

Doc. 300.3.2

Date: 05/08/2025

Higher Education Institution's Response

(Departmental)

- **Higher Education Institution:**
NATIONAL AND KAPODISTRIAN UNIVERSITY OF ATHENS (NKUA) – CYPRUS BRANCH
- **Town:** Nicosia, Cyprus
- **School/Faculty:** Medical School
- **Department:** Basic and Clinical Science
- **Programme(s) of study under evaluation**
Name (Duration, ECTS, Cycle)

Programme 1

In Greek:

ΠΡΟΓΡΑΜΜΑ ΠΡΟΠΤΥΧΙΑΚΩΝ ΣΠΟΥΔΩΝ ΤΜΗΜΑΤΟΣ ΙΑΤΡΙΚΗΣ (ΕΚΠΑ) – ΠΑΡΑΡΤΗΜΑ ΚΥΠΡΟΥ (6 ΧΡΟΝΙΑ, 360 ECTS, ΠΡΩΤΟΣ ΚΥΚΛΟΣ ΣΠΟΥΔΩΝ)

In English:

UNDERGRADUATE STUDY PROGRAMME – DEPARTMENT OF MEDICINE (NKUA) – CYPRUS BRANCH (6 YEARS, 360 ECTS, FIRST CYCLE)

- **Department'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 2021 [L.136(I)/2015 – L.132(I)/2021].

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. Department's academic profile and orientation

Sub-areas

- 1.1 Mission and strategic planning**
- 1.2 Connecting with society**
- 1.3 Development processes**

1.1 We thank the committee for granting compliance in this sub-area and we endorse their suggestion for a combined use of data from both sites.

1.2 We thank the committee for granting compliance in this sub-area and we endorse their suggestion for enhancing recording of progression, achievements and positions of alumni.

1.3 We thank the committee for granting compliance in this sub-area

With regards to the overall assessment, offering prospective students the opportunity for high quality medical / clinical education, to the top standards that NKUA School of Medicine operates on for almost two hundred years, should not be regarded as a threat, but should instead be welcomed and encouraged.



2. Quality Assurance

Sub-areas

- 2.1 System and quality assurance strategy
- 2.2 Quality assurance for the programmes of study

We thank the committee for granting compliance in this sub-area. We endorse the suggestion with regards to including UCy Library in the offered facilities. In its initial infrastructure, the Branch will have its own library, which admittedly will require extension in the future.



3. Administration

We appreciate the concern of the committee on the fact the branch is not functioning yet, and we are grateful for being granted compliance on this sub-area.



4. Learning and Teaching

Sub-areas

4.1 Planning the programmes of study

4.2 Organisation of teaching

We appreciate the comment of the committee with regards to interaction between students of UCy and students of the proposed Branch. Firstly, according to plans, students will not use the facilities at the same time. Interaction will be encouraged but not imposed. We are therefore confident that UCy students will benefit from the interaction rather than feeling dominated.

We are thankful for being granted compliance in this sub-area

5. Teaching Staff

It is our understanding that the scoring reflects the fact that “Very few of this can be assessed since the program is not yet in operation”, as indicated in the comments of the EEC for this section. However, we wish to emphasize that as it was repeatedly highlighted throughout the two-day discussion, the NKUA School of Medicine is staffed with over 600 tenured educators. NKUA is renowned for the quality of its staff, and this guarantees the quality of the teaching staff that will cover the branch until its full operation, following its accreditation. There is no reasonable doubt that “loaned” staff will deliver equally high-quality teaching in Cyprus. Regarding the staff that will be recruited specifically for the Branch, the same rigorous criteria, as those applied in the NKUA recruitment procedures, will be applied for the Cyprus Branch, so as to recruit highly qualified educators.

With regards to research, research opportunities for the academic staff to be placed in Cyprus were explicitly presented through the process, and Faculty presented specific examples on how research will be available from day 0. As also pointed out by the EEC, the use of UCY facilities will be beneficial to both UCY and the Branch regarding support of research opportunities. Finally, the committee itself actually presents all the necessary arguments in favour of at least 4/5 marking of this sub-area in their own “Strengths” section.

6. Research

On the two provided assessments, in the sub-area of research, the committee has presented two significantly different markings.

