

ENQA TARGETED REVIEW

DANISH ACCREDITATION COUNCIL (DAC)

SIMONA LACHE, LUNA LEE SOLHEIM,
RONNY HEINTZE, DAMIR SOLAK

22 APRIL 2026

CONTENTS

CONTENTS	1
EXECUTIVE SUMMARY.....	3
INTRODUCTION.....	5
BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS	5
BACKGROUND OF THE REVIEW	5
SCOPE OF THE REVIEW	5
MAIN FINDINGS OF THE 2021 REVIEW	6
REVIEW PROCESS.....	7
CHANGES WITHIN THE AGENCY	9
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM	9
DAC'S ORGANISATION/STRUCTURE.....	11
DAC'S FUNDING	13
DAC'S FUNCTIONS, ACTIVITIES, PROCEDURES	13
FINDINGS: COMPLIANCE OF DAC WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW	14
ESG PART 3: QUALITY ASSURANCE AGENCIES	14
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE.....	14
ESG 3.3 INDEPENDENCE.....	19
ESG 3.5 RESOURCES	22
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	25
ESG PART 2: EXTERNAL QUALITY ASSURANCE	28
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE.....	28
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	33
ESG 2.7 COMPLAINTS AND APPEALS.....	35
ENHANCEMENT AREAS.....	39
ESG 3.4 THEMATIC ANALYSIS	39
CONCLUSION.....	44
SUMMARY OF COMMENDATIONS.....	44
OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS	44
SUGGESTIONS FOR FURTHER IMPROVEMENT	44

ANNEXES.....	45
ANNEX 1: PROGRAMME OF THE SITE VISIT	45
ANNEX 2: TERMS OF REFERENCE OF THE REVIEW	53
ANNEX 3: GLOSSARY	61
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW	62
DOCUMENTS PROVIDED BY DAC.....	62
OTHER SOURCES USED BY THE REVIEW PANEL	63

EXECUTIVE SUMMARY

The Danish Accreditation Council – DAC (formerly the Danish Accreditation Institution - AI) is reviewed against the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG 2015). This report is based on the *European Association for Quality Assurance in Higher Education* (ENQA) targeted review, following the methodology described in the *Guidelines for ENQA Targeted Review* and considering the *Use and Interpretation of the ESG* by the EQAR's Register Committee. The purpose of this review is to renew the agency's registration on the European Quality Assurance Register for Higher Education (EQAR), and to renew the agency's membership in ENQA.

The targeted review was conducted from July 2025 to April 2026, and included a site visit by the review panel on 8 – 10 December 2025.

DAC (formerly Danish Accreditation Institution - AI) was established by law in 2007 and has undergone three full reviews by ENQA – in 2013, 2016, and 2021. An amendment to the Accreditation Act was adopted on 20 May 2025, following changes in the organisation of the agency which came into force on 1 July 2025. DAC remains the sole authority in Denmark responsible for the external quality assurance of higher education. In accordance with the Accreditation Act, DAC contributes to safeguarding and enhancing the quality of Danish higher education by accreditation of higher education institutions and, to a limited extent, individual existing programmes or new programmes that the institution wishes to establish. The amendment of the Accreditation Act does not change the agency's main purpose, which is external quality assurance of higher education in Denmark. The basic model of accreditation and the methodology for accreditation in Denmark remain the same. The independence of the agency and its decision-making is clearly defined in the Accreditation Act. The amendment implies that a new Secretariat is established and organisationally situated within the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science). The Secretariat is considered part of the Accreditation Council when carrying out its accreditation tasks, and the amendment to the Accreditation Act stipulates that the Secretariat is to act with full independence from the Ministry of Higher Education and Science and other stakeholders in accreditation activities.

Based on the Terms of Reference for this targeted review, the panel analysed the activity related to higher education falling under the scope of the ESG: Institutional Accreditation (IA), Programme accreditation (PA), and Institutional Accreditation for Institutions of Arts and Culture.

The ESG addressed in this targeted review are ESG 2.1 Consideration of internal quality assurance, 2.7 Complaints and Appeals, ESG 3.1 Activities, policy and processes for quality assurance, and ESG 3.6 Internal quality assurance and professional conduct, in which 2.7, 3.1, 3.6 were found partially compliant at the last EQAR Register Committee's renewal decision. ESG 3.3 Independence and 3.5 Resources were standards under EQAR's attention due to substantive changes in the agency's organisation and amendments to the Danish Accreditation Act. ESG 3.4 Thematic Analysis is addressed in the report as an enhancement area selected by DAC. Regarding other matters related to ESG compliance that came up during the targeted review, the panel was informed about the new guidelines for Institutional Accreditation of Institutions of Arts and Culture 2.0 and decided to include ESG 2.2 Designing methodologies fit for purpose, to ensure that this development was also considered by this targeted review.

The panel considered the evidence given in the SAR, additional evidence requested by the panel and provided by the agency (full list in Annex 4), and supplementary information from the site visit, which included meetings with a wide range of participants. The panel analysed and discussed the

evidence and concluded that DAC complies with the ESG as presented in the table below. Since the last ENQA review, the agency has made progress on ESG 2.7, 3.1, and 3.6, which were previously found partially compliant in the last EQAR Register Committee decision on the renewal of their inclusion on the Register.

The agency's choice of ESG 3.4 Thematic Analysis as enhancement standard reflects both the maturity of the agency's core external quality assurance (EQA) activities and its ambition to further strengthen its system-level contribution to quality development in Danish higher education and society at large. The workshop confirmed a shared understanding among stakeholders that thematic analysis can become a high-impact, low-burden instrument for system-level learning, provided it is strategically focused, methodologically pragmatic, and communicatively agile. The agency is encouraged to view thematic analysis not as an additional task, but as a connecting function, linking evidence, dialogue, and enhancement across its quality assurance activities and the broader Danish higher education ecosystem. Based on the review process and the outcomes of the enhancement workshop, the panel formulated a set of suggestions for the Danish Accreditation Council.

Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review ¹	Compliance transferred from the last full review ²
2.1	Compliant	N/A
2.2	Compliant	N/A
2.3	N/A	Substantially compliant → Compliant
2.4	N/A	Fully compliant → Compliant
2.5	N/A	Substantially compliant → Compliant
2.6	N/A	Substantially compliant → Compliant
2.7	Compliant	N/A
3.1	Compliant	N/A
3.2	N/A	Fully compliant → Compliant
3.3	Compliant	N/A
3.4	N/A	Fully compliant → Compliant
3.5	Compliant	N/A
3.6	Compliant	N/A
3.7	N/A	Fully compliant → Compliant

The review panel found DAC to be compliant with the ESG.

¹ Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

² Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

INTRODUCTION

This report analyses the compliance of Danish Accreditation Council (Akkrediteringsrådet), DAC (formerly Danish Accreditation Institution - AI), with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in July 2025 until April 2026 and should be read together with the external review report of the agency's last full review against the ESG.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

As DAC has undergone three successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR, and on standards that could have been affected by substantive changes³ during the past five years while at the same time further strengthening the enhancement part of the review.

SCOPE OF THE REVIEW

DAC is carrying out the following activities within the scope of the ESG:

- Institutional Accreditation (IA)
- Programme accreditation (PA)
- Institutional Accreditation for Institutions of Arts and Culture

The following activities are outside the scope of the ESG:

- SU Vurderinger⁴
- Niveau vurderinger⁵
- Assessment of providers of mandatory working environment courses

The review will evaluate the extent to which DAC continues to fulfil the requirements of the ESG. The targeted review aims to focus on those parts that require attention and provide sufficient information to support DAC's application to EQAR. The review will be further used as part of the agency's renewal of membership in ENQA.

³ e.g. organisational changes, the launch of new external QA activities.

⁴ Assessments of a limited number of private programmes, leading to no formal degree, that qualify for State Educational grant

⁵ Assessments of the qualification level of some private programmes in relation to the national qualifications' framework

Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

a. ESG 2.7 – Complaints and Appeals

- Whether the agency has formal internal mechanisms for handling complaints and appeals.

b. ESG 3.1 – Activities, policy and processes for quality assurance

- Whether the agency has started involving stakeholders (and students) in a meaningful way in its governance.

c. ESG 3.6 – Internal quality assurance and professional conduct

- Whether the agency has developed more systemic and better structured management of its internal QA processes.

B) Standards 2.1 to 2.7 for the following activities:

a. n/a

C) Standards affected by other types of substantive changes:

a. ESG 3.3 – Independence

- Whether the recent changes have affected the agency's organisational and operational independence.

b. ESG 3.5 – Resources

- Whether the agency still has adequate and appropriate resources, both human and financial, to carry out its work.

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.4 Thematic Analysis

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

- During the site visit and assessment of ESG 2.1, the panel became aware that in August 2025, a new Executive Order on the Accreditation of Higher Education Institutions and Approval of New Higher Education Programmes under the Ministry of Culture replaced the former Executive Order of 6 April 2016. In connection with this, new guidelines for arts and culture institutions were published, which differed from the ordinary IA guidelines. Accordingly, the review panel decided to include ESG 2.2 in the terms of reference concerning the new guidelines for Institutional Accreditation for Institutions of Arts and Culture (IA 2.0), to ensure that these recent developments were also covered by the scope of this targeted review.

MAIN FINDINGS OF THE 2021 REVIEW

DAC's last review against the ESG took place in 2021. The review panel from that year determined that the agency was fully compliant with five standards and substantially compliant with 9 standards.

Following the renewal decision by the EQAR Register Committee on 15 October 2021, the agency's compliance with 11 standards and partial compliance with three standards were determined, Table I.

Table I. Compliance with the ESG 2021 review

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Substantial compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Full compliance	Compliance
2.5	Substantial compliance	Compliance
2.6	Substantial compliance	Compliance
2.7	Substantial compliance	Partial compliance
3.1	Substantial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Full compliance	Compliance
3.5	Full compliance	Compliance
3.6	Substantial compliance	Partial compliance
3.7	(not expected)	Compliance (by virtue of applying)

REVIEW PROCESS

The 2025 external targeted review of the Danish Accreditation Council was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of the Danish Accreditation Council was appointed by ENQA and composed of the following members:

- Simona Lache (Chair), Professor, Ph.D. Supervisor/ Vice-Rector for Internationalisation and Quality Evaluation, Transilvania University of Brasov, Romania (EUA nominee);
- Luna Lee Solheim (Secretary), Senior Adviser at Department of Higher Education, Norwegian Agency for Quality Assurance in Education (NOKUT), Norway (ENQA nominee);
- Ronny Heintze, Deputy Director for International Development, Agency for Quality Assurance through Accreditation of Study Programmes (AQAS), Germany (ENQA nominee);
- Damir Solak, Ph.D. student in Public Law Studies, Masaryk University, Czech Republic (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool)

Alexis Fábregas Almirall (Project and Reviews Officer) acted as the review coordinator. The panel wishes to express their gratitude to Alexis Fábregas Almirall for his expertise and valuable support throughout the review process.

Self-assessment report

The preparation of this Self-Assessment Report (SAR) was undertaken by a dedicated project team within the Secretariat. Formal responsibility for the project rested with the Head of Secretariat, who maintained ongoing communication with the project team throughout the development process. This continuous dialogue ensured the content of the SAR was thoroughly discussed and carefully considered at each stage.

The project team comprised three key members: a senior advisor on accreditation, an accreditation consultant, and a senior advisor who also serves as secretary to the Accreditation Council. Notably, these same individuals were responsible for authoring the follow-up report that was submitted to the ENQA Board in 2023, after the ENQA Agency Review conducted in 2021.

The preparation of this SAR included the following key steps:

1. November 2024, the project team began preparation for the SAR. The focus was on how to document progress regarding the ESG standards, which were assessed to be partially compliant in the Register Committee's latest renewal decision. Staff members were engaged in discussions related to these standards.
2. Early March 2025, the team started addressing ESG standards likely to be impacted by an anticipated amendment to the Danish Accreditation Act. There were many internal meetings in autumn 2024 and spring 2025 to clarify the consequences of the changes, and how to best proceed.
3. In March 2025, ENQA and EQAR confirmed that the agency was eligible for a targeted review, and the Terms of Reference were subsequently drawn up..
4. May and June 2025, the project team gathered input for the SWOT analysis from the Accreditation Council, Secretariat staff, and a series of stakeholders, including HEIs and students' representatives.
5. June 2025, parts of the SAR related to the recent amendments to the Accreditation Act and changes in the higher education system in Denmark were fact-checked by the Danish Agency for Higher Education and Science. This was to ensure the same understanding of the Accreditation Act in areas where changes have occurred, as well as of the upcoming reforms to the higher education system.
6. Late August 2025, the chair and the vice-chair of the Accreditation Council formally approved the SAR on behalf of the Council.

The panel found the SAR informative and useful for the review panel. The SAR covered all the focus areas in accordance with the ToR of the targeted review. However, since the change in the organisation happened in June 2025, just shortly before the SAR was finalised, additional information and documentation was requested and provided by DAC. In addition, the review panel gathered further insight and clarification of various details from the meetings with the agency and stakeholders during the site visit.

Site visit

The site visit took place from 8 to 10 December 2025. The meetings on 8 December were held at DAC's premises in Holbæk, while those on 9 and 10 December were held in Copenhagen. Most meetings were in person, three were online, and one was hybrid. The review panel was informed, and an agreement was reached between the review panel and the agency before the site visit on which meetings would be held online.

On 8 December, the review panel had meetings with:

- The Chair of DAC and the Head of the Secretariat (in person);
- Staff of the agency (in person);
- Administrative staff (hybrid);
- Council members (online).

