

ENQA TARGETED REVIEW

NORWEGIAN AGENCY FOR QUALITY ASSURANCE IN EDUCATION (NOKUT)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Norwegian Agency for Quality Assurance in Education (Nasjonalt organ for kvalitet i utdanningen, NOKUT) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG 2015) Part 2 and 3. The report is based on an ENQA targeted peer review, following the methodology described in the Guidelines for ENQA Targeted Reviews and considering the *Use and Interpretation of the ESG* by the EQAR's Register Committee. In addition to the agency and its stakeholders, the report is meant to provide information for the ENQA Board's decision on NOKUT's renewal of membership and to EQAR to support the agency's reapplication to the register.

The external targeted review was conducted from July 2022 to April 2023, with a site visit of the review panel in charge of the evaluation taking place between December 5 and 7, 2022.

NOKUT was established in 2002 as the agency responsible for external quality assurance of Norwegian higher education. It is a European Association for Quality Assurance in Higher Education (ENQA) member agency and has been listed in the European Quality Assurance Register for Higher Education (EQAR) since 2013. In its capacity of an independent expert body under the Ministry of Education and Research of Norway, the agency aims 'to contribute to society at large having confidence in Norwegian higher education and tertiary vocational education'¹. In their work, the dialogue and cooperation with students, educational institutions, and other stakeholders is strongly considered for achieving NOKUT's one liner: 'secure quality – provide trust'.

The agency performs a broad range of external quality assurance activities, varying from the level of study programmes to the level of institutions of higher education and tertiary vocational education. Based on the Terms of Reference for this targeted review, the panel has analysed the activities related to higher education following under the scope of ESG: institutional and study programme accreditation and supervision, periodic review of institutional quality assurance practices, evaluations of quality in education (the latter being a new activity implemented since the last ENQA evaluation).

The ESG specifically addressed in this targeted review are *2.1 Consideration of internal quality assurance*, *2.4 Peer-review experts*, *2.7 Complaints and appeals*, which were found partially compliant at the last EQAR Register Committee's renewal decision, and standards 2.1 to 2.7 for the new activity introduced, i.e., *Evaluations of quality in education*. On agency's request, *ESG 2.3 Implementing processes* was also considered for analysis by the panel (since, despite being found compliant by EQAR, it was found partially compliant by ENQA at its previous review). ESG 2.2 is particularly tackled as a selected enhancement area.

The panel considered the evidence given in the self-assessment report, additional evidence requested by the panel and provided by the agency (full list of additional documentation is in Annex 4) and performed an onsite site visit where meetings with a wide range of audiences were held. The panel thoroughly analysed and discussed all the evidence and concluded that NOKUT complies with the ESG as presented in the summary table below. Since the last ENQA review, the agency has made significant progress in relation to ESG 2.1, 2.3, 2.4 and 2.7, which were previously found partially compliant. At the same time, the panel was deeply impressed by the agency's willingness to step out from the regular external quality assurance procedure and to develop new, innovative ones, hence better serving the Norwegian higher education system to continuously develop. Continuing an open communication with stakeholders and strengthening their role in designing the methodologies, especially in setting the evaluation criteria for periodic reviews, as well as better exploiting the outcomes of the Evaluation of quality of education for making the periodic reviews slimmer - with

¹ <https://www.nokut.no/en/about-nokut/>

less administrative burden, could help NOKUT to perform reviews that contribute to enhancement and not just control of the Norwegian HEIs.

Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review ²	Compliance transferred from the last full review ³
2.1	Compliant	N/A
2.2	Compliant (for new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.3	Compliant	N/A
2.4	Compliant	N/A
2.5	Compliant (for new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.6	Compliant (for new QA activities only)	Fully compliant → Compliant (for QA activities reviewed during the previous full review only)
2.7	Compliant	N/A
3.1	Not included in the targeted review	Fully compliant → Compliant
3.2	Not included in the targeted review	Fully compliant → Compliant
3.3	Not included in the targeted review	Fully compliant → Compliant
3.4	Not included in the targeted review	Substantially compliant → Compliant
3.5	Not included in the targeted review	Fully compliant → Compliant
3.6	Not included in the targeted review	Fully compliant → Compliant
3.7	Not included in the targeted review	Fully compliant → Compliant

² Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark “for new or changed QA activities only” is added in brackets to the compliance assessment.

³ Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

INTRODUCTION

This report analyses the compliance of Norwegian Agency for Quality Assurance in Education (Nasjonalt organ for kvalitet i utdanningen, NOKUT) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted in 9 months (from July 2022 to April 2023) and should be read together with the external review report of the agency's last full review against the ESG.

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

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

NOKUT has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2013 (with its predecessor being a member of ENQA since 2008) and registered on the European Quality Assurance Register for Higher Education (EQAR) since 2013 as well. As NOKUT has undergone three successful reviews against the ESG Part 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes⁴ during the past five years while at the same time further strengthening the enhancement part of the review.

This targeted review and the findings of the panel are used for renewal of both NOKUT's ENQA membership and its listing on EQAR.

SCOPE OF THE REVIEW

From the beginning of the review process, the panel took note of the Terms of Reference (ToR) set for the scope of the review. The following external quality assurance activities conducted by NOKUT are deemed to be within the scope:

- Institutional accreditation;
- Study programme accreditation;
- Periodic review of institutional quality assurance practices;
- Supervision of the institutional accreditation;
- Supervision of the programme accreditation;
- Evaluation of quality in education.

The following activities of NOKUT are outside the scope of the ESG:

- Accreditation of tertiary vocational study programmes;
- Accreditation of tertiary vocational subject areas;

⁴ e.g. organisational changes, the launch of new external QA activities.

- Periodic review of tertiary vocational institutional quality assurance practices;
- Supervision of tertiary vocational study programmes and subject areas;
- Recognition of foreign education;
- Regulatory and economic tasks;
- Implementation of the National Student Survey;
- Implementation of the National Teacher Survey;
- National assessment examinations.

This report also deals with each of the focus areas below (ToR, page 2):

1. Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
 - a. ESG 2.1 due to the insufficient coverage of ESG 1.3, 1.4 and 1.5 in the activity "Institutional quality assurance audit";
 - b. ESG 2.4 due to the unsystematic inclusion of students in the review panels in the activity "Initial programme accreditation";
 - c. ESG 2.7 due to the lack of clarity of the complaints procedure.
2. Standards 2.1 to 2.7 for the following activities: Evaluation of quality in education.
3. ESG 2.1 Consideration of internal quality assurance.
4. ESG 2.3 Implementing processes.
5. Selected enhancement area: ESG 2.2 (Designing methodologies fit for purpose).

For the ToR, please see Annex 2. For the glossary of terms used, please see Annex 3.

MAIN FINDINGS OF THE 2018 REVIEW

The previous ENQA coordinated review took place in 2018 and its findings were also used for NOKUT's listing on EQAR. With respect to the ESG (2015) EQAR found NOKUT compliant with all the standards except for ESG 2.1 (Consideration of internal quality assurance), ESG 2.4 (Peer-review experts) and ESG 2.7 (Complaints and appeals), where the agency was found partially compliant. These are further elaborated in the section of this report presenting findings of NOKUT compliance with ESG (starting at page 11). EQAR concluded that, overall, NOKUT continued to comply substantially with the ESG.

The 2018 review also listed a couple of points of attention as recommendations to NOKUT on the specific standards:

- to implement the plans for follow-up in the 3rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented; to consider introducing a follow-up procedure for programme accreditations. (ESG 2.3);
- to complete and publish the two meta-analyses of institutional audits and programme accreditations and implement its plan to publish regular meta-evaluations of their own work. In addition to the meta-evaluations, it would be of specific interest to HEIs to publish summarised findings of NOKUT's evaluations also as separate reports, and not only as part of wider analytical exercises. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3rd cycle of audits (ESG 3.4).

After the external review in 2018, NOKUT was granted ENQA membership for five years and inclusion on the EQAR Register until 30 June 2023.

In 2020, the agency submitted to ENQA a follow-up report on recommendations in the panel report, which was approved by the ENQA Board.

In 2022, the agency submitted to EQAR a substantive change report for introducing a new external quality assurance activity: *Evaluation of quality in education*⁵. The Register Committee accepted this activity and expressed the expectation of it being analysed in full as part of the current review.

The review panel therefore acknowledges, in this report, the status of the ESG standards that were found to be in compliance with the ESG during the last full review, while at the same time addressing EQAR's remarks.

REVIEW PROCESS

The 2022 external targeted review of NOKUT was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of NOKUT was appointed by ENQA and composed of the following members:

- Karin Järplid (Chair), Head of Department of QA, The Swedish Higher Education Authority, Sweden, Chair, QA professional - ENQA nominee;
- Simona Lache (Secretary), Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania, academic - EUA nominee;
- Pegi Pavletić, PhD Student in Pharmaceutical, Nutraceutical and Food sciences, University of Camerino, Italy, panel member, student - ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool.

Mr. Goran Dakovic acted as the review coordinator.

NOKUT produced a self-assessment report (SAR) that provided the basis for the review panel's work. Panel members received the SAR from NOKUT on 17 September 2022 and immediately began to evaluate its contents according to the provisions of the ToR. The panel's introductory meeting with ENQA coordinator and EQAR's representative (who joined in only at the beginning of the meeting) took place online, on 6 October 2022, and was followed by several meetings of the panel: kick-off session - online, on 3 November 2022; panel's internal meeting - online, on 22 November 2022; clarification meeting with the agency's resource person - online, on 22 November 2022, to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency).

