
ENQA AGENCY REVIEW: NORWEGIAN AGENCY FOR QUALITY ASSURANCE IN EDUCATION (NOKUT)

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Contents

EXECUTIVE SUMMARY.....	3
INTRODUCTION.....	5
BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS.....	5
BACKGROUND OF THE REVIEW	5
MAIN FINDINGS OF THE 2013 REVIEW	5
REVIEW PROCESS	5
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY	7
HIGHER EDUCATION SYSTEM	7
QUALITY ASSURANCE	8
THE NORWEGIAN AGENCY FOR QUALITY ASSURANCE IN EDUCATION (NOKUT).....	9
NOKUT'S ORGANISATION/STRUCTURE	10
NOKUT'S FUNCTIONS, ACTIVITIES, PROCEDURES	13
NOKUT'S FUNDING	15
FINDINGS: COMPLIANCE OF NOKUT WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG).....	16
ESG PART 3: QUALITY ASSURANCE AGENCIES	16
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	16
ESG 3.2 OFFICIAL STATUS	19
ESG 3.3 INDEPENDENCE	19
ESG 3.4 THEMATIC ANALYSIS	21
ESG 3.5 RESOURCES	23
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	24
ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES.....	25
ESG PART 2: EXTERNAL QUALITY ASSURANCE	27
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE.....	27
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	30
ESG 2.3 IMPLEMENTING PROCESSES.....	32
ESG 2.4 PEER-REVIEW EXPERTS	36
ESG 2.5 CRITERIA FOR OUTCOMES	38
ESG 2.6 REPORTING	39
ESG 2.7 COMPLAINTS AND APPEALS.....	40
CONCLUSION	42
SUMMARY OF COMMENDATIONS	42

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS	42
SUGGESTIONS FOR FURTHER DEVELOPMENT	43
ANNEXES	45
ANNEX 1: PROGRAMME OF THE SITE VISIT	45
ANNEX 2: TERMS OF REFERENCE OF THE REVIEW	47
ANNEX 3: GLOSSARY	52
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW	53
DOCUMENTS PROVIDED BY NOKUT	53

EXECUTIVE SUMMARY

This report analyses the compliance of the Norwegian Agency for Quality Assurance in Education (Nasjonalt organ for kvalitet i utdanningen, NOKUT) with the 2015 Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). NOKUT was established in 2002 as the agency responsible for external quality assurance of Norwegian higher education. It is a European Association for Quality Assurance in Higher Education (ENQA) Member agency and has been listed in the European Quality Assurance Register for Higher Education (EQAR) since 2014. This is NOKUT's third external review against the ESG and the second coordinated by ENQA for the purpose of reconfirming its ENQA membership. This external review report is the result of the review process based on NOKUT's self-assessment report and an external assessment including a site visit of the ENQA appointed review panel in Oslo, Norway, in February 2018.

NOKUT is tasked with external quality assurance of all Norwegian higher education, and does not conduct any quality assurance activities outside of the Norwegian higher education system. The review panel analysed five of NOKUT's activities considered to be within the scope of the ESG: institutional quality assurance audit, institutional accreditation, initial programme accreditation, revision of institutional accreditation and revision of programme accreditation. The panel also looked at the pilot project on Combined Education and Research Evaluations as an activity within the scope of the ESG, but did not make any judgments on the activity because it is a pilot which has not been finalised at the time of the review (no reports have been published yet). NOKUT's external quality assurance activities within the scope of the ESG are understood in Norway as part of NOKUT's wider task of supervising the quality of Norwegian higher education. The task also includes collecting information on the sector used in an interlinked model of external quality assurance. While institutional audits are conducted in 6-8-year cycles and initial accreditations on demand, NOKUT uses risk assessment to launch revisions. Revisions follow a supervision procedure, which is not an activity within the scope of the ESG, but the review panel has commented on it in the report as far as it is part of the interlinked model and relevant for other activities.

The panel found that NOKUT is much appreciated by its stakeholders as a quality assurance agency as well as the institution providing valuable information on the Norwegian higher education system. NOKUT is an exemplary national quality assurance agency in many aspects of its work, and the panel was able to commend a number of its practices. The commendations concern its public role of a promotor of quality in Norwegian higher education (ESG 3.1), its work on collecting, analysing and disseminating information on the sector (ESGs 3.1 and 3.4), its evolving internal quality assurance system (ESG 3.6), its interlinked model of quality assurance which avoids over-burdening the institutions (ESG 2.2) and its efforts to improve the readability of the reports it publishes (ESG 2.6).

The panel also looked at the way NOKUT has implemented the recommendations from the previous, 2013 external review. NOKUT was successful in improving its non-conflict of interest documents as well as piloting the student involvement in bachelor and master initial programme accreditations, which are not required by the legal framework to include students. It has invested efforts into improving the audit procedure, with the new cycle of audits starting in 2017. The panel found that NOKUT was not fully successful in implementing the follow-up procedures recommended by the 2013 review and thus judged NOKUT as partially compliant with the ESG 2.3. Additionally, the panel found that there was space for improvement regarding the publishing of thematic analyses, and thus judged NOKUT to be substantially compliant with the ESG 3.4. The panel judges NOKUT fully compliant on all other standards and has thus judged the agency to be substantially compliant with the ESG overall.

NOKUT is an integral part of a higher education system that has undergone a number of changes in the period since 2013, which was also reflected in changing NOKUT's regulations and procedures.

These focus on increasing institutional autonomy in implementing the part 1 of the ESG while leaving room for risk-based intervention on the part of NOKUT. NOKUT was an active stakeholder in these changes and the agency based amendments of its own procedures on the evidence it collects, the recommendations of the external reviews and its vast experience in working with the sector. Thus, the panel's recommendations for further improvement listed under ESG standards 2.2, 2.4, 2.6 and 2.7 focus on the details of NOKUT's procedures rather than any major interventions to its current system of external quality assurance.

INTRODUCTION

This report analyses the compliance of the Norwegian Agency for Quality Assurance in Education (Nasjonalt organ for kvalitet i utdanningen, NOKUT) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in 5 months from December 2017 to April 2018. The review was commissioned in view of the agency's wish to reconfirm its membership of ENQA and its listing in EQAR.

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 substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is NOKUT's third external review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2013 REVIEW

The 2013 review panel concluded that in its work NOKUT is fully compliant with the majority of ENQA membership standards and recommended to the Board of ENQA that NOKUT should have its Full Membership of ENQA confirmed for a further period of five years. EQAR listed NOKUT on the basis of the same report.

In the 2013 Report¹ the Review Panel congratulated NOKUT's determination to use its control and supervisory powers for further development of HEIs and enhancement of the quality of their provision and recommended to the agency that it:

- Strengthens further its audits in order to fully address the ESG Part 1 by guiding evaluation panels and institutions regarding the kind of processes and procedures they are expected to devise in order to improve the standards of their awards and the quality of learning opportunity for their students
- Introduces options for follow-up of recommendations in evaluation reports in order to monitor more closely developments in quality assurance systems and study programmes. This is particularly important with the view of the fact that NOKUT accredits on the basis of ex ante evaluation of new programmes and the validity of accreditation is not time- limited
- Considers how to make sure that students' contributions add value to the work of experts' panels and they are well supported by an adequate to their needs training
- Defines the non-conflict of interest it applies in its procedures for nomination and appointment of experts, which would help both its experts and the institutions under review to easily detect and prevent cases of conflict of interest.

REVIEW PROCESS

The 2018 external review of NOKUT was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NOKUT was appointed by ENQA and composed of the following members:

- Tue Vinther-Jørgensen (Chair), Chief Consultant, Ministry of Higher Education and Science, quality assurance professional (ENQA nominee), Denmark

¹ <http://www.enqa.eu/wp-content/uploads/2014/01/Final-ENQA-Panel-Report-of-Review-of-NOKUT-2013.pdf>

- Đurđica Dragojević (Secretary), Head of the Department for International Cooperation, Croatian Agency for Science and Higher Education (ASHE), quality assurance professional (ENQA nominee), Croatia
- Terhi Nokkala, Senior Researcher, Finnish Institute for Educational Research, University of Jyväskylä, Academic (EUA nominee), Finland
- Hermann Blum, Master student at the Swiss Federal Institute of Technology, Zurich, Student (ESU nominee), Germany

Paula Ranne from the ENQA Secretariat in Brussels served as coordinator for the review.

NOKUT produced a self-assessment report, which provided a substantial portion of the evidence that the panel used to draw its conclusions. The panel conducted a site visit to validate fully the self-assessment and clarify any points at issue. Finally, the review panel produced the present final report on the basis of the self-assessment report, additional documents received, site visit and its findings.

Self-assessment report

The review was conducted in good cooperation with NOKUT. The agency provided a comprehensive and informative self-assessment report (SAR) which contains an overview of the development of Norwegian higher education and quality assurance in this field, with detailed presentations of NOKUT's work and quality assurance procedures. The analysis of compliance contains both evidence and NOKUT's self-reflection regarding each of the ESG standards. In addition to the 7 documents attached to the SAR, including the relevant legislation and NOKUT's strategic documents, additional links to documentation were provided in the SAR.

The SAR was primarily written by two of NOKUT's staff with the support of one senior advisor and one section head. Other experienced NOKUT staff were able to comment on drafts. Stakeholder input was assured through NOKUT's Board, who discussed the report while it was being produced and commented on the final draft. The SAR was submitted to ENQA in December 2017.

Site visit

The panel visited NOKUT at the beginning of February 2018. The panel and NOKUT arranged for 2 and a half days visit starting on Tuesday, February 6, and ending on Thursday, February 8. The panel met on Monday, February 5, to prepare for the visit. It also arranged for a pre-meeting with NOKUT's Director General, Head of Quality Assurance and NOKUT's coordinator for the review. The programme for the site visit was comprehensive and NOKUT did their best to assure stakeholder representation. The site visit was very well organised overall, and NOKUT staff were very helpful in delivering additional documentation and supporting the panel in its work. The programme of the site visit with the names of people met can be found in Annex 2 of this report.

The programme included 12 meetings with:

- NOKUT Director General and management
- NOKUT staff, including people responsible for the SAR, and heads and staff of departments tasked with analysis, evaluation, audits and accreditation
- HEI representatives, including 3 vice-rectors, 1 rector and 2 of administrative staff in charge of quality assurance
- Representatives of the Ministry of Education and Research
- NOKUT reviewers
- Representatives of stakeholders, including representatives of Norwegian Association of Researchers, Confederation of Unions for Professionals, Confederation of Norwegian Enterprises and Norwegian Association for Higher Education Institutions
- Representatives of the Norwegian Union of Students and student reviewers

- Representatives of NOKUT's Board

The interviews were open and frank and useful to the panel in clarifying details and receiving input on NOKUT's work. The final wrap-up meeting was held in a common area, with the presence of all members of the Board, NOKUT management and a number of staff.

Review report

The review panel had a final meeting at the end of the site visit to discuss the conclusions and the drafting of the report, which was then produced by the secretary with active cooperation of the rest of the panel and support by the review coordinator. The draft was sent for factual comments to NOKUT on April 19, 2018, with the comments received on May 3rd. and the final version was submitted to ENQA on May 11th, 2018.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The Norwegian higher education system is characterised by its public nature and funding system for all higher education institutions, public and private. Norway implemented the Bologna process in 2003 through the so-called Quality Reform. A major goal of this reform was for institutions to provide more feedback and academic counselling to their students as a means to increase student success through higher completion rates, faster graduation and improved learning outcomes.

The Act of 1 April 2005 relating to Universities and University Colleges (U&UC Act) regulates all Norwegian higher education institutions (HEIs). It guarantees their institutional autonomy and regulates how institutions are governed. The Act also covers students' rights, obligations and representation, student admission, teaching, examinations, appeals procedures and the appointment of staff. The government implemented a structural reform in 2013, which led to a series of mergers and takeovers within the higher education sector. The 79 higher education institutions reported at the end of 2012 have become 55, with the number decreasing each year due to further restructuring. Norway thus currently has 55 higher education institutions: 8 universities, all public, 8 specialised university institutions, 3 of which are private, and the rest are university colleges, both public and private. The U&UC Act and the connected Ministerial Regulations (Sections 3-5 to 3-8), define the difference between these 3 types of institutions in the level of programmes they can self-accredit, and the number of disciplines in which they can do so.

In total, there are 26 private institutions. All public and most private higher education institutions receive public funding. A large majority of the total of about 290 000 students attend public institutions without tuition fees. A large majority of private institutions are small and often specialised within a specific academic field. The structural changes have led to an increase in students enrolled in universities and a subsequent decrease in students enrolled in university colleges. However, the mergers have not led to any significant shift in the share of students enrolled in public institutions vs. private institutions. About 15 percent of students are enrolled in private institutions, and about 50 percent of these students are enrolled in private specialised university institutions. For the public HEIs, the changes have been more significant. In 2013, 42 percent of students were enrolled in public universities, whereas in 2017 this number was 52 percent. At the same time, enrolment at public specialised university institutions and university colleges dropped from 43 to 33 percent.

The national budget for 2017 allocates NOK 36.5 billion (3.9 billion euro) to HEIs. In October 2017, the government announced a proposed national budget for 2018 that allocates NOK 37.9 billion (4 billion euro) for HEIs, an increase of 3.8% nominally. Norway has a combined basic and result- and incentive-based funding model for HEIs. The model is divided into three components:

- The largest share of the total allocation is the basic component, which is intended to support stability and selected priorities.
- The education component is subject to educational results such as ECTS production and international student exchange.
- The research component is subject to research results, measured by indicators for scientific publishing, Ph.D. candidate production and acquisition of research funds.

QUALITY ASSURANCE

Quality assurance in Norwegian higher education is a dual responsibility. All HEIs are responsible for the quality of their own educational provisions, and it is NOKUT's responsibility to ensure that all institutions follow the legal requirements and provide education of high quality. NOKUT is the only institution responsible for quality assurance of higher education (and tertiary vocational education). The U&UC Act regulates the quality assurance of higher education. Section 3-1 states that *Accreditation is understood in the present Act to mean an academic assessment of whether a higher education institution or a study programme meets the standards and criteria set by the Ministry and NOKUT. Accreditation is a condition for the provision of higher education.* Accreditation is not limited to a specified period but is considered valid until explicitly revoked.

Institutional accreditation gives universities and colleges certain rights to award national degrees or diplomas. There are four categories of institutions, each with certain self-accreditation authority:

- University: authority to self-accredit at all levels, including doctoral programmes
- Specialised university institution: authority to self-accredit at all levels within their doctoral fields
- University college: authority to self-accredit at the bachelor degree level, but university colleges that have NOKUT accredited Ph.D. programmes can also accredit master programmes within their doctoral fields
- University colleges without institutional accreditation: for these university colleges, NOKUT must accredit all educational provisions

The system allows institutions to seek institutional accreditation in a different ('higher') category, following a process of institutional accreditation. Thus, a university college may apply to NOKUT for accreditation as a specialised university institution or a university.

