



NEAQA Serbia

National Entity for Accreditation and
Quality Assurance in Higher Education

Follow-Up Report

NEAQA/ENQA

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Belgrade

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I. Context

National Entity for Accreditation and Quality Assurance in Higher Education (hereinafter: NEAQA) was assessed by ENQA in 2019/20. ENQA Board made the Decision on 20 February 2020, considering the ENQA Agency Review Report, with the conclusion that the overall level of compliance with the ESG was not sufficient to renew the NEAQA membership. The ENQA Board advised NEAQA to carefully follow up and implement the panel's recommendations before re-applying for ENQA membership in the future. Furthermore, NEAQA was advised to avail of the voluntary progress visit that would take place in about two years' time from the ENQA Board's Decision. According to the Guidelines for ENQA Agency Reviews (2016), "a follow-up report (due usually two years after the Board's decision) is obligatory and complemented by a small-scale progress visit to the agency (two members of the original panel, whenever possible)". The follow-up report and the progress visit are constituent parts of the follow-up process of the agency review.















The purpose of the Follow-up Report is to encompass: the overview of various activities taken by the NEAQA during the last two years; ongoing activities focused on harmonization with the EHEA in line with the ENQA panel recommendations; and different issues that have been analysed and discussed, but necessary preconditions for their realization are yet to be ensured. Preparation of the Report has stimulated NEAQA self-evaluation and enabled critical analyses of the work performed from the meta-position. NEAQA expects great benefits from the follow-up process in light of preparation for the next ENQA review.

The ENQA Agency Review Report (February 2020) analysed the compliance of the NEAQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It was based on an ENQA-coordinated external review conducted between April to December 2019 with a site visit to Belgrade, Serbia, between 9 and 11 October 2019. The review panel has found NEAQA to be fully compliant with ESG 3.2 and 3.7; substantially compliant with ESG 3.1, 3.3, 3.5, 2.4, 2.5 and 2.6; and partially compliant with ESG 3.4, 3.6, 2.1, 2.2, 2.3 and 2.7. It has made recommendations under most of the ESG and a number of suggestions for further development. Despite the 'partially compliant' judgments under six ESG standards, the panel concluded that NEAQA was, overall, in substantial compliance with the ESG and also highlighted the importance of a follow-up report.

In the activities on harmonization, development of new materials, procedures and training during the last two years, we collaborated and received a substantial contribution from the project EU support to Reform of Education in Serbia – REdiS 2030.

A comparative overview of NEAQA compliance with the ESG in 2018 and 2020 reviews is given in Table I. Priority in consideration was given to standards which were assessed as partially fulfilled, and those that were less compliant compared to the previous review.

Table 1 Overview of NEAQA compliance with the ESG in 2018 and 2020 reviews

ESG standards	Level of harmonization	Trend
3.1. Activities, policy and processes for quality assurance	2018 Partially compliant 2020 Substantially compliant	
3.2. Official status	Fully compliant	
3.3. Independence	Substantially compliant	
3.4. Thematic analysis	2018 Substantially compliant 2020 Partially compliant	
3.5. Resources	Substantially compliant	
3.6. Internal quality assurance and professional conduct	Partially compliant	
3.7. Cyclical external review of agencies	Fully compliant	
2.1. Consideration of internal quality assurance	2018 Substantially compliant 2020 Partially compliant	
2.2. Designing methodologies fit for purpose	Partially compliant	
2.3. Implementing processes	Partially compliant	
2.4. Peer-review experts	2018 Partially compliant 2020 Substantially compliant	
2.5. Criteria for outcomes	Substantially compliant	
2.6. Reporting	2018 Partially compliant 2020 Substantially compliant	
2.7. Complaints and appeals	Partially compliant	

2. Follow-up of Recommendations of the ENQA Review Panel

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	
<p>Recommendations</p> <p>Even within the present legal constraints, the agency should strive towards involving all stakeholders, and particularly students, as full members in all of its bodies. The agency should use its international connections to also more actively encourage the participation of international experts in its bodies.</p> <p>The governance of the agency should reflect the diversity of stakeholders and of the HE system and avoid being dominated by a small number of institutions, regardless of their prestige and importance.</p> <p>The agency should, in cooperation with the stakeholders, develop a new strategy which would enable the implementation of its mission of enhancing quality of Serbian HE in line with the international standards while keeping a level of control that they find is needed in their system.</p> <p>Panel suggestions for further improvement</p> <p>NEAQA would do well to implement its plan to organise more student workshops, and work harder and more effectively in making its work known and recognized. Student organisations have the potential to significantly aid this work through cooperation with their peers from other parts of Europe as well as their involvement in IQA at their HEIs.</p>	<p>Actions taken:</p> <ul style="list-style-type: none"> ➤ The managing body of NEAQA, "Management Board" (MB) consists of nine members, six of whom are teachers from higher education institutions (HEIs), two employers/professional practitioners representatives and one student representative. All members were elected by the National Assembly of the Republic of Serbia. This is the second composition of MB since the establishment of NEAQA (2018), elected according to the latest amendments to the Law on Higher Education (2021)*, which started its work on 17th February 2022. ➤ The professional body of NEAQA, "Commission for Accreditation and Quality Assurance" (CAQA) consists of nineteen members, seventeen of whom are teachers of HEIs, one student representative and one employers/professional practitioners representative. All members were elected by MB, on the basis of the previously conducted Public Call*. This is also the second composition of CAQA, elected according to the latest amendments to the Law on Higher Education (2021)*, which started its work on 23rd June 2022. * Legal basis: Law on Higher Education "Official Gazette of RS", no. 88/2017, 73/2018, 27/2018 - other laws, 67/2019, 6/2020 - other laws, 11/2021 - authentic interpretation, 67/2021 and 67 /2021 - other laws), hereinafter: LoHE. Amendments to the Law on Higher Education ("Official Gazette of RS", No. 67/21) entered into force on July 10, 2021 (hereinafter: 2021 LoHE Amendments). Representatives of state universities, private universities, academies of applied studies, the labour market and students, are included in the structure of both MB and CAQA. ➤ Regarding the participation of students as crucial NEAQA stakeholders, apart from their membership in MB and CAQA, according to rulebooks enacted by the National Council for Higher Education (NCHE) in 2019, every peer-review panel in all QA processes conducted by NEAQA consists of one student, among three teachers of HEIs and one professional practitioner. ➤ NEAQA has initiated a number of meetings with all stakeholders, representatives of the Government, the Ministry for Education, (hereinafter: Ministry), the National Council for Higher Education (hereinafter: NCHE), representatives of HEIs and the REdiS 2030 project team. Exchange and discussion at these meetings were of great benefit for consideration of the recognized priorities of NEAQA (see other ESGs below). <p>Ongoing activities:</p> <ul style="list-style-type: none"> ➤ Development of the Strategy 2023-2026 and Action plan (list of key issues and recognized priorities; in-depth analysis of the level of harmonization with the EHEA principles and identification of open questions and recourses and conditions needed for improvement). ➤ Since the student representative in the new MB is the President of the Student Conference of Serbian Universities (SCSU), considering that

	<p>one member of CAQA is also a student, NEAQA plans to benefit from this in terms of closer collaboration with students. After another public call for reviewers (see more about NEAQA's public calls under ESG 3.3), that will be conducted within the first quarter of 2023, NEAQA will organize training for reviewers, particularly with students. After the first phase of training, NEAQA plans to organize at least two conferences (with workshops), one for SCSU representatives and one for the representatives of the Student Conference of Serbian Academies of Applied Studies (SCSAAS) on the topics that are of utmost importance for students in Serbia.</p>
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ESG 3.3 INDEPENDENCE**Recommendations**

In addition to involving more experts from outside the system (see ESG 3.1), the independence of the agency from HEIs as well as the government can be strengthened by the following steps, which need to be taken in cooperation with all stakeholders in the system.

