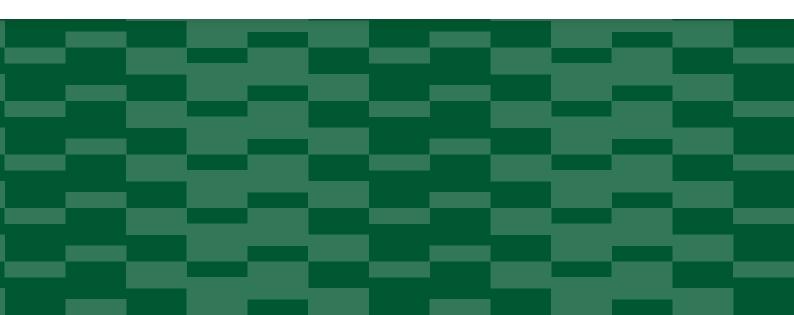


# ENQA AGENCY REVIEW: DANISH ACCREDITATION INSTITUTION (AI)

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## EXECUTIVE SUMMARY

This report analyses the extent to which the Danish Accreditation Institution (AI) complies with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and thus with the membership criteria of the European Association for Quality Assurance in Higher Education (ENQA). The report is based on a review process initiated by ENQA at the request of AI, applying for the renewal of Membership of ENQA.

The assessment process involved a self-assessment by AI and a three-day site visit in Copenhagen, Denmark on 12-14 April 2016.

Al is one of two separate bodies which together form the Danish accreditation system: Whereas Al conducts accreditation procedures of higher education institutions and their programmes, the Accreditation Council as the second body makes the accreditation decisions based on the accreditations that Al performs. A third player in the field is the Advisory Committee to Assess the Range of Higher Study Programmes Offered (RUVU) that is commissioned by the ministry to give a statement on the relevance of new programmes. Only with a positive statement by RUVU higher education institutions can put the programme forward to accreditation.

Al conducts accreditations at programme and at institutional level. Prior to the current system, programme accreditation was the predominant form of external quality assurance in Denmark. Due to the heavy workload the programme accreditation system caused, combined with a relatively high level of positive accreditations, Al prepared for the introduction of institutional accreditations. This was also recommended in the ENQA review of 2010. As from 2013 focus has shifted to put emphasise on the higher education institutions own responsibility for the quality assurance of its programmes and consequently institutional accreditation was introduced. A positive institutional accreditation is valid for six years. Institutions with a positive institutional accreditation do not form part of the cyclical programme accreditations. For those institutions not being accredited, or with a negative result, accreditations on a programme level continues. It is envisaged that by 2019 all higher education institutions will have passed institutional accreditation and hence programme accreditation will cease.

Overall, AI should be described as a well-established quality assurance agency, recognized by all stakeholders. The shift to institutional accreditations has been an important step in putting emphasise on the higher education institutions' own responsibility for the quality assurance of their programmes. This has also led to less workload on institutions, even though AI still struggles with finding the right balance in the amount of documentation required in these accreditations. The emphasis AI put on their vision to support and contribute to the further enhancement of the institutions own quality work is commendable, although the panel sees room for further improvements in order for this approach to reach its full potential. Increased stakeholder engagement will be an important step in this direction.

In the light of the evidence provided by the documentation and the interviews at the site visit, the panel considered that AI's overall performance against the ESG is high. The panel appreciated the high level of commitment by staff and management. The conclusions in short are:

AI complies fully with:

ESG 2.4, 2.5 ESG 3.2, 3.3, 3.4, 3.5, 3.7

Al complies substantially with ESG 2.1, 2.3, 2.6 ESG 3.6

## AI complies partially with:

ESG 2.2, 2.7 ESG 3.1

The panel concluded AI to be fully or substantially compliant on the majority of ESG.

## INTRODUCTION

This report analyses the compliance of the Danish Accreditation Institution (Danmarks Akkrediteringsinstitution) AI, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in January to June 2016.

### **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. Therefore, this review process was initiated by ENQA at the request of AI, applying for the renewal of Membership of ENQA.

As this is Al's second 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.

It has to be noted though that AI has undergone a substantial change of its legal basis and organisational set up since the last review. In 2013 a new law on accreditation came into effect which not only introduced institutional accreditation as new approach but also split up AI into two separate bodies, by transforming the Accreditation Council into a separate legal entity. Although the system as such and also the structure of AI has changed substantially and also meanwhile the ESG have been revised it is worth taking into account the outcomes of the external review of AI conducted in 2010 and in particular the recommendations made.

This review also forms part of Al's application to renew the listing of Al in the European Quality Assurance Register for Higher Education (EQAR).

#### MAIN FINDINGS OF THE 2010 REVIEW

Al had been operating for three years when the ENQA review was conducted in 2010. The panel found that "In the very short period of time the Accreditation Institution managed to set up an accreditation system with sufficient human, financial and expert resources. The panel found the system substantially compliant with the European Standards and Guidelines, however, proposes several recommendations in the light of the further development of the Accreditation Institution."<sup>1</sup>

The following is a summary on Al's level of compliance with the ESG as adopted at the Bergen ministerial conference of the Bologna Process in 2005. The recommendations from the panel can be found under the equivalent ESG 2015, in chapter Findings, page 16-38, of this report. A summary of the recommendations from the 2010 review, as well as the recommendations of this report, can be found in Annex 1: 2010 and 2016 external reviews: a comparative overview of the findings.

<sup>&</sup>lt;sup>1</sup> Report of the External Review of the Accreditation Institution, August 2010. <u>http://www.enqa.eu/index.php/reviews/review-reports-and-decisions/</u>

## AI complied fully with ESG 2005:

- 2.2 Development of external quality assurance processes
- 2.3 Criteria for decisions
- 2.5 Reporting
- 2.6 Follow- up procedures
- 2.7 Periodic reviews
- 3.2 Official status
- 3.3 Activities
- 3.4 Resources
- 3.5 Mission statement
- 3.6 Independence
- 3.8 Accountability procedures

## AI complied substantially with ESG 2005:

- 2.1 Use of internal quality assurance procedures
- 2.4 Processes fit for purpose
- 3.1 Use of external quality assurance procedures for higher education
- 3.7 External quality assurance criteria and processes used by the agencies

### AI complied partially with ESG 2005:

#### 2.8 System wide analyses

#### **REVIEW PROCESS**

The 2016 external review of AI 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 AI was appointed by ENQA and composed of the following members:

- Achim Hopbach (Chair), Managing Director, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria [ENQA nominee]
- Karin Järplid Linde (Secretary), Head of the Department of Quality Assurance, Swedish Higher Education Authority (UKÄ), Sweden [ENQA nominee]
- Jacques Lanarès, Vice-Rector for Quality, Human Resources, and Development of Teaching and Professor in the Faculty of Social & Political Sciences, University of Lausanne (UNIL), Switzerland [EUA nominee]
- José Dias, Master's student of Science in Management, University of Coimbra, Portugal [ESU nominee]
- Marita Aho , Senior adviser, Confederation of Finnish Industries (EK), Finland [representative of employers]

Al produced a self- assessment report which, after completion, provided a substantial portion of the evidence that the panel used to form its conclusions. The panel conducted a site-visit to validate fully the self-assessment and clarify any points at issue. During the visit the panel discussed the AI

compliance with each of the ESG. They reached a high degree of consensus on each criterion separately. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review.

Finally, the review panel produced the present final report on the basis of the self-assessment report, annexed documents, site-visit and its findings. After the site visit, the review secretary prepared an initial outline report in cooperation with chair and panel members. It was submitted to AI for factual comments on its accuracy.

After receiving comments from AI, further revision of the report was agreed between review chair and review secretary, in consultation with the panel. The final report was submitted by the review secretary to the panel, the ENQA Secretariat and to AI.

### Self-assessment report

The panel received a self-assessment report (SAR) of 62 pages, prepared by a project group at AI. Other employees at AI had also been involved in relevant topics.

Al also submitted a 259 pages set of appended documents to the SAR. Beside this the panel was given a list of another six documents used in Al's accreditation processes, available for translation to English upon request from the panel.

The panel found the SAR to be written in a clear language, however the explanations were often short and the panel had to seek for further information in the annexes. In numerous cases the information was not supported by evidence and there were also examples of explanations being misplaced. Before the site visit, the panel asked for some supplementary information such as information about staff, an internal quality assurance policy and the mission statement of AI. Prior to this, the ENQA Secretariat had asked for and received additional information on AI's accreditations on study programmes abroad, it's international engagements, stakeholder feedback and the process of writing the self-assessment report.

#### Site visit

The panel visited the offices of AI in Copenhagen, Denmark on 12-14 April 2016. Before this, the panel held a telephone briefing chaired by the ENQA Secretariat on 7 March 2016 and a preparatory meeting the day before the site visit to further discuss the SAR and the lines of inquiry. A preliminary list with lines of inquiry had been circulated between the panel members before this meeting. The preparatory meeting also included a session with a senior staff member from AI who answered questions from the panel about the context in which AI operates.

Al should be commended for a very well organised site visit. The panel was convinced that the scope and level of the site visit programme (annex 2 of this report) provided relevant information for the review. The panel did however notice that the higher education institutions (HEIs) mainly were represented by quality assurance managers, and not vice chancellors.

Al offered organisational support prior and during the visit. The panel was provided with all necessary information and access to additional documents. Furthermore, Al's support regarding the logistical organisation, transport, accommodation and meals, was of very high quality.

The ENQA Secretariat participated throughout the site visit, including the preparatory meeting, and provided the panel with valuable administrative and organisational support prior and during the site visit.

### THE DANISH HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

#### HIGHER EDUCATION SYSTEM<sup>2</sup>

The responsibility for higher education in Denmark is divided between three ministries. The majority of the HEIs are placed under the auspice of the Ministry of Higher Education and Science. In addition, a smaller number of HEIs are placed under the Danish Ministry of Culture and the Ministry of Defence. There are all in all 38 institutions which fall under the auspice of the Ministry of Higher Education and Science that includes universities (8), university colleges (8), academies of professional higher education (9), artistic education institutions (3) and maritime education institutions (10). These institutions educate approximately 240 000 students. All HEIs are primarily publicly funded.

Higher education programmes in Denmark are divided into research based and professionally oriented programmes. The purpose of the research based programmes is to be at highest international level within the academic disciplines, whereas the professionally oriented programmes should be based on practice to meet the need for well qualified professionals in the private and public sector.

These higher education programmes are offered at three levels: Short-cycle higher education, medium-cycle higher education and long-cycle higher education.

The Ministry of Higher Education and Science is responsible for all three - short-cycle, medium-cycle and long-cycle programmes. The short-cycle and medium-cycle programmes are the academy profession programmes offered at the Academies of Professional Higher Education (Erhvervsakademier) and the professional bachelor programmes offered at the University Colleges (Professionshøjskoler). The long-cycle programmes such as the bachelor, master and PhD programmes are research based university programmes.

The qualification framework for higher education programmes describes the knowledge, skills and competences students must acquire in the three programme groups.

<sup>&</sup>lt;sup>2</sup> Parts of this chapter are taken from:

<sup>-</sup> Al's self-assessment report

<sup>-</sup> Al's web site: <u>http://en.akkr.dk/accreditation-in-denmark/higher-education/</u>

<sup>-</sup> Eurydice – Eurybase Descriptions of National Education Systems and Policies

A short-cycle higher education programme usually take two years. Short-cycle higher education programmes include academy profession programmes that address various professions such as that of dental hygienist, computer scientist, pharmaconomist, commerce manager, laboratory technician and building technician. Short-cycle higher education programmes entitle students to take diploma programmes.

Medium-cycle higher education programmes take between 3-4½ years. These programmes usually address a given profession and include periods of work placement. Medium-cycle higher education programmes cover professional bachelor programmes, for instance. There are more than 30 such programmes in the fields of language, educational theory and practice, technology, social studies and economy. Professional bachelor programmes entitle students to take certain relevant graduate and masters programmes.

Long-cycle higher education programmes include three-year bachelor programmes at universities, graduate programmes and PhD programmes. Bachelor and graduate programmes are highly theoretical and PhD programmes are research programmes.

Long-cycle higher education is concentrated at eight universities: University of Copenhagen, Aarhus University, Technical University of Denmark, University of Southern Denmark, Aalborg University, Roskilde University, Copenhagen Business School and the IT University of Copenhagen.

### QUALITY ASSURANCE

Al was founded in 2007 by law as a public body for external quality assurance of higher education. At that time, Al could be described as an umbrella organisation including both the operational side of accreditations performed by ACE Denmark as well as the decision making body, the Accreditation Council. The setup of Al came as a consequence of the introduction of the Bologna Process in Denmark as well as the Danish government's adoption of a globalisation strategy, with the objectives for Danish higher education programmes to (1) comply with international standards and become world class and to (2) meet society's demand for highly qualified and competitive labour. Hence, programme accreditation was introduced in Denmark and became the operational responsibility of two quality assurance operators: ACE Denmark and the Danish Evaluation Institute (EVA). Prior to this the Danish Centre for Quality Assurance and Evaluation in Higher Education, later EVA, performed systematic evaluations of all higher education programmes. However, the results of the evaluations were not legally binding.