The Act also guarantees the right of accredited institutions to establish programmes and award national degrees. In addition to institutional accreditation, NOKUT is responsible for accrediting all programmes that institutions cannot accredit themselves. Thus, new provisions in accredited institutions that go beyond the self-accreditation authority that follows from the institutional category must be accredited by NOKUT. The Ministerial Regulations also contain additional criteria for the accreditation of master and doctoral programmes, and requirements for documentation when institutions use their self-accreditation authority to establish new study programmes. The Ministerial Regulations require institutions to evaluate their study programmes periodically with the contributions of peer experts in order to assure the quality of their programmes and stimulate enhancement.

The right to self-accredit programmes is conditional upon a positive evaluation of the HEIs' internal QA system by NOKUT and the same is true of the right to submit new programmes to NOKUT. Chapter 2 of Ministerial Regulations obliges HEIs to organise internal quality assurance systems, and mandates NOKUT with checking if these comply with legal requirements at least once in 8 years. NOKUT does this through the audit procedure. Audit is also the only quality assurance procedure in the Norwegian system implemented in regular cycles. The audits cannot themselves lead to the loss of institutional accreditation, only the loss of rights to accredit new programmes. NOKUT has the right to launch

revisions of accreditation, both programme accreditation and institutional accreditation, which can lead to the loss of accreditation and consequently to the loss of public funding.

A separate institution, the Research Council of Norway, is responsible for evaluations of research. Another institution is being established to take over the administration of funding of developmental projects in education, including some currently administered by NOKUT. Professional and HEI associations serve as stakeholder bodies and do not conduct any quality assurance activities.

THE NORWEGIAN AGENCY FOR QUALITY ASSURANCE IN EDUCATION (NOKUT)

NOKUT was established with the revision of the U&UC Act in 2002 as an independent agency. The agency became operative on 1 January 2003. Section 2 of the Act empowers NOKUT as the only official quality assurance agency for Norwegian higher education with the task to *accredit institutions and study programmes, supervise the institutions' quality assurance practices and oversee that institutions and existing study programmes meet the applicable standards and criteria for accreditation*. In addition to higher education, NOKUT is also tasked with supervising tertiary vocational education, which means that it is responsible for supervising a total of about 4000 programs at 140 institutions in Norway.

As part of its supervisory role, NOKUT, which considers itself to be a knowledge-based organisation, collects large amounts of data on Norwegian higher education. It runs the national student survey (Study Barometer) which annually asks students about their perception of the quality of study programmes. It covers about 60 000 students in their 2nd year of study in both bachelor's and master's degree programmes. They are asked about various dimensions of quality in their study programme, such as quality of teaching, workload and career relevance. The data gathered in the Study Barometer is available on a separate website and NOKUT also makes all the raw data available to institutions. The second survey largely mirrors the student survey, but the respondents are academic staff at the same institutions.

In addition to the two surveys, in 2012 NOKUT created the 'NOKUT Portal' in cooperation with the Database for Statistics in Higher Education, to which Norwegian HEIs regularly report. The portal has two different missions, one for analysis and one for quality assurance activities. For the quality assurance activities, the portal currently contains 31 quality indicators. It selects and arranges relevant data for any one of NOKUT's types of external quality assurance procedures, concerning any specific institution at both programme and institutional level. In addition to being a source of information for NOKUT, the portal is also publicly available.

NOKUT also carries out evaluations and development projects and activities, with the aim of quality enhancement. These include:

- Euroma - an international pilot project in cooperation with UKÄ (Sweden) and NVAO (the Netherlands and Flanders) to identify subject-specific critical factors for achieving high quality in education at master level
- Advisory Programme for Teachers Education which advises teacher education programmes (for primary and secondary education) on their transition to five-year integrated master programmes
- Topic-Specific National Assessment Examinations – a testing programme NOKUT is still developing, with pilots already providing information about the students' level of knowledge. The programme was started in 2015 and in 2016, national assessment examinations were held in the bachelor's programme in auditing and accounting, mathematics and didactics in the teacher education programmes, and in anatomy, physiology and biochemistry in the bachelor's programme in nursing.

In addition to contributing to overall objectives of securing and enhancing the quality of higher education in Norway, NOKUT finds these activities central for developing its knowledge base, which is used in all supervision, revision and audit activities. Rather than relying only on self-reported information from HEIs and programmes, NOKUT uses the available data as an important data source in its quality assurance activities.

NOKUT also administers two incentive-based activities, which are however in the process of transfer to another institution. The Centres for Excellence in Education ('SFU-ordningen' in Norwegian) is a national initiative awarded to academic communities that have demonstrated excellent quality and innovative practices in education. The second initiative is the 'Educational Quality Prize', given each year to a study programme by the Ministry of Education and Research (with NOKUT deciding on the winner).

NOKUT also shares its expertise through seminars, conferences and breakfast seminars, attended by educational institutions and students as well as other authorities and interest groups. Analytical reports and evaluation results are distributed through newsletters, blogs, Twitter, podcasts, regular press releases and articles in the media. NOKUT also disseminates information about the Norwegian higher education system of quality assurance and enhancement through lectures and presentations in international cooperation projects and networks. Its international collaboration focuses on key Nordic and European networks and organisations and it also takes part in some multilateral and bilateral partnerships with other national quality assurance bodies.

On the Nordic level, NOKUT is a member of the Nordic Quality Assurance Network in Higher Education (NOQA), while on the European level, NOKUT is a member of ENQA and the EAIR - the European Higher Education Society, as well as a registered agency in EQAR. NOKUT is also involved on the international level in the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). In addition, NOKUT participates at international events such as the European Quality Assurance Forum and the EAIR Forum, and staff have regularly presented papers at these conferences. Active participation in ENQA has been an important part of NOKUT's European-wide engagement. NOKUT has been represented on ENQA's Board since 2012, as well as on the Internal Quality Assurance Working Group (ENQA-IQA). NOKUT also participates in a number of other ENQA events and in 2017, NOKUT hosted ENQA Members' Forum. In addition, NOKUT works with a number of other quality assurance agencies. NOKUT staff serve as board members and advisors for other European quality assurance agencies. Several staff members have acted as experts in higher education evaluations or served on expert committees abroad. NOKUT is also often host to visiting quality assurance agencies from other countries, and the department's staff members travel to other quality assurance agencies to learn and share experiences. NOKUT is also involved in international projects, such as the Euroma pilot project looking at master programmes in several European countries.

As Norway's ENIC/NARIC centre, NOKUT is also responsible for general recognition of foreign education. With more than 10 000 applications for recognition annually, about half of NOKUT's staff work in this field. Their tasks also include cooperation with other departments of NOKUT, as well as implementation of several Erasmus+ funded projects.

NOKUT'S ORGANISATION/STRUCTURE

The Board of NOKUT is regulated by the U&UC Act section 2-2. It is the agency's supreme governing body and formally possesses all of NOKUT's decision-making powers. Besides the decisions delegated to NOKUT's Director General, the Board retains decision-making powers over decisions on institutional quality assurance audits, institutional accreditations, programme accreditations at the Ph.D. level and the concluding decisions for all institutional or programme revisions of accreditation. This applies in

addition for all cases where an expert panel has not been able to reach a conclusion, which happens very rarely. The Board also decides on finance, strategy, reports and action plans and quality assurance criteria. The Board consists of eight full members, including the Chair, each appointed by the Ministry of Education and Research. The current Board members have the following background:

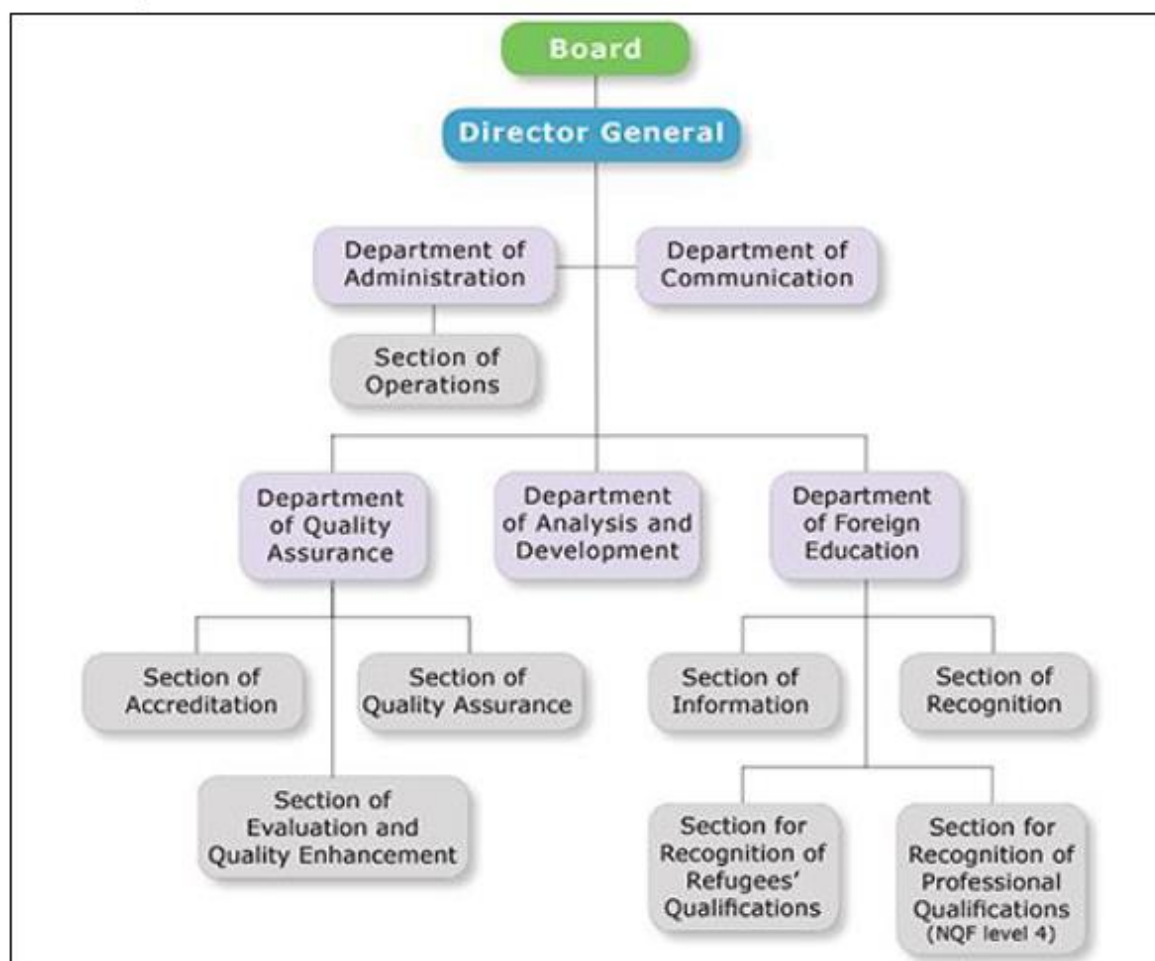
- the current chairperson and two other members are professors at higher education institutions, currently all Norwegian
- three of the current members represent business organisations, two of them Norwegian and one from the Danish Society for Education and Business
- one student representative from the National Union of Students in Norway (for higher education students)
- one student representative from the National Union of Students in Higher Vocational Education and Training in Norway
- one representative from NOKUT's staff – a ninth member who only has voting rights on matters relating to NOKUT's organisation and staff.

Appointment is for four-year terms, with the possibility of prolongation for another term. The Board's student members are appointed for two years. Members of the Board may not hold leading positions or elected office at Norwegian higher education institutions. The Board meets approximately six to eight times a year.

The head of NOKUT's Office is the Director General appointed by NOKUT's Board for a six-year term, with the possibility of prolongation for one more term. The Director General's function is prescribed in instructions from the Board, which delegates powers, such as decision-making in accreditations of bachelor and master programmes. Some of the powers delegated to the Director General are delegated further on to the Director of Quality Assurance.

NOKUT's **management group** consists of the Director General and the five Directors of each of NOKUT's departments. The Management Group is the Director General's main tool for steering and coordinating the activities of the Office. The Management Group meets once a week. NOKUT's departments are listed in the organigram below.

Picture 1: NOKUT's organisational chart (SAR, p.7)



NOKUT's **Department of Quality Assurance** is responsible for NOKUT's external quality assurance activities: institutional quality assurance audit, institutional and programme accreditation, monitoring activities, supervision and revision of accreditations. In addition, the Department also carries out projects with the purpose of enhancing Norwegian higher education and disseminating best practices. It comprises three sections:

- the Section of Accreditation, tasked with accreditation of institutions and study programmes, both within Norwegian higher education and tertiary vocational education (at the European Qualifications Framework –EQF- level 5).
- the Section of Quality Assurance, tasked with institutional quality assurance audits, revision of accreditations of institutions and study programmes and other supervision tasks such as thematic supervision projects, both within Norwegian higher education and tertiary vocational education.
- the Section of Evaluation and Quality Enhancement, which carries out evaluations and developmental projects and activities, with the aim of quality enhancement. This section was established in 2016 due to a growing number of enhancement activities in this field.

The main task of the **Department of Analysis and Development** is to maintain and develop NOKUT's knowledge base, described above. In addition, the Department is responsible for the Centres for Excellence in Higher Education and the Educational Quality Prize. The Department's outputs feed directly into the work conducted in other departments, especially the Department of Quality Assurance, and ensures that NOKUT's external quality assurance activities are based on up-to-date empirical knowledge.

NOKUT's **Department of Foreign Education** is Norway's ENIC/NARIC office and processes applications for recognition of foreign education. The Department is also the National Contact Point for the EQF.

The **Department of Communication** is in charge of and coordinates NOKUT's contact with the media and the public.

The **Department of Administration** works with human resources, NOKUT's budget and finances, NOKUT's (public) archive, IT and other supporting activities. NOKUT's quality assurance activities have benefited from IT development over the past years through the creation of a new online archive and quality handbook, and the current development of online application systems.

Various NOKUT's activities are summarized in the table below.

Table 1: Summary of NOKUT's activities (SAR, p. 19)

NOKUT's Activities		
Activity	What	Who
Conferences/ seminars	Breakfast meetings, conferences, seminars, workshops	Department of Communication, Department of Quality Assurance, Department of Analysis and Development
Financial incentives	Centres for Excellence in Education Initiative (SFU), Educational Quality Prize	Department of Analysis and Development
Supervision/ accreditation	Institutional quality assurance audit, accreditation/supervision/revision of programmes and institutions	Department of Quality Assurance
Knowledge base	Surveys, data portals, analysis, evaluations	Department of Quality Assurance, Department of Analysis and Development

NOKUT'S FUNCTIONS, ACTIVITIES, PROCEDURES

NOKUT is the sole agency responsible for external quality assurance of Norwegian HEIs, and it does not perform any cross-border quality assurance activities. Thus, NOKUT's activities have already been described in the chapter above as they are synonymous with the Norwegian system of quality assurance.

NOKUT's Academic Supervisions Regulations, the Ministerial Regulations, and certain national procedural requirements regulate the requirements for NOKUT's quality assurance activities.