(1) To uphold the operational independence of the agency, define the criteria for membership in the bodies of the system which would focus on a balance of their personal experiences and motivation, in addition to the proportional representation of the system and formal criteria defined by LoHE.

(2) To uphold the organisational independence of the agency as well as the independence of formal outcomes, ensure that the Director is in a full-time position with no contractual obligations towards HEIs within the system.

(3) To uphold the organisational independence of the agency as well as the independence of formal outcomes, work with the National Council to define a clearer appeals procedure (see ESG 2.7).

Actions taken:

- The LoHE Amendments 2021 introduced changes related to the procedure for NEAQA selection of reviewers, members of CAQA and members of the Appeals Commission (AC). Previously, NCHE was in charge of these nominations. These changes are an important contribution to NEAQA independence.
- NEAQA has obtained the authority for selection and has announced public calls for reviewers, members of CAQA and members of AC. NEAQA announced three public calls on 18th March 2022 on the official website (www.nat.rs) and in the daily newspaper "Politika". Based on the Public Call, the Management Board of NEAQA approved the **List of Reviewers (LoR)** on 10th June 2022, according to the following criteria:
 1. For teachers of HEIs – academic title, the professional and scientific or artistic contribution of a candidate, his/her experience in accreditation procedure and QA in higher education, participation in projects, international academic experience and other elements stated in the application form (Form No. 1 – published as an integral part of the Public Call);
 2. For students – achieved average grades and efficiency during studies, knowledge of LoHE and the Standards for Accreditation and External QA in HE, as well as other elements stated in the application form (Form no. 2 – published as an integral part of the Public Call);
 3. For employers/professional practitioners – professional expertise and reputation, knowledge of LoHE and the Standards for Accreditation and External QA in Higher Education, as well as other elements stated in the application form for candidates (Form no. 3 – published as an integral part of the Public Call).
- NEAQA's List of reviewers (LoR) currently consists of **1098 reviewers**, including teachers from HEIs, students and employers/professional practitioners. As before, the peer-review panel consists of five members, three of whom are teachers, one employer and one student representative in every QA procedure (accreditation of HEIs, accreditation of study programs, initial accreditation of HEIs and study programs and external QA of HEIs). The composition of every peer-review panel is proposed by CAQA, considering the LoR, and then appointed by the Director of NEAQA. Until now, NEAQA announced two public calls for reviewers (according to the 2021 LoHE Amendments) – on 18th March and on 28th September 2022. MB approved LoR for the first time on 10th June 2022 with 890 selected reviewers. On 12th December 2022 MB made a decision on the selection of additional 208 reviewers.
- MB is now in charge of electing members of **CAQA** (according to LoHE), so it enacted a Decision on the selection of members of the CAQA on 10th June 2022, based on the Public Call, taking into account the appropriate representation of all educational-scientific, i.e. educational-artistic fields, the representation of members of both sexes, as well as the fulfilment of all other legal conditions, with special emphasis on the scientific reputation of the candidates and their experience in the process of accreditation and QA in higher education. CAQA now consists of **19 members**, 17 of whom are

	<p>teachers of HEIs (one is a teacher of the faculty of theology which belongs to the traditional church and religious community), one is a student and one is an employer/professional practitioner. The mandate of CAQA members lasts for 5 years. MB decided to elect 5 members from the previous composition of CAQA that have enrolled in the Public Call (one from each educational and scientific/artistic field) thus ensuring continuity. Since one member of CAQA has recently resigned, due to a conflict of interest (appointed as a rector of the university), NEAQA conducted another Public Call for one member of CAQA in order to fill the vacant position. On 12th December 2022 MB enacted a Decision on the election of one member of the CAQA from among teachers of HEIs (educational and scientific field: Medical Sciences), based on the Public call from 2nd November 2022. CAQA is now again in full composition.</p> <ul style="list-style-type: none"> ➤ MB is also in charge of electing members of the Appeals Commission (AC), according to LoHE, so it enacted a Decision on the selection of members of AC on 10th June 2022, based on the Public Call, taking into account the fulfilment of all legal conditions (recognized scientists and teachers of higher education and scientific institutions from the Republic of Serbia, at least one of whom is from the field of legal sciences), and especially the scientific reputation of the candidates and their experience in the process of accreditation and QA in higher education. NEAQA's AC consists of 5 members, four of them are teachers of HEIs (two of whom are from the field of legal studies – law professors) and one is a recognized scientist (principal research fellow, PhD) from the scientific institute. Since one member of AC has recently resigned, due to a conflict of interest (appointed member of the National Assembly of the Republic of Serbia), NEAQA conducted another Public Call for the member of AC in order to fill the vacant position. MB made a decision on the selection of a new member of the AC on 28th October 2022. AC did not interrupt its work in the meantime (it had a quorum of four members) and is now in full composition. The mandate of AC's members lasts for 5 years. Also, not only had NEAQA formed a body that deals with complaints, but also it defined a clearer appeals procedure (see more under ESG 2.7). ➤ The aforementioned legal solutions ensure the operational independence of NEAQA in general. ➤ LoHE stipulates that the Director of NEAQA is elected and dismissed in accordance with the law, on the basis of a public competition, from among full-time university professors who have experience in management and quality assurance in HE. Also, this position is now full-time, so Director does not have any conflicts of interest, because her position is not related to any HEI (which was commented on in the previous ENQA report). On 10 June 2022 MB decided on appointing the acting director of NEAQA Prof. Ana Sijacki, PhD, former president of the CAQA, which will enable a smooth transition and contribute to NEAQA's improvement endeavour. <p><u>Ongoing activities:</u></p> <ul style="list-style-type: none"> ➤ Public competition, on the basis of which the Director of NEAQA must be selected, is yet to be conducted.
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ESG 3.4 THEMATIC ANALYSIS**Recommendations**

The panel recommends NEAQA not only to start regularly producing thematic analyses, but to use them as a tool for self-reflection (see ESG 3.6) and as a tool to promote good and innovative practices that can be spread throughout system.

