

ENQA TARGETED REVIEW

ARAGON AGENCY FOR QUALITY ASSURANCE AND STRATEGIC FORESIGHT IN HIGHER EDUCATION (ACPUA)

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22 APRIL 2026

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EXECUTIVE SUMMARY

This report analyses the compliance of the Aragon Agency of Quality Assurance and Strategic Foresight in Higher Education (La Agencia de Calidad y Prospectiva Universitaria de Aragón, ACPUA) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) Part 2 and 3. The report is based on an ENQA targeted peer review, following the methodology described in the Guidelines for ENQA Targeted Reviews and considering the Use and Interpretation of the ESG by the EQAR's Register Committee. In addition to the agency and its stakeholders, the report is meant to provide information for the ENQA Board's decision on ACPUA's renewal of membership and to EQAR to support the agency's reapplication to the register. The external targeted review was conducted from April 2025 to March 2026, with a site visit of the review panel in charge of the evaluation taking place between November 25 and 27, 2025.

ACPUA was established in 2005 by Law 5/2005 of 14 June, the Aragón University Education Act, as the official agency responsible for quality assurance in higher education in the Autonomous Community of Aragón (Spain). Its remit includes external evaluation, certification and accreditation of higher education institutions and programmes, promoting quality culture, strategic foresight and exchange with other university systems, and carrying out evaluations objectively, impartially and independently in accordance with its legal status as an autonomous public-law entity.

ACPUA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2016 and was first registered on the European Quality Assurance Register for Higher Education (EQAR) on 1 August 2016, and its current EQAR registration is valid until 30 June 2026.

The ESG Standards specifically addressed in this targeted review are standards with a partial compliance conclusion in the EQAR Register Committee's last renewal decision, specifically ESG 2.4 Peer-review experts - whether the agency includes student members in all panels of its activities. Additionally, the following were considered, ESG 2.1 to 2.7 for the following activities: Institutional Accreditation Renewal (Institutional Follow-up Accreditation); Certification ODS/Agenda 2030 (ALCAEUS Programme); and PACE-SIGC (IQAS Certification), covering areas where changes were made; ESG 2.1 Consideration of internal quality assurance; and a selected enhancement area: ESG 2.2 Designing methodologies fit for purpose.

The panel considered the evidence given in the self-assessment report (SAR) and the additional evidence requested by the panel and provided by the agency (full list of additional documentation is in Annex 4). The panel also performed a site visit, during which meetings were held with a wide range of stakeholders.

The review panel thoroughly analysed and discussed all the evidence, concluding that ACPUA is compliant with the ESG. The summary table below provides more detail.

Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review ¹	Compliance transferred from the last full review ^{2 3}
2.1	Compliant	N/A
2.2	Compliant (For new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.3	Compliant (For new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.4	Compliant	N/A
2.5	Compliant (For new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.6	Compliant (For new QA activities only)	Substantially Compliant → Compliant (for QA activities reviewed during the previous full review only)
2.7	Compliant (For new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
3.1	Not included in the targeted review	Fully compliant → Compliant
3.2	Not included in the targeted review	Fully compliant → Compliant
3.3	Not included in the targeted review	Fully compliant → Compliant
3.4	Not included in the targeted review	Substantially compliant → Compliant
3.5	Not included in the targeted review	Fully compliant → Compliant
3.6	Not included in the targeted review	Substantially compliant → Compliant
3.7	Not included in the targeted review	Fully compliant → Compliant

¹ Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

² Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

³ The last ENQA review occurred in 2020/21. The SAR was prepared in 2020, and the site visit took place in 2020. The report was published in 2021. References to this review in this report will be referred to as the 2020 review, even when referring to a matter stated in the 2021 report.

INTRODUCTION

This report analyses the compliance of the Aragon Agency of Quality Assurance and Strategic Foresight in Higher Education (Agencia de Calidad y Prospectiva Universitaria de Aragón, ACPUA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). ACPUA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2016 and has also been registered in the European Register of Quality Assurance Agencies in Higher Education (EQAR) since 2016. Established in 2005 by Law 5/2005, of June 14, on the Regulation of the University System of Aragon, ACPUA is the official agency for the evaluation of higher education in the Autonomous Community of Aragon (Spain).

The agency's formal objective is to "[promote] the quality of the University System of Aragon favouring its relationship with the business and labour world, and with the whole of the society." As indicated in the "About us" section of ACPUA's website⁴, it aims to promote a quality culture in the field of higher education in Aragon by fostering "the exchange of experiences with other university systems". It is established as an autonomous body with own legal personality, assets and capacity to pursue its objectives. It is governed by its own bylaws, approved in 2006 (Estatutos, Decree 239/2006, of 4th December). Its membership of ENQA and registration with EQAR aim to both demonstrate compliance with the ESG and evidence this compliance formally and publicly.

The external targeted review was conducted over an eleven-month period from April 2025 to March 2026. A site visit of the review panel took place between 25 and 27 November 2025. This report should be read together with the external review report of the agency's last full review against the ESG, published on 24 June 2021⁵.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

ACPUA's first review with ENQA, which was also employed to register with EQAR, took place in 2016. Following the agreed review cycles established by ENQA and EQAR, ACPUA underwent a subsequent external review in 2020, concluding in 2021 and is now applying for the further renewal of ENQA membership and separately of EQAR registration based on a targeted external review against the ESG coordinated by ENQA.

As ACPUA has undergone two successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by considering Standards that were found partially compliant during the agency's last renewal of registration in EQAR: in considering the 2021 ENQA review report EQAR did not agree with the judgement on compliance with standard 2.4 Peer Review Experts. EQAR concluded that ACPUA was partially compliant with this standard due to the absence of student participation in the Higher Education Institutions Initial Accreditation Programme. Accordingly, this standard was

⁴ <https://acpua.aragon.es/en/about-us>

⁵ See footnote 3.

identified as one for particular attention during the 2025 review. Additionally, a targeted review includes focus on standards that have been affected by substantive changes during the past five years while at the same time focusing on the enhancement part of the review. ACPUA received a finding of substantial or full compliance with all of the ESG Standards in both the ENQA 2016 and 2020 reviews.

SCOPE OF THE REVIEW

From the beginning of the review process, the panel took note of the Terms of Reference (ToR) which determined the scope of the review. The following external quality assurance activities, encompassed by the ESG and conducted by ACPUA are deemed to be within the scope:

- Study programme initial accreditation
- Study programme accreditation
- Study programme follow-up
- Training school accreditation
- Higher education institutions initial accreditation
- Teaching activity evaluation system audit (DOCENTIA programme)
- Teaching staff evaluation system audit
- Partner Higher Education Institution (HEI) evaluation
- PACE SIGC (IQAS Certification)
- Institutional Accreditation
- Institutional Accreditation Renewal (Institutional Follow-up Accreditation)
- Certification ODS/Agenda 2030 (ALCAEUS Programme)

The following ACPUA activities are outside the scope of the ESG and will not be commented on in this report:

- ACPUA Quality Seminars
- University research institutes initial accreditation and accreditation renewal
- Evaluation of research activities
- Junior academic staff research activity evaluation
- Strategic foresight studies / surveys
- Consultancy: support to decision making process

Specifically, the review considers the following:

- I) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
 - a. ESG 2.4 Peer-review experts - whether the agency includes student members in all panels of its activities.

- 2) Standards 2.1 to 2.7 for the following activities:
 - a. Institutional Accreditation Renewal (Institutional Follow-up Accreditation)
 - b. ALCAEUS programme
 - c. IQAS Certification (PACE-SIGC), covering areas where changes were made and at least the following in detail:
 - ESG 2.2 Designing methodologies fit for purpose – are the standards fit for the evaluation of the new objectives and how the agency has consulted all relevant stakeholders when updating the methodology;
 - ESG 2.5 Criteria for outcomes - are the updated standards consistently implemented;
 - ESG 2.6 Reporting – are reports resulting from the ACPUA's updated methodology for Internal Quality Assurance Certification published.
- 3) ESG 2.1 Consideration of internal quality assurance
- 4) Selected enhancement area: ESG 2.2 Designing methodologies fit for purpose

MAIN FINDINGS OF THE 2020 REVIEW

The previous ENQA-coordinated review took place in 2020 and its findings, published in 2021⁶, were also used for ACPUA's registration with EQAR. The ENQA review found ACPUA to be compliant or substantially compliant with all standards of ESG. Alongside a variety of commendations relating to ESG Standards 2.2, 2.4, 3.1, 3.5 and 3.6, the 2020 ENQA review provides recommendations to ACPUA on specific standards on how to further improve. In considering the review findings EQAR found ACPUA compliant with all the standards except for ESG 2.4 Peer-review experts where the agency was found partially compliant. This is further elaborated in the section of this report presenting findings of ACPUA's compliance with ESG (starting at page 16). EQAR concluded that, overall, ACPUA continued to comply substantially with the ESG. This report acknowledges the status of ESG Standards found to be compliant with ESG in the last full review. At the same time, it addresses EQAR's remarks, particular with regard to ESG 2.4.

After the external review in 2020, ACPUA was granted ENQA membership for five years and inclusion on the EQAR Register until 30 June 2026⁷.

REVIEW PROCESS

The 2025 external targeted review of ACPUA was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the *EQAR Procedures for Applications* and in accordance with the timeline set out in the ToR. The panel for the targeted review of ACPUA was appointed by ENQA and was composed of the following members:

- Maria E. Weber (Chair), Head of Department Policy and Procedural Development, Agency for Quality Assurance and Accreditation Austria; ENQA nominated

⁶ See footnote 3

⁷ https://acpua.aragon.es/sites/default/files/tmp/2021_10_eqar_renewal_letter_acpua.pdf

- Tara Ryan (Secretary), Director of Education Services and Quality, Irish Management Institute, Ireland; EURASHE nominated
- Ondrej Havelka (Panel member), Student, Czechia; ESU nominated, member of the European Students' Union Quality Assurance Student Experts Pool
- Jordi Villà i Freixa (Panel member), Professor, Universitat de Vic – Universitat Central de Catalunya, Spain; EUA nominated

Milja Homan, Projects and Reviews Officer, ENQA, acted as the review coordinator.

ACPUA produced a SAR that provided the basis for the review panel's evaluation. Panel members received the SAR from ACPUA on 7 July 2025 and immediately began to evaluate its contents in line with the approved ToR. An introductory meeting with the ENQA coordinator and EQAR's representative (who joined in only at the beginning of the meeting) took place online on 29 September 2025 and was followed by a subsequent meeting of the panel online. A kick-off session, also held online, occurred on 3 November 2025, beginning with the panel's internal meeting and followed by a clarification meeting with the agency's resource person.

During these meetings, the panel particularly sought to understand the role of the Board of Directors (BoD): how it is appointed; how it interacts with the agency's staff; its role in developing strategy and in providing organisational direction; and how it discharges its oversight function, given the context of the region's small size and the strong relationships between the different stakeholder groups. The panel also wanted to clarify the changes that the agency has undergone since the last full review against the ESG, and the precise status of the three processes which are in the focus of the review: **Institutional Accreditation Renewal (Institutional Follow-up Accreditation)**, **ALCAEUS Programme** and **PACE -SIGC (IQAS Certification)**. The panel confirmed that the key change during the review period was the appointment of a new Director. Other changes, such as aligning processes with new legislation or guidelines, such as the changes to the PACE -SIGC (IQAS Certification), were minimal. The meetings also provided an opportunity to gain insights into why agency chose the self-selected ESG standard for enhancement (ESG 2.2).

The review panel's pre-visit meeting and preparations for the first day were organised in person in Zaragoza, Aragon, on 24 November 2025. From 25 to 27 November 2025, the panel conducted an onsite visit to ACPUA, where it further examined the information and statements provided in the SAR in more detail, cross-referencing them with other evidence provided by the agency. Translation services were utilised, with most agency and stakeholder interactions requiring translation from Spanish to English and vice versa. While professional, this did curtail the availability of time for dialogue and critical analysis.

Following the conclusion of the site visit, the review panel produced the external review report (EER), which was based on the SAR, additional information provided by the agency at the panel's request, information collected during the site visit, and other evidence (e.g., ACPUA's website, published protocols, guidance handbooks, and previous external evaluation reports). The panel provided ACPUA with an opportunity to comment on the factual accuracy of the draft report. The review panel confirms that it was given full access to all documents and persons it wished to consult throughout the review process, and that all panel suggestions and requests were responded to with courtesy and positivity.

Self-assessment report

The SAR was delivered on time. It was a concise text providing information and links to the website, which contained additional details and information about its current activities and procedures. The SAR included details on how it was prepared, described the changes implemented in ACPUA and in its regulatory context since the 2020 review, and presented a self-analysis against the ESG Standards and the areas identified in the ToR. It also included a SWOT analysis. The SAR also described how a new strategic plan for the agency was developed and that it was aligned with the preparations of the agency for the ENQA review.

The SAR also included a dedicated section on ESG 2.2 Designing methodologies fit for purpose, which was the area selected for enhancement in the targeted review. While the review panel found the SAR to be well structured and informative, with key data points presented clearly in tabular form, the panel also noted that it was less reflective and analytical than it could have been, tending instead towards a descriptive style.

The rationale for selecting ESG 2.2 as the self-selected enhancement area for the targeted review could have been explained more clearly, as could its contribution to improvements in the agency's processes.

The previous review resulted in ENQA and EQAR reaching different conclusions regarding compliance with ESG 2.4. In response to concerns raised by EQAR, ACPUA subsequently amended its evaluation protocols to include student members on panels where students had not previously been represented.

