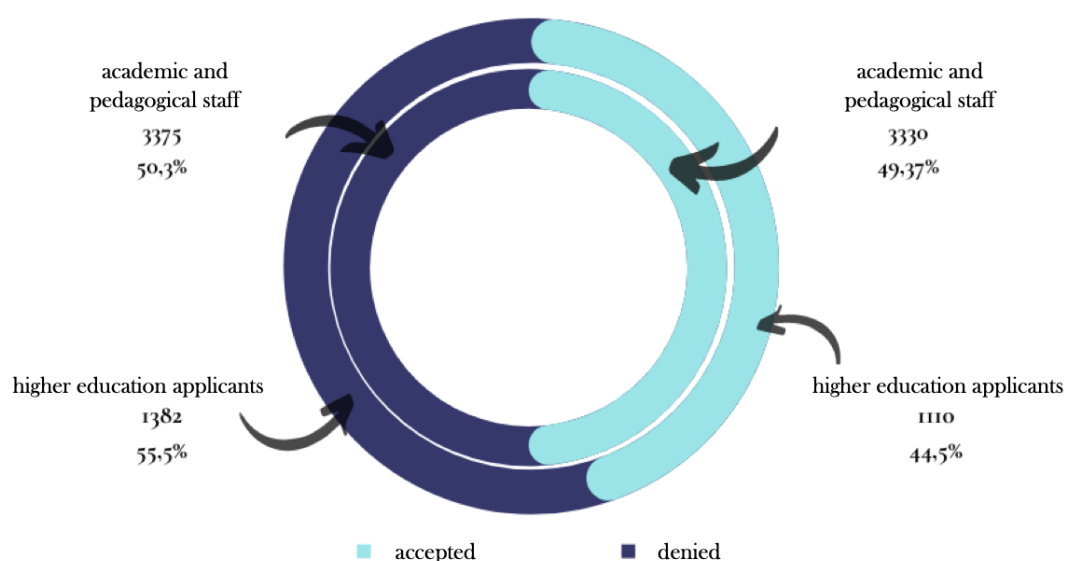
A NAQA member and an employee of NAQA Secretariat are involved in each training to ensure a bilateral dialogue with the candidates for experts and to provide the most comprehensive answers to all questions of the participants.

The intensity of filling Register of NAQA Experts can be demonstrated by the example of annual work in this direction. In 2021, 1,672 new applications were received from candidates for NAQA Experts, 1,198 of which were received from scientific and academic staff and 474 – from higher education applicants. In 2021, 52 trainings were conducted with pre-selected candidates. In total there were 1,497 participants of the trainings. During 2021, the Register of NAQA experts was replenished with 1,495 persons (1,094 scientific and academic staff and 401 higher education applicants).

The quality of work, including its ethical aspect, is important to NAQA, so the composition Register of Experts is periodically adjusted. Thus, a total of 276 experts were excluded from the Register by NAQA decision, 23 of them for ethical reasons.

Experts are included in the Register of NAQA Experts, established in accordance with the Procedure for selection of the NAQA Experts for study programmes accreditation, approved by NAQA decision from May 21, 2019 (Minutes № 5).

The Register of NAQA Experts as of the beginning of May 2022 included 4440 people, 3330 academic, scientific staff and 1110 – higher education applicants of various levels. In total NAQA Secretariat processed 9197 applications: 6705 of academic staff, 2492 – of higher education applicants. Totally – 9197 applications.

academic and pedagogical staff
3375
50,3%

academic and pedagogical staff
3330
49,37%

higher education applicants
1382
55,5%

higher education applicants
1110
44,5%

■ accepted   ■ denied

Experts work on the basis of civil law agreements with NAQA and during the examination act on behalf of NAQA and not of higher education institution in which they work/study. Expert performs an accreditation examination and compiles a report based on its results.

