

Decision on the Substantive Change Report by Agency for Science and Higher Education (ASHE)

Register Committee
17 – 18 November 2025

Ref. RC48/C150

Ver. 1.0

Date 2025-12-15

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Decision of:	2025-11-18
Result:	Take note
Report received on:	2025-09-19
Agency registered since:	2011-08-01
Last external review report:	2022-03
Registration until:	2027-03-31
Absented themselves from decision-making:	Sandra Bezjak, Aleksandar Šušnjar (Secretariat)
Attachments:	1. Substantive Change Report, 2025-09-19

1. The Register Committee considered the Substantive Change Report of 2025-09-19.
2. The Register Committee took note of that ASHE has since its last review made the following changes
 - A) organisational changes related to:
 - changes in the agency's bodies
 - changes on the autonomy on independence of formal outcomes
 - B) changes to existing quality assurance activities
 - C) discontinuation of quality assurance activities
 - D) development of new activities outside the scope of the ESG
3. The Committee noted that these changes, reported by the agency, are all related to the latest legislative changes related to quality assurance in Croatia that were introduced in December 2022.

A) Organisational Changes

A1. Changes in the agency's bodies

4. The Register Committee noted that following legislative changes in Croatia, the agency's bodies have undergone changes in their structure and representation.
5. The Committee learned that with the latest legislative changes, the Complaints Committee¹, it is now composed of 7 members appointed

¹Complaint is understood as appeal, following the description under ESG 2.7.

and dismissed by the National Council, consisting of professors, legal experts and a full-time student.

6. **The Register Committee took note on the change of the structure of the Complaints Committee and expects that the next external review of the agency looks whether ASHE has improved its policies and processes and how they were affected by this change (under ESG 2.7).**
7. The Committee further learned that the structure of the Management Board – the agency’s main governing body – has changed significantly. Specifically, the board no longer includes student representative in its structure, a role that had been ensured prior to the legislative change.
8. **Given the severity of the change, by excluding one stakeholder group from the governance of the agency, the Register Committee concluded that ASHE remains to be partially compliant with ESG 3.1. The Committee expects the next review to investigate the reasons for this change and how stakeholder involvement in governance is now ensured. (under ESG 3.1).**

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A2. Changes on the autonomy on independence of formal outcomes

9. The Register Committee learned that following the legislative changes, ASHE received the autonomy to issue the final decision in all of its procedures and not only recommendations to the ministry as previously prescribed by the legislation.
10. The Register Committee welcomed the change that would ensure stronger autonomy of the agency in its decisions on formal outcomes.

B) Changes to existing quality assurance activities

11. The Register Committee learned that, following the legislative changes in Croatia, all external QA activities – excluding the European Approach of QA of Joint programmes – have been updated to improve operational activity.
12. The Committee understood that these revised procedures have been introduced in order to enhance alignment with the ESG, strengthen consistency with the Croatian Qualifications Framework (CROQF) and to ensure greater transparency and accountability in its decision making.
13. Based on the detailed mapping of the revised standards for each procedure against the ESG, the Register Committee has no prima facie concerns that the ESG are complied with.
14. **The Register Committee though expects the forthcoming review of the agency to fully analyse the implementation of these changes against ESG 2.1 – ESG 2.7.**

C) Discontinuation of external quality assurance activities

15. The Register Committee took note that following the legislative changes in Croatia, ASHE discontinued the following activities:

- Audit (of higher education institutions)
- Re-accreditation of part of the activity of higher education institutions (Re-accreditation of postgraduate university doctoral (PhD) study programmes)

16. Therefore, these two activities will be archived from the agency entry on EQAR and DEQAR.

D) Development of new activities outside the scope of the ESG

17. The Register Committee learned that ASHE was given the responsibility to evaluate the implementation and activities of Croatian higher education and scientific institutions that are receiving state funding. Considering that this activity are not focused on teaching and learning, the Committee concurs with ASHE that this activity is outside the scope of the ESG.