Panel suggestions for further improvement

It would also be helpful to reflect what kind of information is needed by the HE system, and which information can be provided on a solid basis by an agency. Once the concept of thematic analyses is developed, a project plan should be put in place on how to put it in practice. For this it is not crucial to establish a specific department, but rather clearly and transparently establish responsibilities for producing thematic analyses within the existing structure.

Actions taken:

- In the period following ENQA Review Report 2020 in line with the recommendations received, NEAQA conducted a thematic review of data gathered from the reports of peer-review panels on the accreditation processes under the new rules, and in different scientific fields (technical–technological; medical and social sciences and humanities):
 - Reviewers' reports on the accreditation of HEIs in accordance with the new rules that have been applied since March 2019 (February 16, 2020);
 - Reviewer's reports on the accreditation of first and second-degree study programs in the field of technical and technological sciences in accordance with the new rules that have been applied since March 2019 (May 29, 2020);
 - Reviewer's reports on the accreditation of first- and second-degree study programs in the field of medical sciences in accordance with the new rules that have been applied since March 2019 (May 29, 2020);
 - Reviewer's reports on the accreditation of first- and second-degree study programs in the field of social sciences and humanities in accordance with the new rules that have been applied since March 2019 (August 20, 2021).
- A more systematic approach to TAs started with the discussion and identification of topics for future TAs. NEAQA has recognized priority topics that refer to:
 - Innovative practices in teaching/learning in HE;
 - Trends analysis of teaching process, assessment and learning outcomes;
 - Graduates' employability;
 - Curriculum development with a focus on curriculum alignment;
 - Benefits and limitations of teaching/learning in a fully online environment, particularly in socially disruptive situations such as the COVID-19 pandemic.
- NEAQA work in the circumstances caused by the spread of the COVID-19 virus on the territory of the Republic of Serbia was addressed in the technical report covering organizational and practical measures employed (May 29, 2020), without a more in-depth analysis of the effects of the pandemic on teaching/learning in HE.
- Above mentioned TAs were published on the NEAQA's website (www.nat.rs).
- NEAQA strengthens its independence principles and procedures through analytical and international project work. The agency actively participated in the CEENQA thematic study on the independence of quality assurance agencies in higher education from different European countries.

Ongoing activities:

- TAs were one of the recognized challenges discussed during the continuing professional development workshop organized for NEAQA staff and CAQA members on 8th November 2022. TAs have been perceived as one of the important mechanisms for a shift from mainly control towards the establishment of NEAQA developmental role in HE in Serbia. Accordingly, insights from collected data on reviewers' engagement (desk analysis and the results of the NEAQA reviewers' survey conducted in October 2021) are currently used for the preparation of relevant TA.
- NEAQA wants to include all stakeholders in the coming period and, based on the discussion with them, create a special procedure for the preparation of thematic analyses (the methodology and procedure for the production and dissemination of thematic analyses, setting out the detailed procedure for systemic analyses, the people responsible, and the framework for the dissemination of their findings, as well as the influence of external stakeholders on the production of thematic analysis).
- NEAQA has always been facing a shortage of staff, but the Director has recently introduced a brand new systematization (see more under ESG 3.5) which is well developed and foresees a special part of the Secretariat that is in charge of all digital processes in accreditation, which mainly includes analytics, statistics, preparation of periodic reports and thematic analyses. Once all vacant positions are filled, that part of the Secretariat will function at full capacity and will deal exclusively with the previously listed tasks. There is one person working as a Coordinator of Digital Processes in Accreditation and one as an Information Systems and Technologies Support Administrator. However, these two colleagues are also in charge of current accreditation and external quality assurance affairs, covering many ongoing cases upon the HEIs' requests for accreditation of HEIs and study programs within two scientific fields, which does not allow them to devote themselves completely to this part of the job.

ESG 3.5 RESOURCES	
<p style="text-align: center;">Recommendations</p> <p>The agency should establish full costs of the procedures, in order to streamline them if possible and thus reduce the overall costs to HEIs, but also to establish long-term financial plans which would enable it to acquire timely additional support from the state budget if necessary.</p> <p>The agency should establish a human resources development plan which would provide not only the criteria and plans for employing new staff, but also training and development activities for both existing and new staff.</p> <p style="text-align: center;">Panel suggestions for further improvement</p> <p>Strengthen the international exchange of staff.</p>	<p style="text-align: center;">Actions taken:</p> <ul style="list-style-type: none"> ➤ Based on the preparation of the three-year financial plan for 2020-2023 and considering challenges to secure financial sustainability, NEAQA directed a request to the Ministry of Education (30th November 2021), to consider the financial issues that are closely connected with the quality of work of the agency and consequently ensuring quality in HE. Some of the important NEAQA activities (such as longer peer-review panels' visits to HEIs, reviewers training, continuing professional development of staff and CAQA members, development of adequate information system, etc.) can be implemented only relying on stable financing as a prerequisite for improved agency work. ➤ A draft initiative to amend Article 14, paragraph 3 of the LoHE in order to enable the co-financing of NEAQA from the state budget is under consideration. This proposal came from the Director who has given relevant arguments on this matter to the MB presenting development plan (for instance, co-financing of NEAQA from the state budget would allow increasing the number of reviewers and their fees, making the visits longer and more meaningful). After the support of the MB, the proposal was sent to the Ministry of Education, which also gave consent. After that, negotiations were conducted with the Ministry of Finance, which sent positive signals to NEAQA regarding this issue. The Agency has made a great effort in this direction and now the adoption of new amendments to the Law on Higher Education is awaited (2023). ➤ NEAQA enacted the new Rule Book on Internal Organization and Systematization of Work Positions on 31st August 2022 and thus introduced three newly formed internal organizational units to perform tasks within the scope and competence of the NEAQA: <ol style="list-style-type: none"> 1. Director's Office – includes the Director (1 post), the Deputy Director (1 post – current stay of employment) and the Business Secretary (1 post); 2. Sector for Accreditation and External Quality Assurance – includes the Head of Accreditation Affairs (1 post), Independent Professional and Technical Associate for Accreditation (5 posts, 2 are currently vacant), Senior Professional and Technical Associate for Accreditation (2 vacant posts), Coordinator of Legal Affairs in the Accreditation Process (1 post), Independent Legal Associate for Accreditation Affairs (1 vacant post), Coordinator of Digital Processes in Accreditation (1 post) and Associate of Digital Processes in Accreditation (1 vacant post); 3. Secretariat – includes Secretary, Head of Secretariat (1 post), Head of Financial and Accounting Affairs (1 post), BA Economics for Financial and Accounting Affairs (1 post), Head of Legal, Personnel and Administrative Affairs (1 post), BA Law for Legal, Personnel and Administrative Affairs (2 posts, 1 vacant), Public Procurement Officer (1 vacant post), Coordinator of International Cooperation Affairs (1 post - current suspension of rights and obligation), International Cooperation Officer (1 post – current stay of employment), Information Systems and Technologies Support Administrator (2 posts, 1 currently vacant), Protection, Safety and Health Officer (1 vacant post), Senior Professional and Technical Associate for Administrative Affairs (1 post) and Driver (1 post). ➤ At the moment, NEAQA has got 17 full-time employees (including Director). Apart from this, there are two colleagues with the status “Stay of Employment” (Deputy Director and Coordinator of International Cooperation Affairs).