In 2020, NAQA conducted three surveys of experts to provide systematic self-assessment, get feedback and proposals from experts, identify the possible urgent problems in the accreditation process, as well as to obtain feedback from experts on the work of their colleagues. The first survey (which coincided with the first weeks of nationwide quarantine) involved 67 experts; second – 646; third – 901

experts. All questionnaires were carefully analysed to understand the direction of further improvements. The results of each survey consistently highlighted the experts' high appreciation of the accreditation process in general, as well as the usefulness of the set of trainings offered by NAQA. During 2020, many new activities and updates were added to the expert training package: a new training course on writing a report, an updated two-day training program for experts, 32 briefings on the eve of accreditation examinations, webinars and other events to support experts and regular dialogue.

In October 2021, NAQA Experts Department launched a weekly survey of study programmes leaders in order to obtain feedback on the quality of expert groups, NAQA support, as well as possible ways of further development. Study programme leaders were surveyed once a week after the completion of examinations, which allowed to obtain answers before publication of the report and to avoid the possible impact of evaluation in the final report on the objective expert group's assessment by the leaders of study programmes. As of the beginning of December 2021, responses had been received from 137 study programme leaders. The surveys showed that study programme leaders (being the HEIs representatives) highly scored the new accreditation process (8.6 points) and the quality of expert groups' work (9.3 points out of 10 possible). Also, 98.5% of respondents said that they did not have any conflict situations while working with the expert group. During 2021, three waves of regular surveys of experts were conducted to obtain feedback, identify possible suggestions for ways to improve, systematic self-assessment, and to receive expert feedback on the work of their colleagues in expert groups. During the first wave of the survey, which included the period from January to April 2021, 1,299 questionnaires were obtained and analysed. In the second wave, questionnaires were received and processed from 702 experts, who participated in accreditation examinations from May to August 2021. The third survey was conducted from September to November 2021, 925

questionnaires were received. These surveys showed the enhance of accreditation process perception by the experts compared to the results obtained after the previous year's surveys. The assessment of the experts training and the training for the heads of the expert groups and updated training for experts (this year innovation) – remains consistently high throughout 2021.

Sectoral expert councils (hereinafter – SEC) are permanent NAQA bodies. They are formed of 9 to 15 members, in accordance with the Regulations on sectoral expert councils and are selected on the basis of a competition, in accordance with the Regulation for nomination of candidates and selection of sectoral expert councils' members. The main function of SEC is to process accreditation cases and prepare expert opinions on the possibility of study programmes accreditation, in accordance with the procedure defined by the Regulations on accreditation of study programmes in higher education.

Other SEC's functions include:

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

As of May 3, 2022, SEC considered 3940 accreditation cases, developed and approved 176 draft higher education standards, including 58 draft higher education standards for the first (bachelor's) level of education, 92 draft higher education standards for the second (master's) level of education, 26 draft standards of doctor of philosophy.

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

As of the end of 2020, NAQA has created and staffed 30 sectoral expert councils. The actual number of SEC members is 340, who were trained during remedial seminars and trainings conducted by NAQA and partners organisations.

SEC members were involved in 35 methodological and scientific-communicative events (trainings, seminars, webinars) during 2020-2021, including events for experts and SEC members – 17, for SEC members – 5, for newly elected SEC members – 2 , joint webinar of NAQA with the participation of higher education sectors of the Ministry of Education and Science of Ukraine Scientific and Methodological Council and SEC on development and approval of higher education standards – 1, SEC webinars on higher education quality assurance for industry representatives – 10.

It should be noted that NAQA is actively working on the involvement of international experts in the Register of NAQA Experts and in sectoral expert councils. Meetings with international partners were held to address this issue. This process was suspended due to the beginning of russian aggression.

