

**Rejection of the Application
by Academic Information Centre (AIC)
for Renewal of Inclusion on the Register**

Register Committee
11-12 December 2023

Ref. RC41/A133
Ver. 1.0
Date 2023-12-12
Page 1 / 6

Application of:	2022-08-18		
Agency registered since:	2018-06-01		
Type of review:	Full	Site visit:	2023-02-06
External review report of:	2023-06-28	Submitted:	2023-08-18
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Brian Norton, Ieva Vaiciukevičienė, Michal Goszczynski, Pieter-Jan Van de Velde		
Decision of:	2023-12-12		
Registration until:	2023-06-30		
Absented themselves from decision-making:	Inga Lapina		
Attachments:	1. External Review Report, 2023-06-28 2. AIC's statement on the report, 2023-08-18 3. AIC Additional representation, 2023-11-24		

1. The application of 2022-08-18 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-09-06.
3. The Register Committee considered the external review report of 2023-06-28 on the compliance of AIC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered the applicant's statement on the report, sent on 2023-08-18, and the two change reports of 2021-10-05 and 2022-03-15.
5. The Register Committee invited AIC to make additional representation on the grounds for possible rejection on 2023-10-13. The Register Committee considered AIC's additional representation on 2023-12-12.

Analysis:

6. In considering AIC's compliance with the ESG, the Register Committee took into account

Accreditation of higher education institution

Assessment and accreditation of a study field

Licensing of study programme

Accreditation of study programmes abroad

Inclusion of a licensed study programme on the accreditation form of study field

Register Committee

11-12 December 2023

Ref. RC41/A133

Ver. 1.0

Date 2023-12-12

Page 2 / 6

7. The Register Committee noted that the Assessment of feasibility on changes in study fields (i.e. study programmes)¹ is not an activity within the scope of the ESG and has thus not considered it in its assessment of AIC's compliance with the ESG.

8. The Register Committee found that the report provides sufficient evidence and analysis on AIC's level of compliance with the ESG.

9. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.1 – Consideration of internal quality assurance

10. The Register Committee follows the panel's analysis regarding the requirement of a public quality assurance policy (ESG 1.1), explicitly in the *Inclusion of a licensed study programme on the accreditation form of a study field* and the *Accreditation of foreign study programmes frameworks*. The Register Committee noted that AIC has yet to fully take up the national qualification framework (ESG 1.2) in each assessment framework, focussing more on assessment policies in all assessment frameworks, including a focus on student-centred assessment (ESG 1.3), and adding reference to public information (ESG 1.8) in the *Inclusion of a licensed study programme on the accreditation form of a study field* framework.

11. After consideration of the additional representation by AIC regarding the points addressed in the panel review report and the Register Committee decisions, the Register Committee concluded that even when considering that different procedures could be considered as a package, there are missing elements with regards to standards 1.1, 1.2, 1.3 and 1.8 in the QA model of the agency.

12. Therefore the Register Committee agrees with the argumentation of the panel and judgement of the standard only as partial compliance.

ESG 2.3 – Implementing processes

13. The Register Committee noted that there are inconsistencies in the implementation of the processes. The Register Committee underlines the panel's recommendation that the agency should clearly communicate on the valid reasons behind multiple inputs to its accreditation process and

¹This activity was not designed as a stand alone procedure and therefore does not independently cover all requirements of the ESG Part 2. It only covers the ESG Part 2 in combination with another related procedure licensing of study programme or accreditation of study field.

decisions, by publishing them on the website as noted also in its [Substantive Change Report Decision](#) of 15 October 2021.

14. The Register Committee further noted the concerns raised by the review panel concerning the lack of relevant criteria and information integrated in AIC's guidebook from the Law on Higher Education and Cabinet Regulations, as well as the updating of assessment methodologies, frameworks and the guidelines for institutions, as well as experts.

15. From the additional representation by the agency, the Register Committee understood that, when considering that different procedures would be considered as a package the *Methodology for organising the assessment of higher education institutions and colleges* could be seen as a follow-up procedure for the one-off procedure *Accreditation of higher education institutions*. While the panel noted that the agency is preparing a cyclical institutional accreditation, the Committee reiterates the need for clear follow-up measures.

16. **The Register Committee concluded that AIC complies with ESG 2.3.**

ESG 2.4 – Peer-review experts

17. The Register Committee stressed in its Substantive Change Report Decision of 2021-10-22 that the group of experts in the *inclusion of licenced study programme on the accreditation of study field* procedure, does not include a student. While the Committee understands that this procedure was created as a temporary and short-term solution in order to close possible gaps in the accreditation periods of programmes (until the next re-accreditation of the corresponding study field), the Committee could not follow the agency's decision of not involving students, as per the requirement of the standard 2.4.