This change was reported in the SAR. However, the panel felt that the explanation was more descriptive and summative than reflective and methodologically justified. Among other things, it remained unclear whether the agency considered student involvement to be appropriate for these types of procedure (HEI Initial Institutional Accreditation, Partner HEI) in accordance with ESG 2.4. During the on-site visit, however, ACPUA staff convinced the panel that involving students in these, and in principle all activities is beneficial. Taking students' perspectives into consideration is of the utmost importance to ACPUA in all its activities. This is explained in more detail in the relevant sections in this report. The panel investigated this area thoroughly during the site visit and had the opportunity to verify various positive features identified in the SAR, e.g. the infographic on student counselling.

When considering the SWOT analysis, the relationship between the identified weaknesses or threats and the remedial actions taken was not always clearly explained. For instance, the threat of 'low visibility in Aragonese society' would have benefitted from further contextual explanation given the contrasting points regarding the strength of the 'close relationship with Aragonese universities', as well as the commendation of ACPUA for stakeholder engagement in the 2020 review. Similarly, the weaknesses and threats may have been reframed as targeted opportunities for development, for instance some elements of the evaluation processes could have been simplified.

The panel read the SAR alongside the documents of the previous ENQA full review (2020), and the additional material requested from the agency, as stated above, in order to gain a comprehensive understanding of ACPUA and its operations.

Site visit

The site visit took place in person from 25 to 27 November 2025. The visit schedule was agreed with the agency (Annex I). The panel found the visit to be well planned and organised, and the

review panel was able to meet and interview all key internal and external stakeholders of the agency, including persons (social partners, academics, students) who participated in various evaluation procedures. The panel met with the Director of the agency; members of the BoD; and members of technical committees of the agency, i.e. Committee of Experts, the agency's advisory body; the Appeals Committee, a technical body responsible for supervising the proper conduct of the agency's evaluation, certification and accreditation procedures and for reporting on appeals against decisions of the Director; a Commission of Evaluation, Certification and Accreditation (CECA), the technical body that prepares and approves the agency's evaluation methodologies, protocols and procedures; and the Institutions Evaluation Committee (SEC) which works mainly with the procedure certifying the internal quality assurance systems of faculties and university schools and in institutional accreditations⁸. At a dedicated meeting with ACPUA's identified stakeholders, the panel met with staff of other quality assurance agencies, ministry officials and social partners, as well as students. In addition, the views of the stakeholders were presented at meetings with technical committee members and evaluators. The panel also held meetings with leaders of the two regional universities, as well as with representatives from the relevant Ministry and parliamentarians.

Dialogue during the meetings involved teasing out issues presented in the SAR and the documentary evidence, triangulating and validating the findings, and providing the basis for panel judgements. Although there was a session explicitly dedicated to the chosen enhancement area - ESG 2.2 Designing methodologies fit for purpose - a focus on this area was woven into many of the meetings to ensure that optimal feedback could be provided. The tone of discussions at all of meetings was open, collegial and engaged. The staff members of the agency were very responsive, and communication was easy and effective notwithstanding the need to use the support of a translator. As indicated above, the use of translation necessitated a slower pace and a less than fluid dialogue than might have been possible without it. Additional documents or clarifications requested during the site visit were swiftly provided.

At the end of the site visit, the panel held a final private meeting to discuss and agree on the preliminary conclusions on the level of compliance with each of the ESG Standards under the scope of the targeted review, as well as main findings on ESG 2.2 as the enhancement area and formulated suggestions for enhancement accordingly. High level feedback was shared with the agency during the final debriefing meeting. Subsequent to the site visit, the panel secretary drafted the report in cooperation with the chair and other panel members. The draft report was submitted to ACPUA for fact checking on 27 February 2026 and then finalised and sent to ENQA on 23 March 2026.

CHANGES WITHIN THE AGENCY

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

Since the last review in 2020, the national legal framework for higher education in Spain has experienced several changes, one of organic law, and three royal decrees, namely:

- Organic Law 2/2023 of 22 March on the University System, which replaces Organic Law 6/2001 of 21 December on universities.
- Royal Decree 822/2021, of 28 September, established the organisation of university education and the procedure for quality assurance replacing Royal Decree 1393/2007, of 29 October, which established regulation on the organisation of official university education.

⁸ The panel did not meet with members of Research Evaluation Committee (SEI) which acts in all evaluation processes related to the research activity of individuals or institutions; and the Faculty Evaluation Committee (SEP) which looks after the evaluation for the accreditation of hired professors with clinical links.

- Royal Decree 640/2021, of 27 July, on the creation, recognition and authorisation of universities and university centres, and institutional accreditation of university centres, replacing Royal Decree 420/2015, of 29 May, which regulated the creation, recognition, authorisation and accreditation of universities and university centres.
- Royal Decree 576/2023, of 4 July, which amended Royal Decree 99/2011, of 28 January, regulating official doctoral studies.

As explained in the SAR and during the site visit these regulatory changes did not involve any significant alterations to the agency's external quality assurance procedures, criteria or methodologies. Rather supporting documentation for some processes required amendment to ensure clear alignment with the new regulations. These updates to guidelines were undertaken by ACPUA in collaboration with the Spanish Network of University Quality Agencies (REACU).

The changes for procedures at the level of study programmes were:

- The study programme initial accreditation review process was simplified. Initial accreditation of a degree programme is an ex-ante process. Once a degree has been accredited or approved, and is offered at an institutional accredited centre, the centre may make a "non-substantial modification" (i.e. there is no change in the nature, objectives and fundamental characteristics of the registered title) without applying to ACPUA for approval.
- The period of the study programme review cycle changed. Previously, the review cycle was four years for a Master's degree and six years for all other programmes. Now, all degrees are reviewed every six years, except for those with 300 or 360 ECTS, which are reviewed every eight years.

Several small amendments were also made to institutional or centre approval protocols. In the Spanish context, Higher Education Institution – *HEI* - accreditations refer to the accreditation of a university centre, i.e. a faculty or school, rather than a university itself (or equivalent). ACPUA's initial accreditation process for HEIs is an ex-ante procedure for approving a proposed new university centre. Institutional Accreditation, a separate process, occurs where a centre already has its internal quality assurance certified by an agency registered with EQAR, and where at least half of its bachelor, master and PhD programmes have had their accreditation renewed at the time of application. Institutional Accreditation Renewal (Institutional Follow-up Accreditation) refers to the re-approval of a university centre after it has been operating as an approved centre for a six year period of time.

- The protocol for the initial institutional accreditation of higher education institutions has been modified to include new dates and amended official titles of the revised regulations. However, no content or procedural detail was changed. In January 2025, ACPUA also updated the evaluation procedure to in response to the recommendations of the 2021 EQAR report, adding a PhD candidate to the evaluation panel to represent students.
- The rules regarding which entities must participate in the institutional accreditation process have been amended. Centres that provide doctoral programmes are now included, whereas previously only centres that offered bachelor and master degrees were included. Additionally, study programmes offered by centres with institutional accreditation are now exempt from separate or distinct programme monitoring and accreditation follow up processes.

The University System of Aragon (SUA) is composed of two universities (one public, the University of Zaragoza, the other private, the University of San Jorge) and four centres of higher artistic education. Since the previous ENQA review the most significant change has been the gradual

implementation of institutional accreditation, a voluntary process under Spanish legislation. University centres may opt for this type of assessment, moving from the study programme accreditation (individual assessment of their degree programmes) to institutional accreditation (joint assessment of the centre and its degree programmes). In 2025 approximately 90% of SUA bachelor's and master's degrees are taught in institutionally accredited centres.

The first Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedures were carried out during the 2024/2025 academic year. They were undertaken as a pilot process, and a meta-evaluation of the pilot, in the same period, resulted in changes to the framework protocol approved in January 2025. Specifically, the University of Zaragoza renewed the institutional accreditation of two of its centres at the start of 2025 through the pilot process⁹. Subsequently the University of San Jorge underwent the process of renewing the institutional accreditation of its three centres in the last quarter of 2025, during which time the site visit took place. This was the first application of the post-pilot Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure.

In relation to the international scope, the most relevant milestone for the SUA is the participation of the University of Zaragoza in the Alliance of European Universities called Universitas Montium (UNITA). This is a European Commission competitive project in which the University of Zaragoza and five other university institutions participated in the first phase in 2020. The second phase is currently ongoing with the involvement of eleven other universities. Since its inception, ACPUA has participated in this project as a partner of the University of Zaragoza, also holding the positions of President and Vice-President of the Internal Quality Evaluation Committee (QEB) of this Alliance. This is primarily a university-led project, in which ACPUA is not undertaking any external quality assurance function.

ACPUA'S ORGANISATION/STRUCTURE

The key events during the review period were the following:

- Establishment of a pro temp Thematic Evaluation Committee (SETE) to advise on the strategic planning process.
- Establishment of the Faculty Evaluation Committee (SEP).
- Adaptation of evaluation protocols to the new national regulations, as mentioned above.
- Follow-up to the ENQA 2020 evaluation.
- Extension of the term of the Strategic Plan 2019-2022 for two financial years.
- Resignation of the director of ACPUA, Mr. Antonio Serrano González (8 March 2023) and appointment of the new director, Ms Cristina Rodríguez Coarasa (8 November 2023).
- Drafting of the new Strategic Plan 2024-2028.

Some of the changes are interrelated. A temporary committee, SETE, was appointed to support work associated with the 2019-2022 strategic plan, whose time period was extended to cover the period during which one agency director resigned, and a new person was appointed. This extension

⁹ https://gd.aragon.es/cgi-bin/EVTI/BRSCGI?CMD=VERLST&BASE=EVTI&DOCS=I-100&SEC=EVTI_PUBL&SORT=%40TIIN&SEPARADOR=&TIIN-C=institucional&UNIV-C=&CENT-C=&RAMA-C=&TITI-C=&ANEM-C=&TITU-C=&OPI=Y

was intended to provide an appropriate timeframe for the newly appointed director (November 2023) to oversee the development of the new strategic plan. Overall, the structure and functions of the agency's existing governing and technical bodies have not changed other than as listed here.

ACPUA'S FUNDING

Allocation of funding to ACPUA by the Government of Aragon has been identical since 2020, with ACPUA spending between 77% and 91% of the budget annually. The highest expenditure, 91%, occurred in 2024, reflecting the fact that all vacant positions were filled. The agency also raises some very modest income directly through the conduct of evaluations outside of the SUA region, ranging from approximately €5k to €20K in 2024.

ACPUA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The SAR and the previous 2020 review report described two new external quality assurance activities – Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and the ALCAEUS programme – launched during that period, although no procedures had yet been carried out at the time of the 2020 review. In addition, the PACE-SIGC (IQAS Certification) protocol was updated in 2024 to reflect national regulatory changes made at that time, whereby Doctoral Schools were included within the scope of this procedure.

For this reason, the following sections will discuss in detail these three protocols and also the changes relating to ESG 2.4 within the two procedures identified by EQAR as requiring amendment. This is appropriate, given that, apart from the points mentioned above, the agency has not undergone any further changes in terms of tasks, activities or procedural implementation. For all other areas, the evidence presented in the 2020 Review report remains applicable.

The Institutional Accreditation Renewal (Institutional Follow-up Accreditation)¹⁰ takes place six years after the institutions have achieved initial institutional accreditation. Initial institutional accreditation is achieved once the institution has a certified internal quality assurance system (IQAS) – via the PACE-SIGC (IQAS Certification) the process within the SUA – and the accreditation of at least half of their bachelors, masters or doctoral programmes has been renewed. Six years later, the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) must confirm that the institution continues to operate an effective IQAS. This involves demonstrating that the institution systematically collects and analyses information on its programmes, uses this evidence to inform decision-making, and ensures that students both have a learning environment in which they have reasonable opportunities to achieve the intended learning outcomes, and that there is evidence that they do so.

As mentioned above, two centres in Aragon were evaluated as a pilot for the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure in 2024. Once both evaluations had been completed, a meta-evaluation of the process was carried out, with the participation of the evaluators and representatives of the evaluated centres. This led to proposals for improvement. After analysing the results of this meta-evaluation, on 31 January 2025, the CECA approved the final version of the protocol documents for the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) process. The first of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedures post-pilot, were being undertaken during the time of the 2025 ENQA panel site visit.

¹⁰ https://acpua.aragon.es/sites/default/files/250131_institutional_accreditation_renewal_en.pdf

The ALCAEUS Programme for Sustainable Development Goals (SDG)/Agenda 2030 certification¹¹ is an international assessment protocol that measures the degree to which university centres are committed to the SDGs set out in the United Nations (UN) 2030 Agenda.

The certification's primary objective is to raise awareness of the efforts institutions are making to comply with the SDGs. The process involves awarding a seal/mark based on one of four certification levels, which are linked to the score obtained in the assessment. Only HEIs which are accredited by an EQAR-registered agency are eligible to apply and must first demonstrate that they have a certified Institutional Quality Assurance System (IQAS).

The first implementation of the ALCAEUS Programme took place at the end of 2021, when ACPUA conducted two pilot evaluations at two centres of the University of Zaragoza. The final reports were published in March 2022. A meta-evaluation of the programme was then carried out with the participation of the stakeholders. Following analysis of the pilot results, the CECA approved the final version of the ALCAEUS Programme documents on 24 June 2022. No application for ALCAEUS Programme has been received since the pilot, and accordingly, no implementation of the post-pilot procedure had taken place by the time of the ENQA targeted review.

