

Report of the Expert Panel on the reaccreditation of the University Postgraduate (Doctoral) Programme

Architecture and Urban Planning

Faculty of Architecture, University of Zagreb

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#### **INTRODUCTION**

The Expert Panel appointed by the Agency for Science and Higher Education (ASHE) created this Report on the Re-accreditation of the University Postgraduate (Doctoral) Programme *Architecture and Urban Planning* on the basis of the Self-Evaluation Report of the Programme, other documentation submitted and a visit to the Faculty of Architecture, University of Zagreb.

The Expert Panel regrets it did not find all appendices (which were mentioned in the list of appendices) in the files provided.

The Agency for Science and Higher Education (ASHE), a public body listed in EQAR (European Quality Assurance Register for Higher Education) and a full member of ENQA (European Association for Quality Assurance in Higher Education), re-accredits higher education institutions (hereinafter: HEIs) and their study programmes in line with the Act on Quality Assurance in Science and Higher Education (Official Gazette 45/09) and the Ordinance on the Content of a Licence and Conditions for Issuing a Licence for Performing Higher Education Activity, Carrying out a Study Programme and Re-Accreditation of Higher Education Institutions (OG 24/10). In this procedure parts of activities of higher education institutions and university postgraduate study programmes are re-accredited.

Expert Panel is appointed by the Agency's Accreditation Council, an independent expert body, to carry out independent evaluation of post-graduate university study programmes.

The Report contains the following elements:

- Short description of the study programme,
- The recommendation of the Expert Panel to the Agency's Accreditation Council,
- Recommendations for institutional improvement and measures to be implemented in the following period (and checked within a follow-up procedure),
- A brief analysis of the institutional advantages and disadvantages,
- A list of good practices found at the institution,
- Conclusions on compliance with the prescribed conditions of delivery of a study programme,
- Conclusions on compliance with the criteria for quality assessment.

#### Expert Panel

- Professor Christopher Kotsakis, Aristotle University of Thessaloniki, Greece,
- Professor Peter van Oosterom, Delft University of Technology, Netherlands,
- Iliana Tsali, doctoral candidate, University of Calgary, Canada,

- Professor Ashraf S. Ayoub, City University London, United Kingdom of Great Britain and Northern Ireland,
- Professor Hendrik Voll, Tallinn University of Technology, Estonia,
- Nicholas Lippiatt, doctoral candidate, KU Leuven, Belgium,
- Professor Elias Kassa, Norwegian University of Science and Technology (NTNU), Kingdom of Norway,
- Professor John Bridgeman, University of Birmingham, United Kingdom of Great Britain and Northern Ireland,
- Samer Sabry Fahmy Mehanny Gendy, doctoral candidate, City University London, United Kingdom of Great Britain and Northern Ireland,
- Professor Johan Verbeke, Aarhus School of Architecture, Denmark,
- Professor Elena Mussinelli, Politecnico di Milano, Italy,
- Professor Franklin van der Hoeven, Delft University of Technology, Netherlands,
- Teodora Iulia Constantinescu, doctoral candidate, Universiteit Hasselt, Belgium.

The higher education institution was visited by the following Expert Panel members:

- Prof dr. Johan Verbeke,
- Prof dr. Franklin van der Hoeven,
- Prof dr. Elena Mussinelli,
- Teodora Constantinescu, doctoral candidate.

In the analysis of the documentation, site visit and writing of the report the Panel was supported by:

- Marina Grubišić, coordinator, ASHE,
- Marko Hrvatin, interpreter at the site visit,
- Ivana Rončević, translator of the Report, ASHE.

During the visit to the Institution the Expert Panel held meetings with the representatives of the following groups:

- Management,
- Doctoral candidates,
- Teachers and supervisors,
- Alumni.

#### SHORT DESCRIPTION OF THE STUDY PROGRAMME

Name of the study programme contained in the licence: Architecture and Urban Planning Institution providing the programme: University of Zagreb Education provider(s): Faculty of Architecture Place of delivery: Zagreb Scientific area and field: Technical sciences / architecture and urban planning

Number of doctoral candidates: Y1-Y4: 64; withdrew: 7; in suspension: 11; received their doctoral degree: 15.

