

Θέμα: Παρατηρήσεις επί του Σχεδίου της Έκθεσης Πιστοποίησης του Προπτυχιακού Προγράμματος Δημόσια Διοίκηση του Ελληνικού Ανοικτού Πανεπιστημίου

First, we would like to thank the EEAP for the thorough investigation of the Public Administration Study Programme of the School of Social Sciences, and for the great effort they have made to examine in depth all the aspects/components of the Study Program and understand the distance learning principles and methodology of the HOU.

We very much appreciate and welcome the committee's detailed and constructive comments and recommendations.

Furthermore, we would like to provide our response (RC) to some comments (C) on the draft Accreditation Report and we would be grateful if they were taken into consideration when drafting the final report.

Comments – Responses to comments

Principle 1: Strategic Planning, Feasibility and Sustainability of the Academic Unit

C1. (Conclusions page 12) The strategic plans at the University, Faculty and Program levels are comprehensive and aligned amongst them. It is not clear as to who has been involved in drafting these strategic plans.

RC1. The HOU's office of strategic planning and development is responsible for the drafting of the strategic and operational plans (see file B3). Final approval was given by the HOU's Governing Committee (Decision No. 544/25-02-2022) following consultations of the Governing Committee's members with the institution's faculty and administrative staff, and having taken into consideration students' requests, stakeholders' opinions and the previous 2020-2024 Strategic Plan.

The Program's Operational Plan (see file B5), is drafted by the Study Program Director and the academic unit. It is then approved by the Dean's Committee and may be amended with the Committee's consent, if serious changes in the operating framework of the program are required. Any changes or additions to the plan will appear on the Program's website.

C2. (Conclusions page 12 & Panel Recommendations page 15) There is a comprehensive SWOT analysis which was conducted in 2021 however, the Strategic and Business Plan of the HOU, was written to cover the years 2022-2025; furthermore, there is an absence of a PESTEL analysis.

RC2. The current HOU's SWOT analysis examines its Strengths and Weaknesses, Opportunities and Threats at the environment in which it operates. The aim of a SWOT analysis is to access the institution's current situation, in order to approve the necessary decisions for the 2022-2025 Strategic Plan. According to Principle 1, point b page 9, the necessity of a SWOT analysis, but not a PESTEL analysis, was clearly identified. However, your recommendation for a PESTEL analysis is very much welcome and will be seriously taken into consideration for the updating of the strategic and operational plan, to be completed by the end of this year. It should be also mentioned that, the HOU's SWOT analysis examines issues also addressed in a PESTEL analysis, such as technological, social, environmental issues, etc.

C3. (Conclusions page 13) There is a need to address each weakness identified in the SWOT analysis and develop clear actions as to how to address these weaknesses.

RC3. Actions taken in order to address some of the weaknesses identified in the strategic and operational planning (see file B3) are included in the Institution's 2023 Target Goals (see file B8). Please refer to the table below:

Weaknesses identified from the strategic and operational planning document (file B3)	Actions that will be taken in order to address the Weaknesses recorded in the 2023 Institution's 2023 Target Goals document (file B8)
Δυσκολίες (λόγω της φύσης του Ιδρύματος) στην ανάπτυξη ενεργούς Πανεπιστημιακής κοινότητας με φυσική συμμετοχή Φοιτητών	ΣΤ 3.2 Ενίσχυση δεσμών με τους αποφοίτους του Ιδρύματος. Προγραμματισμός και υλοποίηση δράσεων για το δίκτυο αποφοίτων.
Προβλήματα αποθηκευτικού χώρου (πχ. επάρκεια σε αποθήκες, αποθήκευση υλικού σε μισθωμένα κτίρια, μη αυτόνομη αποθήκευση εγγράφων ανά υπηρεσία)	ΣΤ 4.1 Ανάπτυξη κτιριακών εγκαταστάσεων. Εκπόνηση Μελετών για, δημιουργία ιδιόκτητων κτιριακών εγκαταστάσεων και μείωση εξόδων ενοικίασης.