As indicated above, due to the state regulatory changes, the PACE-SIGC (IQAS Certification) programme¹² has been updated to include Doctoral Schools within its scope. The new version of the evaluation protocol, incorporating new guidelines established by the national regulations, was approved in the first half of 2024. In 2024/2025, PACE-SIGC (IQAS Certification) were carried out according to the new protocol. Although there were no changes to the methodology, the certification's scope was widened to include Doctoral Schools.

With regard to the number of procedures carried out between 2020 and 2025, the agency states that the number depends on the activities of the universities. The numbers below (page 12 of the SAR) show that certain procedures and activities took place in recent years. Regarding initial accreditation or modification of programmes, it was explained that these apply due to the definition of new PhD, Bachelor's and Master's degrees, or changes to existing ones.

Regarding the renewal of programme accreditation, the agency explained that there has recently been a decrease in the number of evaluations due to an increase in institutionally accredited centres, as well as a change introduced by Royal Decree 822/2021, which increased the evaluation period for Master's degrees from four to six years. It also explained that the renewal of accreditation of all 50 PhD programmes at the University of Zaragoza in 2021 was an intensive workload. In recent years, the workload coming from quality assurance activities has been balanced; therefore, the agency has invested time in focusing on other tasks, such as the ACPUA+ series and similar analyses and activities.

¹¹ <https://acpua.aragon.es/en/acpua-certification-programme-2030-alcaeus>

¹² <https://acpua.aragon.es/en/pace-sigc-iqas-certification>

EVALUATION	2020	2021	2022	2023	2024	2025
PROGRAMMES						
Study programme initial accreditation	26	20	8	34	41	36
Study programme accreditation	5	61	4	1	6	-
Study programme follow-up ¹⁷	-	-	-	-	-	-
INSTITUTIONS						
Training schools accreditation	1	1	1	1	1	-
Higher education institutions initial accreditation	-	-	-	-	-	-
Teaching activity evaluation system audit (DOCENTIA Programme)	-	-	-	-	-	-
Teaching staff evaluation system audit	1	1	1	1	1	-
Partner HEI evaluation	-	-	-	-	-	-
PACE-SIGC (IQAS Certification)	3	1	1	2	1	2
Institutional accreditation	2	3	-	2	3	-
Institutional Accreditation Renewal (Institutional Follow-up Accreditation)	-	-	-	-	2	-
Certification SDG/Agenda 2030 (ALCAEUS programme)	-	-	2	-	-	-

Table 1: Number and types of evaluations undertaken over the review period (See SAR p.12-13)

FINDINGS: COMPLIANCE OF ACPUA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

ESG PART 3: QUALITY ASSURANCE AGENCIES

The present, targeted review does not include the ESG Part 3 Standards, as the EQAR Register Committee found ACPUA compliant with ESG 3.1-3.7 during the previous review. The compliance is therefore transferred to this review.

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

2020 review recommendation

The panel recommends that ACPUA develop a coherent approach to address more explicitly student-centred learning (SCL), teaching and assessment in its evaluation methodologies, and pay special attention to these issues in its training for reviewers.

Evidence

The external quality assurance processes of ACPUA were presented in the SAR mapped to Part I of the ESG.

Annex I. Translation of standards 1.1-1.10 into the ACPUA criteria and processes

ESG PART 1	EVALUATION OF PROGRAMMES	
	Study programme initial accreditation	
	Study programme accreditation	
	Study programme follow-up	
	1.1. Policy for quality assurance	Criterion 8. Internal Quality Assurance System
	1.2. Design and approval of programmes	Criterion 1. Justification of the degree
	1.3 Student-centred learning, teaching and assessment	Criterion 2. Objectives and competencies
	1.4. Student admission, progression, recognition, certification	Criterion 4. Curriculum planning
	1.5 Teaching staff	Criterion 3. Student admission and access
	1.6 Learning resources & student support	Criterion 5. Academic staff
	1.7 Information management	Criterion 6. Material resources and student services
	1.8 Public information	Criterion 8. Internal Quality Assurance System
	1.9 On-going monitoring and periodic review of programmes	Criterion 8. Internal Quality Assurance System
	1.10 Institutions should undergo external quality assurance in line with the ESG on a cyclical basis	Criterion 8. Internal Quality Assurance System (*1)
REFERENCE DOCUMENT		(*2)

ESG PART 1	EVALUATION OF INSTITUTIONS					
	Training schools accreditation	Teaching staff evaluation system audit	Higher education institutions initial accreditation.	Partner HEI evaluation	DOCENTIA	Institutional accreditation
	1.1. Policy for quality assurance	Evaluation based on degree follow-up reports	Criterion A. Teaching and Students	Criterion 1. Teaching and Students	Dimension 1. Planning	Assessment based on PACE-SIGC certification (*8)
	1.2. Design and approval of programmes		Not applicable	Not applicable	Dimension 1. Planning	
	1.3 Student-centred learning, teaching and assessment		Not applicable	Not applicable	Dimension 2. Teaching development	
	1.4. Student admission, progression, recognition, certification		Not applicable	Not applicable	Not applicable	
	1.5 Teaching staff		Criterion B. Human Resources	Criterion 2. Human Resources	Dimension 1. Planning Dimension 2. Teaching development Dimension 3. Outcomes	
	1.6 Learning resources & student support		Criterion C. Material Resources Criterion D. Economic Resources	Criterion 3. Material Resources Criterion 4. Economic Resources	Not applicable	
	1.7 Information management		Not applicable	Not applicable	Dimension 3. Outcomes	
	1.8 Public information		Not applicable	Not applicable	Dimension 3. Outcomes	
	1.9 On-going monitoring and periodic review of programmes		Not applicable	Not applicable	Dimension 3. Outcomes	
	1.10 Institutions should undergo external quality assurance in line with the ESG on a cyclical basis		(*3)	(*5)	(*7)	
REFERENCE DOCUMENT		(*1)	(*2)	(*4)	(*6)	(*8)

Table 2: Mapping of Part I of the ESG into the external quality assurance procedures of the agency. (Annex I of SAR, p.43-44)

The 2020 ENQA review panel considered each of the procedures under ESG 2.1, and the findings of that review remain valid for all of the procedures except the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure, the PACE-SIGC (IQAS Certification) procedure, and the ALCAEUS Programme certification procedure. The latter three procedures either had not been implemented at the time of the previous review or have been subject to changes in the intervening period. Under ESG 2.1, the focus will be on these three procedures with particular attention paid to ESG 1.3 to consider how student-centred learning, teaching and assessment has been addressed in each of the methodologies, a standard on which the ENQA 2020 review made a recommendation.

As shown in Table I, all Standards from ESG 1.1 to 1.10 are incorporated into ACPUA's evaluation procedures. These standards are drawn from the SAR, documented in various protocols and framework documents available to the panel and confirmed during interviews.

ALCAEUS Programme¹³

DIMENSION	CRITERION	ESG ^{14, 15}
Dimension 1: STRATEGY, PARTNERSHIPS AND ACKNOWLEDGEMENTS	Criterion 1.1: Commitment and strategy of the centre	1.1 Quality Assurance Policy
	Criterion 1.2: Partnerships	
	Criterion 1.3: Internal and external recognitions	
Dimension 2: TRANSPARENCY AND ACCOUNTABILITY	Criterion 2.1: Public reporting	1.8 Public reporting
Dimension 3: INTERNATIONAL QUALITY ASSURANCE SYSTEM	Criterion 3.1: Quality processes and strategy	1.7 Information management
	Criterion 3.2: Staff responsible for the Internal Quality Assurance System	1.9 Ongoing monitoring and periodic evaluation of programmes
Dimension 4: TEACHING	Criterion 4.1: Teaching strategy	1.2 Design and approval of programmes
	Criterion 4.2: Student centred learning. Learning outcomes	1.3 Student-centred teaching, learning and assessment
Dimension 5: STAFF	Criterion 5.1: Responsible for training provision	1.5 Teaching staff
	Criterion 5.2: Teaching staff	
	Criterion 5.3: Administration and service staff	
Dimension 6: FINANCING AND RESOURCES	Criterion 6.1: Internal and/or external funding	1.6 Resources for learning and support of students
	Criterion 6.2: Resources	

Table 3: Mapping ESG compliance Part I ALCAEUS Programme (See SAR p.17-18)

¹³ <https://acpua.aragon.es/en/acpua-certification-programme-2030-alcaeus>

¹⁴ ESG "1.4. Student admission, progression, recognition, and certification" is not evaluated in this programme. This criterion is addressed during the institutional accreditation process, which is a prerequisite for submitting this programme for evaluation.

¹⁵ ESG "1.10 Institutions should undergo external quality assurance in line with the ESG on a cyclical basis" is considered in this programme, as obtaining the programme certification entails its renewal every six years.

Institutional Accreditation Renewal (Institutional Follow-up Accreditation)¹⁶

DIMENSION	CRITERION	ESG ¹⁷
Dimension 0: CURRENT IQAS SITUATION	Criterion 0.1: IQAS management	1.1 Quality assurance policy
	Criterion 0.2: IQAS review and improvement	1.1 Quality assurance policy
Dimension 1: STRATEGIC PLANNING	Criterion 1.1: Strategic planning	1.1 Quality assurance policy
Dimension 2: DESIGN AND EVOLUTION OF TRAINING OFFERING	Criterion 2.1: Evolution of training provision	1.2 Programme design and approval
	Criterion 2.2: Design, review and update of training programmes	1.2 Programme design and approval 1.9. Continuous monitoring and regular evaluation of programmes
Dimension 3: DEVELOPMENT OF TRAINING PROGRAMMES	Criterion 3.1: Pre-information, admission and enrolment processes	1.4 Admission, development, recognition and certification of learners 1.8 Public information
	Criterion 3.2: Student orientation	1.3 Learner-centred teaching, learning and assessment
	Criterion 3.3: Implementation of teaching, learning and assessment strategies	1.3 Learner-centred teaching, learning and assessment
Dimension 4: STAFF MANAGEMENT AND DEVELOPMENT	Criterion 4.1: Academic staff management	1.5 Teaching staff
	Criterion 4.2: Management of teaching support staff	1.6 Learning resources and support for learners
Dimension 5: MANAGEMENT OF RESOURCES AND SERVICES	Criterion 5.1: Management of resources and services	1.6 Learning resources and support for learners
Dimension 6: INFORMATION	Criterion 6.1: Collection of generated information	1.7 Information management

¹⁶ https://acpua.aragon.es/sites/default/files/250131_institutional_accreditation_renewal_en.pdf (English)

¹⁷ The standard "1.10 Institutions should undergo external quality assurance in line with the ESG on a cyclical basis" is considered in this programme, as obtaining the programme certification entails its renewal every six years.

DIMENSION	CRITERION	ESG ¹⁷
MANAGEMENT		
Dimension 7: TRANSPARENCY AND PUBLIC INFORMATION	Criterion 7.1: Transparency, dissemination of activities and programmes and results	1.8 Public information
Dimension 8: R&D&I AND KNOWLEDGE TRANSFER	Criterion 8.1: R&D&I and knowledge transfer	All

Table 4: ESG compliance Part I Institutional Accreditation Renewal programme (See SAR p.18)

PACE-SIGC (IQAS Certification)¹⁸

DIMENSION	CRITERION	ESG ¹⁹
Dimension 1: QUALITY POLICY AND OBJECTIVES	Criterion 1.1: Establishing a quality culture	1.1 Quality assurance policy
Dimension 2: MANAGEMENT OF PROGRAMME DESIGN	Criterion 2.1: Quality assurance of training programmes	1.2 Programme design and approval
		1.9. Ongoing monitoring and regular evaluation of programmes
Dimension 3: DELIVERY OF TRAINING PROGRAMMES	Criterion 3.1: Orientation of its teaching to the student body	1.4 Admission, development, recognition and certification of students
		1.3 Student-centred teaching, learning and evaluation
Dimension 4: ASSURANCE AND IMPROVEMENT OF ACADEMIC AND TEACHING SUPPORT STAFF	Criterion 4.1: Assurance and enhancement of its academic and teaching support staff	1.5 Teaching staff
Dimension 5: ASSURANCE AND IMPROVEMENT OF MATERIAL RESOURCES AND SERVICES	Criterion 5.1: Guarantee and improvement of material resources and services	1.6 Resources for learning and student support
Dimension 6:	Criterion 6.1: Compilation of	1.7 Information management

¹⁸ https://acpua.aragon.es/sites/default/files/250526_prog_pace_doc_marc_en.v4.1.pdf (English)

¹⁹ The standard "1.10 Institutions should undergo external quality assurance in line with the ESG on a cyclical basis" is considered in this programme, as obtaining the programme certification entails its renewal every six years.

OUTCOMES. INFORMATION MANAGEMENT		the information generated	
		Criterion 6.2: Analysis of information and results	1.7 Information management
		Criterion 6.3: Decision-making	1.7 Information management
Dimension 7: TRANSPARENCY, DISSEMINATION OF ACTIVITIES AND PROGRAMMES AND RESULTS		Criterion 7.1: Transparency, dissemination of activities and programmes and results	1.8 Public information
Dimension 8: R&D&I AND KNOWLEDGE TRANSFER		Criterion 8.1: R&D&I and knowledge transfer	All

Table 5: ESG compliance Part I PACE-SIGC (IQAS Certification) programme ((See SAR p.18-19)

Analysis

Based on the available evidence, the panel acknowledges that the agency makes appropriate reference to ESG Part I in its procedures.

In examining how the three procedures, namely PACE-SIGC (IQAS Certification), the ALCAEUS Programme and the Institutional Accreditation Renewal (Institutional Follow-up), address ESG 2.1, the panel confirms that the approved framework documents and protocols cover all elements of ESG Part I.