The programme accreditation system in operation from 2007 was criticized for being over bureaucratic and causing too much workload for the HEIs. This, combined with a relatively high level of positive accreditations, led to AI making preparations for an introduction of institutional accreditations. This shift was also recommended by the panel in the ENQA review of 2010. Thus, as from 2013 focus has shifted to put emphasise on the HEIs own responsibility for the quality assurance of its programmes. Institutions with a positive institutional accreditation do not form part of the cyclical programme accreditations but for those institutions not being accredited, or with a negative result, accreditations on a programme level continues. The shift towards institutional accreditations was a consequence of a new Accreditation Act in 2013 which also led to a reorganisation of the two operators ACE Denmark and EVA in 2013, were merged into one under the name of AI. AI got the full responsibility for the accreditation procedures of all types of higher education institutions and programmes, previously performed by ACE Denmark and EVA. However, EVA is still involved in the quality assurance of higher education since they perform studies and cross sectoral evaluations of the whole education sector, from day care centres and schools through upper secondary schools and vocational colleges to universities and adult education<sup>3</sup>. EVA is an affiliate of ENQA and part of INQAAHE and the Nordic cooperation within quality assurance of higher education, NOQA.

As part of the legal reform in 2013 the Accreditation Council, formerly a body of AI, was transformed into an independent unit outside the AI organisation. It consist of nine members, including two student representatives. The chair is appointed by the Minister of Higher Education and the council members as well, but on the basis of recommendations from relevant organisations. At least one of the members must have international accreditation experience. Chair and members are appointed for four years, except for students who are appointed for one year.

The Accreditation Council defines its procedures and methods independently of both political and other institutional interests. The council makes all the decisions based on the accreditation reports prepared by AI and has the possibility to award, conditionally award or to deny accreditation. The council may base its accreditation decision on a report from another internationally recognised agency, but so far this option has never been exercised.

The Accreditation Council holds about five meetings per year. In addition to this they have meetings with stakeholders, such as the Minister of Higher Education, stakeholder organisations and HEIs to discuss different issues of principle.

Also as part of the legal reform in 2013, the Advisory Committee to Assess the Range of Higher Study Programmes Offered (RUVU) was established by the Minister of Higher Education. This is an independent committee which advises the Minister of Higher Education on the relevance of proposed new study programmes. Upon a recommendation from RUVU the Minister of Higher Education decides on whether a new programme is allowed to apply for accreditation at AI. The establishment of RUVU means that the assessment of the relevance of new programmes is removed from the accreditation process.

## **DANISH ACCREDITATION INSTITUTION (AI)**

Al was established by law in 2007 and the subsequent revision of the Accreditation Act in 2013. The Danish Minister for Higher Education and Science has the full responsibility for the Accreditation Act. Further information on the history and establishment of AI is available in previous section, Quality assurance, page 9.

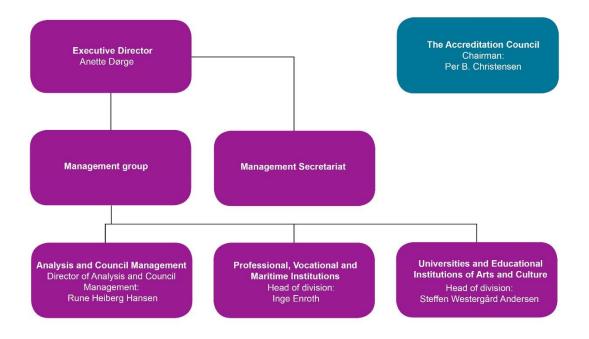
<sup>&</sup>lt;sup>3</sup> <u>http://english.eva.dk/about-eva</u>

#### AI'S ORGANISATION/STRUCTURE

Al is a professionally independent institution within the public administration involved in the accreditation of higher education institutions and their programmes<sup>4</sup>.

The Minister of Higher Education appoints the Director of AI, based on a nomination by the Accreditation Council.

There are four units within AI with separate duties. The **Management secretariat** assists the other units and deals with communication, financial and legal issues. The **Area for Professional, Vocational and Maritime Institutions (PEM)** handles accreditations on both programme and institutional level within the area. The **Area for Universities and Educational Institutions of Arts and Culture (UNIK)** deals with accreditations of programmes and institutions within the area. The Council Secretariat provides the Accreditation Council with service, prepares meetings and is responsible for contacts with the Accreditation Council. Besides of these units there is a Management group consisting of the Executive Director and the heads of the units.



## The Danish Accreditation Institution

#### Al's functions, activities, procedures

The role of AI is to ensure and document the quality and relevance of higher education programmes<sup>5</sup>. This is done by performing accreditations according to the following:

• Accreditation of all higher education institutions in Denmark

<sup>&</sup>lt;sup>4</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, §2

<sup>&</sup>lt;sup>5</sup> Al's self-assessment report, p.14

- Accreditation of new and existing bachelor, master's (candidatus) and master programmes at universities
- Accreditation of new and existing professional bachelor and academy profession programmes as well as further adult education and diploma programmes
- Accreditation of new and existing bachelor, master's (candidatus) and master programmes under the Ministry of Culture, including the bachelor, master's (candidatus) and master (postgraduate education) programmes in the Arts

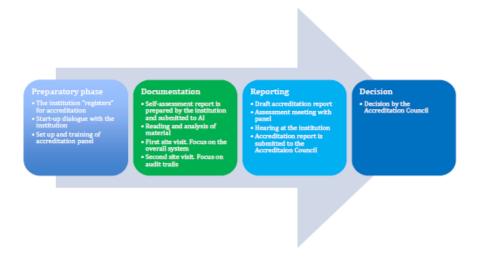
These accreditations cover all types of higher education institutions and study programmes in Denmark. However, there has been a political decision that PhD programmes are not subject to accreditation.

In 2015 AI performed 69 accreditations of existing programmes, 10 accreditations of new programmes and 3 institutional accreditations. This is to compare with 2012 where 188 accreditations of existing programmes where conducted and 87 accreditations of new programmes. Since the introduction of institutional accreditations in 2013, AI has decided on 9 institutional accreditations.

Al accreditations covers only higher education institutions with their home location in Denmark. If an institution plans to offer a study programme abroad, they can choose whether to be quality assured by AI or another quality assurance agency. If accredited by AI, the accreditation procedures follow the same routines as for programmes offered in Denmark, but with special attention to the Danish HEIs' responsibility and assurance of the quality of the study programme abroad. In 2012 – 2016, 6 new study programmes offered by Danish HEIs abroad, were accredited.<sup>6</sup>

Accreditation process in institutional accreditations<sup>7</sup>:

Case history, institutional accreditation

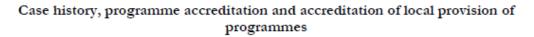


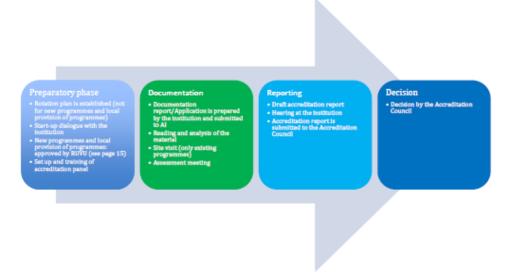
<sup>&</sup>lt;sup>6</sup> Supplementary Information requested by the ENQA secretariat, 9 February 2016

<sup>&</sup>lt;sup>7</sup> Procedure handbook, August 2015 (revised in January 2016)

An institutional accreditation is initiated by the institution itself, applying for accreditation. Institutions with a positive institutional accreditation are entitled to establish new study programmes and new offerings of study programmes after these have been prequalified and approved<sup>8</sup>, and to make adjustments to existing study programmes. The establishment of new study programmes and new offerings of study programmes, and adjustments to existing study programmes, must take place in accordance with the educational institution's quality assurance policy and strategy. There is a requirement for all institutions to use external expert panels in the reviews of existing programmes. A positive institution accreditation is valid for a maximum of six years.<sup>9</sup>

Accreditation process in programme accreditations<sup>10</sup>:





New study programmes and new offerings of study programmes must be pre-qualified by the Minister for Science, Innovation and Higher Education prior to their establishment. Pre-qualification is an assessment of the relevance of the new study programme or the new offering of a study programme in socio-economic and education-policy terms, and of whether it generally fulfils the applicable statutory requirements. The assessment of the relevance is done by RUVU on request of the ministry.

A positive accreditation of a programme makes it possible for the educational institution to offer the programme in question. The accreditation of the programme is valid for six years, after which the study programme or offering of study programme must be reaccredited, unless the educational institution in the meantime has achieved positive or conditional positive institution accreditation.<sup>11</sup> The reaccreditations of programmes is done according to a yearly set rotation plan. The plan is

<sup>&</sup>lt;sup>8</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, Part 4

<sup>&</sup>lt;sup>9</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, Part 3

<sup>&</sup>lt;sup>10</sup> Procedure handbook, August 2015 (revised in January 2016)

<sup>&</sup>lt;sup>11</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, Part 3

established by the Accreditation Council and available for institutions to comment on before being final<sup>12</sup>.

According to the Accreditation Act, AI must comply with international standards and also to disseminate relevant national and international experience of relevance to accreditation. This is done through published thematic analysis. AI has strengthened its international activities by participating in and contributing to a wide range of international knowledge sharing activities and international conferences during the last 2-3 years. AI is also part of different international networks such as ENQA, INQAAHE, ECA, QAN and NOQA. AI is also listed on EQAR.

## AI'S FUNDING

Al is funded by the Danish government according to the Financial Act. Total number of staff for 2015 was 42 FTE. For 2015 funds of 36.2 million DKK where distributed as follows:

| Main operation (as stated in the finance law) | Share of<br>funding | Other income | Cost | Share of financial result |
|---|---------------------|--------------|------|---------------------------|
| Management and administration                 | -6,0                |              | 5,6  | -0,4                      |
| Institutional accreditation                   | -14,3               |              | 13,3 | -1,0                      |
| Accreditation of new study programmes         | -2,3                | -0,1         | 2,6  | 0,2                       |
| Accreditation of existing study programmes    | -7,1                |              | 6,6  | -0,5                      |
| Council management                            | -2,9                |              | 2,7  | -0,2                      |
| Documentation                                 | -3,6                |              | 3,3  | -0,3                      |
| Total   | -36,2               | -0,1         | 34,1 | -2,2                      |

Table 1: Distribution of funds during 2015 (million DKK)

<sup>&</sup>lt;sup>12</sup> Procedure handbook, p. 14-15, August 2015 (revised in January 2016)

## FINDINGS: COMPLIANCE OF THE DANISH ACCREDITATION INSTITUTION 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.

Previous review 2010. ESG 3.1, Standard fulfilment: Substantially compliant
Previous review 2010. ESG 3.3 (Activities), Standard fulfilment: Fully compliant
Previous review 2010. ESG 3.5 (Mission statement), Standard fulfilment: Fully compliant
Recommendations 2010: None

NB: In the following chapters the panel also refers to the outcomes of the 2010 review of AI and in particular the assessments and recommendations given by the panel although certain ESG have changed content wise or aspects have been moved to another standards of ESG.

#### Evidence

The agency undertakes institutional and programme accreditations on a regular basis as described in the introduction to this report, page 9 section Danish accreditation institution (AI) and also in section ESG Part 2: External quality assurance, from page 26 and onwards. Higher education institutions should be accredited every six years and there is a rotation plan for programme reviews set up on a yearly basis. In addition to the accreditations, AI also performs and publishes thematic analyses.<sup>13</sup> These are further described and commented by the panel in section ESG 3.4, Thematic analysis.

The function and the activities of the agency are defined in the Danish Accreditation Act. The agency has a publicly available mission statement published on their web site<sup>14</sup>. The value of the organisation reads as follows:

Al's raison d'etre is a higher purpose: The organisation works on ensuring quality and relevance at all higher education institutions. Al's purpose is therefore to improve the quality of programmes in the higher education sector and to help create a more coherent and transparent education market for the benefit of students, the labour market and educational institutions. In short: Al's core activities have great social significance and are used to improve the quality of higher education programmes and to qualify political decisions.

<sup>&</sup>lt;sup>13</sup> <u>http://akkr.dk/publikationer/</u>

<sup>14</sup> http://akkr.dk/om/

On the basis of this value, AI sets targets for the organisation. According to the mission statement, the agency supports the institutions own quality assurance work and development activities. AI sees the accreditations as a method "to improve pivotal parts of institutions work on quality".

According to ESG, there should be an interaction between the agency and relevant stakeholders in higher education, especially the higher education institutions.