18. The Register Committee further noted from the review panel's report that the agency has not resolved this issue and sustained its position that two experts should be sufficient in this procedure.

19. Considering AIC's statement to the report that, the Register Committee understood that AIC is applying the national framework. The Committee however underlined that it is AIC's responsibility to ensure ESG compliance with all standards and that it has taken measures to ensure the involvement of students in all procedures.

20. The Register Committee underlines the panel's recommendation to include student-members in all procedures involving external experts, in particular in the procedures for Inclusion of a licensed study programme in the accreditation form of study field.

21. In its additional representation, AIC explained that the *inclusion of licenced study programme on the accreditation of study field* procedure is not a stand-alone procedure, but a temporary measure while the new quality assurance system from 2025 will include students in all procedures. The Register Committee however noted that students are at the time not included in this procedure, as the new system is not implemented yet. The

Register Committee

11-12 December 2023

Ref. RC41/A133

Ver. 1.0

Date 2023-12-12

Page 3 / 6

Register Committee underlined the expectation of the standard, that students should be involved in all QA processes.

22. The Register Committee concurs with the panel that AIC complies only partially with ESG 2.4.

ESG 2.6 – Reporting

23. The panel’s analysis shows that AIC does publish full reports of the experts panels for its procedures ‘Accreditation of higher education institution’, ‘Assessment and accreditation of a study field’, ‘Licensing of study programme’ and ‘Accreditation of study programmes abroad’.

24. The Register Committee further noted however, that these published reports and the decision letter do not reflect the additional elements which have been provided and taken into consideration after the site visit nor the additional tasks given to the higher education institution.

25. The Register Committee could not find any new supporting evidence to AIC’s position in the additional representation. Both from the panel’s report and the AIC website, it was clear that only the duration of accreditation terms is published, while the full decisions are not published together with the reports.

26. The Register Committee therefore concludes that there is no sufficient transparency in AIC’s reporting processes and therefore concurs with the panel’s conclusion of partial compliance.

ESG 2.7 – Complaints and appeals

27. The Register Committee noted in its past decision that the chairperson of the agency’s board takes the final decision on the appeal and reviews the conclusions of the Appeals Committee. The Register Committee found this may affect the integrity of the appeals process. Additionally, the Register Committee found that higher education institutions do not have the possibility in case of institutional accreditation to appeal the report with AIC (only with ministry).

28. In the Substantive Change Report (of 2022-03-15), AIC elaborated further on the modalities for potential appeals against accreditation decisions regarding the Accreditation of foreign study programmes. The explanations, however, left open how such appeals would be considered.

29. In the review report the panel explained the possibility to appeal accreditation decisions made by the agency. The panel considers that the appeals procedure which has been developed, and the Appeals Committee which has been compiled in January 2022, brought the agency’s review procedures for Latvian higher education institutions in line with the standard.

30. The Register Committee considered the statement of the agency regarding the appeals and complaints procedures and noted that the amendments to the legislation were approved and an appeal procedure,

Register Committee
11-12 December 2023

Ref. RC41/A133
Ver. 1.0
Date 2023-12-12
Page 4 / 6

including independent appeals commission, has been set and is functioning. The Register Committee welcomes the progress made, but follows the panel's concern on the lack of the transparency of external quality assurance system, due to a lack of written procedure for hearing complaints.

31. The Register Committee underscores the panel recommendations on the publication of the procedures to follow-up complaints concerning activities of the agency in Latvia and on the development of an appeals and complaints procedure for its accreditation procedure for foreign degrees.

32. Having considered the improvements by the agency, the Register Committee noted the need to further elaborate on the procedure for complaints. The Register Committee agrees on compliance for this standard.

ESG 3.6 – Internal quality assurance and professional conduct

33. The Register Committee understood from the panel's analysis that AIC has set up an internal management system to support the daily work of the agency and the collection of feedback from different sources to inform improvements.

34. The Committee however noted AIC's internal quality assurance system faces a number of issues and limitations: no major changes/ improvements can take place without government regulation or legal change; the informal nature of the feedback limits the ability of the agency to measure objectively "the outputs of the system"; no sufficient evidence that experts are getting acquainted with additional requirements or obligations set by Study Quality Commission after the accreditation procedure.

35. The Register Committee therefore finds that AIC has yet to consolidate its internal quality assurance system, including internal and external feedback mechanisms for continuous improvement.

36. The Register Committee could not conclude that, as it stands, the agency's internal quality assurance processes are fully sufficient to assure and enhance the quality and integrity of its activities and therefore could not follow the panel's conclusion, but found that AIC complies only partially with the standard 3.6.

37. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

38. Based on the external review report and the considerations above, the Register Committee concluded that AIC demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Previous decision (2018-12-06)	Review panel conclusion	Register Committee conclusion
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2.1	Compliance	Partial compliance	Partial compliance
2.2	Compliance	Compliance	Compliance
2.3	Compliance	Compliance	Compliance
2.4	Compliance	Partial compliance	Partial compliance
2.5	Compliance	Compliance	Compliance
2.6	Compliance	Partial compliance	Partial compliance
2.7	Partial compliance	Partial compliance	Compliance
3.1	Compliance	Compliance	Compliance
3.2	Compliance	Compliance	Compliance
3.3	Compliance	Compliance	Compliance
3.4	Compliance	Compliance	Compliance
3.5	Compliance	Compliance	Compliance
3.6	Compliance	Compliance	Partial compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

Register Committee

11-12 December 2023

Ref. RC41/A133

Ver. 1.0

Date 2023-12-12

Page 6 / 6

39. Also after duly considering AIC's additional representation, the Register Committee concluded that AIC only achieved partial compliance with a number of standards. AIC thus fails to meet some key requirements of the ESG and, in its holistic judgement on the basis of the documentation available and AIC's representation, the Register Committee remained unable to conclude that AIC complies substantially with the ESG as a whole.

40. The Register Committee therefore rejected the application.

41. AIC has the right, according to §3.31 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review.

42. AIC has the right to appeal this decision of the Register Committee in accordance with the [EQAR Appeals Procedure](#). Any appeal must reach EQAR within 40 days from receipt of this decision.



ACADEMIC INFORMATION CENTRE

Academic recognition in Latvia of academic degrees and education documents acquired in other countries
Information institution on recognition of professional qualifications in regulated professions
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Riga, August 18, 2023

No. 2023/4.4-005

To: EQAR Register Committee
e-mail: info@eqar.eu

Subject: external review of the AIC

Academic Information Centre and its Quality Agency for Higher Education (Agency) confirms its intention to apply for registration in EQAR, which is crucial for the international recognition of the agency.

The Agency appreciates the review panel for the in-depth study and feedback on the Agency operation and generally on external quality assurance system in Latvia. However, we would like to emphasize some aspects and kindly ask the EQAR Register Committee to consider them.

1. The first aspect is related to the the impact of the two assessment procedures on the overall judgement of some standards - "Assessment of feasibility on changes in study fields (i.e. study programmes)" and "Inclusion of a licensed study programme on the accreditation form of study field".

When including both procedures in the Terms of Reference for this review, the Agency has added an explanatory note stating that these procedures are not independent (stand-alone) and therefore were deliberately not designed to cover all standards of the ESG Part 2. We would like to point out that both procedures are imposed by the Latvian regulatory framework.

In the opinion of the Agency, the missing elements identified in "Assessment of feasibility on changes in study fields (i.e. study programmes)" and "Inclusion of a licensed study programme on the accreditation form of study field", have served as the main reason for judging standards 2.1. and 2.4. of the ESG Part 2, nevertheless that review panel concluded that all major processes are compliant with standards.

The number of experts and assessing feature are set by national regulation. As it is mentioned in the Self-Assessment Report (SAR) the compliance with the ESG is ensured in conjunction with licensing of study programme or study field assessment, therefore ensuring that student is involved in the assessment of particular subject (SAR p.62-65).

Regarding the assessment of feasibility on changes in study fields (i.e. study programmes) as it is mentioned in the SAR (p.25, 59-60), the cases when changes are reviewed by one expert are set in regulations no.793 paragraph 2.3. Depending on the nature of changes, the expert is provided with individual and specialised training. The set of changes could be different, therefore there is no possible to provide a unified template, however the Agency has developed Methodology (available

<https://www.aika.lv/normativie-akti/ieksejie-normativie-akti/>), where procedure is described, examples are given and guidelines for experts report are provided as well.

Applying the same principles for these two procedures as for the main assessment activities was not deemed to be necessary, considering the nature and legislation, and would only increase the already high level of bureaucracy and workload that the Agency is continuously striving to optimise.

2. As this is the second full review for the Agency, we have made efforts in all areas since the previous review in 2018, including in the areas identified by the previous review panel.

Regarding the standard 2.7., we would like to note that following the review panel recommendation in 2018, the amendments to the legislation were approved and appeal procedure, including independent appeals commission, was set and is functioning (SAR p.15, 71-73). Regarding the accreditation of study programmes abroad the procedure is established, only appeals commission members were not appointed at the moment of the current ENQA review. Detailed information is available in the SAR p.71 – 73 and on the Agency webpage <https://www.aika.lv/en/for-higher-education-institutions/accreditation-of-foreign-study-programmes/>

Taking into account that complaints and appeals procedures are established for all assessment frameworks, recognising the progress made since previous review and current review panel admits that all major review processes are compliant with the standard, the Agency kindly asks to reconsider the assessment of this standard.