Number of teachers: 25

Number of supervisors: (active/potential): 16/62

# RECOMMENDATION BY THE EXPERT PANEL TO THE ASHE'S ACCREDITATION COUNCIL

The panel appreciates the open discussion and positive atmosphere during the visit to the Faculty of Architecture. Also the visit to the library, archive, offices and infrastructure was very much appreciated.

Upon the completion of the re-accreditation procedure and the examination of the materials submitted (Self-Evaluation Report etc.), the visit to the higher education institution and interviews with HEI members in accordance with the visit protocol, the Expert Panel renders its opinion in which it recommends to the Accreditation Council of the Agency the following:

Issue a letter of expectation for the period up to three (3) years in which the higher education institution should make the necessary improvements.

The Expert Panel suggests that a follow up monitoring meeting is scheduled in the not too far future, at the latest halfway to the next re-accreditation.

#### **RECOMMENDATIONS FOR THE IMPROVEMENT OF THE STUDY PROGRAMME**

- 1. The Faculty should develop a clear (long-term) vision of its PhD programme. This should include the choice for a comprehensive number of focus areas in which the Faculty can obtain international recognition.
- 2. The vision (Point 1) should be discussed and approved in all relevant Faculty committees/councils.
- 3. Joint supervision of two (or more) staff members for one PhD student starting their first year of PhD.
- 4. The Faculty should explore (international) funding for its programme.
- 5. The Faculty should drastically raise its international outlook and involvement.
- 6. The PhD programme could become the driver for the research of the Faculty.

#### ADVANTAGES OF THE STUDY PROGRAMME

- 1. PhD students have the opportunity to propose a project proposal on a topic of their own choice.
- 2. Faculty staff involved in the PhD programme are knowledgeable and internationally active.
- 3. The workshop type of activities in some of the courses is valued by the PhD students.

#### DISADVANTAGES OF THE STUDY PROGRAMME

- 1. Most students seem to finish their studies with substantial delays compared to the EC recommendation of three years for PhD studies. It is critical to create an environment and working methods to ensure the 3-year PhD programme allows a majority of PhD students to effectively complete the studies in three years.
- 2. It seems PhD students have a very limited possibility of obtaining (financial) support for international mobility and conference participation.
- 3. The architectural research community in Croatia seems to be limited and rather closed. It is recommended to open it up and invite international guest professors for contributions to the PhD programme.
- 4. PhD students are not very well informed about the selection criteria and processes.
- 5. The need to enrol the sufficient number of PhD candidates doesn't seem to allow selection based on content and quality. This seems to be at the root of mismatches between the theoretical/methodological backgrounds of supervisors and the topics that are addressed by the PhD candidates.
- 6. The selection criteria and processes on PhD course admission on the web site of the Faculty are published only in Croatian. They should also be published in English, to increase the participation of foreign candidates and improve PhD internalization.
- 7. The PhD programme does not run continuously and only runs every two or three years.

- 8. Very few of the PhD students receive salaries or financial support.
- 9. PhD students need to buy books and study material themselves.
- 10. PhD students should actively be stimulated to also publish in journals other than Prostor.
- 11. PhD students should actively be stimulated to take part in international conferences and workshops relevant to their research topic.

#### **EXAMPLES OF GOOD PRACTICE**

- 1. Some PhD students work very closely with their supervisors.
- 2. International collaborations with TU Vienna and TU Graz could be expanded to other European universities.
- 3. The working spaces and the environment are good.
- 4. The Expert Panel supports the idea of developing the PhD programme into a regional centre for PhD education. The Faculty should then look for funding and increasing the number of PhD students.
- 5. The Faculty's journal "Prostor" is listed in the Web of Science and is a key asset for collaborations with other faculties in Europe, which are actually in need of such a prestigious outlet.