3.7. The engagement of stakeholders in the external higher education quality assurance system.

NAQA composition: 23 members, including 12 representatives of state higher education institutions, 1 representative of a municipal higher education institution, 1 representative of a private higher education institution; 6 representatives of national academic institutions, 3 – employers and 2 represent students. However, stakeholders' participation is not limited to NAQA

composition. This principle has been the basis of most of NAQA decisions and approaches implemented by NAQA over the past year and a half. Accreditation procedures are based clearly on this concept. For example, visits to higher education institutions are always conducted by two or four representatives of academic staff and one representative of students, so the initial quality assessment is always carried out through the perception of stakeholders. To ensure this rule, there are 1,110 higher education applicants of various levels in Register of NAQA Experts. The second stage of the procedure is conducted by sectoral expert council, which consists of academic staff, employers and students. Each SEC consists of 9-15 members, including academics, 1-2 employers' representatives and 1 representative of higher education applicants' representative.

The procedures being developed, namely institutional accreditation and regulatory frameworks for independent higher education quality assessment and quality assurance institutions, will also take this principle into account.

It is worth mentioning, that according to legislation NAQA cooperates with the Cabinet of Ministers of Ukraine, Ministry of Education and Science of Ukraine, other central and local executive authorities, the National Academy of Sciences and national sectoral academies of science, local government bodies, public associations, enterprises, institutions and organisations, academic institutions and institutions of higher education of foreign countries, as well as international organisations in the field of higher education.

In addition, given that ESG Standard 3.7 provides for cyclical external review of the agency and recognizing the importance of this process for building quality culture, NAQA conducted self-assessment and constantly consults national and international experts for evaluation of its policies and procedures. During September-October 2020, NAQA received feedback and reviews from both Ukrainian and international experts, organisations and other stakeholders.

Besides, at the end of 2020, the International NAQA Advisory Board was established, which includes leading foreign experts – recognised experts in higher education quality assurance and academic integrity from the UK, Sweden, France, Poland, Czech Republic, Cyprus and Georgia, USA. Three members of the Advisory Board are members of the working group on accreditation of independent higher education quality assessment and quality assurance institutions in Ukraine, which composition is approved by the Ministry of Education and Science of Ukraine.

Since January 2021, six full meetings and three working meetings in subgroups have been held. The subgroups of the Advisory Board consist of several members of the Board (experts in a specific field), NAQA members and NAQA Secretariat employees. The subgroups are working on development of policies and procedures related to NAQA activities and improvement of existing practices. Thus, a subgroup was formed to work on academic integrity issues, the subject of which was, among other things, the draft Law of Ukraine "On Academic Integrity". The second subgroup focuses on institutional accreditation in Ukraine. The third subgroup deals with the accreditation of independent higher education quality assessment and quality assurance institutions in Ukraine. Working in subgroups allows to study a specific issue more deeply, get expert opinions of Advisory Board members and form a general concept of further movement in a particular direction. The results of subgroups' work are also discussed at the Advisory Board meeting.

Advisory Board members are willing to provide comments and suggestions on issues included by NAQA in the Advisory Board agenda. Topics for consultation included: analysis of NAQA self-assessment report; involvement of foreign experts in expert groups; NAQA membership in ENQA and other opportunities for NAQA internationalisation and the higher education system in Ukraine; NAQA institutional independence according to the ESG standard; cross-border

higher education quality assurance; work during pandemic; NAQA sustainable development, etc. Advisory Board members' consultations provide an opportunity to get a vision of one issue (or aspect of activity) from different angles and develop the best solution in the current environment, as well as to obtain external evaluation of procedures, processes, draft documents developed by NAQA.

Advisory Board members also joined the discussion of the results and summarising of NAQA activities for the period 2019-2021, which took place in September 2021. They praised NAQA's achievements over the years and outlined recommendations for further work.