NOKUT's quality assurance activities considered in this review are:

- Institutional quality assurance audit
- Institutional accreditation of institutions applying for a higher status as a university college, specialised university institution or university
- Programme accreditation of new programmes on the bachelor, master and Ph.D. levels
- Revision of programmes and institutions (re-accreditation of in-risk programmes and institutions)

In addition, two other activities are considered in the review, but the panel does not consider them to be separate quality assurance procedures in the sense of the ESG, are:

- Pilot project on Combined Education and Research Evaluations, which is currently implemented as an experiment and is not part of NOKUT's external quality assurance framework. The ToR of this review asked for it to be included if it is finalised by the time of the site visit, which was not the case as no reports have been produced yet.

- Supervision of programmes and institutions, which is a risk-based mechanism that can lead to revision, but not a stand-alone full procedure.

New programmes can be established on the bachelor, master and Ph.D. levels, and their requirements are prescribed in NOKUT's Academic Supervisions Regulations and in the Ministerial Regulations. Accreditation of new programmes is conducted either by NOKUT or by institutions with self-accreditation authority, based on the same set of programme requirements. Whether an institution must apply to NOKUT for accreditation of a new study programme, or whether it can self-accredit a new programme, depends on the institutional accreditation of the institution. The vast majority of new programmes are established based on an institution's authority to self-accredit. NOKUT only accredits study programmes for non-accredited university colleges on all levels and for university colleges or specialised university institutions that wish to establish a new doctoral or master programme outside their doctoral fields.

Non-accredited university colleges that wish to acquire self-accreditation authority or accredited institutions that wish to expand their authority can apply for institutional accreditation as a university college, as a specialised university institution and as a university, with different self-accrediting authorities as listed in the section on Quality Assurance above. Requirements for the various types of institutional accreditations comprise both common requirements that apply for all types of institutions and specific ones for each type.

At the centre of NOKUT's external quality assurance activities is the institutional quality assurance audit. All institutions must pass the audit periodically, regardless of whether they have institutional accreditation or only provide accredited study programmes. The aim of the audit is to verify whether the institution's internal quality assurance ensures educational quality and stimulates improvement. NOKUT also verifies whether the institution systematically conducts follow-up of the accreditation requirements for study programmes. An audit can reveal the need to carry out a supervision or revision of accreditation of a study programme or institution.

Supervisions have been developed in order to apply a more effective and targeted approach than revisions. They can be launched by NOKUT if quality deficiencies are detected through audits, by indications from the knowledge base and other sources of information, but also as a random exercise. A supervision can address one programme, a whole field of programmes, or a specific theme in all programmes in the whole sector, always using the same criteria as accreditation (all or only some of them). NOKUT can also supervise an institution, addressing all or relevant requirements for institutional accreditation. Supervision is conducted in various stages. Initial stages include an explorative and mapping stage, and an accounting stage where the institution is invited to provide further information. In a dialogue, NOKUT can work with the institution to clarify and to devise measures for correction and improvement when deficiencies are of a technical nature. For the final stage of supervision, NOKUT relies on external peer experts. This stage can involve a site visit. The final phase is a light version of a revision that usually only addresses specific criteria. Through supervision, NOKUT can require rectifications in order for programmes or institutions to comply with the requirements. However, a supervision cannot result in the revocation of a programme or institutional accreditation. Supervision is not a part of the ToR for this review, as it not an independent QA activity, but it is part of the Norwegian interlinked QA framework and discussed as such.

Some supervisions of programmes have revealed the necessity to revise programme accreditations. A programme or institutional revision is a comprehensive procedure that can result in the revocation of an accreditation and addresses not only specific but all accreditation requirements. NOKUT can revise both study programmes accredited by NOKUT, and those accredited by an institution with self-accreditation authority. NOKUT can do so at any time and for any reason, meaning that revision is a

strong counterpart to the trust-based system with broad self-accreditation authority. An example of a supervision that has resulted in the initiation of revisions is the supervision of institutions' external cooperation, which began in 2014 and is in its final stages. This supervision process resulted in revisions of 13 programmes that showed serious deficiencies in the accounting and dialogue stage of the supervision process.

The pilot project on combined education and research evaluations is not an integral part of this interlinked model. The ToR for this review asked for this procedure to be considered if it is finalised by the time of the site visit, which was not the case as no reports have been published yet. Thus, the panel decided to include it in the discussions, but the procedure was not considered for the assessment of NOKUT's current work. The pilot project is conducted in cooperation with the Research Council of Norway. It aims at developing a model for joint academic evaluation of education and research, and testing the model in conjunction with the Research Council's evaluation of Norwegian social science research. The overall objective of the joint evaluation is to develop a method that will allow NOKUT and the Norwegian Research Council to assess the quality of education and research and understand the interplay between them. The pilot will run from 2017 to 2018 targeting three social science disciplines in Norway, political science, sociology and economics. The model includes three sets of evaluations: an evaluation of research, an evaluation of education (which was being completed at the time of the site visit), and finally an evaluation of the interplay between research and education.

NOKUT'S FUNDING

NOKUT is fully funded by the Norwegian state budget, as determined and supervised by the Ministry of Education and Research. For details, see standard 3.5, Resources.

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

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.

Evidence

NOKUT's mission is set by Chapter 2 of the Universities and University Colleges Act (UC&C Act), Section 2-1, which states that *NOKUT's objective is to monitor the quality of higher education and tertiary vocational education, to recognize foreign higher education and to stimulate quality development that ensures that the institutions provide education at a high international level. NOKUT is part of efforts to ensure that society can have confidence in the quality of Norwegian higher education, tertiary vocational education and recognized higher education from other countries. In its work, NOKUT shall strive to assist the institutions with their development work.* It further lists NOKUT's activities regarding quality assurance: *to accredit institutions and study programmes, supervise the institutions' quality assurance practices and oversee that institutions and existing study programmes meet the applicable standards and criteria for accreditation.* NOKUT's activities are defined in further detail by the connected Ministerial Regulations, which re-state NOKUT's objective and define its role as a supervisor of quality of Norwegian higher education (Section 1-3). It is further stated (Section 1-5) that NOKUT's responsibilities are *to oversee that the institutions comply with the requirements set out in laws and regulations within NOKUT's administrative area of responsibility, (...)carry out targeted development work (...), provide guidance and advice in relevant areas (...), and to provide information to the sector and society at large (...)in accordance with international rules, standards and practices.* NOKUT's activities in higher education are listed (ibid.) as follows: *accredit institutions and study programmes, revise existing accreditations, carry out periodic supervision of the institutions' quality assurance practices and carry out evaluations in order to assess the quality of higher education.*

According to the SAR and site visit interviews, the institutional audit is the only quality assurance activity that is implemented cyclically at all higher education institutions, and two rounds of audits have been completed so far - the first from 2003 to 2011 and the second from 2009 to 2016. The third cycle of audits was initiated as a pilot in 2017, with the first 7 reports still to be completed and published at the time of the site visit, and ordinary audits will begin in 2019. Institutional and programme accreditations are conducted on demand. Since the previous review 4 institutional accreditations have been completed, in addition to 2 requests rejected and 3 procedures ongoing. Due to institutional mergers, the number of these procedures is expected to grow in 2018/19 to 5 to 10 and then to fall in the long run. For programme accreditations, NOKUT has performed 46 in 2016 and 25 in 2017. Revision is a risk-based measure, launched as a final attempt to remedy the quality of a programme or an institution, and since 2013 NOKUT has conducted 19 programme revisions. The previous ENQA review report called for the Ministry to enable NOKUT to rationalise the number of programme revisions. According to the SAR, NOKUT has achieved this through the development of a

‘lighter’ procedure, supervision, which starts as an exploratory exercise and leads to a revision procedures only if severe deficiencies are found which were not rectified during the supervision procedure. Since 2012, 5 supervisions have been performed – 1 at the institutional level, 3 with all programmes in a study field (humanities, social work and civil engineering) and 1 with all programmes delivered in institutional cooperation. The goals and objectives of these procedures are clear and defined in the legal framework – the UC&C Act, connected Ministerial Regulations and NOKUT’s Regulations concerning supervision of the educational quality in higher education of 9 February 2017, all of which are publicly available.

The legal framework is further operationalised in NOKUT’s strategies, with the current one valid for the period from 2015 to 2020 and developed in cooperation with stakeholders. The 2015-2020 Development Strategy (attached to the SAR and available online²) expects NOKUT to further its efforts in acquiring and disseminating information and supporting institutional development, improve the effectiveness of supervisory procedures and the organisation’s overall efficiency, competency and orientation towards its users. The activities to be performed in a year are additionally defined in the Ministry’s annual budget allocation letters and the implementation is monitored through NOKUT’s publicly available annual reports and other elements of the internal quality steering system.

The U&UC Act (Section 2-2) states that NOKUT’s Board will be appointed by the Ministry for a 4 year term, include 2 students (1 of which is a HE student; students have a 2-year term), and not include anyone leading a HEI supervised by NOKUT. The 6 members of the Board in addition to students are currently 3 professors from Norwegian HEIs and 3 business representatives (out of which 1 is Danish). A representative of NOKUT staff is also a Board member but with voting rights only regarding NOKUT’s organisation and staff.

The bulk of NOKUT’s work is conducted in Norwegian which makes the involvement of non-Scandinavian international experts difficult. However the Board does have a member from Denmark and experts from other Scandinavian countries are often used in the procedures.

During the site visit all stakeholders expressed their satisfaction with cooperation with NOKUT, and several mentioned mutual trust, dialogue and cooperation to be characteristic of ‘the Norwegian way of doing things’. In addition to the dialogue with stakeholders through meetings and events regularly organised by NOKUT and other stakeholders, the formal methods of involving stakeholders are public hearings and ‘reference groups’ for new regulations and activities, and regular surveys on their experience of working with NOKUT.

In addition to the ESG-related QA activities, the Ministry delegates NOKUT other tasks, usually first on project basis –such as conducting the combined research and education evaluation, and various other analytical and administrative tasks. NOKUT’s SAR (p.71) mentions as a potential threat that institutions do not understand well its role in development of institutions, in addition to just controlling them. This was also a finding of the 2016 stakeholder survey done as part of NOKUT’s strategic planning, and the issue was raised by the panel during the site visit. HEI representatives talked about the changing perception of NOKUT. Their view is that NOKUT has turned into a supportive agency from a pure controlling one, remaining in dialogue with the institutions and providing useful data on quality as well as quality incentives. The stakeholders did not find it an issue to differentiate between the two different formal roles of NOKUT.

Analysis

The review panel finds that NOKUT undertakes a large number of external quality assurance activities each year. NOKUT regularly conducts its audit procedure which runs in 8-year cycles, with NOKUT’s

² <https://www.nokut.no/en/about-nokut/development-strategy-201520202/>

goal being to conduct each cycle within 6 years. Institutional and programme accreditations are conducted on demand, with applications to programme accreditations collected in two rounds annually. While NOKUT also carries out numerous other tasks, QA of higher education remains the main focus area for a large part of NOKUT's management and staff.

The panel was impressed by the fact that the 'Norwegian way' of trust, dialogue and cooperation was mentioned at most meetings. All stakeholders – the Ministry, the students, representatives of HEIs and society – clearly trust NOKUT and consider it to be the main promotor of higher education quality in Norway. The quality, regularity and openness of dialogue with stakeholders were obvious to the panel, and the few issues raised had clearly been previously discussed with NOKUT staff. NOKUT's strategic documents should also be seen in this context of a high level of trust. The Development Strategy and connected documents, as well as public annual reports which are translated to English, are written in plain language and user-friendly, enabling further dialogue with the stakeholders on the content and goals of NOKUT's work. The detailed operational goals are partly set by the Ministry in the annual budget allocation letters and partly defined in NOKUT's internal annual plans, and their implementation is discussed in detail in the annual reports to the Ministry, publicly available in Norwegian³.

While the supervisions and revisions use the same criteria and have the same goals and objectives as the accreditation procedures, NOKUT's supervisory role is specific in that supervisions are not conducted cyclically, but within a risk-based model. This is part of the 'interlinked', supervisory model of quality assurance which differs from standard models of national, cyclical quality assurance. The risk indicators are not pre-defined, but 'risk' is identified on the basis of a large amount of publicly available data on HEIs (partly also collected by NOKUT through activities such as the student survey), NOKUT's procedures and information from stakeholders (including the Ministry). NOKUT is autonomous in deciding when to launch a supervision, and it can also do so as a random exercise.

As mentioned, it was also NOKUT's concern that stakeholders might fail to differentiate between the quality control and quality improvement roles of NOKUT, reiterated at the meetings with the NOKUT staff. Another potentially confusing factor is NOKUT's other roles delegated by the Ministry. However, during the site visit the stakeholders have stated that, as also suggested by the ESG, it is not possible nor desirable to separate quality assurance from quality improvement. The stakeholders are well aware of the difference between NOKUT's activities which are aimed solely at improvement (such as awarding the Educational Quality Prize) or acquiring knowledge – which are both well regarded and appreciated - and those which are part of the 'interlinked' quality assurance model. The latter are done according to the ESG and with formal consequences, and include supervision as a specific method in the international context, but recognized and supported in the national context. There is an understanding that a supervision procedure can represent anything from an information-gathering exercise to full review with an external panel appointed, but with launching of a revision as the only potential formal outcome. NOKUT's work on quality improvement is done regularly at the national level, equally available to all HEIs within its competence, always done in line with the pre-published criteria and procedures, without collecting fees and using external panels whenever it results in any kind of formal decision or report. Thus, the panel holds that this work cannot be considered 'consultancy' in the sense of Annex 5 of EQAR's interpretation of the ESGs.

Finally, the panel is satisfied that NOKUT's international expertise is assured by the participation of foreign experts (primarily Scandinavian, but also those from other European countries) in its Board and peer panels, as well as involvement of NOKUT's staff in ENQA activities and other forms of cooperation with other European agencies.

³ <https://www.nokut.no/en/publications/annual-reports/>

Panel commendations

The panel wishes to commend the way NOKUT has developed its role of a promotor of HE quality through collecting and analysing data on higher education and organising numerous public events and fora for HEIs and other stakeholders it cooperates with.

Panel conclusion: fully compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

As stated in the SAR, NOKUT was established by the Norwegian Parliament when the U&UC Act of 2002 was adopted. Through this law, NOKUT is granted the status of the only authority that officially accredits Norwegian higher education institutions and provision and supervises their educational quality. The U&UC Act contains NOKUT's powers and mandate in section 2-1, and states that "NOKUT is a professionally independent government agency". In addition, section 2-2 of the same act regulates NOKUT's Board, which "has overall responsibility for NOKUT's operational activities and the decisions it makes". The Act sets the general requirements for higher education programmes accredited either by the institutions themselves through their self-accreditation authority or by NOKUT, and the requirement for institutions to periodically undergo an institutional quality assurance audit carried out by NOKUT. Programme accreditation is also a requirement for the issuing of students grants and loans, which means it is of crucial importance for recruitment of students.

The panel has also checked the private institutions' exemption from parts of the regulatory framework stated in the U&UC Act. It learned from NOKUT staff that these relate to their exemption from publishing certain types of information, however these still remain available to NOKUT.