- Implementation of NEAQA employees and CAQA members' professional development plan has started with two recently organized steps supported by the EU Project REdiS 2030:

- Professional development workshop held on 8th November 2022;
- Study visit of 21 representatives of NEAQA staff, CAQA, MB and AC members to the Slovenian National QA agency, (SQAA), held on November 23-26th 2022. This visit provided an excellent opportunity for peer learning, exchange of information and experience with colleagues from the Slovenian QA agency, which is an ENQA member. Particular emphasis was given to the discussion of the SQAA internal quality system which is greatly supported by information technology, organizational structure and challenges to secure agency independence and a proactive role in quality culture development in HE.

This approach to organising joint discussions of both NEAQA staff and CAQA members on challenges in quality assurance appears to be a good practice to increase mutual understanding and reach common ground.

- As a full member of CEENQA, NEAQA participates in CEENQA's staff exchange scheme for the year 2022/2023 (in person). This is considered an excellent opportunity for sharing experiences, learning from best practices and discussing various pressing topics of quality assurance with peers across the CEENQA platform. CEENQA has officially approved staff exchange between SQAA (Slovenia) and NEAQA (there is no precise date since it depends on both agencies' schedules, but it is expected to happen in April 2023 and to last for 5 working days). Persons involved in this scheme are Mrs Maja Milas, Head of the Department of Analytics and Information Technology of the SQAA and Mr Janko Balsic, Secretary of NEAQA. NEAQA has already suggested focusing on the following topics during the exchange: production of thematic analysis, reviewers (training, appointment and guidance), analytics and collecting feedback from stakeholders.

Ongoing activities:

- NEAQA is going to perform staff exchange in 2023 on the basis of cooperation agreements with QA agencies from the Balkan region (e.g. with AHERS, Republic of Srpska).
- As a partner of the SEQA-ESG2 project (started on December 2022), NEAQA will be involved in "staff mobilities" (according to ENQA, this will be organized after peer counselling visits and through the progress and discussions of the peer-learning workshops).

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

<p style="text-align: center;">Recommendations</p> <p>NEAQA should introduce formal mechanisms for collecting feedback from experts and institutions after each procedure, collect more qualitative additional feedback, e.g. through focus groups, interviews etc. to reflect on the procedures, especially the pilot procedures and establish similar mechanisms to regularly collect feedback from internal stakeholders – staff and CAQA members. The feedback should be collected and analysed in a manner that enables the stakeholders to comment on what they find relevant, and that can be used by NEAQA to continuously improve its work and the framework in which it operates, and report this to the public.</p> <p style="text-align: center;">Panel suggestions for further improvement</p> <p>The agency can introduce annual workshops with staff (and possibly also separate workshops with CAQA and the Board) to give them the opportunity to reflect on its work and plan future steps.</p>	<p style="text-align: center;"><u>Actions ongoing/planned:</u></p> <ul style="list-style-type: none"> ➤ When it comes to communication with its stakeholders, NEAQA has so far participated only in live meetings (gatherings) with representatives of various associations and (HE)institutions. NEAQA has been cooperating with the Conference of Universities of Serbia (CONUS) and the Conference of Academies for Applied Studies in Serbia (CAASS) regarding the development of accreditation and QA procedures (see ESG 2.1). ➤ Questionnaires were created for reviewers with specific questions regarding the criteria for their selection, the quality of their work (with the emphasis on their training, but also on difficulties and challenges they face), as well as NEAQA’s procedures (see ESG 2.4). <p style="text-align: center;"><u>Ongoing activities:</u></p> <ul style="list-style-type: none"> ➤ NEAQA is currently working on the procedure for collecting feedback not only from reviewers but from all stakeholders (especially HEIs), staff and CAQA. This must be coordinated constantly and for this reason, NEAQA has recently introduced two important roles: “Coordinator of Digital Processes in Accreditation” and “Associate of Digital Processes in Accreditation” that will deal with the formal mechanisms for collecting feedback, implementing the new procedure. NEAQA will train its employees to use adequate tools (Google surveys, Excel, SPSS) for conducting surveys and then to produce TAs. In that sense, NEAQA recognizes the connection between ESG 3.4 and ESG 3.6 and will carefully consider these standards simultaneously and commit to their fulfilment (see ESG 2.2).
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ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Recommendations

NEAQA internal stakeholders need to reflect on the 2017 recommendations and start a broad discussion with all stakeholders on how to implement them and start the reorientation of the whole system towards the development of the quality culture which presupposes institutional responsibility for implementing the first part of the ESG in its entirety, rather than a more lenient system of external control.

Panel suggestions for further improvement

In addition to the recommended changes in the content of the criteria and standards, NEAQA can start experimenting with a less control-oriented approach by making several standards broader, removing the requirement to comment detailed criteria and fill in tables, and leaving just broad questions HEIs can respond to as they see fit and in line with their own internal practices. This is one way in which the agency can move the onus of proof to the HEIs, and enable them to demonstrate improvement as they see fit even without changing the law or fully revamping the standards.

Actions taken:

- NEAQA has made great efforts to establish a closer connection with HEIs, helping them to understand the importance of, first of all, self-evaluation (reminding them that self-evaluation of the institution and its study programs has to be done continuously and not only just before submitting documentation for new accreditation). NEAQA participated in the public hearing of the Draft Law on Higher Education and in a public discussion in the National Assembly in April 2021 where it introduced the need to turn the whole system from quality control to quality assurance in higher education. This, in turn, led to the Serbian legislator's recognition of the NEAQA's aspiration to assure quality in Serbian HE and so, among other changes, the official name of the agency was changed in the amendments to the Law. The official Serbian name of NEAQA has been changed - instead of "Nacionalno telo za akreditaciju i proveru (**control**) kvaliteta u visokom obrazovanju", the agency is now called "Nacionalno telo za akreditaciju i obezbeđenje (**assurance**) kvaliteta u visokom obrazovanju" (official name in English: *National Entity for Accreditation and Quality Assurance in Higher Education*). This was issued in August 2021, based on 2021 Amendments to the LoHE, by the NEAQA's official request to the Commercial Court, where NEAQA has been registered since 2018. Changing the agency's name is considered an important message in terms of a more adequate understanding of its role, not just as a controller, but above all as an institution that emphasises the **quality assurance** of higher education.
- NEAQA believes that all broad discussions regarding accreditation and QA in higher education should start from HEIs of the highest level (universities and academies of applied studies – both legally defined as independent HEIs in Serbia). In that sense, meetings of particular importance were held with the Conference of Universities of Serbia (CONUS) on 6th October 2022 in Belgrade, as well as two important gatherings of representatives of academies of applied studies and colleges (higher schools of applied/vocational studies) organised by the Conference of Academies for Applied Studies in Serbia (CAASS) on 28th September 2022 in Novi Sad and on 2nd December 2022 in Belgrade. Both meetings with CAASS were attended by representatives of NEAQA (Director, Secretary and Head of Accreditation Affairs), presidents of academies, directors of colleges (higher schools of applied/vocational studies), their assistants, secretaries and persons responsible for accreditation in these HEIs. Apart from the introductory lectures on the procedures that NEAQA conducts, as well as the procedure on the self-evaluation/assessment of HEIs (which attendees specifically requested), with the focus on the most common mistakes in the accreditation procedures, NEAQA representatives had the opportunity to answer all stakeholders' specific questions (especially ones concerning obstacles that HEIs face in accreditation procedures). At the meeting in Novi Sad, NEAQA representatives presented accreditation and quality assurance procedures with special attention to internal quality assurance within HEIs and their self-evaluation(assessment), which must be done continually, during the entire accreditation cycle, and not only in the fourth year of the accreditation cycle, as HEIs sometimes interpret (according to the LoHE, the accreditation of the institutions and study programs is

