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Doc. 300.1.2

Higher Education Institution's Response

Date: 01/06/2021

- **Higher Education Institutions:**
Hellenic Open University (Greece) and Frederick University (Cyprus)
- **Town:** Nicosia
- **Schools:**
Social Sciences (Hellenic Open University)
Business and Law (Frederick University)
- **Department:** Law (Frederick University)
- **Programme(s) of study under evaluation**
Name (Duration, ECTS, Cycle)

Programme

In Greek:

Ευρωπαϊκό Δίκαιο (3 ακαδημαϊκά εξάμηνα, 90 ECTS, Μάστερ (LLM), Εξ αποστάσεως, Διαπανεπιστημιακό με το Ελληνικό Ανοικτό Πανεπιστήμιο (ΕΑΠ))

In English:

European Law (3 academic semesters, 90 ECTS, Master (LLM), Distance Learning, Joint with Hellenic Open University)

Language(s) of instruction: Greek

Programme's Status: New



The present document has been prepared within the framework of the authority and competencies of the Cyprus Agency of Quality Assurance and Accreditation in Higher Education, according to the provisions of the “Quality Assurance and Accreditation of Higher Education and the Establishment and Operation of an Agency on Related Matters Laws of 2015 to 2019” [N. 136 (I)/2015 to N. 35(I)/2019].

A. Guidelines on content and structure of the report

- *The Higher Education Institution (HEI) based on the External Evaluation Committee's (EEC's) evaluation report (Doc.300.3.1) must justify whether actions have been taken in improving the quality of the department in each assessment area.*
- *In particular, under each assessment area, the HEI must respond on, without changing the format of the report:*
 - *the findings, strengths, areas of improvement and recommendations of the EEC*
 - *the deficiencies noted under the quality indicators (criteria)*
 - *the conclusions and final remarks noted by the EEC*
- *The HEI's response must follow below the EEC's comments, which must be copied from the external evaluation report (Doc. 300.3.1).*
- *In case of annexes, those should be attached and sent on a separate document.*

1. Study programme and study programme's design and development (ESG 1.1, 1.2, 1.7, 1.8, 1.9)

Areas of improvement and recommendations

- 1.1 The External Evaluation Committee recommended the publication of a Student Handbook for Postgraduate Studies which would provide information about all masters and PhD programmes provided by Frederick University as well as the services and resources, including scholarships, which are available to them.
- 1.2 Evidently, a study guide on the joint LLM in European Law will be compiled in due course.

Institutions' Response:

- 1.1 Frederick University has a student handbook for Postgraduate Studies as well as a regulation for PhD Studies, which are posted on the University's Website ([Link](#)). Please refer to Annex 1.
- 1.2 As per the recommendations of the External Evaluation committee, a draft study guide has been developed for the programme "LLM in European Law". Please refer to **Annex 02**. Once the CYQAA approves the delivery of the program, the handbook will become available in the websites of both institutions.

2. Student – centred learning, teaching and assessment (ESG 1.3)

Areas of improvement and recommendations

- 2.1 Collaboration amongst students is mainly centred on online synchronous meetings. In this respect, the incorporation of gamification techniques would be very useful to promote the use of formative assessment activities or to create role activities that simulate real situations.
- 2.2 The resources that appear in the learning guides are mainly textual. Textual materials are the base materials in distance learning and multimedia resources may improve the performance, understanding and engagement of students according to literature. Therefore, it would be advisable to include more multimedia materials

taking into account accessibility recommendations (short length, subtitled, with non-textual information and so on).

- 2.3 The length of units (10 ECTS) is a little longer than that normally desirable in a distance learning context. As distance learning students have to manage to cope with family, work and studies, more flexibility would be desirable in order to avert failure due to unpredictable events. The External Evaluation Committee would recommend the provision of more flexibility in the delivery of activities.
- 2.4 Student interaction and performance is monitored, but the process could be improved by using some more sophisticated learning analytics techniques.
- 2.5 Final exams are not perfectly aligned with distance learning methodology and the geographical distribution of students. More opportunities for formative assessment during the module could be introduced.
- 2.6 The departments should reflect on the possibility of incorporating more controls for identifying authorship in final online exams.