Regarding the standard 3.4. the Agency would like to inform that the those thematic analysis report which were not yet published during the review panel visit, currently are available on the Agency webpage: <https://www.aika.lv/normativie-akti/informativie-zinojumi/>

We believe that suggestions provided by review panel will facilitate further improvements. However, in the opinion of Agency, judgments of standards are not proportional to the efforts the Agency has made to maintain an ESG-compliant system in Latvia.

We kindly ask to take into consideration the specific national and legal context in which Agency operates and specifically the role of Agency and its competence and ambitions to facilitate development of quality culture and ensure the spirit of the ESG, which is recognised by all stakeholders.

Yours faithfully,

Jolanta Silka, Head of the Agency

Baiba Ramiņa, Chairperson of the AIC Board





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Riga, November 24, 2023

No. 2023/4.4-012

To: EQAR Register Committee

e-mail: info@eqar.eu

magalie.soenen@eqar.eu

Subject: additional representation of AIC

Academic Information Centre and its Quality Agency for Higher Education (Agency) would like to reconfirm our commitment to the thorough and thoughtful consideration of the ESG in the quality assurance in Latvia.

The Agency is convinced that many of the aspects mentioned by the panel and Register Committee will support further enhancement of Agency's activities. At the same time the Agency would like to pay attention to the proportionality of the assessment, considering that panel concluded that "all major review processes are compliant with the standard" and "the overall interpretation of the ESG standard is correct".

As every set of standards leaves room for interpretation, the Agency would like clarify its position in order to avoid any misunderstandings and assure its respect to the following the ESG and considering "Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies".

Using this opportunity, we would like to provide additional explanation and inform about progress done on some recommendations, which has an impact on the evaluation of some ESG standards.

We would appreciate if Register Committee will consider these aspects while making the final decision.

Additional Representation to the AIC application for the renewal of Registration to EQAR

In the following sections we have provided responses to the findings of the Register Committee and panel, which reflect the existing quality assurance system and our actions on the removal of any concerns regarding the full-fledged implementation of the ESG.

ESG 2.1 – Consideration of internal quality assurance

9. The Register Committee follows the panel's analysis regarding the requirement of a public quality assurance policy (ESG 1.1), explicitly in the Inclusion of a licensed study programme on the

accreditation form of a study field and the Accreditation of foreign study programmes frameworks, taking up the national qualification framework (ESG 1.2) in each assessment framework, focussing more on assessment policies in all assessment frameworks, including a focus on student-centred assessment (ESG 1.3), and adding reference to public information (ESG 1.8) in the Inclusion of a licensed study programme on the accreditation form of a study field framework.

Agency would like to point that ESG 1.1., ESG 1.2., ESG 1.3., and ESG 1.8. are covered by all assessment procedures (detailed mapping in the SAR Table 7 page 45-54):

ESG Part I standards	Licensing of study programmes (Self-assessment report)	Inclusion of a licensed study programme on the accreditation form of study field (Self-assessment report)	Assessment and accreditation of study fields (Self-assessment report)	Institutional accreditation (Self-assessment report)	Accreditation of foreign study programmes abroad (Self-assessment report)
1.1.	Chapter I: 1.2. Chapter III: 3.4., 3.5.	Part II: 2.1.3.	Part I: 1.3., 1.4. Part II: Chapter 2.1. 2.1.6., 2.1.2. Chapter 2.2.	Chapter 1: 1.2. Chapter 2.	Chapter 1.,9.
1.2.	Chapter I: 1.1., 1.2., 1.3. Chapter III.	Part I. Part II: 2.1.1., 2.1.3., 2.1.4.	Part II: Chapter 2.2.: 2.2.2. Part III: Chapter 3.1.: 3.1.2. Chapter 3.2.: 3.2.1., 3.2.3., 3.2.4., 3.2.5	Chapter 1: 1.3., 1.5. Chapter 2: 2.5., 2.6.	Chapter 1., 2.
1.3.	Chapter III: 3.2., 3.3., 3.4., 3.5.	Part II: 2.1.2., 2.1.3., 2.1.4.	Part II: Chapter 2.1.: 2.1.5. Chapter 2.2.: 2.2.3., 2.2.4. Part III: Chapter 3.2.: 3.2.1., 3.2.3.	Chapter 2: 2.6. Chapter 3: 3.4.	Chapter 4., 8., 10.
1.8.	Chapter III: 3.4., 3.5.	Part II: 4.	Part II: Chapter 2.2.: 2.2.5.	Chapter 1: 1.7.	Chapter 7.