	<p>valid for 7 years, and according to the Rulebook on Standards for Self-evaluation and Quality Assessment of Higher Education Institutions, the self-assessment report has to be submitted to NEAQA twice: the first time in the 4th year of the accreditation cycle, for the previous three years, and the second time as part of the application for new accreditation of the institution or study program. There were also discussions on some interesting topics (for example, hybrid programs and blended learning (conducting lectures online and by high-quality teaching staff, while holding practical classes in institutions)).</p> <ul style="list-style-type: none"> ➤ On the other hand, one of the key products of discussions with CONUS representatives was a proposal for the implementation of hybrid IMT (interdisciplinary, multidisciplinary and transdisciplinary) study programs and the necessary changes of existing standards for the accreditation of study programs. Therefore, based on the collaboration with CONUS, NEAQA recognized the need for the existence of a special standard for accreditation that will refer to the hybrid model of studies. All important stakeholders in higher education took part in this event: representatives of the Ministry, NCHE, NEAQA, CONUS, HEIs, student organizations, Chamber of Commerce, etc. NEAQA has been carefully considering suggestions from all stakeholders in order to clarify its procedures and make them fit for purpose. In a nutshell, all these events were devoted mainly to discussions regarding difficulties faced by HEIs in the accreditation process, as well as the possibilities of adapting standards and legal framework. ➤ NEAQA has found the best possible solution in order to simplify the way of preparing and submitting documentation with the request for accreditation (to help HEIs), as well as to simplify the form of the peer review panel's report. Namely, on the basis of the agreement reached with the Faculty of Technical Sciences of the University of Novi Sad in 2022 (this institution has been hired by NEAQA since 2019 to maintain the NEAQA software called "NAT 2019"), until 1st June 2023 NEAQA will have received improved software and databases that will facilitate administrative work, keeping records of each subject in accreditation procedures, which will ensure that members of review panels, CAQA, AC and staff of NEAQA have more time and other resources to address substantive issues in their day-to-day work. Also, NEAQA is cooperating with the Ministry of Education on integrating all national databases of HEIs employees in order to provide all relevant information (imported from decisions on the election on the teacher's titles, employment contracts with HEI, etc). <p style="text-align: center;">Actions ongoing/planned:</p> <ul style="list-style-type: none"> ➤ Once there is a unified database of HEIs employees containing data relevant to accreditation and external quality assurance procedures, there would be less workload put on HEIs, reviewers and NEAQA staff.
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ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Recommendations	Actions taken:
<p>The agency should consider the ways in which it could adapt its procedures to different types of institutions it evaluates and their varying contexts.</p> <p>In addition to and while implementing the recommendations under ESG 2.1, 3.4 and 3.6 which are all also relevant for this standard, NEAQA would do well to establish, in collecting feedback from the HEIs, which issues are strategic and require long-term institutional action, as opposed to details which can be corrected quickly. This should be emphasised in guidelines to panels and taken into account by CAQA when giving recommendations, to avoid an overly prescriptive approach and enable change and development.</p> <p>Panel suggestions for further improvement</p> <p>The agency could actively monitor the workload it puts on HEIs through external evaluations and follow-up procedures and be prepared to adjust the methodology to ease up the burden if needed.</p>	<p>➤ The Rulebook and instructions for the external quality assurance (EQA) procedure are defined in 2019, but in some elements, they are insufficiently clear, which led to certain problems during their implementation. The LoHE (Art. 22, par. 2) prescribes the following: <i>The procedure of external evaluation of the quality of a higher education institution shall be conducted by the Commission for Accreditation, regularly, in the fourth year of the accreditation cycle, and extraordinarily as well, as well as upon the request of the Ministry and the National Council.</i> CAQA (within NEAQA) began its work in August 2018, so 2022 is the fourth year of the accreditation cycle for all HEIs and study programmes that were accredited in 2018. Unfortunately, NEAQA has not been ready to conduct regular EQA of HEIs in 2022, mainly because of the insufficient number of employees who could be involved in this procedure (NEAQA's priority has been regular accreditation of HEIs and their study programmes, which covers a large number of cases: for example, in 2021 there were accredited 62 HEIs and 557 study programmes and in 2022 (by the mid-November 2022) there were accredited 23 HEIs and 243 study programmes). To this day, NEAQA has only performed "extraordinary" EQA of HEIs, upon the request of the Ministry (3 solved cases: final reports were published on the official website, according to the LoHE, one of whom led to NEAQA issuing a decision on the revocation of the accreditation certificate of one private HEI – ongoing appeal procedure). Upon the decision of the Director, we informed all HEIs in the Republic of Serbia on 15th December 2022 that NEAQA is going to conduct regular EQA of HEIs, in accordance with Article 22 of the Law on Higher Education, upon submitted request and documentation (this information was published on our website; we currently communicate with the representatives of HEIs that need to undergo regular EQA in 2022/2023). At the same time, we are improving our internal regulations, especially CAQA's instructions and guidelines on the procedure of EQA. Amendments to the Rulebook on EQA, including all other rulebooks that must be enacted by the National Council for Higher Education (initial accreditation of HEIs and study programs; accreditation of HEIs; accreditation of study programs; self-evaluation and quality assessment), have not been entered into force yet (rulebooks have not been published yet in the official gazette, so the 2019 rulebooks are still in effect). CAQA and the Secretariat of NEAQA, taking into account the 2021 Amendments to the LoHE, have been working diligently to harmonize the rulebooks with these amendments and, therefore, CAQA adopted proposals for amending all rulebooks at the meeting held on April 7, 2022.</p> <p>➤ So far, NEAQA did not have enough human resources to deal with the collection of feedback from HEIs and other stakeholders regarding accreditation and EQA procedures. As already mentioned, we now have a new systematization and it partly foresees positions related to digital processes in accreditation. We believe that this part of the work could be extremely useful and that it could provide a basis for the preparation of thematic analyses, representing a key element of the self-reflection of an agency for QA in HE (implementation is planned from July 1, 2023, and under the condition that NEAQA will have been approved to be partially financed by the state budget). We put up a plan to form a special team of employees (with the task of</p>

collecting feedback) and to conduct staff training in electronic data processing, sending employees to various seminars and courses in this regard. Training in the advanced functions of "Microsoft Office Excel" already exists and is carried out in our offices continuously, on a weekly basis, and is mandatory for all employees.

