The Quality of Higher Education:
National Endeavours in the European Context

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"Through its Re-granting Scheme, the Eastern Partnership Civil Society Forum (EaP CSF) supports projects of EaP CSF members with a regional dimension that will contribute to achieving the mission and objectives of the Eastern Partnership Civil Society Forum.

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Key areas of support are democracy and human rights, economic integration, environment and energy, contacts between people, social and labour policies."

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Regulatory framework and practice in providing the quality assurance in Belarusian higher education

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Legislative regulation of the higher education system is based on the country's Constitution, Education Code and Belarusian President's decrees. Based on them, the Ministry of Education adopts Resolutions, prepares Orders and communicates this to educational establishments by mail. Most of these documents have regulatory and administrative nature. Some of the regulatory documents such as Concepts and Development Programs are approved by the Council of Ministers of the Republic of Belarus.

The new Education Code of the Republic of Belarus was adopted in 2011 and was supposed to regulate and settle relations in education at the system level. However, the Parliamentary debates on Education Code on December 4, 2013 showed the need to revise it substantially. The debates were held due to the wide dissatisfaction of the academic community with Education Code conservatisms. As the result, the Parliament adopted the Decision on revising practically all Code articles and then adopting its new edition. Currently, Education Code amendments are under the consideration of state administrative bodies and it is believed that the National Assembly will receive it by the end of this year.

In accordance with the Code, the quality of education is "meeting the educational standards requirements and the study program documentation for corresponding educational program" (Art.1). Attestation including current, intermediate and final, is named as an instrument of quality control (art.93). However, "quality assurance" is prerogative of the state (Art.124). The educational establishments are engaged in self-control (Art.125), which is considered as the internal quality control.

Internal quality control in higher education institutions in Belarus is mainly an administrative process and is conducted by the management vertical representatives in accordance with their functions as well as by Commissions established by the Rectors. Wherein, as a rule, they monitor only the quality of supported documents that regulate a set of activities in subordinate departments/divisions. Administrative review is conducted in relations to study, research, ideology and educative work.

Teaching quality assessment is conducted through the classes' visits by the fellow faculty members and institution's management representatives. More thorough faculty review is conducted once in 5 years when the faculty in question is due to apply for his/her contract renewal within an open competition procedure in accordance with existing laws. This process requires faculty member to conduct open classes, report on the latest developments at the Departmental and Faculty Council meetings as well as faculty conducts students' opinion poll anonymously. Based on these, the faculty is elected or not by the secret ballot.

Quality of students' learning outcomes are assessed through credits, tests and exams as well as course works and diploma thesis.

At the national level the Quality Assurance Department of the Ministry of Education

(Department) is the only quality controlling body. The Department determines licensing and attestation schedules (external quality assurance). It also determines assessment program and methodology as well as prepares the final assessment conclusion, which is then forwarded to the Ministry of Education Board lead by the Minister of Education and approved by them. The certificate is issued by the Department for the term of 5 years and is based on the Board decision.

The assessment procedure is cumbersome and overloaded with indexes, which practically, are included into the institution's annual report, i.e. also fall into non- accreditation category. The assessment is conducted based on the available documents and not based on the real measurements thus there is a possibility to simplify the accreditation process.

Starting from 2009, Belarus began implementing the quality management system in accordance with ICQ 9000. This allowed to certified universities to lose Department's control in relation to institutional management effectiveness, main and supporting processes control by the institution's management because the Department simplified the accreditation assessment for certified institutions.

The higher education stakeholders participate limitedly and play insignificant role in higher education quality assurance process. Student' participation in Faculty and University Councils is very formal and their representatives are not involved into the process of determining the programs content. The university graduates (alumna) are very rarely asked for their contributions if at all. However, some of institutions' standards outline such participation as quality monitoring component. Students' parents are also not a part of any quality assurance process in higher education institutions as well as employers are limitedly involved in educational process and final students' attestation stage (state exams on specialization and diploma thesis defense).

We can consider the regulatory requirement to harmonize specialization standards with largest employers as a positive development in this field. However, this harmonization is ineffective simply because the largest employers do not have education specialists on staff and the available information doesn't provide the full and deep understanding of their participating in this process. We also would like to note that the issue of developing and implementing the National Qualification Framework (NQF) remains unresolved. The Ministry of Labor has been working on this for the last couple of years. In this respect, the Council of Ministers issued the Resolution #34 from January 17, 2014 "On some issues of the National Qualification Framework development in the Republic of Belarus", which allows only pilot project for developing and implementing new NQF and only in 2 economic areas: IT and Public Administration, to be delivered during 2014. Currently, this work is still in process and moves forward very slowly.

Thus, Belarus has its external and internal quality assurance system for higher education, which consists of set of administrative procedures implemented by administratively appointed bodies and commissions. Herewith, the quality of education itself (learning outcomes) is not assessed by anyone except faculty. International experience in this process, which is based on academic freedom and institutional autonomy, is very seldom looked at and used. Stakeholders and employers opinion is taken into consideration to a small extent. The existing system doesn't comply with ESG requirements and only partially apply ENQA criteria. All these makes national system is ineffective and frozen.

The main Bologna instruments such as European standards of Diploma Supplement (DS) and European Credit Transfer System (ECTS) are practically unused in Belarus. However, credits as ECTS analogue appeared in higher education standards and institutions' curricula (The Belarusian Ministry of Education order #405 from May 27, 2013) but are not used

by them. The higher education institutions also do not recognize learning outcomes of other institutions. Based on this, we can easily conclude that ECTS in Belarus is seen as instrument of converting existing study load in hours into credits but not as main program design characteristic. DS is also developed and issued by the graduates' request but its legal status is not defined. Therefore, except from academic record is used as diploma supplement within the country.

The quality of education is significantly affected by the academic freedom suppression. The facts of restrictions and violations of fundamental freedoms such as freedom of association, freedom to vote and to be elected and freedom of movement are normal features of educational system. In addition to this, the right to participate in institution's management is limited, the unlawful disciplinary measures apply, forced labor is used. For example, the students are under constant pressure from institution's administration that increases when important public events nears. Prohibition for students' participation in protest actions is secured in internal institution's code of conduct or Ethics code. There are facts of faculty illegal persecution for their public views and exercising rights to freely express their opinions. In 2013, the authors of "politically harmful" publications were fired from Brest and Grodno State Universities.

Faculty don't have rights to really participate in university's management. Rectors, appointed by state, are not liable to academic community. University or Faculty Councils approved by Rector and Dean, respectively, do not make any decision on key university or faculty matters. On the other hand, the representatives' nominations is based on approved standards and done in democratic way. It is needless to add that the dean's position became elective 5 years ago.

The institutional autonomy level is low. In accordance with Belarusian Independent Bologna Committee research results (assessment was conducted by 30 indicators used by EUA), the level of organizational autonomy is 24 points out 100, financial is 26,5, personnel is 25 and academic is only 10. The dominant role of State leaves very little space for initiatives and creativity without which the development is impossible.

The Republic of Belarus was the last country to be admitted to EHEA at the Summit of the European Ministers of Education in Yerevan in 2015 and the first to join Bologna conditionally. The long-term isolation policy and refusal to accept European higher education values de facto has led to significant gap in both legislation and educational practices, which changed since the Soviet time a lot elsewhere. In this situation, Belarus was offered and accepted the Roadmap for higher education reforms (RM) that provides 3 years timeline for the country's higher education modernization in terms of legislations and educational practices. In terms of quality assurance, Summit participants pointed to discrepancies between Bologna and Belarus State authorities principles. In order to harmonize this with European practices, the Roadmap outlined the following results to be achieved through its implementation process:

1. To ensure by the end of 2017 the development of legal framework for establishing Independent quality assurance agency in accordance with European Standards and Guidelines (ESG).

2. To prepare the agency establishment t timeline by the end of 2015.

3. To invite, through BFUG, international experts in quality assurance for assisting in development of timeline and plans as well as in establishing the agency itself.

In this case, we are not talking about reassigning existing agency role (Department for quality assurance, which is a division of the Belarusian Ministry of Education) that is responsible for quality assurance in higher education and conducting licensing and accreditation in higher

education but about the radical change in approach to quality assurance based on ESG.

At present, the Department for quality assurance is operated in accordance with and regulated by:

- Regulations on the State accreditation procedure for educational institutions and other organizations, which, in accordance with the law have the right to provide educational services, and confirmation of the state accreditation (approved by the Council of Ministers, #820 from June 22, 2011).

- Resolution of the Ministry of Education of the Republic of Belarus #75 from December 29, 2009 „On some issues of the quality of education control".

- Resolution of the Ministry of Education of the Republic of Belarus #144 from November 30, 2010 „On the procedure of assessing applicant capabilities for meeting licensing requirements and conditions set for the licensed activity as well as for works and (or) services forming corresponding licensed activity referred to by the applicant of the special permit (license) in the request for issuing special permit (license) (implemented by licensee (entered into force on January 1, 2011).

- Resolution of the Ministry of Education of the Republic of Belarus #76 from July 12, 2012 (ed. from January 16, 2016) „On defining some documents for for educational activities licensing and annulment Resolution of the Ministry of Education of the Republic of Belarus #109 from November 5, 2010".

- Regulation on the Ministry of Education of the Republic of Belarus, approved by the Council of Ministers of the Republic of Belarus from August 4, 2011 #1049. (3.6 exercise the control of the quality of education. 4.11 is responsible for educational activities licensing in accordance with the law on licensing; 4.12 carries out state accreditation of educational institutions, other organizations, which, in accordance with the law, have the right to carry out educational activities, confirmation of state accreditation. 7.9 approves regulations on the Ministry of Education structure and its divisions (except for the Department of quality assurance as a legal entity).

These documents are only marginally meet ESG recommendations. In particular, Belarus adopted declarative principle for licensing and accreditation procedures, which constitutes a voluntary approach in this process. However, functioning of higher education institution without license is illegal, which leads us to the fact that mandatory accreditation is the only way to be able to provide students with diploma confirming their higher education degree while Belarus doesn't possess any mechanism on informal education results recognition. Therefore, voluntary is rather provisional and in practice, turns into institution's obligation to file necessary application to the Department in time while for educational services consumers the only source to obtain recognized degree in Belarus is to seek education in accredited institutions.

The licensing process is formal where the Department reviews and evaluates institution's compliance with existing regulations in terms of financial and personnel resources. On the other hand, accreditation is an expert assessment. The Department establishes Commission consisting of specialists from other higher education institutions. This setting is somewhat replica of peer review but the Committee is lead by the Department's representatives, which lows the democratic angle of this process.

The Committee reports its findings to and prepares conclusion for the Ministry of Education Board that decides on accreditation.