However, it is important to add that **the overall quality assurance system was designed to avoid overlaps to the extent possible (that is also suggested by ESG 3.3), therefore the focus on each standard in different procedures slightly differs** and does not require the same element to be repeated. The Agency considers that the current arrangements are optimal for balancing the workload that the higher education institutions face.

On p.49 of the review report the panel follows this idea and even states that: “While the panel values the combination of study field and study programme reviews, it considers that there is still room for improvement in order to reduce the workload by better defining which elements should be assessed at programme level, and which ones are assessed at study field level”.

Also, it is worth to mention “Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies” stating that “Where several activities/processes are complimentary and clearly linked to each other – i.e. in a way that institutions or programmes systematically take part in all of them – they should be treated as a “package” for the purposes of ESG 2.1 and 2.2, which relate to the overall design.”

Agency assures that all standards are covered and there is no argumentation given for the opposite statement.

ESG 2.3 – Implementing processes

12. The Register Committee noted that there are inconsistencies in the implementation of the processes. The Register Committee underlines the panel’s recommendation that the agency should clearly communicate on the valid reasons behind multiple inputs to its accreditation process and decisions, by publishing them on the website as noted also in its Substantive Change Report Decision of 15 October 2021.

13. The Register Committee further noted the concerns raised by the review panel concerning the lack of relevant criteria and information integrated in AIC’s guidebook from the Law on Higher Education and Cabinet Regulations, as well as the updating of assessment methodologies, frameworks and the guidelines for institutions, as well as experts.

The Agency does not follow the argumentation of EQAR in regard to multiple inputs to its accreditation process as the Substantive Change Report Decision of 15 October 2021 does not identify any such issues.

Substantive Change Report Decision of 15 October 2021 emphasized inconsistencies in the naming of accreditation body.

As it is mentioned in the SAR inconsistencies were caused due to the differences in the official translations in English. Agency follows to the official translations and gradually adapt terms in English in the whole documents, by using one term, e.g. Study Quality Commission.

The consistency of all processes is assured by appropriate methodologies and guidelines both for higher education institutions and assessment experts, which are developed for each assessment procedure. Besides, there is an internal quality management system of the Agency which prevents any inconsistency in the implementation.

The Agency ensures that the external quality assurance processes are reliable and consistent through several tools/methods described in the SAR page 59.

The methodological differences of the assessment procedures are related to different aims of the procedures and intention to optimize the workload for the higher education institutions and the Agency, still following all requirements of the ESG 2.3.

The situation when any requirements set by the Law on Higher Education Institutions and Cabinet Regulations are not covered while implementing processes is completely impossible due to the Latvian legal framework (SAR page 58-62).

Agency is authorized by the government to implement quality assurance functions and organize assessment procedures in higher education. These functions are delegated and set out by the respective Laws and Cabinet regulations. Consequently, the decisions of the Agency have to comply with the requirements for formal decisions under the Administrative Procedure Law and respective legislative acts as otherwise they would all end up in the court.

14. The Register Committee noted that “no specific follow-up procedure is in place at institutional level” as the accreditation of higher education institutions, is a one-off procedure. While the panel noted that the agency is preparing a cyclical institutional accreditation, the Committee underlined the lack of clear follow-up measures, for this procedure.

The Agency has developed a policy for performing follow-up procedures and has introduced follow-up procedures for all types of assessments. (SAR page 61)

Although currently the accreditation of higher education institutions is a one-off procedure, it foresees **a follow-up that is described in the Methodology for Organizing the Assessment of Higher Education Institutions and Colleges¹ in Section IV. Follow-Up Activities.** (<https://www.aika.lv/wp-content/uploads/2020/07/Methodology-for-Organising-the-Assessment-of-Higher-Education-Institutions-and-Colleges.pdf>)

At the same time there is a clear vision to change the current quality assurance model to the cyclical institutional accreditation, which will explicitly cover all ESG standards and consequently will include a cyclical follow-up.

As it is mentioned in the SAR (page 20), the work on the transition has taken place since 2019, including a project implemented jointly with the Ministry of Education and Science. Consequently, after the round of workshops and seminars with higher education institutions and other stakeholders the provisional **concept of the new quality assurance model was developed and presented in May 2022. The concept report and presentation are available at:**

<https://www.izm.gov.lv/lv/projekta-progres-a-zinojumi-1>
<https://www.izm.gov.lv/lv/media/16496/download?attachment>

As it is set in ESG 2.3. all assessment processes are defined and published and consistently implemented, following steps described in the guidelines of the standard (SAR page 58-62).

