

ENQA Progress visit of 13 September 2021 on ANVUR developments since the external review of 2019

Statement of the experts

Based on the progress report ANVUR delivered to the panel of experts on 2 September 2021, and on the interviews carried out on 13 September with key stakeholder, the panel of experts acknowledges the efforts made by ANVUR to address the critical remarks received from the ENQA Board in 2019. Three topics were deeply analysed, as requested by ANVUR and foreseen for a progress-visit assessment:

1) Accreditation in the AFAM sector

The Agency is making significant efforts to improve the procedures for the accreditation of institutions and programmes in the AFAM sector (higher education in arts, music, theatre and dance), and to develop specific QA standards, fully compliant with the ESGs; concrete initiatives have also been taken to promote participatory assessment, with greater involvement of students and external stakeholders.

In July 2021 ANVUR created a Network of the Internal Assessment Panels (Nuclei di Valutazione) of AFAM Institutions. These Panels are composed, by law, of evaluation experts coming not only from the AFAM system but also belonging to professional organizations and social partners external to it but linked to the arts and music sectors. The Network aims to promote the active participation of a broad range of stakeholders in fostering debate around the major issues affecting the AFAM sector. Specifically, the activities of the Panels aim to foster an exchange of views between them and ANVUR and to encourage the development of QA policies and procedures in the AFAM sector.

Concerning the ENQA Board recommendation to extend consideration of the internal quality assurance processes described in Part 1 of the ESG to the AFAM sector, the revised "Guidelines for the accreditation of new programs" approved in 2020 state that external evaluation will be based on the internal evaluation Report drawn up by the Internal Assessment Panels of AFAM Institutions. The design of such Guidelines benefited from the advice of the stakeholders of AFAM Institutions. Moreover, an international Working Group supported ANVUR in the implementation of the first draft of the new "Standards and guidelines for the internal assessment of AFAM Institutions" in accordance with the ESG. The Network established by ANVUR in July 2021 will discuss the criteria and the guidelines proposed by ANVUR. New guidelines will be approved by the end of 2021 and will be in force for the 2022 (or 2023) Report.

Considering the involvement of student experts in the AFAM sector, in 2021 ANVUR revised the structure of the Register of Experts for the accreditation of AFAM Institutions and Programs. A "student evaluator" profile was included in the Register; students will consequently be systematically involved in the accreditation of new programs and Institutions starting from 2021.

The panel of experts acknowledges that, following ANVUR's observations, the Italian Ministry of Universities and Research (MUR) provided ANVUR with the opportunity to discuss AFAM issues in depth. The great majority of ANVUR's suggestions have been included in the Ministerial Note no. 1071/2021, which replaces Note no. 8093/2016, in particular giving ANVUR the opportunity to introduce ESG standards in the periodic accreditation. For initial accreditation, ANVUR is involved in the evaluation of teaching and infrastructure requirements, as well as in the evaluation of economic sustainability. These requirements are strictly defined by Presidential Decree no. 212/2005. For periodic accreditation, instead, thanks to Note no. 1071/2021, ANVUR will be allowed to introduce additional standards in line with the ESG, from 2022: "ANVUR carries out the periodic accreditation on the maintenance of the requirements pursuant to article 11 of the Presidential Decree no. 212/2005 taking also into consideration the Standards and Guidelines for Quality Assurance in the Higher Education Area".

This aspect will allow ANVUR to include all standards set in Part 1 of the ESG in the external assessment. For the definition of the first draft of these guidelines, ANVUR benefited from the advice of the International Working Group "Assessment and Quality Assurance of the Higher Education Institutions in the Arts, Music and Dance sectors (AFAM)", including international members appointed by MusiQuE (Music Quality Enhancement), EQ-Arts (Enhancing Quality in the Arts) and the ESU (European Students' Union). The draft of the Guidelines will be discussed with the Network of the Internal Assessment Teams as well as with AFAM stakeholders before the end of 2021.

The panel of experts encourages to continue efforts in order to develop, approve, adopt and implement all new instruments as soon as possible, in order to evaluate coherence and adequacy in view of ANVUR application to EQAR.