Al gives evidence of activities with stakeholders, especially those related to the introduction of the new institutional accreditations. These activities relates to both meetings and written opportunities, so called hearings, to give input on Al upcoming reviews. The activities were especially addressed to the HEIs, but some involved other stakeholders as well such as students and labour market representatives.<sup>15</sup>

For student interactions a Students Accreditation Council (STAR) has been set up, where 19 national student organisations are represented. One of the purposes with STAR was to raise awareness and interest in quality assurance, among students in general but also among those participating at site visit interviews. Meetings in STAR are about twice a year.

In the preparation of the thematic analyses AI holds annual meetings with stakeholders about upcoming themes. These meetings are held with both HEIs, students and labour market representatives.

The AI has no board or any kind of advisory committee and therefore no stakeholders are involved in the governance of AI. It should however be mentioned that members of the Accreditation Council, which is responsible for all the accreditation decisions on higher education institutions in Denmark and their study programmes, are suggested by student bodies and HEIs.

## Analysis

The panel believes the regularity of the accreditation activities to be clear and transparent. This was also confirmed by the stakeholders at the site visit.

The panel believes that the mission statement is clear and relevant to the AI organisation and mostly translates into the daily work of the agency.

However, when it comes to stakeholder involvement, it is the view of the panel that this has not reached the necessary level yet and should be further elaborated to be in line with the objectives set out for AI. The discussion at the site visit revealed an uncertainty within AI about the level of involvement of stakeholders, in particular of HEIs that would be appropriate for an accreditation agency. If the agency, as stated in the mission and vision of the organisation, wants to contribute to the enhancement and further development of the quality work at the institutions, interactions with the HEIs needs to be adjusted to this and should go beyond information purposes by having a real dialogue on quality assurance of higher education. Some stakeholders at site visit gave testimonies

<sup>&</sup>lt;sup>15</sup> Al's self-assessment report, p. 29-32

about a close informal relation to AI, mainly through phone and email, when it comes to questions on AI procedures. This was of course highly appreciated by HEIs. The setup of STAR is another commendable initiative which seems to be on its way to find its forms. But to formalise and further develop the dialog on quality assurance issues with other stakeholders, such as HEIs and labour market representatives, would be an important next step in order to contribute to the enhancement of institutions quality work. The regular consultation of stakeholders on topics for thematic analysis is commendable but shouldn't be the only regular formalised involvement. This is particularly relevant because AI doesn't have an inbuilt stakeholder involvement within its structures. AI is a young organisation, and the panel sees many positive signs of the agency moving in the direction it states: from control to enhancement, but some further work will be needed in order for this approach to fully permeate the organisation.

### Panel commendations

The setup of STAR, Students Accreditation Council

### Panel recommendations

To further elaborate on stakeholder involvement in order to fulfil AI vision to contribute to the enhancement and further development of the quality work at institutions.

### Panel conclusion: Partially 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.

#### Previous review 2010. ESG 3.2, Standard fulfilment: Fully compliant

Recommendations 2010: None

#### Evidence

AI was established by law in 2007, as a professionally independent body within the state administration, under the Danish Ministry of Science, Innovation and Higher Education. This was reconfirmed in the Accreditation Act of 2013. <sup>16</sup>The Ordinance<sup>17</sup> from the Ministry sets out the criteria used in AI accreditations.

The institution is subject to state regulations, including the Danish Public Administration Act, the Danish Access to Public Administration Files Act and the Ministry of Finance's Budget Guidelines.

<sup>&</sup>lt;sup>16</sup> Al's self-assessment report, p. 51

<sup>&</sup>lt;sup>17</sup> <u>https://www.retsinformation.dk/Forms/R0710.aspx?id=173211#id558bcbd2-39f3-41e3-bf90-0c1077925218</u>

The organisation and responsibilities of AI is further elaborated in the introduction to this report, sections AI's organisation/structure and AI's functions, activities, procedures, pages 11-13.

### Analysis

Al is officially recognized as a legal entity under public law. Its responsibilities are set out in the Accreditation Act. The Act also sets out a framework for the different accreditations of higher education institutions and its programmes. The Act also includes a legal framework for the Accreditation Council, which makes decisions based on Al accreditation reports.

The interviews at site visit confirmed that AI has an established legal basis for its activities. The interviews also confirmed the outcomes of AI accreditation processes to have an overall acceptance within the Danish higher education system, the state and among stakeholders. The adoption of the Accreditation Act in 2013 was unanimously approved, which suggest a broad political agreement and acceptance by the public.

#### 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.

## Previous review 2010. ESG 3.6, Standard fulfilment: Fully compliant

Recommendations 2010: The Accreditation Institution should identify the whole set of accreditation criteria itself without ministerial interference and freely elaborate them. This would also provide the opportunity to create consistent criteria for all study programmes which run under the auspice of different ministries.

#### Evidence

AI is a professionally independent institution within the public administration involved in the accreditation of higher education institutions and their study programmes<sup>18</sup>. This means that AI is operationally independent from the Ministry of Higher Education, other ministries, HEIs and stakeholders.<sup>19</sup> AI is not subject to the power of instruction from the Minister of Higher Education concerning accreditation issues<sup>20</sup>. The same applies for the Accreditation Council which means that the minister cannot affect or reverse any of the Councils accreditation decisions.<sup>21</sup>

According to the Accreditation Act, the Minister for Science, Innovation and Higher Education lays down rules of procedure for both institutional and programme accreditations, including criteria.<sup>22</sup>AI

<sup>&</sup>lt;sup>18</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, Part 1

<sup>&</sup>lt;sup>19</sup> Al's self-assessment report, p. 52

<sup>&</sup>lt;sup>20</sup> Al's self-assessment report, p. 51

<sup>&</sup>lt;sup>21</sup> Al's self-assessment report, p. 53

 $<sup>^{\</sup>rm 22}$  Act on the Accreditation of Institutions of Higher Education, 12 June 2013 §8 and §14

is responsible for the further development of these generic procedures and for laying down methods for accreditations.

The Accreditation Act also stipulates the different responsibilities in the accreditation system, where AI has the sole responsibility for the accreditation procedures and the Accreditation Council takes the decisions based on the accreditation reports from AI.

The Accreditation Act also stipulates that the Executive Director of AI is appointed by the minister on the recommendation of the Accreditation Council.<sup>23</sup>

Al has the responsibility for the appointment of experts for the accreditation panel. The procedure for these appointments is further described in section ESG 2.4, Peer-review experts, and has been set out to ensure the independence of experts.

## Analysis

The panel found the legal basis for the agency to be clear. It is the panel's opinion that AI meets this standard as regards independence from higher education institutions, governments and other stakeholders. The panel finds the organisational independence to be clear. There is a legal framework that sets out the responsibilities of AI and it's also clear to the panel that AI has the operational independence and responsibility for setting up procedures and methods, even though a framework for this is set out in the Accreditation Act. The Accreditation Act also stipulates the criteria used in accreditations of higher education institutions and its programmes. This was touched upon in a recommendation from the previous panel in the ENQA review of 2010 (cf above quote of the recommendation). The site visit confirms that on the one hand the level of detail and the number of criteria has been changed and improved since the previous review. On the other hand it is AI that elaborates further the criteria stipulated in the law.

The site visit also clarified the level of independence between AI and the Accreditation Council. Although there is naturally a close collaboration between the two separate bodies the responsibilities are clearly divided between them. The Accreditation Council cannot interfere with AI for example as regards nomination of experts or the findings of the reviews. It can however suggest improvements of procedures, but it would still be the responsibility of AI to decide and implement possible changes. This also applies vice versa, the Director of AI cannot interfere with decisions made by the Accreditation Council.

The site visit confirms that nomination of experts to AI can be made, but it is clear to the panel that AI has the sole responsibility for the appointment of these experts independently from HEIS, governments or other stakeholders. AI has documents and routines for avoiding conflict of interest for experts. These are further described in section ESG 2.4, Peer-review experts.

The panel also discussed the fact that the Executive Director of AI is appointed by the minister. Since AI doesn't have any governing board or other bodies it is to be considered an appropriate solution to

<sup>&</sup>lt;sup>23</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, §2

this situation that the Executive Director is being nominated by the Accreditation Council which itself is an independent body with stakeholders being represented.

## 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.

## Previous review 2010. ESG 2.8, Standard fulfilment: Partially compliant

Recommendations 2010: None

## Evidence

According to the Accreditation Act AI must collect national and international experience of relevance to accreditation.<sup>24</sup> Therefore, AI conducts summary analysis based on the performed accreditations. There is for example a published report on the panels' views on the first round of institutional accreditations.<sup>25</sup> Another example would be a "Yearly Magazine 2015" with a summary of activities during 2015 also including different stakeholders' views, with a focus on the shift from programme accreditations to the first round of institutional accreditations.<sup>26</sup>

Beside these kind of summaries, AI publishes different analysis that touches upon more generic higher education themes, also available on AI web site.<sup>27</sup> This is in line with the agency's mission and vision where AI states: *Through broader analysis and communication, we can address additional, important quality aspects, including issue which are not included in accreditations. This we can inspire quality development in the sector [...].* 

Therefore, AI introduced a number of projects covering areas that AI has identified as themes that are relevant and challenging to the HEIs. Some themes come from the accreditation processes. The themes of the analyses published have been adopted after presentation to the HEI rector's conferences, to students in STAR and in meetings with employer organisations.<sup>28</sup> Ongoing projects mentioned in SAR<sup>29</sup> include reports on:

- The institutions knowledge of future labour market needs: How the institutions receive and use input from the labour market and other sources to develop their programmes. (published)
- *Small campuses*: The challenge and strength regarding the quality assurance of programmes at small campuses situated in another city than the main campus. (not yet published)

<sup>&</sup>lt;sup>24</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013 §2

<sup>&</sup>lt;sup>25</sup> <u>http://akkr.dk/2016/evaluering-af-panelmedlemmernes-erfaringer/</u>

<sup>&</sup>lt;sup>26</sup> <u>http://akkr.dk/publikationer/arsmagasin-2015/</u>

<sup>&</sup>lt;sup>27</sup> <u>http://akkr.dk/publikationer/</u>

http://akkr.dk/publikationer/arsmagasin-2015/

<sup>&</sup>lt;sup>28</sup> Al's self-assessment report, p. 54

<sup>&</sup>lt;sup>29</sup> Al's self-assessment report, p. 54

There are also projects on quality assurance of MOOCs and the use of external lecturers.

Al uses the results of these projects to foster a common understanding about the respective issues among stakeholders by disseminating them through its website, by discussing them at the regular meetings with stakeholders and in particular in the trainings and briefings of staff and panel members.

As mentioned in the introduction to this report, section Quality assurance, pages 10-11, the organisation EVA performs thematic evaluations within the higher education sector. An example of an ongoing project is about how students use their study time and another one about how labour market relevance of programmes could be strengthened<sup>30</sup>.

### Analysis

In previous ENQA review from 2010 the panel concluded AI to be a young organisation that showed plans for upcoming analysis more than evidence of existing ones. Since then the agency has published several thematic analysis and AI web site as well as the SAR report shows evidence of many ongoing projects on different themes. This is commendable. However, the site visit also revealed a certain level of confusion on the stakeholders' side as regards AI's role in the field of analyses as compared to EVA. The interviews at site visit showed appreciation of AI's thematic analyses which are closely related to the accreditation procedures and its outcomes, while other themes seemed to make the reader uncertain about the role of AI. The panel would therefore advise AI to be very clear about the purpose of the different analysis they are doing, especially in relation to the mandate of EVA and their evaluations of the higher education sector. The panel would suggest AI to carefully consider which analysis to do themselves and what would be the responsibility of EVA. This is also a question of using resources carefully and not putting too much burden on the HEIs, since both AI and EVA thematic analysis might include information gathering from the institutions.

The site visit confirms the different occasions for stakeholders to receive information about upcoming thematic analyses, but the panel would suggest AI to also put in place a formal feedback mechanisms on the analyses. This would provide AI with solid information on the relevance and usefulness of the thematic analyses, which would be an important basis for a long term planning of upcoming analyses.

#### Panel recommendations

The panel recommends AI to clarify the purpose of their analysis, especially in relation to the analysis of EVA and to communicate this to stakeholders.

The panel recommends AI to also consider setting up formal feedback mechanisms on the relevance and usefulness of their analyses.

https://www.eva.dk/projekter/2016/sammenhaeng-mellem-videregaende-uddannelse-og-arbejdsmarkedet

<sup>&</sup>lt;sup>30</sup> <u>https://www.eva.dk/projekter/2015/studieintensitet-hvordan-leverer-de-videregaende-uddannelser-fuldtidsuddannelser</u>

#### Panel conclusion: Fully compliant

#### ESG 3.5 RESOURCES

#### Standard:

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

## Previous review 2010. ESG 3.4, Standard fulfilment: Fully compliant

Recommendations: The panel recommends that further training be provides for staff and that they be offered special support in writing accreditation reports.

### Evidence

The majority of funding for AI is from the Danish government. A smaller income for the agency is the accreditation of study programmes abroad, which HEIs need to pay for. Another source of income could be that with a positive institutional accreditation HEIs are responsible for the accreditation of all programmes, and may contract AI or other quality assurance providers in this process. In 2012–2016 a total number of six new study programmes abroad was accredited by AI<sup>31</sup> Hence only a very small proportion of income was self-generated.