Institutions' Response:

- 2.1 We agree with the EEC that gamification techniques would be ideal for increasing collaboration and interaction between students and would assist the learning process of students. To this end, the corresponding educational content laboratories of our universities have collaborated with the academics of the program and have introduced gamification techniques both in terms of guidelines and use framework as well as specific examples in the program

In regards to the integration of simulations and gamification software and the use of multimedia materials and resources, the Hellenic University has established the Onlabs. Please check the following website:

<https://sites.google.com/site/onlabseap/about?authuser=0>

The Onlabs is a 3D Virtual Environment simulating the biology lab of the Hellenic Open University and used for training biology students in making appropriate use of the laboratory equipment and conducting experiment. Similar capacities in hardware and software as well as in training and supporting faculty members are available to

Frederick University via the Open and Distance Learning Center (ODLC). Given the knowhow developed from the Hellenic University and in collaboration with Open and Distance Learning Center of Frederick University, advanced and emerging games and simulated environments in the field of law can be designed, developed and implemented, adjusted to the needs of the program courses, main aims and objectives. Additionally, the instructional designers from both universities can guide the instructors to identify and select existing simulations environments and games in the field of law. Existing simulation applications and games that can be employed are the following (or similar to the following): 1) <https://news.northeastern.edu/2014/09/25/virtual-courtroom-project/>, 2) <https://www.brainpop.com/games/courtquest/> and 3) <https://www.brainpop.com/games/lawcraft/>

Additionally, the promotion of gamification techniques and role-playing activities that simulate real situations can take place during the synchronous online sessions via the use of break out rooms, where students can work in groups to discuss, present and provide arguments on different cases. Also, gamifications techniques and approaches can be also employed via the use of high-quality gamified educational software system as well as by using gamification applications within the courses such as Kahoot, Quizizz, Socrative, Nearpod, Mentimeter, Poll everywhere, Gimkit, Plickets.

Finally, course assignments will be adjusted and revised based on the gamification techniques in order to increase student engagement and improve the desired results. The assignments will take advantage of gamification techniques such as levels, points, tasks/challenges and rewards. We are presenting two examples of the incorporation of gamification in the syllabus in **Annex 03**.

- 2.2 We agree that, as with most commencing programs, the study guides rely to a significant extent on textual content. As discussed with the EEC, the content improvement and enrichment is a continuous, never-ending process, which both universities have demonstrated the ability to undertake. The textual material presented in the study guides is upgraded in each review cycle with digital multimedia resources and educational material following all current trends and pedagogical approaches in distance learning (i.e. short length, subtitled, with non-textual information, narrative, audio-based materials, accessible, usable) The Educational Content, Methodology and Technology Laboratory of the Hellenic University in collaboration with the Open and Distance Learning at Frederick University pedagogically and technologically

support and guide the DL instructors in designing and delivering their courses. The two laboratories have all the necessary technological equipment, pedagogical knowhow and human resources to guide and support the instructors in the development of digital, multimedia educational material for their courses, as well as in finding such material (<https://eeyem.eap.gr/en/ecomet/>). The content of the study guides provides the basis to design and develop the content to be delivered via the Learning Management System.

- 2.3 The length of the units (10ECTS) is in line with existing practices in both Greece and Cyprus. We believe that having fewer units is better for distance learning students, especially those studying in full-time mode, as it allows them to focus on fewer areas. We accept and adopt the EEC's recommendation of providing more flexibility in the delivery of activities. This is achieved by having more flexible policies in relation to activities time schedules and participation in synchronous events.
- 2.4 The Learning Management Systems (LMS) used by both universities offer a wealth of information relating to the use and interaction of participants with the content and among themselves. As discussed with the EEC, further to traditional monitoring methods, the automated information collected will be analysed with the aim of identifying practices and developing more effective use policies as well as operational guidelines and rules.
- 2.5 The existence of face-to-face final examinations is a requirement by the current regulatory frameworks of both countries so we must abide by it. Both universities are positive to the introduction of more flexible assessment methodologies, either by incorporating electronic proctoring systems or by enhancing the formative assessment component in continuous assessment. We are happy to note that, given the experience of remote examinations during the COVID pandemic, the regulatory authorities are re-examining the examination framework and a fruitful dialogue to this end has commenced.