One week prior to the site-visit, the chair of the panel had to be replaced for the period of the actual site-visit to NOKUT in Oslo only, due to personal reasons. Consequently, Mr. Ulf Hedbjörk, QA professional from the Swedish Higher Education Authority with a deep understanding of the Norwegian higher education system and knowledge of Norwegian language, stepped in the position of chair of the panel during the site-visit. This was approved by the ENQA Agency Review Committee in advance of the site visit. Ms. Karin Järplid remained the chair of the panel contributing to the site-visit preparation and post site-visit work. The agency was informed about the situation and agreed to the new arrangements. The review panel's pre-visit meeting and preparations for day 1 were organised online on 2nd December 2022 and was continued in person for those present in Oslo, before the site-visit. The panel conducted an onsite visit to NOKUT from 5 to 7 December

⁵ <https://www.nokut.no/en/quality-enhancement/evaluations-of-quality-in-education/>

2022, where it further examined both the claims made in the self-assessment report and cross-checked other evidence as provided by the agency. The panel was also able to clarify any points at issue. The working language was English during the entire process of interaction with the agency, and no translation was needed. Finally, the review panel produced the external review report based on the following sources: the SAR, additional information provided by the agency upon the panel's request, information collected during the site visit, and other evidence (e.g., website, previous external evaluation reports). In doing so, the panel provided an opportunity for NOKUT to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and persons it wished to consult throughout the review process.

Self-assessment report

The agency mentions that the SAR was produced based on input from internal workshops, and from the NOKUT Board and that the Board discussed the SWOT analysis in-depth at their seminar in June 2022 and approved the report formally in August 2022. The self-evaluation process has been conducted for about eight months, by a team consisting of senior advisors from different departments of the agency and coordinated by the Director of the Department for Evaluation and Analysis. During interviews it has been stated several times how important and useful the agency's staff found this process to be for NOKUT's further development.

The SAR presented changes in the agency since 2018, when the last full review took place, introduced the new external evaluation activity, and tackled the developments mainly in the focus areas related to the compliance with ESG part 2 (i.e., for all the activities and ESG 2.2, 2.5 and 2.6 for the new activity "evaluations of quality in education"). The SAR also included an extensive reference to ESG 2.2 (Designing methodologies fit for purpose), selected as enhancement area in the targeted review, as well as to ESG 2.3, with which NOKUT was found to be partially compliant by ENQA only in 2018, but the agency considered it relevant for a review by the panel.

The review panel found the SAR to be well structured, informative and reflective, and the findings allowed the agency to identify its strengths and weaknesses, current challenges, and areas for further development. The panel read it in conjunction with the documents of the previous ENQA full review (SAR, ERR, etc.) and with other additional material requested from the agency, in order to get a complete image and understanding of NOKUT and its operations.

Site visit

The site visit was conducted in person from 5 to 7 December 2022, and prior to that several pre-visit meetings took place, as presented in the visit schedule (Annex I). The visit schedule was agreed upon with the agency. The panel found the visit to be well planned and organised, thus the review panel was able to meet and interview all key internal and external stakeholders of the agency, including the NOKUT's CEO, the Chair of the Board, representatives of the Senior Management Team, agency staff on the self-selected enhancement area, staff in charge of quality assurance of study programmes and institutions, staff in charge of evaluations of quality in education, administrative staff, representatives of the Ministry (including the Directorate for Higher Education and Skills - "HK-Dir"), heads and QA officers from Higher Education Institutions (HEIs), members of the experts' pool, students involved in external QA activities, and other stakeholders. The discussions in the meetings were triangulated with the self-assessment report and the documentary evidence as provided by the agency in advance, which altogether allowed the panel to come to conclusions and judgements on the compliance as presented in this report. A particular emphasis was given to the discussions on the self-selected enhancement area, where the review panel learned

about and openly discussed the agency's vision and steps taken forward to enhance the methodologies fit for purpose.

The panel wishes to convey its thanks to all involved parties that dedicated their time to meet with and help the panel to better understand the activities of NOKUT and the context within which it operates. The frankness of communication and the openness shown by the interviewees are highly appreciated.

The staff of the agency showed commitment during the entire review process and provided assistance to the panel regarding all matters. At the end of the site visit, the panel held a final internal meeting to discuss and agree on the preliminary conclusions on the level of compliance of NOKUT on each of the ESG standards under the scope of the targeted review. At the same time, the panel discussed the main findings on ESG 2.2 and formulated suggestions for enhancement accordingly. All of this was reported orally to the agency during the final debriefing session. The panel secretary drafted the report in cooperation with the rest of the panel. The draft report was submitted to NOKUT for fact checking on the 1st of March 2023 and then finalised and sent to ENQA by the end of March 2023.

CHANGES WITHIN THE AGENCY

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

The higher education system in Norway has undergone a structural reform in 2015, when several universities and university colleges merged into bigger institutions. Consequently, the number of higher education institutions (HEI) in 2022 dropped to 48, compared with 79 in 2012. Currently, the higher education landscape is formed by ten universities, nine specialised university institutions, 13 university colleges, and 16 university colleges with accredited study programmes. There is a strong variation among HEIs in terms of number of students and staff as well, partly due to Norway's topography, which creates a constant challenge especially for the merged institutions with multiple campuses across the country. However, one needs to note that securing access to higher education across the whole country is presented as one of the political goals.

The structural reform has also impacted the quality assurance of higher education, as NOKUT informed the review panel of the Government's decision to have all university colleges without institutional accreditation accredited by 2025, in order to be eligible to receive public funding. During the clarification meeting with the resource person, the panel learned that 16 institutions out of 48 do not have institutional accreditation. NOKUT expects to receive less than 6 applications for accreditation in the near future, which is considered to be reasonable for the agency's resources.

NOKUTS'S ORGANISATION/STRUCTURE

The organisation chart, the description of the functions and the composition of each of the bodies, are published on the agency's website, <https://www.nokut.no/en/about-nokut/organisation-chart>. It confirms no major changes in NOKUT's structure since the previous review up until now. As from the 1st of January 2023, NOKUT's Department of foreign education was transferred to The Directorate for Higher Education and Skills (Norwegian acronym "HK-Dir") – established in 2021 under the Ministry of Education and Research. This transfer follows the Norwegian Parliament's decision to remove recognition of foreign education from NOKUT's mandate (see the amendment to the University and University Colleges Act, <https://lovdata.no/dokument/LTI/lov/2022-06-17-68>). Since there has always been a separation between recognition of foreign education and the other activities of NOKUT, this change is not expected to affect in any way the core quality assurance activities of the agency (including the external quality assurance activities within the scope of ESG); it will only exclude the recognition-related activities from NOKUT and assign them to Hk-Dir. As the

review panel learned from the discussions with NOKUT staff: In the long run, this is rather seen as a strength for the agency, giving the opportunity to focus on its core activities.

NOKUT currently operates according to the strategy developed for the period 2020-2025. This strategy had to be updated to reflect the structural and organisational changes and to address the need for redefining and adapting NOKUT's role in the sector. The updated version was finalised and approved at the board meeting in December 2022.

NOKUT'S FUNDING

There have been no significant changes in the funding of the agency since the previous full review in 2018. Since the SAR does not provide information on this subject, the review panel relies on the 2018 ERR and the site visit in 2023 when stating that NOKUT is fully funded by the Norwegian state budget, as determined and supervised by the Ministry of Education and Research. Along with the transfer of the Department of foreign education to HK-Dir, NOKUT had to split also the finances with HK-Dir, which is considered challenging by the agency, as the panel learned during the site visit. On the other hand, the CEO of the agency made it very clear during the interview that NOKUT is prepared to face this challenge by prioritising its agenda and putting first the activities required by law and the EQA activities compliant with ESG.

NOKUT'S FUNCTIONS, ACTIVITIES, PROCEDURES

Except for the new external quality assurance (EQA) activity introduced since the previous ENQA review, the agency's functions, activities, and procedures are being implemented as described in the 2018 ENQA report.

The new activity within the scope of the ESG is "Evaluation of quality in education". The rationale for introducing it lies back in 2018, when NOKUT finalised the "Joint evaluation of research and education"- an EQA activity described in the last full review but concluded after the ENQA review panel had finalised their review of NOKUT. The experience gained with the "Joint evaluation of research and education" opened the perspective for NOKUT to work with institutions in another way, to achieve a balance between quality assurance and quality enhancement. Consequently, the "Evaluation of quality in education" has been developed, with a stronger focus on enhancement rather than control, following a methodology in compliance with the ESG. As described by NOKUT, this EQA activity consists of national, comparative evaluations, both summative and formative, concluded always with recommendations for further development, not with sanctions. All in all, the activity has been developed to broaden the agency's tools to achieve/ secure quality enhancement at HEIs' level.

Up to now one pilot evaluation has been completed, ("Evaluation of Integrated secondary teacher education"), one is under development ("Evaluation of quality in primary and lower secondary teacher education") and a third one is planned to start in the following period ("Evaluation of medical education").

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

ESG PART 3: QUALITY ASSURANCE AGENCIES

The present targeted review does not include the ESG Part 3 standards, as the EQAR Register Committee found NOKUT compliant with ESG 3.1-3.7. The compliance is therefore transferred to this review.

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 I of the ESG.

2018 review recommendation:

ENQA Agency Review Report: none

EQAR Register Committee decision: The Committee considered that NOKUT only partially complies with the standard due to the insufficient coverage of ESG 1.3, 1.4 and 1.5 in the activity “Institutional quality assurance audit” (i.e., Periodic review of institutional quality assurance practices).

Evidence

NOKUT has been performing EQA activities since 2003, as presented in the SAR. Since the Act of 1 April 2005, relating to Universities and University Colleges, entered into force, the agency has been operating in accordance with section 3-1 of the respective law. Over the years a high degree of trust in the Norwegian higher education system has been developed. Many higher education institutions have self-accrediting rights, and more are to come since the Government requires that university colleges are accredited by 2025 in order to be eligible to receive public funding. The panel found all the EQA activities within the scope of ESG to be described in the supporting documents associated with each procedure, and accessible on the agency website. In the agency’s reviewers’ opinion, as presented during the site visit interviews to the panel, NOKUT’s criteria were in compliance with ESG part I, since they were very well formulated and clearly explained within the seminars organised for the agency’s evaluation panels.