According to information at the site visit, AI budget from the government is set for a four year period. A yearly dialog with the Ministry of Education is taking place, but this does not include any negotiation for extra funding. The plan for accreditations is however negotiated with the higher education institutions, which means that AI can adjust the timing of accreditations evenly according to their resources. The only requirement is that all higher education institutions have undergone institutional accreditations within the six year cycle. The budget for AI should cover all costs for activities and staff.

Since the foundation of AI in 2007, there has been a continuous expansion of staff and especially in 2013 when parts of EVA activities where merged into AI. AI has the sole responsibility for staff employment. Only the Executive Director is employed by the Ministry of Education. Als current staff now reaches 42 FTE<sup>32</sup> These FTEs are distributed within AI as follows: Administrative Unit (7), PEM (14), UNIK (14) and Council Secretariat (6).

Seminars and courses for staff members are being held on different themes. Since the previous ENQA review in 2010 a language policy has been put in place as well as discussions on what consist "a good report". A large number of employees has followed a 15 week course in English writing and other courses and seminars have been held for relevant employees on language policy, administrative law, meeting management and teamwork.<sup>33</sup>

<sup>&</sup>lt;sup>31</sup> Supplement info sheet from AI: Supplementary Information requested by the ENQA secretariat, 9 February 2016.

<sup>&</sup>lt;sup>32</sup> Supplement info sheet from AI: Funding and Staff 2013-2015

<sup>&</sup>lt;sup>33</sup> Al's self-assessment report, Annex 1, Follow up 2012 and status 2016

### Analysis

The panel finds AI resources to be in balance. Evidence at site visit made clear that the agency has a possibility to adjust its accreditations to the allocated resources. Institutions cannot demand an accreditation to be performed at a certain time, as long as performed within the six year cycle. This allows the agency to balance work load according to staff resources. Site visit confirmed that resources are put on staff development activities and examples of different courses on various themes were given in interviews. The panel also commends the yearly individual meeting that is held with each staff member to discuss workload and possible needs for competence development.

Besides the individual activities, both written evidence and oral testimonies at site visit confirms a number of initiatives for the agency staff which the panel founds commendable.

#### 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.

**Previous review 2010. ESG 3.8 (Accountability procedures), Standard fulfilment:** Fully compliant *Recommendations: The Accreditation Institution could improve consideration of feedback by stakeholders.* 

#### Evidence

The agency has a memo<sup>34</sup> about the quality assurance of the work of the agency published on its web site. The policy refers to the professionalism of the employees and a thorough introduction of new staff members, the use of competent and qualified experts and the principles for their recruitment, consistency in processes and equal treatment of institutions, internal and external feedback mechanisms and communication with stakeholders.

The agency does not use subcontractors in accreditations.

#### Analysis

Both the SAR and the site visit gave evidence of several activities and procedures established to ensure the internal quality assurance of the agency. The agency puts a lot of effort in assuring consistency in reports and have several internal feedback mechanisms in place for this. In the quality assurance of programme accreditations, there is an emphasis on collegial feedback on reports, with experienced employees giving feedback on each programme accreditation report. The director of operations is part of the feedback team. Reports recommending a negative decision require extra meetings. In the quality assurance of institutional accreditations, the director of operations plays a

<sup>&</sup>lt;sup>34</sup> Quality assurance policy for the Danish Accreditation Institution, January 2016

more active role and participates at the panel's preparatory meeting and at the site visit. The report is discussed at several meetings where the Executive Director also participates. Beside these discussions on individual programme and institutional reports, there are also bi weekly meetings within PEM and UNIK, and on a monthly basis meetings with both units participating. Moreover, the site visit gave evidence of AI setting up internal working groups, to ensure the efficiency of AI accreditation procedures. These working groups will come up with recommendations on how to improve procedures. A second important aspect of assuring consistency and quality of the procedures is the selection and briefing of expert panels. It is to be highlighted that these procedures which are touched upon in section 2.4 are outstanding.

The panel finds it important to work in cross unit projects, in order to unify the organisation and its relations to the HEIs. External feedback on the procedures is gathered at an evaluation meeting with the HEI conducted after a decision by the Council, and yearly meetings with the Rectors conference. In addition AI uses discussions with stakeholders as mentioned in section ESG 3.1 (pages 16-18) to gather feedback at a more general level. In the ENQA review from 2010 AI was recommended to improve consideration of feedback by stakeholders. As elaborated further in section ESG 3.1 the panel recognises steps taken by AI in the right direction but still sees room for improvement.

The panel find these different quality assurance activities to be commendable and AI puts a serious effort in assuring the quality of procedures and reports. However, the panel believes the memo on the quality assurance policy need to be supplemented. The different procedures of AI should be put together into an internal quality assurance system. This system would need to highlight the essence in quality assurance, to deepen the understanding of why procedures are taking place. This especially goes for the purpose of external feedback mechanisms and how the relevant information gathered at these meetings is used. The agency's shift from focus on control to enhancement would need to be reflected upon in such a quality assurance system. How AI interacts with its stakeholders and why and the purpose of quality assurance.

What concerns feedback from the Council, there are the regular meetings in the Council where management from AI participates. But the panel would suggest a closer involvement from the Accreditation Council on the daily discussions on accreditation procedures. The evaluation meeting with HEIs is conducted after the decision from the Council, which means that the two processes cannot really be separated. The site visit revealed that stakeholders sometimes had difficulties understanding the different roles and responsibilities of AI and the Accreditation Council.

## Panel recommendations:

The panel recommends AI to supplement the memo on the quality assurance policy by adding descriptions of the various internal quality assurance procedures including responsibilities, timing etc.

## Panel conclusion: Substantially 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.

### Previous review 2010. ESG 3.8 (Accountability procedures), Standard fulfilment: Fully compliant

#### Evidence

According to the Accreditation Act, AI "must comply with international standards [...]", although there is no legal requirement for AI to undergo cyclical external review. However, according to information at the site visit there is a requirement for the accreditation system as such to undergo a review within five years. This review should focus on the workload of the HEIs, since the previous system for programme accreditations was criticised for being too bureaucratic and burdensome for the institutions. Such a review would of course include the accreditation activities of AI.

### Analysis

Although there is no legal requirement, AI has in practice undergone an external ENQA review in 2010 and is now up for their second review for continuous ENQA membership. Furthermore, the law requires a review of the whole accreditation system within five years, which would include AI procedures.

### 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.

#### Previous review 2010. ESG 2.1 Standard fulfilment: Substantially compliant

Recommendations: The Accreditation Institution should develop an approach that takes into account institutional internal quality assurance as a whole that is linked to study programmes. In addition to noting internal quality assurance the Accreditation Institution should put more emphasis on evaluation of its effectiveness as well.

#### Evidence

Since the previous review of 2010 the agency has shifted from only performing programme reviews to doing institutional accreditations as well, as described in the introduction to this report, section AI's function, activities, procedures pages 13-14. It has been a clear strive from AI point of view to move in this direction, but there has also been a broad political consensus on moving towards the HEIs being responsible for quality assurance. In line with this, the Accreditation Act states that institutions should undergo accreditation with focus on the ongoing systematic work of the

institution to safeguard and develop the quality and relevance of its study programmes<sup>35</sup>. Therefore, the HEIs responsibility for the quality assurance is a key element in both types of accreditations.<sup>36</sup>

For non-accredited institutions, the quality of their programmes is ensured by continued programme accreditations performed by AI. In these accreditations AI focuses on programmes with high number of students or institutions with a relatively high number of negative outcomes in previous reviews.<sup>37</sup> In AI reviews, the ESG part 1 is taken into consideration as follows:

## Institutional accreditation

ESG 1.1: policy for quality assurance (Criterion 1)<sup>38</sup> ESG 1.2: design and approval of new study programmes (Criterion 5) ESG 1.3: student-centred learning (Criterion 4) ESG 1.4: student admission and progression (Criterion 4) ESG 1.5: teaching staff related to the programmes (Criterion 3) ESG 1.6: facilities and learning resources (Criterion 4) ESG 1.7, ESG 1.9 and ESG 1.10: cyclical external quality assurance as well as analysis and use of information for effective management and on-going monitoring of programmes (Criteria 2, 3, 4 and 5) ESG 1.9: contact and dialogue with labour market stakeholders for the monitoring of the

ESG 1.9: contact and dialogue with labour market stakeholders for the monitoring of the programmes (Criterion 5)

## Programme accreditation<sup>39</sup>

ESG 1.3: student-centred learning (Criterion 4)

ESG 1.4: student admission and progression (Criteria 3 and 4)

ESG 1.5: teaching staff related to the programme (Criterion 2)

ESG 1.6: facilities and learning resources (Criterion 5)

ESG 1.7 and ESG 1.9: analysis and use of information for effective management and on-going monitoring of programmes (Criterion 5)

Due to Danish legislation, some aspects of part 1 of the ESG are not subject to accreditation, which are: Number of students admitted (part of ESG 1.4), recruitment of teaching staff (part of ESG 1.5), funding per student FTE (part of ESG 1.6), and public information (ESG 1.8). These aspects are regulated by national legislation and/or labour market agreements<sup>40</sup>. The assessment of students is also part of other higher education legislation, for example the Danish Ministerial Order on

<sup>&</sup>lt;sup>35</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, §6

<sup>&</sup>lt;sup>36</sup> Al's self-assessment report, p. 25

<sup>&</sup>lt;sup>37</sup> Al's self-assessment report, p.26

<sup>&</sup>lt;sup>38</sup> The criteria used in AI accreditations can be found in annex 6.

<sup>&</sup>lt;sup>39</sup> The accreditation process for study programmes intended to be offered abroad takes the standard criteria as points of departure, but special attention is given to the Danish HEI's responsibility in assuring the quality of the programme abroad.

<sup>&</sup>lt;sup>40</sup> Al's self-assessment report, p.25

Examinations, which ensures that a minimum of one third of the exams in each study programme is carried out by an external examiner<sup>41</sup>.

## Analysis

In the ENQA review of 2010 the agency was criticised for not taking into account the HEIs internal quality assurance as a whole when performing programme reviews. Since this review the agency has shifted from only performing programme reviews to doing institutional accreditations as well. The panel believes this is a positive way of marking the institutions responsibility for the quality assurance of their programmes. Furthermore, in accreditations of new and existing programmes the institutions quality assurance of programmes is taken into consideration whether in line with ESG or not (Criterion 5)

When it comes to addressing the effectiveness of an institution's IQA processes, the institutional accreditation is highly taking this into consideration since a positive outcome means that the institution is mature enough to take the responsibility for the quality assurance of the programmes they offer. If not, programme accreditations continues. According to the panel, this also is a way of recognising and supporting institutions in their responsibility for quality assurance.

As confirmed during site visit, there are a number of aspects of ESG that are not dealt with in Al accreditations, due to legal reasons. However, that does not mean that these aspects are not dealt with in the system. This is the point at which the system shows its complexity. At this stage, the reports from the external examiners for example are sent to the ministry and not to the agency responsible for external quality assurance. Furthermore student complaints on examinations would then be addressed also to the ministry and not part of Al quality assurance processes. Again, the panel would like to stress the importance of making assessment and examination of students being part of the whole student learning process and quality assurance activities, instead of being just a complaints procedure.

In general, the panel would suggest making more explicit reference to the new ESG 2015 in a revision of accreditation criteria. These references can be perceived as somewhat unclear to HEIs in criteria used today and the panel believes AI could take a more active role in communicating the ESG 2015.

However, the panel learned in interviews at site visit that there is a recent announcement from the new Minister of Higher Education to overlook the steering system of the higher education sector, which would include the accreditation activities. In this process the panel would suggest taking into consideration the focus on student centred learning and the assessment of students in the ESG 2015. The panel believes this to be an important aspect of external quality assurance and its link to the internal work at the institution.

Also the issue of relevance of programmes seems to be somewhat complex. On one hand the institutions responsibility for quality is stressed, on the other hand the Ministry (on the basis of recommendation from RUVU) will decide if a study programme is relevant or not. And to make it

<sup>&</sup>lt;sup>41</sup> Al's self-assessment report, p.25

even more complex, the panel learned in interviews with the Ministry that relevance is not to be seen as a quality aspect, nevertheless it still is a criterion in both institutional and programme accreditations. However, according to information at site visits, the accreditation of programmes is foreseen to fade out after 2019, when all the HEIs are assumed to have accomplished their institutional accreditations. Hence as regards programme accreditation this shouldn't be considered as an issue.

#### Panel recommendations

The panel recommends AI to advocate for integrating all aspects of part I of the ESG into the accreditation criteria when the envisaged reform of the accreditation system is going to take place.

### Panel conclusion: Substantially 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.

### Previous review 2010: ESG 2.2. Standard fulfilment: Fully compliant

Recommendations: We suggest to the Accreditation Institution endeavour to increase involvement of HEIs and students in the ownership of the accreditation guidelines and procedures. This would allow HEIs to better transfer the quality/accreditation requirements into their institutional practice.