07.14.516.003 (current document)		1 - 5	07.14.509 (institutional assessment)		1 - 5
6.1	The Department has a research policy formulated in line with its mission.	5	6.1	The Institution has a research policy formulated in line with its mission.	5
6.2	The Department consistently applies internal regulations and procedures of research activity, which promote the set out research policy and ensure compliance with the regulations of research projects financing programmes.	3	6.2	The Institution consistently applies internal regulations and procedures of research activity, which promote the set out research policy and ensure compliance with the regulations of research projects financing programmes.	5
6.3	The Department provides adequate facilities and equipment to cover the staff and students' research activities.	2	6.3	The Institution provides adequate facilities and equipment to cover the staff and students' research activities.	3
6.5	The results of the teaching staff research activity are published to a satisfactory extent in international journals which work with critics, international conferences, conference proceedings, publications, etc. The Department also uses an open policy for publications, which is access consistent with the corresponding national and European policy.	4	6.6	The results of the teaching staff research activity are published to a satisfactory extent in international journals which work with critics, international conferences, conference proceedings, publications, etc. The Institution also uses an open access policy for publications, which is consistent with the corresponding national and European policy.	5
6.6	The Department ensures that research results are integrated into teaching and, to the extent applicable, and implements a policy of promotes transferring know-how to society and the production sector.	4	6.7	The Institution ensures that research results are integrated into teaching and, to the extent applicable, promotes and implements a policy of transferring know-how to society and the production sector.	4
6.7	The Department provides mechanisms which ensure compliance with international rules of research ethics, both in relation to research activity and the rights of researchers.	5	6.8	The Institution provides mechanisms which ensure compliance with international rules of research ethics, both in relation to research activity and the rights of researchers.	5
6.8	The external, non-governmental, funding of research activities of teaching staff is similar to other Departments in Cyprus and abroad.	2	6.9	The external, non-governmental, funding of research activities of academic staff is similar to other Institutions in Cyprus and abroad.	4
6.9	The policy, indirect or direct of internal funding of the research activities of the teaching staff is satisfactory, based on European and international practices.	2	6.10	The policy, indirect or direct of internal funding of the research activities of the academic staff is satisfactory, based on European and international practices.	4

We do appreciate the two documents refer to the Department and the Institution respectively, but policies, operation, staff, and outcomes are identical, therefore we do not understand the radically different evaluation.

With regards to areas for improvement, the first point made by the committee regarding the agreement with UCy looks like it should have been included in the strengths. As for the training of students on research skills, throughout the two-day discussion, the School presented on several occasions its ongoing research-focused teaching, which includes lectures and workshops.

We welcome the suggestion of a joined PhD program, but this refers to future plans. Therefore, this should not be regarded as a shortcoming of the proposal at hand.

With a 60M euros of research funding of the NKUA Department of Medicine over the previous year, we are not sure why the committee found external and internal funding not compliant in the current assessment (certification of research funding is attached in Annex 6 of the Medical School's Response (Basic Medical Education) form). Similarly, with over 300, student-led scientific publications over the past 5 years, we also fail to understand why the committee considers this area as partially compliant. Equally, the overall standing of the NKUA School of Medicine, in international metrics and rankings leaves no doubt about the offered motivation for research, therefore in this area too, we feel that compliance is proven.

Overall, we believe that the information provided, as well as relevant data publicly available and easily accessible, do not support the assessment of the committee on the sub-area of Research.



7. Resources

As previously indicated, there already exists an MoU with UCy. Furthermore, the clinical capacity of the parent institute by far exceeds that of the existing institutions. Moreover, the students that will apply for this program will do so primarily because of their appreciation for NKUA School's clinical training reputation. The NKUA branch School of Medicine is ready to offer the curriculum as presented above. Opportunities in Greece exist and will be used to enhance clinical exposure and depth of knowledge. NKUA has a long-standing immaculate track record of successful projects. The Administration of the School and the Senate have provided written approval for utilization of its Athens infrastructure. We are thankful for being granted compliance in this sub-area.