Regarding the point 1 of the Roadmap, we can note that the National Institute for Higher Education is being working of revising Education Code, which corresponds to the House of Representatives positions voted in favor of Code revisions at the Parliamentary debates in 2013. However, the first version of new edition of the Code didn't envisage the establishment of an independent quality assurance agency. The following Code editions are not available for public thus we can't assess the compliance with the Roadmap provisions.

Concerning point 2 and 3 of the "Quality assurance" provisions in the Roadmap, we may state that the work is in process at the level of consultations with BFUG representatives. However, the representatives of civil society and academic community have not been invited for the meetings with international experts. The timeline for activities to establish independent agency may exist but also is not available for public, which make it difficult to assess whether this was fulfilled. Moreover, in according with the Department Director's statement made in October 2016, department itself is considered rather independent and its activities do not fall short from ESG requirements although they need updating.

The State Program for education development for 2016-2020 also doesn't envisage the establishment of independent quality assurance agency.

Below, we present a short analysis of above documents compliance with ESG and their application. We used the document (ESG) translation into Russian language by Kazakhstan Independent Quality Assurance Agency (2015) as Belarus didn't translate this document into official state languages. Indicators selected for analysis are listed in the second part of the consolidated standards list while some indicators are taken from other its parts but related to external quality control.

Nr. acc. ESG	Indicator	Need to amend the legislation	Need to revise practical application	Compliance with the Road-map require-ments
1.10	**Cyclical external quality assurance** Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.	No	No	Yes
2.1	**Consideration of internal quality assurance** External quality assurance should address the effectiveness of the internal quality assurance described in Part 1 of the ESG.	Yes (is not taken into account presently)	Yes (current practice is non-existing)	No
2.2	**Designing methodologies fit for purpose** External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.	Yes (the interested party are not involved, their interests are not taken into account)	Yes	No

Nr. acc. ESG	Indicator	Need to amend the legislation	Need to revise practical application	Compliance with the Roadmap requirements
2.3	**Implementing processes** External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include: - a self-assessment or equivalent; - an external assessment normally including a site visit; - a report resulting from the external assessment; - a consistent follow-up.	Yes (in terms of self-assessment)	Yes (in terms of reviewing the data from self-assessment report)	No
2.4	**Peer-review experts** External quality assurance should be carried out by groups of external experts that include (a) student member(s).	Yes (in terms of student involve-ment)	Yes (in terms of student involve-ment)	No
2.5	**Criteria for outcomes** Any outcomes or judgments made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.	No	No	Yes
2.6	**Reporting** Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.	Yes	Yes	No
2.7	**Complaints and appeals** Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.	No	No	Yes

Nr. acc. ESG	Indicator	Need to amend the legislation	Need to revise practical appli-cation	Compliance with the Road-map require-ments
3.1	**Activities, policy and processes for quality assurance** Agencies should undertake exter-nal quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objec-tives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should en-sure the involvement of stakehold-ers in their governance and work.	Yes	Yes	No
3.2	**Official status** Agencies should have an estab-lished legal basis and should be formally recognised as quality assur-ance agencies by competent public authorities.	Yes	Yes	No
3.3	**Independence** Agencies should be independent and act autonomously. They should have full responsibility for their op-erations and the outcomes of those operations without third party influence.	Yes	Yes	No
3.4	**Thematic analysis** Agencies should regularly publish reports that describe and analyse the general findings of their exter-nal quality assurance activities.	Yes	Yes	No
3.5	**Resources** Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.	Yes	Yes	No
3.6	**Internal quality assurance and professional conduct** Agencies should have in place pro-cesses for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.	Yes	Yes	No

Nr. acc. ESG	Indicator	Need to amend the legislation	Need to revise practical appli- cation	Compliance with the Road- map require- ments
3.7	**Cyclical external review of agencies** Agencies should undergo an exter- nal review at least once every five years in order to demonstrate their compliance with the ESG.	Yes	Yes	No

This analysis shows that the current Belarusian legislation is in a need of substantial revision that possibly may affect not only the Education Code. The Ministry of Education Letter of Instruction #08-17/2077 from September 15, 2015 "On the educational process organization in higher education institutions in 2015/2016 academic year" and the Ministry of Education Order #628 from July 30, 2015 "On measures for implementing the European Higher Education Area instruments into the national education system for the period of 2015-2018" led us to believe that some changes were on the way but these documents do not contain deep analysis of Bologna instruments while they themselves were not distributed among academic community members. This doesn't provide any ground for successful implementation of EHEA principles and instruments.

In this regards, in order to accelerate the Roadmap implementation, we propose to initiate the process for Education Code amendment, in particular, to revise the following Code articles: 20, 23, 29, 105, 109, 118 and the entire chapter 13 on the quality of higher education. The new provisions are prepared and we are ready to present them for discussion with the Eastern Partnership experts interested in the process of the higher education reforms in Belarus and the Roadmap implementation.

Within the framework of this project and for the further planning of joint actions of Eastern Partnership countries on increasing the quality of higher education, we propose to introduce the following indicators:

1. **National level**
    1.1. To ensure legal guarantee for universities autonomy and academic freedom.
    1.2. To ensure establishment of at least one Independent Accreditation Agency operating in accordance with ESG requirements.
    1.3. To ensure legally the choice of Accreditation Agency including foreign.
    1.4. To ensure voluntary accreditation process.
    1.5. To ensure absence of any limitation for academic mobility including interna- tional.
    1.6. To introduce National Qualification Framework.
    1.7. To introduce Professional standards.
    1.8. To transition to three-tire education model.
2. **Institutional level**
    2.1. To ensure Rector's electiveness.
    2.2. To ensure establishment of self-governing decision making body independent from Rector.

2.3. To ensure information transparency on university management system.

2.4. To ensure informational transparency on curricula and program content.

2.5. To eliminate students, faculty and staff discrimination.

2.6. To implement ECTS as a main instrument for educational process planning and education results recognition including other universities.

2.7. To provide all graduates with European format of Diploma Supplement free of charge.

2.8. To evaluate learning outcomes based on competences provided by the professional standards.

2.9. To implement student oriented principles into educational process.

The Republic of Moldova: a sinious way towards an European quality of higher education

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Analysis of the Regulatory-Legal Framework for Quality Assurance in Higher Education

In general, the regulatory-legal framework for quality assurance in higher education has passed through a controversial evolution. Here are the main stages in its developments:

Year 1995 – Adoption of the Law on Education[1], in force until December 2014, according to which the quality of higher education represents a set of characteristics of an educational programme and of its suppliers through which are met the expectations of the beneficiaries in relation with the accreditation standards or with the national reference standards. Quality management in higher education is secured at the national level by the Ministry of Education and the National Agency for Quality Assurance in Vocational Education, and at the institutional level – by the internal structures in charge of quality assurance (Articles 37, 371-374). The respective articles were subject to a number of amendments, the competences in terms of external evaluation being awarded either to the Ministry of Education, or to an agency whose name used to be changed, depending on the political conjuncture.

Year 1997 – Adoption of the Law on the evaluation and accreditation of educational institutions in the Republic of Moldova[2], in force until November 2014. According to this law, the evaluation and accreditation of educational institutions at all levels and of any form of ownership were a competence of the Ministry of Education and were fulfilled by the Department for evaluation and accreditation of educational institutions, which was a subdivision of the Ministry of Education. Obviously, such as approach implied for the ministry both a policy development task in the field of education quality assurance, and the task of implementation and monitoring of such policies, what contravened the principle of separation of public policy development competences from the implementation competences. The law also established the evaluation criteria, the general requirements towards the managerial and the teaching staff, the curricula and the syllabi, the technical-material resources, the evaluation and accreditation criteria.

Year 1999 – Adoption of the Law on the approval of the Regulations for the evaluation and accreditation of educational institutions[3], in force until November 2014. The Law contained an indicative list of indicators for self-assessment of educational institutions, grouped into six categories: teaching staff, content of the educational process, students and pupils, research, technical-material resources and economic-financial activities. To be noted that the law did not provide for any minimal standards, mandatory for the educational

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[1] Official Journal no. 62-63 of 09.11.1995, Article 692.
[2] Official Journal no. 69-70 of 23.10.1997, Article 583.
[3] Official Journal no. 80-82 of 29.07.1999, Article 382.

institutions.

Year 2014 – Adoption of the Code of Education[4], in force since November 2014. According to the Code, the quality of education is defined as a set of characteristics of an educational programme and of its suppliers, through which are met the expectations of the beneficiaries from the perspective of quality standards (Article 3). The higher education institutions are subject to an external quality evaluation once in five years, based on the methodology and on the criteria established by the National Agency for Quality Assurance in Vocational Education and approved by the Government (Article 83). The external evaluation of the educational process in higher education shall be performed by the National Agency for Quality Assurance in Vocational Education. The internal evaluation of the educational process in higher education shall be done by the institutional structures in charge of quality assurance, based on institutional regulations (Article 99). Articles 112-114 of the Code contain general provisions about both the internal and the external quality assurance and evaluation, and Article 115 lists the tasks, the responsibilities and the rights of the National Agency for Quality Assurance in Vocational Education. The Code explicitly specifies the aspects to be subject to evaluation: institutional capability; educational efficiency, including the academic performance; quality of the initial and continuing vocational training programmes; institutional quality management; the results of research and/or artistic activities; the consistency of the internal evaluation with the real situation (Article 113, paragraph (5)).

It is worth being mentioned that, for the first time in the history of education in the Republic of Moldova, the external evaluation of higher education quality may be performed not only by the national authority with competences in this field – the National Agency for Quality Assurance in Vocational Education –, but also by any other quality evaluation agency listed in the European Quality Assurance Register for Higher Education (Article 113, paragraph (4)). The respective provision of the Education Code might generate legal collisions in relation with the "educational institutions" that are under the jurisdiction of the separatist authorities of the region currently uncontrolled by the constitutional authorities of the Republic of Moldova.

In the opinion of this survey's authors, a significant omission of the Education Code in the field of quality assurance in higher education is the fact that the business sector, the communities, the professional organisations and civil society organisations are under-represented to the administration of both the National Agency for Quality Assurance in Vocational Education, and of higher education institutions.

According to Article 115 of the Education Code, paragraph (8), the Administration Board of the National Agency for Quality Assurance in Vocational Education shall consist of 15 members, including 13 members who are holders of teaching-research and research positions and only one student representative and one representative of the business environment. Although the Code of Education provides for the establishment of speciality boards, boards by specialisations and a corps of experts-evaluators, it does not set explicit requirements towards their educational and professional backgrounds, the availability of a substantial experience of work in the real economy's sectors. Certainly, under such conditions, although it is declared as being "external", such a quality evaluation is in fact external only in relation with the educational institution subject to evaluation, but it remains an internal evaluation in essence, being conducted by employees of the higher education system.

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[4] Official Journal no. 319-324 of 24.10.2014, Article 634.