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EQAR Substantive Change Report

Agency #1	Agency for Science and Higher Education
Agency acronym	ASHE
Expiry date #1	31/03/2027
Contact #1	Mina Đorđević
Phone #1	
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Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	Yes
Description	<p>The Agency for Science and Higher Education is governed by the Management Board (MB) that has 9 members. The Government of the Republic of Croatia appoints 8 members (one member proposed by the National Council for Higher Education, Science and Technological Development, three members proposed by the Rectors' Conference of the Republic of Croatia, two members proposed by the Conference of Polytechnics of the Republic of Croatia, and two members proposed by the Ministry of Science and Education). The 9th member of the Management Board is a representative of Agency staff and is appointed and relieved of their duty by the workers' council of the Agency. The Accreditation Council is appointed based on the public call for applications and dismissed by the Agency Management Board. This body is composed of 13 members: six full professors or full professors with tenure, two scientific advisers or scientific advisers with tenure, two teachers</p>

elected to the position of professor of professional studies or professor of professional studies with tenure, one full-time student of university studies, one full-time student of professional studies, and one representative of the business sector.

The Complaints Committee is composed of seven members appointed and dismissed by the National Council from among full professors or full professors with tenure. At least two members of the Committee must be legal experts, one member must be a professor of professional studies and one member a full-time student.

The Follow-up Committee is composed of seven members appointed and dismissed by the Accreditation Council, and one of these members (the Committee Chair) is also a member of the Accreditation Council.

In addition to...

... the changes in new QA legislative framework, the Agency's organizational structure has been transformed (organigramme enclosed) according to the general legislative framework regulating the workplaces and salaries in the public sector in Croatia.

C. Changes in EQA activities

- 2. Substantive changes carried out to one or several existing external QA activities (e.g. changes to their methodology, criteria or procedures)
- 3. One or several existing activities were discontinued

Description new/changed

All external QA activities such as initial accreditation of programmes, initial accreditation of institutions and reaccreditation have been adjusted in accordance with the new law and improved in operational sense. The main change is related to the fact that the Agency currently

issues the final decision in external quality procedures, not just recommendations to the Minister as it was previously prescribed by the law. These changes are also reflected in QA procedures' documents issued after expert panel report - proposal of Accreditation Council/before Accreditation Council recommendation and Agency's decision/before Minister's decision. The revised procedures have been introduced in order to enhance alignment with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), to strengthen consistency with the Croatian Qualifications Framework (CROQF), and to ensure greater transparency and accountability in decision-making.

According to the new legal framework, the cross-border evaluation procedure has changed a scope - from study programme to the institutional level.

Finally, as Law on Higher Education and Scientific Activity enabled article 64 (enclosed) the introduction of the Evaluation of joint degrees according to European approach, ASHE adopted the Ordinance on the Implementation of Accreditation Procedure of Joint Studies of Domestic and/or Foreign Higher Education Institution(s) and Quality Standards in the Accreditation Procedure of Joint Study Programmes Offered by Croatian and Foreign Higher Education Institution(s). Consequently, after finishing a procedure with one of EQAR registered agencies, according to consortia's choice, Agency for...

... Science and Higher Education will issue a decision on recognition of other EQAR Agency's

decision.

2. Changed EQA activity

1	Initial accreditation of study programmes
2	Initial accreditation of higher education institutions
3	Re-accreditation of higher education institutions
4	Cross-border evaluation of institutions
5	Accreditation Procedure of Joint Study Programmes
ESG 2.1	<p>For all these procedures except European approach of QA of joint programmes the standards have been updated. In revision of standards it is specially taken care that they continued to be adjusted with ESG and we provide mapping against ESG part 1 attached. In reaccreditation procedure greater emphasis is placed on the evaluation of achieved learning outcomes and their correspondence with the intended CROQF level, thereby ensuring that reaccredited institutions demonstrate the actual attainment of knowledge, skills and competences by students. Secondly, evaluation criteria have been broadened to include not only legal compliance but also student-centred learning, teaching and assessment methods, internal quality assurance mechanisms, and the sustainability of resources. Thirdly, the procedure has incorporated open science indicators, thereby requiring institutions to demonstrate practices such as open access to research outputs, data management, and transparent dissemination of scientific knowledge. Fourthly, digitalisation has been embedded into the reaccreditation process both as an evaluation area—through assessing institutions' use of</p>

digital tools in teaching, learning and administration—and as a procedural improvement, through fully digitalised submission and review processes.