Actions ongoing/planned:

- External evaluations truly burden the work of the HEI and should be simplified, while keeping the control component to a sufficient extent. Given that NEAQA has increased the number of employees, we expect that we will soon be able to establish a special department that will deal exclusively with the EQA of HEIs so that this procedure can be carried out properly. There exists a Rulebook on standards and the procedure for EQA of HEIs, which was adopted by the NCHE in 2019, but it is full of shortcomings and practically inapplicable solutions. As mentioned above, we are still waiting for amendments to all our regulations to enter into force.
- NEAQA is aware that not all HEIs should be evaluated in the same way, for instance, academies of applied studies in relation to universities, faculties (both big and small, both state and private), higher schools (colleges) of academic studies as opposed to higher schools of applied/vocational studies, a national university in relation to others, HEIs that have existed for a long time in relation to those that are quite new (for example, older HEIs with long tradition have an elaborate system of QA and self-evaluation and differ greatly from others in terms of type, size, and quality of staff). Therefore, it is necessary to adapt the accreditation and EQA procedures to the specificities of the HEIs, depending on which scientific field they belong to, whether they are academic or applied studies, what is the performance model of the study program, classical or dual, etc. However, this adjustment must not be at the expense of quality, since QA is a key factor in the development of higher education that should be nurtured without deviating from the requirements for its continuous improvement.
- By analyzing the feedback received from HEIs, NEAQA will define weaknesses of the EQA procedure and take measures to overcome them. In that sense, additional staff training is required and it would involve working in the SPSS program and its application to the processes performed by NEAQA, thus providing technical support to NEAQA's Sector for Accreditation and External Quality Assurance for establishing which issues are strategic and require long-term institutional action (not only in EQA procedure).

ESG 2.3 IMPLEMENTING PROCESSES

Recommendations

The agency should try to deepen the level of assessment, in which longer site visits would be of help. This would enable longer meetings which could thus serve as a forum for enhancement-oriented discussions in addition to being a source for evidence checking.

The agency should develop mechanisms of clustering similar programmes in the same institution to assure greater congruence and efficiency of evaluations, rather than organising this ad-hoc and without an impact on the costs of the evaluation.

It should be decided in a broad discussion with stakeholders if audit is meant to serve as a follow-up to accreditation or a separate follow-up procedure is necessary, and if audit itself should have a clear follow-up also in cases when the opinion is not issued.

Panel suggestions for further improvement

The agency could try discussing if the students would support involving the whole panel in the whole of the student meetings during the site visit, and if the feedback is positive, try piloting such procedures.

Actions taken:

- NEAQA extended visiting hours where it found necessary and is aware that the site visits should be a forum for discussion, but cannot arrange visits longer than a couple of hours per day with the current staffing and resources situation.
- NEAQA strongly supports merging accreditations of study programs, as there are requests for the programs to be summarized thematically and territorially, meaning that similar programs should be accredited at the same time and that territoriality is taken into account in order to reduce the costs of the visit (for example, one peer-review panel is appointed for reviewing a couple of similar programs that one HEI conducts, to ensure greater conformity and efficiency of grades). Moreover, NEAQA has recently started arranging virtual site visits (via ZOOM) in the process of accreditation of one or two study programs conducted at the HEIs that have valid accreditation (accreditation lasts seven years and the majority of HEIs are accredited).
- When it comes to the follow-up procedure, NEAQA has recognized changes to the accredited study programs:
 - a. For changes to the accredited study program related to changes in the number of students (increase and decrease in the number of students), studies in a world language, units outside the headquarters, or other additional standards, adding or cancelling modules (except for dual modules) - The institution submits an explanation, updated documentation (according to the table) and the "NAT2019" software report in accordance with the Instructions for the preparation of documentation for changes to the accredited study program, with the proof of payment of the fee. The decision on the aforementioned changes is made by the CAQA based on the submitted request and the explanation of the sub-commission for a specific educational and scientific field.
 - b. Change of seat of the HEI, change of name of study program or diploma (without essential changes of the programme) - documentation must be submitted by the end of the current year. The HEI submits the explanation, updated documentation (according to the table) and the "NAT2019" software report in accordance with the Instructions for the preparation of documentation for changes to the accredited study program, with proof of payment of the fee. The decision on the aforementioned changes is made by the CAQA based on the submitted request and the explanation of the sub-commission for a specific educational and scientific field.
 - c. For other changes (change of board members within commission for quality, new space, number of library units, number of textbooks, number of computers, change of teaching staff; new teachers and associates; promotion to higher positions; references; mentors in doctoral studies, student evaluation - changes points that the student acquires by fulfilling the pre-examination obligations and taking the exam, conditions for enrollment in the study program, changing the content of individual teaching units - does not affect the outcome of the course, adding new courses to the elective groups of courses, changing the categorization of the course, changing the conditionality of listening to the course, changing the performer on the course, changing the literature on the course, changing the distribution of exercise classes - audio, calculus, sub.), the HEI is obliged only to notify NEAQA and submit documentation by the end of the current year. The HEI submits the explanation, updated documentation and the „NAT2019" software report in accordance with the Instructions for the preparation of documentation for changes to the accredited study program.

	<p style="text-align: center;"><u>Actions ongoing/planned:</u></p> <ul style="list-style-type: none">➤ Once we have collected all the data about the changes to the accredited study programmes, we will make a thematic analysis based on it and organize a forum with representatives of HEIs and other stakeholders, where we will review the relevant data and discuss what the follow-up procedure should look like, and whether it is necessary to single it out and consider it as a separate procedure.➤ We plan to extend the duration of site visits and innovate the visit plans in the second half of next year (from September 2023), after we receive financial support from the state budget.
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ESG 2.4 PEER-REVIEW EXPERTS**Recommendations**

The training of reviewers should be more regular and focus on gaining actual competences, preferably through working in much smaller groups. These competences include the skills necessary to successfully lead interviews and organise group work, as well as understanding of key EHEA concepts such as student-centred learning, ECTS and learning outcomes, etc. NEAQA should develop a process which secures that an expert is not asked to assess their previous employers, e.g. by checking short CVs of the experts before inviting them.