2) Accreditation of Ph.D. programmes

Following the ENQA external review, immediate discussions and actions were taken and planned by the Governing Board to address recommendations through specific actions within the following two years. As for PhD programs, the regulatory framework is currently still provided by the Decree no. 45/2013. ANVUR's intervention is limited due to the strict legal requirements. For this reason, its scope for action needs to focus on influencing the content of the future decree. The necessity of an update of the Decree had already been recognized by ANVUR in the past; based on the specific recommendations provided by ENQA, the previous Governing Board elaborated a proposal for a new Decree aimed at regulating Ph.D. programs in the Italian university system. The new Governing Board decided that the procedure needs further improvement to be fully compliant with ESG 2015; they approved a new proposal that was sent to MUR on May 26, 2021. The new text contains several novelties and specifically responds to a major recommendation by ENQA, by establishing that the accreditation procedures for Ph.D.

programmes will have to be defined following the European Standards and Guidelines, 2015 (ESG). At the time of the progress visit by the panel of experts a Ministry's Decree based on ANVUR's proposal was not yet released, although planned to become operational by the end of 2021.

The panel of experts stresses that it is of utmost importance to allow ANVUR operate in full compliance with the ESG. In the first half of 2022 the Agency plans to undergo international assessments. This makes regulatory intervention in the field of research doctorate programmes an absolute priority.

3) Complaint procedure

As an outcome of the 2019 external review, ENQA had judged that ANVUR's procedures for handling of appeals and complaints were "substantially compliant" with the ESGs, although recommending "to make more transparent and accessible the existing internal mechanisms, the actors involved and the detailed procedure of both complaints and appeals, respectively against procedural issues and against all decisions"; EQAR had subsequently decided to downgrade the evaluation to "partially compliant".

Since then, preliminary steps have been taken by ANVUR to address and guarantee the impartiality of the process in handling appeals. In fact, following an analysis of the procedures adopted by other Agencies and taking into account the indications by EQAR and the external Review report of ANVUR by ENQA, the Governing Board approved the establishment of a re-examination Committee, called "Comitato di Garanzia", and of a procedure for handling appeals. Members of the Committee are not yet appointed, as the Governing Board wanted to address this topic to the panel of experts and make the necessary formal adjustments, before the Committee is put in place and becomes operational.

The panel of experts acknowledges that the system foresees 4 formal steps of reconsideration of outcomes:

- Position statement of a HEI under assessment, once it receives the draft external assessment report (possibility of counter-arguments);
- Request for a re-examination by the Comitato di Garanzia, before ANVUR Board's proposal of decision is sent to MUR;
- Legal appeal procedure to MUR's decision;
- Complaint against procedural issues of any step of the procedure.

The panel of experts noted that the foreseen changes and the introduction of the Comitato di Garanzia seem in line with the ESG, although more clarity in the denomination/translation of bodies, their composition, their roles would help understanding the system, as well as clearer, transparent, well differentiated and published procedures for complaints, re-examination processes or appeals. All this shall be made explicit in all Guidelines addressed to higher education institutions, in any activity undertaken by ANVUR under the scope of the ESG, avoiding cross-referencing to other

documents, websites, laws and therefore maximizing the readability of user-friendly Guidelines.

It is recommended that the Committee's body be composed of members independent of the agency and of the higher education system in which the agency is embedded, otherwise it may create a perception of lack of independence. The same applies to the involvement of senior staff in the processes, as there is a need of clear differentiation between the body responsible for taking final accreditation decisions and the body responsible for resolving appeals.

It is very important to distinguish clearly between procedures for complaints (expressing disagreement with the conduct of the process or those who carry it out) and appeals (challenging the outcome of the procedure), be it against ANVUR's Board (request for a re-examination) or against the MUR's decision (legal appeal to the public court of justice). Each procedure requires a specific protocol.

Conclusion

With reference to AFAM and the doctorate, the panel of experts stresses the importance that the Ministry quickly completes the envisaged regulatory interventions, so that the agency can give full application to its planned activities, not only in sight of the next ENQA visit, but also in order to apply for inclusion in the EQAR register, and offer ANVUR the necessary support to complete some of the procedures that are still under development.

In particular, for the implementation of the ESG in the field of PhD programmes, the achievement of this objective needs the adjustment of the current legal framework and the adoption of consequent regulations. The panel of experts recommends to give the highest priority to this legal adjustment, allowing ANVUR to take further steps towards its strategic goals, namely achieving EQAR registration.

A clearer distinction between "requisiti di ammissibilità" (eligibility criteria) and accreditation standards might simplify the processes and the procedural activities that are to be in line with ESG Parts 1-2.

Finally, the panel encourages ANVUR to appoint the members of the Comitato di Garanzia in order for it to be operational, providing stakeholders with full transparency on any formal complaint, re-examination or appeal procedure.

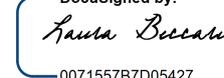
Barcelona, 19 October 2021

DocuSigned by:

B46A06178152498...

Mar Campins Eritja

Bern, 19 October 2021

DocuSigned by:

0071557B7D05427...

Laura Beccari