ESG 2.4 – Peer-review experts

16. The Register Committee stressed in its Substantive Change Report Decision of 2021-10-22 that the group of experts in the inclusion of licenced study programme on the accreditation of study field procedure, does not include a student. While the Committee understands that this procedure was created as a temporary and short-term solution in order to close possible gaps in the accreditation periods of programmes (until the next re-accreditation of the corresponding study field), the committee could not follow the agency's decision of not involving students, as per the requirement of the standard 2.4.

19. The Register Committee underlines the panel's recommendation to include student-members in all procedures involving external experts, in particular in the procedures for Inclusion of a licensed study programme in the accreditation form of study field.

In the understanding of the Agency it is of the utmost importance that the assessment procedures are fit for purpose and cover the higher education system as a whole at the same time considering the burden for everyone involved.

The assessment procedures that were initially designed to fully cover all ESG standards involve students as full members of expert groups (Accreditation of higher education institution; Assessment and accreditation of a study field; Licensing of study programme; Accreditation of study programmes abroad).

¹ <https://www.aika.lv/wp-content/uploads/2020/07/Methodology-for-Organising-the-Assessment-of-Higher-Education-Institutions-and-Colleges.pdf>

The role and responsibilities of the student members are equal to those of the other members (including responsibility for the content of the report, remuneration, voting rights etc.) and historically this is an element that the Agency and the Student Union of Latvia has been very proud of.

Review panel concluded that all major review processes mentioned above are compliant with the standard, also in regard to student involvement.

As communicated during the drafting process of the Terms of Reference for the review, the Inclusion of a licensed study programme on the accreditation form of study field is a short-term solution. Within the European Social Fund project higher education institutions received financial support for the development of new study programmes. The newly developed programmes had to receive licence and undergo assessment, therefore it was imposed by legislation.

When designing the procedure for inclusion of a licensed study programme on the accreditation form of study field, the Agency analysed carefully the burden that it would place on the higher education institutions, stakeholders and the Agency, both in terms of human and financial resources. Care was taken to ensure that the relation between the invested resources and the outcome is reasonable and all relevant stakeholders, including the Student Union of Latvia that nominates student experts, were consulted in this regard. These discussions unanimously led to the current setup where the inclusion of a licensed study programme on the accreditation form of study field is as a sequential continuation of the study programme licensing where the progress is assessed, meaning that experts assess whether HEI intentions described during the creation and licensing of the study programme are fulfilled. Taking into account both procedures, it could be concluded that there are 5 experts (2+3) - three academics (one of them is international), one student, one labour market.

Currently there is a transition to the cyclical institutional accreditation. It is already approved that the new quality assurance system will be in place in 2025. In this new system the inclusion of a licensed study programme on the accreditation form of study field will not exist anymore.

<https://www.izm.gov.lv/lv/media/16496/download?attachment>

<https://www.izm.gov.lv/lv/projekta-progres-a-zinojumi-1>

Moreover, the Agency fully respects the requirements of the ESG 2.4 in regard to student participation, therefore it is envisaged that the new quality assurance model will involve students in all procedures.

A support letter from the Student Union of Latvia is attached to this letter to confirm the statements made above.

ESG 2.6 – Reporting

21. The panel's analysis show that AIC does publish full reports of the experts panels for its procedures 'Accreditation of higher education institution', 'Assessment and accreditation of a study field', 'Licensing of study programme' and 'Accreditation of study programmes abroad'.

22. The Register Committee further noted however, that these published reports and the decision letter do not reflect the additional elements which have been provided and taken into consideration after the site visit nor the additional tasks given to the higher education institution.

23. Only the duration of accreditation terms is published, while the full decisions are not published together with the reports.

24. The Register Committee concludes that there is no sufficient transparency in AIC's reporting processes and therefore concurs with the panel's conclusion of partial compliance.

For each assessment procedure the reports of experts and self-assessment reports of higher education institutions are published in a full manner (not summary or abstract as in some cases in the EHEA). In the case of accreditation, the term of accreditation is published as well.

Both public and negative reports are published fully.

All reports are in line with the guidelines (template) developed by the Agency. If any expert disagrees with the opinion of the group as a whole, he/she presents his/her individual opinion in the specific section in the report.

Decision made by the Study Quality Commission is a legal document under the Administrative Procedure Law (as any decision made by the independent institution), therefore decisions include certain legal arguments based on the assessment done by the experts. Decisions may include sensitive or limited access information and are sent to the higher education institution directly.

Decisions are based on the experts report and are in line with the assessment provided by the experts, therefore reporting process is transparent and all the results are publicly available.