The situation is similar in relation with the Councils for institutional strategic development that, according to the Code of Education, are administration bodies of higher education institutions (Article 102) and, obviously, have a direct influence on quality assurance activities. Unfortunately, the Code of Education (Article 104) only specifies the institutions empowered to appoint the members of the Councils, without establishing explicit requirements in terms of occupational fields, sectors, institutions, companies, organisations whose employees should be and/or represent the Council's members. As a result, as the chart below shows, most of the councils consist of the employees of higher education institutions themselves or of State authorities that have a direct involvement in the administration of the respective institutions, and less of the real economy.

Chart 1. The composition of the Councils for institutional strategic development

State institutions

1%
11%
9%
8%
24%
47%

- Representatives of professional associations
- Representatives of private sector
- Representatives of public sector
- Employees of educatioonal institutions
- Representatives of State authorities
- People from abroad

Private institutions

0%
13%
14%
6%
22%
45%

- Representatives of professional associations
- Representatives of private sector
- Representatives of public sector
- Employees of the educational institutions
- Representatives of State authorities
- People from abroad

Source: Authors' calculation based on the data of the Ministry of Education.
http://edu.gov.md/ro/content/management-universitar

The data presented in the table above reveal that over 70% of members of the councils for institutional strategic development in public institutions, and 67% - in private higher education institutions are education employees or representatives of State authorities. Not more than a share of about 20% in public institutions and 27% - in private higher education institutions are representatives of professional associations or of the public sector. The share of professionals from other countries is insignificant, being estimated at nearly 1%, but these members can hardly be considered as experts trained abroad, as they are native of the Republic of Moldova.

Year 2015 – Approval of the Decree of Government of the Republic of Moldova on the organisation and functioning of the National Agency for Quality Assurance in Vocational Education[5]. The Regulations for the organisation and functioning of the Agency and its structure is a component of this Decree. In the opinion of this survey's authors, an important step towards the integration of the Moldovan higher education into the European area was marked by the clause that provides for the selection of the members of the Agency's Administration Board by a committee consisting of 5 representatives delegated by at least 3 quality assurance agencies from the European countries that are registered in the European Quality Assurance Register for Higher Education (EQAR). Unfortunately, similarly to the Code of Education, the respective Regulations do not set explicit quotas for the representatives of the business environment, professional associations and communities who will be the expert-evaluators.

Year 2016 – Approval of the Decree of Government of the Republic of Moldova on the approval of the Methodology for external quality evaluation for authorising the temporary functioning and accreditation of the educational programmes of technical-vocational, higher and continuing education institutions and of the Regulations for the calculation of fees for services provided in the framework of the external evaluation of educational programmes and of technical-vocational, higher and continuing education institutions[6]. The methodology and the Regulations describe in detail the procedures for the external quality evaluation, explicitly establishing the accreditation standards, the performance criteria and indicators.

The accreditation standards, the performance criteria and indicators concern both the educational institutions, and the educational programmes. Compared to the previous experience of the Moldovan higher education, this measure represents a principled innovation of quality assurance and evaluation approaches.

In the opinion of this survey's authors, the evaluation and accreditation of not only educational institutions, but also of the educational programmes will encourage the universities to diversify their educational offer and to enhance the quality of the educational services provided by them, setting the prerequisites for the demonopolisation of the market of such services.

But, regrettably, the accreditation standards, the performance criteria and indicators are general, often declarative, and do not include qualitative, measurable indexes. As a result, in the opinion of this survey's author, there is a persisting risk that evaluations are pronouncedly subjective, as they were before the entry into force of the new Code of Education. In the lack of qualitative, measurable indexes and minimal quality standards, the political arguments might harm both the evaluation procedures, and the guidelines followed by the educational institutions towards quality assurance.

[5] Official Journal no. 98-101 of 24.04.2015, Article 217.
[6] Official Journal no. 134-139 of 20.05.2016, Article 671.

Opinions of the Teaching and Managerial Staff about Quality Assurance in Higher Education

Immediately after the Republic of Moldova joined the Bologna Process (in 2005), all higher education institutions of the country initiated the implementation of a wide complex of quality assurance measures. Those measures were targeted at both institutional changes, and at changes in terms of rules and procedures. Here are the main measures:

- a quality assurance department, subordinated usually to the first deputy rector, was set up in each higher education institution;

- a quality assurance board was established within each faculty;

- a person in charge of quality assurance issues was appointed within each university chair;

- the senates of higher education institutions developed and approved quality assurance concepts and, afterwards, procedures that include both the quality auditing and evaluation, as well as, most important, concrete activities focussed on their improvement.

As a result of implementing the above-mentioned measures, quality management systems were implemented in practically all universities of the Republic of Moldova, the leadership role of university managers in the development, implementation and continuous improvement of the quality management systems was strengthened, the degree of participation of the stakeholders (students, representatives of the business sector, communities) in the development and implementation of quality assurance policies enhanced.

In the process of developing the present work, the authors performed a qualitative sociological survey during which in-depth interviews were conducted with decision-makers of the Ministry of Education, of the National Agency for Quality Assurance in Vocational Education, of the Chamber of Trade and Industry of the Republic of Moldova, with managerial and teaching staff of higher education institutions.

According to the respondents, the following major achievements were obtained in the Republic of Moldova in terms of quality assurance in higher education:

- A regulatory-legal framework for quality assurance, fully compliant with the European practices, was set up.

- The Moldovan practice for quality assurance in higher education is getting in line with the European practice.

- The partnerships with the European structures for quality assurance are expanding, the Republic of Moldova benefiting both from methodological, and financial support for strengthening the quality assurance systems.

- Most universities are aware of the fact that the development of professional competences is a priority, and the "employability" of graduates shall be one of the major performance indicators of any higher education institution[7].

At the same time, the respondents have also pointed out a number of constraints and

[7] The neologism "employability" was used by the respondents with the meaning of "the possibility of being employed in accordance with the obtained qualification".

drawbacks faced by universities in their endeavours towards a genuine quality assurance in higher education:

- Unjustified intervention of the political factors both in the establishment of the minimal performance standards, and in the conduct of quality evaluation procedures.
- Regrettable delay of the launch of external evaluation processes and accreditation of higher education institutions.
- Superficial approaches to quality assurance, the activities performed in this field looking sometimes as a declarative and/or populist campaign.
- Weak links with labour market, the representatives of business communities do not have efficient tools to influence on the situation.
- A part of the managerial and teaching staff do not have quality assurance and management skills.

The most representative opinions formulated by the respondents during the in-depth interviews are specified in the textbox below.

Textbox 3. Opinions about Quality Assurance in Higher Education

- After joining the Bologna Process, quality assurance became a priority both at the national, and at the institutional level. The institution in charge of the external evaluation is autonomous in relation with the governance, due to what the objectiveness and the relevance of quality evaluation will be secured. The collaboration with the European quality assurance agencies was extended. At the same time, there are still elements of formalism and populism in quality assurance (*Holder of a managerial position within the Agency*)

- In certain universities, there was a delay in setting up the quality assurance departments. Other universities even do not have such a department so far, and are not aware of the quality assurance policies. In order to make the system functional, there is need for a professional approach that might change the overall vision about the methodology and the process of quality assurance in education. (*Holder of a managerial position within the Agency*)

- We have passed from knowledge evaluation to competence evaluation, but a large share of the teaching staff can hardly see the difference between the evaluation of the knowledge and the evaluation of competence. Certain teachers have not been trained well enough in this field and, probably, there are no resources for such training in our country. (*Head of a quality assurance department, University X*)

- We have a close cooperation with the European organisations, we have projects, three curricula have an international accreditation: the history, chemistry and finance and banking curricula. An accounting programme was accredited by a London Quality Agency in the field of accounting services. Nine subjects taught by them are worldwide recognised. The Law specialisation was awarded an accreditation by ARACIS and ECA. A large number of European projects help us with the continuing training of the teaching and managerial staff. (*Head of quality assurance department, University X*)

- In general, the activities of the Quality Council are focussed on the analysis of the curriculum content and of the evaluation tests. The person in charge of quality assurance in the framework of the faculty cooperates with the chair members and with the teachers towards identifying the problems and solving them. Nevertheless, in my opinion, the faculty's Quality Council is still rather passive. (*Teacher, University X*)

- The Code of Education is good, compliant with the international requirements, but we would like to change certain provisions. We propose that the Chamber of Trade and Industry be a part of dual training, we would like to have the right to do it. We need to separate the evaluation and the accreditation from the educational process. An institution that provides education shall not do the final evaluation. A third impartial institution in charge of evaluation and certification of the professional competence should exist. We represent the private companies and we should be the ones to evaluate if it is ok or not. The evaluation board should not be established by the university, it shall be from outside, similarly to the bachelors' degree examination, where one cannot cheat and the evaluation is objective. The accreditation system must be external, not from the Republic of Moldova, because here people know each other. (*Holder of a managerial position within the Chamber of Trade and Industry*)

- We had and we still have a very intense cooperation with the European organisations for quality assurance. We are members of ICAM that helps us very much. We take part in all meetings related to quality assurance at the European level. We implemented dedicated projects with TEMPUS and ERASMUS programmes, within which we worked much towards quality assurance and setting up and strengthening the agency. We had a very thorough collaboration with three ENQA agencies - ARACIS, ACQUIN from Germany and EKKA from Estonia. All the required tools have been set up as a result of such collaborations. The Ministry of Education has worked closely with all these structures and will enjoy their further support. (*Holder of a managerial position within the Ministry of Education*)

Source: Qualitative sociological survey conducted by the European Institute for Political Studies of Moldova, 2016

To be noted that practically all the respondents pointed out the threat of bureaucratisation of quality assurance procedures, and many of them mentioned the explosive increase of the number of documents (forms, reports, minutes, etc.) to be filled in by the teaching and the managerial staff.

### Opinions of the Students about the Quality of Higher Education

No doubts, the measures undertaken by the authorities and the educational institutions in terms of quality assurance in higher education should have a reflexion into the perceptions of the citizens, primarily of students. The nationwide representative opinion polls conducted among students and parents revealed that their perceptions are confused. On

the one hand, nearly 60% of students are content with the contents, the organisation and the conditions of the educational process, and, on the other hand, nearly 47% of students and 61% of parents consider that diplomas awarded at present are deprived of any value.

While requested to assess, using a scale from 1 (discontent) to 5 (very content), their degree of contentment, most students rated with a score of 4 and 5 all the aspects of the educational process: teaching-learning, material resources, facilities and services. The teaching-learning process was assessed by students based on number of criteria, the most important of them being the quality of knowledge acquired at the faculty, the practical competences acquired in the respective field of education, the quality of teaching, the teachers' qualification, the available educational resources, the relevance of the criteria and the objectiveness of the evaluation procedures, etc. Similarly, the material resources were also assessed from the perspective of the level of endowment of laboratories and libraries, the provision of educational institutions with the required equipment for the conduct of educational processes, etc. The evaluation of the facilities and services was done based on the reputation of the faculty and of the institution, the assistance provided to students in terms of career guidance, the level of activism of student organisations, the degree of student representativeness and involvement, the support provided by the faculty in terms of access to international mobility, etc.