On 9 December, the review panel had meetings with:

- The agency's resource person, clarification meeting regarding Institutional Accreditation for Institutions of Arts and Culture, under the Ministry of Culture (in person);
- Students (online);
- Ministry representatives (in person);
- QA officers of HEIs (in person);
- Heads/ representatives of reviewed HEIs (in person);
- Stakeholders (in person);
- Representatives of the reviewer's pool (online);
- DAC's staff members, HEIs and other stakeholders on the agency's self-selected enhancement area ESG 3.4 (in the form of a workshop);
- Session to further investigate accreditation activities regarding HEIs of arts and culture, under the Ministry of Culture, and the agency's compliance with ESG 2.1 and ESG 2.2 (in person).

On 10 December, the review panel had meetings with:

- Chair of DAC and the Head of the Secretariat to clarify any pending issues (in person);
- Chair of DAC, Head of Secretariat, and DAC staff for the final de-briefing meeting and to inform about preliminary findings (in person).

The site visit was well organised, and the panel would like to thank DAC for its practical support. The DAC resource person and the agency's staff demonstrated significant professionalism during the entire process and provided necessary assistance to the panel regarding all matters. The meetings were conducted in an open way, and the panel was able to get a clear picture of the agency and its work to reach their conclusions. The panel would especially thank everyone who participated in the workshop for their discussions and contributions.

CHANGES WITHIN THE AGENCY

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

1. Higher education offered by the universities

In 2023, a reform on university education was passed in the Parliament supplementing the current two-years master's degree programme. There will be two new programmes; a master's degree of one year and three months programme, and a flexible master's degree for working professionals,

which implies that the student studies while simultaneously working in a private or public enterprise for all or parts of the programme. The new master's degree programmes will be developed by the eight universities, which currently all have a positive accreditation status, and will be approved by the Minister for Higher Education and Science continuously from 2025 to 2031.

Admissions to universities' bachelor's programmes will be reduced by 10%. This takes into account demographic development and, partly, aims to ensure that more people will apply for professional bachelor's programmes and academy profession programmes.

2. Higher education offered by the university colleges and business academies

In March 2025, the Danish Parliament agreed on a reform of the professional bachelor's programmes and the academy profession programmes. It entails allocating almost two billion Danish Kroner annually to a comprehensive improvement in the quality of these programmes. The reform included:

- that four to six new practice-oriented professional master's programmes will be established in the welfare-oriented area;
- the professional bachelor's programmes will be organized with 15 fewer ECTS compared to today;
- the top-up bachelor programmes for students who have passed an academy profession programme will be phased out;
- academy profession graduates and professional bachelor's graduates will be given new opportunities for free practice-oriented further education.

3. Higher Education Institutions of Arts and Culture under the Ministry of Culture

A new ministerial order, *Executive Order on the Accreditation of Higher Education Institutions and Approval of New Higher Education Programmes under the Ministry of Culture*, was published in 2025 and replaced the former ministerial order from 2016. In connection with this, new guidelines for the institutions of arts and culture were published. There are seven institutions of arts under the Ministry of Culture: National Film School of Denmark (Den Danske Filmskole), The Danish National School of Performing Arts (Den Danske Scenekunstskole), The Royal Academy of Music (Det Jyske Musikkonservatorium), The Royal Danish Academy of Fine Arts (Det Kongelige Danske Kunstakademis Billedkunstskoler), The Royal Danish Academy of Music (Det Kongelige Danske Musikkonservatorium), Rhythmic Music Conservatory (Rytmsk Musikkonservatorium) and Danish National Academy of Music (Syddansk Musikkonservatorium).

4. Changes in the Danish accreditation system

The Danish Parliament adopted an amendment to the Accreditation Act (SAR annex 3 and 4), which entered into force on 1 July 2025.

The amendment of the Accreditation Act followed an announcement by the Danish government in 2024 that a general reduction in current public spending was necessary to prioritize new public expenses, including welfare activities close to the citizens. To cut actual spending, a broadly targeted reduction of one thousand employees working in national public entities was launched. The cut affected areas within supervision, accreditation, and evaluation. Following this, the number of employees in the then AI was reduced. This reduction should also be seen in the light of the experience from the second cycle of institutional accreditation, which is that today the HEIs have well-established quality assurance systems.

The amendment of the Accreditation Act does not change the basic model for accreditation in Denmark, which is based on institutional accreditation. This means that HEIs and their programmes are still accredited and decisions on accreditation are, as before, made by the Council. The method and criteria employed in the accreditation process also remain the same.

- Establishment of a new Secretariat to succeed the Danish Accreditation Institution

Under the amended Accreditation Act, the Danish Accreditation Institution (AI) was closed with effect from 1 July 2025. The amendment implies that a new Secretariat is established and organisationally situated within the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science), and is considered part of the Accreditation Council when carrying out its tasks within accreditation. It is further stipulated in the amendment to the Accreditation Act that the Secretariat is to act with full independence of the Ministry of Higher Education and Science and other stakeholders in accreditation activities and in accordance with international requirements.

The previous dual accreditation system, consisting of the Council and AI, has become one single common authority, namely the Danish Accreditation Council (DAC).

- Composition of the Council

Under the amendment to the Accreditation Act, the number of ordinary members of the Council is reduced from eight to seven, and this will be implemented after the end of the term of the current Council members on 31 December 2025. The new Council consists of a chairperson and seven ordinary Council members, one of whom must have international accreditation experience.

- Extension of the period for a positive institutional accreditation

With the amendment to the Accreditation Act, the accreditation period for institutions that have achieved two positive institutional accreditations (i.e., institutions having completed the first and second cycles of institutional accreditation) is extended from six to eight years. This will also apply retroactively to HEIs that have achieved two positive institutional accreditations before 1 July 2025, when the amendment to the Accreditation Act entered into force.

Following the public consultation on the bill amending the Accreditation Act, the Ministry of Higher Education and Science prepared a memorandum summarizing the responses. The Ministry noted that relevant organisations, including the Council, had proposed a mid-term activity during the new eight-year accreditation period, and that consideration of this could be included in future work to develop a new, adjusted accreditation concept. No work has yet begun on developing a mid-term activity.

DAC'S ORGANISATION/STRUCTURE

The amendment to the Accreditation Act entailed the following main changes in DAC's organisation and structure:

- I. Establishment of a new Secretariat to succeed the Danish Accreditation Institution

The new Secretariat was established and organisationally situated within the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science).

The Secretariat is considered part of the Accreditation Council when carrying out its tasks within accreditation. It is further stipulated in the amendment to the Accreditation Act that the Secretariat is to act with full independence of the Ministry of Higher Education and Science and other stakeholders in accreditation activities and in accordance with international requirements.

Figure 1 shows the flow chart of the new organisation, which was provided by the agency upon request from the review panel.

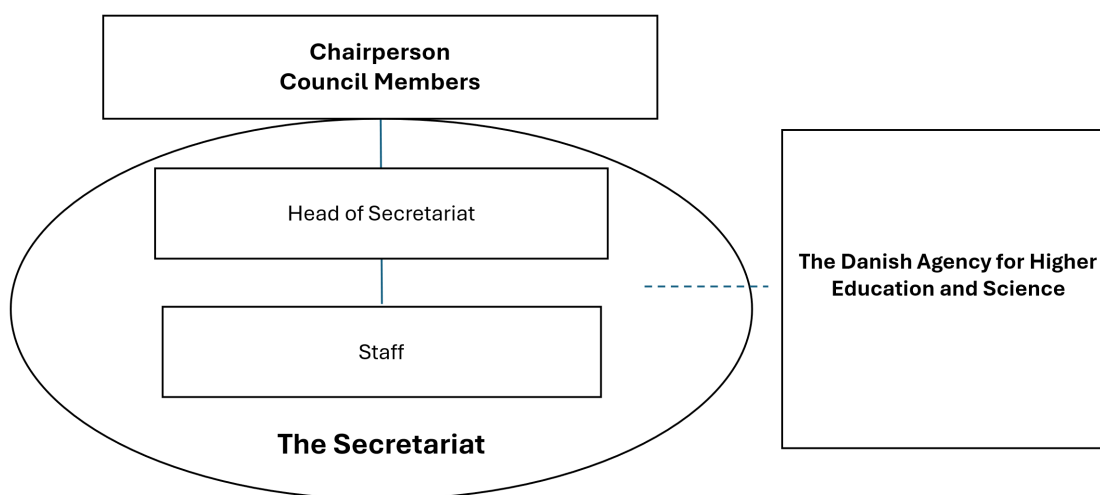


Figure 1. DAC flow chart, illustrating the organisation structure

Under the amended Accreditation Act, the Secretariat continues AI's task of planning and executing assessment activities and preparing accreditation reports for use in the Council's decisions on accreditation of HEIs and their programmes. The Secretariat also continues AI's task of gathering national and international experience of importance for accreditation.

In addition, it follows from the amendment to the Accreditation Act that the Secretariat, just like AI did, must meet international accreditation standards, i.e., the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

2. Composition of the Council

The new Council will now consist of a chairperson and seven ordinary Council members. One of the Council members must have international accreditation experience. The chairperson and the Council members are formally appointed by the Minister for Higher Education and Science. However, to underscore the independence of the Council, the amendment states that three members shall be appointed on the recommendation of relevant organisations, including labour market organisations and HEIs. Further, two members are appointed on the recommendation of the student representatives on the boards of HEIs. The chairperson and the Council members can serve on the Council for a maximum of eight years, divided into at least two terms of appointment. The student representatives can serve on the Council for a maximum of three years, divided into at least two terms of appointment.

3. Staff of the Secretariat

As part of this reprioritisation, the then AI was reduced from some 33 to approximately 15 full-time employees as of 31 May 2025. The long period of notice given facilitated a gradual transformation of AI into the new Secretariat.

All but one employee in the new Secretariat were previously employed at AI, and the Head of Secretariat is the former director of AI. With a focus on retaining staff involved in the core activity, the key change was the exclusion of AI administrative and technical support staff from the new Secretariat. Instead, administrative and technical support staff are employed in the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science) and will provide services and support to the Secretariat.

The new Secretariat is composed of one Head of Secretariat, and a staff of eight senior advisors, one special advisor, five heads of sections, and one part-time student assistant.

DAC'S FUNDING

From the previous review of the agency in 2021, the agency had a budget of 32.8 million Danish Kroner in 2020. The SAR does not provide information from previous years, but after a request, the panel has been provided with the information that the funding for 2025 was 3,2 million Euro (23.8 million Danish Kroner). As a result of the change of organisation, there has been a significant change in the agency funding for 2026 with a reduction to approximately 1,8 million Euro (13,5 million Danish Kroner) in 2026 according to the SAR. According to the SAR, the reduction of the funding is also a result of a general budget reduction across the entire Danish central government administration.

DAC'S FUNCTIONS, ACTIVITIES, PROCEDURES

The agency's functions, activities, and procedures are implemented as described in the 2021 ENQA review report. It is stated in the ToR that institutional accreditation (IA), programme accreditation (PA), and Institutional Accreditation for Institutions of Arts and Culture are the only external quality assurance activities conducted by the agency within the scope of the ESG.

FINDINGS: COMPLIANCE OF DAC WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2021 review recommendation

ENQA Agency Review Report (substantial compliance)

The panel recommends the agency to address the peculiarities of the dual accreditation system, namely by reflecting on how to consolidate the interdependence of the relationship between AI and the AC.

The panel also recommends the agency to consider the establishment of an Advisory Body or similar that could institutionalize and strengthen the dialogue with the relevant stakeholders, namely with the MHES, the AC and with HEIs.

EQAR Register Committee decision (partial compliance)

While the Committee was able to understand the distinction between agency's activities, it found that the involvement of stakeholders in the governance of the agency remains insufficient given the unchanged structure. The Register Committee was therefore unable to concur with the panel but upheld the partial compliance judgement on the standard.

Terms of Reference - Focus areas A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision

Whether the agency has started involving stakeholders (and students) in a meaningful way in its governance.

Evidence

The Accreditation Act defines the function and activities of DAC. According to the SAR, the agency's mission is to create value to society through a strong commitment to the task of enhancing the quality and relevance of higher education. The agency's mission is accomplished through their accreditation activities, mainly institutional accreditation, that:

- identify concrete issues with the quality assurance work;
- provide knowledge and incentives to improve quality;

- inspire the continued development of institutions and the entire higher education sector.

The DAC undertakes external quality assurance activities and regularly conducts institutional accreditation of higher education institutions every six years. With the amendments to the law (Act Amending Section 9 of the Act on Accreditation of Higher Education Institutions), this will change to eight years for institutions having received positive accreditations in the first and second cycle of institutional accreditation. As shown in Table 3, from 2021 to 2025, DAC has made accreditation decisions for 35 institutions, and the Council has made five programme accreditation decisions.

Table 3. The Accreditation Council's decisions in the period 2021 – 2025

	2021	2022	2023	2024	2025	Total
Institutional Accreditation	8	10	5	6	6	35
Programme Accreditation	-	2	1	2	-	5

Table 4. Institutional Accreditation plans for 2026 and 2027

	2026	2027
Institutional Accreditation (2.0)	3	3*

* One additional third-cycle IA is planned with start-up in late 2027.

In the period 2021 to 2025, the SAR shows that the Council has made 30 positive accreditation decisions, two conditional accreditation decisions, and three refusals of accreditation. The reports and decisions are published on the agency's website⁶.

Following the agency's mission, its vision is to be a strong and recognised agency which makes a crucial contribution to ensuring a better and more relevant higher education programmes for the students and the labour market. The vision is to continuously strive to develop the accreditation procedures by:

- bringing both new and existing knowledge of quality assurance and educational quality into play;
- developing the agency's expertise and knowledge, as well as uncovering new areas of importance to quality assurance and educational quality.

The agency's EQA activities are outlined in the IA and PA guidelines, respectively. These guidelines are published on the agency's website along with summary descriptions of each step in the process. To ensure consistency in the accreditation process, the Council published a memorandum directed to HEIs and accreditation panels. The memorandum complements the accreditation guide. According to the SAR, the memorandum has been updated (last update from 2022, on the website) in line with the decisions taken by the Council to ensure that it properly reflects the Council decisions and continues to serve as guidance to the accreditation panels and the HEIs.