C4. (Conclusions page 13 & Panel Recommendations page 15) There is evidence of SMART objectives and Who will do What, When and How, however, all these objectives have deadlines for 31/12/2023. This is a short timeline for the efficient and effective implementation of all these.

RC4. Please note that the deadline 31/12/2023 was determined by the HAHE's invitation for the submission of proposals (Invitation Αρ. πρωτ.: 23390/23-07-21).

C5. (Conclusions page 13 & Panel Recommendations Page 15). More permanent faculty members should be hired so that the program doesn't depend heavily on part-timers

RC5. In Greece, new permanent faculty positions are allocated to the universities exclusively by the Ministry of Education, based upon their needs and subject to budgetary constraints.

Unfortunately, the Ministry of Education has been repeatedly very frugal with regards to new faculty positions for HOU, in spite of the numerous requests by the institution's administration for its academic reinforcement with permanent academic staff (requests submitted annually by the University to the Ministry of Education, see file B25, page 9, B25.14 & B25.18, page 17). However, it is worth mentioning that, adjunct faculty members offer HOU the flexibility to increase or decrease the number of sections (small groups of 25-30 students per tutor) of a thematic unit, depending on its enrolment numbers which may change from one semester to another. Furthermore, adjunct faculty members at HOU should not be considered as part-timers, since they participate fully in the institution's academic life, are treated with the same respect and consideration as permanent faculty members, and are enriching HOU with their academic achievements, and their teaching and research experience.

C6. (Conclusions page 13 & Panel Recommendations Page 15) The structure of the program and the courses offered appear to be realistic and relevant to the PA's mission and objectives, however, the Panel has not detected any elective courses being offered.

RC6. Concerning the program's elective courses during the 8th semester, the student has a choice of **2 out of 5 elective courses** (Presentations A 1.3 slide 11 and A1.4 slide 23 & file B5 page 16). At the time of the proposal submission (March 22) the 8th semester had not yet been offered.

C7. (Panel Recommendations Page 15) Add more masters' courses/programs in English.

RC7. The HOU's School of Social Sciences currently offers 3 masters' programs in English and has under development 3 new international study programs: *a) Hellenic Culture and Nature (collaboration with the University of Patras), b) Nursing Studies (collaboration with the Frederick University) and v) Business Economics (Collaboration with the Open University of Cyprus)* (see file B25, 25.1, page 20 & presentation 1.2 slides 11-12).

C8. (Panel Recommendations Page 15) It might be a good practice to create an advisory board with representatives from internal and external stakeholders who will provide the institution with high-level advice on its strategic planning on annual and/or long-term basis.

RC8. An external advisory board is under formation comprising of stakeholders from the labor market, academia, local government, civil servants, graduates, etc. (see presentation 1.4 slide 16). No additional information was requested.

C9. There is a need to be more aggressive in attracting more international students and faculty.

RC9. Distance learning has enabled Greek students who reside within European countries and elsewhere to attend the Programme. In the academic year 2021-2022 the program had

5 international students (see presentation 1.3 slide 38). Efforts will be made to increase the number of Greek-speaking international students in the near future.

Hence and with regard to Principle 1, we would appreciate a reconsideration of the Panel's judgement on Principle 1, since the grade on Principle 1 has a significant impact on the overall grade of the Draft Accreditation Report, resulting in an accreditation grade of C (partially compliant).

Principle 2. Quality Assurance Policy of the Institution and the Academic Unit

C1. (page 18, paragraph 4) What is worth mentioning here is the total lack of information about the appropriateness of the Temporary Teaching Staff qualifications, in the documents relative to both the Institution and the Unit.

RC1. In the submitted proposal for the program's accreditation, the data provided by the HOU was the information requested according to the HAHE's Invitation (see file B14).

C2. (Conclusions page 18 Paragraph 2 & Panel Recommendations page 19) The Institution's commitment to implementing a quality policy and to continuously improving its programmes is threatened by the lack of a rigorous procedure about the Temporary Teaching Staff requirements. It is also compromised by the Institution's lack of autonomy and by the Administrative Committee's mode of appointment.