In particular, the review panel examined how ESG 1.3, “Student-centred learning, teaching and assessment”, was addressed in these protocols. Following discussions at the site visit, the panel was satisfied that ACPUA provides appropriate guidance and that its expert panels receive adequate training. Overall, it was evident that the procedures and protocols had been developed in compliance with legal requirements, as well as with the ESG. Detailed protocols and procedures are clearly documented and readily available on the ACPUA website, which contains a comprehensive repository of procedures, regulations, and reports/findings from various evaluations.

However, notwithstanding this, the panel noted that the examples provided in the SAR and prioritised during dialogue with the agency related to student voice, student well-being, and student representation in quality assurance, rather than the requirements of ESG 1.3, which will be considered in ESG 2.2.

ESG 1.1: Policy for quality assurance.

Each of the three institutional evaluation methodologies address internal quality assurance as is documented in the mapping tables above for the ALCAEUS programme, the PACE-SIGC (IQAS Certification) and the Institutional Accreditation Renewal (Institutional Follow-up) processes respectively. The PACE-SIGC (IQAS Certification) procedure has as its explicit objective the certification of internal quality assurance.

For the ALCAEUS programme and the Institutional Accreditation Renewal (Institutional Follow-up) methodologies, the agency requires that the institution applying for either of them has IQAS certification, which includes amongst other things the institution having a policy for quality assurance,

and that it has been developed in compliance with ESG 1.1 including consultation with internal and external stakeholders. All protocols provide detailed descriptions of each criterion. They describe the evidence that institutions must provide to demonstrate their compliance.

ESG 1.2: Design and approval of programmes.

All of the three institutional evaluation methodologies - the PACE-SIGC (IQAS Certification), the ALCAEUS Programme, and the Institutional Accreditation Renewal (Institutional Follow-up) - require institutions to address ESG 1.2. For instance, this is explicitly provided for in the PACE-SIGC (IQAS Certification) procedure where ESG 1.2 Design and Approval of Programmes is addressed under Dimension 2: “Management of Programme Design”. Within this dimension, criteria are set for HEIs that require them to have procedures for the design, approval, modification and withdrawal of programmes; centres must demonstrate defined responsibilities and decision-making structures, and evidence must be provided that programme proposals follow established internal processes. Additionally, the process establishes criteria that require programmes to define objectives and intended learning outcomes, monitor outcomes, and use results for improvement. Dimension 2 also addresses requirement relating to qualification standards. The criterion relating to programme design documentation requires programmes to comply with national regulations, centres must demonstrate that official degrees comply with national legislation and that the qualification level corresponds to recognised frameworks (e.g. the EHEA framework).

The other two procedures the ALCAEUS Programme and Institutional Accreditation Renewal (Institutional Follow-up), incorporate compliance with ESG 1.2 by requiring that a centre or HEI must already have acquired PACE-SIGC (IQAS Certification) in order to apply for these processes. As described here, this addresses ESG 1.2.

ESG 1.3: Student-centred learning, teaching and assessment.

The SAR states that ACPUA has placed a special emphasis on addressing the recommendation of the 2020 Review that the agency develop a coherent approach to more explicitly addressing student-centred learning, teaching and assessment in its evaluation methodologies, paying special attention to these issues in its training for reviewers by revising procedures where needed. The work undertaken to ensure a clearer focus on student-centred learning, teaching and assessment was described in detail in the 2023 Follow-Up Report to the ENQA review. That report confirmed, and the 2025 site visit reaffirmed, that student-centred learning, teaching and assessment is addressed in all training for experts participating in an evaluation panel.

To strengthen this aspect, an additional criterion was adopted in the ALCAEUS Programme procedure: “4.2 Student centred learning. Learning outcomes”, focusing on how schools/centres ensure student-centred learning and learning outcomes in relation to the 2030 Agenda are embedded within their institutional and programme methodologies. The ALCAEUS Programme protocol provides guidance to panels and institutions/schools/centres on areas such as teaching methodologies, assessment activities, and the involvement of students in providing feedback on the learning process.²⁰ The evaluation procedure includes consulting teachers and faculty on their knowledge of, and implementation of, student-centred learning.

Both the Institutional Accreditation Renewal (Institutional Follow-up) and the PACE-SIGC (IQAS Certification) include criteria that explicitly address student-centred learning, teaching and assessment. Criterion 3.1 of the PACE-SIGC (IQAS Certification) framework document, which relates to the orientation of teaching towards the student body, states that “the institution has

²⁰ See page 13 of

https://acpua.aragon.es/sites/default/files/220624_alcaeus_protocol.pdf#page=12&zoom=100,102,672

defined procedures that promote student-centred learning”. These procedures must take into account the diversity of entry profiles and be based on the use of teaching methods and methodologies, tutorial action plans, assessment systems and other resources that help students to achieve the learning outcomes expected in the degree. In the Institutional Accreditation Renewal (Institutional Follow-up) protocol, Dimension 3 includes a section on the implementation of teaching, learning and assessment strategies. Among other requirements it stipulates that teaching, learning and assessment methodologies must be periodically reviewed to ensure their continued relevance to the intended learning outcomes and the needs of the student body. It further states that any necessary improvements must be implemented. Student satisfaction and degree outcome indicators are considered in the review.

ESG 1.4: Student admission, progression, recognition and certification.

Each of the three new or changed protocols since the 2020 review address ESG 1.4, as stated in the SAR and confirmed during the site visit. The PACE-SIGC (IQAS certification) reviews procedures for admission, progression and graduation. It provides guidelines on the collection of student data and how this can be used to improve the learner experience. For instance, PACE-SIGC (IQAS certification) criterion 6.1 requires that the faculty has mechanisms in place that enable it to continuously collect information on learning outcomes, job placement and the satisfaction of the different stakeholders, as well as other relevant information for decision-making in terms of both degree enhancement and non-academic aspects linked to such enhancement.

The Institutional Accreditation Renewal (Institutional Follow-up) procedure requires IQAS certification and that the HEI also meet associated criteria which cover ESG 1.4. The framework document describing this procedure explicitly establishes requirements around the delivery of training and education programmes. These include information provision prior to enrolment, entry standards and credit recognition. The ALCAEUS Programme does not explicitly address the ESG 1.4, in a narrow sense. However, compliance with this standard is ensured through the fact that institutions cannot apply for the programme unless they have PACE-SIGC (IQAS Certification), which requires compliance with this standard.

ESG 1.5: Teaching staff.

The PACE-SIGC (IQAS certification) framework document sets out the criteria for HEIs and provides guidance on securing and improving its academic and teaching support personnel in its Dimension 4. Areas covered include ensuring an adequate number of competent teaching staff and their ongoing development. The standards/dimensions indicate that staff must be evaluated periodically and systematically, and that the results of activities must be published. The guidance provided gives due regard to academic freedom. HEIs applying for the ALCAEUS Programme will already have addressed this standard through the PACE-SIGC (IQAS certification), but additional requirements have been indicated to ensure that staff are sufficiently competent in the SDG context and are supported with training and development opportunities as described in criterion 5.2 “Teachers”. Similarly, the Institutional Accreditation Renewal (Institutional Follow-up) procedure supplements the PACE-SIGC (IQAS certification) requirements by providing guidance in Dimension 4, criterion 4.1 on types of competencies required, such as dual teaching, Agenda 2030 matters, distance learning, and attention to diversity on academic staff management.

ESG 1.6: Learning resources and student support.

The PACE-SIGC (IQAS Certification) addresses standards for student experience in Dimensions 3 and 5: the delivery of training programmes; and securing and improving material resources and services, respectively. The guidance indicates that HEIs must have the resources to assist students achieve the intended learning outcomes of their study programmes. This is comprehensively

addressed between the two sections. Additionally, the protocol of the ALCAEUS Programme supplements this in standard I.6 by specifying the particular resource requirements pertaining to the ALCAEUS Programme. For instance, Dimension 6 focuses on 'Funding and Resources', specifically in relation to SDG matters. The Institutional Accreditation Renewal (Institutional Follow-up) framework document also has a dedicated section on the management of resources and services (Dimension 5), focusing on the needs of learners and the effective provision of the degree programmes.

ESG I.7: Information management.

The PACE-SIGC (IQAS Certification) protocol clearly addresses this standard in Dimension 6, "Results Information Management". It provides details on what to collect, how to analyse it, and how to use the out-puts to inform decision-making. The ALCAEUS Programme protocol adds the specific requirement to establish compliance with the SDGs, stipulating that the information be used to improve future implementation in Dimension 3. In the Institutional Accreditation Renewal (Institutional Follow-up), the collection and analysis of relevant data to improve programmes and the learner experience is established as a requirement across several dimensions and their respective criteria. For example, this is the case in Dimension 3, which addresses standards for programme delivery, and Dimension 8, which focuses on research, development and knowledge transfer.

ESG I.8: Public information.

With regard to ESG I.8, the PACE-SIGC (IQAS Certification) protocol sets out requirements for HEIs to address this standard. Dimension 7 covers transparency and the dissemination of information on activities, programmes, and results. It provides guidance on the types of information to be provided, where it could be provided, and how compliance can be evidenced. The ALCAEUS Programme protocol supplements this with a section (Dimension 2 and criterion 2.1) on the provision of public information. It clearly stipulates that information on the implementation of the SDGs must be provided, and that this information must be accessible at the various locations where it is disseminated. In the Institutional Accreditation Renewal (Institutional Follow-up) framework document, transparency and public information standards are addressed in Dimension 7. Detailed guidance is provided on a wide range of information types, such as mobility programmes, teaching, learning and assessment methodologies, stakeholder satisfaction results, learning outcomes, and the results of evaluations.

ESG I.9: Ongoing monitoring and periodic review of programmes.

Examining the PACE-SIGC (IQAS Certification) protocol, it is clear that it sets out the criteria and standards HEIs must meet in order to comply with ESG I.9. Dimensions 1 and 2 describe a quality culture and the quality assurance of programmes, fully encompassing monitoring and review practices, as well as how their outputs can contribute to continuous improvement. The protocol of the ALCAEUS Programme describes good monitoring and review practices across several dimensions, such as Dimension 1 (strategy, partnerships and recognition) and Dimension 3 (internal quality assurance processes). However, ESG I.9 relates to study programmes, whereas the ALCAEUS Programme is an institutional certification not a programme certification. Programme requirements are addressed by requiring HEIs to have PACE-SIGC (IQAS Certification) prior to applying for ALCAEUS Programme. In the Institutional Accreditation Renewal (Institutional Follow-up) framework document, the requirements around monitoring and review are explicitly addressed in Dimension 2, which covers the design and development of programmes. HEIs are aware that this is a necessary practice that must be evidenced to achieve the accreditation renewal.

ESG I.10: Cyclical External Quality Assurance.

The panel confirms that in general all procedures in place are conducted cyclically. However, it was noted that the Institutional Accreditation Renewal (Institutional Follow-up) is in the early stages of implementation between the 2020 review and the current review. Two procedures were completed in 2024 solely on a pilot basis, and the first implementation of the post pilot procedure was ongoing during the time of the on-site visit. Similarly, the ALCAEUS Programme procedure has only been conducted on a pilot basis - once in two centres of the University of Zaragoza in 2021/22.

After reviewing the evidence presented in the SAR and accompanying documents, as well as discussions during the on-site visit, the panel was satisfied that ACPUA takes great care to ensure that all applicable procedures adequately refer to the implementation of ESG Part I.

ACPUA has taken particular care to prudently implement ESG 1.3 in its procedures in accordance with the standard. In the panel's view, the agency has complied with the recommendations of the last review. The panel further notes that the implementation of ESG 1.3 operates at two distinct levels across ACPUA's evaluation portfolio. At programme level (initial programme accreditation, follow-up and renewal), the focus is on curriculum structure, workload, adherence to the curriculum document, and the assessment of learning outcomes. These criteria establish the structural framework within which student-centred learning takes place: active teaching and learning methods, student involvement, and formative, feedback-oriented assessment formats are all required elements. Institutional evaluation procedures, by contrast, address ESG 1.3 at more of a system level. DOCENTIA evaluates teaching planning and the outcomes of teaching activity. PACE-SIGC requires institutions to have defined procedures that promote student-centred learning, taking into account diverse entry profiles and employing teaching methods, tutorial action plans, and assessment systems oriented towards student achievement of learning outcomes. ALCAEUS most directly embeds student-centred learning into its framework through Criterion 4.2, which requires curricula to integrate SDG-related learning outcomes through teaching methodologies that enable student-centred learning, and assessment activities that allow students to provide feedback on their learning process. The distinction reflects the nature of each procedure: programme evaluations establish the explicit criteria for ESG 1.3 compliance, while institutional procedures monitor and verify their implementation and associated enhancements. The review panel was able to triangulate between the dialogue at the site visit, the procedural documents and, through translation services, the Spanish-language reports from programme accreditations and the PACE-SIGC procedure that ESG 1.3 was explicitly addressed in the diverse reviews.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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.