The agency confirmed, during the meeting with the Chair of the Accreditation Council and the Head of Secretariat, that institutional accreditation remains the core and continuous activity, unchanged in

⁶ <https://akkrediteringsraadet.dk/database/>

substance despite organisational restructuring, ensuring continuity and regularity of external quality assurance (EQA) work. The planning of accreditation activities is conducted on a multi-year basis, with preparation of accreditation plans for the coming four years discussed with each newly appointed Council, indicating structured and forward-looking QA cycles. The extension of the accreditation cycle from six to eight years for mature institutions was discussed as a legally framed and deliberate adjustment, with follow-up procedures ensuring Council oversight and decision-making capacity.

The agency has clear goals and objectives outlined in their guidelines and procedure documents, guiding them through their daily work. They have an updated strategy plan, and the agency makes a yearly report of their results. They conduct internal evaluation reports and action plans are made as a result of the internal evaluation of their accreditation activities, see ESG 3.6 about the agency's IQA processes. It was further confirmed during the site visit of the agency's role as safeguarding the quality of higher education since 2013, ensuring that institutions have professional and reasonable internal QA procedures in place, reflecting clearly articulated objectives. The balance between control and development was explicitly discussed as a core objective of DAC's activities, with control seen as a prerequisite for enhancement-oriented dialogue with institutions. Staff and Council representatives confirmed that methodological development (e.g., moving towards more development-oriented approaches) is a deliberate operationalisation of strategic goals and responds to expressed institutional expectations.

Amendments to the Accreditation Act have altered the former organisation, which consisted of two independent bodies, namely the Accreditation Council (AC) and the Accreditation Institution (AI). The new agency DAC consists of the Council (the former AC) acting as the Board, and a Secretariat (former AI) of the Council/ Board. According to the agency, this change also addresses the concerns raised in the previous ENQA review regarding the dual accreditation system of AC and AI and of the involvement of stakeholders in the governing body.

The members of the Council include HEIs representatives and students, and the agency now has a board with stakeholder involvement in its governance. The Council discusses strategic issues and reflects on existing processes and procedures in dialogue with the Secretariat.

The site visit confirmed that stakeholder involvement in governance has been formalised through recent legal amendments, with the Council now explicitly responsible not only for decisions but also for methods applied (Act amending the Act on Accreditation of Higher Education Institutions, Chapter 2, The Accreditation Council and its Secretariat, Section 4, Subsection 3).

Council composition includes members from higher education institutions, the labour market, and students, with all members acting in their personal capacity (Act amending the Act on Accreditation of Higher Education Institutions Section 4, Subsection 3, and explanatory notes page 12); this was discussed as a key indicator of stakeholder inclusion in governance. The process for nominating and appointing Council members was described as transparent and regulated, with predefined stakeholder groups invited to nominate candidates and equality and conflict-of-interest requirements explicitly applied (Act amending the Act on Accreditation of Higher Education Institutions Section 4, Subsection 3, and explanatory note page 9, 11, 12, 16, and 17).

Students are permanently represented in the Council, with two student members who actively contribute to discussions and prepare questions for panel chairs ahead of assessments. The Students' Accreditation Council (STAR) was repeatedly referenced as an institutionalised forum for dialogue,

consultation, and feedback between students and the agency, including involvement in system development and SWOT discussions. Regular interaction with Council student members and participation in pre-meetings before approval of accreditation reports, reinforcing meaningful rather than symbolic involvement, was confirmed.

The SAR presents a list of activities involving stakeholders that the Council and the Secretariat will continue with:

- the recurring dialogue with HEIs and rectors' conferences;
- the recurring dialogue with different national student organisations, through the Students' Accreditation Council (STAR), which serves as a knowledge-sharing and discussion platform;
- the recurring dialogue with those interested in Learning Analytics at the HEIs, through the Learning Analytics Network.

It was confirmed in the interviews that there is interaction with higher education institutions. HEIs were described by multiple stakeholders as having a high degree of trust in DAC's role and processes, with accreditation perceived as a stable and necessary mechanism for safeguarding quality. Dialogue with HEIs is embedded throughout the accreditation process, including hearings, follow-up discussions, and consultation during methodological development. And the formalisation of hearings and reconsideration mechanisms was discussed as strengthening procedural transparency and legitimacy, thereby reinforcing trust among institutions.

Analysis

Based on the evidence presented in the ESG 3.1 section of the self-assessment report and corroborated during the site visit, the agency demonstrates substantive compliance with ESG 3.1 concerning activities, policies, and processes for quality assurance. External quality assurance is a stable, and continuous core activity of the agency, with institutional accreditation remaining the dominant review modality. Accreditation activities have been carried out regularly since their introduction, and this continuity has been maintained despite recent organisational restructuring. Between 2021 and 2025, the agency adopted a significant volume of institutional and programme accreditation decisions, evidencing both operational capacity and sustained engagement across the higher education sector. The legally enacted extension of the accreditation cycle from six to eight years for institutions with mature and repeatedly positively assessed quality assurance systems represents a proportionate, risk-based adjustment rather than a dilution of external quality assurance (see ESG 2.2 and the panel's recommendation). This modification is embedded in law, discussed strategically within the Council, and accompanied by structured multi-year planning, thereby preserving the regularity and predictability of external quality assurance activities.

The agency's goals and objectives are clearly articulated through its publicly available mission and vision, which emphasise safeguarding and enhancing the quality and relevance of higher education for students, society, and the labour market. These strategic aims are not merely declaratory but are operationalised through the design and conduct of institutional accreditation, which focuses on the effectiveness of internal quality assurance systems, the identification of concrete quality challenges, and the provision of incentives for continuous improvement. During the site visit, the agency's leadership explicitly framed the balance between control and development as a guiding operational principle, underscoring that compliance-oriented assessment is intentionally combined with enhancement-oriented dialogue. The ongoing methodological evolution of institutional accreditation, including the transition from earlier programme-focused approaches to system-level evaluation and the preparatory reflections for a future third cycle, further demonstrates that strategic objectives

are actively translated into daily practice and methodological refinement rather than remaining static policy statements.

Stakeholder involvement in governance, previously identified as a weakness in earlier external reviews, has been substantively strengthened through recent legislative amendments. The agency is now governed by a Council that formally functions as its board, with membership collectively encompassing experience from higher education institutions, students, and the labour market. Council members are appointed through regulated procedures and act in their personal capacity, supported by explicit conflict-of-interest safeguards, such as the rules on impartiality in the Public Administration Act and the hearing of the HEIs throughout the accreditation process. Even though the nominating and appointment of Council members is well regulated, it was found during the site visit that it was not clear to all stakeholders how this was processed. The agency could explore ways to make this more transparent.

Importantly, the Council's role extends beyond formal decision-making to include strategic deliberation on accreditation methodologies, cycles, and system development in structured dialogue with the Secretariat. This governance arrangement addresses earlier concerns regarding the absence of stakeholder participation at the strategic level and aligns the agency's organisational structure with ESG expectations.

Beyond governance, stakeholder involvement is deeply embedded in the agency's daily work. Regular and institutionalised dialogue with HEIs, rectors' conferences, student organisations, and thematic networks ensure continuous interaction throughout accreditation processes and methodological development. Student participation is particularly well-integrated, with students represented in the Council and actively engaged through dedicated forums (e.g., STAR) that facilitate consultation, feedback, and reflection on quality assurance practices. Evidence from the site visit indicates that HEIs perceive accreditation as a stable, transparent, and dialogue-based process, reinforced by formal hearings, reconsideration mechanisms, and opportunities for feedback. These interaction patterns contribute to public trust in the agency's work and enhance the legitimacy of its external quality assurance activities.

Taken together, the evidence demonstrates that the agency fulfils ESG 3.1 in substance and practice. External quality assurance activities are regular, strategically planned, and legally underpinned; goals and objectives are explicit, publicly articulated, and operationalised in daily work; and stakeholder involvement is both structurally embedded in governance and meaningfully integrated into operational processes. While the agency itself recognises ongoing challenges, such as maintaining a strong development focus across longer accreditation cycles, these are explicitly acknowledged and addressed within a reflective and forward-looking quality assurance framework.

Panel commendations

I. The review panel commends the agency for the stakeholders' confidence in its activities, as demonstrated by ongoing dialogue, active participation in various activities, and involvement in the development of accreditation processes.

Panel suggestions for further improvement

I. The agency is encouraged to further work together with the Ministry and explore ways to increase transparency among stakeholders regarding the appointment of Council members.

Panel conclusion: compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

2021 review recommendation

ENQA Agency Review Report (substantial compliance)

The agency should reflect about the understanding of independence between AI and the AC and how to balance between their statutory independence and the necessary coordination and congruence between these two bodies.

EQAR Register Committee decision (compliance)

No recommendations.

Terms of Reference - Focus areas C) Standards affected by substantive changes

Whether the recent changes have affected the agency's organisational and operational independence.

Evidence

Organisational independence

The SAR states that the Accreditation Council is established by law as a professionally independent body, explicitly not subject to ministerial instruction in professional matters, and that this safeguard is reaffirmed in the 2025 amendment to the Danish Accreditation Act.

There has been a structural consolidation without loss of autonomy. The dissolution of the former Danish Accreditation Institution (AI) and the creation of a unified Accreditation Council with an internal Secretariat is presented in the SAR as a structural simplification rather than a reduction of independence, with the law explicitly stating that the Secretariat acts with full professional independence despite being administratively located within the Danish Agency for Higher Education and Science.

There are formal safeguards against third-party influence. The SAR states that neither higher education institutions, labour market organisations, nor the Ministry can issue instructions on accreditation judgments or methodologies, ensuring arm's-length governance.

During the site visit and the interviews, both Council leadership and external stakeholders explicitly addressed the risk of perceived dependence following the reform and confirmed that legal wording, internal procedures, and communication strategies are actively used to mitigate this risk, indicating institutional awareness beyond formal compliance.

Operational independence

The agency has an autonomous definition of accreditation procedures and methods. The SAR states, and it was confirmed during the interviews, that the Council independently defines procedures and methods for accreditation autonomously within the legal framework of the Accreditation Act, which lays down the accreditation criteria. The criteria are operationalised by the Accreditation Council in

the accreditation guidelines, without requiring external approval from the Ministry or other stakeholders.

Furthermore, the agency ensures independent appointment of external experts. According to the SAR, the nomination, vetting, and appointment of accreditation panel members are conducted solely by the Secretariat, including systematic conflict-of-interest checks and declarations of personal capacity, in line with ESG expectations. While HEIs are consulted on panel composition for conflict-of-interest purposes, both the SAR and the interviews during the site visit clarified that such consultation does not extend to influencing expert selection or procedural design, reinforcing autonomy in practice.

Site visit discussions with the Chair and the Head of Secretariat confirmed that organisational restructuring did not alter day-to-day control over accreditation operations, panel composition, or report drafting, supporting the claim that operational independence is not merely formal but functional.

Following the organisational change in the agency and the reduction of staff, the Secretariat makes use of and is dependent on some resources from the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science). The agency's and the Secretariat's independence are clearly formulated and regulated in the Accreditation Act. However, during the interviews, some concerns about the safeguarding of the agency's independence in the new organisation were raised. The SAR openly acknowledges the reputational risk arising from closer administrative proximity to the Ministry and documents explicit legal and procedural countermeasures, a point constructively discussed and reflected upon during the site visit.

Independence of formal outcomes

The SAR clearly states that accreditation decisions are taken exclusively by the Accreditation Council and cannot be overturned by the Minister or other administrative bodies. Appeals are limited strictly to legal issues.

There is clear separation between expertise and representation. Council members, including those with backgrounds in HEIs, labour market organisations, or student bodies, are formally appointed in their personal capacity, a point repeatedly emphasised in the SAR, reinforced by conflict-of-interest rules and confirmed during interviews. This independence is stated on the explanatory note of the Accreditation Act, and was confirmed during the interviews on the site visit.

The SAR documents that while panels include experts from diverse stakeholder backgrounds, the final accreditation outcomes remain the sole responsibility of the Council, fully aligned with ESG guidance on outcome independence.

During the site visit, stakeholders, including student representatives, confirmed that deliberations and decisions are perceived as evidence-based and insulated from external pressure, thereby supporting not only formal independence but also credibility and trust.

Further review of the evidence led the panel to conclude that there was explicit communication of personal capacity. The SAR and interviews confirm that all experts and Council members are formally informed that they act in an individual, professional capacity rather than as representatives of nominating bodies, directly addressing the final paragraph of the ESG 3.3 guidelines.

Analysis

At the level of organisational independence, the Accreditation Council is established by law as a professionally independent body, explicitly not subject to ministerial instruction in professional

matters. This safeguard is reaffirmed and strengthened in the 2025 amendment to the Danish Accreditation Act, which explicitly states that both the Council and its Secretariat act with full professional independence. The dissolution of the former dual structure (Council and the separate Accreditation Institution) and the creation of a unified authority with an internal Secretariat are convincingly described as a structural simplification rather than a diminution of autonomy. Crucially, the legal framework clarifies that the administrative placement of the Secretariat within the Danish Agency for Higher Education and Science does not entail hierarchical or instructional dependence. This distinction is not only codified in law but also explicitly acknowledged and addressed in the agency's own reflections, indicating institutional awareness of the difference between formal independence and perceived independence.

Operational independence is robustly evidenced. The Council retains exclusive authority to define accreditation procedures and methods, while the Ministry lays down the accreditation criteria, which are then subsequently operationalised into the accreditation guidelines by the Accreditation Council, without external approval or validation from the Ministry or other stakeholders. The Secretariat independently plans and executes accreditation processes, including the nomination, vetting, and appointment of external experts. Conflict-of-interest procedures are systematic and multi-layered: experts act in a personal capacity, formally declare potential conflicts, and are subject to independent checks by the Secretariat. Consultation with higher education institutions on panel composition is explicitly limited to identifying conflicts of interest and does not constitute influence over expert selection or procedural design. Site-visit discussions confirmed that the organisational reform did not alter day-to-day operational control, panel appointment practices, or report drafting responsibilities, thereby substantiating that operational autonomy is exercised in practice rather than merely asserted in policy.

