

HAHE CODE OF ETHICS

The HAHE Code of Ethics is part of the HAHE regulatory framework and applies to the Higher Education Institutions (HEIs) and the University Legal Entities (ULE) under review by the HAHE, as well as to the members of the External Evaluation & Accreditation Panels (EEAP), the HAHE Review Coordinators, and the members of the HAHE Evaluation & Accreditation Council (EAC), to ensure the integrity and the impartiality of the relevant procedures, as specified below.

This Code of Ethics is an active document and shall be reviewed and updated periodically to reflect developments in accreditation practices in the European Higher Education Area, and the applicable national legal framework. All parties engaged shall be notified of any substantive modifications.

1. Members of the External Evaluation & Accreditation Panels (EEAP)

All Panel members are required to read, understand, and abide by the following principles of ethics and professional conduct throughout the accreditation process, as a pre-condition for their appointment. The EEAP members declare in writing that they are aware and accept the Code of Ethics. Violations of this Code of Ethics may result in withdrawal of the Panel member's appointment and exclusion from future HAHE review Panels.

The members of the External Evaluation & Accreditation Panels (EEAP) commit themselves to:

- Act with professionalism and expertise. Panel members shall apply their knowledge and experience rigorously, fairly and in good faith, maintaining the highest standards of professional conduct throughout the review.
- Treat the members of the Institution under review, the HAHE review Coordinators, and the other participants with due respect and professional courtesy and abstain from any confrontational, dismissive, or otherwise inappropriate behaviour.
- Act with integrity, objectivity and confidentiality. The Panel members must make an impartial judgement based on their expertise, solely on the basis of the evidence presented and the applicable Accreditation Standards, free from any external influence, potential inducement, or personal bias.
- Thoroughly examine the information and background data submitted, and act in a transparent, consistent, and accountable manner, ensuring that their assessments are clearly reasoned and evidence based.
- Base their assessments on the findings gathered and take into consideration that the accreditation process is oriented towards improvement, rather than just identifying areas of weakness.
- Take into account the context of the Greek Higher Education.

- Follow the guidelines of the HAHE and adhere to the philosophy of quality assurance and continuous improvement.
- Follow the Mapping Grid and give due consideration to all applicable Accreditation Standards throughout the site visit. All assessment areas and standards must be adequately addressed, either through the review of the submitted documentation or through the interviews with representatives of the institution and stakeholders, or both. No criterion, or principle shall be deemed of lesser importance, treated as self-evident, or regarded as sufficiently established by common knowledge so as to exempt it from independent and thorough validation by the Panel. Each area of assessment warrants deliberate scrutiny in its own right, in accordance with the Panel's obligation to conduct a rigorous, evidence-based, and consistent review process.
- Foster a culture of collaboration, mutual support, and shared professional responsibility. This includes promoting open and effective communication among Panel members, actively contributing to the collective knowledge base, and ensuring that all judgements and outputs reflect a genuinely collegial and cooperative working process.
- Treat all fellow EEAP members, as well as representatives and participants of the host Institution with due respect, fairness, and dignity at all times. Panel members shall not engage in any form of discrimination. They are obligated to ensure equal opportunity for each Panel member to pose questions and to actively facilitate an inclusive environment in which all participants are provided with adequate space and time to express their views and respond to the Panel's questions, within the constraints of the meeting's allocated timeframe.
- Work collectively as a team under the guidance and coordination of the Panel Chair, and adhere to the defined deadlines.
- Avoid any cases where a potential conflict of interest may arise. The members of the Panel should inform the HAHE of any association with the Higher Education Institution/ University Legal Entity (and its parent Institution) or the Programme under review (currently, or during the past five years), and of any scheduled engagement or affiliation, so that their impartiality may not be questioned. Cases which might lead the Panel members to a conflict of interest are, indicatively, professional or research collaborations with members of the academic staff of the Institution in question, special awards received by the Institution, and any other relationship that entails a personal, financial or other benefit or may influence or may appear to influence the impartial and objective performance of their duties. The HAHE will consider each case separately.
- Respect the fact that the evaluation must not be used as a means for a potential growth of personal interest in any way. All those who have been members of External Evaluation & Accreditation Panels should avoid using information related to the evaluations for financial profit (e.g. by serving as consultants for University Legal Entities/HEIs that they have reviewed), without the permission of the HAHE.
- Maintain complete confidentiality regarding the entire evaluation process, during and after it, on all matters that have come to their knowledge, and not disclose any confidential information gained by or conveyed to them during the course of their work.

This kind of confidential information should only be used for the purpose of the evaluation, and is not to be disclosed to third parties.