2020 review recommendation: none

Evidence

The EQA activities of ACPUA are undertaken guided by well-defined methodologies, aligned to national guidance and regulations. They are clearly presented on the agency's website, with most documents available in both English and Spanish. Where relevant, each document includes a mapping

table (see above) illustrating how it addresses ESG Part I and any other relevant standards. A key objective of the agency is to further strengthen relationships with stakeholders, for example with social partners, schools and employers, as identified in the SWOT analysis. Building on the recommendations made in the previous ENQA review also regarding the development of this area, ACPUA has sought new ways to integrate all stakeholders in the development of its evaluation methodologies. For example, improvements were sought in the Institutional Accreditation Renewal (Institutional Follow-up) procedure to strengthen the student voice and provide an effective channel for communicating student perspectives. Innovative co-creation work involving students led to the development of the eBox tool, in which students were directly involved in the designing of a methodology to enhance the student voice. ACPUA ran two co-creation workshops with two centres of the University of Zaragoza in which participants were divided into groups of three or four people who discussed key questions that students could be asked during the implementation of an Institutional Accreditation Renewal (Institutional Follow-up) event. The eBox tool was created to enable the collection of additional student feedback, which then forms part of the data used and analysed in the Institutional Accreditation Renewal (Institutional Follow-up) procedure. (This will be discussed further in the section on the area for enhancement starting on page 43.)

When considering the evaluation methodologies that were the focus of the targeted review, the panel noted the experimental nature of the Institutional Accreditation Renewal (Institutional Follow-up) procedures that were carried out during the review period, as well as the pilot of the ALCAEUS Programme. A meta-evaluation and analysis was conducted in respect of the pilot of the Institutional Accreditation Renewal (Institutional Follow-up) which was undertaken in two University of Zaragoza centres. The meta-evaluation involved dialogue with and receiving feedback from panel members, representatives of the evaluated centres, including students, and technical staff involved, and its subsequent analysis. This resulted in changes to the framework document for the procedure, with the aim of harmonising language and approaches. The ALCAEUS Programme was also piloted at two University of Zaragoza centres and the evaluation process as implemented in the two centres was also analysed, drawing on the stakeholders involved. Following the analysis, a revised version of the ALCAEUS Programme protocol was prepared with a number of changes, such as adjusting the weighting of criteria, simplifying several dimensions and documentation requirements, and the introduction of a new self-report model. All of the stakeholders with whom the panel spoke during the on-site visit confirmed ACPUA's commitment to working with institutions and social partners in an authentic and innovative manner to develop and refine procedures. This was demonstrated not least by the meta-evaluations and analysis of the pilot projects. Stakeholders stated that their feedback had been incorporated into the further development of the procedures.

The panel noted that the changes made to the PACE-SIGC (IQAS Certification) protocol were minor in nature and made solely to ensure compliance with the issue of new legislation (Royal Decree 576/2023). No changes were made to the procedure's methodology or principles; however, the scope was expanded to include Doctoral Schools. This resulted in minor revisions to the guidance documents, which were made in collaboration with REACU. As this was not an area of responsibility for ACPUA, it was inappropriate to consult stakeholders on a change of this nature. However, the change was communicated well to stakeholders, and training was provided. The PACE-SIGC (IQAS Certification) protocol has subsequently been implemented with the inclusion of Doctoral Schools.

When examining how ACPUA approaches evaluation design, the review panel observed that REACU develops guidelines, particularly focussed on procedures where certain weaknesses and high complexity have been identified. The agency then translates these guidelines and legislation into internal protocols. It was clarified that REACU does not impose any operational restrictions, allowing the agency to function freely without any obstacles hindering day-to-day work. Nevertheless, it is important that the framework within which REACU operates is developed on a

common and consistent basis. REACU focuses on improving coordination, particularly with regard to the interpretation of national legislation. The aim is to ensure harmonisation in the interpretation of the guidelines, recognising that more unified approaches help to ensure that all procedures are aligned and consistently applied across the network.

Analysis

As mentioned above, the agency's approach to testing and reviewing its evaluation methodologies demonstrates a commitment to ensuring each protocol effectively addresses its objective. The methodologies developed and deployed by ACPUA are generally fit for purpose, although the agency experiences challenges in their implementation.

The panel acknowledged the agency's self-reflection in the SWOT, which recognised that some ACPUA processes have become overly complex. It is recognised that quality assurance agencies must engage in a complex landscape; respond to overlapping pan-European, national and regional requirements, and also ensure that external reviews are cyclical, transparent, fair and legally robust. For a small agency such as ACPUA, reconciling these demands while keeping evaluation models for programmes and institutions straightforward is inherently challenging. Meeting these obligations necessitates detailed procedures, documentation, review cycles and safeguards, all of which can legitimately increase complexity. At the same time, the agency's careful design and implementation of its procedures demonstrates a strong commitment to quality and continuous improvement. However, in a small higher education system, the agency will need to be both vigilant and creative in order to manage the genuine challenge of maintaining the right balance between appropriate rigour and unnecessary complexity. Nevertheless, given the nature of national regulations, legislation and REACU guidelines, the review panel believes that ACPUA may have more scope to simplify its protocols than it has utilised to date.

The panel suggests that when considering how to develop the ALCAEUS Programme and its protocols in the future, or how to embed the eBox innovation in the Institutional Accreditation Renewal (Institutional Follow-up) procedure, or indeed how to develop or revise other procedures, the agency should prioritise simplicity and efficiency. Focusing on the principle of fitness for purpose will help to ensure that innovations promote enhancement and do not duplicate or complicate elements of procedures. It is helpful to constantly revisit the driving principle behind each tool and reflect on whether the objective can be achieved more simply without compromising transparency, fairness or the ability to be consistent.

The review panel noted that the implementation of the updated PACE-SIGC (IQAS Certification) protocol with the inclusion of Doctoral Schools is now standard practice with evaluations being effectively conducted and with reports published on the outcomes.

The review panel commends ACPUA for its dedication to placing students and student perspectives at the centre of its evaluation methodologies. The review panel noted that students are integrated as full members of review panels and that corresponding protocols have been further developed to support this role. Reviewers also receive dedicated training, ensuring a coherent approach that explicitly addresses student-centred learning, teaching and assessment. In particular, the panel recognises the agency staff's integrity and commitment to finding innovative ways to engage with institutions and with students, as evidenced in the ALCAEUS Programme methodology and the extensive work with students co-creating the eBox tool for use in the post pilot Institutional Accreditation Renewal (Institutional Follow-up) procedure. This is a good example of both seeking to enhance the incorporation of the student perspective in evaluations and taking a creative approach to improving and enhancing the methodology itself by involving students into its actual design.

The review panel welcomes the co-creation activities that employed a structured, focus group methodology working with stakeholders, including students. The panel also recognises that these activities provided a forum in which themes and formats could be developed collaboratively, with the potential to strengthen the inclusiveness and evidence base of the process. The panel acknowledges ACPUA's intention to further enhance this approach by engaging in more systematic dialogue with students to ensure the student dimension is visibly integrated and student perspectives are consistently and effectively captured and communicated. However, it is currently still an open question as to how the eBox tool will be implemented in practice and whether it can be effectively integrated into the Institutional Accreditation Renewal (Institutional Follow-up). At the time of the on-site visit, the end-to-end implementation process could not be discussed in detail, as implementation was still in its early stages. Similarly, while the ALCAEUS Programme is an exciting initiative, with an important focus, it is a voluntary procedure which has taken a considerable amount of time to develop, and it is unclear to what extent the tool will be deployed into the future. The panel noted that the thoughtful and positive approach of the agency in considering how the ALCAEUS Programme procedures might be integrated with institutional renewal: it is important to build on the work and innovation already undertaken, and ensure it can deliver as much positive impact as possible. Nevertheless, the review panel further observed that no further applications have been received from HEIs to undergo the ALCAEUS Programme procedure.

Arising from this context where no procedures were implemented other than in a pilot context between the 2020 ERR and this ENQA review, the review panel has reviewed the ALCAEUS Programme and Institutional Accreditation Renewal (Institutional Follow-up) to the extent possible. Due to the small number of evaluations undertaken to date, the panel is unable to make any definitive statements about the progress or effectiveness of these procedures.

A methodology for the approval of joint programmes has not yet been developed, nor did ACPUA take up the suggestion for further improvement received in the previous ENQA review to implement the *European Approach for the Quality Assurance of Joint Programmes*. During the site visit the panel learned that it is now actively under consideration in the context of the development of partnerships by the University of Zaragoza. Inter-institutional partnerships are growing in popularity and offer students interesting learning opportunities, and the SUA should be supported in being ready for these developments. The review panel supports the suggestion for further improvement made in the 2020 report and that ACPUA adopt the *European approach to the Quality Assurance of Joint Programmes* and be ready to support institutions in addressing their requirements under ESG Part I. As the agency is a key stakeholder in the European University Alliance UNITA and that Alliance may develop joint programmes, the agency has the capacity to work with this methodology within the EHEA. This could be either by conducting a procedure in line with the methodology or by recognising a decision taken by a foreign agency on a joint programme.

It is clear to the panel that ACPUA is respected by all the different stakeholders for its role in quality assurance, and that its innovative approach has been very well received. Social issues are addressed as cross-sectional topics through the various evaluation processes, with the social economy forming a theme that is structurally embedded across activities. A people-centred approach is adopted with issues such as recognition of learning and qualifications being given priority. It is very positive that transversal dimensions within the evaluation procedures include the social dimension of higher education, student-centred learning, and a forward-looking (foresight-based) approach in which students are included in all activities.

The review panel further commends ACPUA on the introduction of meta-evaluation as an additional mechanism for analysing the agency's work and drawing lessons for future procedures – it is a useful internal quality enhancement tool.

Panel commendations

1. The review panel commends ACPUA for its dedication to placing students and student perspectives at the centre of its evaluation methodologies.
2. The review panel commends ACPUA on the introduction of meta-evaluation as an additional mechanism for analysing the agency's work and drawing lessons for future procedures – it is a useful internal quality enhancement tool.

Panel suggestions for further improvement

1. The panel suggests that when considering how to develop the ALCAEUS Programme and its protocols in the future, or how to embed the eBox innovation in the Institutional Accreditation Renewal (Institutional Follow-up) procedure, or indeed develop or revise other procedures, the agency should prioritise simplicity and efficiency.
2. The review panel encourages the agency to focus efforts on implementing the European Approach to Quality Assurance of Joint Programmes.

Panel conclusion: compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

2020 ENQA review recommendation: none

Evidence

As documented in the SAR, and discussed during the site visit, all of the ACPUA's evaluation processes, comply with the four steps required in ESG 2.3 to the extent that they are relevant to the particular procedure. The findings of the 2020 Review remain valid for the procedures presented in Table 6, with the exception of PACE-SIGC (IQAS Certification), Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and ALCAEUS Programme which will be considered here.

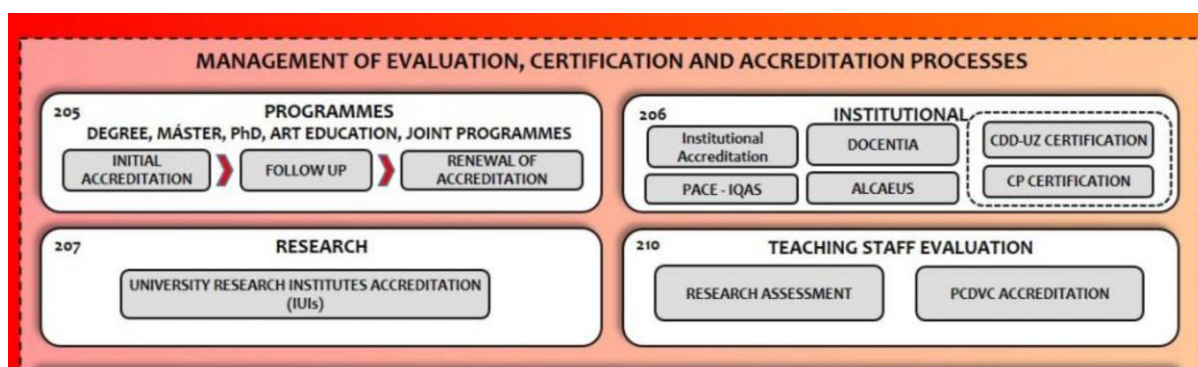


Table 6: ACPUA Management of Evaluation, Certification and Accreditation Processes (See SAR p.15)

The agency also provided information in the SAR on the number and types of evaluation process which were implemented during the review period, as shown in Table 1 on page 15 above. This formed the context for dialogue on the three procedures of particular focus.

Section 3 of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure addresses 'self-assessment or equivalent', section 5.5 'visit to the centre', section 5.6 'proposal for a report' and section 6 'follow-up'. Within the ALCAEUS Programme, section 3 contains detail on the evaluation protocol and covers self-assessment, visit to the centre and the report. Section 5 provides detail on the follow-up procedure. Following the meta-evaluation of the Institutional Accreditation Renewal (Institutional Follow-up) procedure, during which student co-creation workshops were introduced for the first time, the agency changed the self-assessment report template to make it easier for institutions to evidence compliance with evaluation criteria. Sections 4, 6 and 7 of the PACE-SIGC (IQAS Certification) protocol outline the four required elements. During the implementation of each of these processes, the occurrence of each element was attested to by various stakeholder groups with whom the panel met during the site visit. These elements are also documented in the reports, which are published on the agency's website.

Analysis

Focusing on the formal documentation associated with PACE-SIGC (IQAS Certification), Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and ALCAEUS Programme each align fully with all elements of ESG 2.3. They are clearly documented in protocol and guideline documents made available to the panel and which are on ACPUA's website. The four elements - a self-assessment or equivalent, an external assessment normally including a site visit, a report resulting from the external assessment, and a consistent follow-up - form the structure of each of the procedures. As indicated previously there was no significant change to the PACE-SIGC (IQAS Certification), but rather to the scope of programmes encompassed by the procedure. As indicated under ESG 2.2 the review panel confirmed the implementation of the updated PACE-SIGC (IQAS Certification) protocol with evaluations being effectively conducted to include Doctoral Schools and with reports published on the outcomes.