Even though the agency's independence in its activities under the scope of the ESG (including the Secretariat's use of resources from the Danish Agency for Higher Education and Science) are regulated in the Accreditation Act, there are concerns about the independence due to synergic use of resources of the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science). The panel's concerns about independence were addressed in the interviews. It is important to note that the main concern raised in the interviews was scepticism about the impact, the overall staff capacity, and the speed of support for the Secretariat, and these concerns were not related to independence. The panel noted that concerns and scepticism from the discussions stemmed from varying levels of information among those participating in the interviews. This highlights the importance of effective communication regarding the setup and its impact, as it will be essential for maintaining trust.

Regarding the independence of formal outcomes, the evidence is unequivocal. Accreditation decisions are made solely by the Accreditation Council and cannot be overturned by the Minister or other administrative bodies; appeals are limited strictly to legal, not professional, grounds. Council members, including those nominated through stakeholder channels such as higher education institutions, labour market organisations, or student bodies, are appointed in their personal capacity and are bound by explicit conflict-of-interest rules. This separation between background expertise and representational mandate is consistently emphasised in both documentation and interviews during the site visit. While expert panels incorporate diverse stakeholder perspectives, responsibility for final accreditation outcomes rests exclusively with the Council, in full alignment with ESG expectations. Site-visit testimonies from multiple stakeholder groups confirmed that decisions are perceived as evidence-based, consistent, and insulated from external pressure, reinforcing both legitimacy and trust.

The stakeholders raised their concerns during the interviews that the independence is safeguarded in the new organisational structure. They were clear that this is not a problem in the present situation, but that they will follow up on how this is managed and how this will develop in future accreditation processes.

The evidence demonstrates that the agency meets the ESG 3.3 standard in a comprehensive and substantiated manner, with recent structural reforms accompanied by explicit legal, procedural, and communicative safeguards that preserve and clarify independence. The analysis confirms not only formal compliance but also a high degree of functional and perceived independence, which is critical given the organisational changes introduced in 2025.

Panel suggestions for further improvement

2. The review panel suggests that the agency communicate to stakeholders that independence is safeguarded in the new organisational setup and how this is achieved.

Panel conclusion: compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2021 review recommendation

Terms of Reference - Focus areas C) Standards affected by substantive changes

Whether the agency still has adequate and appropriate resources, both human and financial, to carry out its work.

Evidence

Financial resources

The DAC's finances are secured through a sub-budget line in the Finance Act. Based on the information in the SAR, the sub-budget line covers fees for the chairperson and members of the Council, fees for members of accreditation panels, and salaries for the Secretariat's staff regarding accreditations of educational institutions and programmes under the Ministry of Higher Education and Science. Accreditations of educational institutions and programmes under other ministries are financed separately via the respective ministry. During the site visit, it was confirmed that the resources dedicated to the sub-budget line cannot be used for any purpose other than for the activities of DAC. According to the proposed finance bill for a four-year period, further restrictions of resources are expected, from 13,5 million Danish Kroner (for 2026) to 12,7 million Danish Kroner (for 2029). Other tasks which are outside the scope of the ESG are financed by those who request these assessments and pay for the expenses themselves.

According to the SAR, the amount of funding and the reduction shown in Table 2 for 2026-2029 are not specific to the accreditation operation of DAC but show the reductions to the funding for 2026-2029 resulting from general budget reductions across the entire Danish central government administration.

Table 2. Funding of DAC

YEAR	2025*	2026	2027	2028	2029
Funding, DKK (millions)	23,8 (approx. 3,2€)	13,5 (approx. 1,8€)	13,2 (approx. 1,77€)	13 (approx. 1,74€)	12,7 (approx. 1,7€)

* Supplementary information from the agency

HEIs under the Ministry of Higher Education and Science do not pay accreditation fees. The Secretariat's staff also carries out certain assessment tasks outside the scope of the ESG. From the ToR, these are *SU vurderinger*, *Niveau vurderinger*, and *Assessment of providers of mandatory working environment courses*. Those requesting these assessments pay the expenses for these activities.

Human resources

The panel learned from the site visit that the agency's human resources have been stable for many years. Following the reorganisation of the agency, it now consists of the Council and the Secretariat. According to the SAR, there was a significant reduction in employees along with the change of the agency's structure, from 33 FTEs to 15 FTEs. The positions as directors of operations were abolished, and the only manager position among staff is currently the Head of Secretariat, formerly the director of AI. DAC currently has 16 employees (15 FTEs), and is composed of one Head of Secretariat, eight senior advisors, one special advisor, five heads of sections and one part-time student assistant. The extended length of the accreditation cycle to eight years may also reduce the burden of work of the staff in the new Secretariat.

The retained staff of the agency is involved in the core accreditation activities. The SAR and findings from the site visit expressed that the key change is that the agency will be provided with administrative and technical support staff, including IT, financial, and legal services, employed in the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science). At the beginning of the site visit, it was not fully clear exactly which services would be provided by the Ministry and how they would be secured. The DAC's staff admitted that having some services by the Ministry would likely result in longer process time when solving some tasks than before. It was explained that there is a will to have a formal agreement on this matter between DAC and the Ministry. The panel notes that, by the end of the site visit, a framework agreement between the Ministry and DAC on the usage of these services had been signed. This document was shared with the panel. The agreement states the Secretariat's tasks to serve the Council, and that it is responsible for the operational implementation of accreditation tasks and other tasks related to the ESG, such as preparing draft guidelines, setting up accreditation panels, preparing accreditation reports, and maintaining dialogue with the HEIs. Furthermore, it also states that the Ministry will provide legal advice and assistance, administrative (e.g., travel bookings and payments), IT support, and communications tasks (e.g., the agency's website). It is clearly stated in the agreement that the accreditation task is linked to the requirement for independence set out in the ESG 3.3, and that the services that the Secretariat render to the Council are provided without the involvement of any authorities (management or employees) who are not part of the DAC.

The DAC appropriately responded to the staff reduction, and it is planned that the agency will reduce the creation of new thematic analyses (TAs) from the previous two to three per year to one

every 18 months. TAs will be created jointly in cooperation with several employees as a project, but there will be no specially dedicated employees for this job anymore. Additional workload reduction will be due to the shift to an 8-year accreditation cycle (from the previous 6-year accreditation cycle) for the institutions that have received positive accreditation in the first and second cycles. This will not only reduce the workload for DAC employees but also reduce costs for accreditation panels.

The DAC ensures professional development and training for its employees and offers flexible working conditions. The annual employee development interviews ensure a systematic review of each employee's need for competence development. The site visit provided the panel with additional evidence of the agency's staff who are professional in how they organise and run the EQA activities, and their communication with the HEIs, reviewers, and other stakeholders.

Analysis

The DAC is aware of its financial and human capacities. The panel found that the funding and human resources should be sustainable for the foreseeable future, especially given the reduction in the number of reviews per year and the extension of the accreditation period. With the changed plans and ambitions for the TA, the DAC will manage with the current human resource capacity. However, the agency should evaluate the results of the changes. The reduction of financial resources from the budget by 5%, in the next four-year period, should not pose a danger to the agency's ability to perform its duties. From the site visit, there was agreement that the current financial and human resources are regarded as sufficient for the agency to fulfil its mission, but that this should be monitored by the agency. Based on the evidence, the panel found that resources have enabled the agency to improve practices, including sharing information and organising and running IQA activities in a professional way. The site visit supported the evidence, especially of the professionalism of the DAC staff in the meetings with the HEIs, the reviewers, and other stakeholders.

There is a concern about DAC's need for services and support, which depends on the Danish Agency for Higher Education and Science (Ministry of Higher Education and Science). However, the willingness to understand the agency's needs and the signed formal agreement, *Framework for secretarial services*, between the agency and the Ministry, is expected to ensure that necessary support and services are provided. However, since this agreement hasn't been implemented yet, the panel considers it essential to closely monitor this matter and ensure it undergoes a thorough evaluation, thereby enabling the initiation of any necessary amendments.

Panel commendations

2. The review panel commends the agency for its commitment to staff professionalism and for maintaining high standards for external quality assurance activities during the transition period.

Panel recommendations

1. The review panel recommends that the agency closely monitor the implementation of the *Framework Agreement for secretarial services* and ensure it undergoes a thorough evaluation, thereby enabling the initiation of any necessary amendments.

Panel conclusion: compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

2021 review recommendation

ENQA Agency Review Report (substantial compliance)

The agency should consolidate its processes of internal reflection and devote more attention to self-reflection, namely by using in a more systematic way the contributions of internal and external stakeholders.

EQAR Register Committee decision (partial compliance)

Taking in consideration the need for more systemic and better structured management of the internal feedback and the lack of response to the issues raised in the previous external review, the Register Committee was unable to concur with the panel's conclusion and found the agency to be partially compliant with the standard.

Terms of Reference - Focus areas A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision

Whether the agency had developed more systemic and better structured management of its internal QA processes.

Evidence

In response to the need for a more systematic and well-structured management of internal processes, the agency has implemented an internal quality policy, establishing a comprehensive framework for its internal quality assurance processes. The DAC's Secretariat works according to internal quality assurance procedures, which are outlined in the Procedure Handbook.

The agency's quality policy is available on the DAC's website. The panel was provided with a translation of the *Quality Policy for the Secretariat of the Accreditation Council*, which was revised in June 2025. The quality policy covers the following areas: professional staff, equal treatment of HEIs, internal and external feedback mechanisms, competent experts, dialogue with relevant stakeholders, and efficient administration. The quality assurance policy is supported by several procedure descriptions, guidelines, and templates.

The agency has a Procedure Handbook, supported by guidelines, writing guides, and templates to ensure consistent and systematic accreditation processes. As stated in the SAR, the Procedure Handbook is a dynamic tool for quality assurance, and a team at the agency is responsible for continuous updates based on input from feedback processes, internal Secretariat meetings, and internal and external evaluations. With the evidence from the SAR, supported by additional evidence that the panel has received, it is evident that the agency has internal and external feedback processes to enhance the quality and consistency of the work of the DAC's accreditation consultants and the reviewers.

DAC collects feedback from HEIs and accreditation panels. The agency has a dedicated evaluation group responsible for collecting and analysing the results. The evaluation group writes an external report, which is presented to the Council and is published on the agency website. Annex 6 of the

SAR is the latest published report, *Evaluation of the institutions' resource utilization and development orientation in the second cycle of institutional accreditation (2024)*, based on an evaluation involving 16 HEIs. In the report, it was stated that the agency had an ambition to simplify and streamline the accreditation process in order to make it less time-consuming and documentation-heavy. In the summary of the report, among other points, it is noted that the time and amount of documentation have been significantly reduced. However, from what the panel can read from the report, the HEIs have different experiences of what the reduced amount of documentation has meant for them. Several HEIs state that it has been challenging to reduce documentation, while a few take a more positive view. This concern was also raised during the site visit.

The panel was provided with the *Secretariat's internal development report*, finalised in May 2025. The evaluation group also writes this internal development report in addition to the external report. It was explained in the SAR that the internal report covers more topics than the external report, such as the contact between the HEIs and the secretariat and the training of accreditation panels. The internal report is used as an input to enhance and improve the secretariat's methods and processes by identifying and discussing areas that should be maintained and areas that could be developed. Based on the Secretariat's internal development report, areas for improvement were outlined in an action plan. The panel was provided with the agency's action plan for 2025-2026, showing priorities for areas for improvement, indicated with a timeline and the person(s) in charge.

In order to enhance the quality and consistency of their work, the agency has set up internal feedback processes with knowledge sharing and feedback meetings. For each IA process, a team of accreditation consultants is formed and led by a nominated project leader. Although the management layer of directors of operations has been removed, it is explained in the SAR that the two former directors of operations responsible for the internal feedback process of the IA will continue to fulfil the role as project owners during a transition phase until spring 2026. It is stated in the SAR that the agency will, at the same time, examine the internal feedback process within the new organisational structure of the Secretariat. This will be piloted in connection with the recently initiated IA process, where a formal decision is expected to be taken in winter 2026.

The SAR states that there is in place continuous feedback with meetings and knowledge sharing among and between the teams of accreditation consultants, where they can discuss specific issues and issues of common interest, such as ensuring consistency in the reports. Teams often assess their collaboration and communication to learn from experience and improve processes. The project leader meets with the former director of operations to address process-related issues during the accreditation process. For major topics, all team members join the meeting. The general meetings held every two weeks provide a formal platform for knowledge sharing, particularly regarding ongoing IA processes. At these meetings, accreditation teams present challenges, methodologies, and results, prompting questions and feedback. These sessions also facilitate broader discussions about methods, practical experiences, and new ideas related to the IA process. In the follow-up report from 2023, the Secretariat has refined its internal feedback model to further strengthen consistency. As explained in the SAR, the agency has an internal feedback process that includes six feedback meetings throughout the accreditation process. The feedback group involved in these meetings consists of the team (including the project leader) and the former director of operations. A colleague (an accreditation consultant from a different team) and the Head of the Secretariat join the feedback group in some feedback meetings.

The first feedback meeting occurs when the HEI submits its institutional report (system description and SAR) at the initial phase of the accreditation process. The team reviews the HEIs' quality assurance examples, key figures, and the institutional report, then discusses their initial analysis in the first meeting of the feedback group (two former directors of operations and a colleague). This process aims to gain a thorough understanding of the HEI's quality assurance system, identify

strengths and weaknesses early in the process, and help the panel focus on key issues for the first site visit.