- Acknowledge that they are aware of the collection and processing of personal data which they have made available to the HAHE or/and are provided to the HAHE through the declaration available at the HAHE link: <https://www.ethaae.gr/en/terms-of-use> .

Furthermore:

The **Chair of the Panel** is mainly responsible for the organisation and coordination of the discussions and for averting or releasing any tension that may come up during the entire review process. In addition, the Chair is responsible for the timely submission of the Accreditation Report to the HAHE, and serves as a contact between the HAHE and the Panel.

Since the purpose of the Accreditation Report is to present the Panel's conclusions regarding compliance with the Standards, together with recommendations for enhancement derived from its findings and analysis, the EEAP is required to reach a clear, unified, and evidence-based judgement through consensus. Any differing or concurring views among Panel members must be thoroughly examined during the EEAP deliberations and duly taken into account in the consensus-building process. These deliberations are strictly internal to the EEAP and are not reflected as separate opinions in the final Accreditation Report.

The Panel, under the leadership of the Chair, bears collective responsibility for ensuring that all perspectives are appropriately considered and that a coherent, well-substantiated, and unambiguous consensus is formally communicated to the HAHE through the Accreditation Report.

2. Members of the HAHE Evaluation & Accreditation Council (EAC)

The following principles of ethics and professional conduct govern the exercise of the duties of the members of the Evaluation and Accreditation Council (EAC) of the Hellenic Authority for Higher Education (HAHE) in the context of the accreditation decision procedures and any related activity falling within their institutional mandate. They shall apply to all EAC members throughout the preparation, examination, deliberation, adoption, and follow-up of accreditation decisions.

The EAC members present to the Council the Accreditation Reports that fall within the scientific field they supervise, except for those Reports linked to the HEI department where they serve or from which they retired. For the presentation of these Reports, another EAC member of a relevant scientific field is designated.

In the discharge of their responsibilities, EAC members shall act in accordance with the applicable legal and regulatory framework, the HAHE Quality Standards, the governing accreditation procedures, and the principle of fair decision-making.

In particular, the EAC members shall:

- Perform their duties with professionalism, accountability, diligence and responsibility and in accordance with the Law.
- Exercise their judgement independently and base their decisions exclusively on the Accreditation Report, the applicable Quality Standards, the material lawfully submitted within the accreditation procedure, and the requirements of the HAHE operational framework. They shall not allow personal views, institution affiliations, prior relationships, external pressure, political considerations, or private interests to influence their assessment or decision.
- Act in a spirit of collectivism and cooperation. EAC members shall contribute to deliberations in a respectful, collegial, and professional manner and shall ensure that differing views are expressed and examined fairly. They shall support clear, reasoned, and consistent decisions, duly grounded in the record of the procedure and the applicable standards, and shall respect the collective nature of formally adopted EAC decisions.
- Not engage in any direct or indirect communication with Institutions under review, EEAP members, or any third party for the purpose of improperly influencing, anticipating, or informally shaping the outcome of a pending accreditation procedure. Any communication relevant to an accreditation procedure shall take place only through the formally designated channels and in accordance with the applicable procedural framework.
- Minimize conflicts of interest and avoid situations where personal interests could compromise their objectivity or the independence of their decision. EAC members shall declare any actual, potential, or perceived conflict of interest that may affect, or may reasonably be perceived as affecting, their independence, objectivity, or impartiality in

relation to a specific accreditation procedure. Where such a conflict exists, the member concerned shall disqualify themselves from any discussion, assessment, deliberation, or decision-making connected with that procedure, and the disqualification and the measures taken to manage the conflict shall be duly recorded. The disqualification process shall be carried out transparently, and alternate arrangements shall be made to ensure integrity and objectivity.

- Abstain from soliciting or accepting gifts, benefits, or any other advantage that may affect, or may reasonably be perceived as affecting, their independence, objectivity, or judgement. Any offer of such benefit made in connection with their role shall be declared promptly in accordance with the applicable HAHE rules.
- Preserve the confidentiality of all non-public information, documents, deliberations, opinions, draft texts, personal data, and information obtained in the exercise of their duties. Such information shall be used solely for the purposes of the accreditation procedure and shall be processed lawfully, transparently, and securely, in compliance with the applicable data protection Law and the HAHE ethics and values.
- Abstain from the discussion and the decision-making on the accreditation of a Study Programme in the pertinent EAC meeting, where the Programme in question belongs to the Institution they serve or from which they retired.

3. HAHE Coordinators of External Evaluation and Accreditation Reviews

HAHE review Coordinators play an important role in upholding the orderly conduct and credibility of the accreditation review process, serving as the primary interface between the External Evaluation and Accreditation Panel (EEAP), the Institution under review, and the HAHE's internal governance structures. Thus, their conduct must exemplify the core values of the HAHE: Integrity, Accountability, Respect, Collaboration, and Continuous improvement. The following principles set out their ethical and behavioural obligations, and shall apply to all HAHE review Coordinators, including permanent staff members and external collaborators.