## COMPLIANCE WITH THE PRESCRIBED CONDITIONS FOR THE DELIVERY OF A STUDY PROGRAMME

Minimal legal conditions:	YES/NO
	notes
1. Higher education institution (HEI) is listed in the Register of Scientific	
Organisations in the scientific area of the programme, and has a positive	
reaccreditation decision on performing higher education activities and	YES
scientific activity.	
2. HEI delivers programmes in the two cycles leading to the doctoral	
programme, i.e., first two cycles in the same area and field/fields (for	
interdisciplinary programmes), and employs a sufficient number of teachers	
as defined by Article 6 of the Ordinance on the Content of a Licence and	YES
Conditions for Issuing a Licence for Performing Higher Education Activity,	IES
Carrying out a Study Programme and Re-Accreditation of Higher Education	
Institutions (OG 24/10).	
3. HEI employs a sufficient number of researchers, as defined by Article 7 of	
the the Ordinance on Conditions for Issuing Licence for Scientific Activity,	YES
Conditions for Re-Accreditation of Scientific Organisations and Content of	IES
Licence (OG 83/2010).	VEC
4. At least 50% of teaching as expressed in norm-hours is delivered by	YES
teachers employed at the HEI (full-time, elected into scientific-teaching titles).	VEC
5. Student: teacher ratio at the HEI is below 30:1.	YES
6. HEI ensures that doctoral theses are public.	YES
7. HEI launches the procedure of revoking the academic title if it is	YES
determined that it has been attained contrary to the conditions stipulated for	
its attainment, by severe violation of the studying rules or based on a doctoral	
thesis (dissertation) that has proved to be a plagiarism or a forgery according	
to provisions of the statute or other enactments.	
Additional/ recommended conditions of the ASHE Accreditation Council	YES/NO
for passing a positive opinion	notes
1. HEI (or HEIs in joint programmes) has at least five teachers appointed to	YES
scientific-teaching titles in the field, or fields relevant for the programme	- 20
involved in its delivery.	
2. In the most recent reaccreditation, HEI had the standard Scientific and	YES
Professional Activity marked as at least "partly implemented" (3).	
3. The doctoral programme is aligned with the HEI's research strategy.	YES
4. The candidate : supervisor ratio at the HEI is not above 3:1.	YES
5. All supervisors meet the following conditions:	YES
a) PhD, elected into a scientific title, holds a scientific or a scientific-teaching	
position and/or has at least two years of postdoctoral research experience;	
b) active researcher in the scientific area of the programme, as evidenced by	
publications, participation in scientific conferences and/or projects in the	

past five years (table 2, Supervisors and candidates);		
c) confirms feasibility of the draft research plan upon admission of the		
candidate (or submission of the proposal);		
d) ensures the conditions (and funding) necessary to implement the		
candidate's research (in line with the draft research plan) as a research		
project leader, co-leader, participant, collaborator or in other ways;		
e) trained for the role before assuming it (through workshops, co-		
supervisions etc.);		
f) received a positive opinion of the HEI on previous supervisory work.		
6. All teachers meet the following conditions:	YES	
a) holds a scientific or a scientific-teaching position;		
b) active researcher, recognized in the field relevant for the course (table 1,		
Teachers).		
7. The supervisor normally does not participate in the assessment	YES	
committees.		
8. The programme ensures that all candidates spend at least three years doing	YES	
independent research (while studying, individually, within or outside		
courses), which includes writing the thesis, publishing, participating in		
international conferences, field work, attending courses relevant for research		
etc.		
9. For joint programmes and doctoral schools (at the university level):		
cooperation between HEIs is based on adequate contracts; joint programmes		
are delivered in cooperation with accredited HEIs; the HEI delivers the	N/A	
programme within a doctoral school in line with the regulations and ensures		
good coordination aimed at supporting the candidates;		
at least 80% of courses are delivered by teachers employed at HEIs within the		
consortium.		

### QUALITY ASSESSMENT

		Quality assessment ("high level of quality" or "improvements are necessary") and the explanation of the Expert Panel
	RESOURCES: TEACHERS, SUPERVISORS, RESEARCH CAPACITIES AND INFRASTRUCTURE	
1.1.	HEI is distinguished by its	Improvements are necessary.
	scientific/ artistic achievements in the discipline in which the doctoral study programme is delivered.	The Expert Panel could ascertain that staff members involved in the PhD programme are research active and publish regularly.
		There was not sufficient evidence to assess the achievements in an international perspective. It seems the achievements were made mostly at a regional level.
		Hence, the Expert Panel concludes to 'improvements needed'.
1.2.	The number and workload of	High level of quality
	teachers involved in the study programme ensure quality doctoral education.	The workload of teachers involved is reasonable and within the normal limitations.
1.3.	The teachers are highly qualified	Improvements are necessary.
	researchers who actively engage with the topics they teach, providing a quality doctoral programme.	The number of publications is reasonable, but the number of international conference and journal publications could be improved.
		Hence, the Expert Panel concludes to 'improvements needed'.
1.4.	The number of supervisors and their qualifications provide for quality in producing the doctoral thesis.	High level of quality
		The number of quality supervisors is within the 3:1 ratio and supervisory staff members are research active.
		However, completion rates should be drastically improved.
1.5.	The HEI has developed methods of assessing the qualifications and	High level of quality