Based on the explanations in the SAR and the additional documentation from the relevant protocols, as well as constructive discussions with ACPUA's staff and the various stakeholders, the panel was able to confirm that all the relevant elements of ESG 2.3 are present in the evaluation procedures. The panel is satisfied that, to the extent that the procedures are being utilised, they are being implemented prudently and in accordance with their standards and criteria. As is stated in Table 1, only two evaluations were implemented in respect of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) protocol, and two in respect of the ALCAEUS Programme; each were treated as pilot implementations of the respective procedures. No subsequent

implementation of the ALCAEUS Programme has taken place. The first post pilot implementation of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) was ongoing during the review.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2020 ENQA Review

The panel found ACPUA fully compliant with Standard 2.4 and commended the agency for involving international experts in all programme reaccreditation reviews.

2021 EQAR Register Committee decision

“As ACPUA is not involving students’ perspective in some of its activities [namely, HEI Initial Accreditations and Partner HEI Evaluations], the Register Committee was unable to concur with the panel’s conclusion, but found the agency to be partially compliant with the standard.”

Evidence

Arising from the 2021 ENQA Review Report, the EQAR Register Committee found ACPUA to be partially compliant with ESG 2.4 due to the absence of student participation in two specific procedures, the Higher Education Institutions Initial Accreditation Programme, a procedure which relates to the (approval of a new faculty/school/unit within a university, and also the procedure for Partner HEI evaluations. All other procedures were found compliant, and the findings of the 2020 Review remain valid for them with the exception of the new or changed procedures, ALCAEUS Programme, Institutional Accreditation Renewal (Institutional Follow-up Accreditation), and PACE-SIGC (IQAS Certification) which will be addressed below.

The EQAR Registration Committee took the view that students should be involved in a process in which their voice is important. Consequently, in January 2024, the CECA of ACPUA decided that evaluation panels for the Higher Education Institutions Initial Accreditation Programme would include a student representative as a panel member, and this is documented in the relevant procedure. The agency specified the student participant should be a PhD student, to ensure that the nominee has the competence to contribute to the procedure. The procedure is a document-based evaluation (desk-based), conducted ex-ante by an expert panel, which reviews the HEI submission against regulatory and quality criteria. The second procedure, the Partner HEI evaluation is undertaken on an ad hoc basis by ACPUA, and similar to all other evaluations where ad hoc panels are established, a student representative is included as a panel member.

In the SAR and during the site visit, ACPUA outlined its approach to forming expert panels. It provided documentation detailing the eligibility criteria for panel members, training arrangements, ethical requirements and the roles of each member, including students. It also supplied sample panel compositions for each of the procedures under review: ALCAEUS Programme, Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and PACE-SIGC (IQAS Certification).

ACPUA has a “Selection, Training and Principles for Evaluators” document that applies to all panels. Selected experts must follow the requirements set out in that document. Experts are required to sign the Agency’s Code of Ethics, which includes clauses on avoiding conflicts of interest. Panel proposals are sent to universities beforehand, typically ten days in advance, and universities may object to specific experts for reasonable, specified reasons. Training is provided to the panellists, for example focussed seminars on skills development. The CECA defines and approves composition norms and ensures adherence to the selection policy in the case of all panels. The CECA also proposes specific panel members for the ALCAEUS Programme, Institutional Accreditation Renewal (Institutional Follow-up Accreditation), and PACE-SIGC (IQAS Certification) evaluation procedures to the Director of ACPUA who formally appoints the members.

Under the PACE-SIGC (IQAS Certification) programme framework, panels are composed of two academics (one of whom acts as chair), one professional, one student, and international membership, when possible, is also encouraged. The composition is designed to ensure a balanced evaluation of the centre’s internal quality system, bringing academic insight, external professional perspectives, and the student voice to the panel.

The Institutional Accreditation Renewal (Institutional Follow-up Accreditation) explicitly sets out how panels are composed. Members are two academics from relevant fields, one expert in quality assurance systems, one professional (external stakeholder) and one student. Whenever possible, one of the panel members will be an international expert. The composition is designed to cover academic knowledge, quality assurance expertise, professional/sector perspective, and the student viewpoint in line with ESG 2.4 requirements. International participation is viewed as helping to support impartiality and broader benchmarking.

With regard to the ALCAEUS Programme, the panel must be composed of one academic/researcher, one student or early career researcher, one professional or stakeholder, and experts in SDGs/sustainability. Expert panel members for the ALCAEUS Programme are selected for their expertise in sustainable development and SDG implementation, as well as having traditional quality assurance evaluation experience. Using experts with diverse profiles ensures a holistic assessment of institutional SDG engagement. ACPUA runs training webinars specifically for ALCAEUS Programme reviewers due to the specialised nature of the evaluation. However, webinars and on-line-sessions are also used for general panel preparation.

During the site visit, the review panel confirmed with academics, social partners and students who have participated in various panels that training was provided and that effective communications were in place with the agency. Seminars and panel briefings are available on the website, along with presentations and recordings. There is an open access model in which individuals can self-register on the agency portal if they meet the specific evaluation requirements. In 2024, the database and associated portal were updated to enhance security, ease of use, and the capture of relevant data.

The review panel noted that ACPUA is committed to an approach in which panels and agency decision-making committees include international members as a norm.

Analysis

The review panel found that the SAR contained a comprehensive suite of protocols and guidance documents regarding ESG 2.4, which are also available on the website.

The review panel noted that the external assessment, undertaken by panels of experts, is fully underpinned by principles of externality and competence. The Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and the PACE-SIGC (IQAS Certification) both require most members to come from outside Aragón and, where possible, one of the panel members will be an international expert. Expert panel members for the ALCAEUS Programme are selected for their

expertise in sustainable development and SDG implementation as well as being experienced in quality assurance.

While training is given and affirmed to be helpful by panel participants, there may be merit in enhancing its depth and focus. For example, the example panels shared in the SAR for the respective evaluations, Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and PACE-SIGC (IQAS Certification) evaluations included individuals who were also part of agency decision-making committees. These committees include the SEC, which addresses institutional matters, and the SET, which addresses programmes. The SEC's primary remit is to oversee the procedures for certifying internal quality assurance systems at faculties and university schools, as well as institutional accreditation and accreditation renewal procedures. The committee comprises academic, professional, student and international experts, all of whom are drawn from outside of the SUA.

The agency explained that, to ensure the first experience of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure was standard-setting for future evaluation processes, they assigned senior experts to the panels who were also directly involved in the agency's decision-making process. This would allow the SEC to be confident that the procedure was well implemented. During the site visit, the agency staff explained that this reflected the pilot approach to the procedure's first-time implementation.

The panel understands the motivation behind this approach, particularly when implementing a particular procedure for the first time. However, continuing this practice could undermine the perceived independence of decision-taking: one person would be present at several levels of influence within a single procedure, both contributing to a recommendation as a panel member and then sitting on the committee that considers and decides upon that recommendation. This dual role may limit the freedom of other panel members or committee members to make, review, question or decide upon recommendations. While the review panel is fully satisfied that there was no lack of actual independence in the cases observed, there is a reputational risk that external parties without full knowledge of the context could perceive there to be undue influence. The panel therefore recommends, separately below, that the agency take structural steps to prevent this situation from arising. In this context, the agency may also wish to strengthen its training and briefing for panel members to ensure that all persons appointed to a panel have the breadth and depth of competence required for the evaluations to which they are assigned.

The review panel notes that quality assurance agencies, including ACPUA, can experience challenges in implementing both the letter and the spirit of the ESG in their respective contexts. The Higher Education Institutions Initial Accreditation procedure is a document-based, ex-ante evaluation conducted by an expert panel that reviews an institution's submission against regulatory and quality criteria; it is not an enhancement-oriented evaluation in which student experience of learning is a primary subject of enquiry. When ACPUA introduced student participation in this procedure, as requested by the EQAR Register Committee, it specified that the student member must be a doctoral student. The panel considers this approach to be well-reasoned: a doctoral student brings both a current student perspective and the academic maturity and research experience appropriate to the nature of a procedure focused on regulatory and quality-criteria compliance. The review panel supports the way the requirement has been implemented. Nevertheless, it encourages the agency to seek opportunities through national and international dialogue to further discuss, analyse and exchange approaches to the appropriate configuration of panels for procedures of this kind, with the aim of identifying solutions that satisfy both the specific contextual requirements of each procedure and the broader ESG, ENQA and EQAR requirements for external quality assurance.

The review panel also noted that the agency approach to working with the respective evaluation panels demonstrates a strong commitment to the human dimension of its work. Team members are

approachable, positive, and supportive, fostering an environment where it is easy to communicate and resolve any issues that arise. The experience is generally constructive, with effective collaboration leading to straightforward solutions and a positive working atmosphere.

Panel recommendations

1. The review panel recommends that the agency protect itself from any person alleging a conflict of interest, or a perceived conflict of interest, in SET or SEC evaluation decisions. Members of the relevant decision-making committee should not participate in an assessment panel whose recommendations will be considered by their own committee. Therefore, it is recommended that any such person should recuse themselves from the subsequent decision-making forum.

Panel suggestions for further improvement

3. The review panel suggests that the agency initiate dialogue with stakeholders, with the aim of reconciling the challenges associated with procedures developed in line with the relevant legal frameworks, while simultaneously addressing compliance with the ESG/ENQA/EQAR requirements for external quality assurance.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements 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.

2020 review recommendation: none

Evidence

Each of three agency evaluation procedures of focus, ALCAEUS Programme, Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and PACE-SIGC (IQAS Certification) have explicit criteria documented. As indicated above, the PACE-SIGC (IQAS Certification) has not changed from the previous review, other than the scope has widened to include Doctoral Schools, the criteria remain unchanged.

Typically, the criteria are complemented with descriptors and guidelines to assist in their implementation as observed by the expert panel when reviewing the SAR and its linked documents, and when considering the other diverse protocols on the agency website. As described in the SAR and further elaborated in during the site visit, the effective and consistent implementation of the criteria is the responsibility of the respective evaluation panels and their members, and subsequently of the agency's technical committees. The elements described in the SAR, and documented in the respective protocols to support this approach, are:

- Published evaluation protocols with detailed assessment criteria.
- Careful selection and appointment of the appropriate persons to review panels, according to criteria.

- Training for all panel members, bespoke to each type of evaluation.
- Preparation of clear reports organised by criteria.
- Evaluation process which includes a final meeting where the expert panel members reach consensus on the findings through the prism of the criteria.
- Review of the findings of the expert panel by the relevant evaluation committee to ensure, amongst other things, the consistent application and interpretation of the evaluation criteria.
- Consideration of the draft report by the relevant university for factual accuracy and procedural alignment with the protocol, which also assists in ensuring consistency in the application of the stated criteria.
- Review by the evaluation panel of any of the responses received leading to the finalisation of the report and its issue by the relevant agency committee – again ensuring a 360° degree consideration of the application of the criteria.
- Appointment of a member of staff from ACPUA to act as coordinating secretary to the process who can act as advisor on the criteria and their consistent application; be a link between the evaluation panel and the relevant evaluation committee; and offer generic insights from other evaluations to assist in maintaining a high level of understanding and consistency.

In the SAR, the agency commented that no appeals or complaints had been received regarding any of the implemented processes, suggesting that procedures are being implemented consistently and fairly. It was noted during the site visit that while there have been no evaluations with a fully negative outcome, there have been evaluations where it was found that specific criteria were not met, thus evidencing that criteria are considered carefully.

In considering the two newly adopted procedures, the review panel also noted the approach of first implementing procedures on a pilot basis, and subsequently undertaking a meta-analysis of the two pilots for Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and the two for ALCAEUS respectively, to ensure that the proposed procedures, including their criteria, are effective.

In meetings with agency staff during the site visit, the panel further noted that regarding the procedure for the accreditation of programmes, the agency does not expect to receive applications for the accreditation of many further degree programmes. Staff explained that they expect that applications for institutional accreditation will increase, and in this context, criteria for such future activities will need to be defined, including for Higher Art Programmes that may be included as university programmes.

Analysis

The review panel found that the documented procedures and the protocols developed by ACPUA are clear, comprehensive and consistent. The approach to their implementation is holistic, incorporating consistency in the written texts as well as expert-led checks and balances to monitor implementation. Deploying a staff member to support each evaluation is standard good practice, as is the methodology for checking and confirming findings, and ensuring alignment of interpretations between participating parties and supporting the achievement of consistency. The findings of the 2020 review in respect of PACE-SIGC (IQAS Certification) remain valid. Given the pilot application of the ALCAEUS Programme at two centres in 2022 (page 12 SAR), it is not possible to comment on consistency in implementation. No post pilot process has been undertaken. Similarly, the first

post pilot implementation of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) was being undertaken during the time of review, and it was not possible to come to a view on how consistently the procedure's criteria are being implemented. Nevertheless, the agency's methodology and governance structure is appropriate to support a fair and consistent approach.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

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.

2020 review recommendation

The panel recommends that ACPUA continue its efforts to ensure that reports in all evaluation processes provide sufficient evidence and analysis to substantiate judgments, and that report writing for the new processes follow best practice.

Evidence

The SAR provided details on how ACPUA considered the recommendation and feedback from the 2020 ENQA review and provided accessible links to reports published on the agency website. During the site visit the panel also had the opportunity to consider the agency website with the agency staff and navigate to the various sections where the materials supporting the agency's work and services are located. The review panel further noted that ACPUA had shared reports with EQAR and that they were published on EQAR's database. The findings from each of the two pilot evaluations undertaken in respect of the new procedures, ALCAEUS Programme (one pilot at two centres) and Institutional Accreditation Renewal (Institutional Follow-up Accreditation) (one pilot at two centres), were available publicly on the ACPUA website. Findings in respect of PACE-SIGC (IQAS Certification) continue to be published as previously, now incorporating Doctoral Schools.