Panel suggestions for further improvement

To save time and funds, NEAQA can consider creating online presentations, videos or briefing documents covering the content the experts can study on their own, such as the legal documents including evaluation standards, but also key EHEA concepts. This could help them prepare for the training, and those unable to participate in trainings could use this to prepare for the first meeting in the evaluation.

The agency would do well to more actively implement its plans to internationalise the reviewers' pool.

Actions taken:

- NEAQA announced two public calls for the application of candidates for reviewers (see ESG 3.3).
- In collaboration with the REdiS 2030 project "EU support Reform of Education in Serbia" in October 2021, a survey regarding the selection procedure, training and work of reviewers has been conducted. A total of 422 NEAQA reviewers took part in the survey. Inadequate training and lack of continuous training of reviewers were mentioned as the weakest points in ensuring the quality work of reviewers. The survey results, complementary to ENQA Competencies Framework for QA professionals, are used as a basis for training needs analysis and conceptualization of reviewers' training.
- The online reviewer training program was developed, which includes the following thematic units: 1. European Area of Higher Education - Concept and Importance; 2. Higher Education in the Republic of Serbia and the Role of NEAQA; 3. The Concept of Quality in Higher Education and How to Achieve It; 4. Accreditation and External Quality Assurance in Higher Education. The practical application of the acquired knowledge and skills and their evaluation is planned through the participation of trainees in a simulation-trial review. Online training for the cohort of over 700 reviewers has been launched on 7th December 2022 and will be delivered step by step until the end of February 2023. The ongoing training is hosted by the learning management system (Moodle) of the Institute for Education Quality and Evaluation (ZVKOV), since NEAQA still does not have the necessary technical/ICT resources.
- CAQA has got access to all application documents that NEAQA was receiving during the public calls for reviewers. Applicants (including professional practitioners/employers' representatives) were obliged to submit a specific form with information on their academic and work experience (similar to a CV but adapted to the purpose of public calls). When members of CAQA suggest the composition of a single peer-review panel to the Director of NEAQA, they always take into account not only the List of Reviewers but also every other available piece of information about an individual reviewer. There is also a system of "double-check" in this area since the Director officially appoints peer-review panels based on CAQA's proposals (stipulated by LoHE), so when in doubt, the Director may inform CAQA about any issues that may be arising related to a particular reviewer, especially in terms of conflict of interest. In that sense, CAQA may change the composition of the panel and suggest more adequate reviewers for the job.
- To internationalize the reviewers' pool, NEAQA approached ENQA and CEENQA, which kindly accepted to disseminate referent public calls for the application of candidates for reviewers (international experts). So far, 55 foreign applications have been received. According to our rules, international experts can be involved only in the accreditation procedure of doctoral study

programs. Until now, NEAQA has only been hiring international experts from the countries in the Balkan region, since the engaging of experts from other European and world countries would require additional costs, including the ones related to English translation of the whole documentation, which burdens an already complicated process even more. International experts whom NEAQA hires most often are from Bosnia and Hercegovina (including the Republic of Srpska), Montenegro, North Macedonia and Croatia. In these cases there is no language barrier, thus making the panel organize and communicate easily.

Actions ongoing/planned:

- Online training of NEAQA reviewers is ongoing, including regular communication and timely feedback on their responses and comments received. It is envisioned that newly appointed reviewers will be included in the work of the reviewers' committee (i.e. as job shadowing) in order to improve mutual understanding and support the development of reviewer skills. It is planned that the new NEAQA information system will contain the reviewers' database which should enable continuous monitoring and evaluation of their work. This would also provide input for continuing reviewers' professional development.
- We are aware of the fact that NEAQA needs to recognize international experts outside the Balkans as well, but we can not involve them in our procedures until we have simplified the documentation and reduced the burden on institutions, reviewers and our employees.

ESG 2.5 CRITERIA FOR OUTCOMES

<p style="text-align: center;">Recommendations</p> <p>NEAQA needs to implement the 2017 recommendation to provide benchmarks for its decisions and not base them solely on numerical grades. In addition to improved trainings (see ESG 2.4) NEAQA should also implement one or more of the numerous practices existing to improve consistency in its decision-making – such as critical readers of preliminary reports, committee of experienced reviewers, a scrutiny group of experts who check the reports, systematic comparison of different standards in the same field, a database of decisions and precedents, etc.).</p> <p style="text-align: center;">Panel suggestions for further improvement</p> <p>When CAQA discusses a HEI or a programme a CAQA member is connected with, in addition to abstaining from voting, it would be well that the member leaves the room so that other CAQA members can discuss freely.</p>	<p style="text-align: center;">Actions taken:</p> <ul style="list-style-type: none"> ➤ Several discussions were held at the CAQA meetings regarding the way of reporting the outcomes. The main proposal is to omit the numerical grading and it is adopted. The question remains whether the aforementioned should be applied in the reports of the peer-review panel, based on which the CAQA makes decisions. For the time being, in the explanation of each decision made by the CAQA, a description of each relevant standard is followed by a comment on its fulfilment: the standard is fulfilled/the standard is not fulfilled. ➤ A review of the criteria for outcomes has been a topic of the TAs performed as detailed under ESG 3.4. ➤ Members of the CAQA do not participate in decision-making if they have a conflict of interest (they simply do not vote because of a conflict of interest, which is always stated in the minutes), but they attend the sessions. <p style="text-align: center;">Actions ongoing/planned:</p> <ul style="list-style-type: none"> ➤ NEAQA will form a special Commission (workgroup) that will include 2 reviewers, 2 members of the CAQA and the Head of Accreditation Affairs. The Commission's task will be to analyze the reports of the peer-review panels, assess the fulfilment of standards by the reviewers and the breakage of the prescribed deadlines in the accreditation process and identify all difficulties. The task of the Commission will also be to single out the best-written reports of the reviewers so that NEAQA can post them on the website as an example of good practice that every other panel should consider. The Commission will significantly contribute to the internal control of the implementation of accreditation and EQA procedures. The Commission is expected to start its work in October 2023. ➤ In the spirit of ENQA recommendations, members of CAQA who are in a conflict of interest should not only vote but should not even attend the session. This has to be discussed further with members of CAQA during the ENQA progress visit and (if adopted) recognized by its Rules of Procedure.
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ESG 2.6 REPORTING