RC2. The selection of the adjunct teaching staff adheres to all relevant law provisions and is a very competitive process, which is based on a transparent and merit-based system of selection criteria (see <https://www.eap.gr/wp-content/uploads/2021/04/pliroforiako-entypo-prokirixis-sep-2021-2024-ske.pdf>). In the case of candidates who have collaborated with HOU in previous year(s) special emphasis is placed on the results of their evaluation by their coordinators and the students. The selection criteria concerning adjunct teaching staff are addressed in the Presentation 1.4, slide 52 and in the file B01. page 29. No further information was requested.

C3. Consider courses and permanent training in IT in the undergraduate programme of studies, for the acquisition of digital skills.

RC3. Proof of computer literacy is required, In order for a student to be admitted to the programme (see presentation 1.3 slide 6).

Considering the above, we would appreciate a reconsideration of the Panel's judgement on Principle 2.

Principle 3: Design, Approval and Monitoring of the Quality of the New Undergraduate Programmes

C1. (page 23 paragraph 2) The number of tenured teaching staff is extremely low (1 member) that of the Adjunct (temporary) is unjustifiably high (181) (page 23)

RC1. Please refer to Principle 1 C5.

C2. (page 23 paragraph 3) Each Tutor is appointed to one group of approximately 30 students. There is no information about the total number of groups in each course and the work overload of the Tutors. As there are 170-175 or even 181 Tutors appointed to 72 courses.

RC2. Please note that, at HOU 1 module corresponds to 3 courses at conventional universities. Considering that the programme consists of 25 modules (2021-22) the Adjunct Teaching staff amount to an average of 7 per module, with a coordinator responsible for each module's organization. The large number of tutors per module is due to HOU's policy to create sections with small groups of 25-30 students, adopting the distance education methodology (See Presentation 1.3 slide 35).

C3. (page 23 paragraph 5) Last but not least, the Panel has not received information about the Administrative Committee members' appointment criteria, composition, qualifications and duration of their mandate.

RC3. No information was requested.

C4. (page 23 paragraph 6) Regarding dissertations, no information is provided about the number of topics suggested;

RC4. No information was requested.

C5. (Conclusions page 25 paragraph 2 & Panel Recommendation page 27) The curriculum is not structured according to a progressive order, i.e., from the basic notions in the different fields to thorough analysis of the legal regulations and public policies; devoid of rational organization, it risks offering the students a fragmented knowledge of each field; modules (thematic units), especially those taught in the later terms, should be composed of courses belonging to the same field. As far as the content of the courses is concerned, focus on administrative law is largely insufficient, to the extent that students attend one single course in the law's basic principles; two different courses should be added, covering the general and the special part of the discipline. Several sectors of law are not taught ex., the law of the judicial and of the penitentiary system, the law of cultural heritage.

RC5. The curriculum is drafted in such a manner so that students have an equal triple-edged knowledge of issues pertaining to legal, economic and policy aspects of the public sector. It

has been the endeavor of the programme's founder to keep that balanced content of the programme, taking into consideration that this is the case in similar programmes offered by other Greek state Universities. Therefore, there are particular elements that we would like to draw your attention to. The first four semesters offer a more holistic view of the general knowledge that students need to receive. With regards to legal material, students are taught the foundations of public law (including both constitutional and administrative law) and also elements of international and European public law. This choice is made on purpose, so as to smoothly introduce students to the Greek and international legal systems. This is the reason why, during the final four semesters, students have the opportunity to examine more thoroughly issues concerning human rights, the interrelation of the Greek legal order with international judicial and quasi-judicial bodies etc. In addition, students are exposed to aspects of the everyday life of public servants and how to get informed about new legislation that emerges, and are offered the opportunity to discuss such issues with their tutors.

C6. (Conclusions 3rd paragraph & Panel Recommendation page 27) The students indicated that they do not have in situ access to other Universities' libraries.

RC6. The HOU's Distance Library and Information Center provides its services remotely and online, and ensures that its users are informed and educated about their use. At the same time, the Interlibrary loan service, enables students to borrow material from other libraries, on-site or by mail, but also through on-site facilitation, using a study hall and/or photocopying material from their collection, always following the policy of the respective library. The on-site access to other libraries is covered by partnership agreements (see file B1 page 36 1st paragraph & page 37).