#### Evidence

According to the mission and vision the purpose of AI is to ensure quality and relevance at all higher education institutions. The purpose is therefore to improve the quality of programmes and to help create a more coherent and transparent education market for the benefit of students, labour market and HEIs.<sup>42</sup>

Al sees the accreditation process as a central part of the quality work at the HEIs. The accreditation process as such is a way of supporting institutions through the identification of problems, to promote quality improvements and to motivate continued development.<sup>43</sup>

Al self-assessment report also states that it differs how far institutions have come in developing their own internal quality assurance<sup>44</sup>. A key focal point in Al institutional accreditations has therefore been to support the institutions development of their internal quality assurance<sup>45</sup>. Institutions possibility to demonstrate improvements is for example done by a SWOT in their SER to Al.

<sup>&</sup>lt;sup>42</sup> Mission and vision, August 2015

<sup>&</sup>lt;sup>43</sup> Mission and vision, August 2015

<sup>&</sup>lt;sup>44</sup> Al's self-assessment report, p. 25

<sup>&</sup>lt;sup>45</sup> Al's self-assessment report, p. 25

During the design of the new accreditation procedures, notably the institutional accreditation, stakeholders in general were involved in various ways, on the one hand through consultations by the Ministry and the Accreditation Council, on the other hand through formal and informal feedback on the operationalization of the criteria and the design of the procedure by AI.

After implementation of the procedures, meetings with HEIs are held when an institution or its programme is subject to accreditation. The accreditations of institutions and existing programmes starts with an information meeting and concludes with a follow-up meeting where the accreditation process is evaluated.

## Analysis

The panel finds in general that AI methods are defined and designed to ensure that the aims and objectives for external quality assurance are achieved.

When introducing institutional accreditation as an alternative to programme accreditation AI put more emphasis on the developmental dimension of external quality assurance. This approach is particularly supported by the design of the criteria for institutional accreditation which allows for different internal quality assurance systems and hence strengthen the higher education institutions' autonomy.

However, the panel finds that in one particular aspect the enhancement orientation should be strengthened even more. As a matter of fact AI doesn't give recommendations to the higher education institutions in programme accreditations and in case of negative decisions in institutional accreditations. Since programme accreditation will cease within the coming two years, it might not be necessary to modify the regulations but AI should consider to give recommendations in all accreditation procedures as one core element to support further developments at the higher education institutions.

What was also touched upon in the ENQA review of 2010, is the level of workload in institutions. The previous programme evaluation model has been criticised for being too bureaucratic and putting too much burden in the HEIs. The panel sees a general change and improvement what concerns workload, since AI has shifted focus to institutional accreditations instead of an external reaccreditation of all programmes in Denmark. To lessen the workload on institutions has also been a clear ambition from AI. Nevertheless, the institutional accreditations seem to generate a substantial amount of documentation, which could be questioned the necessity of. Interviews at site visit confirmed that the HEIs submits a large amount of annexed data "just in case", i.e. the underlying purpose of the data has not been made clear to the institutions, and also data which is primarily used by the ministry for various purposes. This unclarity seems to lead to a lot of work for all parties involved: HEIs, the panels and AI.

Another remark from the panel would concern the follow-ups, or rather the lack of follow-ups in AI quality assurance model. A formalized follow-up is limited to those institutions or programmes receiving conditional positive accreditation. Again, the panel would like to stress that if AI intention is to contribute to the further quality enhancement at HEIs, an integrated follow-up procedure would be an important part of the process. To leave a positively accredited institution for a follow-

up within the next accreditation after six years, is from the panel's perspective not a way of continuously contributing to the individual institutions quality work.

A final concern for the panel would be Al's stakeholder involvement. As touched upon previously in section 3.6, pages 24-25, the panel sees room for improvement when it comes to stakeholder involvement in particular in the design of AI methodologies. This was raised already in the previous ENQA review of 2010, and the panel recognises measures taken in this direction by AI. Whereas stakeholder involvement in the analysis of the newly implemented institutional accreditation was close, the panel finds that the level of involvement can be increased in the design of new procedures where AI played a less proactive role in involving stakeholders. It is however to be mentioned that the structure of the Danish accreditation system with its various actors might have contributed to this. It is in the first place the ministry that designs the criteria and hence would have to involve stakeholders. However, since stakeholders perceive AI as the core actor in the system, it should take the lead in all discussions about criteria and procedures. Strengthening its role in discussions vis a vis the Accreditation Council and the ministry might also help creating ownership on the side of stakeholders. In particular since the move to a more enhancement oriented approach close collaboration between AI and the stakeholders, in particular the higher education institutions, are paramount.

Al should also pay attention to possible differences between PEM and UNIK when it comes to stakeholder interactions with the HEIs. The site visit confirms an increasing interaction between the two units, which is a commendable move in the right direction. Concerning stakeholder involvement, the panel would commend AI for the STAR initiative which has the potential of being developed into an important fora for both AI and students.

## Panel recommendations

The panel recommends to further reduce workload and the amount of documentation gathered in the institutional accreditations, making clear what data to require and for what purposes.

The panel recommends AI to introduce follow-up procedures in all accreditations.

The panel recommends AI to play the lead role in the discussions about designing new procedures.

The panel recommends AI to intensify stakeholder involvement, in particular in the design of AI methodologies.

## Panel conclusion: Partially 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

## Previous review 2010: ESG 3.7. Standard fulfilment: Substantially compliant

Recommendations: The Accreditation Institution should consider how to include experts also for accreditation of new study programmes. The Accreditation Institution should further work on consistency of site visits in terms of expert teams and ACE Denmark's staff role in the teams.

## Evidence

Annexed to AI self-assessment report, there are published guides for each accreditation component: Guide to institutional accreditation, guide to accreditation of existing programmes and a guide for the accreditation of new programmes. These guides describe in detail the different accreditation procedures along with sections on the criteria and guidance to institutions on how to report on each criterion. The different accreditation processes are also described in a Procedures Handbook, which is an internal document for AI staff with descriptions of methodologies and processes used in each accreditation. In general, programme accreditations are based on a fixed set of assessment point while in institutional accreditations, the institutions themselves are responsible for designing and applying a system that ensures and develops quality and relevance of their programmes.<sup>46</sup>

All accreditation processes include a self-assessment report, supplemented with key figures on institutional or programme level. In institutional accreditations, there are two site visits: the first visit last for two days and the second two to five days depending on the size of the institution. Site visits for existing programmes last for one day, but accreditation of new programmes is based on written documentation and no site visit is included.

All accreditation processes result in a report, which is published on the Accreditation Council web site together with the council's decision on the accreditation. The institutional accreditations are published on AI web site as well.

Positive programme and institutional accreditation do not include a follow-up procedure, but will form part of the next accreditation cycle. For those institutions or study programmes receiving a conditional positive accreditation, where one or more accreditation criteria are not met, a follow-up decision must have been taken by the Accreditation Council within two years.

AI has set up procedures for Danish study programmes being offered abroad, available on AI web site<sup>47</sup>. So far six programmes have been accredited since 2012. In the accreditation process for these programmes AI uses the standard criteria for programme accreditation, even though special attention is given to the Danish HEI's responsibility in assuring the quality of the study programme offered abroad and to the specific mechanisms applied.

## Analysis

<sup>&</sup>lt;sup>46</sup> Al's self-assessment report, p. 28

<sup>&</sup>lt;sup>47</sup> <u>http://akkr.dk/vejledninger/nye-uddannelser/</u>

The panel finds the external quality assurance processes in general to be reliable and pre-defined. Information about the accreditation processes is presented very transparently in the published guidebooks for each accreditation activity. This is good practice and commendable. These guides are valuable tools both to institutions and experts. Furthermore, the panel finds the accreditation procedures to be implemented professionally and consistently. Site visit confirmed that AI has done a commendable effort in training and supporting panels throughout the accreditation process and in assuring consistency in conducting the procedures through various regular formalized internal consultation of colleagues and superior staff. The work on the Procedures handbook for AI staff, should also be mentioned as important in achieving a professional and consistent accreditation reports supports consistency between the procedures. After that AI's staff has drafted the first version of the report the whole panel convenes for a day in order to discuss the whole draft in detail.<sup>48</sup> Site visit also confirmed a more positive acceptance from HEIs of the external quality assurance activities performed by AI now, compared to a more negative situation in 2010.

As recommended previously, the panel sees room for a more consistent follow-up, also for the positive accreditations. This would be an important part of AI intentions towards an enhancement led accreditation process.

A minor comment relates to the two practices of the two units UNIK and PEM which apply slightly different procedures in certain steps of the procedures. Although this does not cause any inconsistencies of procedures within a sector, the panel couldn't find reason for these differences other than inherited variations in conducting reviews. It is natural that after a merger these differences exist and the panel recommends AI to continue in harmonising the standard procedures of the two units.

#### Panel commendations

Al is to be commended for its measures to assure consistency in conducting the reviews and preparing the reports.

#### **Panel recommendations**

The panel recommends AI to introduce follow-up procedures in all accreditations.

#### Panel conclusion: Substantially compliant

#### ESG 2.4 PEER-REVIEW EXPERTS

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

#### Previous review 2010: ESG 2.4 Standard fulfilment: Substantially compliant

Recommendations: The Accreditation Institution should consider how to include experts also for accreditation of new study programmes.

Standard:

<sup>&</sup>lt;sup>48</sup> Such a meeting with the panel is held in institutional accreditations only

The Accreditation Institution should consider involving more than one academic expert in the accreditation of existing study programmes.

### Evidence

Al has adopted principles for the recruitment of members for the expert panels. These cover all the requirements for each category of panel member in programme and institutional accreditations. The principles also ensure international representation as well as participation by a student and an employer representative. The principles can be found in the Procedure Handbook.<sup>49</sup> For institutional accreditations, there is also an additional document, and a more detailed description of the different roles and responsibilities in the panel.<sup>50</sup>

**Institutional accreditations**: a panel with experience from QA of a similar institution, management of a similar institution and QA from another sector than the higher education sector. The panel includes student with board or management experience from similar institution.<sup>51</sup>

In the start-up dialogue, the institution can suggest persons or profiles for the panel. If the accreditation is in Danish, the panel will be composed primarily of Danish, Norwegian and Swedish panel members. If the accreditation is in English, the panel members can be selected from other European countries.<sup>52</sup>

The accreditation panel has at least three members and consists of professional experts who among them have experience from the higher education sector in general, as well as from the international quality assurance of educational institutions.<sup>53</sup>

**Accreditation of existing programmes**: two subject experts that cover the discipline(s) of the study programme. The panel also includes a student and an employer representative. For accreditations at universities the subject experts conduct relevant research at an institution abroad.<sup>54</sup>

Accreditation of new programmes: two subject experts and a student.

**For new and existing programmes**<sup>55</sup>: Al sets up an accreditation panel composed of at least three panel members who, together, have experience in the higher education sector and in quality assurance of programmes. A typical panel for new programmes consists of two experts and one student. A panel for existing programmes also has an employer representative. One of the two experts has experience in planning and organisation of programmes. The employer representative is not part of the assessment of new programmes, as the need for the programme has already been established in the pre-qualification process made by RUVU.<sup>56</sup>

<sup>&</sup>lt;sup>49</sup> Al's self-assessment report, Annex G

<sup>&</sup>lt;sup>50</sup> Paneler i institutionsakkrediteringssystemet, 5 november 2013

<sup>&</sup>lt;sup>51</sup> Al's self-assessment report, p. 38

<sup>&</sup>lt;sup>52</sup> Procedure handbook, p. 6

<sup>&</sup>lt;sup>53</sup> Act on the Accreditation of Institutions of Higher Education, 12 June 2013, Part 3

<sup>&</sup>lt;sup>54</sup> Al's self-assessment report, p.39

<sup>&</sup>lt;sup>55</sup> These are general procedures normally used in the accreditation of programmes offered by Danish HEIs in Denmark and abroad.

<sup>&</sup>lt;sup>56</sup> Procedures handbook, p. 16

Al holds a one day training for the panel members in programme accreditations, and a two days training for panels in institutional accreditations.

The procedures of AI also contain no-conflict of interest mechanisms in line with the legal framework in Denmark in Public Administration. This does for example mean that a panel member cannot have had any employment at the institution in question for the past two years<sup>57</sup>.

Panel members receive a training which focuses on the criteria and rules of procedure and the role of the experts. In addition every panel holds a preparatory meeting before the site visit starts.

### Analysis

The panel believes the procedures for the recruitment and training of experts to be solid and clear. The Procedures Handbook as well as supplement documents give clear guidance on the requirement for each category of panel member, what is expected and the different roles and responsibilities. The panel finds that AI is to be commended for the way it trains, briefs and supports the panels' work which can be characterized as highly professional and sound. The interviews at site visit also confirmed that panel members had appropriate training and where well prepared for their assignment.