Chart 4. The degree of student contentment with the contents, the organisation and the conditions of the educational process
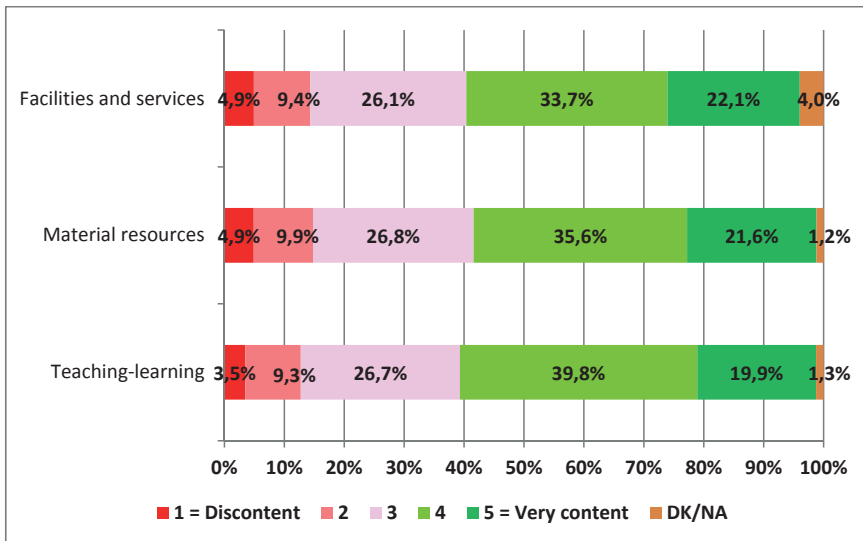
Source: Authors' calculation based on the data of the sociological survey „Students' perceptions of the educational system. IMAS, 2016"

The data in the chart above show that a considerable share of students are not so content with the contents, the organisation and the conditions of the educational process, the share of respondents who gave a low score, 1 and 2, being estimated at 15%. A matter of concern is the fact that nearly 27% of students rated the quality of educational processes

with only 3 points, a score that may be interpreted as «Neither content, no discontent».

Another important indicator characterising the quality of higher education concerns its relevance. Unfortunately, according to this poll's data, a very large share of students consider that the faculty does not prepare them for life, nearly 38%.

Chart 5. Distribution of students' responses to the question „To what extent does a faculty prepare the students for life, in your opinion?"
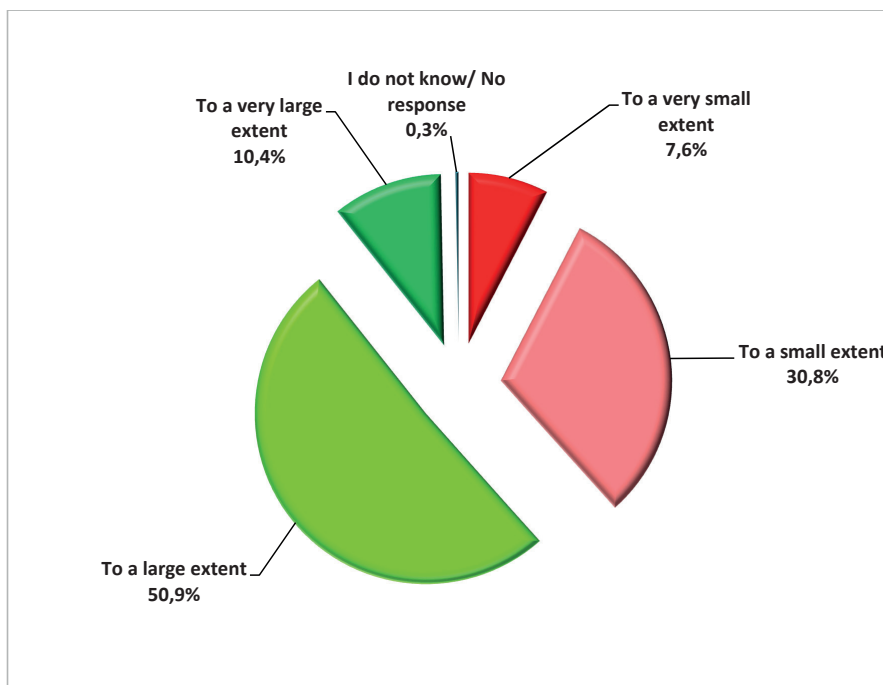
Source: Students' perceptions of the educational system. IMAS, 2016

The fact that a significant share of students consider that there is such a wide gap between the faculty and the real life calls into question the efficacy and the efficiency of the measures intended to enhance the quality of higher education. Such a discrepancy confirms a new time the importance of increasing the degree of participation of the direct beneficiaries of education – students, communities, business sector - to the governance of higher education, in general, and of each university, in particular.

The lack of close links between the content and the goals of university education is also pointed out by the fact that a significant share of students (nearly 47%) and parents of gymnasium and lycee pupils (nearly 61%) consider that the diplomas do not have any value at present.

**Chart 6. Opinions of students and parents
about the value of the diplomas**

Do you agree or not with the statement: "Today's diplomas do not have any value"?

	Agree	Disagree	DK/NA
Students	46,5%	48,8%	4,6%
Parents of gymnasium and lycee pupils	61,2%	31,5%	7,3%

0% 20% 40% 60% 80% 100%
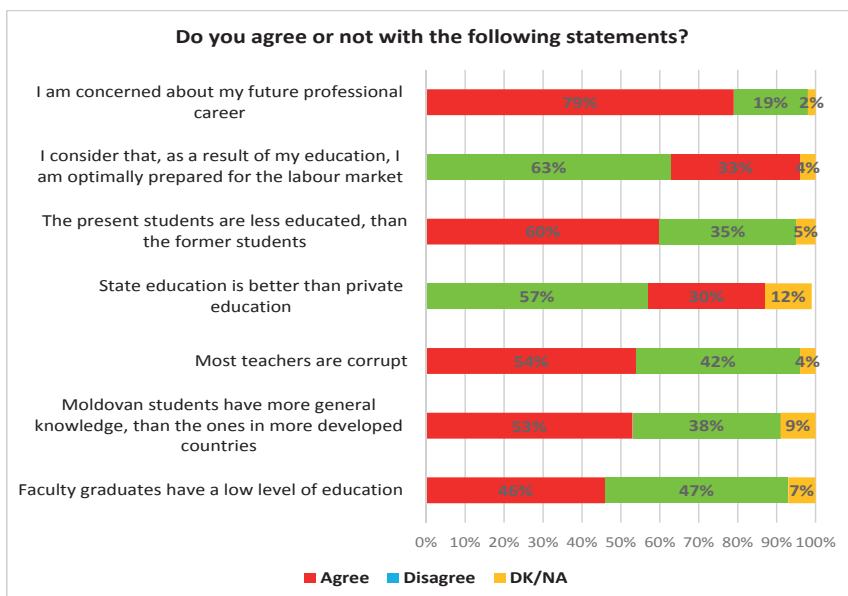
■ Agree ■ Disagree ■ DK/NA
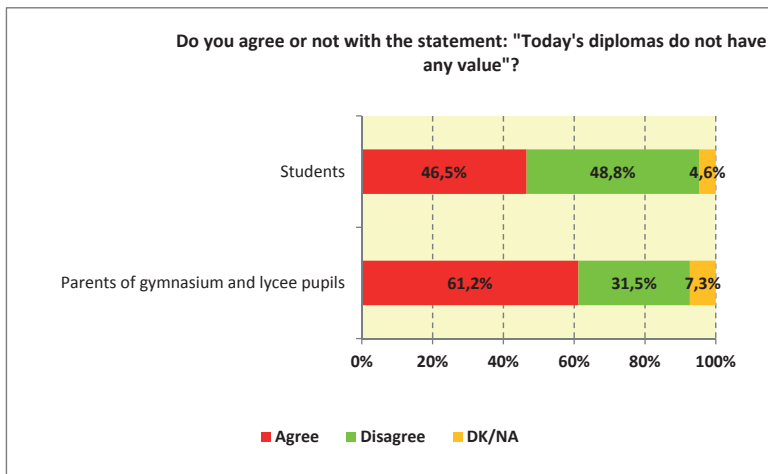
Source: „Perceptions of the educational system" and „Students' perceptions of the educational system „. IMAS, 2016

Unfortunately, a significant share of students and parents do not consider anymore the education as an important factor for a successful life, relying more on kinship relations, on the ability to benefit from the authority and the social position of the parents, on money. A very small share of students, about 17% of the total number of respondents, stated that education and the appropriate preparedness are primordial factors for a successful life in the Republic of Moldova.

In general, the students' opinions about the quality of education are divided, but most of them are concerned about their future professional career. A significant share of students, nearly 46% of the total number of respondents, consider that the graduates of faculties have a poor level of education, and nearly 60% – that the present students are less educated than the former students. It is worrying that about 54% of students consider that most university teachers are corrupt. Obviously, such perceptions are not in favour of the statements that, as a result of implementing a set of measures for improvement of higher education quality, its quality has enhanced.

No doubts, the students' opinions should be interpreted with maximal prudence, because some of them are contradictory. Thus, although many students consider that the diplomas today are deprived of any value (about 47% of the total number of respondents), and 79% of them are concerned about their future professional career, a significant share of students (about 63%) consider that university education prepares them optimally for the labour market.

Chart 7. Opinions of students about the quality of education

Do you agree or not with the following statements?

Statement	Agree	Disagree	DK/NA
I am concerned about my future professional career	79%	19%	2%
I consider that, as a result of my education, I am optimally prepared for the labour market	63%	33%	4%
The present students are less educated, than the former students	60%	35%	5%
State education is better than private education	57%	30%	12%
Most teachers are corrupt	54%	42%	4%
Moldovan students have more general knowledge, than the ones in more developed countries	53%	38%	9%
Faculty graduates have a low level of education	46%	47%	7%

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

■ Agree ■ Disagree ■ DK/NA

Source: Students' perceptions of the educational system. IMAS, 2016

Conclusions and Recommendations

Finding 1. The developments of higher education in the Republic of Moldova were characterised by significant variations in the number of students, namely, it more than doubled throughout the period 1996-2007 and, afterwards, it passed through a spectacular decrease during the period 2007-2016. But, despite such variations, the number and the composition of the teaching staff and the technical-material resources of universities did not benefit any major improvements. The moral and physical obsoleteness of the technical-material resources, the pronounced commercialisation of higher education, the endeavours of universities to improve their financial situation exclusively by the means of the enrolment of a larger number of applicants based on a tuition fee contract did not bring any considerable improvement of the quality of education.