Analysis

The situation regarding this criterion has not changed since the previous ENQA review, where panel found that *NOKUT is a formally recognised professional body, established by the act of Parliament and operating within the law and regulations of the Ministry of Education and Research and therefore has a legitimate status of the only national quality assurance agency for higher and tertiary vocational education in Norway* (p.20). This panel confirms that, as established in the previous review, *the agency is highly respected organisation, appreciated for its commitments to quality evaluation and quality enhancement* (ibid).

NOKUT does not operate outside the Norwegian higher education system.

Panel conclusion: fully 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.

Evidence

Organisational independence of NOKUT is guaranteed by the U&UC Act (Section 2-1(1)) which defines NOKUT as *a professionally independent government agency*. Section 2-2 of the U&UC Act regulates

NOKUT's Board, which *"has overall responsibility for NOKUT's operational activities and the decisions it makes"*. NOKUT's Board appoints NOKUT's Director General. The Act requires members of the Board not to hold leading positions or office at higher education institutions. According to the SAR, the Ministry of Education and Research can only directly influence NOKUT's organisation through regulatory changes, which require extensive public consultations. Changes to the U&UC Act must be adopted by the Parliament. One such change is ongoing regarding the wish of the Ministry to transfer some of its administrative, supervisory tasks to NOKUT. The documents from the public hearing organised by the Ministry, which involved consultations with the HEIs and NOKUT itself, were submitted to the panel. They discuss in detail the legal ability of the Ministry to continue to be responsible for these devolved tasks which would be implemented by NOKUT without endangering its independence, which is discussed with reference to the ESGs.

With regard to operational independence, subsection (4) of the Act allows the Ministry to instruct NOKUT to conduct evaluations in order to assess the quality of higher education. Subsection (6) of the same Act states that *the Ministry may issue regulations relating to requirements for quality assurance systems and quality assurance practices, standards and criteria for the accreditation of institutions and study programmes and rules of procedure for NOKUT's activities. NOKUT may issue detailed regulations on the same topics.* The SAR states that *NOKUT is solely responsible for designing its own methods and procedures, and for making informed decisions about which issue areas, institutions, programmes or disciplines to supervise* (p.37). The Ministry does not pre-define the methodology even of the evaluations it commissions NOKUT to conduct outside of the QA framework (as was the case with the Combined Research and Education Evaluation). The Ministry representatives confirmed that they are in formal and informal dialogue with NOKUT.

Regarding independence of formal outcomes, the SAR notes that *all experts are informed that they act in a personal capacity and not as a representative for their own organisation. The Board is the ultimate arbiter of all decisions related to NOKUT's institutional quality assurance audits, institutional accreditation and revision, revision of programme accreditation on all levels, as well as programme accreditations of doctoral degrees. The Board has delegated its decision-making powers for programme accreditation on bachelor and master levels to NOKUT's administration. NOKUT does not experience pressure from HEI's, nor the Ministry* (p.38).

At the same time, decisions on status of institutions and the programs they deliver are vested by the U&UC Act with the King. It was of interest to the panel if policy considerations enter this decision. The NOKUT staff explained that the decisions are actually made by the Ministry which has no policy on e.g. restricting the number of universities or programmes in certain fields. Both the Ministry and the HEI representatives confirmed that NOKUT is fully independent and that it is not possible to interfere with their decision-making in any way, nor there have been attempts to do so.

Analysis

Already in the previous ENQA review, the panel was satisfied that NOKUT was fully independent, and the overall legal framework remains unchanged in this regard. This panel looked further into the decisions made by the King (in practice, by the Ministry) and questioned if the policy-level concerns could affect these decisions. Particularly in the case of institutional accreditations, which theoretically enable all Norwegian HEIs to become universities after a successful NOKUT accreditation, it was questioned if this would be a wise strategic decision on the national level, regarding funding in particular. The panel was informed that the Ministry always accepted the assessment made by NOKUT, and furthermore that it has no wish to restrict the number of HEIs which become universities as this does not change the funding model used. Equally, there are no strategic documents or plans at the national level to e.g. restrict the provision in certain disciplinary fields.

A further concern raised by the panel during the site visit was that the Ministry was able to instruct NOKUT to perform evaluations. The panel learned that this is an issue of terminology as these are never evaluations with formal decisions in the framework of ESG, but rather various information-gathering exercises and analyses. Supervisions, which sometimes also take the same form, are fully controlled by NOKUT. The Ministry may, although it has never done so in practice, indicate to NOKUT its concerns regarding a programme or an institution, but this would be treated by NOKUT equally as any other information collected in its work (including similar information by students and other stakeholders), and NOKUT would be in no way obliged to launch a supervision only on the basis of this. An example of an evaluation commissioned by the Ministry is the current pilot on Combined Education and Research Evaluations.

While the power of the Ministry to require evaluations thus does not affect NOKUT's independence, it may affect its resources and steer staff away from the regular QA activities. It was stated that this did not happen in practice, as requirements for additional evaluations have until now always been given to NOKUT as projects with separate, additional funding.

In the 2013 review the panel noted that *NOKUT is restrained by the legal and regulatory framework in which it has to operate and currently this affects the extents to which it can prioritise certain aspects of its work. It is, however, clear that the agency has an increasingly influential role in the current review/revision of this framework and enjoys independence in the detail of its operations and, importantly, the decisions made as a consequence of its evaluations* (p. 24). This panel can confirm two improvements in this regard. Firstly, NOKUT now receives lump sum funding (except for the additional tasks funded as projects) which it is able to autonomously distribute as deemed necessary. Secondly, supervision is placed fully within NOKUT's powers, and it is no longer forced to spend resources on multiple program revisions, but can decide autonomously if supervisions are necessary and where.

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

The 2013 panel found NOKUT's system-wide analyses to be an example of good practice. NOKUT has since drafted three meta-reports based on its own QA procedures: an analysis of 87 accreditation reports on the bachelor, master and doctoral levels published in 2012-2017, and an analysis of all the concluding reports from the second cycle of the institutional audits, spanning from 2008 to 2016. These two reports have not been published yet, but drafts were available to the panel in Norwegian with the analysis of audits summarised in English. A third meta-report is the one on master programme accreditations in the 2004-2012 period, published in 2014. NOKUT states in the SAR that they are aware that the low number of published reports is a potential gap in its work. NOKUT explains this with the recent pressure on its resources (discussed in detail under standard 3.5, Resources).

The SAR also states that although the two meta-reports have not been published, they were used by NOKUT when developing the new model of audits and improving the programme accreditation procedure. It follows from the meta-report on the 2nd cycle of audits that NOKUT did organise regular seminars both for experts and HEIs in order to discuss these issues. NOKUT states in the SAR that they plan to publish the drafted reports, and the specific reasons behind the delayed publishing of the two reports were explained to the panel during the site visit. The stakeholders have expressed a wish to

receive reports which would summarise good practices identified in NOKUT's QA procedures and serve as benchmarks when preparing for evaluations. NOKUT management stated that they planned to start regularly publishing short reflections and analyses of NOKUT's work done after each round of audits and accreditations. They believe that organising audits in groups of similar institutions in the 3rd cycle will enable NOKUT to produce regular thematic reports with more relevance to the sector.

NOKUT performs a number of other types of analyses of the HE sector. As noted in the SAR (p. 19), *the Department of Analysis and Development runs several large surveys* (Study Barometer survey of students with results published on a separate website and raw data provided to institutions, and a HEI staff survey), *maintains data portals and conducts analyses to assess various quality dimensions in Norwegian higher education. In addition to the two surveys, NOKUT cooperates with the Database for Statistics in Higher Education (DBH) on the 'NOKUT Portal'*. This is a publicly available portal which lists data on HEIs according to 31 quality indicators, and the data is also used for NOKUT's quality assurance activities. NOKUT also collects additional data from interviews with academic staff, administrators and students, resulting in about a dozen publications per year in 2016 and 2017 (the lists were available to the panel). NOKUT publishes all of these analyses as reports on its website, and arranges public breakfast meetings to launch and disseminate these reports.

In 2016 NOKUT established Section for Evaluation and Quality Enhancement which carries out evaluations and development projects and activities. In addition to the pilot of combined research evaluations, this section is currently responsible for 3 large projects: analysis of educational quality in master programs with the QA agencies of Sweden and Netherlands/Flanders, an advisory group to improve teachers' education, and a pilot on national exams in several disciplines.

Significant analytical work is performed during the process of supervision of different thematic groups of study programmes covering many institutions in the sector. Supervision was not part of the ToR for this review and is not a quality assurance procedure in the sense of the ESG. (It may however lead to starting a revision). Large-scale supervisions can be considered as thematic analyses as far as they look at the way a whole segment of the HE sector meets the quality criteria. Examples include the 2017 supervision of 38 bachelor programmes in child welfare and social work, and 2015 assessment of learning outcomes from 6 academic disciplines.

Analysis

The panel is able to confirm the finding of the previous review on the regularity of system-wide analyses discussing various aspects of Norwegian higher education. The panel is impressed by NOKUT's analytical capacity and the number of analytical reports based on surveys, register data etc. At the same time, the panel has noted that NOKUT has only published one meta-analysis based on the findings of its own quality assurance procedures since the previous review. The panel finds this unsatisfactory – even though NOKUT's other analytical activities to a large extent compensate for this. The low number of published meta-analyses is partly explained by the fact that due to changes in the Norwegian system NOKUT set priority to the development of guides and documents for the new procedures, and partly because NOKUT found that in this period other types of analyses would be more useful to the sector as a whole. As noted above, three meta-analyses based on QA findings have been produced, even though only one was published. The panel is satisfied that two non-published reports were used in further development of the procedures they analysed (programme accreditation and audit). As discussed above, NOKUT is aware of this issue and plans to publish the drafted reports and devote additional resources to regular production of meta-analysis reports in the future.

Panel commendations

The panel finds that NOKUT does exemplary work in collecting information on higher education quality through surveys, interviews and data gathering exercises, and disseminating it to the institutions and

the public through publications, portals and communication with the policy makers and the media. This also includes reflections on NOKUT's work presented in various publications and public presentations.

Panel recommendations

The panel recommends that NOKUT completes and publishes the two meta-analyses of institutional audits and programme accreditations, and implements its plan to publish regular meta-analyses based on NOKUT's own quality assurance work – especially in the next cycle of audits. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3rd cycle of audits.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

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

Evidence

NOKUT's operating budget, awarded by the Ministry on annual bases, remained unchanged in the 2013-2016 period, amounting to about 8 million euro and with annual increases in the additional funding earmarked for specific activities. In 2017 NOKUT successfully managed to make these earmarks part of the regular operating budget as the activities became permanent. Thus NOKUT's operational budget, given as a lump sum, grew to about 14 million euro in 2017, with additional 2 million earmarked for new activities commissioned by the Ministry. This reflects a growing volume of activities, primarily, according to the SAR, in evaluations of foreign qualifications, but also in analytical and quality assurance tasks, as well as in the tasks commissioned by the Ministry.

The number of staff has grown accordingly and, like in 2013, doubled from the previous review – from 73 to 144 members of staff. About 40 people work as caseworkers on NOKUT's quality assurance procedures. They are all trained for the role as discussed under standard 3.6, Internal quality assurance and professional conduct. Since the previous review, NOKUT has moved to new premises which are modern and fully functional, with new offices in the building being refurbished for the staff delegated from the Ministry to perform financial audits at private HEIs. The panel had a tour of the premises during the site visit.

The volume of several activities is outside NOKUT's control: the evaluations commissioned by the Ministry (although this is done in dialogue with NOKUT), the number of programme and institutional accreditations (which are, as noted, temporarily growing in numbers due to institutional mergers), and the number of applications for recognition of foreign qualifications. At the same time, NOKUT was developing the 3rd cycle audit procedure and piloting changes to the programme accreditation. This led to a situation in which NOKUT had to define priorities. The SAR states that it prioritised *the development of more efficient and better accreditation procedures, and the strengthening of supervisory activities*. In the interviews, it was confirmed that the management wished to meet the needs of HEIs that rely on them for accreditations and at the same time the Board asked to focus on audits and to develop NOKUT's supervisory role for the whole sector. NOKUT states in the SAR that this did result in less focus on thematic analyses on the procedures and their results.

Analysis

The panel finds that NOKUT is a well-funded agency, with access to excellent IT support and premises, and regular increases in funding and staff numbers connected to the growing volume of work. NOKUT

recognizes that even in such a favourable situation there is a need to prioritise certain activities, and it has well chosen to give priority to the activities which are not done on the demand of HEIs, but initiated by NOKUT: the improvement of programme accreditation procedures and supervisory activities. As testified by HEIs, this has not had an impact on the activities conducted on demand, as they continue to be conducted within deadlines and the level of NOKUT's support for them remains unchanged. The fact that two meta-reports on programme accreditations and audits were not published, and a perceived pause in audits (2nd cycle completed in 2016 and pilots launched in 2017, with regular audits starting in 2019) were not due to a lack of resources but to specific circumstances and the changes in the legal framework which required prioritisation of other activities. Possible delays were also announced to applicants for accreditation of tertiary vocational programmes.

Panel conclusion: fully 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.

Evidence

NOKUT developed its Internal Quality Steering System already before the 2013 review, which found it to be fully compliant with ENQA's criteria. The System is described in a separate document attached to the SAR and is meant to follow steering principles valid for all of Norwegian public institutions, which also include regular controls and risk assessments. The principles require that steering documents are developed for all activities, with written process descriptions where possible. NOKUT's goals are provided by the legal framework, its Developmental Strategy, Ministry's annual budget allocation letters and NOKUT's annual reports, published and submitted to the Ministry. Within the 'annual wheel of steering', the Ministry oversees NOKUT's performance. NOKUT is internally controlled by the Board and the Director, through monitoring budget allocations and workflow.

NOKUT's HR procedures include annual appraisals of each member of staff. As part of its HR policy, NOKUT has created a Development Plan for Culture and Competence, attached to the SAR. In this plan, NOKUT defines three core values to guide the organisation's activities and the behaviour of individual employees: *Accountable*, *Service-minded* and *Innovative*. These values are then operationalised per departments and sections, and used in staff reviews and recruitment. Feedback from staff is collected annually through performance evaluations, and once every two years through a survey conducted by an external organisation. Many of NOKUT's staff have previous experience working at HEIs, and have a formal induction period. In addition to the formal training on workers' rights and obligations, each new member of staff is awarded a mentor who works closely with them and helps them work in line with NOKUT's culture and written processes. All QA procedures always have 2 caseworkers to improve effectiveness and communication across departments and sections. New members of staff always start as a secondary caseworker on procedures before leading any themselves. NOKUT plans to further enhance collaboration between staff working on recognition of foreign degrees and on quality assurance by combining them in teams to enhance learning and identification of similar issues.

Overall feedback from stakeholders is collected through public hearings conducted when adopting new legislation, 'reference groups' advising the development of new activities, and regular meetings and conferences. Surveys are sent after trainings and workshops, and participation in other NOKUT activities. NOKUT collects feedback on the QA procedures from institutions after site visits and then after the procedure is completed. Expert panel members are also surveyed after completing a procedure. The results of these surveys feed back in the Quality Steering System. As discussed under

standard 3.4, NOKUT has also performed two meta-evaluations of its procedures, which served as a basis for improving them.