B. Conclusions and final remarks

With regards to the challenges described by the committee:

1. The NKUA School of Medicine has an ongoing collaboration with UCy, thanks to their similar mission, shared values and common ethos. This is the reason why they have chosen each other as a strategic partner. This is reflected in the signed MoU, based on which accredited laboratories and preclinical teaching facilities of the UCy will be used by the proposed branch. We fail to see how the proposed branch could dissolve the educational landscape. Apart from the UCy labs, the Branch does not aim to use any other resource or infrastructure that existing institutions use. It has built its own infrastructure, and will continue to do so, it will bring its own faculty, and will immediately recruit dedicated staff, and it will use its own research resources. In fact, the Branch aims to raise the standards in Medical Education and research, and encourage everyone in the field to evolve accordingly.
2. The University Hospital, as conceived by local authorities, will be run by the local government independently. The latter will certainly be fully responsible for deciding how beds and facilities will be utilized in terms of academic education. The branch will not, and in fact should not, have any authority on these decisions. Other Schools can follow the example of the NKUA School of Medicine, and discuss with the Cypriot Government, presenting their cases, and exploring potential participation. NKUA will support the project, but in no case will it patronize its operation. Therefore, it is entirely unclear why the regulation of the future University Hospital is included in this assessment. We respectfully believe that strong wording such as “must” is rather inappropriate in the context of the role of the evaluating committee.
3. We appreciate the concern of the committee. The timing of the evaluation was not in our hands and therefore it would be unfair to be used as a shortcoming. On the contrary, the School acted rapidly, prepared swiftly and thoroughly for this presentation in an extremely limited time, and expects to be assessed for the actual content of the application. We reiterate that policies, staff and pool of applicants are in place, therefore we stand our ground that despite time pressure, the Branch is ready to function in full.

With regards to the committee’s findings:

1. The NKUA School of Medicine is renowned for its extroversion and its international collaborations. As it was highlighted during the relevant presentations, the School has MoU with Schools and Hospitals all over the world and encourages student exchange in the context of European and International programs. Additionally, as an Institution that strongly supports biomedical research, it participates in international collaborations, as documented in the thousands of published multi-centered studies. The branch will be open to any suggestions for research collaboration with existing institutions. In fact, one of the main roles that it aims to fulfil is to introduce top-level research as argued by stakeholders. The expertise, the funding, and the network of the NKUA School of Medicine will certainly offer formidable incentive, for other Schools building their own research portfolio. We fail to understand how meaningful co-operation could represent a suggestion for improvement, not to mention a concern for the overall project. Additionally, it is very challenging for us to understand how potential impingement on clinical training capacity and existing research success could be applied through our project. Firstly, current clinical training and research activity of existing schools is minimal in terms of both quantity as well as variety, mainly due to the small number of patients treated. Secondly, throughout the proposal of our branch there was not a single hint that NKUA branch will utilize any of their resources (apart from UCy labs as per MOU, on which stakeholders and panelists of the

committee no less confirmed the capacity). Thirdly, as confirmed by students and stakeholders, over the past years, students from the existing institutions in Cyprus select Clinical Department of the NKUA School for their electives. We never considered that as impingement on the part of the existing schools, primarily because this is our ethos and secondly because of the premium clinical capacity of the School in Athens.

Moreover, we feel unsure as to what indicators could be used as evidence of co-operation, and it would be very useful to us if we could study what the three existing Schools have presented in this area.

In more detail:

a. Through careful evaluation of infrastructure, facilities, portfolios, mission and values, and academic orientation, the NKUA School of Medicine and the School of Medicine of the University of Cyprus (UCy), have chosen each other as a strategic partner. This is reflected in the MoU, based on which accredited laboratories and preclinical teaching facilities of the UCy will be used by the proposed branch.

b. We are confident that the NKUA Branch will contribute to the continuing raise of academic standards in Cyprus and improve the educational “ecosystem” in favor of students as well as the local and international medical community. Though, functioning in the same environment, and assuring ethical academic conduct, any competition is overseen, regulated and protected by local and European legislature. The magnitude of the NKUA School of Medicine should be regarded as motivation for further improvement in medical education and research. After all, offering prospective students the opportunity for high quality medical / clinical education, to the top standards that NKUA School of Medicine operates on for almost 200 years, should not be regarded as a threat for other Medical Schools or weakness/risk for the program itself, but should instead be welcomed and encouraged.

c. NKUA has already more than 800 cooperation agreements with Universities across 58 countries and is ready to collaborate in research and educational programs with other Institutions in Cyprus.