Finding 2. Significant changes in terms of setting the prerequisites for the improvement of university education quality were made after the Republic of Moldova joined the Bologna Process in 2005 and extended its collaboration with the European countries in this field. The processes of setting up the required regulatory-legal and institutional frameworks for quality assurance started namely after joining the Bologna Process, alongside with the launch of a range of international projects focussed on the development of quality assurance methodologies, providing training in the field of quality management to the teaching and managerial staff.

Finding 3. The analysis of the budgetary allocations for higher education shows that they were mostly directed to the payment of salaries and of costs of utilities, less to the modernisation of the infrastructure and of the teaching-material resources. The few improvements achieved by higher education institutions are mainly related to the physical conditions (current renovations, some capital repairs, construction of new educational buildings), less to the provision of the laboratories with modern equipment, setting up new laboratories, opening experimental subdivisions and sectors for education and production.

Recommendations. Setting explicit rules to be followed by the educational institutions in terms of financing the measures intended to enhance the quality of university education: allocations for the modernisation of laboratories, continuing training for the teaching staff, endowment of the traditional and virtual libraries, student mobility, and teacher mobility. The quota of such allocations in the budgets of educational institutions should not be lower than 20%, with an annual increase by at least 5%. Supplementing the regulatory-legal framework in force for the evaluation and accreditation of educational institutions and programmes by explicit criteria concerning the assessment of the level of budgetary coverage of education quality improvement measures.

Finding 4. The regulatory-legal framework for quality assurance in higher education has passed through controversial developments, but its situation has stabilised and now it is to a large extent compliant with the European recommendations. At the same time, the role of the professional associations, of representatives of the business environment, of the communities, of civil society organisations in the governance of higher education in general and of educational institutions in particular is underestimated. Regrettably, the evaluation and accreditation of higher education institutions and of educational programmes will be conducted by a corps of evaluators consisting mostly of representatives of other educational institutions from the country. Moreover, the regulatory-legal framework does not explicitly set a quota for the participation of evaluators from the European countries. Or, in the context of the endeavours towards the integration into the European higher education area, their quota should be significant.

Recommendations. Update the regulatory-legal framework by the means of: (a) setting a quota of up to 40% for the participation of business environment representatives to the strategic development councils; (b) setting a quota of at least 30% for the participation of representatives of the professional associations and of the business environment to the evaluation boards; (c) involving foreign experts as evaluators, as a result of setting a quota of at least 60% for the participation of European experts for all evaluation boards.

Finding 5. Many intended quality assurance and management measures do not have a solid budgetary support, particularly the ones focussed on the involvement of experts and evaluators from the business environment or from abroad. A large number of regulatory-legal documents related to the implementation of such measures do not have any explicit provisions concerning their financing, and are not supplemented by amendments to the budgetary rules. The implementation of quality assurance and management measures was not accompanied by the update of the documents related to the workload of the teaching and managerial staff.

Recommendations. Update the procedures for developing and executing the budgets of higher education institutions. Update the rules for the remuneration of the staff involved in quality management, of the experts-evaluators, particularly of the ones from the business environment and from other countries.

Finding 6. According to the subjective perception of the teaching staff and of the decision-

makers, the Republic of Moldova, with the support of the European partners, achieved a significant success in terms of institutionalisation of the system for quality assurance and management, both at the national, and at the institutional level. At the same time, certain constraints and drawbacks still persist in this field, such as the unjustified intervention of the political factors, regrettable delay of the launch of the processes for external evaluation and accreditation of higher education institutions, a share of the managerial and of the teaching staff have not been trained on quality assurance and management.

Recommendations. Urgently start the process of evaluation and accreditation of educational institutions and of the curricula. Expand the continuing training opportunities for the teaching and the managerial staff in the field of quality assurance and management. Establishing master's degree and doctor's degree education in the field of quality assurance and management in higher education.

Finding 7. The subjective perceptions of the students of the quality of university education are not in favour of the statements that the quality of higher education has enhanced as a result of quality assurance measures. Although students' opinions are sometimes contradictory, a large share of them consider that today's diplomas do not have any value, that the present students are less educated than the former students, and that most teachers are corrupt.

Recommendations. Enhance the degree of student participation in governance of higher education, and of universities. Set up consultative student bodies, representative at the national level, under the Ministry of Education and the Board of Rectors of Moldova.

Ukrainian National Quality Assurance Agency for Higher Education: the starting point

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Introduction

National Quality Assurance Agency for Higher Education had to start its activities in fall 2015 right after its members were elected. However, Prime-minister, Minister of Education and Head of Parliament committee on education altogether refused to accept the results of the election because some members were previously distracted by lustration process. Therefore Agency was politically blocked and haven't been active until summer 2016 when it gained two new elected members instead of lustrated ones.

After Agency started to operate CEDOS decided to conduct in-depth interviews with its members. First of all, we want to describe the collective portrait of members' of Agency views on its most important functions. Thus we hope to draw public attention to the visions and plans of Agency for the near future.

Agency is the new public governance body which duties are described in 17-23 articles of Law on Higher Education. It is formed by 25 representatives from universities, National Academy of Science and branch academies, the association of employers and congress of representatives of students' self-governance bodies. Employers delegate 3 members, and students elect 2 members. Representatives of universities are elected by conferences among representatives of public, municipal and private universities. Students are elected by the congress of representatives of students' governments of higher education institutions. Three members are elected by a joint representative body of all-Ukrainian associations of employers. The rest is nominated by National Academy of Science and branch academies.

Members of Agency shall stay in office for the period of three years. The same person may not serve in Agency for more than two terms. Chairs and deputy chairs of the National Academy of Sciences and branch academies of sciences, rectors or founders of private higher education institutions may not be members of Agency.

Public budget allocations for Agency are established annually by the parliament within the state budget for each year. In general, Agency is non-for-profit organization and could be funded from the following sources:

- the public budget;
- payments for work on accreditation and licensure reviews and funds received as payment for other services related to higher education quality assurance in the amounts defined by Agency;
- grants on QA in higher education;
- other sources not prohibited by law.

According to the Law Agency got power to:

- define requirements for the higher education quality assurance system, design regulation on accreditation of programs of study with its subsequent submission for approval to the Ministry of Education and Science;

- carry out accreditation of programs offered by higher education institutions;

- analyze the quality of education activity carried out by higher education institutions;

- carry out licensure reviews and prepare expertise on granting a license for education activity;

- offer amendments to the list of fields;

- build a database of programs introduced by higher education institutions;

- define criteria for evaluation of education quality in higher education institutions (including quality of research);

- identify requirements for PhD level and develop a procedure for PhD-degree award with its subsequent submission for approval to the Ministry of Education and Science;

- design regulation on accreditation of bodies which award PhD-degree and carry out such accreditation;

- carry out accreditation to independent agencies for assessment and quality assurance of higher education.

Methodology

During September and October of 2016, there were 17 in-depth interviews conducted with members of Agency. Altogether there are 25 members of Agency. The majority of interviews was conducted face-to-face, two by e-mails and one by phone. Some of the members were not interviewed. Mostly they refused to give any comments until Agency has been operating for a while. Sometimes they claimed lack of time.

Respondents were guaranteed anonymity, so the report does not contain any names or any other information that could identify them. That is also why the paper refers to the respondents as males, as there are only 4 women members in Agency.

Our goal was to describe Agency members' opinions on its primary functions, find out the similarities and differences. The research focused in particular on the legislation and composition of Agency, accreditation, indicators that describe the quality of higher education and scientific performance, scientific degrees granting and the role of students, faculty members and other agents in internal quality assurance procedures.

The further paper is written upon the results of the interview with the members of Agency and is the summary of respondents' thoughts on these matters.

Legal Framework and possible amendments

Not all of the interviewed members of Agency were ready to answer questions concerning the Law on Higher Education and possible changes to it. Some respondents mentioned that it would be more appropriate to give comments on this matter after Agency is active for

some time as most of the issues, misunderstandings and adjustments will appear during work. One of the respondents noted:

> *There will never be an ideal law. We have to understand that we will never make it perfect and all-encompassing.*

Those respondents who did answer the question were concerned with the need to specify the authority of Agency. One of the respondents said:

> *It is said that Agency has to implement the government policy in higher education, but it's not clear whether Agency is the state institution or not.*

Also, there is a need to detail the launching procedure of Agency.

One of Agency members believes that its Statute have to be changed, but it should be done after the institution has worked for some time. As for now, it is a good *"starting model"*.

Another respondent pointed out that despite the proclaimed independence of Agency, in fact, it is not independent. That is the case because government officials can get involved in the work of the institution by pressuring public universities through members of Agency who represent these universities. Furthermore to the respondent's mind the Ministry of Education and Science has to say a lot in matters that are supposed to be regulated by Agency. Some other members of Agency share this thought. Also the need to specify and separate in authorities of Agency and Ministry was mentioned during the interviews. There was also an idea that Agency has to have a separate line in State budget instead of being sublined within Ministry's budget. Another one of the respondents expressed his concern about the by-laws which are supposed to be written by Agency. In his opinion, these by-laws could bring back the Higher Attestation Committee[8] or create some kind of its counterpart.

A few respondents mentioned the wide range of powers that Agency has, and this seems improper to them. In most of the European countries, QA Agencies have only one function, which is the accreditation of university programs. One of the respondents mentioned that he does not see the point of the different terms for different members of Agency[9]. Also, the idea of dividing responsibilities of Agency between some institutions, or even laying them on the universities, was expressed. As the wide range of Agency powers enables both the Ministry and the universities to put some of their functions and responsibilities on Agency. A significant amount of Agency authority is not active. This allows Ministry and universities avoid performing certain functions explaining that they are Agency responsibility.

Almost all respondents agreed to give their opinions on Agency composition procedure. Each one of them mentioned the need for some changes: most of the suggestions referred to Agency personnel, in particular, the need to expand the quota for representatives of employers, private universities or colleges and training schools, as well as cutting the number of the representatives of public universities.

One of the respondents believes it is a good idea because it is a lot easier to find some pressure points for the public universities, which defeats the idea of Agency independence.

Furthermore, some mentioned the need to include the representatives of NGO organizations and leading foreign professionals to Agency team as the guest experts.

Besides the possible quota changes, some of the respondents mentioned changes that

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[8] State body which concentrated much power in scientific degrees granting inherited from Soviet times.

[9] Here we must say that Law prescribes equal terms for all members of Agency.

are needed in the selection process itself. One of Agency members pointed out that some of the people who *"indeed are experts in higher education"* didn't make it to be elected to this institution. Some of the responses touched upon the need to establish additional qualification requirements for the candidates, for example, no plagiarism in any papers. Furthermore, some respondents think that the procedure itself could be more transparent. One of the ways to improve it is to provide direct elections with secret ballot procedure for those candidates who pass the bar of the qualifications.