The QA procedures are led according to process guides developed for each procedure and publicly available. The stakeholders interviewed by the panel noted that certain details could be better clarified, such as the role of each panel member in writing the report and the timing of sending the satisfaction survey to HEIs. An innovation in the Quality Steering System is the online Quality Handbook with detailed process descriptions, introduced at the end of 2017. The Handbook is meant to be used by NOKUT staff and regularly updated after each round of accreditations, revisions and audits to reflect incremental improvements to routines and methods. It is structured according to keywords and is meant to enable staff to find information on the routines and processes quickly. The online format of the Handbook also enables regular updates. Staff working on programme accreditations have mentioned 'Quality Days' as a basis of updating the Handbook. These are regular (twice a year) one or half-day meetings of all staff working on a round of accreditations, meant to voice lessons learned from that round and incrementally improve the following one.

NOKUT does not subcontract any of its QA activities.

Analysis

NOKUT is a public organisation and its Internal Quality Steering System is meant to assure professionalism of its work and accountability to the public. As was also the finding of the 2013 review, the panel finds NOKUT's Internal Quality Steering System to be well-established and enabling continuous monitoring and improvement of NOKUT's work. During the site visit the panel was impressed by the openness of dialogue with all of NOKUT's staff and stakeholders, and could testify to the culture of dialogue and self-reflection mentioned by the participants. This self-reflectivity is visible also from the SAR which provides a section of 'Reflections' under each ESG standard.

The panel finds that collaborative organisation of NOKUT's work ensures development of staff competences. The system of appointing two caseworkers for each procedure is valuable for training new staff as well as ensuring consistency in implementing the procedures.

The staff are guided in their work by the Quality Handbook. The fact that it is now online should further improve its usability and enable regular updates. The panel trusts that it will be used by NOKUT staff to further clarify details of the procedures which were mentioned by the stakeholders at the site visit as not sufficiently clear.

Panel commendations

The panel wishes to commend NOKUT's efforts to improve collaboration within NOKUT as a learning organization and the introduction of the online Quality Handbook.

The panel also wishes to commend NOKUT on using its frequent events to involve the stakeholders in the discussion of its work as well as of quality in HE in general. This is aided by the public transmissions of some events, for instance the breakfast meetings.

Panel conclusion: fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

NOKUT has been undergoing external reviews every five years since 2008, and this is its third such review. The 2013 review was coordinated by ENQA, and also served as a basis for listing NOKUT in EQAR in 2014.

While the regulations do not explicitly require NOKUT to undergo external evaluations, they do emphasise that NOKUT's work should be done in accordance with international standards and the Ministerial Regulations refer explicitly to the ESG. NOKUT staff have from the very establishment been actively involved in the work of various ENQA bodies and groups, and they actively cooperate with agencies within EHEA, including those outside Scandinavia.

Analysis

The panel was satisfied that NOKUT in practice undergoes external reviews every five years. Although this is not explicitly stated in the regulations, it seems to be taken for granted that because Norway is part of the European Higher Education Area, NOKUT should undergo regular external reviews and be a full member of ENQA and listed in EQAR even though it is solely a national agency which does not conduct reviews outside Norway. The panel found that all the participants at the site visit were aware of the requirements for ENQA membership and acquainted with and supportive of complying with the ESG.

Panel conclusion: fully 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 1 of the ESG.

The 2013 review recommendation was that NOKUT strengthens further its audits in order to fully address the ESG Part 1 by guiding evaluation panels and institutions regarding the kind of processes and procedures they are expected to devise in order to improve the standards of their awards and the quality of learning opportunity for their students.

Evidence

In the 2013 review, the panel found that NOKUT's flexible approach to audits does not necessarily lead to checking each and every standard in the part 1 of the ESG at every institution. Instead, *the panels were primarily focused on the formal organisation of the quality assurance system, its ability to generate information about quality of study programmes and to bring further this information to improve the quality of programmes.* The procedure was not changed until all HEIs had passed through its 2nd cycle, in 2016. In the 2015 follow-up report to the review NOKUT stated that in the future they would expect all HEIs to comply with all the ESG part 1 standards. The Ministerial Regulations were amended between 2015 and 2017 so that they include direct reference to the ESGs, stating that both HEIs' and NOKUT's regulations regarding quality assurance "shall be in accordance with the requirements set out in *Standards and guidelines for quality assurance in the European Higher Education Area*, ESG, as far as they are appropriate." NOKUT's management describes this as the most important change following the 2013 review. This served as a basis to develop new NOKUT's Academic Supervisions Regulations, adopted at the beginning of 2017. According to the meta-report on the 2nd cycle of audits, a crucial change was that NOKUT became able not only to set the evaluation criteria, but also to set them as requirements for HEIs' quality work.

Regarding the programme accreditations, the 2013 panel found that *they had been concerned with direct assessment of the quality of the programme, rather than with the assessment of the effectiveness of the institution's procedures to ensure the quality on a regular and systematic way.* Since 2013, the supervision and revision procedures for both programme and institutional accreditation were changed so that NOKUT is able to first launch supervision in case deficiencies are identified, and revision only if these are not remedied. The supervision and revision procedures use the same criteria as accreditation. The programme accreditation will be changed and piloted by 2019. NOKUT plans to develop a 'light' version for HEIs that already have accredited programmes, and a stricter one for those that do not. They also plan to use wider panels – more than the current 2 experts, and with students and additional stakeholders.

The legal framework is referential so that provisions are not repeated in a bylaw or a regulation, which means that HEIs need to comply with the provisions of the U&UC Act, Ministerial Regulation (which refers to the ESGs) and NOKUT's Academic Supervisions Regulations, and develop their quality in line with these. In audits, this should be checked through the criteria/requirements for HEIs listed in Chapter 4 of NOKUT's Academic Supervisions Regulations which are again listed and explained in NOKUT's audit guides for HEIs and expert panels. The same legal framework lists the accreditation criteria for different types of programmes and institutions which are used in accreditations, supervisions and revisions, and compliance with them is also implied, but not checked directly, in the audit procedure. In the SAR NOKUT summarised reference to ESG part 1 in the table below.

Table 2: Reference of NOKUT's standards to ESG

Consideration of internal quality assurance		External quality assurance activity			
		Institutional quality assurance audit	Programme accreditation, supervision and revision	Institutional accreditation, supervision and revision	Combined Education and Research Evaluations
ESG standard part I	1.1 Policy for QA	NOKUT Reg. §§ 4-1 (1), 4-1 (2), Act § 1-6		NOKUT Reg. § 3-1 (3)*	
	1.2 Design and approval of programmes	NOKUT Reg. § 4-1 (3)	NOKUT Reg. § 2-2 (1-4)	NOKUT Reg. § 3-1 (3)*	COM 3, 8 and 9
	1.3 SCL, teaching and assessment		NOKUT Reg. § 2-2 (5)	Min. Reg. § 3-5 (1)**	COM 4
	1.4 Student admission, progression recognition and certification		NOKUT Reg. § 2-2 (2), Act §§ 3-6 and 3-11	Min. Reg. § 3-5 (1)**	COM 2 and 7
	1.5 Teaching staff		NOKUT Reg. §§ 2-3, 2-4	Min. Reg. § 3-5 (1)**	COM 6 and 10
	1.6 Learning resources and student support	Act § 4-3 (4)	NOKUT Reg. § 2-2 (4), Act § 4-3 (4)	Min. Reg. §§ 3-5 (1)**; 3-5 (3)	COM 1, COM 5
	1.7 Information management	NOKUT Reg. §§ 4-1 (4), 4-1 (5), 4-1 (6), Act § 1-6		NOKUT Reg. § 3-1 (3)*	
	1.8 Public information	Min. Reg. § 2-1 (2)	NOKUT Reg. § 2-1 (2), Min. Reg. § 2-1 (2)		
	1.9 On-going monitoring and periodic review of programmes	Min. Reg. § 2-1 (2)	Min. Reg. § 2-1 (2)	NOKUT Reg. § 3-1 (3)*	
	1.10 Cyclical external quality assurance	Min. Reg. § 2-2		NOKUT Reg. § 3-1 (3)*	

The asterisks for the institutional accreditation procedure refer to the fact that compliance with these ESGs is not checked within the procedure itself, but within audits and programme accreditations which are both preconditions for successful institutional accreditations. Institutional accreditation is an on-demand procedure taking place only when an institution wishes to receive additional rights to self-accredit programmes by changing institutional status.

The panel had access to reports from programme and institutional accreditations as well as revisions and supervisions. In the case of audit, the panel had access to all documents referring to the 2nd cycle of audits as well as changed legal framework, documents and guides for the 3rd cycle. However, the 3rd cycle of audits is in the pilot phase and no reports have been completed by the time of the visit. The panel supplemented this evidence by discussing the procedure with the HEIs, NOKUT staff and experts that participated. From the interviews the panel learned that the ESG Part 1 was a part of the training for everyone involved, and that the expected outcomes show that the procedure in the 3rd cycle of audit is stricter and checks HEIs' systems in a more comprehensive and thorough way than was the case in the 2nd cycle. The institutions confirmed that, while all the processes are challenging, audit in the 3rd cycle brought new terminology and focus on the self-accreditation of programmes. The

reviewers also felt that some of the concepts used, like quality culture, would be further operationalised as the process continues. NOKUT staff also confirmed that the 7 pilot procedures are used to define thresholds.

Combined education and research evaluations are not part of the Norwegian model of quality assurance, but an experimental pilot which may or may not be continued and in which no reports have been produced so far. NOKUT does consider the pilot to be useful as it served to operationalise their quality standards for programmes, and they plan to use its results in further developing their methodologies. The panel also had access to analytical papers produced by NOKUT, including Haakstad (2015) and meta-evaluations of programme accreditations and 2nd audit cycle.

Analysis

The panel can confirm that the ESG part one is satisfactory covered through the totality of QA procedures. As explained above, the Norwegian model rests on strong institutional autonomy. The audits, institutional and programme accreditations check the degree in which institutions comply with the requirements set in the legal framework (including NOKUT's regulations and the policy document on interpreting the programme quality) which refer to the ESG Part 1 as listed in the table above. The model is efficient in that after the initial accreditation the compliance is not re-checked cyclically, but only when deficiencies are identified through NOKUT's continuous supervision which can serve as a basis for revision (e.g. re-accreditation). The model is also efficient because it is 'interlinked', which means that compliance with ESG standards 1.3, 1.4 and 1.5 is checked only when accrediting programmes or providing institutions with self-accrediting powers through institutional accreditations. After passing through these procedures, HEIs are required to check compliance with these standards themselves and they are not re-checked directly within the audit procedure. The audit procedure does however look at a sample of programmes (20% of all programmes, and not less than 3 according to the site visit interviews) as evidence of the effectiveness of the IQA at the reviewed HEIs. Vice versa is also true – ESGs 1.1, 1.7 and 1.10 are not re-checked within accreditations, because they are checked in the audit for all HEIs and it is not possible to accredit programmes without passing an audit. The ESGs 1.2, 1.6 and 1.9 are checked in all of the procedures, and 1.8 is not checked only in institutional accreditation (and connected supervisions and revisions). The data collection exercises, including the student survey and indicators monitored through the NOKUT portal, are not part of the QA framework. However, they obviously contribute to it, also serving as one of the bases for initiating supervisions. NOKUT's procedures should thus be viewed in the context of the overall Norwegian model of monitoring and improving quality of HE, as embedded in NOKUT's work also outside the remit of this review. The panel holds this model to be both efficient and effective overall, as also confirmed by the stakeholders on the site visit.

NOKUT views its audit and supervision procedures as 'full' QA procedures and tends to view its programme and institutional accreditations as 'licensing', meaning they only check if HEIs meet nationally prescribed preconditions and not actual quality. However, after checking a sample of programme reports available in English, the panel is satisfied that programme and institutional accreditations do thoroughly check the ESGs as listed in the table above. Because overall institutional arrangements are checked in the audit procedure, the panel agrees that there is no need to re-check them within the accreditations, and commends NOKUT for focusing explicitly on student-centred learning as expected by the ESG 1.3. The panel also holds that the criterion of 'Educational leadership' added since 2013 review does remedy the concerns in that report regarding the systematic coverage of the ESGs. While the reports on institutional accreditations were only available in Norwegian, the panel did manage to look at them and was again satisfied that the procedure does check the necessary criteria without overburdening the institutions.

When the audit procedure is concerned, the model used in the 2nd cycle was checked already by the 2013 review and assessed as substantially compliant. Since 2013 NOKUT did change the regulations and the procedure, and the evidence from the site visit does indicate that this contributed to a more comprehensive and thorough evaluation of institutional compliance with Part 1 of the ESG. The panel feel confident that the ESG part 1 will be addressed in a more thorough and systematic way in the 3rd cycle. However, because the 3rd cycle of audits is still only in the pilot phase and no complete reports are yet available, the panel cannot fully assess it at this stage, and this should be further checked in the follow-up procedure.

Regarding the combined research and educational evaluations, the panel was again able only to check the criteria, as no completed reports were available. The criteria look at the quality dimensions listed in the policy paper on Programme Quality and checked within programme accreditations, which means that they should also be compliant with the ESG Part 1. Additionally, this may as well be a one-time exercise that may or may not become part of NOKUT's QA framework. The panel thus expects its outcomes to be discussed in the follow-up procedure, and expects NOKUT to pay particular attention to complying with the ESG part 1 if this exercise is to be repeated and included in the overall QA framework.

Panel suggestions for further improvement

The panel suggests NOKUT to pay particular attention that all standards of ESG part 1 are checked within the 3rd cycle of audits and to report on this in the follow-up. It also expects NOKUT to explicitly analyse the way the ESG part 1 is taken into account within future meta-analyses of both programme accreditations and audits.

Panel conclusion: fully 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.

Evidence

The dual aim of NOKUT's procedures – to ensure that the quality of education is in line with NOKUT's criteria and stimulate institutions in continuously improving their education provisions – has not changed since the 2013 review. NOKUT's autonomy did increase through gaining the right to define the audit criteria itself, beyond and above what is required by the U&UC Act and the Ministerial Regulations, which were themselves amended to include direct reference to the ESG. The legal framework gives NOKUT autonomy in defining the methodology of all of its evaluations, and in defining the criteria for its audits and supervisions, while taking into account the legal framework. In checking this criterion, the panel relied on the legal documents as well as detailed explanations of NOKUT's procedures in the SAR. For the assessment of this criteria evidence discussed under 3.1 and 2.1 was also relevant.

It is stated in the SAR that the focus of NOKUT's methodologies has changed with the developing professionalization of the sector, the institutional mergers which lead to growing self-accrediting rights for HEIs and the introduction of new ESGs. From controlling institutions' quality assurance systems, the focus has been moved to ensuring that they continuously improve their programmes. This gave rise to the current 'interlinked' model of quality assurance, organised as follows:

- HEIs that do not have self-accreditation rights for certain levels and fields apply to NOKUT to accredit new programmes;

- HEIs that do have self-accrediting rights are obliged by law to accredit and regularly and cyclically review their programmes in line with the regulations;
- HEIs can gain additional self-accrediting rights through institutional accreditation, in which NOKUT checks if they meet the legal requirements also used for audits and programme accreditation;
- Audits assess the internal quality assurance systems of all HEIs, and check if those that self-accredit programmes do this by following the necessary criteria and procedures. With very small HEIs, there is thus no difference between the audit and the accreditation procedure.
- The supervision procedure serves to avoid burdening the HEIs with frequent programme or institutional re-accreditations. It ensures that NOKUT is able to identify issues through monitoring of the sector, and launch a procedure of revision only if it identifies quality deficiencies through supervision.