2. We would appreciate an explanation of what represents a risk, given that administrative procedures, staff, and pool of applicants are in place. Written confirmation by the NKUA regarding its commitment to providing clinical training in its facilities in Athens has been granted and is already available (please see, Annex 6 of the Medical School’s Response (Basic Medical Education) form)..

3. NKUA School of Medicine presented the rationale, arguments and strategic planning for suggesting a starting capacity of a minimum of 60 students.

i) The market gap, presented through numbers and charts, is in the range of several hundreds of students from Cyprus, Greece, and other countries where Greek speaking students aim for studies in Medicine. The expressed interest through emails and phone calls already surpasses the aimed number of admissions. Therefore, no concern about the ability to achieve the said number of admissions is justified.

ii) As was highlighted earlier in this response, the Faculty of the School has decades of experience in Medical Education, and has been running preclinical subjects for more than 300 students per semester. Therefore, their capacity to accommodate a minimum of 60 students is indisputable. In fact, original assessments defined that the Branch could easily accommodate a starting number of 100 students, but this was reduced to a minimum of 60 only to compensate for time restrictions, posed by the late evaluation.

iii) It is unclear as to which calculation could be implemented to differentiate between the needed infrastructure for teaching a minimum of 60 students versus 30 students. The lack of any relevant published data, studies or guidelines, render such a demarcation very subjective. Using the number of UCy students as a threshold seems extremely arbitrary. Should the committee present the algorithm based on which this suggestion was made, the School could certainly offer counter arguments, proving its adequacy for the proposed number of admissions.

iv) The suggestion for 30-40 admissions is an extreme one, given that no European School of Medicine currently admits less than 40 undergraduate students per year. Over previous decades, newly established English MD programs started with less than 40 admissions, but since mid-2010s, they have all gone above 60. Therefore, there is currently no business case in Europe with less than 40 admissions in a tuition fee-based program.

4. Capacity for clinical practice and education

i) Throughout the evaluation procedure, the NKUA School of Medicine presented in every detail the infrastructure for clinical practice and education. Plans are in place for cooperation with a fully functional private clinic (El Greco), that covers all primary and secondary medical specialties, with a currently available capacity of 60 beds, and planned expansion up to 100 beds within the following 2 years. The above have been confirmed by respective stakeholders during the relevant session. Additionally, an agreement has been made for collaboration with a new Hospital, building of which has already been approved, blueprints and relevant agreements were presented to the evaluation committee, and completion is anticipated prior to the first cohort of students reaching their clinical rota. Moreover, the leadership team of the NKUA are working closely with the Cypriot administration to materialize the project of a new, purpose-built University Hospital. This has been a chronic unmet social demand, and as explained by participating stakeholders, NKUA has the scientific and political leverage to mitigate challenges that have prevented previous attempts from finishing this project. The NKUA School of Medicine extends to 16 Hospitals in Athens, with 4 exclusively University Hospitals, which is a testament to its ability to establish and run a University Hospital, more than any other body that has been involved with the project in the past. As the stakeholders explained during the relevant session, collaboration with NKUA is Cyprus' best chance to materialize this project. Once completed, the University Hospital will comprise the main clinical campus of the proposed branch. Finally, the NKUA School of Medicine, with its 66 University Clinical Departments in Athens and over 3.300 beds, offers opportunities for clinical training that are considered unique, not only in the region, but also in the wider European area. These Departments have trained thousands of doctors over the past decades, who are praised worldwide for their clinical experience and expertise. The School includes 18 Centers of Clinical Excellence for rare diseases, that will be included as elective rotations in the proposed program, offering students exposure to diagnosis and treatment of rare conditions, to which they would otherwise have no access during their undergraduate studies. On a separate note, clinical exposure of students during their first and second year of studies, will be carried out using the facilities of the existing Hospital (El Greco), the capacity of which is considered adequate for the extent of clinical exposure 1st- and 2nd-year students need according to the curriculum, since most of their clinical practice is designed to be carried out through simulation, predominantly high-fidelity and virtual-reality simulation.