Between the two site visits, the accreditation team revises the initial analysis to qualify and sharpen it. This revision is based on insights from the first site visit, the accreditation panel's discussions, and, depending on the timing, the audit trail documentation. The accreditation team receives feedback on the revised analysis from the feedback group at a feedback meeting.

After the second site visit, the accreditation team prepares the draft accreditation report based on the accreditation panel's assessments and recommendations, and several internal feedback meetings are held with the feedback group.

One of the former directors of operations typically observes accreditation panels' preparatory meetings and site visits, providing detailed feedback to the team and ensuring consistency across cases. An accreditation consultant from a different team also participates in most of the feedback meetings. This ensures that the presentation of the case and the argumentation are also comprehensible to an "outsider". The Head of Secretariat engages in the third and fourth feedback sessions of the drafting of the reports, and can be involved at an earlier stage should indications arise that the accreditation process may be unusually complex.

Analysis

The evidence demonstrates that the agency has in place processes for IQA, and the published policy clearly states the importance of a competent and professional agency staff that acts ethically. Internal and external feedback mechanisms are further developed and in place. IQA processes, including the publication of the yearly evaluation and processes for improvement as described in the action plan, are implemented. The agency continuously updates important documents, such as the Procedure Handbook, guidelines, and various templates, to further ensure that the QA processes are carried out accordingly and in a systematic way. The agency involves stakeholders in relevant IQA processes, and this involvement was further confirmed by stakeholders and reviewers during the site visit.

The panel found that the agency has a thorough process for assuring the quality of procedures and reports. This is evident from the documentation. From the site visit, the panel found agreement and a common understanding of ensuring the quality of the agency's processes, which supports confidence in their work.

Regarding the IA's internal feedback processes, the SAR and the description of these processes, together with the published internal development report and action plan, make it evident that a more systematic and better-structured management of internal QA processes is in place. The panel's view is that the agency has successfully addressed previous recommendations. Additionally, the internal feedback meetings with the feedback group, following the steps in the accreditation process, including the team assessment of their collaboration and communication to learn from experience and improve processes, provide room for self-reflection and deeper analysis of the agency's internal needs.

The panel agrees that it is a practical solution to keep the two persons (the former director of operations) to continue fulfilling the role as project owners during a transition phase. This ensures continuity while piloting the internal feedback process in the agency's new organisational structure.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

2021 review recommendation

ENQA Agency Review Report (substantial compliance)

The agency should reconsider its approach condensing to 3 standards and to evaluate on whether these 3 standards are effective and comprehensive in addressing the whole of Part I of ESG.

EQAR Register Committee decision (compliance)

No recommendations.

Evidence

The agency evaluates the effectiveness of the IQA processes outlined in Part I of the ESG using clearly defined criteria and is tasked with ensuring their proper implementation. It does so in three main ways: through the publication of Accreditation Guidelines, a continuous dialogue with stakeholders about the criteria, and through reviews in which the criteria serve as the primary interpretive framework.

During the site visit, the panel focused on Programme Accreditation (PA) and the current Institutional Accreditation (IA) 2.0.

Institutional Accreditation 2.0 has the following three criteria:

1. Systematic and inclusive quality assurance - The institution has quality assurance that continuously supports the development of the quality and relevance of the provision of programmes, including adaptation to societal developments and labour market needs.
2. Knowledge base - The institution has a practice that ensures that education programmes and teaching are always based on a knowledge base corresponding to the programmes of the given type and at the given academic level and that provides a solid foundation for achieving the programmes' goals.
3. Level, content and organisation - The institution has a practice that ensures that programmes have the correct level, including academic content, teaching quality, organisation and tests, to support student learning and the achievement of the overall intended learning outcomes.

Programme Accreditation has the following five criteria:

1. Demand and relevance - The programme is relevant in relation to the demand in the labour market.
2. Knowledge base - The programme builds on the type of knowledge base required by the ministerial rules for the specific type of programme.
3. Goals for learning outcomes - There is a connection between programme content and goals for learning outcomes.
4. Organisation and completion - The organisation and practical completion of the programme support the achievement of the goals for learning outcomes.

5. Internal quality assurance and development - The quality assurance of the programme complies with the European standards and guidelines for internal quality assurance at higher education institutions and functions well in practice.

The IA 2.0 has three main criteria, while PA has five. These criteria also include several sub-criteria, as indicated in the guidelines and the reports. In the SAR, the correspondence between Part I of the ESG and the criteria used in the different types of reviews is outlined in a table listing the EQA activities first-cycle IA (1.0), second-cycle IA (2.0), and PA. The agency's follow-up report stated that it was working within the framework for the third-cycle IA and would initiate a dialogue with the stakeholders to discuss further development of the IA and assess the current framework. The yearly report, *Evaluation of the institutions' resource utilization and development orientation in the second cycle of institutional accreditation (2024)*, which was annexed to the SAR, shows that the opinion varied. While some HEIs are concerned that too many changes should not be made, several others see a need for adjustment. These institutions are also concerned that the third cycle does not simply repeat the second cycle or lower the bar.

During the site visit, the panel became aware that new guidelines had been published for arts and culture institutions. These are institutions that fall under the Ministry of Culture. An executive order was published on 19 August 2025, *Executive Order on the Accreditation of Higher Education Institutions and Approval of New Higher Education Programmes under the Ministry of Culture*, which replaces the former *Executive Order No. 339 of 6 April 2016 on the accreditation of higher education institutions and the approval of new higher education programmes under the Ministry of Culture*. The development of a new guideline and the change in the new executive order are a result of the evaluation and the feedback from arts and culture institutions and relevant stakeholders. The existing criteria for IA 2.0 and guidelines were made to be more tailored and appropriate to ensure education in the arts and culture. In this respect, the second-cycle IA 2.0 for arts and culture institutions will follow the new adapted guidelines. The IA 2.0 reviews for these institutions are planned to start in 2026. The IA 2.0 for arts and culture institutions is therefore included in the table below to explore its alignment with ESG Part I.

Table 5 The Agency's EQA activities and their correspondence to ESG Part I

ESG Part I	Accreditation Criteria			
	IA 1.0	IA 2.0	PA	IA (2.0) KUM ⁷
I.1 Policy for quality assurance	1	1	1, 2, 3, 4, 5	1.1
I.2 Design and approval of programmes	5	1	5	2.3
I.3 Student-centred learning, teaching and assessment	4	3	4	2.4, 2.5
I.4 Student admission, progression, recognition, and certification	4	3	3,4	2.1
I.5 Teaching staff	3	2	2	2.2
I.6 Learning resources and student support	4	3	5	*
I.7 Information management	2,3,4,5	1	5	1.2

⁷ Kunstneriske uddannelsesinstitutioner under Kulturministeriet (KUM)/Institutions in the arts under the Ministry of Culture. The criteria indicated in the document *KUM-koncept_kriterier+ESG* does not correspond with the criteria in the Danish and English version of *Vejledning om institutionsakkreditering Videregående kunstneriske uddannelsesinstitutioner under Kulturministeriet* and is therefore adjusted in this table.

1.8 Public information	1	1	1,2,3,4,5	**
1.9 On-going monitoring and periodic review of programmes	2,3,4,5	1	5	1.3
1.10 Cyclical external quality assurance	1,2,3,4,5	1,2,3	1,2,3,4,5	***

*ESG 1.6 Learning resources and student support are covered by the Teaching Environment Act, which requires that a teaching environment assessment be carried out at least every three years.

**ESG 1.8 Public information is covered by arts education institutions publishing their admission procedures, study programmes and other relevant information about their programmes on their websites.

***ESG 1.10 The cyclical nature of DAC's review ensures that every HEI is subject to an external review process at least every 8 years (Section 5 of the Executive Order on the accreditation of HEIs and approval of new Higher education programmes under the Ministry of Culture).

According to the SAR, the agency addresses the various items of ESG Part I in the following way:

1.1 Policy for quality assurance: The agency's reviews examine how the public policies for quality assurance are integrated into the strategic management of the HEI and how the institutions involve internal and external stakeholders in implementing the policy. How the policy is implemented, monitored, and revised is decided by each HEI, as long as it fulfils the accreditation criteria. The guidelines for arts and culture institutions, KUM, have similar criteria and correspond with ESG 1.1.

1.2 Design and approval of programmes: The agency ensures that HEIs have established processes for the design and approval of their programmes and that these processes ensure that the programmes meet their intended learning outcomes, align with the appropriate level of the Qualifications Framework, and are relevant to the labour market, among other things. The guidelines for arts and culture institutions, KUM, have similar criteria and correspond with ESG 1.2.

For new programme proposals from HEIs that have not yet received Institutional Accreditation, programmes must first obtain a prequalification from the Advisory Committee to Assess the Range of Higher Education Study Programmes Offered (RUVU) before they can apply for a Programme Accreditation. Based on RUVU's recommendation, the Minister for Higher Education and Science decides whether the programme should be prequalified and thereby permitted to proceed with an accreditation application. At this stage, the agency becomes involved through the PA review to assess the quality of the proposed programme.

1.3 Student-centred learning, teaching and assessment: The agency reviews assess whether HEIs ensure that students take an active role in the learning process and whether assessments reflect this approach. In IA 2.0 it is explicitly required that teaching and assessment support student-centred learning, that students are able to achieve the intended learning outcomes within the designated study period, and that HEIs use external examiners' reports as a quality assurance tool. The guidelines for arts and culture institutions, KUM, correspond with criteria 2.4 and 2.5.

Regarding student assessment, the law mandates that at least one-third of all exams in each programme must involve external examiners. These examiners are appointed by and organised in one of the national and sector-specific Censor Corps under the ambit of the Ministry of Higher Education and Science. Furthermore, students have the right to file a complaint with their HEI if they believe an examination does not comply with official standards, rules, or procedures. If the HEI does not uphold the complaint, the student may appeal the decision to a national appeals board.

1.4 Student admission, progression, recognition, and certification: The agency considers the full student life cycle across all review types, ensuring that HEIs operate with fit-for-purpose admission, induction, recognition, and completion procedures in a consistent and transparent

manner. Any of these activities may be the subject to an audit trail during the IA review, to confirm that HEIs effectively collect, monitor, and act on data related to student progression.

Moreover, a number of bylaws set the requirements for student admission. Complaints regarding admission are handled by the Danish Agency for Science and Higher Education under the MHES. Diploma supplements are issued by HEIs to ensure national and international recognition of higher education qualifications.

External quality assurance is one mechanism that supports consistency, transparency, and fairness in admission, recognition, and certification. Several ministerial orders regulate admission, including those for arts and culture institutions. The Coordinated Admission (KOT) manages national admissions through two quotas: Quota 1 (based on upper secondary grades) and Quota 2 (based on broader, transparent criteria). KOT ensures that applicants receive only one admission offer.

Graduate programme admissions are handled by individual universities, while complaints about admission are managed by the Danish Agency for Higher Education and Science under the Ministry of Higher Education and Science. HEIs issue diploma supplements to support both national and international recognition of qualifications.

A coherent framework is in place to support fair and transparent student admission, progression, recognition, and certification.

1.5 Teaching staff: All review types conducted by the agency assess whether HEIs ensure the competence of their teaching staff and how an institution demonstrates that its programmes are anchored in relevant academic environments based on updated knowledge that aligns with the type and academic level of the programme. The agency's reviews ensure that HEIs have systematic practices in place to support teaching staff in staying up to date with developments in their fields and in linking education to research or R&D effectively. Furthermore, HEIs must demonstrate that relevant management levels address challenges and follow up on initiatives to enable teachers to foster the acquisition of knowledge, competencies, and skills among students. Recruitment procedures for teaching staff are regulated by collective bargaining agreements. These agreements also determine the official job structure and remuneration for teaching staff.

1.6 Learning resources and student support: The agency assesses whether all HEIs offer adequate and easily accessible learning resources and student support, including IT, libraries, classrooms, and administrative services. This assessment is conducted across all review types through student surveys and interviews with students, staff, and management during site visits.

While the agency assesses whether HEIs meet the requirements for learning and teaching environments, it does not evaluate funding levels, as this falls under the authority of the Ministry of Higher Education and Science. All Danish HEIs receive public funding, primarily based on the number of students passing exams. This is supplemented by a basic grant (25%) and a smaller performance-based grant (7.5%), both aimed at ensuring sufficient resources for teaching and learning.

For arts and culture institutions, the panel was informed that learning resources and student support are covered by the Teaching Environment Act, which requires a teaching environment assessment at least every three years. In the guidelines, this is specifically included under the guiding remarks that the collection, analysis, and use of relevant information include teaching evaluations and evaluations of the teaching environment.

1.7 Information management: HEIs must demonstrate that they systematically collect relevant information and use it effectively for quality assurance and management of their programmes. The information should cover aspects such as knowledge base, study environment, study activity, student evaluations, exam results, dropout rates, graduation times, internationalisation, and employment

outcomes. To ensure effective quality assurance at both institutional and programme levels, the agency requires HEIs to establish clear standards for satisfactory and unsatisfactory quality and relevance, regularly collect the necessary information, regularly report on these standards, and implement appropriate measures in a timely manner.

1.8 Public information: the agency checks whether HEIs publish information about their programmes and other activities, and that this information is accurate, up-to date, and readily accessible. In line with the Act of Transparency and Openness in Education, HEIs are required to disclose details such as programme offerings and admission criteria, intended learning outcomes, qualifications awarded, teaching and assessment methods, graduation and dropout rates, available learning opportunities, and graduate employment outcomes. Responsibility for monitoring transparency lies with the authority overseeing the respective HEIs. For arts and culture institutions, the panel was informed that this is covered by the institutions publishing their admission procedures, study programmes, and other relevant information about their programmes on their websites. It is the panel's understanding that the Act of Transparency and Openness in Education and the requirements in relation to the provisions of HEIs are shared, accessible to the public, and are applicable for arts and culture institutions as well.