Specifically for EQAR's requirement for joint programmes, the panel checked additional criteria for these in the Ministerial and NOKUT Regulations and examined a sample review report, available in English.

The SAR also lists the manner of involving stakeholders in designing its methodologies, which were checked with the stakeholders during the site visit. The adoption of new legal provisions requires a public hearing, and this is according to the SAR the only standardised method of consulting stakeholders. All of NOKUT's regulations and documents are also checked by NOKUT's Board, comprised from stakeholder representatives. According to the SAR, NOKUT also consults its stakeholders through:

- Public consultations, which can include meetings and organisation of conferences (as in the case of adopting the new Academic Supervision Regulations in 2017 or the policy document 'Quality Areas for Study Programmes')
- Work of reference groups, typically when launching new projects and activities (as with the pilot project on combined education and research evaluations)

The stakeholders confirmed that they were able to interact and suggest improvements to NOKUT also through meetings and events it often organises to discuss general quality issues.

NOKUT's methods of self-reflection and improvement are described under criterion 3.6.

Analysis

The panel finds NOKUT's interlinked model to be an example of good practice regarding fitness for purpose because:

- Universities and specialised universities do not have to undergo programme accreditation with NOKUT, but are responsible for their own programmes. The burden of external reviews is thus shifted to the HEI, and they only undergo an audit with NOKUT once in 8 years. Because this is a considerably long period of time, NOKUT does well to try to implement all audits within a cycle within 6 years.
- Due to the institutional mergers and accreditations, the number of HEIs which do not have self-accrediting rights is steadily decreasing.
- NOKUT's powers to launch supervisions are meant to assure that HEIs have an incentive to keep up their quality work even though there are no regular, cyclical checks by NOKUT aside from audits. When launching supervision on basis of data, NOKUT applies the principle that quality may be at risk if indicator values change, but is not at risk if indicator values remain constant. As the supervision procedure was not part of the ToR, the panel could not assess its fitness and in particular not the fitness of the indicator-based risk assessment.

- NOKUT also ensures that quality is kept in focus through its active initiation of public debates, commended by the majority of stakeholders.

The panel is assured that this model was developed with stakeholder involvement by the competent Ministry and NOKUT, as well as through consulting the developments on the international level and the previous ENQA review report.

The criteria for accreditation of joint programs mostly overlap with the ESG, that is, the criteria used in the European Approach for Quality Assurance of Joint Programmes. NOKUT staff are acquainted with the European Approach and have participated in relevant workshops and seminars at the European level. However, NOKUT is not currently able to use it as the legal frameworks require to it to independently check only the parts of joint provision relevant for Norway, and it is not legally able to accept decisions of other agencies in lieu of this. NOKUT staff believe that because the Norwegian minister signed the relevant Ministerial Declaration, this will be changed in the future. Another obstacle to implement the European Approach also at the level of HEIs with self-accrediting rights are legal provisions specific to Norway, such as the requirement that a master thesis is awarded 30 ECTS. Such requirements can only be changed by the Ministry, and it is hoped that it will do so in its efforts to further internationalise Norwegian HE.

Regarding the combined research and educational evaluation, it bears repeating that this is an experiment in assessing the correlations between research and educational quality, where the latter was checked according to the existing NOKUT's indicators and criteria as outlined in the policy document on Programme Quality. It is not part of the interlinked model and its current purpose is only exploratory.

Panel commendations

The panel commends the Norwegian 'interlinked' and risk-based model for enabling oversight of the quality of educational provisions without over-burdening the institutions.

Panel suggestions for further improvement

The panel suggests that NOKUT continues its efforts to conduct a whole audit cycle within 6 years. The legally prescribed 8 years are an overtly long period, which is especially concerning if institutions do not participate in a follow-up procedure during this period (see the standard 2.3 for further details). The panel also suggests that NOKUT further works on studying the possibilities for implementing the European Approach for Quality Assurance of Joint Programmes and advocates the necessary improvements on the policy level.

Panel conclusion: fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

2013 review recommendation was that NOKUT introduces options for follow-up of recommendations in evaluation reports in order to monitor more closely developments in quality assurance systems and study programmes.

Evidence

In the SAR NOKUT provided a detailed description of how each of its procedures met this standard, with guides for institutions for each of the procedures serving as additional evidence for the panel.

Most of NOKUT's procedures start with the equivalent of a self-assessment submitted on a standardised form developed by NOKUT. In the audit the introduction of a standardised form is a novelty introduced in the 3rd cycle. The institution and management for programmes sampled by NOKUT submit authentic documentation that highlights how the institutions' quality assurance activities fulfil the criteria specified in NOKUT's Academic Supervision Regulations. This includes, for instance, institutions' regulations, analyses, evaluation forms, etc. Both the institutional and programme management also submit a self-assessment, which aims to demonstrate how their practices comply with regulations that cannot be documented in any other way. Applications to programme and institutional accreditations also contain commentary on the fulfilment of criteria, as well as supporting documents required by NOKUT, and the same is done in the case of accreditation revisions. In the pilot on combined research and educational evaluations, the HEIs submitted a self-assessment responding to 9 criteria based on NOKUT's policy document Quality Areas for Study Programmes. The only exception is supervision as it does not always necessitate checking of all criteria, but only partial submission of documents may be required instead of a complete self-assessment. Supervision is also an exception when it comes to external assessment, as it is possible for NOKUT to not involve peer panels when supervising purely technical and quantitative requirements. It was explained at the site visit that even e.g. a requirement for information by NOKUT to a HEI can be termed supervision. For all other procedures it is a legal requirement (in the U&UC Act and the Ministerial Regulations) to use external experts. Supervision does not necessarily involve a site visit – NOKUT decides if it is necessary to appoint a panel and if the panel should visit the institutions involved.

Site visit is required for audits, institutional and PhD programme accreditations and revisions of both institutional and programme accreditations. According to information from the site visit, the audit procedure was changed so now there is only one site visit, as opposed to two in the previous cycle. Programme accreditations for bachelor and master programmes do not include a site visit. NOKUT staff said that they were considering introducing it for the institutions they are not well acquainted with through other procedures. The site visits include interviews with staff and, where available, students. The pilot on combined evaluations did not include a site visit, but NOKUT staff has noted that one expert panel did wish to conduct it, and that it would be considered in the future if the exercise is continued. In programme accreditations which do not involve a site visit, as evidenced by the available reports, the panel has an opportunity to ask for clarifications and additional documents before submitting the draft report, and the institutions are able to submit additional explanations and documentation before the report is finalised. In case of negative decisions, all the institutional response and panel's response to it are published together with the report.

All the reports are published on NOKUT's website. The supervision procedure can be completed with a letter to the institution instead of a full report; in this case, the letter is also public.

The audit procedure used to have only two outcomes, positive and negative, as is still the case with accreditations. There are 3 different formal outcomes of an audit for the new, 3rd cycle procedure:

- Fully compliant → no further actions
- Partially compliant → the panel decides on a timespan between 3 and 12 months after which requested changes are checked
- Not compliant → a new audit will take place after 12 months, and in case this audit is also not successful the institution loses its self-accrediting power, in other cases the above apply

If an institution will fail during the pilot phase of the new audit, it will simply take part again in the regular audit cycle.

As noted, lack of follow-up procedures was a major issue in the 2013 review. The 2013 panel expected NOKUT to introduce follow-up procedures for institutional and programme accreditations by 2015. In the 2015 follow-up response, NOKUT informed ENQA of launching a follow-up for the programmes accredited three years earlier. As evidenced by the SAR, the follow-up was a survey in which HEIs had to inform NOKUT about a number of questions, including the way in which they implemented accreditation recommendations. As explained at the site visit and in the SAR, NOKUT decided to discontinue such practice after implementing it for two rounds, as it was deemed burdensome and not useful, and NOKUT is now revising the programme accreditation procedure. It is not yet clear what form of follow-up will be used. The audit procedure is considered to be a follow-up of the institutional accreditation. Each institution is obliged to pass an audit once in 8 years, while NOKUT tries to complete each cycle in a shorter period of 6 years.

The supervision and revision procedures are also considered to be forms of follow-up and they do not have any follow-up procedures themselves, as they are only completed when the institution implements the recommendations, or loses accreditation in the case of revisions. However, supervision and revision are not designed to check the implementation of the audit recommendations. According to the SAR, those institutions that passed the audit successfully in the 2nd cycle of audits will only be followed up in the next 3rd cycle of the cyclical audit. However, the management explained at the site visit that institutions had been invited to discuss implementation of audit recommendations during seminars and conferences for institutions organised by NOKUT. HEI representatives interviewed during the site visit did not feel obliged by NOKUT to “do something” with the recommendations listed in the reports. Likewise, NOKUT holds that, because recommendations do not address the legal requirements but wider issues of quality, the institutions should only take them as advice and are not obliged to follow them.

NOKUT plans to organise regular and more systematic follow-up seminars in the now initiated 3rd cycle of audits – one per each group of institutions, two to three years after each round of audits takes place. NOKUT plans to discuss the implementation of the recommendations only for those recommendations considered still to be relevant as the procedure changes from one cycle to the next.

Analysis

Because the ESGs ask for a self-assessment or equivalent, it is acceptable to the panel that only a minor part of what the institutions and programmes submit is a single self-analytical document, and the majority is evidence, including various analyses regularly conducted by programmes and institutions. As evidenced by the reports checked, these do enable panels to check compliance and provide developmental recommendations.

The panel confirms that all procedures within the ToR include external panels. Supervisions do not always contain a panel, but are also not part of the ToR.

Currently it is not clear if the combined research evaluations will become a standard procedure and what will be its role in the national context; if they continue to be a knowledge-gathering exercise outside the QA model, NOKUT will be able to decide if or not to include a site visit. It is expected that an initial programme accreditation does not include a site visit, as the students are not yet present at the institution and the evidence can be submitted through documents. Site visits can be considered in the future on the request of the panel, possibly also as a part of follow-up.

NOKUT has introduced standardised reporting formats for audits, and the panel is satisfied to find all the reports of all the procedures published at a single place in NOKUT's website, in Norwegian and English where available.

The lack of consistent follow-up procedures was already a concern of the panel in the 2013 review, and this panel finds that the issue has not been solved in a satisfactory manner. In the Norwegian context, NOKUT's role in implementing the QA procedures is primarily seen as a controlling role, where NOKUT checks if institutions and programmes comply with regulations and quality standards, and uses supervisions and revisions as tools to identify those that do not. All procedures also have built-in the follow-up in case of negative decisions, or partial compliance in the new cycle of audits. For audits in which partial compliance is established, institutions receive a one-year period to improve deficiencies. For negative institutional and programme accreditations and revisions, a re-application is possible after a pre-defined period. The developmental role of NOKUT, however, seems to be understood through the numerous analyses it publishes, and its supervisory role rather than a consistent follow-up of recommendations given to institutions and programmes. The panel is concerned that this model does not focus sufficiently on the QA procedures implemented and the recommendations resulting from them.

When it comes to programme accreditations, the decision to discontinue the follow-up survey may be a less important problem, as the current national strategy looks at further reducing the number of programme accreditations as more institutions receive self-accrediting rights.

Because supervisions and revisions are a form of follow-up measures themselves, focused on specific issues with a built-in checking of implementation of recommendations, the panel agrees that they do not need a separate follow-up procedure. The same is true of institutional accreditations, which have the institutional audit as a follow-up mechanism and cannot be awarded without institutions meeting all the necessary requirements. However, it should be taken into account that an audit can come after quite a long period of time – up to 6 or, in theory, even 8 years, and there may be need to check the degree of implementation of the received recommendations sooner than that.

When it comes to audits, the panel finds that there is no consistent follow-up of recommendations from the now finalised 2nd cycle of audits. The implementation of recommendations from a positive audit is currently checked with the institution only in the next audit, and only if these are still relevant for the criteria of the new cycle. This means that the actions taken by the institutions after the audit are not checked comprehensively. While NOKUT holds that supervision and revision can be considered to be a follow-up of audits, the panel finds this not to be the case. Neither of these procedures are designed specifically to check the implementation of the audit recommendations, and they are not implemented automatically nor regularly. Equally, although the possibility for institutions to discuss audit results during seminars and conferences is commendable as a method of providing a forum for sharing information among institutions., these cannot be considered to be a systematic follow-up, and the institutions do not feel obliged to implement the recommendations received. The panel finds NOKUT's plan for follow-up on recommendations in the 3rd cycle of audits with seminars for targeted groups of institutions much more systematic in its approach.

The panel holds that there should be a clear touch base both for programme accreditations and audits aimed at checking the implementation of received recommendations for improvement. Even though recommendations are non-binding for the institutions, they should be given the opportunity to comment on their implementation, or the reasons for not implementing them. NOKUT should thus consider introducing a follow-up in audits and programme accreditations. It could be in the form of a public letter by the institution on if and how the recommendations were implemented or any other method of follow-up. This is especially important in the case of audits as this is the core QA procedure

in the Norwegian system. A consistent follow-up in these two procedures should also help NOKUT in fully complying with the standard 3.4 and producing thematic reports on its procedures which will be of help to institutions. NOKUT's plan for follow-up on recommendations in the 3rd cycle of audits with seminars for targeted groups of institutions is an important step towards this goal.

Panel recommendations

NOKUT should implement the plans for follow-up in the 3rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented. NOKUT should also consider introducing a follow-up procedure for programme accreditations.

Panel conclusion: partially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2013 review recommendation was that NOKUT:

- considers how to make sure that students' contributions add value to the work of experts' panels and they are well supported by an adequate to their needs training;
- defines the non-conflict of interest it applies in its procedures for nomination and appointment of experts, which would help both its experts and the institutions under review to easily detect and prevent cases of conflict of interest.

Evidence

The use of external experts is prescribed by the U&UC Act, and detailed in the Ministerial Regulations. NOKUT's Academic Supervisions Regulations section 5-5 specifies the procedures for the appointments of external experts and their necessary competences. It makes the inclusion of students obligatory in the panels for institutional accreditations and revisions, PhD programme accreditations and revisions of programmes at all levels, and audits. The general principle is that experts need to have an equal or higher academic degree of the one given by the programme they evaluate as well as competence in the discipline of the programme. Experience with institutional leadership is important for institutional accreditations and their revisions, as well as audits. Foreign experts are also required to participate in all panels but those in bachelor programme accreditations. As discussed under standard 2.4., supervisions do not necessarily include expert panels. The combined research and education evaluation included external expert panels, but without student members.