One of the respondents believes that additional qualification requirements are necessary, but does not see the point of changing the election procedure. According to his words, one of the candidates during the election is believed to be the Ministry representative (officially working there), who could have had a significant influence on the representatives of the public universities. Nevertheless, he was not elected, and this may prove that voters (as employees of public universities who are under the authority of the Ministry) elected Agency members based on their personal preferences and not the employment-related ones.

Also, members of Agency are not comfortable with the fact that their activity becomes legitimate only by the act of the government as it questions Agency independence.

Accreditation procedure: current problems and needed changes

Most of the respondents pointed out how outdated the accreditation procedure is now. Many of them see the biggest problem in the vast amount of formalized requirements which are based on the quantitative indicators. For example, some of such indicators are the area of libraries and computer rooms. Some respondents mentioned that current procedure does not correspond to the European one. One of the interviewees mentioned the need to address to European accreditation associations for recommendations on the appropriate accreditation indicators.

One of the respondents mentioned that methodology used in Ukraine is recognized worldwide and the only thing that needs to be changed is criteria. Another member believes that Agency should turn to international experience but adapt it to the Ukrainian reality at the same time.

Another one said that while there is no new accreditation of study programs, it was difficult to tell what issues might occur with the procedure.

Some of the respondents offered new criteria most of which included the alumni employment and salary rates. Agency members suggested giving more weight to the university's self-evaluation and paying attention to the amount of funds universities get from sponsors and international grants (as such sources give preference to the universities with the high quality of education). There was also thought about the need to establish new criteria based on the conditions created for students: taking into account the syllabuses, social and domestic conditions and the overall conveniences for the students in each university.

The respondents mentioned about need to take into account the opinion of stakeholders, as well as results of rankings in each field of study. One of the respondents believes there should only be accreditation organizations that represent a specific field of studies. For example, the law programs should have an accreditation done by the representatives of the Ukrainian Bar Association.

One of the respondents mentioned that changes need to start with licensing and not with the accreditation. Besides that, he believes that these two concepts need to be separated. First of all, licensing has to become more democratic and *"all-encompassing".* Another respondent offers more radical democratization and stands for cancellation of licensing. He believes that market of educational services should be more open so that everyone who wants to provide such services can do it at any moment. In this case, the demand from applicants and accreditation from Agency as well as from independent institutions will be an indicator of program quality. This way accreditation will not serve as the permission or prohibition to provide the educational services. Instead it will become a "quality label" - some indicator which applicants may consider when choosing a university or a program.

A few times members of Agency mentioned the need to assimilate international practices in accreditation: the procedure itself, experts participation and their trainings.

One of the respondents, referring to international practices, talked about two possible approaches to the accreditation procedure in Ukraine. The first one focuses on students' results. It means that students are assessed in some way, and the decision on whether to give accreditation to the university or to the program is based on those results. Another approach takes into account the whole system of quality assurance of the program. If the system works, it means that *"the program educates good students"*.

There was also a three-step process of accreditation proposed by one of the respondents. The first step includes self-evaluation of program, mission and goals of the university. Defining its mission and vision university evaluates its own program based on questionnaires compiled taking into account the standard. Thus the university can see the problems that should be solved before the second stage. As a result, the first phase provides diagnosis, self-awareness and a test of being honest to himself. During the second phase, external experts evaluate the quality of education at the program. Before assessment they must undergo appropriate training to avoid misinterpretations of their questionnaire based on which they carry out the assessment. The third phase is the decision about the accreditation of program that is made upon corresponding the results of the self-evaluation and the assessment that is given by the experts. If the those two do not collide the accreditation is granted.

Some respondents mentioned that employers should be the members of the accreditation committees. Furthermore, it is important that each committee has experts in the field of studies related to the program which is getting accreditation.

Some respondents think that students should not take part in the accreditation because they can not be considered experts, not to mention that they would have to miss their studying. However, there were some who thought that students' participation was necessary: their opinions have to be taken into account, and a pool of such student-experts has to be created, as right now there are not a lot of those who could professionally take part in accreditation procedures.

All respondents shared a thought about developing the list of criteria for candidates to accreditation committees. The list may contain such criteria as the knowledge of English, an academic degree, previous experience of working in some particular field, etc. One respondent believes that graduates of international exchange programs (who bear an alternative experiences) can become agents of change.

All interviewed members of Agency pointed out the importance of providing both training and further skill improvement for the accreditation experts. None of the respondents could shape out the principles, but most of them believe it is best to turn to the international

practices. Also, the respondents think that the coaches for Ukrainian experts should be foreign professionals.

Avoiding the conflict of interest is an important part of the selection of accreditation experts. Most believe that each expert of each accreditation committee should be chosen very carefully to avoid such conflict. So there should be information about the expert's previous professional experience, possible connections with each university. One of the respondents stated that there should be an administrative or criminal responsibility for those who conduct the accreditations in case they violate the rules. There are also those who believe that this is the matter of expert's integrity and in a case of any potential conflict of interest they should notify the management of Agency about it. Some think that accreditation should be performed by the independent agencies so there could be no arrangements between rectors about mutual accreditations. One more way to avoid conflict of interest is standardized accreditation conclusions in which experts should be guided by a detailed and formalized questionnaire. Furthermore, one of the respondents believes that fair high salary should motivate experts to work more efficiently and should reduce the risks of bribery, corrupt practices and favoritism.

Some of the members offered implementing the automatic random selection among a pool of accreditation experts in every field. So when the accreditation committee has to assemble, a computer chooses random experts in particular area to be the members of each committee. One of the respondents mentioned that besides such automatic selection it would be a good idea to have some independent testing and rating of such experts done on a regular basis.

Also, some claim that Agency should become a member of the European Association for quality assurance in higher education, which will give possibility to invite foreign professionals to be the experts in these accreditation committees as one of the most efficient ways to avoid conflict of interest.

Scientific degrees

Among the possible changes in the system of granting scientific degrees mentioned by respondents there are a few the most popular ones. Some of them referred to the need to call off additional payments for scientific degrees, as for some of people it is the only motivation to have a Ph.D. thesis. One of the respondents suggested covering such payments through grant funds or tender processes as an alternative to the state funding. Another one offered canceling the state guaranties for additional payments and settle this matter with the contracts between the university and each professor. Many changes that were mentioned during the interviews concerned the specialized scientific councils. One of the respondents believes that universities should not be allowed to assemble specialized councils in those fields that are non-major for them. Furthermore, a few respondents mentioned the lack of control of such councils. To their mind, the situation can be changed with one-time councils - the members of which will be assembled only for one particular defense of the thesis. There was also an idea to have an automated random assignment of PhD candidates to the special councils. So there should be a system which select the council of the defense randomly. It will make the corruption impossible or at least less possible, as the candidates will not be able to choose the councils for themselves.

One respondent thinks it will be a good idea to have some qualification requirements for the Ph.D. candidates - first of which should be proper English level. Another respondent believes it is best to diverge from the formalized criteria and take into account the quality

and possible practical usage of the paper. One of the respondents mentioned that *"we need to make the process as liberal for the candidates as possible: cancel the requirements on the number of pages, paragraphs and previous publications"*. Also, there was a suggestion to allow candidates to defend their theses when the paper is done without having them study a required number of years. One of the respondents believes there is a need to make up criteria for granting scientific degrees in such "specific" fields as culture and arts, PE/sport and marine specialties.

Some also expressed the need to establish qualification criteria for the members of the specialized councils. Besides, the universities should be responsible for the screening of such members and for defense process itself.

There were also respondents who were not ready to discuss the changes in the system of granting scientific degrees:

> *It is nonsense that the QA Agency has to decide something in the matter of granting scientific degrees.*

Plagiarism

Not all of the respondents agreed to estimate the level of Ph.D. theses that contain plagiarism.

Those who answered the questions feel strongly that the level of plagiarism in Ph.D. theses is high: they estimated it from 60% to 90%. The refusals to give an answer were explained by the unclear definition of plagiarism:

> *The matter of plagiarism is very wide. And it can not be decided just like that: one makes a citation here, does not make a citation there, this is plagiarism, that is not plagiarism.*

The respondents did not agree on the definition of plagiarism. One of them thinks it is more appropriate to talk about academic integrity:

> *We regard it as follows: if you copied one source it is plagiarism, two sources - compilation and three - you have a Ph.D. thesis.*

Due to these reasons, one of the respondents named the main goal of the Ethics Committee within Agency and Agency itself to define the meaning of plagiarism for each field.

Some of the respondents are sure that plagiarizing is a question for the applied sciences as the papers have to be written upon the research and experiments while in Law science *"...90% of the Ph.D. thesis is the law citations. So where can there be plagiarism? One can just forget to put a source"*.

Mostly respondents mentioned two ways to fight plagiarism: creating a national repository of academic texts and educating students about the academic integrity, in particular implementing the classes on academic integrity or on academic writing, as well as activities that raise awareness about the issue. Some of the respondents felt that there is a need to create some kind of nationwide software "Anti-Plagiarism" program which will be implemented in all of the universities and research institutions. Besides a lot of the respondents mentioned the importance of regulations: how the fact of plagiarizing may be proven, what kind of responsibilities and sanctions may be occurred. They also mentioned that the members of specialized councils that allowed the plagiarized thesis to be defended have to be banned from working in their field. Some thought that appropriate
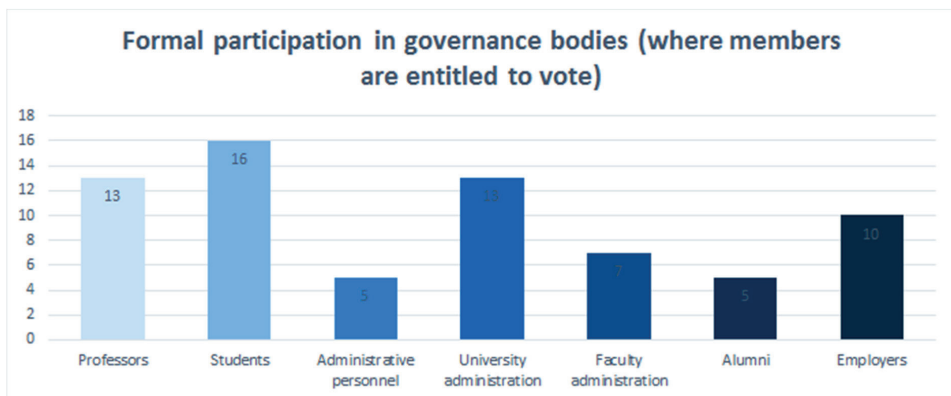
ways to fight plagiarism are the publicity of the investigated plagiarism cases and laying the responsibility on the opponents who read the thesis. One of the respondents believes that strengthening intellectual property defending rules is effective in preventing plagiarism, as it is in the author's interest to not allow the incorrect usage of his work. There will also be an extra motivation for the author: the money compensation in case his texts are copied.