The review experts emphasised their appreciation of the support in review process given from AI staff. They gave evidence of AI staff having in depth knowledge about the documentation for the review and supporting the panel throughout the site visit. Due to the complexity of institutional accreditation more staff is involved than in programme accreditation, in average there are three to four AI staff members participating in each institutional accreditation.

#### **Panel commendations**

Al is to be commended for high quality support to the work of the panels.

#### 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.

## Previous review 2010: ESG 2.3. Standard fulfilment: Fully compliant

## Previous review 2010: ESG 3.7. Standard fulfilment: Substantially compliant

#### Evidence

<sup>&</sup>lt;sup>57</sup> Procedures handbook

The accreditation criteria are laid down in the Accreditation order, by the Minister of higher education and available on Al's web site<sup>58</sup>. There are different criteria for the accreditation of programmes and those of institutions.

Al also provides guides for the different accreditations. These are also available on Al website and contains information on each criteria.

The procedures lead to a formal decision on accreditation taken by the Accreditation Council. In these cases, interpretation of criteria 1 for programmes, is decided by the Ministry of higher education based on a recommendation from RUVU. The accreditation process as such is further elaborated in section ESG 2.3, page 30-32 as well as in the introduction to this report, section Al's functions, activities, procedures on page 13-14.

## Analysis

The panel believes both criteria and documents related to the accreditation procedures to be clear and publicly available on AI web site.

The panel also sees measures taken by AI to assure consistency in the interpretation of criteria. There is for example a template for each type of accreditation to be used in reporting. Furthermore, as mentioned in ESG 3.6, pages 23-24, there are several internal quality assurance steps taken in order to assure a consistent judgement in the accreditations.

## 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.

## Previous review 2010: ESG 2.5. Standard fulfilment: Fully compliant

Recommendations: We recommend to the Accreditation Institution that it tries to further develop the accreditation reports in a way that is more comprehensive and useful for a general reader.

## Evidence

As mentioned in ESG 2.5, page 34, all reports follow a given template for each type of accreditation.

**Programme accreditation assessments contain**: a recommendation to the Accreditation Council on the accreditation decision; basic information; competency profile of the study programme; structure

<sup>&</sup>lt;sup>58</sup> <u>http://akkr.dk/akkreditering/kriterier/</u>

of the study programme; information on the accreditation panel; assessment of each of the criteria; timetable; the case processing etc.; assessment.

**Institutional accreditation reports contain**: introduction; a summary of assessments and a recommendation to the Accreditation Council on the accreditation decision; information on the panel; basic portrait of the institution; assessment of each of the criteria; methodology; audit trails; case processing and timetable; schedules for site-visits; key indicators.<sup>59</sup> Positive accreditation reports contain recommendations for further development.

All accreditation reports, programme and institutional, are accessible on the website of the Accreditation Council<sup>60</sup> after a decision on the report is taken. There is a direct link to these reports and decisions on AI web site as well.

All accreditation reports, programme and institutional, are submitted to HEIs for a so called hearing<sup>61</sup>, where the institution is given the possibility to check the factual accuracy of the report.

#### Analysis

The panel believes the structure and format of AI reports in general to be clear and concise. However the panel would like to point out a few things that would make reports more in line with what the panel understands to be the intensions of AI. In the AI documentation to this review as well as in interviews, the agency is very clear about the movement from an accreditation model purely based on control towards a more enhancement led approach. The panel believes the report, the feedback to the HEI, to be an important tool in achieving this. AI is putting a lot of commendable efforts in assurance consistency in reports, but might need to work more on how to actually use the reports as a contribution to the further enhancement of institutions quality work. The panel sees no logic in why recommendations for quality enhancement would be inappropriate in reports with a conditionally positive or a negative outcome. A recommendation can be written in many ways and does not have to be used as a legal requirement for the institution to comply with.

Furthermore, AI struggles with the readability of reports for the general reader. The panel agrees that the core purpose of the reports is to serve as solid basis for the accreditation decision and to give information to the institution. However, for a wider audience, accessibility and readability could be enhanced by adding a summary to the report, beside the overall assessment and recommendation given to the Accreditation Council. This might be a way of reaching out to a wider public without having to write the report in a structure and style that would be inappropriate for its core purpose.

#### Panel recommendations

The panel recommends AI to consider giving recommendations in all reports and to add a summary to the reports.

<sup>&</sup>lt;sup>59</sup> Al's self-assessment report, p. 44

<sup>60</sup> http://akkrediteringsraadet.dk/

<sup>&</sup>lt;sup>61</sup> Al's self-assessment report, p. 35

#### Panel conclusion: Substantially 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.

#### Previous review 2010: ESG 2.7. Standard fulfilment: Fully compliant

#### Previous review 2010: ESG 3.7 Standard fulfilment: Substantially compliant

#### Evidence

The legal framework does not provide an appeals procedure as regards the accreditation decision taken by the Accreditation Council which cannot be reversed by any other authority. This is to ensure the independence of the council being the only body to make decisions on accreditations.<sup>62</sup>

However, according to the Accreditation Act there is a possibility to appeal against legal errors and omissions in the accreditation procedures, within 14 days to Danish Agency for Universities and Internationalisation<sup>63</sup> since all decisions should be made in a fair and equitable manner and to ensure that all HEIs are treated equally.

As mentioned in section ESG 2.6 all accreditation reports are submitted to HEIs for a so called hearing, where the institution is given the possibility to check the factual accuracy of the report. Furthermore, if the Accreditation Council decides against the accreditation report's recommendation, the institution is given the opportunity to have another hearing<sup>64</sup>.

#### Analysis

Due to the legal framework no formal appeals procedure is in place, since the decision of the Accreditation Council is final and cannot be reversed.

Within the area of responsibility of AI, which means before the submission of the report to the Accreditation Council, the panel believes that the AI procedure to give the HEIs the possibility to check the accuracy of reports is good, but cannot really replace a formal possibility to complain about the procedure. However, the panel learned during the site visit that in practice higher education institutions do have an opportunity to complain if they are not satisfied with how the procedure was conducted and they also use this opportunity. This happens between the submission of the report by AI and the decision by the Accreditation Council, i.e. some HEIs where given the opportunity to prolong the accreditation decision processes, handing in more evidence in the phase between AI accreditation report and the Accreditation Council's decision, some even up to 6 months while others were given and respected much shorter deadlines. The panel believes it would be important for the transparency of the agency not only to give equal rights to all HEIs in the

<sup>&</sup>lt;sup>62</sup> Al's self-assessment report, p.47

<sup>&</sup>lt;sup>63</sup> Al's self-assessment report, Annex J: Institutional accreditation of Copenhagen Business School

<sup>&</sup>lt;sup>64</sup> Al's self-assessment report, p. 46

accreditation process, but also to formalise these procedures. Since the legal framework hinders the HEIs to appeal the Accreditation Councils decisions, all other opportunities for HEIs to give input on the accreditations becomes even more important.

#### Panel recommendations

The panel would recommend AI to formalise and make transparent to all HEIs when and how opportunities are given to complain.

#### Panel conclusion: Partially compliant

## ADDITIONAL OBSERVATIONS The complexity of the Danish surveillance of the higher education sector

The Danish accreditation system is characterized by a certain complexity which affects Al's level of compliance with the ESG and which therefore shall be highlighted in the following:

The criteria applied to Danish higher education institutions and to the programmes do not differ from what is in place in other national accreditation systems. However, the organisational structure and the division of responsibilities within the accreditation system to addressing the various aspects of the quality of programmes have some peculiarities.

Four major players are involved in the accreditation of programmes: AI is responsible for conducting the accreditation procedures, based on criteria and regulations stipulated by law and operationalized by AI itself. The accreditation decisions are taken by the Accreditation Council as a separate legal entity. This is not to be considered as a problem since the responsibilities are clear and AI can perform its tasks independently. Even more so as AI is perceived by stakeholders as the most relevant actor in the field in terms of assuring quality. What is peculiar are the roles of the ministry and, commissioned by the ministry, the RUVU. One might expect that the relevance in terms of labour market relevance is a key aspect of the quality of a programme. This aspect however is assessed by RUVU and decided upon by the ministry outside the accreditation procedure of new programmes as a precondition for the application to the procedure. Notwithstanding this labour market experts form part of the accreditation panels which is not straightforward. Also numbers of student enrolment is not an aspect to be addressed in the accreditation procedure, although the admission procedures are. Again the same applies for regulations of student assessments which without doubt represent an important feature of the quality of a programme. Also this aspect is regulated by law and not part of the accreditation procedure but its implementation is overseen by the ministry which means that there is no kind of independent quality assurance of this aspect in place which cannot be considered good practice.

During the site visit the panel learned that the reason for the fact that the decision on the relevance of a new programme is taken by the ministry beforehand is to be able to steer the higher education system in terms of numbers and profiles of certain programmes in the various fields and the various regions of Denmark. There's no reason for questioning this task of the ministry but it seems odd to separate the assessment of a core element of the quality of a programme from the peer-based assessment of the new programme as a whole.

As mentioned in section ESG 2.1 the upcoming revision of the overall steering system of the higher education sector, which would include the accreditation activities might be an opportunity to consider taking into account labour market relevance also in the accreditation procedures.

This is a good example for a challenge in reviewing quality assurance agencies. The responsibilities of agencies might lack some aspects which one would normally expect them to have. As can be seen in the Danish case this does not necessarily mean that these quality related aspects are not dealt with at all but are maybe dealt with by other actors in the higher education system.

# CONCLUSION

#### **SUMMARY OF COMMENDATIONS**

Al is to be commended for:

- 2.3: its measures to assure consistency in conducting the reviews and preparing the reports.
- 2.4: high quality support to the work of the panels.
- 3.1: the setup of STAR, Students Accreditation Council

#### **OVERALL FINDINGS AND RECOMMENDATIONS**

Overall, AI should be described as a well-established quality assurance agency, recognized by all stakeholders. The shift to institutional accreditations has been an important step in putting emphasise on the higher education institutions' own responsibility for the quality assurance of their programmes. The panel acknowledges the progress AI has made since the new organisational set up and the introduction of institutional accreditation. The emphasis AI puts on its vision to support and contribute to the further enhancement of the institutions own quality work is commendable, although the panel sees room for further improvements in order for this approach to reach its full potential. As regards the practical work, the panel found the level of professionalism in conducting the reviews, in particular in preparing and supporting the peers and in the drafting of the reports very high and commends AI for its work. In times of change self-reflection is a very important feature of the work of a quality assurance agency in particular when being on the way to move the procedures from a more control-oriented to a more enhancement oriented approach. Therefor internal quality assurance has to play an important role and AI is recommended to develop its internal quality assurance mechanisms further as well as its engagement with stakeholders.

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

The ESG where full compliance has not been achieved are:

ESG 2.1, 2.3, 2.6, 3.6 (substantially compliant) and ESG 2.2, 2.7, 3.1 (partially compliant) and the agency is recommended to take appropriate action, so far as it is empowered to do so, to achieve full compliance with these standards at the earliest opportunity.

#### RECOMMENDATIONS

The panel recommends AI to:

2.1: advocate for integrating all aspects of part I of the ESG into the accreditation criteria when the envisaged reform of the accreditation system is going to take place

2.2: further reduce workload and the amount of documentation gathered in the institutional accreditations, making clear what data to require and for what purposes, introduce follow-up procedures in all accreditations, play the lead role in the discussions about designing new procedures and to intensify stakeholder involvement, in particular in the design of AI methodologies.

2.3: introduce follow-up procedures in all accreditations

2.6: consider giving recommendations in all reports and to add a summary in reports

2.7: formalise and make transparent to all HEIs when and how opportunities are given to complain

3.1: further elaborate on stakeholder involvement in order to fulfil AI vision to contribute to the enhancement and further development of the quality work at institutions

3.4: clarify the purpose of their analysis, especially in relation to the analysis of EVA and to communicate this to stakeholders, consider setting up formal feedback mechanisms on the relevance and usefulness of their analysis

3.6: supplement the memo on the quality assurance policy by adding descriptions of the various internal quality assurance procedures including responsibilities, timing etc.