C7. (Panel Recommendation page 27) Improve the learning outcomes, by the addition of new courses in the new forms of government and in the global issues for public administration (e.g., climate change, global poverty and global public goods, migrations, corruption, tax evasion and tax havens).

RC7. Many of the above topics suggested by the Accreditation Committee are covered by the current curriculum. More specifically, and as far as global issues for public administration are concerned, students are exposed to such broader concepts and points of concern during the 7th semester of their studies. In particular, the module entitled International Organizations and Public Administration covers issues such as climate change, global poverty and public goods through the lens of international documentation and soft law produced by international organizations. Thus, this class offers a unique opportunity for students to come along other issues of everyday life which affect public administration subtly or indirectly (see file B11).

C8. Make obvious the qualification, the appointed course and the work overload of the Adjunct (Temporary) teaching staff, which is definitely committed to the students but cannot ensure coherent content and methodology, because of its great number.

RC8. The adjunct teaching staff are highly qualified individuals, selected through a rigorous and very competitive selection process. In spite of their large number per module, a coherent content and methodology are ensured by the coordinator of each module. She or he makes sure that all tutors have a common path with regards to the main methods and core values in their teaching. This is achieved through regular meetings of the coordinator with the teaching staff, in which the pace is set for the course during the semester.

C9. (Panel Recommendation page 27) Create two courses in Administrative Law (General and Special Part), instead of the existing introductory course. Create a more consistent course in Constitutional Law.

RC9. The Public Administration undergraduate program exposes students to the general and special parts of Administrative Law in the Hellenic Administrative System through the following modules: Greek Administrative System-module 13, Ethics and Deontology of Administration-module 42, Reform and Changes of Public Administration-module 63, Regional and Local Governance-module 72, Public Servants Law-module 81, Anti-Criminal Policies, module 84-Elective Course). Thus, the Administrative Law is taught in a modern interdisciplinary manner, which befits a Public Administration undergraduate programme rather than a Law programme.

C10. (Panel Recommendation page 27) Invite international Academic staff.

RC10. Professors currently teaching in many EU countries are also teaching as adjunct lecturers at HOU's Public Administration undergraduate programme (see Presentation 1.3 slide 37).

C11. (Panel Recommendation page 27) Give the students access to the books which include the uploaded excerpts suggested by the Tutor.

RC11. Access to books and material is provided given that a large part of the books and material provided to the students (articles, papers, legal sources) is of an open access character. It should be noted that the provision of hard copy books is not included in the students' tuition, which otherwise would be much higher. However, hard copies are provided only in cases an excerpt is not sufficiently covering the needs of a subject matter. All books included in the syllabuses are accessible through the HOU's library and from the OPAC national system of university libraries available to the HOU's students and to all Greek students.

C12. (Panel Recommendation page 27) Replace the fragmented exposition of courses within a Thematic Unit by two or even three courses in the same field, i.e., law, economics, political science, public administration.

RC12. At HOU, the Thematic Units (modules) and their structure follow the distance learning methodology applied to all Open Universities. A module is equivalent to 2 or 3 courses at conventional Universities and it combines courses belonging to the same or broader scientific field. Thus, “courses” belonging to a Thematic Unit are not fragments but parts of an interconnected whole (either law, or economics etc.). For example, Thematic Unit 11 comprises subject matters which are interrelated such as: theory of the state and sovereignty, sources of constitutional and public law (basic principles), organs of the state (division of powers, executive, legislative and judiciary) and courts organization. It should also be noted that, the variety of topics covered in a Thematic Unit is more appealing to the students as compared to a Thematic Unit covering a single subject matter.

Considering the above, we would appreciate a reconsideration of the Panel’s judgement on Principle 3.

Principle 6: Ensuring the Competence and High Quality of the Teaching Staff of the New Undergraduate Study Programmes

C1. (page 40 paragraph 1) There is no information on the evaluation of RTS (permanent) Faculty.

RC1. Reference made in students’ evaluation questionnaires to “Αξιολόγηση του Καθηγητή – Συμβούλου” (see file B16) pertains to both permanent and adjunct teaching staff. Therefore, all academic staff are evaluated. No additional information was requested.