The agency has stated that it has intensified its efforts to ensure the quality, clarity and accessibility of evaluation reports and that it is committed to ensuring that these reports include rigorous analysis and sufficient evidence to provide a sound basis for the judgements made. Templates for the reports for each type of evaluation, as well as tailored training for panel members on the conduct of the evaluation and the completion of the report, are provided. The training addresses how to write clearly and how to integrate evidence-based judgements in respect of each dimension. During the site visit the review panel affirmed with ACPUA staff and stakeholders who participate in panels that the panel members work collectively on report preparation. It was also noted that evaluation teams use Trello, which assists ACPUA in the organisation of diverse review procedures.

In the SAR, it was explained that the structure of the reports has been made uniform to support greater coherence within, and homogeneity across, reports. This was evidenced by the reports published on the agency website. The bespoke guidance provided to the institutions on the completion of the self-assessment report associated with the evaluation, and how the relevant criteria should be interpreted and assessed, was also identified as a way to support a clear and consistent approach in the preparation of post evaluation reports.

It was advised in the SAR and confirmed in meetings at the site visit, both with agency staff and panel members and institutions, that on completion of an evaluation, a draft report is prepared, or as described “a proposal report”, and this is shared with the institution by the SEC for factual verification and observations. If any legitimate queries are raised, the report is amended by the SEC in consultation with the panel to more accurately reflect the situation and/or process.

All three procedures specifically under consideration by the targeted review, the ALCAEUS Programme, the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) and the PACE-SIGC (IQAS Certification) programme have dedicated sections in the associated protocols on report preparation and publication which align with the overarching agency approach.

Analysis

The panel was assured through its review of the documentation, its consideration of the SAR, and the dialogue during the site visit that a consistent and comprehensive approach to the preparation of reports subsequent to specific programme and institutional evaluations is in place across diverse processes and procedures. The panel members work collectively to prepare reports for the relevant committee, ensuring that quality assurance procedures involve the relevant body, the Programmes Evaluation Committee (SET) or the Institutions Evaluation Committee (SEC). The panel noted the use of Trello and agreed that it is a useful tool both for logistical ease and to assist in consensus-building among panel members. It was noted that sometimes discrepancies arise within the panel, and support or guidance on the criteria or procedure is provided by the agency coordinator in this context. The panel was satisfied that the reports record evidence supporting the findings and noted that on completion the report is forwarded to the relevant agency committee, which then determines the next steps. The review panel is advisor to the committee which is the decision-maker on the panel’s recommendations. The review panel members were able to access and confirm that reports from the diverse evaluation types were published, with clear detail on dates and decisions taken including negative decisions, as indicated in the 2020 review.

The use of standard instructions, and the provision of guidance on a shared approach to language and terminology, assists in maintaining consistency across all documentation and reports prepared.

The review panel noted that the ACPUA model, in which an evaluation is followed by a ‘proposal’ report and then a final report, is typical good practice where a draft report is prepared and it undergoes appropriate factual verification checks and process refinement before finalisation, agreement and publication. To enhance visibility of this good practice the description of the process between the review panel, the SEC or SET and the institution respectively could perhaps be streamlined further.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2020 review recommendation: none

Evidence

ACPUA described its complaints and appeals procedures in the SAR. The agency refers to this single governance document by several names across its documentation — including the Complaints and Claims Procedure, the Appeals, Complaints and Appeals Procedure, and the Procedure for Handling Appeals, Complaints and Claims — but these names all refer to one document, which contains distinct and separately described processes for each type of matter. For formal appeals against accreditation decisions, the procedure sets out a legally defined process through the Appeals Committee; this route is available to any institution whose accreditation application results in a formal decision, and it applies equally to all three procedures that are the focus of this review — the Institutional Accreditation Renewal (Institutional Follow-up Accreditation), the ALCAEUS Programme, and the PACE-SIGC (IQAS Certification). For complaints about procedural matters — such as concerns about delays, the conduct of an evaluation, or the application of a criterion — a separate and distinct process applies, including flowcharts that guide institutions through the appropriate steps. The Appeals Committee itself was initially established in 2016 following a decision of the Board of Directors in May 2015, and subsequently restructured in 2020. The information provided in the SAR mapped directly to the information published on the agency's website and to that contained in the formal rules of the committee. The Appeals Committee is ACPUA's technical body responsible for supervising the correct implementation of the agency's evaluation, certification and accreditation procedures and for reviewing all complaints and appeals received. Its membership and functions are prescribed; it includes a student member; and provisions are made to address potential conflicts of interest, with all processes subject to compliance with the agency's Code of Ethics. During the site visit, the panel confirmed that no complaints or appeals had been made in respect of any ACPUA evaluation procedure within the scope of the ESG during the review period. Appeals or queries that did arise related to the evaluation of academics' six-yearly research activity, which is outside the scope of the ESG.

Additionally, the review panel noted that in the SAR, the agency argues that it has implemented preventive safeguards across its various procedures, such as the Code of Ethics, a right to object to panel composition, draft reports incorporating institutional feedback, the use of consensus-based panels operating under a shared set of criteria; and the appointment of a coordinating secretary from ACPUA staff to each panel, who advises on criteria and serves as a link between the panel and the institution throughout the process), which generally help to minimise the likelihood of complaints and appeals. Taken together, these elements embed complaint prevention into the evaluation process itself, rather than relying solely on a post-hoc formal procedure. This approach reflects the agency's broader commitment to building a system of trust with its stakeholders, as evidenced by the absence of formal complaints during the review period.

Analysis

The review panel was satisfied that the documentation provided in the SAR and available on the agency's website was appropriately referenced and clearly understood by the agency and its stakeholders. The formal distinction between appeals — which are legally defined processes tied to formal accreditation decisions — and complaints — which address procedural concerns and are handled through a separate route — is clearly set out in the agency's procedural document and is reflected in the committee's rules. The review panel considers this differentiation to be appropriate and well-designed for the context in which the agency operates.

While acknowledging that the absence of formal appeals or complaints can be a positive indicator of clear criteria, effective implementation and well-embedded preventive safeguards across varied processes, the review panel encourages the agency to ensure that all dialogue on the application of criteria remains open and transparent. Given the relatively small size of the region and the limited number of institutions under review, there is an inherent risk that, over time, a lack of rigour or a degree of familiarity that blurs appropriate boundaries could emerge. Measures such as ACPUA's

established practice of involving international panellists and of appointing panel members from outside the University System of Aragon are effective mitigations of this risk, and the panel encourages the agency to maintain them consistently.

The agency has a professional approach in ensuring that procedures are consistently embedded across all evaluation activities, including new ones. Overall, ACPUA has built a system of trust in its quality assurance process, as evidenced by the fact that the formal complaints and appeals procedure has not been used during the period under review.

Panel conclusion: compliant

ENHANCEMENT AREAS

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

ACPUA is acknowledged by all stakeholders as a mature and trustworthy quality assurance agency, with strong stakeholder relationships operating in a small region of Spain. The agency staff members are evidently deeply committed to the quality of the higher education provision in their region and consistently place the student at the centre in their processes and dialogue. The reason for choosing ESG 2.2 was to ensure effectiveness of its assessment procedures with a specific focus on Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure. The agency wishes to design the most appropriate tools and protocols for each procedure, while focusing on fostering deeper stakeholder engagement, especially with students. It was noted that current ACPUA priorities include simplification, digitalisation and increased efficiency across procedures.

A number of very positive student engagements were described, such as the development of the learner-facing infographic providing information on study options available in the region, and separately the important work undertaken on considering student wellbeing in the wake of the Covid 19 pandemic. The agency's commitment to supporting students and giving authentic recognition to student well-being was very striking. In the context of ESG 2.2 however, the review panel's focus and the dialogue with agency staff centred particularly on the staff-student co-creation workshops and the eBox tool that emerged from them.

In developing the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) protocol, ACPUA considered how best to enhance student engagement with the methodology and how student input could influence the procedural design and the efficacy of the procedure. Accordingly, they ran two co-creation workshops with two university centres, involving 20 students in total; 8 students from both undergraduate and postgraduate programmes at the School of Engineering and Architecture (EINA) and 12 students from the Higher Polytechnic School of Huesca (EPSH), both centres of the University of Zaragoza. Participants were divided into groups of three or four, and two key questions were posed at the workshops:

- What aspects do you think are essential to evaluate your centre?
- What do you think is the best method for students to evaluate their school?

At the end of the workshops, the conclusions were collated and shared with all the stakeholders. Following the co-creation workshops the two university centres that hosted them underwent the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure, with all stakeholders receiving the suggestions shared at the workshops in response to the two questions posed. Subsequent to these evaluations, the agency conducted a meta-evaluation of the experience of convening the co-creation workshops and trying to incorporate the feedback into the process. A full report was prepared, and it is shared on ACPUA's website. A key learning was that while the stakeholders valued the approach, there needed to be a simpler and less onerous model to make the suggested procedural change effective in enhancing student engagement and in enhancing the effectiveness of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure itself. Consequently, a new tool, the eBox, has been incorporated into the standard process.

The eBox involves a dedicated student questionnaire, with questions identified by students themselves, being issued on behalf of ACPUA as an integral part of the Institutional Accreditation Renewal (Institutional Follow-up Accreditation) procedure approximately six weeks before the site visit associated with this type of evaluation. Expert panels will then receive the findings which will be another data point for them when undertaking the procedure. Each university has different needs in

relation to the eBox. The questionnaire was designed with the specific purpose of enabling students to implement changes.

It was being deployed for the first time in an Institutional Accreditation Renewal (Institutional Follow-up Accreditation procedure being undertaken in December 2025, and therefore insights into the end-to-end process were not available to the panel at the time of the site visit. Nevertheless, the review panel were able to discuss the eBox tool both during many of the particular meetings as well as during the dedicated enhancement focussed meeting at the site visit. It was evident to the review panel that the motivation to introduce the tool, and the way in which it was created, was driven by a very commendable and authentic desire to both innovate and enhance student involvement in quality assurance. It was further evident from student feedback during the site visit that the students experienced the process as a positive and valuable exercise and that they were committed to seeing the eBox effectively deployed.

During the dedicated enhancement session, the review panel were impressed by the transparency and openness of the agency staff. As the first deployment was ongoing during the review, some of the questions posed by the panel remain open. The review panel sought to fully understand the more focussed rationale behind the innovation and its fitness for purpose. The precise desired impact of the tool was not yet clear, nor how it fully integrates into the current procedure. For example, institutions routinely collect feedback from students; how is this different; does it truly supplement the procedures; does it really ease the burden on institutions, review panels, the agency; how will it be impactful and not burdensome? The review panel considers the work done to date a very good starting point and excellent use of a model of co-creation. It is suggested that ACPUA treat the model as an experiment for a period of time – testing and checking that it adds value to the procedure, and it is worth the volume of work associated with it.

It is very important that the clear and focussed purpose of the innovation, and its intended impact be identified. The review panel believes that the agency's modelling approach should be more systematic. In addition, the review panel suggests answering and reflecting on the following questions and issues discussed systematically.

- Is the data being collected through the eBox better data, valid data?
- Who is controlling and processing the eBox?
- Are the answers to these questions clearly understood and managed through the digital tools being used?
- Does the model ensure simplicity and effectiveness with an appropriate digital approach?
- Does the timeline work?
- How is the data being analysed?

The review panel in addition suggests that the agency examine how it will be impactful. This will only be possible if more than one procedure has been implemented using the tool. There may be opportunities to gather data, undertake a further meta-evaluation and collaborate with a sociological research group on the intervention. The review panel appreciates the potential and suggests that ACPUA find space and time to consider the possibilities of the process innovation in an open and exploratory manner.

ADDITIONAL OBSERVATIONS

CONTINUOUS UPDATING OF DOCUMENTS

In reviewing documentation (organisational/governance/legal frameworks) received and in the meetings held with ACPUA staff, the review panel observed the agency's efforts and focus on reviewing and aligning documentation to ensure that it fully reflects organisational good practices and the legal framework in place. However, in reviewing the website and shared documentation, and in discussing the governing and regulatory context with the agency staff during the site visit, the panel noted inconsistencies. While both national and regional legislation have been implemented in full by the agency, not all statutes and associated guidelines published on the website have been aligned with current legislation and the ACPUA-implemented good practices. In line with ESG 3.6, and to ensure the quality and integrity of the agency's work, the panel suggests that all relevant documents are updated fully and regularly.

Panel suggestion for further improvement

4. The panel suggests that the suite of published documents should be reviewed and updated to ensure absolute accuracy and clarity, so that there can be no doubt about ACPUA's full adherence to legislation and good practices. This was evidenced in binding documents and meetings with agency staff.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 2.2 Designing methodologies fit for purpose

1. The review panel commends ACPUA for its dedication to placing students and student perspectives at the centre of its evaluation methodologies.
2. The review panel commends ACPUA on the introduction of meta-evaluation as an additional mechanism for analysing the agency's work and drawing lessons for future procedures – it is a useful internal quality enhancement tool.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 2.4 Peer-review experts

1. The review panel recommends that the agency protect itself from any person alleging a conflict of interest, or a perceived conflict of interest, in SET or SEC evaluation decisions. Members of the relevant decision-making committee should not participate in an assessment panel whose recommendations will be considered by their own committee. Therefore, it is recommended that any such person should recuse themselves from the subsequent decision-making forum.