4. Priority areas of the Action Plan.

NAQA implemented the key tasks of early 2019 in record time: developed a number of regulations and methodological materials and is conducting a new accreditation process; trained and formed the Register of Experts; created sectoral expert councils; accredited more than 4026 study programmes. It should be noted that in a relatively short time NAQA became an ENQA Affiliate and a full member of INQAAHE, CEENQA, ICAI. Today in accordance with the current legislation of Ukraine NAQA is an independent collegial body. At the same time, NAQA is aware of the challenges it has to overcome and take into account in further development.

1. **External higher education quality assurance during and after martial law.**

With russia's full-scale military invasion of Ukraine, Ukraine's higher education system has faced a number of serious problems, including the abduction and persecution of educators, scientists, students, the destruction of university infrastructure and forced relocation of large numbers of lecturers and students to safer regions and abroad, HEIs' evacuation from zones of hostilities and occupied territories, difficulties in conducting classes in conditions of constant air raids, shelling and missile strikes, deterioration of the psychological well-being of lecturers and students. A separate problem is the forced transfer of HEIs' educational activities in the occupied territories to the standards of russian federation with the forced change of language of teaching, distortion of factual material, distortion of values. At the same time, NAQA has not ceased its activities and is fully fulfilling its functions, as well as strengthening its consultative and communication role. Ensuring flexibility and relevance to the time requirements of external quality assurance procedures is one of the main NAQA's tasks in martial law conditions.

2. Accreditation of study programmes and educational activities in a COVID-19 pandemic.

This challenge is significant, as in the summer of 2021 NAQA received 2,138 applications for accreditation of study programmes for the new 2021-2022 academic year, and a significant number of applications for accreditation of PhD programmes were postponed to 2021 due to national quarantine. Therefore, accreditation examinations should take place according to plan. NAQA already has significant experience in online accreditation, and is preparing for a new mixed model of accreditation, which will include a face-to-face visit with one or more experts, to respond quickly to new global pandemic challenges. But full-fledged preparation for this challenge requires changes in regulations and the support of the Cabinet of Ministers of Ukraine and the Ministry of Education and Science of Ukraine.

3. NAQA independence.

The current legislation of Ukraine contains several conflicts that can be used to justify the status of civil servants of NAQA Secretariat employees and the formation of appropriate proposals for granting NAQA the status of a central executive body. NAQA has prepared its proposals for resolving the legal conflict in determining its status, as required by the ESG-2015, which are partially taken into account.

4. Methodological factors of accreditation processes.

According to Standard 2.2 ESG-2015, improvement of the external evaluation methodology is a continuous process. NAQA constantly receives requests from stakeholders about the need for more measurable criteria for study programmes evaluation. In addition, there are still some inconsistencies in the interpretation of the assessment criteria between representatives of higher education institutions, experts and members of the SEC. However, these different interpretations allow

for harmonisation of positions and a broad discussion on different approaches to criteria of evaluation. NAQA is actively responding to these challenges, so it is constantly reviewing and improving its recommendations on the criteria for quality of study programmes evaluation, based on proposals from experts, HEIs representatives and other stakeholders. For this purpose, the recommendations for application of evaluation criteria are constantly updated and meetings with different groups of stakeholders are carried out.

5. Employers as the main stakeholders.

Particular attention should be paid to optimising the cooperation of NAQA with student self-government bodies and employers' associations, which are separate target audiences that simultaneously consume educational services of Ukrainian higher education system and do not always have consistent requirements for it. As of today, the following areas have been identified to improve NAQA practice of involving employers' representatives in the process of study programmes accreditation.

Particular attention should be paid to employers, who involve their own resources in the formation of high-tech support in the implementation of study programmes, both through improving the material and technical base of universities and by involving recipients of educational services in early employment during training.

A fuller consideration of the systematic interaction of employers with universities during the entire life cycle of study programme, from its design to the graduation of students and the availability of feedback from the labour market will increase the quality of examination. Improving the procedure for study programmes evaluation, while fully taking into account the position of employers, their interaction with the university, will increase the level of objectivity and impartiality in deciding on the level of quality assurance of educational services.