ESG 2.7 – Complaints and appeals

25. The Register Committee noted in its past decision that the chairperson of the agency's board takes the final decision on the appeal and reviews the conclusions of the Appeals Committee. The Register Committee found this may affect the integrity of the appeals process. Additionally, the Register Committee found that higher education institutions do not have the possibility in case of institutional accreditation to appeal the report with AIC (only with ministry).

26. In the Substantive Change Report (of 2022-03-15), AIC elaborated further on the modalities for potential appeals against accreditation decisions regarding the Accreditation of foreign study programmes. The explanations, however, left open how such appeals would be considered.

27. In the review report the panel explained the possibility to appeal accreditation decisions made by the agency. The panel considers that the appeals procedure which has been developed, and the Appeals Committee which has been compiled in January 2022, brought the agency's review procedures for Latvian higher education institutions in line with the standard.

28. The Register Committee considered the statement of the agency regarding the appeals and complaints procedures and noted that the amendments to the legislation were approved and an appeal procedure, including independent appeals commission, has been set and is functioning. The Register Committee welcomes the progress made, but follows the panel's concern on the lack of the transparency of external quality assurance system, due to a lack of written procedure for hearing complaints.

29. The Register Committee underscores the panel recommendations on the publication of the procedures to follow-up complaints concerning Latvian activities of the agency and on the development of an appeals and complaints procedure for its accreditation procedure for foreign degrees.

30. The Register Committee therefore concurs with the panel's conclusion of partial compliance.

Complaints procedure is set in the Methodologies for each assessment procedure, prescribing the rights to submit complaints regarding the process of assessment stating that:

- If during the assessment process the assessment experts or HEI detect any violation in the assessment process or unethical conduct of the parties involved in the assessment process, a complaint may be expressed, firstly, to the assessment coordinator, or it could be submitted in written to the Agency:
 - o In case when complaint is expressed directly to the assessment coordinator, assessment coordinator is conducting in line with the set of principles for assessment procedure (if necessary consulting with the Head of the Assessment Unit or Head of the Agency)
 - o If complaint is submitted in written, the complaint is carefully considered and written answer within a month is prepared.
- higher education institution has right to object the approved experts by submitting justified arguments. According to the procedure justification of objection is examined by the Agency, i.e. by assessment coordinator, Head of Quality Assessment Unit and a lawyer and approved by the Head of the Agency. If expert's replacement is not justified, the additional attention is paid to the experts' trainings in order to emphasize the principles of the experts' work. In any case, the Agency provides arguments for replacement or rejection of replacement that are sent to HEI.

In the opinion of the Agency, this level of detail in the methodologies, as the main guiding document for the higher education institutions, is more fit for a purpose than a separate document that would only describe complaints.

In order to ensure better transparency, the above mentioned information is now available not only in methodologies but it is also published at the website, e.g <https://www.aika.lv/en/for-higher-education-institutions/accreditation-of-study-direction/>

According to the Law on Higher Education Institutions and the Cabinet regulations and described in the Methodologies each decision of Study Quality Commission can be appealed, by sending an appeal to the Appeals Commission.

As it is mentioned in the SAR the exception is the accreditation of higher education where a decision-making body is the Higher Education Council whose decisions are appealed to the Ministry of Education and Science.

However, currently there is a transition to cyclical accreditation of higher education institutions. **Amendments to the Law on Higher Education Institutions were already approved on 11.10.2022. with coming into force on 01.01.2025.**

Amendments state that the decision on the accreditation of higher education institutions is taken by the Study Quality Commission within six months. And, as any decision of the Study Quality Commission, it may be contested to the Appeals Commission, and a decision of the Appeals

Commission may be appealed to the court in accordance with the procedures laid down in the Administrative Procedure Law.

The Agency has implemented recommendation on the developing an appeals and complaints procedure for its accreditation procedure for foreign study programmes.

Information is available on the website: <https://www.aika.lv/en/for-higher-education-institutions/accreditation-of-foreign-study-programmes/>

Procedure for appeals and its commission is available here: https://www.aika.lv/wp-content/uploads/2023/11/Rules-of-Procedure_Appeals-Commission_foreign-programmes.pdf

At this moment complaints and appeals procedures are established for all assessment frameworks.

ESG 3.6 – Internal quality assurance and professional conduct

31. The Register Committee understood from the panel’s analysis that AIC has set up an internal management system to support the daily work of the agency and the collection of feedback from different sources to inform improvements.

32. The Committee however noted AIC’s internal quality assurance system faces a number of issues and limitations: no major changes/ improvements can take place without government regulation or legal change; the informal nature of the feedback limits the ability of the agency to measure objectively “the outputs of the system”; no sufficient evidence that experts are getting acquainted with additional requirements or obligations set by Study Quality Commission after the accreditation procedure.