The panel notes that while the methodologies for Institutional accreditation and supervision, Study programme accreditation and supervision and Periodic review of institutional quality assurance practices follow the regulations of the national legislation, Evaluation of quality in education is an activity that is conducted following methodologies tailored on the theme of each evaluation; every methodology is co-created by NOKUT and higher education institutions involved in the evaluation, through special meetings and rounds of discussions organised for this aim.

The SAR describes (page 19) how standards of ESG Part I are covered within the agency’s EQA activities. This information is synthetically presented in the table below.

Table I. Compliance of the NOKUT’s EQA activities with the ESG part I⁶

ESG Part 1 standards	Institutional level EQA		Programme level EQA	
	Periodic reviews	Institutional accreditation and supervision	Programme accreditation and supervision	Evaluations of quality in education
1.1 Policy for quality assurance		*		
1.2 Design and approval of programmes		*		
1.3 Student-centred learning, teaching and assessment		*		
1.4 Student admission, progression, recognition and certification				
1.5 Teaching staff				
1.6 Learning resources and student support	*			
1.7 Information management		*	o	
1.8 Public information		*		
1.9 Ongoing monitoring and periodic review of programmes		*	o	
1.10 Cyclical external quality assurance		*	o	o

In the previous review there was insufficient coverage of ESG 1.3, 1.4 and 1.5 within the Periodic review of institutional quality assurance practices. NOKUT acknowledges, in the SAR, the importance of assuring that “the periodic reviews *alone* cover as many standards as possible from ESG Part I, since these reviews are cyclical and applied to all HEIs every 6–8 years”. The panel therefore was able to read about how this issue had been addressed in sections 4-1(3) and section 2-2(5) of NOKUT’s regulations, as well as in other documents issued by the agency: the white paper called “Quality Areas for Study Programmes in Higher Education” and the knowledge-based quality assurance and enhancement methodology. During the different interviews with the agency’s leadership and staff, the panel learned that in this way NOKUT aimed at achieving a balance between quality control and quality enhancement at institutional level, which was very much depending on the institution under evaluation. Periodic reviews have changed over the rounds: while in the 1st round the focus was on the institutions to have IQA systems in place, in the 2nd round more emphasis was put on seeing if and how these IQA systems function. This approach continues to be applied, as part of contributing to further enhancement of HEIs IQA and the effectiveness of these systems.

⁶ According to the SAR, “the green columns indicate that the EQA activity *directly* checks a standard against Part I of ESG, while the blue columns marked with a star indicate that the EQA activity *indirectly* checks the standard. Columns marked with an “o” show no connection between the activity and the ESG standards. The stars and the ‘o’s are included for readability in addition to the colours”.

The HEIs acknowledge NOKUT's great authority, high reputation, and the strive to balance on accountability and development. They also recognize its independence and, thereby, they exhibit high trust toward it. At the same time, the Ministry explained the important role of NOKUT, as an independent actor, in the higher education system in Norway. The Ministry also stressed the importance that quality assurance of higher education institutions to be adapted to the standards given at the European level and the graduates from Norway to have an international reference. In this sense, it very much supports NOKUT to stay part of ENQA and EQAR.

Analysis

The panel identified no changes in regard to ESG 2.1 since the last review. The core activities of NOKUT are well-established and functioning, in terms of the internal QA assessment of higher education institutions, as it has been confirmed by all the stakeholders the panel spoke with. The agency could, however, in the panel's view increase the visibility of its 'trust-based' policy of work, for example by providing an English version of their national legislation on QA and QA procedures, which could, both, facilitate enhancing the 'international anchoring' NOKUT aims at, and inspire other national QA agencies in their work.

Since its re-organisation, the agency has been able to focus on the EQA activities within the scope of ESG; at the same time, the review panel acknowledges that NOKUT has been doing reviews of HEIs for quite some time and that the scope and focus need to vary over time depending on the maturity of the HEIs, thereby avoiding repeating the same evaluation at different cycles. The institution's own responsibility for assuring quality and its systematic work in constant improvement and securing the effectiveness of their internal quality assurance processes is stressed in documentation provided to the panel. The panel explored the compliance of all NOKUT's EQA activities with the ESG part I, with particular focus on the Periodic review of institutional quality assurance practices (regarding ESG 1.3, 1.4 and 1.5 found as insufficiently covered in 2018) and the new activity introduced since the previous full review: the Evaluations of quality in education.

With reference to the progress made for covering ESG 1.3, 1.4, and 1.5 in the Periodic review procedure, according to the SAR:

ESG 1.3 Student-centred learning, teaching and assessment is monitored under section 4-1(3) of NOKUT's regulations, which states: "Institutions should have procedures in place for systematically assuring that all study programmes comply with the requirements set out in sections 3-1 to 3-3 of the Regulations Concerning Quality Assurance and Quality Development in Higher Education and Tertiary Vocational Education (ministerial regulations) and chapter 2 of this regulation" (NOKUT translation). According to Chapter 2 "teaching, learning and assessment methods should be adapted to the learning outcomes, and that the institutions must facilitate student-centred learning processes (section 2-2(5))".

ESG 1.4 Student admission, progression, recognition and certification. The criterion is addressed both through the HEIs' internal regulations and in different national regulations. In addition, NOKUT has recently started monitoring numbers for admission and progression through its knowledge-based quality assurance and enhancement-methodology (as stated in the SAR) and is able to initiate ad-hoc supervision or evaluation whenever potential quality failures are identified. The standard is also approached by the white paper called "Quality Areas for Study Programmes in Higher Education" - a document created by NOKUT for institutional enhancement.

ESG 1.5 Teaching staff is partly monitored under section 4-1(3) and Chapter 2 of NOKUT's regulations, i.e., by ensuring that a study programme should benefit of an adequate number of teaching staff, that the teaching staff have relevant competence and pedagogical skills, that they conduct research and are actively engaged in relevant networks. In addition, NOKUT has recently started mon-

monitoring compliance with respect to the teaching staff through its knowledge-based quality assurance and enhancement-methodology (as stated in the SAR) and is able to initiate ad-hoc supervision or evaluation whenever potential quality failures are identified. The part concerning fair and transparent *recruitment* processes is addressed through institutional compliance with Norwegian legislation and institutions' internal regulations. The part concerning fair and transparent processes for the *development* of staff is monitored both under section 4-1(3) as mentioned above and section 4-1(2), which focuses on whether the institution promotes quality culture(s).

Regarding the new activity, Evaluation of quality in education, there is no general set of criteria developed, as for each evaluation mission methodology and criteria are chosen to entirely fit the scope and focus of the respective procedure. This process is conducted in cooperation with the HEIs involved in the evaluation, thereby aiming at moving from quality control to quality enhancement. The support offered to institutions to develop and enhance the internal quality assurance systems is one of the declared goals of this new activity and one of the reasons for its implementation. As SAR describes, in doing this, the Evaluation of quality in education looks at how institutions “develop a quality culture in education, in which all internal stakeholders engage in quality assurance and assume responsibility for working with the quality of their study programmes (ESG 1.1)” and how study programmes are designed and approved (ESG 1.2). Institutions are requested to provide information depending on the theme of the evaluation mission, on student admission and drop-out (1.4 and 1.7), on staff and student experiences of research-based teaching (1.3 and 1.5) and student support activities (1.6), and on employer and graduate experiences of the programme learning outcomes (1.7 and 1.9). All in all, stakeholders consider this EQA activity relevant and very important for getting a clear view on the internal quality assurance systems in HEIs, given the Norwegian context with a lot of self-accrediting institutions.

The panel found the references provided by the agency are largely supported by the evidence found in specific documentation (legislation, methodologies and other documents issued by the agency, external review reports) and widely confirmed by the interviewees (Ministry, HEIs and experts from the reviewers' pool).

Following the presented above, it is the view of this panel that the agency's EQA activities are aligned with ESG 2.1; from all the documents seen and discussions held during the site visit, it can be drawn the conclusion that the effectiveness of the internal quality assurance processes within institutions is rigorously considered and evaluated in a meaningful manner.

The evaluation criteria of all procedures effectively translate the standards of ESG Part I (Table 1); based on its meetings with stakeholders, it is clear to the panel that the agency's work has contributed to the development of internal quality assurance in the Norwegian HEIs.

Panel commendation

1. The panel commends the agency for its overall dedication on contributing to the HEIs further enhancement and effectiveness of their internal quality assurance processes, giving NOKUT a strong position as a well-respected agency on a national level.

Panel suggestions for further improvement

1. The panel suggests the agency provide an English translation of their national legislation on QA procedures, to make their work more visible and easily understood from an international perspective, especially in terms of the agency's 'trust-based' policy of work. This could help other countries follow their example or understand their way of working.

Panel conclusion: 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.

2018 review recommendation: none

Evidence

The EQA activities of NOKUT are accompanied by well-defined methodologies, clearly presented on the agency's website. The review panel was able to learn about NOKUT's constant preoccupation for continuous development of methodologies and its engagement internationally with other QAA agencies to achieve this. A research report from NIFU was also commissioned for this purpose by the agency, in 2020, looking at innovative practices in QA of HE. The latest separation of tasks between NOKUT and HK-Dir has led to more focus on the ESG compliant activities for NOKUT. During the interviews with the agency's leadership and staff the panel was briefed about the ongoing dialogue carried on with HEIs in order to build a trust-based relationship and to design methodologies fit for purpose. In their view, institutions still see NOKUT as a primarily control organisation. However, NOKUTs' goal is to design the methodology in close relation with HEIs in order to help them even more to enhance quality and to encourage them towards development, not only compliance.

During interviews with agency staff and HEIs representatives, the panel learned that there is an ongoing dialogue between NOKUT and HEIs to make HEIs understand the criteria and how to fulfil them. The agency seems to be aware that its role is very much depending on the institution: for the new/ young ones, they have to provide more control; for the mature institutions NOKUT would rather move to an enhancement-based approach (while including elements of accountability) rather than performing control. On the other hand, some of the EQA activities, for example study programme accreditation or institutional accreditation, need to assess the fulfilment of legal criteria, therefore the weight is more toward accountability. The agency's challenge is about ensuring the balance between the framework of conditions and criteria (including the ones set by legislation) and the enhancement-driven approach, so as to maximize the usefulness of the process for the institution. This will be further discussed in the section of this report specially dedicated to the enhancement areas.

