Approval of the Application by The Danish Accreditation Council (DAC) for Renewal of Inclusion on the Register

Application of:	2025-02-21		
Agency registered since:	2010-07-01		
Type of review:	Targeted	**Site visit:**	2025-12-10
External review report of:	2026-04-22	**Submitted:**	2026-05-18
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Damir Solak, Luna Lee Solheim, Ronny Heintze, Simona Lache		
Decision of:	2026-06-26		
Registration until:	2031-06-30		
Absented themselves from decision-making:	n/a		
Attachments:	1. External Review Report, 2026-04-22		

1. The application of 2025-02-21 adhered to the requirements of the EQAR Procedures for Applications.

2. The Register Committee confirmed eligibility of the application on 2025-03-14.

3. The Register Committee considered the targeted external review report of 2026-04-22 on the compliance of DAC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

Analysis:

4. In considering DAC's compliance with the ESG, the Register Committee took into account the following activities:

- *Institutional Accreditation (IA)*
- *Programme Accreditation (PA)*
- *Institutional Accreditation for Institutions of Arts and Culture*[1]

5. The following activities are not within the scope of the ESG and, thus, not pertinent to the agency's registration on EQAR:

[1]This activity is considered as accreditation of higher education institutions on the agency's entry on EQAR

- *SU Vurderinger*
- *Niveau vurderinger*
- *Assessment of providers of mandatory working environment courses*

6. The Register Committee learned that during the site visit the panel became aware of the new guidelines for *Accreditation of Institutions of Arts and Culture,* introduced in 2025. Hence, the panel included ESG 2.2 as part of the targeted review.

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

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

ESG 2.1 – Consideration of internal quality assurance

9. The Register Committee learned from the review report that the criteria for *Accreditation of Institutions of Arts and Culture* do not fully cover all the elements of ESG 1.6, ESG 1.8 and ESG 1.10. In the panel's view, the elements of these standards are instead covered by requirements in national legislation.

10. The Register Committee considered, however, that an evaluation of standard(s) through national legislation or external bodies cannot legitimately substitute coverage through external QA procedures conducted by the agency itself. **Considering that the agency's criteria for one of its activities do not effectively cover all standards from ESG Part 1, the Committee was unable to concur with the panel's judgement and found the agency partially compliant with the standard.**

ESG 2.7 – Complaints and appeals

11. In its last decision for renewal of registration on EQAR (of 2021-10-15), the agency was found to be partially compliant with the standard as it was not handling any formal complaints and appeals itself.

12. From the review report the Register Committee learned that the agency has developed internal mechanisms for handling complaints and appeals. These mechanisms include guidelines that state how and to whom complaints and appeals should be addressed, as well as the procedure for processing them. The Committee also learned that the agency has created a new body, a Reconsideration Committee, which now handles these appeals.

13. Furthermore, the Register Committee learned that recent legislative changes give higher education institutions two appeal options: they can appeal the Council's decisions on academic matters submitted to DAC, and they can appeal to the Minister for Education and Research on legal grounds regarding whether the Council followed the law. According to the same legislative changes, the Minister can also set rules limiting which decisions can be appealed legally. The Committee understood from the report that granting the Minister the power to set these limitations was a drafting error

in the law that will be corrected. While this error does not affect compliance with the standard, the Committee encourages the ministry and the agency to resolve it soon.

14. **Following the developments implemented by the agency, through the introduction of internal mechanisms, guidelines for handling complaints and appeals and the establishment of a dedicated body dealing with appeals, the Register Committee was able to concur with the panel's conclusion and found that the agency complies with the standard.**

ESG 3.1 – Activities, policy and processes for quality assurance

15. In its last decision for renewal of registration on EQAR (of 2021-10-15), the agency was found to be partially compliant with the standard due to the lack of stakeholder involvement in the governance of the agency.

16. The Register Committee learned from the report that following the legislative changes in 2025, the role of the DAC's Council was expanded. In addition to acting as the agency's decision-making body on matters related to external QA activities, the Council now also acts as the agency's governing body. The body is composed of representatives from higher education institutions, the labour market and students.

17. Considering that the issue raised in the previous decision has been addressed by involving stakeholders in the governance of the agency, the Register Committee concurred with the panel and concluded that the agency is now compliant with the standard.