ii) The committee stressed that they have not inspected the aforementioned facilities. NKUA School of Medicine proposed to the committee visiting both the El Greco Hospital, as well as the Clinical Departments in Athens. It was argued that time constraints would not allow for this. The

School reiterates its proposal and invites the committee to inspect the sites at their convenience, within the context of the current assessment. The Leadership of the School appreciates that a visit on 16 Hospitals and almost 70 Departments overall could be a time-consuming exercise, but this is considered an actual argument in favor of the adequacy of the clinical capacity, lifting any concern that the committee might have. Moreover, the facilities of the School in Athens as well as implemented clinical curriculum have been approved repeatedly by the Hellenic Authority for Higher Education (HAHE), therefore no reasonable doubt pertains.

iii) In an extensive session with the Faculty of the School, it was made clear that there is a remarkably large pool of teaching personnel that can staff the proposed branch from day 0, and until permanent branch staff is recruited. Professors with decades of experience in medical education and research, as well as administration of University Departments are exactly what is missing from the current environment, and guarantee a seamless function of the proposed branch.

iv) The curriculum itself was explicitly presented both in written and through the delivered presentations. It is once again highlighted that this curriculum is accredited by HAHE, and has been running with appropriate updates and modifications for many decades, educating almost 400 students per year, during their clinical years.

v) It has to be underlined that the Cypriot Administration has passed a legislative act according to which admission of Cypriot students to Greek Universities as well as clinical training in the NKUA School of Medicine are officially recognized. It must be underlined that thousands of Cypriot students have been trained in the NKUA School of Medicine for more than one century, following competitive national (Pan-Cypriot) exams. The NKUA School of Medicine is today their top choice, and only those with highest grades achieve admission. Hence, studying in the NKUA School of Medicine is officially recognized by the Republic of Cyprus. In this context, and for the benefit of its students, by approval of the NKUA Senate, the Branch's program will also have access to the Athens' training infrastructure.

vi) There is now confirmation in written by the Cypriot Ministry of Health that there is an option for students of the Branch to receive clinical training in all public hospitals of Cyprus.

vii) For the above reasons it is extremely hard to see how the proposed branch falls short in comparison to existing Schools, where clinical education is performed in a small number of beds. These are actually the reasons why students from all over the southeastern Europe, including Cyprus, compete for attending their electives in the Clinical Departments of the NKUA School of Medicine. This is an undisputable "in-the-field" argument underpinning School's supremacy in clinical education.

5. Given that the main concern expressed is the inability to assess current clinical infrastructure, we once again highlight the vast capacity of the Athens' Hospitals, the readily available contingency in written with the parent institute, the HAHE accreditation of the program in Athens, as well as the option for prompt visit and evaluation of all clinical sites. The capacity in Athens is not a backup for a potential disadvantage; it is in fact a certain advantage for initial cohorts of students.

6. We are confident that such a statement to the students, though very easy to provide, is entirely superfluous, given that there is no reasonable chance of inability to offer the curriculum in full, as described above.

7. The NKUA branch School of Medicine is ready to offer the curriculum as presented above. Opportunities in Greece exist and will be used to enhance clinical exposure and depth of knowledge. NKUA has a long-standing immaculate track record of successful projects, thus we

feel there is no substance in preparing for a potential failure. With regards to the University Hospital, this is primarily a project of the local Government. NKUA will support the project with its paramount experience and socioeconomic leverage.


8. Finally, we sincerely welcome the positive comments made by the Regulated Professions Representative member of the EEC, according to whom *“The programme for NKUA Medical School Cyprus Branch meets the requirements for professional licensure in Cyprus. Consequently, the graduates of the said programme will be eligible for professional registration and licensure in Cyprus. I fully approve an initial cohort of 60 students for the NKUA Medical School Cyprus Branch.”*

Please find documents related to clinical training capacity in Annex 6 of the **Medical School’s Response** (Basic Medical Education) form.

We cordially thank the EEC for their support through the process, their insightful comments and their ongoing input.



C. Higher Education Institution academic representatives

<i>Name</i>	<i>Position</i>	<i>Signature</i>
PROFESSOR NIKOLAOS ARKADOPOULOS, MD, PhD	CHAIR, SCHOOL OF MEDICINE	

Date: 05/08/2025