In initial accreditation the procedure of initial accreditation of HEIs all the programmes follows the same documents and approach, but there are certain adaptations of standards embedding the particularities of each mode of delivery/study programme level.

Although the procedure of initial accreditation of all the programmes follows the same documents and approach,...

... there are certain adaptations of standards embedding the particularities of providing:

- Initial accreditation of undergraduate, graduate, integrated, specialist and short-cycle study programmes - Internal quality assurance, Study programme, Teaching process and student support, Teaching and supervision infrastructure and resources.
- Initial accreditation of undergraduate, graduate, integrated, specialist and short-cycle online study programmes - Internal quality assurance, Study programme, Teaching process and student support, Teaching and supervision infrastructure and resources.
- Initial accreditation of doctoral studies (<https://www.azvo.hr/en/evaluation/initial-accreditation/initial-accreditation-of-doctoral-studies/>) - Internal quality assurance, Study programme, Teaching process and student support, Teaching and supervision infrastructure and resources.
- Initial accreditation of online doctoral studies - Internal quality assurance, Study programme, Teaching process and student support, Teaching

and supervision infrastructure and resources.

- Initial institutional accreditation evaluation criteria have been broadened to encompass not only legal compliance but also pedagogical approaches, student-centred learning, assessment methods, internal quality assurance mechanisms, and the sustainability of institutional resources.

•The re-accreditation of a higher education institution standards have been improved encompassing digitalization, better focus on student-centered learning and open science indicators.

The changes in all evaluation procedures encompass additional improvement and clarification of standards.

Cross-border...

... institutional accreditation - according to the changes of the law can be conducted only on the institutional level so the revised standards reflect that change.

Accreditation Procedure of Joint Study Programmes - new ordinance has been adapted that include possibility that after finishing a procedure with one of EQAR registered agencies, according to consortia's choice, Agency for Science and Higher Education will issue a decision on recognition of other EQAR Agency's decision.

ESG 2.2

In the revision of the methodologies for all these procedures the representatives of stakeholders have been included. Updated methodologies have been prepared in the Agency, adopted by the Accreditation Council and underwent public

debate. Following public debate, Accreditation Council adopted the final methodologies and they have been presented at the Rectors conference and Council of Universities of applied Sciences and workshops for HEIs have been organized.

Furthermore, the methodologies have been tested in pilot processes and based on the analysis, the report has been produced resulting in fine tuning of the methodologies.

ESG 2.3

1	https://www.azvo.hr/en/evaluation/initial-accreditation/initial-accreditation-of-studies/
2	https://www.azvo.hr/en/evaluation/initial-accreditation/initial-accreditation-of-higher-education-institutions/
3	https://www.azvo.hr/en/evaluation/re-accreditation/re-accreditation-of-higher-education-institutions/
4	https://www.azvo.hr/en/evaluation/cross-border-activities/
5	https://www.azvo.hr/en/evaluation/accreditation-of-joint-studies-by-domestic-and-foreign-higher-education-institution/

ESG 2.4

Same as before

ESG 2.5

Same as before

ESG 2.6

1	https://www.azvo.hr/en/evaluation/overview-of-evaluation-procedures/
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3. Discontinued EQA activity

1	Institutional Audit
2	Re-accreditation of part of the activity of higher

	education institutions (Re-accreditation of postgraduate university doctoral (PhD) study programmes)
Context	These QA activities has been discontinued by the Act on quality assurance in higher education in 2022.
D. Activity outside the scope of the ESG	Yes
Context	Given the funding of public higher education institutions model relies primarily on general state budget, new legal framework introduced the new system of financing HEIs and scientific institutions based on programme contracts. As the new activity, the law stipulates that ASHE evaluates the implementation and activities of Croatian higher education and scientific institutions for budget allocation in of this type funding. The agency will begin conducting this evaluation in 2026.
File #1	Quality_assurance_Act_ENG.pdf (194 KB)
File #2	ZVOZD_prijevod_engl.pdf (808 KB)
File #3	ASHE_Organogram_internal_relations.pdf (180 KB)
File #4	ASHE_standards_mapping.pdf (112 KB)
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