As already established in the 2013 review, student participation is not mandatory in panels for accreditation of bachelor and master programmes. The panel learned on site that there was no pressure from the stakeholders to include students in these panels, also not from the student union. The reason seems to be that these accreditations do not include a site visit, but only a paper-based check of the program plans and resources. NOKUT did pilot the use of students in panels for bachelor and master programme accreditations in 2017. The pilot is assessed as successful both by NOKUT and the students.

Neither staff nor students did report any serious problems with the inclusion of students into the panels in any of the procedures. The staff is aware of some tendencies to keep the students a bit aside in review panels and they feel responsible for working against such tendencies. Students present during the site visit said that they did not see this as an issue.

Students were not involved in the pilot Combined Research and Education Evaluation. The evaluation was done by two panels per area, one for education appointed by NOKUT and one for research appointed by the Research Council of Norway. The panel was not able to establish with certainty the reasons not to include students in the pilot. The reasons mentioned were the fact that this procedure does not involve a site visit that it was only a pilot and that cooperation with the Research Council prevented this. The Student Union also was not eager to send students into the panels as they felt the task would be too specialised and it would be hard for students to participate in those panels. The panel was assured by NOKUT that if the evaluation is repeated, students would be involved. NOKUT also plans to widen the panels with additional experts, possibly also involving society representatives more often, in programme accreditations as well as in Combined Evaluations if they are continued.

From the SAR and the site visit the panel learned that there are several ways to enter NOKUT's reviewers' pool. For institutional and programme accreditations, the institutions themselves are able to suggest experts, but NOKUT is not obliged to appoint them. In these as well as in audit procedures, NOKUT also tries to identify by itself the people with the necessary expertise and experience. The students are typically nominated by the Student Union upon request by NOKUT. The Student Union uses open applications to find suitable students. PhD students are not part of the Student Union and are thus usually nominated upon a recommendation by a professor that already cooperates with NOKUT. In case an expert from the world of work is included in the panel, these experts are found through personal networks. First contact points are usually industry associations and unions.

While NOKUT's experts are obliged by the Administrative Act as well as NOKUT's regulations to avoid conflicts of interest, the 2013 review report required improvement of the way in which this is checked. The panel received an updated form for confirming that an expert is not in a conflict of interest, formatted as a small questionnaire and signed by the expert. The institutions are able to comment on the panel members after they are appointed, and NOKUT can act on any indications on conflicts of interest received in this way. As discussed in the SAR, NOKUT is aware of potential conflicts of interest within a small academic community, and actively tries to solve this by appointing foreign experts or experts from research institutions and from outside academia.

NOKUT's experts in audit procedures participate in a one-day training where they learn about the procedure and their role, and are able to discuss issues. During the site visit, NOKUT staff organised individual training for an expert that was not able to participate on the common one. In programme accreditations which do not involve a site visit, NOKUT organises 'writing meetings' in which experts are first briefed and then work on the draft report. For PhD programme and institutional accreditations, NOKUT organises a similar briefing the goal of which is to prepare for the site visit, check the submitted documentation and ask for additional documentation if necessary. NOKUT also organises seminars for its experts twice a year. These enable them to discuss their experiences, which the experts whom the panel met with described as very useful.

At the site visit the panel met NOKUT's reviewers, including students and an expert from another Scandinavian country, and was able to discuss their selection, experience and training. They confirmed what was stated in the SAR and praised the quality of the materials and the support received by NOKUT. They confirmed that their training included discussion of the ESGs. The student reviewers confirmed that they were equal members of panels. Small misunderstandings were voiced about exact division of work when writing the report. Because NOKUT caseworkers cooperate with the panel from the beginning, NOKUT staff confirms that they participate in writing the reports and can do a large part when it happens that experts fail to do enough. This is not regulated, as in principle the experts should write the reports. Additionally, experts were not sure of how NOKUT's knowledge base is used for concrete evaluations, as the additional data on programmes and institutions collected by NOKUT is not presented to them as a separate source of information.

Analysis

Overall, the panel finds that NOKUT invests efforts to involve and train qualified staff as experts. Conflicts of interests are avoided through a signed statement by each expert, by checks by NOKUT staff, and by allowing institutions to comment on the panels. As in any small academic community, the only way to avoid conflicts of interests is sometimes to hire external experts employed at other types of organisations, or foreign experts. Because most evaluations are conducted in Norwegian, foreign experts primarily come from other Scandinavian countries. Even though most experts come from Scandinavia, international experience is one of the prescribed necessary competences. Further internationalisation of Norwegian HE will probably result in growing English provision and thus enable hiring of a larger number of experts from other countries. If this happens, trainings will need to be adapted to also provide information on the Norwegian higher education system and practices.

The panel found that NOKUT's experts, including students, were satisfied with the training they received and felt that it enabled them to competently perform their role. Regular seminars for experts outside of preparing for specific evaluations were assessed as useful and positive.

The fact that student participation was also piloted for programme accreditations at bachelor and master levels is positive, and the panels believes this will become a standard practice. Even though there were no complaints by either students or other experts, the panel still suggests introducing additional mechanisms to ensure student participation. These can include more detailed guidelines for panel members, or adding student participation as a point in the trainings.

Generally, there is an opportunity to introduce incremental improvements to the training and work of panels by regularly updating the Quality Handbook for NOKUT staff. Especially the writing of reports, in terms of who does it and when, can be better described. At the moment, it is possible that the whole panel participates in writing the report, but also that the report is written by only one panel member, or by a member of the NOKUT staff, with others only commenting.

Panel suggestions for further improvement

The panel suggest that NOKUT further develops its guides for experts using the Quality Handbook and the results of surveys, and especially provides additional guidance on what kind of participation is expected from each member, including student experts, in writing the reports.

Panel conclusion: fully compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

The criteria for NOKUT's QA procedures are defined in the Ministerial Regulations and NOKUT's Academic Supervision Regulation. In the Combined Education and Research Evaluation the criteria are operationalised quality areas from the policy document Quality areas for study programs. All criteria are listed and explained in public NOKUT's guides for institutions and experts, which were available to the panel. According to the SAR, NOKUT also organizes regular seminars for applicants for accreditation of bachelor and master programmes, and holds individual consultations for those applying for PhD or institutional accreditation. Preparation for audits includes meeting with the institutions.

In the 2013 review the panel established that HEIs still lacked clarity on the application of criteria and their chances of passing an evaluation. The legal framework and NOKUT's Academic Supervision Regulation were amended since then. NOKUT also published the policy document "Quality areas for study programs" with its interpretation of academic quality, and updated the guides for institutions and experts. Experts confirmed that the training provided detailed explanations of how to pass the criteria, and that they had the opportunity to discuss those that were less clear. NOKUT updated the training for the audit pilot in order to leave more time for experts to discuss the meaning of the criteria and terms like 'quality culture'. In the audit procedure, large-scale supervisions and the Pilot combined Research and Education Evaluation NOKUT also organizes calibration meetings for heads of all panels where they are able to discuss and align their interpretation of the criteria and thresholds.

Each procedure is led by two NOKUT caseworkers who often come from different sections of NOKUT. They also discuss them in teams at weekly meetings. All reports are checked by Head of Accreditation or the Head of Quality Assurance as drafts before they are sent to institutions and again before they are finalised. Issues can also be discussed at the meetings of the Management Groups or with the Board.

At the site visit, the Board members confirmed that NOKUT staff prepares detailed documentation for each case. The documentation includes precedence and information on previous decisions made in similar cases. Stakeholders consider NOKUT as very fair in the consistent treatment of individual institutions.

Analysis

The panel finds that the criteria for each of NOKUT's procedures are published and clear. The Norwegian system of QA is such that HEIs are given opportunity to improve and inform NOKUT of improvements before any negative formal decisions are made. The procedures are designed in such a way that revision, the only procedure which can result in revoking institutional or programme accreditation, is the very last step and has to be launched as an independent procedure. All other procedures in the case of a negative decision lead only to a loss of opportunity to accredit new programmes for a period of time. As such, the system is fair towards the institutions.

The additional efforts to explain the criteria to institutions and to experts seem to have paid off, as both the HEIs and the experts present at the site visit stated that the criteria were clear. Publishing the meta-analysis will provide additional information to the institutions and experts on how criteria are applied (see standard 3.4. for recommendations). The Board seems to have such information already and feels confident in the consistency of its decision-making.

Panel conclusion: fully compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Evidence

In the 2013 review NOKUT was found fully compliant with this standard. NOKUT publishes full reports on all of its procedures, including those with a negative outcome, online, in Norwegian and, where available, in English. The reports were thus available to the panel.

The reports describe the procedure and the selection and background of the experts. They are structured according to the relevant criteria being assessed and include descriptions of the context, evidence and analyses for the conclusion the experts have reached. Recommendations for follow-up are included in addition to any required action to ensure compliance with regulations. For thematic supervisions, summary reports analyse and compare practices and results from different programmes and/or institutions.

When a report is negative, the institutions can also send additional explanations and comments to the panel during the factual check. The institutional response and any amended panel conclusions are added to the final report. NOKUT is now considering changing the format of these reports so that the additional comments are merged with the original report instead of annexed to it. The reports include the final decision.

The quality and readability of reports is checked by the second caseworker, and NOKUT staff are annually able to attend a 'plain language' course which trains them on how to avoid jargon and make reports more accessible to the public.

At the site visit the stakeholders, including students and society representatives, have confirmed that they read the reports and used them to advocate changes within their institutions. NOKUT staff showed awareness of the potential impact of publishing negative information on HEIs, and stated that they are very careful not to put HEIs reputation at unnecessary risk with the reports. Finally, the stakeholders confirmed that they would benefit from more easily accessible conclusions and good practice examples for e.g. a round of accreditations or audits, similar to those done in supervisions.

Analysis

The panel is able to confirm that all reports are accessible and found at one place on NOKUT website. All reports are published. The reports contain all the elements expected by the standard guidelines and are sent to institutions for factual corrections and additional comments in case of negative decisions. The panel found the reports readable and easy to understand, which was confirmed by stakeholders.

As noted under 3.4, the institutions would benefit from summaries of the bases for positive or negative decisions and good practices. Such information can be presented in reports or online.

Panel commendations

The panel commends NOKUT for the plain language initiative which improves the readability of the reports, and the fact that they are all accessible from a single page on the NOKUT's website.

Panel suggestions for further improvement

Panel suggest that in addition to thematic reports discussed under 3.4 NOKUT considers putting information on the application of the criteria and good practices online in a format easily accessible to institutions preparing for accreditations or audits.

Panel conclusion: fully 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.

Evidence

The 2013 panel found NOKUT fully compliant with this standard. According to the SAR, complaints are not regulated by law, but they are part of a wider practice of collecting feedback, both positive and negative.

The appeals procedure is regulated by the Public Administration Act and the Ministerial Regulations, and is described on NOKUT website. The guides for institutions also contain a description of the appeals procedure. Appeals must be related to a procedural error on NOKUT's part, including the consistent application of criteria. Institutions cannot appeal academic assessments made by the expert panel. The institutions have 3 weeks to submit an appeal. NOKUT staff mentioned examples in which institutions submitted appeals which did not meet the administrative requirements and would consequently be denied. In those cases, NOKUT staff prolonged the deadline and supported the institution in technically improving the appeal so that it is not denied for administrative reasons.

The Ministry of Education and Research nominates the Appeals Committee, which acts independently and externally to NOKUT. The Committee consists of five external members, each with a substitute, and a judge in the Court of Appeals of Norway serves as the chairperson. The Appeals Committee considers each appeal and may either reject or accept it. In the latter case, NOKUT's decision is reversed and sent back to NOKUT's administration for a re-assessment in accordance with the appeals decision. The decision made by the Appeals Committee cannot be appealed.

In the period 2013-2016, institutions appealed against 21 decisions, mostly related to programme accreditation. The majority related to negative accreditation decisions on short programmes. Only one of these achieved the Appeals Committee's consent.

Analysis

The panel finds that the appeals procedure is in line with what is expected from the ESG: the Appeals Committee is appointed by the Ministry and independent of NOKUT and its Board. Legal expertise is assured by including a judge as the chairperson. All formal decisions can be appealed on the basis of procedural inconsistencies which include lack of evidence and inconsistent application of criteria. The panel found evidence that institutions are informed of the right to appeal and have used it.

The complaints procedure is less clearly defined. The culture of dialogue means that institutions are aware of their opportunities to voice complaints and the panel heard of examples when they did so.

Panel suggestions for further improvement

The panel suggests that opportunities for complaints providing feedback to NOKUT are also included in NOKUT's guides to institutions.

Panel conclusion: fully compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1

The panel wishes to commend the way NOKUT has developed its role of a promotor of HE quality through collecting and analysing data on higher education and organising numerous public events and fora for HEIs and other stakeholders it cooperates with.

ESG 3.4

The panel finds that NOKUT does exemplary work in collecting information on higher education quality through surveys, interviews and data gathering exercises, and disseminating it to the institutions and the public through publications, portals and communication with the policy makers and the media. This also includes reflections on NOKUT's work presented in various publications and public presentations.

ESG 2.2

The panel commends the Norwegian 'interlinked' and risk-based model for enabling oversight of the quality of educational provisions without over-burdening the institutions.

ESG 2.6

The panel commends NOKUT for the plain language initiative which improves the readability of the reports, and the fact that they are all accessible from a single page on the NOKUT's website.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 2.1 - Fully compliant

ESG 2.2 – Fully compliant

ESG 2.3 – Partially compliant

Panel recommendation:

NOKUT should implement the plans for follow-up in the 3rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented. NOKUT should also consider introducing a follow-up procedure for programme accreditations.

ESG 2.4 – Fully compliant

ESG 2.5 – Fully compliant

ESG 2.6 – Fully compliant

ESG 2.7 – Fully compliant

ESG 3.1 – Fully compliant

ESG 3.2 – Fully compliant

ESG 3.3 – Fully compliant

ESG 3.4 – Substantially compliant

Panel recommendation:

The panel recommends that NOKUT completes and publishes the two meta-analyses of institutional audits and programme accreditations, and implements its plan to publish regular meta-evaluations of their own work. In addition to the meta-evaluations, it would be of specific interest to HEIs to publish summarised findings of NOKUT's evaluations also as separate reports, and not only as part of wider analytical exercises. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3rd cycle of audits.

ESG 3.5 – Fully compliant

ESG 3.6 – Fully compliant

ESG 3.7 – Fully compliant

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

SUGGESTIONS FOR FURTHER DEVELOPMENT

ESG 2.1

The panel suggests NOKUT to pay particular attention that all standards of ESG part 1 are checked within the 3rd cycle of audits and to report on this in the follow-up. It also expects NOKUT to explicitly analyse the way the ESG part 1 is taken into account within future meta-analyses of both programme accreditations and audits.

ESG 2.2

The panel suggests that NOKUT continues its efforts to conduct a whole audit cycle within 6 years. The legally prescribed 8 years are an overtly long period, which is especially concerning if institutions do not participate in a follow-up procedure during this period (see the standard 2.3 for further details). The panel also suggests that NOKUT further works on studying the possibilities for implementing the European Approach for Quality Assurance of Joint Programmes and advocates the necessary improvements on the policy level.

ESG 2.4

The panel suggest that NOKUT further develops its guides for experts using the Quality Handbook and the results of surveys, and especially provides additional guidance on what kind of participation is expected from each member in writing the reports.