<p style="text-align: center;">Recommendations</p> <p><i>It is necessary to uphold the practice of publishing all full reports, and include this in the regulations, at least the NEAQA statute as other regulations can only be changed by other bodies. The responsibility for the dissemination of results should be awarded to both the agency and to the institutions, which should ensure that prospective and current students, employers, and other stakeholders have easy access to the results of accreditation processes. Furthermore, the agency should find creative ways to make those stakeholders aware of its work and its impact, as this is critical to build trust upon the HE system and to show the relevance of its work in that respect.</i></p> <p style="text-align: center;">Panel suggestions for further improvement</p> <p><i>The agency is aware of possible unevenness of the reports as an issue and would do well to collect good practice examples in reporting and disseminate them through its trainings.</i></p>	<p><u>Actions taken:</u></p> <ul style="list-style-type: none"> ➤ Until now, we have published on our official website (www.nat.rs) only the reports resulting from the extraordinary EQA procedure (legal obligation). ➤ Our usual practice is to list the positive outcomes of CAQA's decisions on the website. All accreditation outcomes can be seen in the document "Guide for Students", which we update and publish every week (after every meeting of CAQA). We have improved this document and made it more transparent to all stakeholders (it is immediately visible on the site, as Word/Pdf/Excel document). ➤ We are currently working on simplifying the model of the peer-review panel report. ➤ NEAQA regularly informs the public about all relevant activities. Our website is updated daily and, as already mentioned, the outcomes of the CAQA's decisions are being published on weekly basis, after each meeting/session. All public calls that NEAQA conducted were published on our website (the deadline for applying was counted from the day of publication). In the previous period (especially in 2022), NEAQA underwent significant changes in the organization (a new composition of MB, a new Director, a new composition of CAQA, forming of AC as a new body of NEAQA), and the public was properly informed about it. All MB's decisions on the selection of CAQA and AC members, as well as reviewers, were published after conducting public calls. <p><u>Actions ongoing/planned:</u></p> <ul style="list-style-type: none"> ➤ All final reports of the peer-review panels, decisions of CAQA and the certifications on accreditation enacted by the Director, as well as decisions on the appointment of reviewers will be published on the website of NEAQA in order to ensure complete transparency of NEAQA so that all interested parties (stakeholders) have complete information. In the second half of next year, we aim to start the practice of publishing all reports, as well as decisions and certificates on accreditation. ➤ The model of the peer-review panel report will be structured in the form of a detailed questionnaire with the necessary comments and recommendations (we plan to implement this from March 1 2023). The form will be included in all our legal acts, which will make the process more explicit and transparent. In this way, we believe that we will collect examples of good practice and that the reports will be unified, more transparent and comparative.
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ESG 2.7 COMPLAINTS AND APPEALS

<p>Recommendations</p> <p><i>It is necessary to ensure that an independent body decides on appeals in line with an established procedure of decision-making. Such a procedure should not have changing the decision as an outcome, and the agency and its stakeholders should try to ensure this to the degree in which this is possible without changing the law. Such an independent body should always include not only different stakeholder perspectives but also legal and QA expertise and experience.</i></p> <p><i>The panel recommends NEAQA to develop a complaints procedure adapting the Administrative Law.</i></p>	<p><u>Actions taken:</u></p> <ul style="list-style-type: none"> ➤ Given the 2021 LoHE Amendments, a key objection of the ENQA panel related to the establishment of the independent appeals body has been addressed and prerequisites fulfilled for a fair and independent appeals procedure. ➤ The appeals body of the NEAQA is the Appeals Commission (AC). It decides on appeals against the decisions of the CAQA on the rejection of the request for accreditation of an HEI and a study program. According to the LoHE (Article 21a), AC consists of five members from the ranks of recognized scientists and teachers of HEIs and scientific institutions from the Republic, competent in the areas of quality assurance and accreditation, at least one of whom is from the field of legal sciences. The members of the AC are elected by the MB of the NEAQA, based on a public call. Members of the AC are elected for five years. A member of the AC has the right to remuneration for work in the amount determined by the MB of the NEAQA, with the approval of the Government. A member of the AC cannot be a person elected, or appointed to a position in a state body, body of an autonomous province or local self-government, in a body of a political party or the position of a management body of an HEI, a person who is a member of the NCHE, a person who is employed in the NEAQA, as well as the person who was elected as a member of the CAQA. A person who has been elected as a member of the AC, and who is on the List of reviewers, cannot perform reviewer duties during the term of office of a member of the AC. MB of NEAQA dismisses a member of the Appeals Commission: 1) at personal request; 2) if he/she performs his/her duties negligently or damages the reputation of the performed duties; 3) if he/she is elected or appointed to a position in a state body, body of an autonomous province or local self-government, in a body of a political party or the position of a management body of an HEI if he/she is a member of NCHE if he/she is employed in NEAQA if he/she was elected as a member of CAQA; 4) due to violation of the code of ethics. AC elects its chairman from its members. AC adopts the rules of procedure. ➤ Members of AC were selected based on a previously conducted Public Call (see ESG 3.3). When registering for the Public Call, each candidate had to submit a certificate that he/she had not violated the code of professional ethics of the higher education or scientific institution where he/she was employed. AC adopted the Rules of Procedure on July 14, 2022 (published on the NEAQA website). ➤ AC has already made its first decisions (three decisions on rejecting HEIs' appeals on CAQA's decisions on rejecting requests for the accreditation of study programs, and three decisions on the rejection of untimely submitted requests for accreditation of one HEI and two study programs). ➤ AC adopted its Rules of procedure on 14th July 2022 (published on NEAQA's website).
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	<p>➤ The appeals procedure is now clarified and given in more detail in the Law on Higher Education. Article 23a of the LoHE stipulates the following (in order):</p> <ul style="list-style-type: none"> • HEI can file an appeal against the decision of the Commission for Accreditation and Quality Assurance (CAQA) on the rejection of the request for accreditation, within 15 days of receiving the decision, to the Appeals Commission (AC of NEAQA), through the CAQA. • CAQA determines whether the appeal is filed timely, whether it is permitted and submitted by an authorized person and whether there are reasons to comply with the appeal request and issue a new decision annulling the contested decision. CAQA can supplement the procedure if it finds it necessary. If CAQA does not reject the appeal, nor does it comply with the appeal request, it forwards the appeal to the AC within 15 days of receiving the appeal. • Within 30 days from the date of receipt of the appeal AC appoints an appeals sub-commission that consists of three reviewers from the appropriate field from the NEAQA List of reviewers. • The appeals sub-commission submits a report with the proposal for a decision on the appeal to the AC within 30 days from the date of appointment. • Within 30 days from the date of submission of the proposal AC issues a decision by which it may reject the appeal or annul the first-instance decision and return it to CAQA for re-decision. CAQA is obliged to issue a decision in accordance with the legal position of the AC within 30 days from the date of receipt of the AC's decision to cancel the first-instance decision and return it for reconsideration. If an HEI files an appeal against the decision of CAQA, AC itself, within 30 days of receiving the appeal, will issue a decision on the request for accreditation in accordance with its legal position. The decision rejecting the appeal, i.e. the decision by which AC decides on the request for accreditation in accordance with its legal position, is final in the administrative procedure. • The law governing the general administrative procedure shall be applied to the issues of handling the appeal that is not specifically regulated by this law. • A HEI whose request for accreditation was rejected has the right to repeat the request for accreditation after 90 days from the date of adoption of the decision.
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Follow-Up preparation working group:

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NEAQA Serbia

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