6. Involvement of foreign experts.

To date, the problem of involving foreign experts in the NAQA quality assurance process remains unresolved. In particular, their participation is necessary in the accreditation examination and consultations of higher education institutions. Developing mechanisms and finding opportunities to involve foreign experts in the work of expert groups would significantly increase the level of expertise and strengthen decision-making independence.

7. Adherence to professional and ethical standards by all participants in accreditation procedures.

To date, more than 4,500 people have been involved in NAQA system (23 NAQA members, 60 Secretariat employees, 35 trainers, 333 SEC members, 3,330 experts – academic staff, 1,110 experts – higher education applicants), who have declared their desire to ensure the quality of higher education in Ukraine, to carry out external evaluation of study programmes, in accordance with the modern accreditation procedure, based on the value approach and European standards ESG-2015. However, not all participants of accreditation process share NAQA values. There are some cases of unprofessionalism and attempts of some experts to conduct audits instead of consultative evaluation. To counteract such cases, a mechanism for more rapid response to violations has already been developed, which requires wider application in practice.

8. Procedures for quality assurance of NAQA activities.

According to ESG-2015 Standards 3.6 and 3.7, all Agencies must implement internal quality assurance processes and undergo external audits at least every five years to demonstrate compliance with ESG-2015. NAQA operates on the basis of the principles of professionalism and integrity, systematically analyses, reviews and improves its work and documents, taking into account the views of stakeholders, publishes annual reports. NAQA also constantly seeks expertise and advice from international and national experts, in order to continuously improve its activities. Considering that the internal quality assurance policy requires

systematisation and formalisation, the working group developed the Regulation on the quality assurance system of NAQA activities. Also, NAQA task is to prepare for an external audit for compliance with ESG-2015.

9. NAQA proposals for the creation of academic integrity assurance systems and ethics of academic relations in HEIs.

In 2020-2021, NAQA developed the draft law "On Academic Integrity", which was submitted to the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine. Recommendations for HEIs on the development of academic integrity systems have also been developed. This area needs constant improvement in line with changes in the regulatory framework at the national level. The procedure for identifying academic integrity violations and reviewing cases of such violations is an important element of academic integrity assurance system in HEIs and the object of close attention during study programmes accreditation and institutional accreditation. To overcome these challenges, it is necessary to unite the efforts of the authorities and the academic community.

10. Material and personnel support.

Today, NAQA Secretariat consists of 61 employees, which is insufficient to ensure all its powers under the law, in particular: responsibility for study programmes accreditation, specialized examining council for doctoral thesis defence, institutional accreditation and accreditation of independent higher education quality assessment and quality assurance institutions, consideration of academic integrity issues, establishment of internal quality assurance systems in Ukrainian HEIs, university rankings that will be formed according to measured criteria. The Law of Ukraine "On Higher Education" provides for a special procedure for NAQA funding, which has not yet been implemented.

5. Summary Table for external quality assurance actions in higher education in Ukraine for 2022-2023 period.

№	Priority actions	Stages of activity	Responsible executor	Terms of implementation	Expected result
		Development of regulatory and methodological framework			
1	Approval of a set of regulations for the introduction of institutional accreditation	1. Development of amendments to the Law of Ukraine "On Higher Education" 2. Development of bylaws. 3. Approval of the Regulation for institutional accreditation of higher education institutions	The Ministry of Education and Science of Ukraine, NAQA, The Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	by October 2022	Regulation for institutional accreditation of higher education institutions
2	Approval of a set of regulations to build a network of independent higher education quality assessment and quality assurance institutions	1. Development of amendments to the Law of Ukraine "On Higher Education" 2. Development of bylaws. 3. Approval of the Regulations on accreditation of independent higher education quality assessment and quality assurance institutions	The Ministry of Education and Science of Ukraine, NAQA, the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	by October 2022	Regulations on accreditation of independent higher education quality assessment and quality assurance institutions
3	Memorandum between the Ministry of Education and Science of Ukraine and NAQA	Development and discussion of the text of Memorandum, signing, Memorandum implementation	The Ministry of Education and Science of Ukraine, NAQA	August 2022	Establishing cooperation between NAQA and the Ministry of Education and