# ANNEXES

#### ANNEX 1: 2010 AND 2016 EXTERNAL REVIEWS: A COMPARATIVE OVERVIEW OF THE FINDINGS

|  | 2010 review   |   | 2016 review                |  |
|--|---|---|----------------------------|--|
| ENQA Criterion/ESG   | Level of Recommendation(s)                                  |   | Level of Recommendation(s) |  |
| ESG 2.1 Consideration of<br>Internal quality assurance<br>(formerly ESG 2.1)         | Substantially<br>compliant                                  | The Accreditation Institution should develop an approach that<br>takes into account institutional internal quality assurance as a<br>whole that is linked to study programmes.<br>In addition to noting internal quality assurance the<br>Accreditation Institution should put more emphasis on<br>evaluation of its effectiveness as well.   | Substantially<br>compliant | The panel recommends AI to advocate for integrating all aspects<br>of part I of the ESG into the accreditation criteria when the<br>envisaged reform of the accreditation system is going to take<br>place.  |
| ESG 2.2 DESIGNING<br>METHODOLOGIES FIT FOR PURPOSE<br>(FORMERLY ESG 2.2 AND ESG 2.4) | 2.2 Fully<br>compliant<br>2.4<br>Substantially<br>compliant | We suggest to the Accreditation Institution endeavour to<br>increase involvement of HEIs and students in the ownership of<br>the accreditation guidelines and procedures. This would allow<br>HEIs to better transfer the quality / accreditation requirements<br>into their institutional practice.<br>The Accreditation Institution should consider how to include<br>experts also for accreditation of new study programmes.<br>The Accreditation Institution should consider involving more<br>than one academic expert in the accreditation of existing study<br>programmes. | Partially<br>compliant     | The panel recommends to further reduce workload and the<br>amount of documentation gathered in the institutional<br>accreditations, making clear what data to require and for what<br>purposes.<br>The panel recommends AI to introduce follow up procedures in all<br>accreditations.<br>The panel recommends AI to play the lead role in the discussions<br>about designing new procedures.<br>The panel recommends AI to intensify stakeholder involvement, in<br>particular in the design of AI methodologies. |
| ESG 2.3 IMPLEMENTING PROCESSES<br>(FORMERLY ESG 2.6 AND 3.7)                         | 2.6 Fully<br>compliant                                      | The panel realises that in the context of such strict accreditation<br>system there is no legal need or opportunity for follow up after<br>the positive decision. However, in order to ensure further<br>development of institutional quality, we suggest the<br>Accreditation Institution to develop follow up procedures to<br>offer support to HEIs even in case of positive accreditation.  | Substantially<br>compliant | The panel recommends AI to introduce follow up procedures in all accreditations.   |
| ESG 2.4 PEER-REVIEW EXPERTS<br>(FORMERLY ESG 3.7)                                    | Substantially<br>compliant                                  | The Accreditation Institution should consider how to include<br>experts also for accreditation of new study programmes.<br>The Accreditation Institution should further work on<br>consistency of site visits in terms of expert teams and ACE  | Fully<br>compliant         |  |

|  |   | Denmark's staff role in the teams.  |                            |   |
|--|---|---|----------------------------|---|
| ESG 2.5 CRITERIA FOR OUTCOMES<br>(FORMERLY ESG 2.3 AND 3.7)  | 2.3 Fully<br>compliant  |   | Fully<br>compliant         |   |
| ESG 2.6 REPORTING (FORMERLY<br>ESG 2.5)  | Fully<br>compliant  | We recommend to the Accreditation Institution that it tries to<br>further develop the accreditation reports in a way that is more<br>comprehensive and useful for a general reader.   | Substantially<br>compliant | The panel recommends AI to consider giving recommendations in all reports and to add a summary to the reports.  |
| ESG 2.7 COMPLAINTS AND APPEALS<br>(FORMERLY ESG 2.7 AND 3.7<br>[GUIDELINE])                          | 2.7 Fully<br>compliant<br>3.7<br>Substantially<br>compliant                           |   | Partially<br>compliant     | The panel would recommend AI to formalise and make<br>transparent to all HEIs when and how opportunities are given to<br>complain.  |
| 3.1 ACTIVITIES, POLICY AND<br>PROCESSES FOR QUALITY<br>ASSURANCE (FORMERLY ESG 3.1,<br>3.3, AND 3.5) | 3.1<br>Substantially<br>compliant<br>3.3 Fully<br>compliant<br>3.5 Fully<br>compliant |   | Partially<br>compliant     | To further elaborate on stakeholder involvement in order to fulfil<br>Al vision to contribute to the enhancement and further<br>development of the quality work at institutions.  |
| 3.2 OFFICIAL STATUS (FORMERLY<br>ESG 3.2)  | Fully<br>compliant  |   | Fully<br>compliant         |   |
| 3.3 INDEPENDENCE (FORMERLY<br>ESG 3.6)   | Fully<br>compliant  | The Accreditation Institution should identify the whole set of<br>accreditation criteria itself without ministerial interference and<br>freely elaborate them. This would also provide the opportunity<br>to create consistent criteria for all study programmes which run<br>under the auspices of different ministries. | Fully<br>compliant         |   |
| 3.4 THEMATIC ANALYSIS (FORMERLY<br>ESG 2.8)  | Partially<br>compliant  |   | Fully<br>compliant         | The panel recommends AI to clarify the purpose of their analysis,<br>especially in relation to the analysis of EVA and to communicate<br>this to stakeholders.<br>The panel recommends AI to also consider setting up formal<br>feedback mechanisms on the relevance and usefulness of their<br>analyses. |

| 3.5 RESOURCES (FORMERLY ESG<br>3.4)  | Fully<br>compliant | The panel recommends that further training be provided for staff and that they be offered special support in writing accreditation reports. | Fully<br>compliant |  |
|--|--------------------|---|--------------------|--|
| 3.6 INTERNAL QUALITY ASSURANCE<br>AND PROFESSIONAL CONDUCT<br>(FORMERLY ESG 3.8) | Fully<br>compliant | The Accreditation Institution could improve consideration of feedback by stakeholders.  | Substantially      | The panel recommends AI to supplement the memo on the quality<br>assurance policy by adding descriptions of the various internal<br>quality assurance procedures including responsibilities, timing etc. |
| 3.7 CYCLICAL EXTERNAL REVIEW OF<br>AGENCIES (FORMERLY ESG 3.8<br>[GUIDELINE])    |                    |   | Fully<br>compliant |  |

#### ANNEX 2: PROGRAMME OF THE SITE VISIT

|             |  | MONDAY, 11.04.2016   |                                 |                   |
|-------------|--|--|---------------------------------|-------------------|
|             | Review Panel's kick-off meeting and  |  |                                 |                   |
|             | preparations for day I   |  |                                 |                   |
| 16.00-16.45 | The context in which the institution   | Director of Analysis and Council   | The panel asks questions to AI. |                   |
|             | operates.  | Management Rune Heiberg  |                                 |                   |
| 16.45-19.00 | The Panel's preparatory meeting  |  |                                 |                   |
| 19.15       | Dinner at hotel  | Panel only   |                                 |                   |
|             |  | TUESDAY, <b>12.04.2016</b>   |                                 |                   |
| TIMING      | ТОРІС  | PERSONS FOR REVIEW   | ISSUES TO BE DISCUSSED          | LEAD PANEL MEMBER |
| 08.00       | Meeting with the Executive Director<br>of the Accreditation Institution and<br>the Chairman of the Accreditation | Executive Director Anette Dørge<br>Chairman of the Accreditation Counsil   |                                 |                   |
|             | Council  | Per B. Christensen   |                                 |                   |
| 8.45        | Private meeting of the Review Panel  |  |                                 |                   |
| 9.45        | Meeting with the team responsible<br>for preparation of the self-<br>assessment report                           | Special Advisor Daniel Bachmann<br>Special Advisor Rikke Warming   |                                 |                   |
|             |  | Accreditation Officer Jon Alix Olsen   |                                 |                   |
| 10.30       | Review panel's private discussion  |  |                                 |                   |
| 10.45       | Meeting with representatives from the Senior Management Team   | Director of Analysis and Council<br>Management Rune Heiberg  |                                 |                   |
|             |  | Director of Operations, Professional,<br>Vocational and Maritime Institutions<br>Inge Enroth   |                                 |                   |
|             |  | Director of Operations, Universities<br>and Educational Institutions of Arts<br>and Culture<br>Steffen Westergård Andersen   |                                 |                   |
| 11.30       | Review panel's private discussion  |  |                                 |                   |
| 11.45       | Lunch  | Panel only   |                                 |                   |
| 12.45       | Meeting with accreditation<br>consultants in PEM and UNIK  | Senior Advisor Lars Pedersen<br>Senior Advisor Christel Sølvhjelm<br>Accreditation Officer Jacob Szpilman<br>Accreditation Officer<br>Mia Holm Andreasen<br>Accreditation Officer Ina Jakobine<br>Madsen |                                 |                   |

|             |  | Accreditation Officer Morten Kyhn   |                        |                   |
|-------------|--|---|------------------------|-------------------|
|             |  | Accreditation officer Morten Kynn   |                        |                   |
| 14.00       | Review panel's private discussion  |   |                        |                   |
| 14.15       | Meeting with the Council Secretariat and Management Secretariat                  | Chief Financial and IT Officer Mette<br>Berth   |                        |                   |
|             |  | Head of Section Nicki Brøchner<br>Nielsen   |                        |                   |
|             |  | Head of Communications Daniel<br>Larsen   |                        |                   |
|             |  | Special Advisor Line Sterregaard  |                        |                   |
| 15.00       | Review panel's private discussion  |   |                        |                   |
| 15.15       | Meeting with ministry representatives  | Head of Office<br>Jette Søgren Nielsen  |                        |                   |
|             |  | Head of Office<br>Bente Olsen   |                        |                   |
|             |  | Head of Section<br>Anders Bau Truelsen  |                        |                   |
|             |  | Head of Section<br>Camilla Badse  |                        |                   |
| 16.00-17.30 | Wrap-up meeting among panel<br>members and preparations for day<br>II            |   |                        |                   |
| 19.00       | Dinner   | Panel only.   |                        |                   |
|             |  | WEDNESDAY, 13.04.2016   |                        |                   |
| TIMING      | ТОРІС  | PERSONS FOR REVIEW  | ISSUES TO BE DISCUSSED | LEAD PANEL MEMBER |
| 8.30        | Review panel private meeting   |   |                        |                   |
| 9.00        | Meeting with representatives of<br>Academies of professional higher<br>education | EAAA: Director of Quality Anette<br>Bache   |                        |                   |
|             |  | KEA: Director of Quality and Human<br>Resources Miriam Skjalm & Quality<br>Consultant |                        |                   |
|             |  | Helle Korshøj Bendixen  |                        |                   |
|             |  | EA Kolding: Senior Lecturer Ole<br>Højgaard Pedersen                                  |                        |                   |
| 9.45        | Review panel's private discussion  |   |                        |                   |
| 10.00       | Meeting with representatives of the<br>University Colleges                       | UCSJ: Director of Quality Christian<br>Moldt  |                        |                   |

|       |   | VIA: Director of Quality Birgitte<br>Ashorn Quelle   |  |
|-------|---|--|--|
| 10.45 | Review panel's private discussion                     |  |  |
| 11.00 | Meeting with representatives of<br>Universities       | DTU: Senior Advisor Christa<br>Trandum & Head of Quality<br>Department Trine Eltang  |  |
|       |   | IT-U: Quality Coordinator Dorthe<br>Stadsgaard   |  |
|       |   | SDU: Project Manager<br>Nisrin Adel Hamad & Associate<br>Dean, Faculty of Humanities Lars<br>Grassmé Binderup                                |  |
| 11.45 | Review panel's private discussion                     |  |  |
| 12.00 | Lunch   | Panel only   |  |
| 13.00 | Meeting with representatives from the reviewers' pool | Prorector of research and<br>internationalisation and professor in<br>informatics at Høgskolen and<br>Akershus, Norway<br>Frode Eika Sandnes |  |
|       |   | Fil.dr. in paedagogics, former Dean at<br>Mälardalens högskola, Sweden, Elvy<br>Westlund   |  |
|       |   | Director Tue Christian Sanderhage,<br>Vestegnens HF & VUC  |  |
|       |   | Christoph Scheepers, Studieskolen<br>(The Study School on Languages),<br>Copenhagen  |  |
|       |   | Professor emeritus in Energy<br>Technology, The Royal Institute of<br>Technology, Sweden Gunnar<br>Svedberg                                  |  |
|       |   | Professor<br>Department of Leadership and<br>Organizational Behaviour, Norway<br>Anne Welle-Strand   |  |
|       |   | Former student and Senior Consultant   |  |