ESG 2.6

Panel suggest that in addition to thematic reports discussed under 3.4 NOKUT considers putting information on the application of the criteria and good practices online in a format easily accessible to institutions preparing for accreditations or audits.

ESG 2.7

The panel suggests that opportunities for complaints and the timing of receiving the surveys are also included in NOKUT's guides to institutions.

Table 3: Overview of conclusions and recommendations

ESG	Level of compliance	Recommendation
2.1 Consideration of internal quality assurance	Fully compliant	
2.2 Designing methodologies fit for purpose	Fully compliant	
2.3 Implementing processes	Partially compliant	NOKUT should implement the plans for follow-up in the 3 rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented. NOKUT should also consider introducing a follow-up procedure for programme accreditations.
2.4 Peer-review experts	Fully compliant	
2.5 Criteria for outcome	Fully compliant	
2.6 Reporting	Fully compliant	
2.7 Complaints and appeals	Fully compliant	
3.1 Activities, policy and processes for quality assurance	Fully compliant	
3.2 Official status	Fully compliant	
3.3 Independence	Fully compliant	
3.4 Thematic analysis	Substantially compliant	The panel recommends that NOKUT completes and publishes the two meta-analyses of institutional audits and programme accreditations, and implements its plan to publish regular meta-evaluations of their own work. In addition to the meta-evaluations, it would be of specific interest to HEIs to publish summarised findings of NOKUT's evaluations also as separate reports, and not only as part of wider analytical exercises. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3 rd cycle of audits.
3.5 Resources	Fully compliant	
3.6 Internal quality assurance and professional conduct	Fully compliant	
3.7 Cyclical external review of agencies	Fully compliant	

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

MONDAY, 05.02.2018.			
SESSION NUMBER	TIMING	TOPIC	PERSONS FOR INTERVIEW
0	14:00 - 16:00	Review panel preparatory meeting	
	16:00 – 18:00	Pre-meeting	Terje Mørland, Director General Øystein Lund, Director of Quality Assurance Gertie De Fraeye, Senior Advisor
TUESDAY, 06.02.2018.			
	TIMING	TOPIC	PERSONS FOR INTERVIEW
	9:00 - 9:15	Arrival of the review panel, tour of the premises	
1	9:15-10.00	Meeting with the Director General and Chair of the Board	Terje Mørland, Director General Øystein Lund, Director of Quality Assurance
	10.00-10.10	Discussion among panel members	
2	10:10-11:10	Meeting with the team responsible for the self-assessment report	Gertie De Fraeye, Senior Advisor Stephan Hamberg, Section Head Evaluation and Quality Enhancement Åsne Kalland Aarstad, Senior Advisor
	11:10-11:20	Discussion among panel members	
3	11:20-12:20	Meeting with the Management Group	Ole-Jacob Skodvin, Director Analysis and Development Helén Sophie Haugen, Section Head Accreditation Hege Brodahl, Section Head Quality Assurance Gard Sandaker-Nielsen, Director of Communications
	12:20-12:35	Discussion among panel members	
4	12:35-13:35	Meeting with (recently reviewed) HEIs (Heads of Quality Management and Heads)	Oddrun Samdal, Vice-rector University of Bergen Nina Waaler, Vice-rector Oslo Metropolitan University Vidar Haanes, Rector Norwegian School of Theology Stine Grønvold, Vice-rector Inland Norway University of Applied Sciences Silje Marie Skeie, Quality Assurance Officer, Norwegian Academy of Music Marit Dahl Haugan, Head of Administration, NSKI University College
	13:35-14:35	Lunch	
5	14:35-15:35	Meeting with the representatives of the Ministry of Education and Research	Mads Gravås, Senior Advisor Erling H. Dietrichson, Senior Advisor
	15:35-15:50	Discussion among panel members	
	As necessary	Wrap-up meeting among panel members and coffee	
WEDNESDAY, 07.02.2018.			
	9.00-9.30	Review panel private meeting	
6	9:30-10:30	Meeting with the Department of Quality Assurance - Section of Quality Assurance (+ someone from the Section of Evaluation and Enhancement)	Rachel Glasser, Senior Advisor Åshild Kise, Senior Advisor Magnus Strand Hauge, Advisor Kjersti Tokstad, Senior Advisor Ingvil Urdal, Advisor
	10:30-10:40	Discussion among panel members	
7	10:40-11:30	Meeting with the Department of Quality Assurance – Section of Accreditation (+Department of Analysis and Development representative(s))	Luna Lee Solheim, Senior Advisor Ingunn Dørve, Senior Advisor Karl Johan Skeidsvoll, Senior Advisor Gro Hanne Aas, Senior Advisor Camilla Oppegård, Senior Advisor
	11:30-11:40	Discussion among panel members	
8	11:40-12:30	Meeting with representatives from the reviewers' pool	Halvor Austenå, Vice-rector University College South-East Norway (Audit) Sigmund Grønmo, Professor Emeritus and former Rector, University of Bergen, (Institutional Accreditation)

			Arne Grønningsæter, Researcher, Fafo Research Foundation (Supervision) Ragnhild Kobro Runde, Associate Professor, University of Oslo (Programme Accreditation) Jørgen Thorslund, former Study Director University College Lillebælt (Programme Accreditation)
	12:30-12:40	Discussion among panel members	
9	12:40-13:30	Meeting with representatives of various stakeholders – employers, unions of HEI staff, etc.	Are Turmo, Skills Director, Confederation of Norwegian Enterprise Hilde Gunn Avløyp, Secretary General, Norwegian Association of Researchers Åshild Olaussen, Head of Policy, Confederation of Unions for Professionals Marianne Aasen, former Member of Parliament and Director, Simula Research Laboratory Bente Ringlund Bunæs, Senior Advisor, Norwegian Association for Higher Education Institutions
	13:30-14:15	Lunch	
10	14:15-15:00	Meeting with student representatives (including student reviewers)	Kine Nossen, Responsible for Policy and Research, Norwegian Union of Students Christine Alveberg, Control Committee, Norwegian Union of Students Madeleine Sjøbrend, Master Student at Norwegian University of Life Sciences (Reviewer Audit) Henrik Finsberg, Ph.d. Student Simula Research Laboratory (Reviewer Ph.d. Accreditation) Bendik Deraas, Master Student at Norwegian University of Science and Technology (Reviewer Master Accreditation)
11	15:00-15:45	Meeting with the Board representatives	Lise Iversen Kulbrandstad, Chair of the Board, Professor, Hedmark University of Applied Sciences Susann Strømsvåg, Board Member, Student, The National Union of Students in Norway Jan I. Haaland, Board Member, Professor, NHH Norwegian School of Economics Jon Erik Svendsen, Board Member, Dean Bachelor, BI - Norwegian School of Management
	15:45-16:00	Discussion among panel members	
	as necessary	Wrap-up meeting among panel members and coffee	
THURSDAY, 08.02.2018.			
	9.00-10.00	Morning meeting among panel members to agree on final lines of enquiry	
12	10:00-11:00	Meeting with Director General/self-assessment group/Management Group to clarify any pending issues	Øystein Lund, Director of Quality Assurance Ole Jakob Skodvin, Director Analysis and Development Helén Sophie Brodahl, Section Head Accreditation Hege Brodahl, Section Head Quality Assurance Stephan Hamberg, Section Head Evaluation and Quality Enhancement Gertie De Fraeye, Senior Advisor
	11:00-12:30	Private meeting among panel members to agree on the main findings	
	12:30-13:15	Lunch	
13	13:15-14:00	Final meeting with Director General, self-assessment and Management Group to inform about preliminary findings	Terje Mørland, Director General Øystein Lund, QA Director Ole Jakob Skodvin, Director Analysis and Development Gertie De Fraeye, Senior Advisor NOKUT's Board and staff

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Norwegian Agency for Quality Assurance in Education (NOKUT) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

October 2017

1. Background and Context

The Norwegian Agency for Quality Assurance in Education (NOKUT) was established in 2003. NOKUT's main tasks and powers are regulated in the Act Relating to Universities and University Colleges, the Act Relating to Tertiary Vocational Education and the associated regulations issued by the Ministry of Education and Research. NOKUT is the official quality assurance agency for Norwegian higher education and tertiary vocational education and the Norwegian ENIC/NARIC-office. NOKUT has an independent board and comprises five departments. NOKUT conducts quality assurance focusing on both quality controls and enhancement. NOKUT also performs a number of analyses to both inform and stimulate the development of quality in educational provision at Norwegian higher education and tertiary vocational education. NOKUT aims to contribute to ensuring society's confidence in Norwegian higher education and tertiary vocational education, as well as recognised foreign higher education.

NOKUT has been a member of ENQA since 2000 and is applying for renewal of membership in ENQA. NOKUT has been registered on EQAR since 2014 and is applying for renewal for registration on EQAR.

2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent NOKUT fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of NOKUT should be reconfirmed/granted and to EQAR to support NOKUT application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of NOKUT within the scope of the ESG

In order for NOKUT to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of NOKUT that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of NOKUT have to be addressed in the external review:

- Institutional quality assurance audit
- Initial institutional accreditation
- Initial programme accreditation
- Revision of institutional accreditation
- Revision of programme accreditation
- Combined Subject-specific Evaluations Interaction between Research and Education (*The activity should thus be considered in the external review of NOKUT, provided it is finalised in time to be analysed by the review panel.*)

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by NOKUT including the preparation of a self-assessment report;
- A site visit by the review panel to NOKUT;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews 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. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide NOKUT with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the NOKUT review.

3.2 Self-assessment by NOKUT, including the preparation of a self-assessment report

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether

within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NOKUT fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the ENQA Guidelines for External Review of Quality Assurance Agencies, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case 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 reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

NOKUT will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to NOKUT at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NOKUT in arriving in Oslo.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to NOKUT within 11 weeks of the site visit for comment on factual accuracy. If NOKUT chooses to provide a 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 NOKUT, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

NOKUT is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which NOKUT expects to contribute to the work and

objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

NOKUT will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. NOKUT commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by NOKUT. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether NOKUT has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to NOKUT and ENQA and until it is approved by the Board the report may not be used or relied upon by NOKUT, the panel and any third party and may not be disclosed without the prior written consent of ENQA. NOKUT may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NOKUT shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, NOKUT will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NOKUT if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	July 2017
Appointment of review panel members	September 2017
Self-assessment completed	Early November 2017
Pre-screening of SAR by ENQA coordinator	November 2017
Preparation of site visit schedule and indicative timetable	November - December 2017
Briefing of review panel members	January 2018
Review panel site visit	February 2018
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	Early April 2018
Draft of evaluation report to NOKUT	Mid-April 2018
Statement of NOKUT to review panel if necessary	Early May 2018
Submission of final report to ENQA	By Mid-May 2018
Consideration of the report by ENQA Board and response to NOKUT	June 2018
Publication of the report	June/July 2018

ANNEX 3: GLOSSARY

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
NOKUT	Nasjonalt organ for kvalitet i utdanningen / Norwegian Agency for Quality Assurance in Education
QA	quality assurance
SAR	self-assessment report
ToR	Terms of Reference
U&UC Act	Universities and University Colleges Act

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NOKUT

Before the site visit:

Guides for HEIs:

- Doc 2.1. Guide Programme accreditation - Bachelor-Master-Ph.d.-Joint degrees
- Doc 2.2. Guide Programme accreditation – Additional guide for new applicants
- Doc 2.3. Guide Institutional accreditation – University College
- Doc 2.4. Guide Institutional accreditation – Specialised University Institution
- Doc 2.5. Guide Institutional accreditation – University
- Doc 2.6. Guide Programme revision – Bachelor
- Doc 2.7. Guide Programme revision – Master
- Doc 2.8. Guide Audit – to higher education institutions
- Doc 2.9. Guide Audit – to experts
- Doc 2.10. Guide for the pilot on Combined Education and Research Evaluations – Education Evaluation (English only)
- Doc 2.11. Guide for the pilot on Combined Education and Research Evaluations – Interplay Evaluation (English only)

Meta-analyses of procedures:

- Doc 3.1. Analysis of the 2nd audit cycle – full version in Norwegian
- Doc 3.2. English summary of the analysis of the 2nd audit cycle – also published on https://www.nokut.no/globalassets/nokut/rapporter/evalueringer/2018/nokuts_evaluation_of_institutions_quality_assurance_systems.pdf
- Doc 3.3. Extensive internal analysis of programme accreditation reports (not yet corrected for factual inaccuracies and therefore not published)

Templates for experts in NOKUT's procedures:

- Doc. 4.1. Template report Programme accreditation – Bachelor and Master (English version)
- Doc. 4.2. Template report Programme accreditation – additional assessment – Bachelor and Master (English version)
- Doc. 4.3. Template report Programme accreditation – Ph.d.
- Doc. 4.4. Template report Institutional accreditation – University College
- Doc. 4.5. Template report Institutional accreditation – University
- Doc. 4.6. Template report Audit
- Doc. 4.7. Template report Revision of programmes

Lists:

- Doc. 5.1. Publications Department Analysis and Development 2016
- Doc. 5.2. Publications Department Analysis and Development 2017
- Doc. 6.1. List of projects/activities for 2016 as reported in the annual report 2016
- Doc. 6.2. List of projects/activities for 2017 as reported in the annual report 2017
- Doc 6.3. Addition: More detailed overview supervision with programmes within child welfare, social work and social education (2016-2017)
- Doc 6.4. Addition: More detailed overview supervision with institutional partnerships (2016-2017)
- Doc 6.5. Addition: Overview of institutions and programmes that participated in the pilot on Combined Education and Research Evaluations (carried out in 2017)
- Doc. 7.1. List of all appeals filed in 2016 and 2017 (for higher education)

During the site visit:

1. Assessment reports of programme accreditations in English:
<https://www.nokut.no/en/publications/accreditation-and-quality-assurance/>
2. Assessment reports of other procedures (Norwegian only):
<https://www.nokut.no/publikasjoner/akkreditering-og-tilsyn--hoyere-utdanning/>
3. Research and analyses in English: <https://www.nokut.no/en/publications/research-and-analyses/>
4. Research and analyses in Norwegian: <https://www.nokut.no/publikasjoner/evaluering-utredning-og-analyse/>
5. Ministerial Regulations, a translation of a 2013 version
6. Academic Supervisions Regulations, translation of a 2013 version (see chapter 6 for the previous audit criteria)
7. Overview of thematic analysis of general findings, methodology and Norwegian higher education, including links to our website
8. Analysis on programme accreditations, 2017, not yet finalized
9. Analysis of the 2nd audit cycle, full version in Norwegian, not published
10. Draft final (overarching) report on the supervision with institutional partnerships, 2018 (sent for approval internally, will be published after approval)
11. Overview of more detailed numbers for appeals since 2013
12. Schematic overview of the supervision procedure, based on the SAR
13. Non-conflict of interest regulations from 2015
14. Declaration of impartiality for experts (since 2015), English version



THIS REPORT presents findings of the ENQA Agency Review of the Norwegian Agency for Quality Assurance in Education (NOKUT), undertaken in 2018.