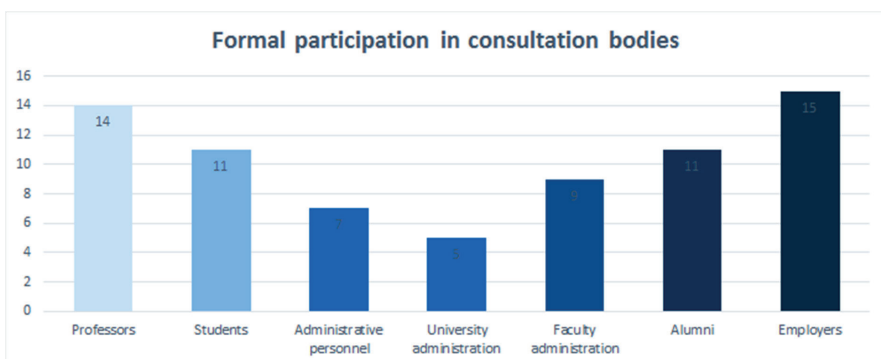One of the respondents summed up the question:

> *Plagiarism is everybody's fault: it is a fault of those who write, and of those who read, it is a complex problem in our academic environment.*

Participation of stakeholders in the process of quality assurance – links with business, professional associations, and student organizations.

The questions that address the role of different stakeholders in the process of quality assurance in higher education were taken from the report of the European University Association (Examining Quality Culture in European Higher Education). The respondents had to answer the question about the ways of involvement for the professors, university and faculty management, administrative personnel, students, alumni, and employers. The results are presented in chart below.

Formal participation in governance bodies (where members are entitled to vote)

Professors	Students	Administrative personnel	University administration	Faculty administration	Alumni	Employers
13	16	5	13	7	5	10

Almost all respondents (16 out of 17 interviewed) believe that students have to be involved in governance bodies where members are entitled to vote. The example of such involvement may be participation in the meetings of Academic Senate. The minority of respondents thinks that administrative personnel has to participate through such bodies.

Formal participation in consultation bodies

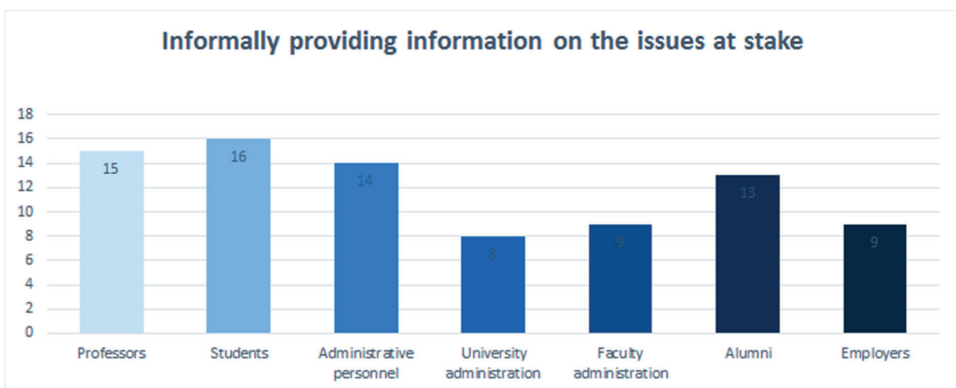| Professors	Students	Administrative personnel	University administration	Faculty administration	Alumni	Employers
14	11	7	5	9	11	15

The question of the stakeholders formal participation in consultation bodies was hard to comprehend for most of the respondents. Some of them at first did not understand what they are asked about and what kind of bodies are for consultations. After the explanation, most agreed that professors (14 respondents) and employers (15 respondents) should have this right. However, less than half of the interviewed members of Agency believe that the university leadership and administrative personnel should provide consultations.

**Formal involvement in self-evaluations or other evaluation activities**
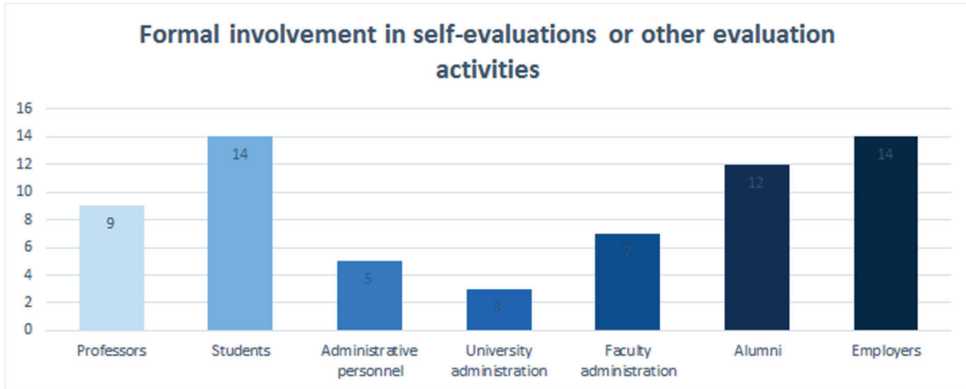
Most of the respondents believe that students, alumni, and employers should participate in the self-evaluation. Less than half of the respondents mentioned that this type of involvement should include the university leadership and administrative personnel. One of the members of Agency mentioned during the interview that only employers can evaluate the quality of education in the university:

> *No, this should not be at all. It is a biased opinion. Students are patriots. Professors are patriots. Only the employers can be involved.*

Informally providing information on the issues at stake

Majority of respondents (16) mentioned that students should participate by informally providing information about issues in university. Also, almost all respondents believe that professors, administrative personnel, and alumni could provide the quality assurance in the university in this way. All in all, most of the respondents believe it is best to involve all of the stakeholders, including the university leadership (8) and faculty leadership (9).

**Responding to the surveys on a regular basis (e.g. at the end of each course, academic year…)**
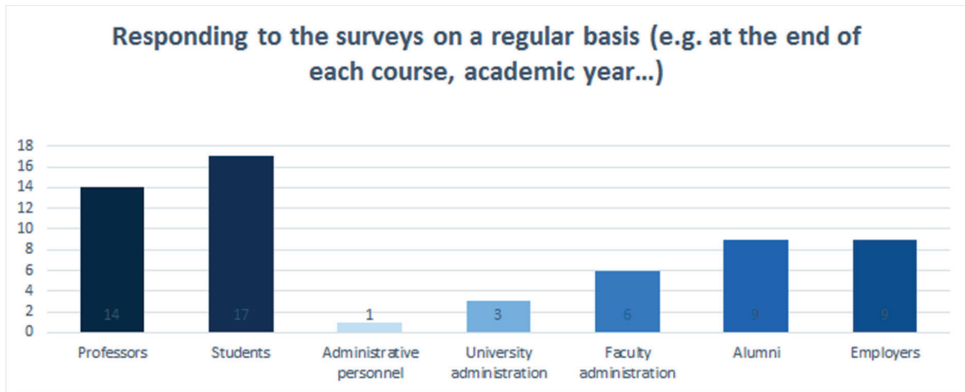
All of the respondents think that students should participate by responding to the surveys about the quality of education in their university on a regular basis. Also, most of them believe it is important to involve professors, alumni, and employers in such surveys. However, only a few think that it is necessary for the university and faculty leadership to participate. Only one of interviewed members of Agency believe that administrative personnel should be surveyed about the quality of education in their university.

One of the respondents mentioned that administrative personnel should not be involved in internal QA procedures. Another one does not see the need to involve the university administration.

Consolidation the responses allows us to compare the ways of participation and the level of involvement for the different stakeholders that are popular among the respondents.

In particular, the interviewed members of Agency see professors and students more involved than any other agents. Actually, they believe that students have to participate more than professors in all the activities, aside from the involvement in the consultation bodies.

Professors and students
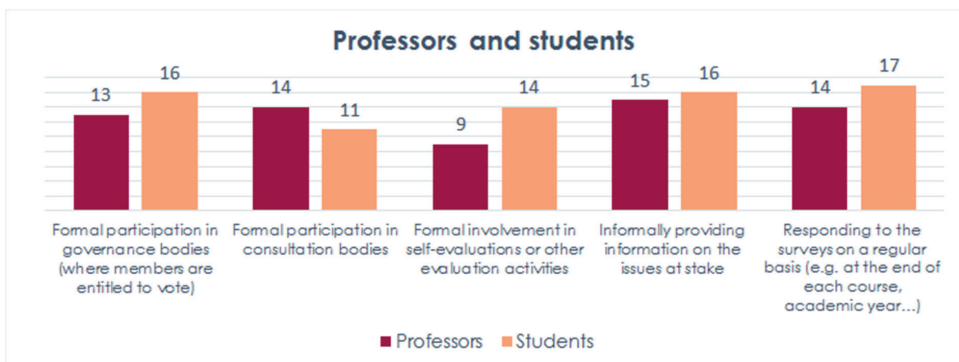
Most of the respondents believe that the university leadership has to be involved through formal participation in governance bodies. However, the rest of the administrative personnel has to participate mostly by informally providing information about different issues and matters.
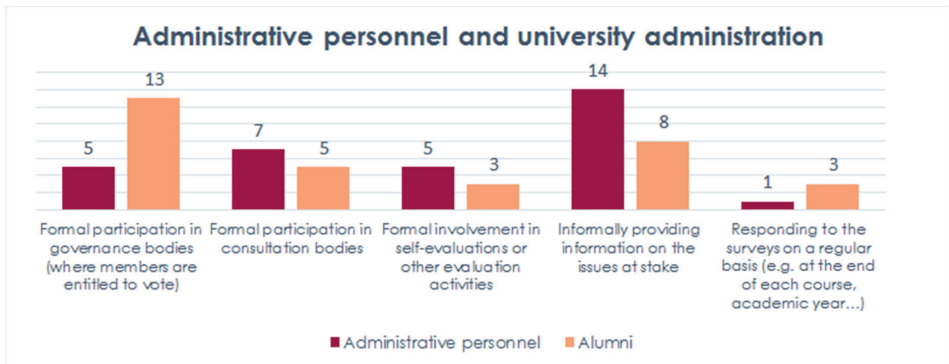
Respondents differ the ways of the alumni and employers' participation. Employers have to be involved in more formal ways while alumni should informally provide information. Although, most of the interviewees think that alumni should also be involved in the governance bodies as well as in the consultation bodies.
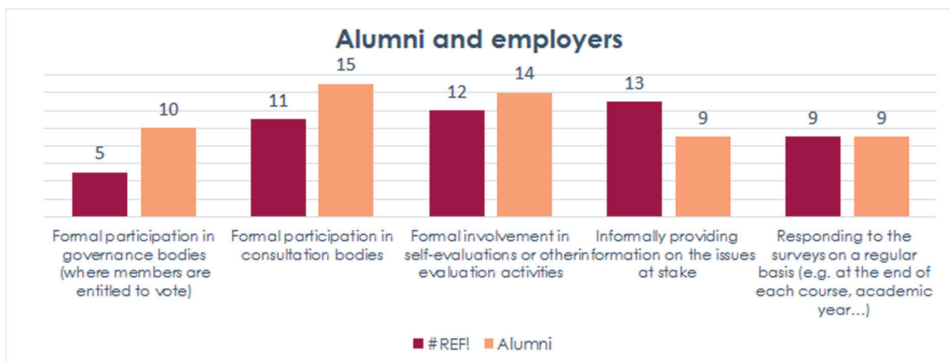
Indicators of quality – which numbers/parameters to trust

Most of the members of Agency who were interviewed named the employment rate as the dominant indicator of the quality of education in the university. There were also those who offered to take into the account alumni salary rates for each field of studies separately and independent opinions of the employers.