C2. (page 41 paragraph 2 & Panel Recommendations page 42) The disproportionately large number of ATS temporary employees, vs RTS, permanent employees. There are only three RTS employees on the new study programme, with over 170 temporary employees. This entails risks for the medium- and long-term development of the programme and the uniformity of quality in its delivery, as well as the academic standing of the programme and the Institution

RC2. Please refer to Principle 1 C5 & Principle 3 C2.

C3. (Panel Recommendations page 42) Recruitment of permanent Faculty (RTS) must increase, and must be done with transparent open procedures, to attract best talent and avoid stagnant conditions in other Greek Universities.

RC3. Please refer to Principle 1 C5.

Considering the above, we would appreciate a reconsideration of the Panel's judgement on Principle 6.

Principle 8: Collection, Analysis and Use of Information for the Organisation and Operation of New Undergraduate Programmes

C1. (Conclusions page 49 & Panel Recommendations page 50) There is no evidence of assessment of the administrative staff.

RC1. Evaluation of the Administrative and Technical Services is conducted by the HOU's Internal Evaluation Unit (please refer to file B16 Point Δ).

C2. (Conclusions page 49 & Panel Recommendations page 50) There is no evidence of input/feedback provided by external stakeholders for curriculum development.

RC2. Please note that the Program was designed by a working group consisting of HOU's faculty members, distinguished University professors with broad knowledge of the programme's scientific field, as well as senior officials from the Ministry of Administrative Reform (see cf B1 page 12). Additionally, an external advisory board is under formation, involving the participation of stakeholders from the labor market, academia, local government, public administration, as well as graduates, etc. (see presentation 1.4 slide 16). No additional information was requested.

Considering the above, we would appreciate a reconsideration of the Panel's judgement on Principle 8.

Principle 10: Periodic Internal Review of the New Study Programmes

C1. (Panel Recommendations page 55) The results of the quality assurance process must be communicated, including executive summaries of the findings, and transform them into mission statements to strengthen the institution's adoption of a culture of quality assurance.

RC1. The HOU's Internal Evaluation Unit communicates executive summaries of the programme's findings to the Study Programme Director who according to the findings draws the programme's Target Goals. At the beginning of each year, the Programme's Target Goals are set by the Study Program Director, finalized and approved by the Study Program Committee and subsequently by the Dean's Council. In the coming year, a comprehensive report will be drafted in order to define the new target goals, taking into account: The Programme's four-year Operational Plan, the previous year's target setting results, the programme's Annual internal evaluation, the student's evaluation results by the Internal Evaluation Unit, excerpts of the Quality Assurance unit (findings/recommendations), the Programme's External Evaluation Report (if available), and the indicators of the Integrated Information System of HAHE (see presentation 1.4 slide 27, 55).

C2. (Panel Recommendations page 55) Be more closely connected to action plans at regular intervals given the impressive production of volumes of different statistical data.

RC2. In order to connect action plans at regular intervals given the impressive production of volumes of different statistical data, the Internal Evaluation Unit highlights the critical issues deriving from the quality data and forwards statistical information to the Study Programme director, the Thematic Unit coordinators, the Schools etc. (see B1, page 48).

C3.(Panel Recommendations page 55) External stakeholders, such as the business community, the alumni association of HOU and other social groups with which the university interacts, may provide information on HOU's quality.

RC3. An external advisory board is under formation consisting of stakeholders from the business community, academia, local government, public administration, as well as graduates of the Programme, etc. (see presentation 1.4 slide 16).

C4. (Panel Recommendations page 55) Include input from students in the decision-making process.

RC4. The HOU has included student representation in the Governing Committees decision-making process as well as in the quality assurance body (see presentation 1.4 slide 16)
<https://www.eap.gr/ekproswpoi-foihtwn-sta-syllogika-organa-dioikisis/>

Considering the above, we would appreciate a reconsideration of the Panel's judgement on Principle 10.

In conclusion, we sincerely appreciate the effort of the Committee to provide an accurate, thorough and forward-looking accreditation report. We remain at the Committee's disposal for any further information or clarifications.