	competencies of teachers and supervisors.	However, the mechanisms for assessing and monitoring the qualifications and competencies of teachers and supervisors could be more transparent.
1.6.	The HEI has access to high-quality resources for research, as required by the programme discipline.	Improvements are necessary.
		The library and the archive are available for PhD students and recently they also have gained access to international publication databases. However, the library has a rather limited archive and the online platform is not always fully functional.
		Hence, the Expert Panel concludes to 'improvements needed'.
	INTERNAL QUALITY ASSURANCE OF THE PROGRAMME	
		Improvements are necessary.
2.1.	The HEI has established and accepted effective procedures for proposing, approving and delivering doctoral education. The procedures include identification of scientific/ artistic, cultural, social and economic needs.	The PhD programme mostly connects to relevant topics which meet scientific, artistic, cultural, social, economic and other needs, although it seems there is no formal involvement of external key actors in establishing the programme. Hence, the Expert Panel concludes to 'improvements needed'.
2.2.	The programme is aligned with the	Improvements are necessary.
	HEI research mission and vision, i.e. research strategy.	As the research vision and strategy of the Faculty as well as the PhD programme are not fully explicit nor approved by relevant committees/councils, these should include a research focus, potentials and a link to the content offered in the PhD programme.
		Hence, the Expert Panel concludes to 'improvements needed'.
2.3.	The HEI systematically monitors	Improvements are necessary.
	the success of the programmes through periodic reviews, and implements improvements.	The Expert Panel was provided with one report (from several years ago). Hence it becomes clear there is no systematic monitoring, reviews or a transparent process of implementing improvements.

		needed'.
2.4.	HEI continuously monitors supervisors' performance and has mechanisms for evaluating supervisors, and, if necessary, changing them and mediating between the supervisors and the candidates.	Improvements are necessary. The assessment of supervision should be monitored in a systematic and transparent way. Questionnaires, focus group meetings, etc. could be helpful to improving the monitoring of the overall quality and developing aspects for improvement. The involvement of the PhD students as well as external actors is a crucial element. Hence, the Expert Panel concludes to 'improvements needed'.
2.5.	HEI assures academic integrity and freedom.	<b>Improvements are necessary.</b> There is no formal check on plagiarism. Hence, the Expert Panel concludes to 'improvements needed'.
2.6.	The process of developing and defending the thesis proposal is transparent and objective, and includes a public presentation.	<b>High level of quality.</b> The process of developing and defending the PhD thesis proposal is transparent and objective and includes a public presentation.
2.7.	Thesis assessment results from a scientifically sound assessment of an independent committee.	<b>High level of quality.</b> The thesis assessment results from a scientifically sound assessment of an independent committee.
2.8.	The HEI publishes all necessary information on the study programme, admissions, delivery and conditions for progression and completion, in accessible outlets and media.	<b>Improvements are necessary.</b> It seems all information is published and available, although the English version of the web site should be substantially improved to allow international visibility and attract more international PhD students. Hence, the Expert Panel concludes to 'improvements needed'.
2.9.	Funds collected for the needs of doctoral education are distributed transparently and in a way that ensures sustainability and further development of doctoral education (ensures that candidates' research	<b>Improvements are necessary.</b> The resources available for PhD students for travel expenses and developing their projects seem to be very limited. Moreover, there is a lack of transparency and clarity in the decision making process. Involving representatives of the PhD students may be a way to