Other members of Agency believe that one of the important parameters is the result of studying: grades during first two years for bachelor programs or average level of academic record for whole program for MA level. Two respondents mentioned that human capital (mainly faculty members) is the main indicator.

There was also thought that regulations on the organization of the educational process is the most important indicator of the quality of education in the university. Such documents may show the unicity of the university and how the educational process is done there.

Among the indicators mentioned as less important than dominant one was no clear leader.

A few times respondents mentioned equipment and material support of the university, a lot of them believe that financial support to be an important parameter - first of all, extra budgetary means. The idea behind it was mentioned above: international sponsors and grant donors will not be willing to contribute to the universities that do not provide a high-quality education. Although not everyone talked about sponsorship or patronage when discussing university finance. Some of the respondents believe the fair salary for the professors is the indicator that university gives a quality education. Some mentioned the importance of the conditions for the professors: what are the teaching and housing policies and facilities.

Some of the respondents mentioned how important the student-related parameters are: how many students take part in the international conferences or write scientific papers. One member of Agency believes that the opinion of the students and academic community may point out the quality of particular university.

Among the indicators that also refer to the students' activity, the respondents mentioned the level of academic mobility, the level of knowledge of foreign languages (English in particular) and "IT-competences", and also more formalized parameters: grades for the MA theses and the overall grades of the State Examination Jury. They also mentioned social and environmental conditions for students. For example dormitories, the conditions of buildings, the medical office and the classrooms.

One more parameter that some respondents thought of was the scientific work of the university's professors: citation index, publications in the international journals, participation in international conferences. Furthermore, one respondent suggested taking into account the number of professors who work or have internships abroad as they represent Ukrainian universities.

One of the respondents believes that the level of professors' participation in the writing of the quality assurance strategy of the university is important, as well as the further involvement of the professors to the implementation of the strategy.

One of the respondents mentioned the value of the university to the society as the parameter that correlates with the quality of education. The value to the society may be measured in the number of libraries that was opened by the university, or in the fact that the university does some career-guidance in schools. Also one of Agency representatives mentioned only the parameters that are used for medical universities assessment.

Some respondents named the only one indicator - the alumni employment - as the main and only one that could correlate with the quality of education in the university. So there are no other parameters that could show the level of education.

Furthermore, one respondent believes that it is hard to talk about more or less important indicators in this case, as only the combination of factors matters.

Many respondents named the citation index in the bibliographic databases among the dominant parameter of the scientific performance in the universities. At the same time, some see the citation index, the number of publication in professional journals and the number of Ph.D. degree awarded as the formality, as these parameters have nothing in common with the quality of education, therefore can not be used for the evaluation. Also, some emphasize only one important indicator: either practical benefits (utility) of the scientific performance or the lack of plagiarism in the papers.

A lot of other indicators that are viewed as less important referred to the international acknowledgment: the scientists' participation in the international projects, internships abroad, contracts with foreign universities, membership on the editorial boards of the international and Ukrainian journals. The rest of the indicators that were mentioned by the

respondents referred to practical benefits: participation in the expert committees that consult the real economy sector (for example, in building, real estate appraisal and evaluation of the universities), the number of inventions put to work (the number or working patents, the amount of money the university got for these inventions).

One of the respondents believes that these indicators can not be universal. There are lots of sciences for which the citation index and the number of publications are relevant, but they can not apply to Ukrainian philology as their papers probably will be not interesting for the international journals. Also, a few members of Agency noted that it is important to separate the indicators for the applied and fundamental studies. One respondent claimed that investments and utility are the most important indicators for applied sciences. While it is important to take into account level of scientific schools, rankings - (both national and international) for fundamental studies.

One of the respondents gave the list of indicators that is used to evaluate medical universities.

Also, there was thought that it is more appropriate to evaluate each of the scientists individually (peers):

> *There is no such thing as the evaluation of scientific performance in the world…
> There should only be the evaluation of each scientist individually.*

Collaboration with independent QA agencies (professional associations etc.)

Most of the respondents did not give an answer to the question of the accreditation of the independent QA bodies. Mostly members of Agency explained that they did not study this issue so they can not comment on it. However, they mentioned that they could get back to it after the Agency meeting where the accreditation of the independent QA bodies will be discussed.

Those of the respondents who did answer had quite different thoughts about it. One is that it does not make sense to set up such bodies in Ukraine right now. First of all, there are no people qualified to conduct an expertize. Second of all, in other countries, these agencies support themselves, as the universities pay for the accreditations. However, universities in Ukraine will not do it, as there is no motivation for them. The lack of motivation is explained by the lack of students' interest in the reputation of the university, which is provided by the accreditation. So some respondents believe that one Agency is enough for Ukraine (at least for now).

However another respondent sees the need to create a network of such QA bodies, while Agency will be heading this network. The idea is that most of the work will be done by these independent QA bodies, and Agency will handle the function of the state control over the quality assurance.

Another member addressed the German practices, where they have a separate institution that does the accreditation of the independent QA bodies. It is the only function it has, so it does not conduct the accreditation of universities or programs. At the same time the respondent mentioned that he is not sure whether Agency has to provide the accreditation for the independent QA bodies and maybe it is better to separate these functions. However, if this duty remains at Agency disposal, the accreditation should be done based on the European standards and guidelines for quality assurance in higher education. Then the criteria for the independent QA bodies will include a regular reevaluation of their work,

improvement and transparency - publication of all the materials on the website and full openness to the academic community.

Two other respondents mentioned similar standards. One of them believes that Agency should provide accreditation based on *"the principles of proficiency, transparency, morality and following the rules and criteria with the foundations of publicity and consideration for public opinion"*. For another respondent, the most important parameter is no involvement of the people who plagiarized their papers in the work of the independent QA bodies.

Conclusions

The interviews showed that respondents have a similar thoughts on the legal framework of Agency, its composition procedure, the accreditation of programs and on how the scientific degrees should be granted: the current situation is mostly insufficient and needs to be changed. However, they have different thoughts on how the problems with should be solved and what are the indicator of the quality of education and scientific performance, as well as what roles should stakeholders play in internal quality assurance.

Most of the respondents do not agree with the current legislation on Agency. Mostly it means the need to specify the normative regulations of the institution and its authorities (including the wide range of duties, and separating the ones of the Ministry and the ones of Agency). Also, respondents criticize the composition of Agency and the distribution of quotas: under-representation of employers and over-representation of the public universities (in relation to the private ones). Also, the respondents are not satisfied with election procedure. One of the reasons is the lack of transparency, which can be solved with the election by secret ballot for those candidates who pass the bar of qualification requirements. Also the inadequacy of legitimizing the members of Agency through the government's act was mentioned. However, some respondents believe that it is more appropriate to comment on this matter after Agency will be active for some time.

The biggest problem with the current accreditation of programs is how formalized they are: most of the requirements are based on the qualitative parameters. Some respondents think that current procedure does not correspond to the European one. It was offered to change the criteria to the new ones: alumni employment and salary rates, and the indicators that would represent both the students' and stakeholders' opinions. Furthermore, the need to involve some international practices was often mentioned. Many respondents are sure that employers need to participate in the accreditation committees, some believe that students should participate as well. There was a common thought that experts involved in those committees should be professionals in the field that is related to the program which is getting accreditation. Furthermore, there is a need to create a list of requirements for such experts: the level of English, previous work experience in the field, academic degree.

It was suggested to carefully choose the experts to the committees, collect the information about their professional experience, a possible connection with the university, to avoid conflict of interest between them and the program they accredit. Less popular were ideas to rely on the expert's integrity, to have the standardized accreditation conclusions, ideas of fair pay, automatic random selecting, administrative or criminal responsibility and membership in the European Association for quality assurance in higher education.

Most of the respondents believe that the system of granting scientific degrees should be changed. In particular government should cancel additional payments that come with the degree, or switch to the non-budgetary funding of these benefits. Some other changes

address the work of specialized scientific councils: the need to control the specialization (to forbid the university to open special councils of non-major specializations), to control its work, to assemble the members only for one-time defense, provide a system that would randomly assign candidates to councils and specify the qualification requirements for the candidates (including level of English). Also, the changes to the defense procedure itself were discussed: the need to cancel the requirements on the number of chapters, pages and publications and the need to let the candidates to have a degree when the thesis is ready, without having to study a specific number of years.

Almost all of the respondents who agreed to evaluate the level of plagiarism declared a negative attitude towards it and are sure that there is a lot of it in Ph.D. theses in Ukraine. Also, they mentioned the unclear definition of plagiarism and the need to rather talk about the academic integrity.

Respondents offered some ways to fight plagiarism: educating students about the principles of academic integrity and creating a national repository of academic pupblications, creating a national software "Anti-Plagiarism" program, which will cover all the universities and research institutions, enforcement of regulation of this issue, the sanctions for the members of the specialized councils and opponents who allowed the plagiarized theses to be defended, publicity for the cases of plagiarism that were discovered and strengthening intellectual property.

Most of the respondents believe there is a need to include students, employers and alumni to the regular surveys about the quality of education in their university. For example, such surveys could be conducted after the end of each course or each academic year. Only a few of the respondents see the need to involve administrative personnel to the inner quality assurance procedures.

The informal providing of information about the issues turned out to be the most inclusive type of internal QA: most of the respondents think there is a need to take into account the opinions of all stakeholders.

The most important indicator of the quality of education in the university is the alumni employment, their salary rate and the opinion of the employers. The respondents also mentioned the academic results, the regulations on the organization of educational process in the university, the equipment and material facilities, the university's funds (sponsorships and grants, the salary of the professors), students' participation in international conferences, the level of English and "IT-competences", the papers written by students, the level of students' academic mobility and the value of the university to the society.

To evaluate the level of scientific performance in the university, the respondents offered to use the citation index in the international databases, the utility of scientific performance, absence of plagiarism in papers and international acknowledgment. Some respondents believe that citation index, the number of papers and Ph.D. degrees are just a formality and do not correspond to the quality science.

The hardest question for the respondents was the one about the accreditation of independent QA bodies. Most of them did not answer it either because they have not yet made sense of it or because the point is not yet taken further. Others believe that for now there is no need to set up these bodies, or at least rely on the international practices when doing so.