All the stakeholders the panel spoke with confirmed the efforts NOKUT makes for carrying on dialog and the agency's preoccupation to continuously improve its EQA methodologies.

The new activity, Evaluation of quality in education, is designed following the ESG and consists of evaluations with special focus on different themes either chosen by NOKUT or proposed by the Ministry of Education and Research. As explained in the SAR (page 12), they incorporate a set of study programmes, usually belonging to a particular subject area, from different institutions. The procedure is both informative – due to the comparative approach, HEIs, the Ministry and other relevant stakeholders are provided with information about the quality of learning and teaching at the programme level on a national scale, and formative – facilitating quality enhancement of HEIs through recommendations formulated by reviewers and exchange of knowledge and experiences across institutions.

Each procedure is governed by its own methodology, co-created by NOKUT in collaboration with a wide range of stakeholders: HEIs involved in the evaluation process, experts from reviewers' pool, professional associations from the sector, students. The methodological design takes into account five key issues (SAR, page 13): 1- the composition of the expert panel; 2- evaluation questions and criteria; 3- the design of the self-assessment, by considering institutions' workload and costs involved; 4- the incorporation of seminars and other events to facilitate reflection and knowledge exchange; 5- the format of the evaluation follow-up. The pilot evaluation has been well received by HEIs and, although the entire procedure lasts for two years, it is not considered too long by the involved institutions. HEIs appreciate the process as such, not just the final report, considering it as a part of the learning experience towards developing the quality culture.

Analysis

The review panel commends NOKUT for its constant preoccupation to design and review the methodologies in order to keep them fit for purpose, with the involvement of a wide range of stakeholders, ultimately aiming at reaching the perfect balance between accountability/ quality control and development/ quality enhancement.

The panel sees the new EQA activity, Evaluation of quality in education, as an example of seeking new developments of methodologies. It allows NOKUT to dig deeper into a selected area of evaluation, hence being more fitted for purpose by trying to work with institutions in another way and to make them see better the approach to enhancement, on one hand, and getting a broad picture of the quality of HEIs in a specific sector, on the other hand.

The panel found clear evidence that NOKUT has established a good collaboration with all stakeholders during the Evaluation of quality in education, and this type of assessment has been well-received by institutions. Broad stakeholder involvement was presented to the panel, and even though many respondents were not directly involved in this type of evaluations, they knew of it, which is a good sign.

The panel values the flexible approach of co-creating methodologies tailored to each evaluation mission, at the same time believing this could be one of the key elements to ensure trust in the Norwegian society with regard to education and to stimulate dialogue between different stakeholders (e.g., QA agency – HEIs, teachers – students, etc.).

Following this, it is clear to the panel that NOKUT is respected by all the different stakeholders when it comes to their role in quality assurance, and that the recent orientation toward quality enhancement, through the Evaluation of quality in education, has been well received. However, stakeholders' complexity needs to be taken into consideration when addressing quality enhancement, as the views might be different from different stakeholders' perspectives.

Even though the evaluation procedures last for two years in total, they are considered 'fit for purpose', as the site visit interviews showed, since this timeline involves the entire documentation preparation, as well as site visit preparation, so the assessment itself lasts less time. However, stakeholders note that responsiveness of the agency to HEIs' questions on this subject during the assessment needs to be improved. Another area of improvement would be for NOKUT to, in cooperation with HEIs, further develop the use of digital tools to share data more directly in order to reduce the administrative burden on institutions.

Panel commendations

2. The review panel commends the agency for its constant preoccupation to design and review the methodologies in order to keep them fit for purpose, and for its remarkable achievements related to the new activity, Evaluation of quality in education.

Panel recommendations

- I. The panel recommends the agency to work with the institutions to develop a digital system for assessment documentation collection, accessibility, and analysis, as the current procedures create an administrative burden.

Panel suggestions for further improvement

See section on 'Enhancement areas'.

Panel conclusion: 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

2018 review recommendation

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

EQAR Register Committee decision: no additional notes.

Evidence

The previous ENQA review found NOKUT to be in partial compliance with this standard, due to the lack of consistent follow-up of periodic reviews and study programme accreditations. The EQAR Register Committee did not concur with the ENQA review panel's conclusion, considering NOKUT in compliance with the standard. Although not requested to be tackled within the targeted review, the agency expressed the interest of including ESG 2.3 in the current review, as they consider it relevant to get an external view on the developments taken since the last ENQA review. At the same time, the findings are expected to be interesting for NOKUT's external stakeholders.

The panel learned from the interviews with HEIs representatives and experts that all the EQA activities are reliable, useful, pre-defined, implemented consistently and published; they consist of a self-assessment and a site-visit, being concluded with an external review report. Nothing has changed in this regard at the agency and the information in the 2018 report still stands.

The SAR extensively describes the follow-up procedures implemented since 2018. During the interviews with the agency's staff and HEIs the panel was able to confirm the information read in the SAR.

In the periodic reviews of institutional quality assurance practises a three-step follow-up procedure has been introduced by NOKUT: the 1st step is more about accountability: the agency looks at the

requirements that haven't been met initially. That step can last from 2-3 months up to one year, depending on how long it will take to implement improvements. The 2nd step refers more to quality enhancement: although the recommendations given by the expert panel are not mandatory, the institutions are interested to receive them and usually they make efforts to comply with them. The 3rd step is focused on development and consists of follow-up seminars organised two-three years after issuing the Board's decision. Their content is designed by NOKUT in cooperation with the institutions, to ensure full impact and usefulness for further development of HEIs.

In accreditation of study programmes, the follow-up is applied in two steps: the accountability step (compulsory, looking at the issues to be fixed following the initial evaluation) and the enhancement step (looking at recommendations/ further suggestions and how they are addressed by the institutions). Regarding follow-up on accredited study programmes, the panel learned about NOKUT's knowledge-based quality assurance and enhancement – where the agency identifies possible risks of poor quality in study programmes, institutions, or even academic fields; this approach is also seen as a way for identifying good practices. The knowledge-based model uses different data, results from previous reviews, other reports etc. Hence, tools are not limited to programme reviews but can result in audits, revisions, evaluations and sharing of experience depending on the outcome of the knowledge-based model. This multi-information used model has also contributed to promoting collaboration between departments and avoiding silo thinking within NOKUT and therefore an efficient way of the use of resources.

Evaluation of quality in education, the new activity of the agency, includes a self-assessment and a site-visit, which can be complemented with other quantitative and qualitative data specific to theme chosen for the evaluation scope; the process is concluded with a final report and followed-up by a two-part procedure: the first part takes place within 6 months after the final report is published and consists of a seminar organised with the HEIs that participated in the evaluation, to reflect on the recommendations and plan the quality enhancement activities. The second part of the follow-up is organised within 8 months after the publication of the report; in this stage, the agency looks at the actions taken by the institution for its quality enhancement. The NOKUT's staff involved in evaluations of quality in education could not say, during the interviews, what was the impact of the follow-up, since the evaluation activity still is very new. The review panel was however briefed that a seminar will be organised in February 2023 aiming to discuss with institutions how they have addressed the recommendations from the evaluation reports and how they would like to proceed with the follow-up.

From the interviews with representatives of the institutions involved in the Evaluation of quality of education the panel learned that deadlines and workload could be more clearly communicated to HEIs, considering the long period of the evaluation process and the documentation that the evaluation procedure requires.

The agency confirmed for all EQA activities, that although NOKUT recommendations were not mandatory, the institutions were open to address them in order to comply and improve their activities. This was also confirmed by HEIs.

Analysis

The panel confirms that all EQA activities are transparent and supported by clear and well written documents, available on NOKUT's website. They include all steps required by the ESG, i.e., a self-assessment, a site visit, an external review report and a follow-up, considering the explanations from the 'Evidence' section. The evidence collected from the SAR and gathered in the interviews with different stakeholders convinced the panel that these review processes are regarded as useful and implemented in a consistent and transparent way. At the same time, the panel retains the stakeholders' comment that sometimes there are issues about clear communication from NOKUT's

side of the timeline and documents related to the assessments within Evaluation of quality of education.

The review panel acknowledges NOKUT's efforts to develop follow-up procedures tailored for each of its EQA activities and apply them consistently. Their design in several steps allow the agency to observe not only the accountability, in terms of compliance, of the institution but also its enhancement and further developments. In the panel's view, this approach could also contribute to achieving the balance between quality assurance and quality enhancement NOKUT is aiming at.

Recommendations given to HEIs by NOKUT in the external review reports are greatly appreciated by the stakeholders, as they offer a new perspective and are considered constructive feedback by the institutions. Even though the institutions do not have to follow the recommendations, they opt to do so, as they want to continually improve their quality and they want their efforts to be acknowledged and appreciated by NOKUT.

Panel recommendations

2. The panel recommends the agency to communicate more clearly to the institutions the entire assessment process timeline and workload for Evaluation of quality in education, and to actively communicate possible changes to the originally planned timeline.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2018 review recommendation

ENQA Agency Review Report: none

EQAR Register Committee decision: The Committee considered that NOKUT only partially complies with the standard due to the unsystematic inclusion of students in the review panels in the activity "Initial programme accreditation".

Evidence

The review panel read, besides the SAR, the documentation related to the 2018 ENQA full review, which included evidence on how the agency complied with ESG 2.4 of all EQA activities implemented by that time. The panel also took note of EQAR's decision of partial compliance with the same standard, due to the unsystematic inclusion of students in the review panels in the activity "Initial programme accreditation".