is carried out and supported, so that doctoral education can be	
completed successfully).	There is a lack of funding for international mobility, especially for PhD students without grants.
	Hence, the Expert Panel concludes to 'improvements needed'.
2.10. Tuition fees are determined on the basis of transparent criteria (and real costs of studying).	
3. SUPPORT TO DOCTORAL CANDIDATES AND THEIR PROGRESSION	
3.1. The HEI establishes admission quotas with respect to its teaching and supervision capacities.	High level of quality.
3.2. The HEI establishes admission quotas on the basis of	High level of quality.
scientific/artistic, cultural, social, economic and other needs.	However, the Faculty should provide more information and data on this aspect.
3.3. The HEI establishes the admission quotas taking into account the	Improvements are necessary.
funding available to the candidates, that is, on the basis of the absorption	The underlying processes are not sufficiently clear and transparent.
potentials of research projects or other sources of funding.	Hence, the Expert Panel concludes to 'improvements needed'.
3.4. The HEI should pay attention to the number of candidates admitted as to	Improvements are necessary.
provide each with an advisor (a potential supervisor). From the point of admission to the end of doctoral education, efforts are invested so that each candidate has a sustainable research plan and is able to complete doctoral research successfully.	them to finish in a reasonable time span. The Expert Panel noted also that PhD students enrolled without a grant often went through the
	studies without a supervisor for a longer period. This phenomenon has to be monitored to assure equal

		opportunities for all PhD students.
		The Expert Panel concludes to 'improvements needed'.
3.5.	The HEI ensures that interested,	Improvements are necessary.
	talented and highly motivated candidates are recruited internationally.	The information of the PhD programme is not fully available in English and the number of international PhD candidates is extremely low. Efforts should be made to increase international visibility of the PhD programme, the assessment committees as well as the intake of international PhD students.
		Hence, the Expert Panel concludes to 'improvements needed'.
3.6.	The selection process is public and based on choosing the best applicants.	Improvements are necessary.
		It seems the PhD programme runs when a new full cohort of 15 PhD students is complete. There is no sufficient selection made towards the best applicants.
		Hence, the Expert Panel concludes to 'improvements needed'.
		Improvements are necessary.
3.7.	The HEI ensures that the selection procedure is transparent and in line with published criteria, and that there is a transparent complaints procedure.	Selection criteria are not sufficiently available (e.g. they are not available in English) and it is not sufficiently clear how the PhD programme is dealing with complaints. Hence, the Expert Panel concludes to 'improvements
		needed'.
3.8.	. There is a possibility to recognize applicants' and candidates' prior learning.	High level of quality.
		However, the Faculty should provide more information and data on this aspect.
3.9.	Candidates' rights and obligations are defined in relevant HEI regulations and a contract on studying that provides for a high level of supervisory and institutional	<b>High level of quality.</b> The Expert Panel notices there are very few funds available for supporting PhD students in their activities.

support to the candidates.	
3.10. There are institutional support mechanisms for candidates' successful progression.	Improvements are necessary. The completion rate for PhD students is very low and therefore improvements should be done in relation to the support to and the follow up on PhD students' progression. Hence, the Expert Panel concludes to 'improvements needed'.
4. PROGRAMME AND OUTCOMES	
4.1. The content and quality of the doctoral programme are aligned with internationally recognized standards.	<ul> <li>Improvements are necessary.</li> <li>The provided documents do not include an explanation on methods and procedures of meeting international standards of doctoral education by comparing the programme to those of international HEIs related to the list of aspects mentioned.</li> <li>Three aspects are essential benchmarks to consider at this point: <ul> <li>Duration of the PhD programme,</li> <li>Success rate,</li> <li>Percentage of foreign PhD candidates.</li> </ul> </li> <li>Hence, the Expert Panel concludes to 'improvements needed'.</li> </ul>
4.2. Programme learning outcomes, as well as the learning outcomes of modules and subject units, are aligned with the level 8.2 of the CroQF. They clearly describe the competencies the candidates will develop during the doctoral programme, including the ethical requirements of doing research.	Improvements are necessary. Descriptions are available but can be improved upon. Hence, the Expert Panel concludes to 'improvements needed'.
4.3. Programme learning outcomes are logically and clearly connected with teaching contents, as well as the contents included in supervision and	<b>Improvements are necessary.</b> Individual courses do not form a coherent programme within a clearly articulated vision and learning