Considering the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, **ACPUA is in compliance with the ESG.**

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 2.2 Designing methodologies fit for purpose

- 1) The panel suggests that when considering how to develop the ALCAEUS Programme and its protocols in the future, or how to embed the eBox innovation in the Institutional Accreditation Renewal (Institutional Follow-up) procedure, or indeed develop or revise other procedures, the agency should prioritise simplicity and efficiency.
- 2) The review panel encourages the agency to focus its efforts on implementing the European Approach to Quality Assurance of Joint Programmes.

ESG 2.4 Peer-review experts

- 3) The review panel suggests that the agency initiate dialogue with stakeholders, with the aim of reconciling the challenges associated with procedures developed in line with the relevant legal frameworks, while simultaneously addressing compliance with the ESG/ENQA/EQAR requirements for external quality assurance.

ESG 3.6 Internal quality assurance and professional conduct

- 4) The panel suggests that the suite of published documents should be reviewed and updated to ensure absolute accuracy and clarity, so that there can be no doubt about ACPUA's full adherence to legislation and good practices. This was evidenced in binding documents and meetings with agency staff.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
3 November 2025 - Online meeting with the agency's resource person			
	10.00-13.00	Review panel's kick-off meeting and preparations for site visit	
1	11.30-12.30	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	Technical staff member, QA Coordinator Technical staff member, QA International
24 November 2025 – Day 0 (pre-visit)			
2	18.15-19.40	Review panel's pre-visit meeting and preparations for day 1	
25 November 2025 – Day 1			
3	08.45-09.30	Review panel's private meeting	
4	09.30-10.00	Pre-visit meeting with ACPUA's Director, and the agency resource person	Director, ACPUA ACPUA's Resource persons
5	10:00-11:00	Meeting with Committee responsible for the Strategic Plan (SP) including advisors to the committee	Director, ACPUA Chair SEC & SP Advisor, U. Salamanca Member CECA & SP Advisor, Doctorate student U. Zaragoza Member CECA & SP Advisor, Spanish Red Cross

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			QA Coordinator, ACPUA QA International, ACPUA
	15 min	Review panel's private discussion	
6	11.15-12.15	Meeting with key staff in charge of external QA activities	Technical staff member, QA Teaching Technical staff member, QA Foresight Technical staff member, QA Coordinator Technical staff member, QA International
	12.30-13.30	Private discussion and lunch	
7	13.30-14.30	Meeting with Board of Directors	General Director of Universities, Government of Aragon General Director of Science & Research, Government of Aragon Member of Committee of Experts, U. Rey Juan Carlos, Madrid Representative of CEOE, Confederation of employers of Aragon President of Social Advisory Board, U. Zaragoza Student representative, U. San Jorge
	15 min	Review panel's private discussion	
8	14.45-15.45	Meeting with staff around ACPUA self-selected enhancement areas	Technical staff member, QA Teaching Technical staff member, QA Foresight

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Technical staff member, QA Coordinator Technical staff member, QA International
	15 min	Review panel's private discussion	
9	16:00-17:00	Meeting with stakeholders, such as employers, students, local community	Stakeholder representative, ACPUA+Society, Defense Delegation in Aragon Stakeholder representative, Training school accreditation, Education, Government of Aragon Stakeholder representative, Third mission, ANVUR Italy Stakeholder representative, INQAAHE, AQU Catalunya Stakeholder representative, REACU, AQUIB Balears
10	17.00-17.45	Wrap-up meeting among panel members and preparations for day 2	
26 November 2025 – Day 2			
	08:45-09:30	Review panel's private meeting	
11	09:30-10:30	Meeting with Student representatives to include at least one coordinator of the co-creation workshops, and at least one person involved in Institutional Accreditation	Student, ALCAEUS Programme, U. Carlos III, Madrid Student, Co-creation workshop, EINA, U. Zaragoza Student, Former Board of Directors & former Student Committee President, U. Zaragoza Student, ACPUA internship, covid impact focus groups

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			at Aragon Universities Student, Student Committee President & eBOX survey participant, U. San Jorge
	15 min	Review panel's private discussion	
12	10.45-11.45	Meeting with ACPUA evaluators/reviewers national and international experts)	National reviewer (professional), PACE-SIGC, CIRCE National reviewer (student), PACE-SIGC, U. Oberta de Catalunya National reviewer (professional), Study Programme initial accreditation & ALCAEUS, AECID National reviewer (academic), Study programme initial accreditation, U. La Rioja International reviewer (professional), PACE-SIGC & Study programme accreditation, EDUPLUS National reviewer (academic), Institutional accreditation renewal, U. Polit�cnica de Valencia
	15 min	Review panel's private discussion	
13	12:00-13:00	Meeting with HEI heads / institutional leadership	Vice-Rector for Academic Policy, U. Zaragoza Dean of Education, U. Zaragoza Director of the School of Engineering and Architecture, U. Zaragoza Vice-Rector for Academic Affairs and Quality Assur-

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			ance, U. San Jorge Dean of Health Science Faculty, U. San Jorge Dean of Communication and Social Science Faculty, U. San Jorge
	13:00-14:00	Lunch (panel only) and review panel's private discussion	
14	14.00-15.00	Meeting with HEI quality assurance officers	Quality and Improvement Area, U. Zaragoza EUPLA, U. Zaragoza CUD, U. Zaragoza Quality Area, U. San Jorge Quality Area, U. San Jorge
	15 min	Review panel's private discussion	
15	15:15-16:15	Meeting with representatives of ACPUA's technical committees (CECA, SEC, SEP, SET – responsible for evaluations and decision-making)	Member SEC, U. Palmas de Gran Canaria Member SEC, Erasmus University, Países Bajos Former member CECA, U. La Rioja Chair SEP, U. Córdoba Chair APPEALS COMMITTEE, expert in law Chair SET, U. Barcelona
	15 min	Review panel's private discussion	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
16	16.30-17.30	Meeting with ministry representatives	General Secretary Employment, Science and Universities, Government of Aragon General Director of Universities, Government of Aragon Aragon Parliament
17	17.30-18.45	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
27 November 2025 – Day 3			
18	09.00-10.00	Meeting among panel members to agree on final issues to clarify	
19	10.00-11.00	Meeting with Director of Agency to clarify any pending issues	Director, ACPUA Technical staff member, QA Coordinator Technical staff member, QA International
20	11.00-12.30	Private meeting between panel members to agree on the main findings	
21	12.30-13.00	Final de-briefing meeting with agency to inform about preliminary findings	Director Technical staff member, QA Teaching Technical staff member, QA Foresight Technical staff member, QA Coordinator Technical staff member, QA International
	13.00-14.00	Lunch & Departure of Review Panel	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Targeted review of Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA) against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between ACPUA (applicant), ENQA (coordinator) and EQAR.

April 2025

1. Background

Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education – ACPUA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2016 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education – ACPUA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2016 and is applying for renewal of ENQA membership.

ACPUA is carrying out the following activities within the scope of the ESG:

- Study programme initial accreditation
- Study programme accreditation
- Study programme follow-up
- Training schools accreditation
- Higher education institutions initial accreditation
- Teaching activity evaluation system audit (DOCENTIA programme)
- Teaching staff evaluation system audit
- Partner HEI evaluation
- PACE-SIGC (IQAS Certification)
- Institutional Accreditation

- Institutional Accreditation Renewal (Institutional Follow-up Accreditation)
- Certification ODS/Agenda 2030 (ALCAEUS Programme)

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG:

- ACPUA Quality Seminars
- University research institutes initial accreditation & accreditation
- Evaluation of research activities
- Junior academic staff research activity evaluation
- Strategic foresight studies / surveys
- Consultancy: support to decision making process

While these activities are not relevant to the application for renewal on EQAR, it is ACPUA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

2. Purpose and scope of the targeted review

This review will evaluate the extent to which ACPUA continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support ACPUA's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

- A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
 - a. ESG 2.4 Peer-review experts
 - Address whether the agency includes student members in all panels of its activities.
- B) Standards 2.1 to 2.7 for the following activities²¹²²:
 - a. Institutional Accreditation Renewal (Institutional Follow-up Accreditation)

²¹ [See Decision on Substantive Change Report from 2025-04-03](#)
²² [See Decision on Substantive Change Report from 2022-09-30](#)

- b. ALCAEUS programme
- c. IQAS Certification (PACE SGIC), covering areas where changes were made and at least the following in detail:
 - ESG 2.2 - whether the standards are fit for the evaluation of the new objectives and how the agency has consulted all relevant stakeholders when updating the methodology;
 - ESG 2.5 - whether the updated standards are consistently implemented
 - ESG 2.6 - if the reports resulting from the ACPUA's updated methodology for Internal Quality Assurance Certification are published.
- C) Standards affected by other types of substantive changes:
 - a. n/a

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 2.2 Designing methodologies fit for purpose

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, ACPUA and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by ACPUA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ACPUA;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;

- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to ACPUA during the past 5 years, and conversely ACPUA has not provided any remunerated or unremunerated services to the coordinator.

3.2 Nomination and appointment of the review team members

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide the agency with the proposed panel composition and the curricula vitae of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, the coordinator will inform EQAR about the appointed panel members.

3.3 Self-assessment by ACPUA, including the preparation of a self-assessment report

ACPUA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);

a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see

- **2.1 Focus areas**);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which ACPUA fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency

publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to ACPUA at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR²³.

²³

See here: <https://www.eqar.eu/assets/uploads/2025/01/EQAR-UseInterpretation-v4.0.pdf>

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If ACPUA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by ACPUA and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to ACPUA the [Declaration of Honour](#) together with the final report.

4. Publication and use of the report

ACPUA will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in (Spring, 2026). The Register Committee's final

judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	April 2025
Appointment of review panel members	May 2025
Self-assessment report (SAR) completed by ACPUA	By 2 June 2025
Screening of SAR by ENQA Review Coordinator	June 2025
Preparation of site visit schedule and indicative timetable	August/September 2025
Briefing of review panel members	September/October 2025
Review panel site visit	November 2025
Submission of the draft review report to ENQA Review Coordinator	January 2026
Factual check of the review report by the ACPUA	February 2026
Statement of ACPUA to review panel (if applicable)	February 2026
Submission of review report to ENQA	February/March 2026
Validation of the review report by the Agency Review Committee	April 2026
EQAR Register Committee meeting and decision on the	Summer 2026

application by ACPUA	
Decision on ENQA membership by the ENQA Board	September 2026

ANNEX 3: GLOSSARY

ACPUA: Aragon Agency of Quality Assurance and Strategic Foresight in Higher Education.
ANVUR: Italian Quality Assurance University Agency.
CECA: Commission of Evaluation, Certification and Accreditation.
CER: Evaluation Committees by field of knowledge.
DEQAR: Database of External Quality Assurance Reports.
EHEA: European Higher Education Area.
EINA: School of Engineering and Architecture, University of Zaragoza
ENQA: European Association for Quality Assurance in Higher Education.
EQA: External Quality Assurance.
EQAF: European Quality Assurance Forum.
EQAR: European Quality Assurance Register for Higher Education.
EPSH: Higher Polytechnic School of Huesca, University of Zaragoza.
ESG: Standards and Guidelines for Quality Assurance in the European Higher Education Area
HESI: Higher Education Sustainability Initiative.
IQAS: Internal Quality Assurance System.
INQAAHE: International Network for Quality Assurance Agencies in Higher Education.
SDGs: UN Sustainability Development Goals.
QA: Quality assurance.
REACU: Spanish Network of Higher Education QA Agencies.
SAR: Self-Assessment Report.
SEC: Institutions Evaluation Committee.
SEI: Research Evaluation Committee.
SEP: Faculty Evaluation Committee.
SETE: Thematic Evaluation Committee.
SET: Programmes Evaluation Committee.
SUA: University System of Aragon.
ToR: Terms of Reference.
UNITA: Universitas Montium, European University Alliance
UNIZAR: University of Zaragoza.
USJ: University San Jorge.

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ACPUA JOINTLY WITH THE SAR VIA WEBLINKS

- Organic Law 6/2001 on universities
- Organic Law 2/2023 on the university system
- Royal Decree 822/2021
- Royal Decree 640/2021
- Royal Decree 576/2023
- the Strategic Plan
- the Technical Committees and their membership
- the Code of Ethics
- Appeals Committee rules
- online webinars organised by the Agency
- Substantive change reports provided to EQAR
 - 2022 09 30
 - 2025 04 03
 - 2025 09 30
- EQAR Renewal Letter – 2022 10 21
- EQAR Renewal Decision – 2021 10 15
- EQAR 2024 Note - Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies
- protocols and report templates for the evaluation procedures of the agency namely,
 - Study programme initial accreditation
 - Study programme accreditation
 - Study programme follow-up
 - Training schools accreditation
 - Higher education institutions initial accreditation
 - Teaching activity evaluation system audit (DOCENTIA programme)
 - Teaching staff evaluation system audit
 - Partner HEI evaluation
 - PACE-SIGC (IQAS Certification)
 - Institutional Accreditation
 - Institutional Accreditation Renewal (Institutional Follow-up Accreditation)
 - Certification ODS/Agenda 2030 (ALCAEUS Programme)

ADDITIONAL EVIDENCE REQUESTED BEFORE AND DURING THE VISIT

- Note on ACPUA Regulation

ENQA TARGETED REVIEW 2026

THIS REPORT presents findings of the ENQA Targeted Review of the Aragon Agency for Quality Assurance and Strategic Foresight in Higher Education (ACPUA), undertaken in 2025.