Firstly, it must be noted that online final exams were only introduced during the Covid-19 pandemic and that these were conducted fully abiding by the directives of both the competent regulatory authorities and the Commissioner for Personal Data. All final exams of DL programmes take place in person and are invigilated remotely by members of the academic staff of the University. The e-invigilator was provided by the

Studies and Student Welfare Service of the University with a course attendance list that included candidate photos (based on Student ID card) next to each student's name and registration number. The e-invigilator was responsible to identify all students by calling students to make sure that they are present, cross checking their names and photos. During online examinations and e-invigilation all students participated in the exam with the camera and microphones on at all times, ensuring that the camera recorded both the face of the student and the working space. All invigilation's were recorded.

Furthermore, all online examinations take place through the Safe Exam Browser, which is used to further safeguard the integrity of the online examination process and ensures that communication access is available to students.

Finally, it is noted that from analysis made on the results over the past semesters were online final examination was conducted we did identify any statistically significant deviations in mean or standard deviation of exam results or further inconsistencies between continuous and final assessments. It is further noted that the LMS used for the delivery of the program is set up so that it is mandatory for any submitted material to be processed by anti-plagiarism detection software. As mentioned earlier, the universities are in communication with the regulatory bodies for the establishment of an appropriate framework for the introduction of online final examinations and we are fully supportive of such a step that is central to the internationalization of our programs.

3. Teaching staff (ESG 1.5)

Strengths

- 3.1 The availability of staff from both Frederick University and the HOU will allow for the effective delivery of the programme. It would also ensure that the European law dimensions of various policy areas and the important impact of European Union Law are clearly communicated to students.

Areas of improvement and recommendations

- 3.2 While the External Evaluation Committee noted that 12 hours of teaching per week is required under Cypriot law, more flexibility could be introduced into the system. In many universities in Europe, there is an overall average of 50-50 (or 40% teaching, 40% research, and 20% administration), but also more variation among the staff. To be able to continue to provide high level academic courses, doing research in these areas is essential. The Committee would recommend more dialogue between the partner institutions, and more flexibility concerning the 12-hour rule. This would allow for variations in either the teaching load or research time and the optimal use of staff skills.

Institutions' Response:

- 3.1 We would like to thank the EEC for their comment. As the EEC members have noted, the programme has been carefully designed and supported by academic personnel from both Institutions with expertise, research activity and proven professional record in all fields of specialization related to European Law. Both Universities aim to provide the best quality of education possible, and through this collaboration the specialized know-how of the staff is clearly communicated to the students.
- 3.2 As per Frederick University's Regulations, the **maximum** teaching load of the academic staff is 12 hours per week. The teaching load also includes the teaching hours in the distance learning programs (a group of 30 people corresponds to 3-hour teaching load). As per the 96th Senate Decision (**Annex 4**) reduction of teaching hours is made for University officials, for research and teaching staff members with intense research activity or for research and teaching staff members to whom the University

assigns additional responsibilities and work e.g. members of Special Committees or other working groups. The exact number of reduction of teaching hours is approved by the Rector's Council, after a suggestion of the President of the Department and the consent of the Dean of the School.

The average teaching hours of the academic staff is around 10hours / week.

4. Student admission, progression, recognition and certification

Areas of improvement and recommendations

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| <p>4.1 Admission procedures for students from non-related disciplines could be better defined to maintain the equal treatment of all applicants.</p> <p>4.2 In relation to the certification process, it could be considered awarding an LL.M. to students with a law degree and an MA in European Law for students without a law degree and/or without a university degree</p> <p>4.3 The requirement of an English language certificate is laudable, but, in response to this, all modules should include at least some English reading materials.</p> |
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Department's Response:

- 4.1 As per the recommendations of the EEC, admission criteria and procedures are further defined as follows. It is noted that the criteria are in line with both institutions regulations as well as the relevant publication in the Greek Gazette (ΦΕΚ 5733/28-12-20) (**Annex 05**):

Accepted in this program are:

- Law degree graduates of Greek or Cypriot Universities or accredited, cognate foreign institutions.
- Graduates with degrees from domestic universities (Greek or Cypriot), or equivalent; or graduates from accredited and cognate foreign institutions, whose field of studies is relevant to European Law.
- Non-Law degree graduates can be accepted after the proposal of the program's Academic Committee and a decision from the administrative committee of the

Hellenic Open University (as the coordinating Institution) after liaising with the relevant bodies of Frederick University. The Academic Committee, examines applications of candidates from non-Law related disciplines, based on the following criteria: the candidate's academic performance in higher education; the courses taught at undergraduate level and their relevance to the objectives of the Program; the candidate's maturity and professional or extra-curricular experience related to the field of European Law; the candidate's stated interest and aspirations from participating in the Program.