1.9 On-going monitoring and periodic review of programmes: Every review type conducted by the agency requires HEIs to periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. The agency ensures that the institutions use these reviews to enhance the quality and relevance of their programmes.

1.10 Cyclical external quality assurance: The cyclical nature of the agency's reviews ensures that every HEI is subject to an external review process at least every six years, and following the recent amendment to the Accreditation Act, at least every eight years for HEIs that have completed the first and second cycles of institutional accreditation.

Analysis

Taking into account the evidence presented above, the panel considers that neither the IA (1.0 and 2.0) or the PA has undergone any substantial changes in relation to ESG part I as addressed in the former review in 2021. As described in the SAR and outlined in the evidence above, the agency's criteria of IA and PA aim to cover Part I of the ESG. Addressing the recommendation from the previous ENQA review report that the agency should reconsider its approach condensing to three standards and to evaluate on whether these three standards are effective and comprehensive in addressing the whole of Part I of ESG, the agency addressed this through dialogue with HEIs and other stakeholders, through evaluation of accreditation processes, and engaging the staff members in an internal reflection. It was noted that the three standards appear to be broad and overarching, and consist of many sub-criteria, ensuring that all aspects of Part I are covered. Based on the evidence from the guidelines, the reports, and information presented in Table 5, the panel confirms that the ESG Part I is fully addressed. The agency is still preparing for the third cycle, but the evaluation report of the HEIs showed no strong consensus on changing the criteria.

The panel found, after being provided with documentation and dialogue during the site visit, that the process, guideline, and executive order in relation to the institutions of arts and culture is not a new activity for the agency. The institutions of arts and culture have completed the first cycle IA, and are now preparing for the second cycle. The panel found that the agency has made changes, such as creating separate guidelines for these institutions to better communicate and to adapt the EQA to the special characteristics of these institutions. It was also clear from interviews during the site visit that changes were introduced as a result of the feedback and evaluation after IA 1.0 of these institutions. It is also evident that the criteria from the IA 2.0 are recognisable in the guidelines for institutions of art and culture, though the specifications and interpretations are customised for the

field of arts and culture. As shown in Table 5, the EQA criteria for the institutions of arts and culture cover ESG Part I.

The KUM criteria do not directly cover ESG 1.6, 1.8, and 1.10, but it is evident that processes are to address these areas, and they are also included in the guiding remarks. It is noted in the KUM document that ESG 1.8 Public information is covered by arts and culture institutions, which publish their admission procedures, study programmes, and other relevant information about their programmes on their websites. It is also the case for the other institutions as described in the evidence in 1.8 above. It is evident that the Act of Transparency and Openness in Education requires that information about HEIs's provisions and activities is made public. It is, however, not clear if and how this will be addressed in the next cycle of the evaluation of arts and culture institutions.

Panel recommendations

2. The review panel recommends that the agency ensure that ESG 1.8 is addressed in the next cycle of institutional accreditation of the institutions of arts and culture.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2021 review recommendation

ENQA Agency Review Report: substantially compliant

The panel recommends that the agency should develop a continuous monitoring of its comprehensive approach, especially regarding the idea of differentiation and fitness for purpose. In particular, the agency should reflect on how to make the current system of IA effective for large and comprehensive institutions.

Evidence

The panel became aware of the new guidelines and the executive order for the institutions of the arts and culture and decided to include ESG 2.2. in the scope of this targeted review to address the development of new guidelines for Institutional Accreditation for Institutions of Arts and Culture (IA 2.0) by the agency.

The agency's current accreditation system comprises IA and PA. PA is not subject for assessment under this standard, as the panel focused on IA 2.0 for institutions of arts and culture under the Ministry of Culture. The 2021 ENQA review report notes that the transition from IA 1.0 to 2.0 has led to a stronger emphasis on the institutions' strategic QA capacity and the need for HEIs to demonstrate their ability to ensure the quality of their programmes. Stakeholder involvement was particularly relevant in developing IA 2.0, as reflected in several meetings and discussions about differentiating and simplifying procedures. The Accreditation Guide for the new cycle 2.0 of IA was developed in dialogue with key stakeholders, including HEIs, Rectors' Conferences from the different sectors in Danish higher education, national students' associations and representatives from the

Danish labour market. The development of IA 2.0 has provided an opportunity for further institutional differentiation, benefiting from greater involvement of external stakeholders, and particularly HEIs' contributions. Since the higher education sector consists of institutions with different profiles, sizes and institutional frameworks, an important aim of the new cycle of IA is to allow for greater differentiation on QA approaches, provided the system is solid and fulfils the criteria for quality and relevance laid down by ministerial regulations. As stated in the 2021 review report, the emphasis on differentiation aligns with a developmental approach, as it focuses on the specificities of each institution and its potential. This same approach has been followed in developing the new guidelines for the institutions of arts and culture, which are based on the seven HEIs under the Ministry of Culture.

Experience and feedback from the first cycle have been taken into account, which has resulted in a document specifically designed for the institutions of arts and culture. It was confirmed on the site visit that the institutions of the arts and culture have been actively involved in the development of the new framework and its guidelines, through dialogue, and from the evaluation of the first cycle. It was important that the new framework was tailored for this specific sector, so that it stays relevant and fulfils its purpose. The guide consists of two chapters: the first one includes the legislative framework, explanatory notes, examples, and inspiration on how to organise QA work. The second chapter describes the accreditation process, elaborates on its steps, and includes an appendix with helpful questions for self-evaluation.

The substantive change report stated that there are no new activities, that the current methodology and criteria will remain unchanged, and that the current cycle IA 2.0 will continue until 2027/ 2028. However, the cycle period will be changed from six to eight years, applicable to institutions that have received a positive result in their IA. It is assumed that this will reduce the staff's workload in the new Secretariat. Most HEIs were positive about the expansion of the cycle period because this will relieve the burden on institutions, allowing them to concentrate over a longer period on the implementation and development of their internal systems. However, some stakeholders were concerned that eight years is too long, especially if there is poor quality that goes on undetected. There have been discussions about introducing a mid-term process, but this has not been decided at the time of the site visit.

Analysis

The EQA of institutions for arts and culture under the Ministry of Culture has been developed through a comprehensive approach involving relevant stakeholders and based on experience, knowledge, and feedback from the first cycle. The panel found the approach and the new guidelines specifically defined for the institutions of arts and culture, ensuring their fitness for purpose, while also serving as a good example of development work and preparation for the second cycle. The second cycle of the IA review of the institutions of arts and culture under the Ministry of Culture will start in 2026.

Extending the accreditation period to eight years may raise some concerns. Although this will apply only to institutions that have received a positive decision from IA and have a robust IQA system, the panel believes it would be in the agency's best interest to monitor the impact of this change on the IA methodology's fitness-for-purpose. In doing so, it might consider whether there could be a good reason for a midterm process, as mentioned during the site visit.

Panel commendations

3. The review panel commends the agency's approach and process with the methodology development of IA 2.0 for the arts and culture institutions under the Ministry of Culture.

Panel suggestions for further improvement

3. The review panel suggests that the agency monitor the impact of the extended period and consider creating a midterm process.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2021 review recommendation

ENQA Agency Review Report (substantial compliance)

The agency should consider the establishment of a separate body that could analyse the institutions' complaints within the remit of the agency.

EQAR Register Committee decision (partial compliance)

The Register Committee concluded that the status quo in regards to the standard remains unchanged since the last renewal of registration in 2016. The Committee was therefore unable to concur with the panel, but found the agency only partially compliant with the standard.

Terms of Reference - Focus area A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision

Whether the agency has formal internal mechanisms for handling complaints and appeals.

Evidence

Following the 2021 EQAR decision that the accreditation system should handle appeals itself, the agency formalised a new mechanism. The formalisation of the process occurred through amendments to the Council's rules of procedure, which took effect in January 2025. It is outlined in the guidelines on appeals and complaints, made transparent, and published on the agency's website. The new appeal mechanism is described in the SAR, which states that HEIs may file an appeal regarding legal issues (to the Ministry of Education and Science) or appeal to the Reconsideration Committee.

The guidelines on appeals and complaints provide HEIs with a comprehensive overview of how and when to lodge a complaint or appeal in connection with institutional or programme accreditation. The guidelines distinguish between complaints and appeals. Complaints address issues raised during the accreditation process, up to the Accreditation Council's decision. Appeals concern the Accreditation Council's decision itself. In such cases, HEIs may request reconsideration of a conditional accreditation decision or of a decision refusing accreditation.

Central to this guide is the ongoing dialogue between the HEI and the accreditation team during the accreditation process. In addition to this ongoing dialogue, there are formal consultations during the accreditation process where the HEIs can have their say, including the opportunity to raise complaints. Complaints can be filed against the work of the accreditation panel and the accreditation team. Formal complaints are to be filed with the Head of Secretariat. The formal consultations are:

- The composition of the accreditation panel. The HEIs can complain about the composition of the panel before the panel members are appointed.
- The portrait of the HEIs prepared by the accreditation team.
- The draft accreditation report.
- A draft decision from the Accreditation Council that does not follow the accreditation panel's recommendation. This applies only when the Council's decision is unfavourable to the HEI, or when new information or external assessments unknown to the HEI are included in the basis for the decision.

The HEI will be heard on a draft of the overall accreditation report and the accreditation panel's recommendation. The accreditation panel will process the HEI's consultation responses and make any necessary adjustments to the report. Before the Council meeting at which the matter is to be discussed, the HEI will normally receive the final accreditation report from the Secretariat. The report is sent approximately two weeks prior to the Council meeting to the HEI. If the HEI disagrees with the final report's assessments and recommendations, it may appeal directly to the Accreditation Council and explain the criticism before the case is discussed at the Council meeting. The HEI can also use the possibility to express its statement on the final version of the report that is sent to it on a hearing (approximately two weeks before the Council meeting). The inquiry will be included in the Council's consideration and processing of the case.

The appeal should be sent to the Council. The Council will then discuss the appeal and decide whether to reconsider the case.

Once the Accreditation Council has made its decision, the HEIs have two options, depending on the content and nature of the appeal:

- Request to the Accreditation Council to reconsider a decision (academic content)

According to the Accreditation Council's rules of procedure, HEIs may request the Accreditation Council to reconsider a decision or appeal against the decision on conditional positive accreditation or refusal of accreditation if they disagree with the academic content or professional assessments forming the basis of the decision. The Reconsideration Committee assesses the accreditation decision based on a reconsideration request.

The Reconsideration Committee is an ad-hoc body set up for each case and assesses the accreditation decision based on a reconsideration request. The Council may decide that other matters, beyond those addressed in the request for reconsideration, may be included in the assessment. The Reconsideration Committee can recommend the Council to reconsider the decision, and the Council can then decide whether the decision should be upheld or amended.

The Reconsideration Committee has a permanent chair who is appointed for 4 years. The former rector of VIA University College has had this position since February 2025. Other members of the reconsideration committee are appointed on an ad-hoc basis based on the following criteria: one person is appointed on the basis of recommendations from the six rectors' conferences for HEIs, one person is appointed on the basis of recommendations from the student organisations for higher education and the last member is appointed from among the ordinary members of the Council. During interviews, it was examined why it was necessary to ensure that one seat on the Reconsideration Committee was reserved for one of the ordinary members of the Council. The agency staff and management explained the advantage to ensure that the context of the appealed decision is well understood and explained.

- Complaint to the Minister for Education and Research (legal issues)

HEIs may appeal against legal issues arising from the Council's decisions within 14 days. The term "legal issues" refers to whether the case has been handled in accordance with the applicable law. The Ministry (Danish Agency for Higher Education and Science) processes the appeal. If the Danish Agency for Higher Education and Science concludes that the decision is vitiated by a significant legal defect, the Council's decision may be annulled. In that case, the Council will have to reconsider the matter.

The Danish Agency for Higher Education and Science cannot reverse the DAC's decision. Under section 29/2 of the *Act on the Accreditation of Institutions of Higher Education*, the Minister may set the rules for the right to appeal, including provisions that certain decisions shall not be subject to appeal. Regarding the limitations and who may exercise the authority to assess complaints and appeals, it was clarified during the meeting with the ministry representatives that there was a factual error in the ministerial order, which would be corrected to ensure that there were no limitations on the right to appeal. The panel found agreement among all involved that this was an unintended wording mistake, and there was no disagreement on the intended practice. The panel is therefore convinced that there are no limitations, and it is emphasised that the ministry cannot intervene or be called upon in cases where an appeal has not satisfied an HEI.

The appeals and complaints guide is available on the agency's website. During the site visit, it was confirmed that HEIs are aware of this appeals procedure, but they have not needed to exercise their right to appeal. To date, no appeals have been received or processed. There have been instances where institutions have had complaints in the accreditation process. As described in the guidelines on appeals and complaints, this has been directed to the Head of the Secretariat during the accreditation process and has typically resulted in extensive hearing responses to the Accreditation report at the formal hearing described above. In four cases in the last five years, the result has been that the panel's recommendation for the Council's formal decision and the comprehensive assessment of the HEI's quality work have been altered by the panel after the hearing of the report. Agency staff confirmed that decisions on complaints and appeals are published.

Analysis

There is evidence that the agency has formal internal mechanisms for handling complaints and appeals. The panel found that the drawn-up guidelines clearly state how and to whom complaints and appeals should be sent, and the process for handling them. With guidelines for complaints and appeals and the establishment of a Reconsideration Committee, the agency has a formalised and transparent process. The guide is published on the agency website, and during the site visit, it was confirmed that the HEIs are familiar with their possibility to raise issues of concern during the accreditation process and can appeal and have the decision reconsidered.