33. The Register Committee therefore finds that AIC has yet to consolidate its internal quality assurance system, including internal and external feedback mechanisms for continuous improvement.

34. The Register Committee could not conclude that, as it stands, the agency’s internal quality assurance processes are fully sufficient to assure and enhance the quality and integrity of its activities and therefore could not follow the panel’s conclusion, but found that AIC complies only partially with the standard 3.6.

The Agency in collaboration with stakeholders has developed a Quality management manual. The Quality management manual aims to document the activities of the Agency in the field of the quality management in order to ensure that all the staff of the Agency and involved stakeholders have common understanding, and the society is informed about quality standards of the Agency.

Information on quality policy is available on the Agency’s website.

The necessity for the improvement of the quality management system is assessed and planned within the annual strategic planning and control process. The Agency assures internal quality at strategic and operational level.

The Quality Management System follows the four steps of the PDCA cycle: Plan – Do – Check – Act (SAR page 40-42)

The SER provides examples of how the provided feedback affects the improvements made in the procedures and operations of the Agency, which confirms the regular feedback mechanisms (SAR Table 5 page 41-42)

As in many EHEA countries, the major changes in the higher education system are introduced through the legislative acts. However, the Agency is always involved in the development of the external regulations related not only to the quality assurance but also to the higher education and research policy in general (for example, ECTS introduction, cycles definition, doctoral concept, education monitoring, higher education state standards etc)

Also, the national legal framework recognizes that all internal regulations developed by the Agency are binding to all involved stakeholders.

The Agency has rights to initiate the amendments as well, for example, there are approved amendments initiated by Agency, for example:

- cabinet regulations in 2018-2019:
 - o the Agency has got more autonomy in drafting methodologies, guidelines and assessment criteria
 - o one joint Study Quality Commission was established for all national procedures instead of two separates for accreditation and for licensing
 - o Appeals commission was introduced
 - o HEI rights to choose any EQAR registered agency for study field assessment
- Law on Higher Education Institutions:
 - o Establishment of the Appeals Commission concept (in 2018)
 - o Cyclical institutional accreditation (in 2022)
 - o Recognition of the accreditation of joint study programmes (in 2022)
 - o Introduction of ECTS (in 2022)

Internal regulations like Methodologies, steps of the procedures, guidelines, by-laws etc are developed by the Agency (in discussions with all stakeholders), as well as amendments are approved also by the Agency without government implications.

As it is described in the SAR the processes for internal quality assurance are prescribed and implemented regularly. The Agency operates in a transparent, responsible and objective manner, involving stakeholders, which could be confirmed by the feedback received from all stakeholders and progress made since the previous assessment, including the current improvements described in this representation.

Yours faithfully,

Jolanta Silka, Head of the Agency

Baiba Ramaņa, Chairperson of the AIC Board

Rīga

16.11.2023. Nr. 2023/PV22

*Letter of support for Academic Information Center
(AIC) and its department Quality Agency for Higher
Education (AIKA).*

The Students Union of Latvia (LSA) represents students in Latvia nationally and internationally. Our organisation is an important partner to higher education policymakers, on topics which impact current and future students of Latvia. Our role is established in the National Law of Higher Education Institutions. LSA is also a member of the European Students Union.

With this letter, we would like to express our unwavering support for AIC and AIKA in the external review process which ENQA coordinates.

It has been brought to our attention that during this external review, the topic of involvement of students in the external quality assurance process has come under scrutiny, especially when it comes to the topic of the assessment of the inclusion of a licensed study programme on the accreditation form of study field. During this legislative process we, and the other stakeholders, concluded that student involvement in the aforementioned visits would be redundant as students are already represented at every other step of the process, most notably we have our representative on the Study Quality Commission where all final decisions on the study directions (including decisions about accreditation, licencing etc.) are taken, a representative in Higher Education Quality Assurance Council, which oversees the system as a whole, LSA is one of the mandated members of the Higher Education Council of Latvia which is the final decision making body on whether or not grant accreditation to new Higher education institutions, LSA also delegates a student representative to every other visit, e.g. programme licensing visits, study field accreditation visits as well as Higher Education institutional accreditation visits. LSA over the years has had great cooperation with AIKA and student representation in quality assurance processes in Latvia is one of the best in the European Higher Education Area.

**DOCUMENT IS SIGNED WITH A SECURE ELECTRONIC SIGNATURE AND
INCLUDES A TIME STAMP**

We hope that you will consider our opinion and that we have managed to address any potential worries about student involvement in the external quality assurance process in Latvia. We are open to further communication on the topic and any other potential concerns that may arise.

President

Liene Levada

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