Candidates should submit:

- A form of application to the master program
- A copy of their degree/ degrees from Greek or Cypriot Universities, or a Hellenic NARIC certified degree.
- A transcript of academic studies that includes the grades of all undergraduate courses and the precise degree grade.
- A curriculum vitae (CV) that includes a detailed description of the studies, work experience and as well as the scientific and social activity of the candidate.
- A Letter of Interest, clearly stating their interest in enrolling the programme.
- A copy of their ID or Passport.
- Candidates should present any further documentation requested by the Academic Committee of the Program (ex. Documentation of relevant employment and duties, research interests etc).

All applications are checked from the respective committees. If necessary, candidates might be called to be interviewed by the respective committees, on a day and time that is set by the programme coordinator. During the interview, all typical and essential qualifications of the candidate would be taken into account, as well as their general knowledge in the field if studies they want to specialize and their ability to successfully accomplish the program.

The table of the accepted students per semester is validated by the Academic Supervising Committee (ASC) of the program and after the two years of the canceling of ASC by the Special Interdepartmental Committee (SIC).

- 4.2 We agree with the EEC's recommendation. It is however noted that the matter is not of immediate importance given that the degrees are awarded in Greek, as reflected in the Greek Gazette (ΦΕΚ 5733/28-12-20) (in Greek: Μεταπτυχιακό Δίπλωμα Ειδίκευσης (ΜΔΕ) στο «Ευρωπαϊκό Δίκαιο») (**Annex 05**). Should the program be offered in the English language in the future, as is the intention of the Universities and the recommendation of the EEC, we are happy to follow the suggested dual award name.
- 4.3 We fully agree with the EEC's recommendation and to this end we have amended all course descriptions with complementary material in the English language that allows students to obtain a fuller and more current understanding of the concepts conveyed. The augmented course descriptions are provided in **Annex 06**.

5. Learning resources and student support

Areas of improvement and recommendations

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| <p>5.1 More visibility of the gender equality and non-discrimination policies of both institutions would be recommended.</p> <p>5.2 The students would also benefit from regular reminders of the available welfare and well-being support services of the universities.</p> |
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Institutions' Response:

- 5.1 Both institutions address matters of gender equality and non-discrimination, as well as matters of equality, diversity and inclusion very seriously. Frederick University has published its gender equality and non-discrimination policies on its web site (<https://www.frederick.ac.cy/university-governance/policies>).

Additionally, Frederick University has signed the Cyprus Diversity Charter and via the center of Professional and Personal Development at Frederick (PDF) already has setup a series of trainings and seminars related to Equality, Diversity and Inclusion (EDI) matters for academic staff (refer to **Annex 07**). Similar trainings and seminars will be scheduled for the students as well.

Furthermore, in the last Council meeting of Frederick University in June 2021 the Council has approved the "Code of Practice in relation to Prevention and Addressing of Harassment and Sexual Harassment" which is attached in **Annex 08**. The code will be published after a planned training process of the University Community.

The Hellenic Open University (HOU) is in progress, following a relevant decision of the Governing Committee (refer to **Annex 09**) the process of establishing a nine-member Committee for Gender Equality (EIF) whose work is:

- the elaboration of a policy plan for: the integration of gender dimension in the educational material and the curricula of the HOU, the promotion of women's position and their professional course in the HOU and the promotion of equal sex representation in academic and administrative committees and in the institutions body, as well as taking measures aimed at effectively addressing discrimination and harassment.

- the organization of actions or the participation in actions aimed at: the empowerment of women through training and skill development programs in order to increase their participation in responsibility positions, the participation of the academic community of HOU in actions related to gender issues, the networking of HOU with agencies and Institutions / networks / projects in the local community, in the country but also internationally that promote gender equality actions.
- the establishment and support of an online Community of Practice on gender equality and the participation of the HOU's academic community members and external members.

In addition, the Hellenic Open University's members, seeking to promote a culture without discrimination, has formed [a Code of Ethics](#) since 2014, which is posted on the HOU's page and occupies all members of the academic community, regardless of their political opinion, gender, racial or ethnic origin, religious or other beliefs, disability, age, sexual orientation, personal story, social and economic background. Furthermore, members of the teaching staff participate in various EDI Committees. For example, Prof. Vasileia Hadjinikita represents the Hellenic Open University in the "Regional Equality Committee", of the region of Western Greece. (**Annex 10**).