The panel observed a clear progress of the agency to systematically include students in its expert committees for study programme accreditation. The panel learned from the SAR that, presently, all expert committees conducting EQA activities include a student representative. Additional proof is provided in Annex 2 of the SAR, and the panel has confirmed this during the interviews with agency's staff, HEIs and student representatives. For appointing students, NOKUT directly liaises with the National Students' Organisation of Norway (NSO), a national students' union, or with the

local field students' organisations, in specific cases where the NSO is unable to provide student experts.

Regarding the new activity, Evaluation of quality in education, the SAR stated that each panel 'includes a student member as well as academics from relevant subject areas. They may also include one or more employers or professional practitioners. NOKUT strives to include one or more international experts in each committee.' (SAR, page 15). As the process of evaluation lasts 2 years, students who are expected to keep their student status during these 2 years are appointed to panels.

While appreciating the students' competencies being highly relevant in all EQA processes and the student perspective greatly valued within the expert committees, the SAR acknowledges that 'students can sometimes struggle to fully appreciate the value of their role and their contributions, and so an important task for NOKUT is to pay particular attention to the support students may need to feel confident in their particular role as experts'. The panel learned about this challenge also when interviewing the students participating in reviews.

During the site-visit the panel was briefed about the work of expert committees. Usually, they are formed by three to five members, out of which one is a student; all members are equal, and no specific roles are assigned, except for an institutional accreditation when the committee is larger (five to eight members), and a chair is appointed. There are trainings for all the panel members, financially supported by NOKUT, and organised at the agency's premises, where the expectations from the student perspective are particularly explained. The participants in the interviews appreciated the training approach as more formative than informative, and the materials provided.

In the new activity Evaluation of quality in education the expert committee's role starts even sooner than in other reviews, since the experts, including the student member, work together with NOKUT to design the self-evaluation phase, develop the evaluation questions, and plan the site-visit. Since the process extends over a long period (two years), the agency provides briefing/ training for the committee over several stages (SAR, page 15). The experts the review panel spoke to confirmed that the information acquired during trainings were useful and efficient.

The gender distribution among members is considered when appointing the experts in the committee. The agency acknowledges this cannot be always achieved with three expert committee members, but efforts are made, and better results are obtained with larger committees (e.g., five members). The geographical balance was also mentioned during the interviews, given the specificity of the Norwegian HE landscape, and that a HEI can consist of different campuses, geographically distanced.

All members of the expert committee sign a declaration disclaiming any conflicts of interest; at the same time, experts holding ties to an institution participating in the evaluation are not supposed to be part of any evaluation activities pertaining to that institution. The HEIs participating in evaluations are informed about the composition of the expert committee and are able to raise concerns in case of conflict of interest or any other good reason.

Analysis

The panel observes NOKUT's significant progress since the last review, since the agency succeeded in systematically involving students in all EQA activities, especially in study programme accreditation, which was not previously covered. Students are also involved in the follow-up procedures of NOKUT.

All expert committee members equally contribute to the evaluation and take a lead on different matters, not only those of their expertise (e.g., students do not chair only students' sessions, but also others).

The new EQA activity that was evaluated under this targeted review is conducted by groups of external experts that include academics, students, and representatives of the professional field. However, in the panel's view, selecting only students with the minimum of two years before their graduation can, in a way, limit NOKUT, as older students provide more expertise to the evaluation. Therefore, the agency might try providing equal opportunities for students' participation regardless of their year of studies.

NOKUT makes good use of its extended expert database in selecting high quality experts and conducting efficient training sessions. Training is conducted for expert committee members prior to starting the evaluation. The experts that were interviewed were positive about the training and guidance received. The good communication with the agency all along the evaluation process was highly appreciated by everyone interviewed. While the panel appreciates that students are recognised as a valued part of the expert committee, the panel believes that an additional support and a wider sharing of experience would be of much help for students when preparing the written parts of the report. This could contribute to strengthening the confidence of students in their role as experts.

The agency has in place the appropriate mechanisms to ensure adequate implementation of procedures and avoid conflict of interest of the involved experts, both by the agency and institutions participating in evaluations. The conducted interviews confirm their effective application and efficiency.

Panel commendations

3. The review panel commends the agency for its significant progress regarding the systematic students' participation throughout the entire evaluation process, including follow-up procedures.
4. The review panel commends the agency for the way it succeeded to ensure equal contribution of all panel experts to the evaluation.

Panel suggestions for further improvement

2. The review panel suggests the agency to enforce the support offered to students from the expert committees when preparing the written parts of the report, to strengthen their confidence as experts.
3. The review panel suggests the agency to provide equal opportunities for students' participation in Evaluation of quality in education regardless of their year of studies.

Panel conclusion: 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.

2018 review recommendation: none

Evidence

Evaluation of quality in education, the new EQA activity of NOKUT, is focused on enhancement and based on open questions tailored to each evaluation mission, considering its specific scope. By using this approach, the agency is able to get comparative studies on different fields and provide the HEIs with recommendations for their development. The panel read in the SAR and heard during the interviews with several groups that, although the recommendations were not mandatory, the institutions were open to learn about them and to implement them.

Once the scope of an evaluation of quality in education is defined, NOKUT, in collaboration with relevant stakeholders (HEIs involved, experts - including students, professional bodies), sets the list of evaluation questions in a way that the information gathered contributes to an evaluation that should be relevant for the involved institutions. There is a general agreement that using open questions instead of evaluation criteria allows for better consideration of the particular conditions of institutions (i.e., strengths, challenges, etc.) and facilitates formulation of recommendations to help in their enhancement. The agency ensures that the communication with all stakeholders is achieved by several rounds of consultations, and the set of open questions finally agreed are published on the NOKUT's website to ensure transparency.

The open questions are the same for all the study programmes involved in one mission of Evaluation of quality in education and are applied consistently. The SAR mentions different tools for ensuring consistency within the same evaluation mission, e.g., matrices (templates) that the expert committee members use to map data against evaluation questions for each institution, and NOKUT staff reading the report draft to check that the evaluation questions were applied consistently. This has been also confirmed during the interviews with the agency's staff and experts. Given the specificity of this type of EQA procedure, the panel acknowledges there is no question about consistency from one evaluation to another on the content of the criteria used.

Analysis

The panel acknowledges that the innovative character of this new EQA activity implemented by NOKUT is fully in line with the agency's aim to move from quality assurance to quality enhancement. The process of setting the evaluation themes is transparent and the institutions are informed about the evaluation fields, criteria, and open-ended questions. Together with the other stakeholders (experts, professional bodies) the HEIs involved in evaluation get the opportunity to contribute to the process.

All the documents consulted, and the discussions held during the on-site visit informed the review panel that the criteria (i.e., open questions) of the Evaluation of quality in education are applied consistently. The views expressed in various meetings specifically indicated a positive approach to the equal treatment of HEIs and fairness of the evaluations. Overall, NOKUT was referred to by HEIs as being a very professional and rigorous organisation in its judgments, and the approach of this new EQA activity is considered as part of the trust-based dialogue developed in Norwegian society.

Panel commendations

5. The panel commends the agency for the ambitious and honest approach to genuinely strive to and contribute to the further enhancement of HEIs and setting criteria in dialogue with the institutions.

Panel conclusion: 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.

2018 review recommendation: none

Evidence

The reports resulting from Evaluation of quality in education are written by the expert committee members, who take full responsibility for the content. NOKUT only covers the methodological part and provides data to be inserted in the sections referring to the national QA system. Students are involved in writing the reports, which is very much valued, as the panel learned from the interviews.

In the process of writing the report experts use the template provided by the agency to ensure they properly and completely address the evaluation theme. NOKUT staff also reads the report drafted by the committee members, to check if the evaluation questions are applied consistently to all institutions involved in that specific evaluation. The draft report is then sent to the institutions for comments and/ or allegations, before issuing the final version. The final reports are published in full on the agency's website and are also sent directly to the participating institutions and to other relevant stakeholders.

Evaluations of quality in education do not examine compliance with legal requirements and do not result in formal decisions. The reports include recommendations for quality enhancement of the involved institutions. All stakeholders the panel spoke with considered the reports to be clear and the language used was accessible. Their content is found as very useful not only by the participating HEIs but also by the wider professional community of the specific field of the evaluation, as it gives a comprehensive view of the sector and how it can be trusted. While appreciating the process as such, some institutions were uncontented about not knowing exactly when the final report was supposed to be delivered (as mentioned under ESG 2.3) and that the deadlines were not always fulfilled.

The experts participating in Evaluation of quality in education are involved from the early stages of the process (i.e., choosing the evaluation themes, questions, and criteria). As confirmed during the interview with the experts, they receive guidance from NOKUT throughout the entire period of the evaluation, including the stage of report writing.

Analysis

Based on the evidence presented above, the review panel concludes that the NOKUT's new EQA activity, Evaluation of quality in education, results in clear and accessible reports, communicated in a transparent way both by publishing them on the agency's website and by sending them directly to the institutions and relevant stakeholders.

Based on the performed interviews during site visit, the panel concludes that the external evaluation reports are found to be extremely useful by all the stakeholders involved. The evaluations are seen as a very important source of knowledge, and possibly even a powerful tool in designing and planning future developments concerning higher education policy (e.g., for the Ministry, the professional bodies, other organizations able to influence the political decisions).

The HEIs have the opportunity to make comments on the draft report. NOKUT is responsible for scrutinising and approving the final reports.

Following the discussions with different interviewees, the panel concludes that the content of the reports is the result of the independent work of the expert committee members, further analysed and approved by the agency. In response to some of the HEIs' comments, the panel agrees that a clearer timeline regarding the report writing and deadline for issuing its final version would be in benefit of the overall process.

Panel commendations

6. The review panel commends the agency for involving students in writing the external review reports.

Panel conclusion: 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.

2018 review recommendation

ENQA Agency Review Report: none

EQAR Register Committee decision: The Committee considered that NOKUT only partially complies with the standard due to the lack of clarity of the complaints procedure.