					Science of Ukraine
4	Update of the Regulations on accreditation of study programmes in higher education and criteria for the quality of study programmes assessment	Development of proposals by NAQA, discussions with stakeholders, submission to the Ministry of Education and Science of Ukraine for approval	NAQA, the Ministry of Education and Science of Ukraine, stakeholders	September 2022	Amendments to the Regulations on accreditation of study programmes in higher education
5	Optimisation of NAQA legal status in the legislation of Ukraine	Development of a draft of changes by NAQA, discussion with stakeholders, initiation of changes in the Parliament, amendments to the Law of Ukraine "On Higher Education"	NAQA, stakeholders, the Ministry of Education and Science of Ukraine, the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	during 2022	Amendments to the Law of Ukraine "On Higher Education" and other laws confirming the status of NAQA as an independent collegial body
6	Revision of the NAQA Statute	Development of proposals by NAQA, discussions with stakeholders, submission to the Ministry of Education and Science of Ukraine for referral to the Cabinet of Ministers of Ukraine for approval	NAQA, the Ministry of Education and Science of Ukraine, stakeholders	August 2022	Bringing the provisions of NAQA Statute in line with the Law of Ukraine "On Higher Education", optimising the structure of NAQA Secretariat
7	Improving the mechanisms of training of NAQA Experts, formation and filling Register of NAQA Experts	Development of changes by NAQA, discussions with stakeholders, amendments to the Regulation for selection and	NAQA, stakeholders, NAQA Experts	during 2022	Optimisation of the mechanism of NAQA Experts' training, the mechanism of response to

		maintenance of the NAQA' Register of Experts for study programmes accreditation			violations by NAQA Experts, optimisation of the mechanisms of administration of the Register of NAQA Experts
8	Involvement of international experts in accreditation procedures	Development of proposals by NAQA, discussions with stakeholders, appeal to the Ministry of Education and Science of Ukraine, in order to initiate relevant bylaws by the Government and amendments to the Law of Ukraine "On Higher Education"	NAQA, stakeholders, Ministry of Education and Science of Ukraine, Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	during 2022	Possibility to involve international experts in the Sectoral Expert Councils, expert groups during accreditation procedures
9	Increasing the level of stakeholders' involvement in NAQA activities	Optimisation of NAQA cooperation with student self-government bodies, discussion with stakeholders, introduction of developed mechanisms	NAQA, student associations and unions	during 2022	More effective involvement of students in NAQA activities
		1. Development of a platform and methodology for a national survey of higher education applicants.	NAQA, student associations and unions, student self-government	December 2022 – February 2023	Finding out the actual role of students in higher education quality

		2. Conducting a survey and compiling an analytical report based on the results.	bodies, Ministry of Digital Transformation (by consent)		assurance system
		Optimisation of NAQA cooperation with employers' associations	NAQA, employers' associations	during 2022	More effective involvement of employers in NAQA activities
10	Development and regulation by law of the procedure and grounds for post-accreditation monitoring. Reform of the Appeal Committee, procedures for appealing against NAQA decisions	Development and discussion of the text of relevant amendments to the legislation of Ukraine	NAQA, the Ministry of Education and Science of Ukraine, the Committee on Education, Science and Innovation of the Verkhovna Rada of Ukraine	October 2022	Approval by the Verkhovna Rada of relevant amendments to the Law of Ukraine "On Higher Education"
11	Methodological and financial support of NAQA on the way to membership in ENQA/EQAR	holding meetings and consultations to identify basic needs and developing measures to provide methodological and financial support	stakeholders	during 2022	NAQA membership in ENQA/EQAR