- 5.2 The welfare services of the two Universities will collaborate to ensure that support services from either university which the students are entitled to, are duly available and known to students. For this, a special announcement 'course' is available on the LMS, the main platform used by students, where relevant information will be posted. Furthermore, a push notification application is deployed that will notify students directly of any importance service announcement to ensure maximum utilization.

6. Eligibility (ALL ESG)

Areas of improvement and recommendations

6.1 No problem areas were identified.

Suggestions included the exploration of the provision of the joint programme in English in the near future.

Institutions' Response:

It is the intention of both universities to provide the joint programme in English in order to attract a European-wide audience, once the current program in Greek is up and running and the program committee addresses the 'teething problems' that invariably appear with the launching of any new program of study. This is in line with both universities strategic goal of internationalization.

7. Conclusions and final remarks

7.1 The External Evaluation Committee did not identify areas of non-compliance and is fully supportive of the proposed joint LL.M. in European Law, Distance Learning. It is a unique programme envisaged to attract high quality candidates from Cyprus, Greece and elsewhere. It is designed to provide a panoramic coverage of European Union Law and to impart knowledge and important skills to candidates or students wishing to find employment in diverse work environments. Its design and delivery will advance the strategic goals of internationalisation of both Frederick University and Hellenic Open University and will create greater synergies in course and programme development and research collaboration. The External Evaluation Committee was impressed with the e-learning methodology and both institutions' commitment to the continuous evaluation of courses, programmes and staff and the application of a rigorous quality assurance framework. The members of the teaching team are highly qualified to deliver the modules and research active notwithstanding their teaching commitments. The members of administrative staff, who participated in the discussions held on the 14 June 2021, were also highly committed and

enthusiastic. The committee noted that both physical resources and the IT infrastructure are more than adequate in delivering this programme.

Although the findings of the External Evaluation Committee are very positive, we would nevertheless wish to make some suggestions for the further improvement of the programme, as follows:

- 7.2 The publication of a Student Handbook for Postgraduate Studies, which would provide information about all masters and PhD programmes provided by Frederick University as well as the services and resources, including scholarships, which are available to students, should complement the future publication of the Study guide on the joint LLM in European Law.
- 7.3 Consideration should be given to the incorporation of gamification techniques and of multimedia materials and resources.
- 7.4 The External Evaluation Committee would recommend the provision of more flexibility in the submission of students' activities.
- 7.5 Student interaction and performance is monitored, but the process could be improved by using some more sophisticated learning analytics techniques.
- 7.6 More opportunities for formative assessment during the module could be introduced as well as more controls for identifying authorship in final online exams.
- 7.7 The Committee would encourage more flexibility concerning the 12-hour teaching per week rule for staff. This would allow for variations in either the teaching load or research time and the optimal use of staff skills.
- 7.8 Admission procedures for students from non-related disciplines must be better defined to maintain the equal treatment of all applicants.
- 7.9 In relation to the certification process, it could be considered awarding an LL.M. to students with a law degree and an MA in European Law for students without a law degree and/or without a university degree.
- 7.10 The requirement of an English language certificate is laudable, but in response to this all modules should include at least some English reading materials.

7.11 More visibility of the gender equality and non-discrimination policies of both institutions would be recommended.


7.12 The students would also benefit from regular reminders of the available welfare and well-being support services of the universities.

Firstly, we would like to sincerely thank the External Evaluation Committee for their hard work, the constructive discussions held during the virtual visit, and the valuable recommendations made for improving our proposed program. We are particularly happy that the EEC has identified that the proposed program is offered by academics of both institutions and provides a panoramic coverage of EU Law, something that was our intention from the beginning when we started thinking about this program. We are also particularly thankful that the Committee is fully supportive of the proposed joint programme.

In relation to the recommendations made by the EEC, we believe we have taken the necessary actions and have fully adopted them, as evident from our responses in sections 1 to 6 of this response.

We are looking forward to the positive decision by the Cyprus QAA and are eager to commence running the program from the coming academic year.

B. Higher Education Institution academic representatives

Name	Position	Signature
Prof. George Demosthenous	Rector	

Date: 01/06/2021