Evidence

As confirmed in the 2018 ENQA review, NOKUT has in place an appeals procedure in line with the ESG, valid for all its EQA activities. The Appeals Committee is appointed by the Ministry of Education, fully independent from the agency. The procedure is clear and formalised according to the legal provisions and the HEIs are informed about the possibility to appeal NOKUT's decisions.

Regarding the new EQA activity, Evaluation of quality in education, the SAR describes how appeals can be made based on errors related to NOKUT's principles of evaluation: they should be forwarded to NOKUT within 15 working days after the report's publication and are analysed by the Appeals Panel. The Appeals Panel is a different body than the Appeals Committee mentioned above and consists of three representatives from NOKUT's Board, including a student member. If the appeal is considered valid, the external evaluation report can be withdrawn and/or redrafted. The Appeals Panel reviews the redrafted report before publication.

Following the decision of the EQAR Register Committee, which found the agency partially compliant with ESG 2.7 due to lack of clarity on the complaints procedure, NOKUT has made steps forward in addressing this issue, which were presented in the SAR. The novelty from the previous review is that "NOKUT has now made information on the complaints procedure explicit in the guidelines for the accreditation processes. At the end of these guidelines, there is now a full description of the accreditation process, including the different steps in the dialogue process and the opportunity to voice complaints. Moreover, complaints and appeals procedures for all the external quality assurance activities are included on NOKUT's website and in formal letters to the institution informing it of NOKUT's decisions" (SAR, page 10-11).

The SAR states that the Complaints and Appeals procedures are published on NOKUT's website. During the interviews with HEIs the review panel learned that they considered the Complaints procedure not to be obvious within the documentation, requiring a lot of reading before being able to spot its provisions. However, the HEIs confirm that the possibility to comment on the expert panel's composition clearly stands out in the information presented in the guidelines. The panel also learned, both by reading the SAR and by speaking with NOKUT staff and HEI representatives, that the agency ensures a permanent dialogue with the HEIs participating in all EQA activities, the institutions being consulted in different stages of implementation of EQA procedures and are invited to give feedback. This flexible, dialogue-based approach is very much supported by the agency, which considers it in line with the Norwegian society spirit. All in all, the panel learned that NOKUT does not see benefit in introducing a formal Complaints committee but considers it an additional formalisation contributing to bureaucratization and conformation rather than to an open dialogue.

The agency staff mentioned to the panel that the decisions on appeals and complaints are not published on the agency website, but they are considered to be public information and are subject to the legislation in force, i.e., such information is provided to any interested party upon demand.

Analysis

NOKUT claims it has worked on the development of the complaints and appeals processes since the last evaluation. The agency has improved the procedures by adding information about opportunities for complaints to all their guidelines. According to these guidelines, the opportunities for complaints include surveys to all HEIs that have been subject to a review on how the evaluation process is perceived by the institution as well as the possibility for the HEI to request for a meeting with NOKUT in case of questions they wish to raise regarding the review. Furthermore, information about the opportunities for complaints has been added in the formal letter that NOKUT sends to the HEI about the review results. The panel considers the actions taken by NOKUT to address the suggestions from the previous review and are fully in line with the ESG 2.7.

The agency's stakeholders confirm that they are invited to provide their comments during the entire assessment process, and that they feel welcomed to appeal the decisions, but the panel believes there is still some work to be done to make the complaints procedure known and easy to find within the documentation of NOKUT as provided to the institutions. The panel recognises that information about the complaints procedure is now part of the guidelines, but the institutions still finds this information hard to find, even though they consider that they can solve most issues that come up, through dialogue.

The review panel acknowledges the constant and efficient dialogue between NOKUT and all the stakeholders participating in EQA activities, but it believes that the current way of forming the Appeals Panel for the new EQA activity, Evaluation of quality in education, by involving NOKUT's Board members and not the independent experts, might question the transparency and efficiency of the appeals process in place. Therefore, the review panel suggests the agency reconsider the composition of the Appeals Panel for this new EQA activity.

Panel commendations

7. The review panel commends the agency for ensuring constant and open dialogue between all parties involved in EQA activities of the agency.

Panel recommendations

3. The review panel recommends the agency to make the complaints procedure known and easy to find within the documentation provided to the institutions.

Panel suggestions for further improvement

4. The review panel suggests the agency reconsider the composition of the Appeals Panel for the new EQA activity, Evaluation of quality in education, to ensure its independence from the decision-making body, i.e., the agency's Board.

Panel conclusion: compliant

ENHANCEMENT AREAS

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

NOKUT is acknowledged by all stakeholders as a mature and trustworthy quality assurance agency, playing a specific role in the Norwegian higher education system. The agency considers itself as 'accountable, innovative and service-minded', having highly educated and committed staff able to implement NOKUT's activities in line with its objectives. The review panel was impressed by the willingness of the agency to step out of the typical EQA procedures and to develop new, innovative methodologies, at the same time trying to identify ways for achieving the right balance between control and enhancement. This balance is something that most quality assurance agencies deal with, and sometimes struggle with. Through documentation and dialogue at site visit, the panel believes NOKUT shows a great deal of awareness and professionalism on how to deal with these issues, and how to address the constant need to balance quality control and quality enhancement.

The panel was provided with an additional document, annexed to SAR, explaining the agency's interest in enhancing the design of its methodologies fit for purpose, as they are defined by ESG 2.2. The document has been developed in direct connection with the NOKUT's strategic plan and followed the strengths, weaknesses, opportunities, and threats related to the respective standard, as they could be identified from the self-assessment process. It reflects very good projections for the coming years, as the agency keeps the continuous development of the quality assurance and enhancement practices as fundamental principle of its work and has ambitious goals of 'achieving better integration between external quality assurance practices and the higher education sector in Norway'.

The panel reflected more in detail on two of the EQA activities considered by NOKUT to be relevant for its efforts in reviewing the methodologies to better fit their purpose: Periodic review of institutional quality assurance practices and Evaluation of quality in education.

About the **periodic reviews**, since NOKUT has performed two full cycles of periodic institutional reviews and is completing its third cycle, in preparing for the fourth cycle there was a clear goal to modify methodologies in dialogue with HEIs in order to have more fit for purpose reviews and to prepare for potentially larger methodological changes in the fourth review cycle. Several meetings, workshops, information and consultation events were held with HEIs and other stakeholders and reference groups (national and international). Less and tailored documentation to reduce workload for institutions has been one element of improvement. NOKUT is currently summarising preliminary findings from this round of reviews, being in the middle of planning on the updates on methodology. The panel was able to learn from the interviewees on the enhancement area that the findings seem to lead to the conclusion that the increased dialogue with all parties mentioned above as well as the co-creation approach supports the enhancement direction the agency wishes to strengthen. On the other hand, HEIs expressed their concern about how the EQA methodologies would impact on their IQA systems and underline the importance of distinguishing between the further development of 'methodology', which might be good, and 'criteria', which might need further discussion. In the panel's view, this feedback from HEIs, corroborated with NOKUT's feeling that the agency is still seen by institutions as a 'control organization', could be a good ground for **continuing an open communication with stakeholders and strengthen their role in designing the methodologies, especially in setting the evaluation criteria.**

Another balance issue is about **how to enhance the relevance of EQA procedures in the context of (rather) limited agency resources.** As it has been mentioned in the Introduction of this report, due to structural and organisational changes NOKUT's budget was split with HK-Dir and the agency addressed the financial challenge by focusing on the activities required by law and the ones compliant with ESG. One possibility would be for NOKUT to further **extend the use of the**

knowledge-based approach recently developed and piloted. What is described on page 25 in SAR as a method to identify potential risk could be a good starting point to only perform reviews where needed and thus use the agency resources more carefully. This method could potentially be further developed to also identify possible themes for reviews, not only on the basis of risk analysis but also based on the identification of topics relevant for benchmarking between HEIs, or topics that are of national interest, etc. The panel believes this might also address the institutions' desire for more focused and less bureaucratic EQA procedures, as learned about during the interviews.

Regarding **Evaluation of quality in education**, the panel has tackled, in the section dedicated to ESG 2.2, how this new EQA activity complies with this standard. The panel here further reflects on those findings and is convinced that the procedure has strong 'selling' points, e.g., smaller HEIs getting to learn from those more experienced. However, **the administrative burden on bigger institutions seems to be quite heavy** due to them having many different programmes. Still, it is the panel's understanding that the new EQA activity is very much welcomed by the HEIs, as it provides a solid evaluation within a specific theme. Therefore, the agency could consider continuing to put emphasis on these evaluations and make the periodic reviews slimmer: by applying the above-mentioned risk analysis it would be possible to only check what needs to be checked through short/slim procedures on accountability and rather put more focus on a dialogue and learning between institutions. In this way periodic reviews could become less bureaucratic and more targeted, as it is a wish of HEIs. This approach could also strengthen NOKUTs' focus on contributing to the further enhancement of higher education in Norway, rather than pure control.

The panel also encourages the agency to pursue the idea of **including observers from other institutions in Norway to the reviews**, as it is a not very common practice among quality assurance agencies and an interesting one, which could bring a different perspective to the evaluation process. It is also **another, innovative approach on how NOKUT enhances transparency of its processes**, which worths being continued. Again, this methodological approach could also be a way of showing NOKUT's emphasis on performing reviews that contribute to enhancement and not just control.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	1. The panel commends the agency for its overall dedication on contributing to the HEIs further enhancement and effectiveness of their internal quality assurance processes, giving NOKUT a strong position as a well-respected agency on a national level.
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	2. The review panel commends the agency for its constant preoccupation to design and review the methodologies in order to keep them fit for purpose, and for its remarkable achievements related to the new activity, Evaluations of quality in education.
ESG 2.4 PEER-REVIEW EXPERTS	3. The review panel commends the agency for its significant progress regarding the systematic students' participation throughout the entire evaluation process, including follow-up procedures. 4. The review panel commends the agency for the way it succeeded to ensure equal contribution of all panel experts to the evaluation.
ESG 2.5 CRITERIA FOR OUTCOMES	5. The panel commends the agency for the ambitious and honest approach to genuinely strive to and contribute to the further enhancement of HEIs and setting criteria in dialogue with the institutions.
ESG 2.6 REPORTING	6. The review panel commends the agency for the good practice of involving students in writing the external review reports.
ESG 2.7 COMPLAINTS AND APPEALS	7. The review panel commends the agency for ensuring constant and open dialogue between all parties involved in EQA activities of the agency.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	1. The panel recommends the agency to work with the institutions to develop a digital system for assessment documentation collection, accessibility, and analysis, as the current procedures create an administrative burden.
ESG 2.3 IMPLEMENTING PROCESSES	2. The panel recommends the agency to communicate more clearly to the institutions the entire assessment process timeline and workload for Evaluation of quality in education, and to actively communicate possible changes to the originally planned timeline.
ESG 2.7 COMPLAINTS AND APPEALS	3. The review panel recommends the agency to make the complaints procedure known and easy to find within the documentation provided to the institutions.