ESG 3.3 – Independence

18. Following the legislative changes and according to the amended *Act on the Accreditation of Institutions of Higher Education,* the previous structure of the agency has been revised and the secretariat of the agency has been placed under the Ministry of Higher Education and Science as a separate unit, with the former Director of the agency now serving as the Head of Secretariat.

19. In terms of organisational independence, the Register Committee noted the increased influence of the ministry over appointment procedures for key personnel, including the Head of Secretariat, Council chairperson, and members of the Council. The Committee further understood that while five members of the Council are appointed following recommendations from stakeholders' organisations, three are appointed directly by the Minister.

20. The Register Committee learned that the revised legislation contains provisions supporting the agency's organisational independence for the activities under the scope of the ESG. However, as noted by the panel, the Register Committee underlined the concerns raised by stakeholders regarding the safeguarding of the agency's operational independence in circumstances of strong operational dependency on the ministry's resources (see also ESG 3.5).

21. The Committee also learned that the revised legislation now entails that the review panel compositions are determined by the Secretariat of the agency without approval of the Council. Considering that the Secretariat is now placed under the Ministry, the Register Committee found that this further weakens the operational independence of the agency.

22. Based on concerns regarding the organisational and operational dependency of the agency on the Ministry, the Register Committee could not concur with the conclusion of the panel and concluded that DAC is only partially compliant with the standard.

ESG 3.5 – Resources

23. As an outcome of the recent legislative changes, the structure of the agency has changed and the agency has experienced a decrease both of its financial and human resources.

24. The Register Committee learned that the agency staff was reduced from 33 to 15 full time employees. While all of the retained staff are involved in the agency's core activities, administrative, legal, and IT support is to be provided by the staff of the ministry.

25. The Committee learned from the report that it was not entirely clear how these arrangements between DAC and the ministry would work. However, by the end of the site-visit, DAC and the ministry signed a framework agreement outlining how the agency can use and utilise the administrative staff from the ministry.

26. The Register Committee took note of the actions taken by the agency and the ministry, but underlined that how these arrangements work in practice should be analysed during the agency's next review.

27. The Register Committee furthermore noted the agency's four-year financial horizon shows a reduction in budgetary allocations for each subsequent year. While the agency has a separate budget line that can only be used by DAC and not the ministry, the Committee underlined that these reductions could jeopardise the medium- to long-term sustainability of the agency.

28. Considering the agency's lack of capacity to effectively and autonomously manage its own human resources, as well as the risks to its medium- to long-term financial sustainability, the Register Committee could not concur with the panel's judgement and found the agency to be only partially compliant with the standard.

ESG 3.6 – Internal quality assurance and professional conduct

29. In its last decision for renewal of registration on EQAR (of 2021-10-15), the agency was found to be partially compliant with the standard due to the lack of systematic management of its internal feedback mechanisms.

30. The Register Committee learned from the report that the agency has developed a comprehensive framework for its internal quality assurance

processes, including a Procedure Handbook for its secretariat that is updated continuously based on received feedback.

31. Considering these developments in the agency's internal quality assurance procedures, the Register Committee concurred with the panel and concluded that the agency is compliant with the standard.

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

Conclusion:

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

Standard	Previous decision (2021-10-15)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Compliance	Partial compliance
2.2	Compliance	Compliance	Compliance
2.3	Compliance	*Inherited*	*Inherited*
2.4	Compliance	*Inherited*	*Inherited*
2.5	Compliance	*Inherited*	*Inherited*
2.6	Compliance	*Inherited*	*Inherited*
2.7	Partial compliance	Compliance	Compliance
3.1	Partial compliance	Compliance	Compliance
3.2	Compliance	*Inherited*	*Inherited*
3.3	Compliance	Compliance	Partial compliance
3.4	Compliance	*Inherited*	*Inherited*
3.5	Compliance	Compliance	Partial compliance
3.6	Partial compliance	Compliance	Compliance
3.7	**Compliance**	(not expected)	**Compliance** (by virtue of applying)

34. **The Register Committee considered that DAC only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that DAC continues to comply substantially with the ESG as a whole.**

35. **The Register Committee therefore renewed DAC's inclusion on the Register. DAC's renewed inclusion shall be valid until 2031-06-30**[2].

[2] Renewal of registration is valid for five years from the date of expiry of the previous registration, see §4.13 of the EQAR Procedures for Applications.

36. The Register Committee further underlined that DAC is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.