The Agency has, according to the recommendation from the previous review, created a new body (Reconsideration Committee) that handles the received appeals. The panel agrees that this will further safeguard the HEIs' rights and ensure fair decision-making. Although the representatives of HEIs (rectors and QA officers) did not find it problematic that there is a connection between decision-making in the Council and the Reconsideration Committee, the agency emphasised the importance of having someone on the Reconsideration Committee who is familiar with the accreditation process in question. The panel has carefully discussed and reviewed the setup and the reasoning behind it and found no concerns in the system. In line with the currently established practice in many ESG-aligned countries, a full separation of people could be argued, and thus the agency might consider reviewing the presence and the function of the ordinary Council member in the Reconsideration Committee.

Panel suggestions for further improvement

4. The review panel suggests that the agency review the presence and function of the ordinary Council member in the Reconsideration Committee.

Panel conclusion: compliant

ENHANCEMENT AREAS

ESG 3.4 THEMATIC ANALYSIS

As specified in the Terms of Reference for the current review, DAC identified ESG 3.4, Thematic Analysis, as the focus of the enhancement-oriented component of the targeted review. In an additional document submitted alongside the agency's self-assessment report, DAC clarified the rationale for choosing this enhancement area, highlighting its main challenges and ambitions. While the Accreditation Council's Secretariat already has experience and a portfolio of thematic analyses, it indicated an interest in exchanging perspectives with the review panel to further stimulate and inform its work. To this end, DAC outlined several topics and guiding questions to support the panel's understanding of the agency's intentions to strengthen the relevance and impact of its thematic analyses, taking into account recent organisational changes that have constrained the resources available for this activity.

Considering the requirements of DAC, the panel designed an enhancement session that would be of practical value to the agency. It was therefore proposed to organize a 75-minute workshop with participants nominated by the agency. Chaired by the panel chair and facilitated by panel members, the workshop brought together senior agency advisors, representatives of higher education institutions, students, and members of the business community.

Workshop organisation

The workshop was conceived as a participatory, forward-looking exercise to identify practical, proportionate, and impact-oriented ways to enhance DAC's thematic analysis approach, in line with ESG 3.4.

The workshop was structured to integrate expert input, stakeholder reflection, and collective ideation, ensuring both conceptual clarity and operational relevance. Following a brief framing by the panel chair, the panel presented a shared understanding of thematic analysis as defined under ESG 3.4, emphasising its role as a systematic and purposeful process that supports the enhancement of the agency's own QA processes, institutional quality improvement, and transparency and knowledge-sharing within the higher education system.

The panel then presented various European approaches to thematic analysis, including: thematic analysis as a strategic and continuous function, innovative methodologies such as systematic mining of accreditation materials, diversified communication formats beyond traditional reports, and explicit strategies for linking thematic findings to QA criteria, procedures, and sector dialogue.

Participants subsequently engaged in mixed triad reflections on three key questions: 1)-What does the sector need, and how can the Danish Accreditation Council better support it? 2)- What challenges limit the impact or visibility of thematic analysis outputs? 3)- What are the data and sources the DAC could make use of for TA, other than reports?

Based on the collected reflections, a carousel of ideas was organized into three thematic stations: 1) relevance to the sector and society, 2) impact and visibility, and 3) the realistic use of data under resource constraints.

The session concluded with a plenary synthesis and an invitation for DAC to select one pilot innovation for future testing.

Panel observations and comments

- **Relevance of thematic analysis for the sector and society**

The mixed triads discussions underscored a clear need for forward-looking, practice-oriented quality assurance that helps institutions anticipate and respond to emerging challenges. Participants emphasised the importance of a more strategic use of thematic analysis, particularly given the closure of the Danish Evaluation Institute (EVA), which has heightened expectations for DAC to provide sector-wide insights beyond individual accreditation decisions.

Key needs include stronger knowledge sharing and dissemination of good practices, especially peer-based examples with high usability at the programme level. Institutions value cross-sectoral learning from accreditation processes, including exchanges between universities and professional colleges, and see clear benefits in programme evaluations supported by external experts.

The sector also expects DAC to play a guiding role in addressing new and complex themes, notably artificial intelligence and its implications for teaching, learning, assessment, and quality assurance. This includes “looking into the crystal ball” to identify future QA-relevant themes and translating broader European frameworks, such as the revised ESG, into a meaningful Danish context, for example, through thematic work on student-centred learning.

At the same time, there is a strong demand for more focused, relevant, and practical thematic analyses, including minor or targeted studies. Topics of particular interest include programme progression, the practical use of EQA results at the programme level, new programme formats, and how institutions can integrate and assess core skills and competencies in line with evolving labour-market expectations.

Subsequently, the carousel of ideas revealed a shared expectation among stakeholders that DAC’s thematic analysis should move beyond internal reflection and contribute more visibly to sector-wide learning and societal relevance. Participants identified the Danish and European qualification frameworks, recent legislative changes, and cross-sectoral transitions as particularly fertile grounds for thematic exploration.

The panel notes positively that DAC has already experimented with dialogue-oriented formats, such as seminars on student-centred learning, which were highly valued by the sector. These experiences suggest that thematic analysis can act not only as an analytical tool but also as a convening mechanism, bringing together institutions, students, and other stakeholders around shared quality challenges.

At the same time, participants stressed the importance of closer institutional involvement in the thematic analysis process itself, including stronger links between thematic work, audit trails, and the sharing of good practices across institutions.

The panel considers that DAC has a solid basis for developing thematic analysis as a relevant and trusted source of sectoral insight, provided the agency further clarifies its intended audiences, societal contribution, and the feedback loops among analysis, dialogue, and QA processes. This could increase the agency’s relevance, as the sector looks to DAC to act not only as a regulator but also as a knowledge hub and facilitator, supporting continuous improvement through timely, relevant, and actionable quality assurance insights.

- **Impact and Visibility of Thematic Analysis Outputs**

A recurring theme throughout the workshop was the limited visibility and perceived impact of existing thematic analysis outputs. Workshop participants identified several factors. A concern was that reports are often too long and dense, limiting their usability for institutional leaders and practitioners. In an environment marked by information overload, lengthy written outputs risk being overlooked in managers' inboxes, regardless of their substantive value. There was broad agreement that shorter, more targeted outputs, such as micro-papers, webinars, and recorded explainers, would be more effective than long analytical reports.

Timing emerged as a critical challenge: thematic analyses are most effective when released at moments when institutions can actively use the findings, for example, when aligned with review cycles or directly linked to ongoing accreditation or audit themes. When such alignment is absent, the analyses' relevance and uptake diminish.

Participants also noted that the format and dissemination channels of thematic analyses significantly affect their reach. Reliance on traditional reports alone was considered insufficient. There is a need for more varied and interactive formats, such as webinars, seminars, or mini-conferences, that enable discussion, contextualization, and peer exchange, thereby increasing visibility and practical impact. Linking thematic findings more explicitly to dialogue-based formats, such as workshops or sector-specific quality conferences, was seen as a key lever to increase uptake and relevance.

The panel notes the strong emphasis placed on strategic partnerships, particularly with organisations such as the Danish Evaluation Institute (EVA) and DEA, and on better integration of student perspectives through networks such as STAR.

At the same time, the panel observes that DAC's challenge is not primarily a lack of analytical capacity but rather a matter of strategic communication and the positioning of thematic analysis. Participants identified a "hidden demand" in the sector, suggesting that thematic analysis may be underused not because it lacks relevance but because its formats and dissemination channels do not sufficiently meet stakeholders' needs. A clearer differentiation of target groups and formats would significantly enhance impact without requiring substantial additional resources.

- **Use of Data and Sources under Resource Constraints**

Workshop participants emphasised the need for a broader and more strategic use of diverse data sources to strengthen thematic analysis. Existing large-scale datasets, such as the national student survey, were seen as a valuable but underutilised resource, with potential to be analysed in different ways to illuminate cross-cutting trends and systemic issues.

Participants also highlighted the importance of qualitative data, particularly through interviews with practitioners and external experts, for capturing contextualised insights that are not always visible in formal documentation. Emerging possibilities include the use of artificial intelligence-supported tools, such as AI agents, to conduct or support structured interviews and data synthesis, thereby enhancing efficiency and analytical depth.

At the same time, the discussion of the potential use of artificial intelligence tools to analyse qualitative and quantitative data was noteworthy. While participants acknowledged both opportunities and risks, there was broad agreement that exploratory, partnership-based approaches, possibly involving HEIs, could help DAC test innovative methods without overextending its internal capacity.

In addition, international practices and comparative perspectives were seen as valuable sources, allowing DAC to benchmark Danish developments and identify transferable lessons from other quality assurance systems.

The workshop confirmed that DAC has access to a rich ecosystem of existing data, including accreditation materials, site visit insights, national surveys, statistical data, and international analyses. The key challenge identified was not data availability, but the systematic selection, connection, and interpretation of data in a resource-efficient manner.

More emphasis could be placed on cooperation with higher education institutions and stakeholders in co-defining thematic questions, thereby ensuring relevance while sharing the analytical burden. Qualitative approaches, such as interviews with practitioners and experts, were seen as particularly valuable when combined with existing quantitative data.

The panel considers that DAC is well-positioned to adopt a project-oriented, incremental approach to thematic analysis, prioritising feasibility and learning over comprehensiveness. Expanding thematic analysis beyond reports, by combining surveys, interviews, digital tools, and international insights, would significantly enhance the relevance, robustness, and strategic value of DAC's analytical outputs for the sector.

Panels' reflections

The choice for ESG 3.4 Thematic Analysis as an enhancement standard reflects both the maturity of the agency's core external quality assurance (EQA) activities and its ambition to further strengthen its system-level contribution to quality development in Danish higher education and society at large.

DAC already generates substantial qualitative and quantitative information through accreditation, audits, and institutional reviews. However, as the agency itself recognised and confirmed during the review process, the systematic consolidation, interpretation, and outward communication of this information through thematic analysis remains an untapped area of potential. In particular, the review highlighted opportunities to improve the strategic use, visibility, and impact of thematic analysis outputs, while remaining realistic about the agency's limited resources.

The review panel commends DAC's clear commitment and strong potential to enhance its thematic analysis in line with ESG 3.4. The workshop confirmed a shared understanding among stakeholders that thematic analysis can become a high-impact, low-burden instrument for system-level learning, provided it is strategically focused, methodologically pragmatic, and communicatively agile.

The agency is encouraged to view thematic analysis not as an additional task, but as a connecting function, linking evidence, dialogue, and enhancement across its quality assurance activities and the broader Danish higher education ecosystem.

In this regard, based on the review process and the outcomes of the enhancement workshop, the ENQA review panel has formulated a set of suggestions for the Danish Accreditation Council, as presented below.

Strengthen the strategic positioning of thematic analysis

DAC is encouraged to articulate the strategic purpose of thematic analysis more explicitly, including its contribution to sector development and societal relevance. This could include defining a limited number of priority thematic areas aligned with national reforms, European developments, and identified sector needs.

Diversify formats and tailor outputs to target groups

DAC might consider moving beyond report-based dissemination and systematically experimenting with short, accessible formats such as thematic micro-briefs, webinars, and recorded explainers. Clear differentiation of target audiences (institutions, students, policymakers, or secondary education) could guide format choices.

Embed thematic analysis more strongly in core QA processes

DAC could further strengthen the links between thematic analysis and its core accreditation and audit processes, including the systematic use of audit trails and accreditation insights as thematic inputs, and the use of thematic findings to inform revisions of criteria or procedures.

Enhance stakeholder involvement and partnerships

The panel believes that deeper involvement of HEIs, students, and external partners would be valuable for both defining thematic questions and disseminating results. This includes more systematic use of student networks, such as STAR, and structured opportunities for cross-sectoral exchange.

Pilot a feasible innovation scheme in the future

In line with the workshop's conclusion, DAC is encouraged to select one pilot thematic analysis innovation, for example, a rolling thematic study, a micro-brief series, or a webinar-based thematic dialogue, and to test it in the future, at its earliest convenience, using the experience to inform further development.

CONCLUSION

SUMMARY OF COMMENDATIONS

1. The review panel commends the agency for the stakeholders' confidence in its activities, as demonstrated by ongoing dialogue, active participation in various activities, and involvement in the development of accreditation processes.
2. The review panel commends the agency for its commitment to staff professionalism and for maintaining high standards for external quality assurance activities during the transition period.
3. The review panel commends the agency's approach and process with the methodology development of IA 2.0 for the arts and culture institutions under the Ministry of Culture.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, DAC is in compliance with the ESG.

1. The review panel recommends that the agency closely monitor the implementation of the *Framework Agreement for secretarial services* and ensure it undergoes a thorough evaluation, thereby enabling the initiation of any necessary amendments.
2. The review panel recommends that the agency ensure that ESG 1.8 is addressed in the next cycle of institutional accreditation of the institutions of arts and culture.

