



European Association for
Quality Assurance in Higher Education

Prime Minister Denis Shmygal
Cabinet of Ministers of Ukraine
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01008 Kyiv
Ukraine

Chair of the Verhovna Rada, Dmytro Razumkov
Verhovna Rada of Ukraine
5 Hrushevskoho Str.
01008 Kyiv
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29 September 2020

Dear Prime Minister
Dear Chair of the Verhovna Rada

I am writing on behalf of the European Association for Quality Assurance in Higher Education (ENQA) with regards to the proposed changes to Ukraine's national higher education legislation and the potential impact on the National Agency for Higher Education Quality Assurance (NAQA) and related consequences for Ukraine's integration into the European Higher Education Area (EHEA).

It has been brought to our attention that the Ukrainian government is considering transferring responsibility for external quality assurance to a central executive governmental body. Concerns have been raised with us that this could affect the status of staff and stakeholders involved in external quality assurance and have consequences for the independence of the body responsible for external quality assurance.

In light of this, we would like to draw your attention to the commitments that Ukraine has made through being a member of the EHEA, one of which is aligning the national quality assurance framework with the Standards and Guidelines for Quality Assurance in the EHEA (ESG). One of the key standards of the ESG is the independence of quality assurance agencies (Standard 3.3). This covers organisational independence, operational independence, and independence of formal outcomes. It serves to ensure that quality assurance agencies are able to govern and manage their activities independently and that external quality assurance is conducted free from undue influence from third parties, including national authorities.



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The independence of an external quality assurance agency and alignment of its activities with the ESG is therefore of importance not only for the fundamental goal of enhancing the quality of higher education in Ukraine, but also in the context of Ukraine's participation in the EHEA and implementing the EU-Ukraine Association Agreement in the area of higher education reform.

We therefore ask you to take alignment with the requirements of the ESG into account when considering any changes to laws related to higher education and quality assurance.

NAQA has been an Affiliate of ENQA since June 2020 and has been actively involved in our activities since then. NAQA has also indicated their plans to become a Member of ENQA, which will require them to demonstrate their compliance with the ESG through an external review of the agency. ENQA strives to support its affiliates in working towards ENQA membership and we hope that the Ukrainian legal framework will make it possible for NAQA to achieve compliance with the ESG.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Grolimund', with a long horizontal stroke at the end.

Christoph Grolimund
ENQA President