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

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	1. The panel suggests the agency provide an English translation of their national legislation on QA procedures, to make their work more visible and easily understood from an international perspective, especially in terms of the agency's 'trust-based' policy of work. This could help other countries follow their example or understand their way of working.
ESG 2.4 PEER-REVIEW EXPERTS	2. The review panel suggests the agency to enforce the support offered to students from the expert committees when preparing the written parts of the report, to strengthen their confidence as experts. 3. The review panel suggests the agency to provide equal opportunities for students' participation in Evaluation of quality in education regardless of their year of studies.
ESG 2.7 COMPLAINTS AND APPEALS	4. The review panel suggests the agency reconsider the composition of the Appeals Panel for the new EQA activity, Evaluation of quality in education, to ensure its independence from the decision-making body, i.e., the agency's Board.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
03.11.2022 – Review panel’s online meeting https://uka-se.zoom.us/j/66909057081?pwd=UEZTYXVJVThRk5kZmI ZdljZSHICUT09			
1	15.00-16.30 (90 min)	Review panel’s kick-off meeting and preparations for site visit	Review Panel: <ul style="list-style-type: none"> - Karin Järplid Head of Department of QA, The Swedish Higher Education Authority, Sweden, Chair, QA professional (ENQA nominee) - Simona Lache Professor and Vice-rector for Internationalization and Quality Evaluation Transilvania University of Brasov, Romania Secretary, academic (EUA nominee) - Pegi Pavletić PhD Student in Pharmaceutical, Nutraceutical and Food sciences, University of Camerino, Italy, panel member, student (ESU nominee, member of the European Students’ Union Quality Assurance Student Experts Pool)
22.11.2022 - Online meeting with the agency's resource person https://us02web.zoom.us/j/85996553158			
2	12.00-13.30 (90 min)	Review panel’s internal meeting and preparations for site visit	Review Panel: <ul style="list-style-type: none"> - Karin Järplid, Chair - Simona Lache, Secretary - Pegi Pavletić, panel member, student
3	13.30-15.00 (90 min)	An online clarification meeting with the agency’s resource person to clarify the agency’s changes since the last full review against the ESG and to understand the background and motive of the agency’s choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	Review Panel: <ul style="list-style-type: none"> - Karin Järplid, Chair - Simona Lache, Secretary - Pegi Pavletić, panel member, student NOKUT representatives: <ul style="list-style-type: none"> - Senior adviser and project member, - Director of Analysis and Evaluation and project owner, - Senior adviser and project manager of the ENQA review

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
02.12.2022 – Review panel’s online meeting https://uka-se.zoom.us/j/65987047692?pwd=OWsIMDgrOXYlcldCRmdhZW5pTGdwZz09			
4	13.00-14.30 (90 min)	Review panel’s internal meeting and preparations for site visit	<ul style="list-style-type: none"> - Karin Järplid, Chair - Simona Lache, Secretary - Pegi Pavletić, panel member, student
04.12.2022 – Day 0 (pre-visit) https://uka-se.zoom.us/j/65987047692?pwd=OWsIMDgrOXYlcldCRmdhZW5pTGdwZz09			
5	18.00-19.30 (90 min)	Review panel’s pre-visit meeting and preparations for day I HYBRID MEETING	<ul style="list-style-type: none"> - Karin Järplid, Chair⁷ - Ulf Hedbjörk, Chair⁸ - Simona Lache, Secretary - Pegi Pavletić, panel member, student
	19.30	Dinner (panel only)	
05.12.2022 – Day I			
	8.30-9.00 (30 min)	Review panel’s private meeting	
6	9.00-10.00 (60 min)	Meeting with the Chief Executive and the Chair of the Board	<ul style="list-style-type: none"> - CEO - Chair of the Board
	10.00-10.15 (15 min)	Review panel’s private discussion	
7	10.15-11.00 (45 min)	Meeting with representatives from the Management Team	<ul style="list-style-type: none"> - Director of the Department for Evaluation and Analysis - Director of the Department for Quality Assurance and Legal Affairs - Head of Quality Assurance of Institutions. - Head of Quality Assurance of Study Programmes - Head of Legal Affairs - Acting Assistant Director of the Department for Evaluation and Analysis
	11.00-11.15	Review panel’s private discussion	

⁷ Karin Järplid, Chair of the panel contributing to the site-visit preparation and post site visit work.

⁸ Ulf Hedbjörk, The Swedish Higher Education Authority, Sweden, QA professional. Chair of the panel during the site-visit, due to Karin Järplid's unavailability for personal reasons.

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	(15 min)		
8	11.15-12.15 (60 min)	Meeting with the agency staff/representatives on the agency's self-selected enhancement area	<ul style="list-style-type: none"> - Senior adviser, Section for Quality Assurance of Institutions, member of ENQA review project team - Senior adviser, Section for Quality Assurance of Institutions, manager of ENQA review project team - Senior adviser, Department for Evaluation and Analysis - Senior adviser, Department for Evaluation and Analysis - Senior adviser, Department for Evaluation and Analysis, member of ENQA review project team
	12.15-12.30 (15 min)	Review panel's private discussion	
9	12.30-13.15 (45 min)	Meeting with agency staff responsible for: communication, digitalization and ICT, human resources, finance and business management	<ul style="list-style-type: none"> - Acting Director for Communications - Director of the Department for Administration and Acting Head of ICT and Digitalization - Head of Human Resources - Head of Finance and Business Management
	13.15-14.15 (60 min)	Lunch (panel only)	
10	14.15-14.55 (40 min)	Meeting with staff of the agency in charge of quality assurance of study programmes	<p>From the Department for Quality Assurance and Legal Affairs, section for Quality Assurance of Study Programmes, staff working on study programme accreditations:</p> <ul style="list-style-type: none"> - Senior adviser, team coordinator of study programme accreditations - Senior adviser 1 - Senior adviser 2 - Senior adviser 3
	14.55-15.05 (10 min)	Review panel's private discussion	
11	15.05-15.45 (40 min)	Meeting with staff of the agency in charge of evaluations of quality in education	<p>From the Department for Evaluation and Analysis, staff working on evaluations of quality in education:</p> <ul style="list-style-type: none"> - Senior adviser, Department for Evaluation and Analysis, member of ENQA review project team - Senior adviser, Department for Evaluation and Analysis

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			- Acting Assistant Director of the Department for Evaluation and Analysis
	15.45-15.55 (10 min)	Review panel's private discussion	
12	15.55-16.35 (40 min)	Meeting with staff of the agency in charge of quality assurance of institutions	From the Department for Quality Assurance and Legal Affairs, Section for Quality Assurance of Institutions, staff working on periodic reviews: <ul style="list-style-type: none"> - Senior adviser, manager of ENQA review project team, project manager of "project 7" - Senior adviser, project manager of "project 2-6" - Senior adviser, project manager of "project 8" - Senior adviser 4 - Senior adviser 5 - Senior adviser 6
	16.35-16.50 (15 min)	Review panel's private discussion	
13	16.50-17.50 (60 min)	Wrap-up meeting among panel members and preparations for day 2	
	19.30	Dinner (panel only)	
06.12.2022 – Day 2			
	8.30-9.00 (30 min)	Review panel's private meeting	
14	9.00-9.45 (45 min)	Meeting with Ministry representatives (including from the Directorate for Higher Education and Skills - "HK-dir")	<ul style="list-style-type: none"> - Director for Department for Higher Education, Research and International Affairs, Ministry of Education and Research - Director for Department for Legal Affairs, Ministry of Education and Research - Senior adviser, Department for Higher Education, Research and International Affairs, Ministry of Education and Research - Executive Director, Division for Higher Education and Research, Norwegian Directorate for Higher Education and Skills
	9.45-10.00 (15 min)	Review panel's private discussion	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
15	10.00-10.50 (50 min)	Meeting with heads of some reviewed HEIs/ HEI representatives (including some involved in evaluations of quality in education) HYBRID MEETING	<ul style="list-style-type: none"> - Rector, Nord University (online) - Rector, University of Stavanger (online) - Pro-Rector for Education, Inland Norway University of Applied Sciences (online) - Pro-Rector BI Norwegian Business School - Dean of Teacher Education, University of Agder
	10.50-11.05 (15 min)	Review panel's private discussion	
16	11.05-11.55 (50 min)	Meeting with quality assurance officers of HEIs (including some involved in evaluations of quality in education) HYBRID MEETING	<ul style="list-style-type: none"> - Head of Quality in Education, Kristiana University College - Head of Section for Quality Assurance, NHH Norwegian School of Economics (online) - Senior adviser, Educational Quality Office, University of Oslo - Educational Advisor, NLA University College (online) - Head of Quality Assurance, Oslo New University College - Senior adviser, Education Quality Division, secretary for executive committee for teacher education, Norwegian University of Science and Technology (online)
	11.55-12.10 (15 min)	Review panel's private discussion	
17	12.10-13.00 (50 min)	Meeting with representatives from the reviewers' pool HYBRID MEETING All interviewees attending digitally	<ul style="list-style-type: none"> - Coordinator and Secretary of the Quality Committee, Gothenborg University, chair and expert committee member, periodic reviews - The University Management, UiT, The Arctic University of Norway, chair and expert committee member, periodic reviews - Professor, University of Bergen, chair and expert committee member, periodic reviews - Head of Department of Law, The University of Southern Denmark, expert committee member, study programme accreditation - Associate professor, University of Oslo, chair of expert committee, Evaluation of Integrated Secondary Teacher Education
	13.00-13.10 (10 min)	Review panel's private discussion	
18	13.10-14.00	Meeting with students involved in	<ul style="list-style-type: none"> - Student, University of Bergen