SUGGESTIONS FOR FURTHER IMPROVEMENT

1. The agency is encouraged to further work together with the Ministry and explore ways to increase transparency among stakeholders regarding the appointment of Council members.
2. The review panel suggests that the agency communicate to stakeholders that independence is safeguarded in the new organisational setup and how this is achieved.
3. The review panel suggests that the agency monitor the impact of the extended period and consider creating a midterm process.
4. The review panel suggests that the agency review the presence and function of the ordinary Council member in the Reconsideration Committee.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
24 November 2025 - Online meeting with the agency's resource person			
1	10.00 – 11.00 (60 min)	Review panel's kick-off meeting and preparations for site visit (1 st part)	
2	11.00 – 12.00 (60 min)	An online clarification meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	DAC representative: Agency's resource person
3	12.00 – 12.30 (30 min)	Kick-off meeting (2 nd part)	
7 December 2025 – Day 0 (pre-visit)			
4	17.00-19.00 (60 min)	Review panel's pre-visit meeting and preparations for day 1	
5	As necessary	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting	
8 December 2025 – Day 1 Holbæk Room: Saturn, building nr. 9 The address is: Tidemandsvvej 1, Holbæk			
6	9.00 – 9.30 (30 min)	Review panel's private meeting	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
7	9.30 – 10.15 (45 min)	Meeting with the Chair of the Accreditation Council and Head of the Secretariat	• Chair of the Accreditation Council • Head of the Secretariat
	10.15 – 10.30 (15 min)	Review panel's private discussion	
8	10.30 – 11.15 (45 min)	Meeting with the team responsible for preparation of the self-assessment report	• Head of Section • Agency's resource person (Senior Advisor) • Senior Advisor
	11.15 – 11.30 (15 min)	Review panel's private discussion	
9	11.30 – 12.15 (45 min)	Meeting with agency staff 1	• 3 Heads of Section • 2 Senior Advisors • Special Advisor
	12.15 – 13.15 (60 min)	Lunch (panel only)	
10	13.15 – 14.00 (45 min)	Meeting with agency staff 2	• 3 Senior Advisors • 2 Heads of Section
	14.00 – 14.15 (15 min)	Review panel's private discussion	
11	14.15 – 15.00 (45 min)	Administrative staff (<i>hybrid</i>)	• 2 Heads of Section • Special Advisor • Senior Consultant, Agency for Higher Education and Science (<i>online</i>) • Special Advisor, Agency for Higher Education and Science (<i>online</i>)
	15.00 - 15.15 (15 min)	Review panel's private discussion	
12	15.15 - 16.00 (45 min)	Meeting with the Council members (<i>online</i>)	• Council member, University of Bergen • Council member, Rolvung and

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Brøndsted Architects • Council member, Director of Study programmes, Zealand Academy of Technology and Business • Council member, Executive Director of First Mind
13	16.00 - 17.00 (60 min)	Wrap-up meeting among panel members and preparations for day 2	
		Train to Copenhagen	
		Dinner (panel only)	
9 December 2025 – Day 2 Copenhagen Room no. K5.06 – Karre-building 5th floor (Karrebygning, 5. sal) <i>The Carlsberg Campus of KP, University College Copenhagen.</i> <i>The address is: Humletorvet 3, København</i>			
14	08.30 – 9.00 (30 min)	Clarification meeting about IA of HEI's of the arts under the Ministry of Culture	Agency's resource person
15	9.00 – 9.45 (45 min)	Meeting with students (representatives and participants in reviews) (<i>online</i>)	• Council student member and STAR-member • STAR-member • Former STAR-member • STAR-member and former student member of an accreditation panel • Former student member of an accreditation panel
	9.45 – 10.00 (15 min)	Review panel's private discussion	
16	10.00 – 10.45	Meeting with the Ministry representatives	• Head of Centre for Higher Education

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	(45 min)		Programmes • Senior Consultant, Centre for Higher Education Programmes • Special Advisor, Office of Research Security, Data Protection • Special Advisor, Office of Legal Affairs and Institutional staff
	10.45 – 11.00 (15 min)	Review panel's private discussion	
17	11.00 – 11.45 (45 min)	Meeting with quality assurance officers of HEIs	• Head of AU Education - Quality, Legality and Admissions, University of Aarhus • Head of Educational Development and Quality University College, VIA • Head of Study Administration, Rhythmic Music Conservatoire • Head of Quality, Fredericia Marine Engineering School • Head of Quality and Student Life, Business Academy Aarhus • Senior Consultant and Associate Professor, International Business Academy Kolding
	11.45 – 12.00 (15 min)	Review panel's private discussion	
18	12.00 – 12.45 (45 min)	Meeting with heads of some reviewed HEIs/ HEI representatives of HEIs	• Deputy Rector, University of Copenhagen • Deputy Dean, SDU • Deputy Rector, Copenhagen Business School • Dean, Copenhagen University College

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			• Director, University College Absalon • Rector, Business Academy Copenhagen • Rector, Business Academy Dania • Rector, Business Academy Zealand
	12.45 – 13.45 (60 min)	Lunch (panel only)	
19	13.45 – 15.00 (75 min)	Session to discuss chosen enhancement area ESG 3.4 (participants to be selected by the agency)	• Deputy Dean, SDU • Head of AU Education - Quality, Legality and Admissions, University of Aarhus • Head of Strategy and Quality, University College Copenhagen • Head of Educational Development and Quality University College, VIA • Rector, Business Academy Copenhagen • Rector, Business Academy Dania • Rector, Business Academy Zealand • Head of Quality and Student Life, Business Academy Aarhus • Senior Consultant and Associate Professor, International Business Academy Kolding • Director of Education, Diversity & Research, Danish Chamber of Commerce • Student member of the Council <u>Agency staff:</u> • 3 Senior Advisors
	15.00-15.15 (15 min)	Review panel's private discussion	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
20	15.15-16.00 (45 min)	Meeting with stakeholders, such as employers, local community, relevant partners	• Senior Consultant, Academic Central Organisation • Head of Education, Diversity & Research, Confederation of Danish Industry • Director of Education, Diversity & Research, Danish Chamber of Commerce
	16.00-16.15 (15 min)	Review panel's private discussion	
21	16.15-17.00 (45 min)	Meeting with representatives from the reviewers' pool (<i>online</i>)	• Former Deputy Rector and Vice Rector for academic affairs, Norwegian School of Economics, Research Director at Statistics Norway • Former Vice Rector, Umeå University, Associate Professor in design history and design theory, Umeå University • Director Vestegnen HF & VUC (Higher Preparatory Examination and Adult Education Centre) • Vice-Rector, Bergen School of Architecture • Former Director, Ministry of Higher Education and Science • Vice-Dean of Research at the Faculty of Social Sciences, OsloMet • Former Deputy Rector, VIA University College, Head Consultant Nordisk Praksis
	17.00-17.15 (15 min)	Review panel's private discussion	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
22	17.15-18.00 (45 min)	A session to further investigate additional topics that may arise during the site visit regarding agency's compliance with the ESG 2.1 and ESG 2.2. Clarification of the criteria, guidelines and procedure for HEIs of the arts and culture under the Ministry of Culture	• Agency's resource person • Senior Advisor responsible for the guidelines for institutions of arts and culture
23	18.00-19.00 (60 min)	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
		Dinner (panel only)	
10 December 2025 – Day 3 Copenhagen Please note: Room number is: W4.21 – Warehouse-building 4th floor (Warehouse-bygning, 4. Sal) The Carlsberg Campus of KP, University College Copenhagen. The address is: Humletorvet 3, København			
24	9.00 – 10.00 (60 min)	Meeting among panel members to agree on final issues to clarify	
25	10.00 – 11.00 (60 min)	Meeting with chair of the Accreditation Council and head of the Secretariat to clarify any pending issues	• Chair of the Accreditation Council • Head of the Secretariat
28	11.00 – 12.30 (90 min)	Private meeting between panel members to agree on the main findings	
	12.30 – 13.30 (60 min)	Lunch (panel only)	
27	13.30 – 14.00 (30 min)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	• Chair of the Accreditation Council • Head of the Secretariat • Staff members

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
28	14.00 – 14.30 (30 min)	Meeting between panel members and ENQA review coordinator: feedback and reflection on the visit, discussion on further work to be done	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Targeted review of Danish Accreditation Council (DAC) against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between DAC (applicant), ENQA (coordinator) and EQAR.

July 2025¹. Background

The Danish Accreditation Council - DAC (formerly Danish Accreditation Institution – AI⁸)

has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2010 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

The Danish Accreditation Council – DAC (formerly the Danish Accreditation Institution – AI) has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2010 and is applying for renewal of ENQA membership.

DAC is carrying out the following activities within the scope of the ESG:

- Institutional Accreditation (IA)⁹
- Programme accreditation (PA)¹⁰
- Institutional Accreditation for Institutions of Arts and Culture¹¹

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG:

- SU Vurderinger
- Niveau vurderinger

⁸ Until 30 June 2025

⁹ Accreditation of higher education institutions – as listed on the agency's entry on EQAR

¹⁰ Accreditation of higher education programmes – as listed on the agency's entry on EQAR

¹¹ This activity is considered as accreditation of higher education institutions (activity) on EQAR

- Assessment of providers of mandatory working environment courses

While these activities are not relevant to the application for renewal on EQAR, it is DAC's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

2. Purpose and scope of the targeted review

This review will evaluate the extent to which DAC continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support AI's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

a. ESG 2.7 – Complaints and Appeals

- Whether the agency has formal internal mechanisms for handling complaints and appeals

b. ESG 3.1 – Activities, policy and processes for quality assurance

- Whether the agency has started involving stakeholders (and students) in meaningful way in its governance

c. ESG 3.6 – Internal quality assurance and professional conduct

- Whether the agency has developed more systemic and better structured management of its internal QA processes

B) Standards 2.1 to 2.7 for the following activities:

a. n/a

C) Standards affected by other types of substantive changes:

a. ESG 3.3 – Independence

- Whether the recent changes have affected the agency's organisational and operational independence

b. ESG 3.5 – Resources

- Whether the agency still has adequate and appropriate resources, both human and financial, to carry out its work

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.4 Thematic Analysis

- F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, DAC and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by DAC including the preparation and publication of a self-assessment report;
- A site visit by the review panel to DAC;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to DAC during the past 5 years, and conversely DAC has not provided any remunerated or unremunerated services to the coordinator.

3.2 Nomination and appointment of the review team members

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative

of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide the agency with the proposed panel composition and the curricula vitae of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, the coordinator will inform EQAR about the appointed panel members.

3.3 Self-assessment by DAC, including the preparation of a self-assessment report

DAC is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);

- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which DAC fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to DAC at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR¹².

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If DAC chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by DAC and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to DAC the [Declaration of Honour](#) together with the final report.

4. Publication and use of the report

DAC will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final

¹² See here: <https://www.eqar.eu/assets/uploads/2025/01/EQAR-UseInterpretation-v4.0.pdf>

validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in spring 2026. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	April 2025
Appointment of review panel members	May 2025

Self-assessment report (SAR) completed by DAC	12 September 2025
Screening of SAR by ENQA Review Coordinator	September 2025
Preparation of site visit schedule and indicative timetable	October 2025
Briefing of review panel members	November 2025
Review panel site visit	December 2025
Submission of the draft review report to ENQA Review Coordinator	End January 2026
Factual check of the review report by the DAC	February 2026
Statement of DAC to review panel (if applicable)	February 2026
Submission of review report to ENQA	February/early March 2026
Validation of the review report by the Agency Review Committee	April 2026
EQAR Register Committee meeting and decision on the application by DAC	Spring 2026
Decision on ENQA membership by the ENQA Board	Spring 2026

ANNEX 3: GLOSSARY

AI	Accreditation Institution
DAC	Danish Accreditation Council
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQA	External quality assurance
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
EVA	Danish Evaluation Institute
HE	Higher education
HEI	Higher education institution
IA	Institutional Accreditation
IQA	Internal quality assurance
KUM	Kunstneriske uddannelsesinstitutioner under Kulturministeriet/ Higher education institutions in the arts under the Ministry of Culture
PA	Programme Accreditation
QA	quality assurance
RUVU	Advisory Committee to Assess the Range of Higher Education Study Programmes Offered
SAR	Self-assessment report
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY DAC

Self-assessment report (SAR) with the following annexes:

Annex 1 EQA activities within the scope of ESG

Annex 2 The Act on the Accreditation of Institutions of Higher Education of 12 August 2021 (in Danish)

Annex 3 Bill on amendments to the Act on the Accreditation of Institutions of Higher Education including explanatory notes as submitted by the Minister for Higher Education and Science to the Danish Parliament on 26 February 2025 (in Danish)

Annex 4 Amendments to the Act on Accreditation of Institutions of Higher Education as adopted by the Danish Parliament on 20 May 2025 (in Danish)

Annex 5 Quality Policy for the Accreditation Council's (in Danish)

Annex 6 Evaluation of the institutions' resource utilization and development orientation in the second cycle of institutional accreditation secretariat (in Danish)

Supplementary Documents provided by DAC:

Flow chart

Present Members of the Danish Accreditation Council and the new appointed members of DAC

Table of IA

Procedure Handbook

IA 2.0 Report template

Writing guide

Signed Framework for secretarial services to DAC

Thematic analysis, Quality of education in small, decentralised campuses (machine translation)

Thematic analysis, Gender in higher education (machine translation)

Strategy for AI (until 2028) (machine translation)

Quality Policy updated June 2025 (machine translation)

Appeals and complaints, machine translation with corrections

Table KUM criteria corresponding ESG

Ministerial order HEIs under the Ministry of Culture 2016 (Danish)

Ministerial order HEIs under the Ministry of Culture 2025 (Danish)

Appointment of student members for The Accreditation Council

Guidance on institutional accreditation – Higher education institutions under the Ministry of Culture (Danish and English)

Annex A: Members of the Danish Accreditation Council as of January 1, 2026

Annex B: The Act on the Accreditation of Institutions of Higher Education of 12 August 2021
(Machine translation with selected unofficial proofread text)

Annex C: Bill on amendments to the Act on the Accreditation of Institutions of Higher Education including explanatory notes as submitted by the Minister for Higher Education and Science to the Danish Parliament on 26 February 2025 (Machine translation with selected unofficial proofread text)

Annex D: Amendments to the Act on Accreditation of Institutions of Higher Education as adopted by the Danish Parliament on 20 May 2025 (Machine translation with selected unofficial proofread text)

Annex E: Additional description of the regular feedback meetings

Annex F: Minutes from a general meeting, January 16, 2025.

Annex G: Minutes from a general meeting, January 16, 2025 (Machine translation - not proofread)

Annex H: The Secretariat's internal development report (Danish)

Annex I: The Secretariat's internal action plan (Danish)

OTHER SOURCES USED BY THE REVIEW PANEL

ENQA AI Review Report 2021

Website Accreditation Institution and Accreditation Council

ENQA TARGETED REVIEW 2026

THIS REPORT presents findings of the ENQA Targeted Review of the Danish Accreditation Council (DAC), undertaken in 2025.