|             |                                      | at Ramboll Management Consulting      |                        |                   |
|-------------|--------------------------------------|---------------------------------------|------------------------|-------------------|
|             |                                      | Maria Juhler Larsen                   |                        |                   |
|             |                                      |                                       |                        |                   |
|             |                                      | Former student representative at the  |                        |                   |
|             |                                      | Board at Roskilde University Sidsel   |                        |                   |
|             |                                      | Gro Bang-Jensen                       |                        |                   |
| 13.45       | Review panel's private discussion    |                                       |                        |                   |
| 14.00       | Meeting with student                 | Andreas Birch Olsen                   |                        |                   |
|             | representatives                      | Anna Hjortkjær                        |                        |                   |
|             |                                      | Katrine Aagaard                       |                        |                   |
|             |                                      | Anna Sofie Vedersø                    |                        |                   |
|             |                                      | Annarita Ghosh Andersn                |                        |                   |
|             |                                      | Niels Tranberg                        |                        |                   |
|             |                                      | Jannik Johansen                       |                        |                   |
|             |                                      | Benedickte Fiskbæk                    |                        |                   |
|             |                                      | Heidi Klokker                         |                        |                   |
| 14.45       | Review panel's private discussion    |                                       |                        |                   |
| 15.00       | Meeting with employer                | The Confederation of Danish           |                        |                   |
|             | representatives                      | Industries Consultant Mette Nielsen   |                        |                   |
|             |                                      |                                       |                        |                   |
|             |                                      | The Danish Confederation of           |                        |                   |
|             |                                      | Professionals, Akademikerne,          |                        |                   |
|             |                                      | Senior Advisor                        |                        |                   |
|             |                                      | Birgit Bangskjær                      |                        |                   |
|             |                                      | binght bungskjær                      |                        |                   |
|             |                                      | The Federation of Employers in        |                        |                   |
|             |                                      | Finance,                              |                        |                   |
|             |                                      | Finanssektorens                       |                        |                   |
|             |                                      | arbejdsgiverforening                  |                        |                   |
| 15.45-17.30 | Wrap-up meeting among panel          | arbejusgiverrorening                  |                        |                   |
| 15.45-17.50 | members: preparation for day III     |                                       |                        |                   |
|             | and provisional conclusions          |                                       |                        |                   |
| 10.00       |                                      | Developed.                            |                        |                   |
| 19.00       | Dinner                               | Panel only<br>THURSDAY, 14.04.2016    |                        |                   |
| TIMUNIC     | TODIO                                |                                       |                        |                   |
| TIMING      | ТОРІС                                | PERSONS FOR REVIEW                    | ISSUES TO BE DISCUSSED | LEAD PANEL MEMBER |
| 8.30        | Meeting among panel members to       |                                       |                        |                   |
|             | agree on final issues to clarify     |                                       |                        |                   |
| 9.00        | Meeting with the Executive           | Executive Director Anette Dørge       |                        |                   |
|             | Director to clarify any pending      |                                       |                        |                   |
|             | issues                               |                                       |                        |                   |
| 9.45        | Private meeting among panel          |                                       |                        |                   |
|             | members to agree on the main         |                                       |                        |                   |
|             | findings                             |                                       |                        |                   |
| 11.15       | Final de-briefing meeting with staff | Executive Director Anette Dørge       |                        |                   |
|             | and management of the agency to      | _                                     |                        |                   |
|             | inform about preliminary findings    | Director of Operations, Professional, |                        |                   |
|             |                                      | Vocational and Maritime Institutions  |                        |                   |
|             |                                      |                                       | 1                      |                   |

|       |                            | Inge Enroth  |
|-------|----------------------------|--|
|       |                            | Director of Operations, Universities<br>and Educational Institutions of Arts<br>and Culture Steffen Westergård<br>Andersen |
|       |                            | Director of Analysis and Council<br>Management<br>Rune Heiberg   |
|       |                            | Special Advisor Daniel Bachmann  |
|       |                            | Special Advisor Rikke Warming  |
|       |                            | Accreditation Officer Jon Alix Olsen   |
| 11.45 | Lunch and end of programme |  |

#### **ANNEX 3: TERMS OF REFERENCE OF THE REVIEW**

External review of the Danish Accreditation Institution by the European Association for Quality Assurance in Higher Education (ENQA)

## Annex I: TERMS OF REFERENCE

November 2015

#### 1. Background and Context

The Danish Accreditation Institution is an independent agency founded by the Ministry of Science, Innovation and Higher Education. The agency's role is to support the Danish HEIs' own responsibility for IQA and quality improvement. The agency also serves to create public and international trust in the quality of Danish higher education. The primary assignment of the agency is to accredit HEIs as well as existing and new higher education programmes. Furthermore, the institution is producing summary reports describing and analysing the general findings of the accreditations as well as thematic reports on topical issues concerning higher education.

The recent law of July 2013 defines in a clearer manner than the previous law the structural division between the entities "The Accreditation Institution" and the "Accreditation Council".

The Accreditation Institution is tasked with all the steps of process leading up to, but not including the decision. The Accreditation Institution defines - in good understanding with the Accreditation Council and compliant with the law and by-laws - , the guidelines to be adhered to by the institutions in their documentation of good quality and quality assurance. The institution is undertaking the analyses of relevant documentation, leading to the development of an accreditation report, which after formal hearing at the HEI, is forwarded to the Accreditation Council for consideration.

The role of the Council is to take decisions of positive, conditional positive and rejection of accreditation, regarding individual programmes of higher education as well as HEIs. Decisions are based on the analysis reports and recommendations issued by the Accreditation Institution and the documentation from the HEIs.

The two entities constitute the system of accreditation in Denmark, but the focus of the ENQA review is the Danish Accreditation Institution.

The Danish Accreditation Institution has been a full member of ENQA since 2010 (at the time under the name of ACE Denmark – Accreditation Institution) and is applying for renewal of ENQA membership.

The Danish Accreditation Institution has been registered on EQAR since 2010 and is applying for renewal.

#### 2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent the Danish Accreditation Institution 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 The Danish Accreditation Institution should be reconfirmed and to EQAR to support the Danish Accreditation Institution's application to the register.

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

#### 2.1 Activities of the Danish Accreditation Institution within the scope of the ESG

In order for the Danish Accreditation Institution to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of the Danish Accreditation Institution 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 the Danish Accreditation Institution have to be addressed in the external review:

- Accreditation of all public higher education institutions
- Accreditation of all public higher education programmes
- Activities related to thematic analyses based on the insights gained in the accreditation processes as well as analysis of topical issues related to higher education

#### 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 the Danish Accreditation Institution including the preparation of a selfassessment report;
- A site visit by the review panel to the Danish Accreditation Institution;
- 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 five members: two quality assurance experts, an academic employed by a higher education institution, student member, and a labour market representative. One of the members will serve as the chair of the review panel, and another member as a review secretary. Two of the reviewers are nominated by the ENQA Board on the basis of proposals submitted to ENQA by the member national agencies. The third external reviewer is drawn from a nomination provided by the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE). The nomination of the student member comes from the European Students' Union (ESU).

In addition to the five members, 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 the Danish Accreditation Institution 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 Danish Accreditation Institution's review.

# **3.2** Self-assessment by the Danish Accreditation Institution, including the preparation of a self-assessment report

The Danish Accreditation Institution is responsible for the execution and organisation of its own selfassessment 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 the Danish Accreditation Institution 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 prescrutinise it before forwarding the report to the panel of experts. The purpose of the prescrutiny 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

Danish Accreditation Institution 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 the Danish Accreditation Institution at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by Danish Accreditation Institution in arriving in Copenhagen, Denmark.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and the Danish Accreditation Institution.

#### 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 the Danish Accreditation Institution within 11 weeks of the site visit for comment on factual accuracy. If Danish Accreditation Institution 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 Danish Accreditation Institution, finalise the document and submit it to Danish Accreditation Institution and 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.

Danish Accreditation Institution is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which the Danish Accreditation Institution 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

Danish Accreditation Institution 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. Danish Accreditation Institution 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 Danish Accreditation Institution. 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 Danish Accreditation Institution 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 Danish Accreditation Institution and ENQA and until it is approved by the Board the report may not be used or relied upon by Danish Accreditation Institution, the panel and any third party and may not be disclosed without the prior written consent of ENQA. Danish Accreditation Institution 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

| 4,500 EUR                  |
|----------------------------|
| 4,500 EUR                  |
| 6,000 EUR (2,000 EUR each) |
| 1,000 EUR (500 EUR each)   |
| 7,000 EUR                  |
| 1,400 EUR                  |
| 7,200 EUR                  |
| 1,600 EUR                  |
|                            |

Danish Accreditation Institution shall pay the following review related fees:

This gives a total indicative cost of 33,200.00 EUR VAT excl. for a review team of 5 members. In the case that the allowance for travel and subsistence expenses is exceeded, Danish Accreditation Institution 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 Danish Accreditation Institution 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                                | November 2015  |
|--|----------------|
| Appointment of review panel members                            | December 2015  |
| Self-assessment completed                                      | January 2016   |
| Pre-screening of SER by ENQA coordinator                       | February 2016  |
| Preparation of site visit schedule and indicative timetable    | March 2016     |
| Briefing of review panel members                               | March 2016     |
| Review panel site visit  | April 2016     |
| Draft of evaluation report and submitting it to ENQA           | June 2016      |
| coordinator for pre-screening                                  |                |
| Draft of evaluation report to Danish Accreditation Institution | July 2016      |
| Statement of Danish Accreditation Institution to review panel  | August 2016    |
| if necessary   |                |
| Submission of final report to ENQA                             | August 2016    |
| Consideration of the report by ENQA Board and response of      | September 2016 |
| Danish Accreditation Institution                               |                |
| Publication of the report                                      | September 2016 |
|  | •              |

### ANNEX 4: GLOSSARY

| AI   | Danish Accreditation Institution   |
|------|--|
| ENQA | European Association for Quality Assurance in Higher Education                             |
| EQAR | European Quality Assurance Register for Higher Education                                   |
| ESG  | Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015 |
| EVA  | Danish Evaluation Institute  |
| HE   | higher education   |
| HEI  | higher education institution   |
| PEM  | The Area for Professional, Vocational and Maritime Institutions within AI                  |
| QA   | quality assurance  |
| RUVU | The Advisory Committee to Assess the Range of Higher Study Programmes Offered              |
| SAR  | self-assessment report   |
| UNIK | The Area for Universities and Educational Institutions of Arts and Culture within AI       |

#### **ANNEX 5: DOCUMENTS TO SUPPORT THE REVIEW**

#### DOCUMENTS PROVIDED BY AI

- Self-assessment report (ENG)
- Act on the Accreditation of Institutions of Higher Education
- Follow-up 2012 and status 2016
- Framework for higher education institutions in Denmark
- Funding and Staff 2013 2015
- Guide to Accreditation of Existing Programme
- Guide to Accreditation of New Programme
- Guide to Institutional Accreditation
- Institutional accreditation report: Copenhagen Business School
- Memorandum on assessing quality assurance systems at institutions
- Mission and vision, August 2015
- Paneler i institutionsakkrediteringssystemet, 5 november 2013
- Procedure Handbook
- Supplement info sheet from the Danish Accreditation Institution: Supplementary Information requested by the ENQA secretariat, 9 February 2016
- SWOT Overview

#### OTHER REFERENCE SOURCES USED BY THE REVIEW PANEL

- Accreditation Council's web site
- Danish Accreditation Institution's web site
- Eurydice Eurybase Descriptions of National Education Systems and Policies
- EVA's web site
- Report of the External Review of the Accreditation Institution, August 2010
- www.retsinformation.dk

#### **ANNEX 6: CRITERIA USED IN AI ACCREDITATIONS**

#### The criteria in institutional accreditations<sup>65</sup>

Criterion I: Quality assurance policy and strategy

The institution has a formally-adopted quality assurance policy and strategy for strengthening and developing quality and relevance of the programmes and the local provision of programmes on an ongoing basis.

Criterion II: Quality management and organisation

Quality assurance is anchored at management level and is organised and performed in such a way as to promote development and the maintenance of an inclusive quality culture that supports and furthers the quality and relevance of programmes.

Criterion III: The programmes' knowledge base

The institution has a practice which ensures that programmes and teaching are always founded on a knowledge base that corresponds to that of programmes of the given type at the given level and provides a firm basis for achieving programme goals.

Criterion IV: Programme levels and content

The institution has a practice which ensures that programmes have an appropriate level, an academic content and an educational quality that supports students' learning and the achievement of programme goals.

Criterion V: Programme relevance

The institution has a practice which ensures that new and existing programmes reflect the needs of society and are continually adapted to social developments and the changing needs of the Danish labour market.

#### Criteria for accreditation of existing programmes<sup>66</sup>

Criterion I. Demand and relevance

The programme is relevant in relation to the demand on the labour market.

Criterion II. Knowledge base

The programme builds on the type of knowledge base required by the ministerial rules for the specific type of programme.

Criterion III. Goals for leaning outcomes

There is a connection between programme content and goals for learning outcomes.

Criterion IV. Organisation and completion

The organisation and practical completion of the programme supports the achievement of the goals for learning outcomes.

Criterion V. Internal quality assurance and development

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

#### Criteria for accreditation of new programmes<sup>6768</sup>

<sup>&</sup>lt;sup>65</sup> Guide to institutional accreditation

<sup>&</sup>lt;sup>66</sup> Guide to accreditation of existing programmes

Criterion II. Knowledge base

The programme builds on the type of knowledge base required by the ministerial rules for the specific type of programme.

Criterion III. Goals for leaning outcomes

There is a connection between programme content and goals for learning outcomes.

Criterion IV. Organisation and completion

The organisation and practical completion of the programme supports the achievement of the goals for learning outcomes.

Criterion V. Internal quality assurance and development

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

<sup>67</sup> Criterion 1 is not part of the AI accreditation process for new programmes

<sup>68</sup> Guide to accreditation of new programmes



THIS REPORT presents findings of the ENQA Agency Review of the Danish Accreditation Institution (AI) undertaken in 2015-2016.