research.	objectives.
	The Expert Panel advises to develop specific areas of interest with sufficient critical mass and cohesion.
	Hence, the Expert Panel concludes to 'improvements needed'.
4.4. The doctoral programme ensures the achievement of learning outcomes and competencies aligned with the level 8.2 of the CroQF.	<b>Improvements are necessary.</b> Descriptions are available but can be improved upon. Hence, the Expert Panel concludes to 'improvements needed'.
4.5. Teaching methods (and ECTS, if applicable) are appropriate for level 8.2 of the CroQF and assure achievement of clearly defined learning outcomes.	<b>Improvements are necessary.</b> Descriptions are available but can be improved upon. Hence, the Expert Panel concludes to 'improvements needed'.
4.6. The programme enables acquisition of general (transferable) skills.	High level of quality.
4.7. Teaching content is adapted to the needs of current and future research and candidates' training (individual course plans, generic skills etc.).	<b>Improvements are necessary.</b> Interviews with the PhD candidates indicated that this is not (always) the case. Improvements needed.
4.8. The programme ensures quality through international connections and teacher and candidate mobility.	Improvements are necessary. A few international collaborations are in place. The programme should use these experiences to build a wider and stronger international collaboration network. The Faculty needs to focus on Erasmus + programme in this case. Hence, the Expert Panel concludes to 'improvements needed'.

### \* NOTE: RECOMMENDATIONS OF THE EXPERT PANEL TO THE ASHE'S ACCREDITATION COUNCIL AND QUALITY LABEL

The role of the Expert Panel in the re-accreditation of doctoral study programmes is manifold. The Expert Panel or part of the Expert Panel visiting a higher education institution drafts a report on the basis of a self-evaluation report, the accompanying relevant documentation, and a site visit to HEI. The draft report is adopted by all members of the Cluster Expert Panel, while the president of the Cluster Expert Panel is responsible for coordinating the assessment levels.

The report contains an assessment on whether a doctoral study programme delivered at a higher education institution complies with the prescribed laws and by-laws, as well as any additional/recommended requirements defined by the Agency's Accreditation Council, and whether a higher education institution can obtain a positive, i.e. satisfactory quality assessment according to the criteria set out in this document. Moreover, the Expert Panel must make recommendations for quality improvement.

Based on the assessment of all these elements, the Expert Panel may propose to the Accreditation Council of the Agency to issue either a confirmation on compliance, a letter of expectation for the period up to three (3) years in which period the higher education institution should eliminate the identified deficiencies, or to deny the license.

If the Expert Panel has assessed that a doctoral study programme delivered by a higher education institution does not meet legal and other requirements or that the quality of a study programme is not ensured (i.e. that HEI does not meet additional requirements or recommendations made by the Accreditation Council, or has a very poor quality assessment), they should propose to the Accreditation Council to deny the license.

If the Expert Panel considers that the relevant laws and bylaws have been met by a higher education institution, but that certain elements mentioned above do not meet the quality requirements, while they consider that the identified shortcomings can be corrected within a time frame of three years, they should issue a letter of expectation.

If the Expert Panel considers that all legal and additional/recommended requirements have been met and the quality assessment is satisfactory, i.e. that a study programme fulfils the learning outcomes appropriately defined for that level and scientific area, they may propose the issuance of a certificate and have a HEI commit to quality improvement and reporting to the Agency during the follow-up period.

Finally, if the Expert Panel has, in accordance with the criteria mentioned above, proposed issuing the certificate of compliance and assessed that, in addition to meeting the minimum quality requirements – i.e. the qualification framework level - for a study programme, the programme should be identified as a doctoral programme of a 'high level of quality', the Expert Panel may propose to the Agency's Accreditation Council that such a doctoral study programme be awarded the 'high quality label'. Thus the Agency, with the consent of the

Accreditation Council, grants a higher education institution the right to use the label for their academic and promotional purposes.

The 'high quality label' cannot be proposed or awarded to a programme or a higher education institution that does not comply with the requirements laid down by the laws and bylaws mentioned in this document, and any additional requirements recommended by the Accreditation Council. Moreover, the quality assessment awarded to a study programme should reflect a high level of quality inasmuch that at least half of the sub-criteria in each of the quality assessment criteria are assessed as being of high quality. The Accreditation Council of the Agency issues a final opinion on the label awarded. The content and form of the quality labels shall be prescribed by the Agency in a relevant general act.

The Accreditation Council of the Agency discusses the final report with all recommendations and suggestions, and issues their opinion on the report. Based on a prior opinion of the Accreditation Council, the Agency issues an Accreditation Recommendation to the minister responsible for science and higher education, and upon receipt of the minister's final decision on the outcome of the procedure, awards the 'high quality label" to a higher education institution.