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	(50 min)	external QA activities (reviewers and representatives of HEIs reviewed by NOKUT) HYBRID MEETING All interviewees attending digitally	<ul style="list-style-type: none"> - Student, University of Agder - PhD.-student, OsloMet
	14.00-15.20 (80 min)	Lunch (panel only)	
19	15.20-16.10 (50 min)	Meeting with stakeholders (including representatives from the Research Council of Norway)	<ul style="list-style-type: none"> - Director Education and Skills, The Confederation of Norwegian Enterprise (NHO) - Special Adviser, The Research Council of Norway - Head of Education, Competence and Research, The Confederation of Unions for Professionals - Special adviser, The Norwegian Association of Researchers - Adviser, The Federation of Norwegian Professional Associations
	16.10-16.25 (15 min)	Review panel's private discussion	
20	16.25-17.15 (50 min or as necessary)	A session to further investigate additional topics that may arise during the site visit regarding agency's compliance with the ESG	
21	17.15-18.15 (60 min)	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
	19.45	Dinner (panel only)	
07.12.2022 – Day 3			
22	09.00-10.00 (60 min)	Meeting among panel members to agree on final issues to clarify	
	10.00-11.00 (60 min)	Meeting with CEO to clarify any pending issues	CEO
23	11.00-12.30 (90 min)	Private meeting between panel members to agree on the main findings; preparation	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
		for the de-briefing meeting	
24	12.30-13.00 (30 min)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings HYBRID MEETING	<ul style="list-style-type: none"> - CEO - Director of the Department for Evaluation and Analysis - Senior adviser and the agency's resource person for the review - Chair of the Board - Deputy Chair of the Board (online) - Student representative of the Board
	13.00-14.00 (60 min)	Lunch (panel only)	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Targeted review of the National body for quality in education (NOKUT) against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between NOKUT, ENQA (coordinator) and EQAR.

July, 2022

1. Background

NOKUT has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2013 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by ENQA.

NOKUT has been a member of ENQA since 2000 and is applying for renewal of ENQA membership.

NOKUT is carrying out the following activities within the scope of the ESG:

- Institutional accreditation⁹
- Study programme accreditation¹⁰
- Periodic review of institutional quality assurance practices¹¹
- Supervision of the institutional accreditation¹²
- Supervision of the programme accreditation⁴
- Evaluations of quality of education¹³

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

⁹Initial accreditation determining an institutional status and granting the associated degree-awarding powers

¹⁰Initial accreditation of study programmes in areas for which the institution does not have degree-awarding power

¹¹Cyclical audit of the effectiveness of internal quality assurance systems

¹²Revision of the institutional or programme accreditation, initiated on an ad-hoc basis to control the institution's continuous adherence to the accreditation criteria

¹³Also referred to as "Evaluation of Integrated secondary teacher education"

Should anything change between the time of application and the review i.e. any type of changes that may affect the registered agency's substantial compliance with the ESG, the agency is expected to inform EQAR at the earliest convenience¹⁴.

The following activities of the applicant are outside the scope of the ESG:

- Accreditation of tertiary vocational study programmes
- Accreditation of tertiary vocational subject areas
- Periodic review of tertiary vocational institutional quality assurance practices
- Supervision of tertiary vocational study programmes and subject areas
- Recognition of foreign education
- Regulatory and economic tasks
- Implementation of the National Student Survey
- Implementation of the National Teacher Survey
- National assessment examinations

These activities are not relevant to the application for renewal on EQAR.

2. Purpose and scope of the targeted review

This review will evaluate the extent to which NOKUT continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support NOKUT's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

- a. ESG 2.1 due to the insufficient coverage of ESG 1.3, 1.4 and 1.5 in the activity "Institutional quality assurance audit"
- b. ESG 2.4 due to the unsystematic inclusion of students in the review panels in the activity "Initial programme accreditation"
- c. ESG 2.7 due to the lack of clarity of the complaints procedure

B) Standards 2.1 to 2.7 for the following activities:

- a. Evaluation of quality of education¹⁵

¹⁴See EQAR's policy on reporting changes <https://www.eqar.eu/register/guide-for-agencies/reporting-and-renewal/>

- C) ESG 2.1 Consideration of internal quality assurance;
 - D) ESG 2.3 Implementing processes;
 - E) Selected enhancement area: ESG 2.2 (Designing methodologies fit for purpose)
 - F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).
- These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, NOKUT and ENQA;
- Nomination and appointment of the review panel by ENQA;
- Self-assessment by NOKUT including the preparation and publication of a self-assessment report;
- A site visit by the review panel to NOKUT;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

ENQA has not provided remunerated (e.g. consultancy) or unremunerated services to NOKUT during the past 5 years, and conversely NOKUT has not provided any remunerated or unremunerated services to ENQA.

3.2 Nomination and appointment of the review team members

The review panel consists of at least 3 members including an academic employed by a higher education institution, a student member and one other expert. At least one of the three members is from another country.

¹⁵The activity derived from the another activity in development at the time of the last review- "Combined Education and Research Evaluations"; no reports were produced at that time.

The third panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, a second quality assurance professional or other stakeholders (for example, a representative of the labour market) may be included in addition to the three panel members. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator 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 agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, ENQA will inform EQAR about the appointed panel members.

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

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

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance

activities abroad (where relevant);

- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NOKUT fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening 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 rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If 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 ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to NOKUT at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1), ESG 2.3, and the self-selected ESG standard(s) for enhancement. The

panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR¹⁶.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If NOKUT chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by NOKUT and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel will sign off on the final version of the external review

¹⁶ See here: <https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2.0-2015.pdf>

report. ENQA will provide to NOKUT the [Declaration of Honour](#) together with the final report.

4. Publication and use of the report

NOKUT will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in March, 2023. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	July 2022
Appointment of review panel members	August 2022
Self-assessment report (SAR) completed by NOKUT	1 September 2022
Screening of SAR by ENQA Review Coordinator	Early September 2022
Preparation of site visit schedule and indicative timetable	September 2022
Briefing of review panel members	October 2022
Review panel site visit	December 2022
Submission of the draft review report to ENQA Review Coordinator	End January 2023
Factual check of the review report by the NOKUT	February 2023
Statement of ENQA to review panel (if applicable)	February 2023
Submission of review report to ENQA	March 2023
Validation of the review report by the Agency Review Committee	April 2023
EQAR Register Committee meeting and decision on the application by NOKUT	June 2023
Decision on ENQA membership by the ENQA Board	September 2023

ANNEX 3: GLOSSARY

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
IQA	internal quality assurance
QA	quality assurance
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

I. DOCUMENTS PROVIDED BY NOKUT

- I.1. Self-assessment report (of September 2022) with embedded links to related documents.
- I.2. Annexes of the self-assessment report:
 - Annex 1: The full portfolio of NOKUT's activities *within* the scope of ESG
 - Annex 2: A selection of expert appointments
 - Annex 3: Program of the follow-up seminar P1
 - Annex 4: Program of the follow-up seminar P2
 - Annex 5: Monitoring quality – poster to EQAF 2022
 - Annex 6: Abstract: NOKUT's selected enhancement standard ESG 2.2
 - Annex 7: Information sent to the international advisory group before its meeting on 6 September 2021
 - Annex 8: Information sent to the international advisory group before its meeting on 15 November 2021 (follow-up)
 - Annex 9: Decision note: Methodological adjustments in Project 7 – periodic review of systematic quality work in higher education
 - Annex 10: Program of the guidance meeting – Project 8
 - Annex 11: Program of the guidance meeting – Project 8
 - Annex 12: Draft report on evaluation of integrated secondary teacher education

II. ADDITIONAL DOCUMENTS PROVIDED BY NOKUT, BEFORE AND DURING THE VISIT, ON REQUEST OF THE REVIEW PANEL

- II.1. The White paper called "Quality Areas for Study Programmes in Higher Education", <https://www.nokut.no/en/norwegian-education/higher-education/quality-areas-for-study-programmes-in-higher-education/>.
- II.2. Regulations concerning Supervision of the Educational Quality in Higher Education .
- II.3. Formal letter stating the unit for financial inspection was transferred from the Ministry of Education and Research to NOKUT on September 1st, 2018.
- II.4. Newsletter from the Ministry to NOKUT in November 2017, explaining the re-organization happening from 2018.
- II.5. Information about how NOKUT involved stakeholders in the evaluation of integrated secondary teacher education: <https://www.nokut.no/en/quality-enhancement/nokut-projects2/evaluation-of-integrated-secondary-teacher-education/>.
- II.6. Example of a powerpoint presentation used when training an expert committee for the accreditation of a study programme.
- II.7. Example of a programme for an expert seminar for project 7 in periodic reviews.
- II.8. Example matrix from the evaluation of integrated secondary teacher education.
- II.9. Evaluation question and prescriptive criteria that corresponded to that particular self-assessment question.
- II.10. Translated evaluation questions and prescriptive evaluation criteria.

III. OTHER SOURCES USED BY THE REVIEW PANEL

NOKUT's website: <https://www.nokut.no/en/>

ENQA TARGETED REVIEW 2023

THIS REPORT presents findings of the ENQA Targeted Review of the Norwegian Agency for Quality Assurance in Education (NOKUT), undertaken in 2022.



European Association for
Quality Assurance in Higher Education