HAHE review Coordinators shall:

- Perform their duties with professionalism, diligence, competence, a high sense of responsibility, and commitment to the quality assurance mission of the HAHE.
- Treat the EEAP members and Institution representatives with due respect, fairness, dignity, and professional courtesy.
- Act as the primary point of contact and coordination between the EEAP and the Institution throughout the accreditation procedure, ensuring communication is maintained exclusively through the formally designated channels and procedures. In this capacity, the coordinators shall facilitate any request by the Panel for additional information or documentation from the Institution, without assessing, filtering, or prejudging the relevance or significance of such requests.
- Communicate clearly, accurately, and promptly with all stakeholders of the review, and ensure that all stages of the review process are properly documented and traceable. Any guidance provided shall be limited strictly to the procedural and formal aspects of the review process and should not constitute coaching on substantive quality matters or on the presentation of evidence.
- Refrain from influencing, guiding, or shaping the Panel's deliberations, judgements, opinions, or conclusions, and ensure that it is made clear in all interactions that the final accreditation decision is taken by the HAHE Evaluation and Accreditation Council (EAC).
- Treat all information obtained in the course of the review procedure as strictly confidential and abstain from sharing confidential documentation or information with parties outside the review process. This obligation continues beyond the conclusion of the review process.
- Process all personal data lawfully and securely, in compliance with the General Data Protection Regulation (GDPR) and the applicable national data protection legislation, and use such data solely for the purposes of coordinating the review procedure.
- Disqualify themselves from any part of the review procedure to which an actual, potential, or perceived conflict of interest relates. A conflict of interest shall be deemed to exist where a HAHE review Coordinator's personal, professional, or other interests interfere with -or may reasonably be perceived as interfering with- their objectivity or impartiality in relation to a specific review procedure.

4. Institutions under External Evaluation and Accreditation review

All Institution members and external stakeholders engaged in the review process of the Higher Education Institutions (HEIs) and the University Legal Entities (ULE) are bound by the following ethical and behavioural rules. Adherence to these rules is a prerequisite for the integrity and validity of the accreditation process. Any serious or repeated breach of this Code on behalf of the Institution may compromise the accreditation process. The HAHE reserves the right to take the nature and extent of the breach into account in the accreditation decision.

All members of the Institution and invited individuals participating in the review procedure on behalf of the Institution shall conform to the following principles:

- The Institution bears full responsibility for the accuracy and currency of all submitted material in the accreditation proposal and any additional material that might be requested during the review.
- The Institution should not publicise the launch of a study programme (registration of students, start of semester) prior to its accreditation.
- All information provided to the External Evaluation and Accreditation Panel and to the HAHE shall be accurate, complete, and compliant with the current institutional and regulatory framework. Deliberate withholding, misrepresentation, or selective presentation of information might be considered as a violation of this Code.
- Any potential conflict of interest with a member of the External Evaluation and Accreditation Panel should be notified to the HAHE, duly substantiated, within no more than three working days of the announcement of the composition of the Panel.
- The Institution shall comply with all procedural requirements established by the HAHE, including the preparation and submission of the proposals and the documentation, and the observance of deadlines. Modifications of the site visit Timetable in terms of the sequence or the duration of the meetings may be allowed only on serious grounds, and following to the HAHE approval.
- The HAHE is responsible for the communication with the members of the Panel and for forwarding all relevant information to them. Any direct communication between the administration or the teaching staff of the University with the members of the Panel prior to the review is considered inappropriate and might compromise the validity of the review procedure.
- In particular, during the site visit (either onsite or virtual) all participants shall:
 - Treat the Panel members, the HAHE review Coordinators, and the other participants with due respect and professional courtesy and abstain from any confrontational, dismissive, or otherwise inappropriate behaviour. The Institution accepts full responsibility for the proper conduct of all its representatives throughout the review process.

- Respond to the Panel's questions openly, honestly, and constructively, providing clear and evidence-based answers.
- Allow other participants to express their views without interruption, and ensure that an inclusive environment is maintained in which all voices can be heard, within the constraints of the meeting's allocated timeframe.
- Refrain from directing, coaching, or otherwise influencing other participants in their responses before or during the interview sessions.
- Any comments on the draft Accreditation Report submitted to the HAHE in the context of the review process should be limited to potential factual errors and should not include direct judgement on the assessment or on the recommendations formulated by the Panel.
- The Institution shall not publicly disclose, discuss, or otherwise circulate any information relating to the Panel's provisional findings or assessments prior to the official publication of the Accreditation Report by the HAHE.
