

## Approval of the Application

by the Finnish Education Evaluation Centre (FINEEC) for Renewal of  
Inclusion on the Register

Register Committee

Ref. RC19/A39

Ver. 1.0

Date 2017-06-27

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Application of:	01/02/2016
Agency registered since:	18/11/2010
External review report of:	February 2017
Review coordinated by:	ENQA
Review panel members:	Tia Loukkola (chair), Tue Vinther-Jørgensen, Milan Pol (academic), Beate Tremml (student)
Decision of:	20 June 2017
Registration until:	28/02/2022
Absented themselves from decision-making:	Beate Tremml (incoming Register Committee member)
Attachments:	<ol style="list-style-type: none"> <li><a href="#">Confirmation of eligibility, 12/02/2016</a></li> <li><a href="#">External Review Report, February 2017</a></li> <li><a href="#">Request to the Review Panel, 17/05/2017</a></li> <li><a href="#">Clarification by the Review Panel, 28/05/2017</a></li> </ol>

1. The application of FINEEC adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 12/02/2016.
3. The Register Committee considered the external review report of February 2017 on the compliance of FINEEC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel.

### Analysis:

5. In considering FINEEC's compliance with the ESG, the Register Committee only took into account *Institutional audit of quality systems*, *Engineering programme reviews (for the EUR-ACE label)* and *Thematic evaluations (as specified under 3.1)*.
6. Since the ESG apply to higher education only, FINEEC's activities in other educational sectors are not within the scope of the ESG and, thus, are not pertinent to the application for inclusion on the Register.

7. The Register Committee found that the report provides sufficient evidence and analysis on FINEEC's level of compliance with the ESG.
8. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

### **ESG 2.3 – Implementing processes**

In the review report (p. 28) the panel stated that if a programme is accredited with conditions, the programme is expected to submit an interim report on how it has fulfilled these conditions. The Register Committee was unclear if a follow-up is also implemented for programmes accredited without conditions and have therefore requested the panel to clarify this matter.

The panel (response letter of 28/05/2017) stated that higher education institutions are expected to inform FINEEC of significant changes related to their programme organisation, implementation and development. The panel found no other evidence of a follow-procedure that would apply to programmes accredited without conditions.

The Register Committee considered the design of the follow-up of programmes accredited without conditions to be minimal but nevertheless appropriate.

**The Register Committee concurred with the conclusion of the panel that FINEEC complies with standard 2.3.**

### **ESG 2.7 – Complaints and appeals**

In its decision of initial inclusion (of 18/11/2010) the Register Committee flagged for attention FIN(H)EEC's appeals procedure. The Committee noted that considerations should be given to this matter even though FIN(H)EEC's decisions do not have a formal consequence (in terms of an institution's license or financing), its audits result in a formal result, i.e. the report.

The panel stated that audit results are considered expert opinions and according to Finnish law, appeals can be filed against administrative decisions only. The Register Committee underlined that a system for complaints and appeals should be in place irrespective of the formal status, while the status of the appeal system may be different from the common system of appeals that might be applicable to public administration.

The panel explained that FINEEC has nevertheless made it possible for higher education institutions under review to request an assessment of the results of an audit or a re-audit on the grounds that the audit has not been carried out in compliance with the audit manual. Higher

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education institutions cannot, however, appeal the actual conclusion of the audit or accreditation team nor the decisions of the decision-making committees, a situation the panel described as “less optimal”. The panel further established that until now there was only one request to review the result of an audit, but the case was not yet decided upon by the time of the site visit.

While an appeals system is established and publicly described, due to the lack of actual practice the Register Committee was so far unable to conclude whether the current system, limited in scope, was sufficient to safeguard the interest of institutions under review. The Committee noted that practical experiences with the appeals system should be addressed in the next review of FINEEC.

**The Register Committee therefore concluded that the flag was partially addressed and was unable to concur with the review panel’s conclusion of compliance, but considered that FINEEC complies only partially with standard 2.7.**

### ESG 3.1 – Activities, policy and processes for quality assurance

In the eligibility verification (see letter to FINEEC of 12/02/2016) the Register Committee considered FINEEC’s *thematic evaluations* to be activities within the scope of the ESG, as far as they concern individual institutions or programmes of higher education.

The Register Committee noted from the panel’s analysis that *thematic evaluations* have been paused after the merger of FINHEEC, and that the agency intends, according to its National Plan for Education Evaluations to reintroduce these evaluations between 2016-2019. The Register Committee was unclear whether the panel had considered ESG compliance with regard to thematic evaluations and requested the panel to clarify this matter.

In its response letter, the panel stated that thematic evaluations were found to be outside the scope of the ESG. The panel noted that thematic evaluations did not evaluate individual higher education institutions (or parts of them) or programmes, nor did they address the effectiveness of internal quality assurance as defined in Part 1 of the ESG. The panel, however, added that – although these evaluations are outside the scope of the ESG – the procedures and practices applied by FINEEC largely comply with the ESG.

While the Register Committee concurred with the panel in that thematic evaluations in general fall outside of the scope of the ESG. The Register Committee, however, noted that at least in one particular case, i.e. the

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thematic evaluation of education in the maritime sector (2015-2017), FINEEC (also) addressed the quality management of individual education units and that the results of the FINEEC evaluation will serve as a basis for the International Maritime Organization (IMO) to decide on the right of the educational establishments in the maritime field to issue certificates of competency.

The Register Committee concluded that thematic evaluations are within the scope of the ESG only if they apply to the three cycles described in the QF-EHEA and include formal results, statements or judgements on individual higher education institutions.

Given that FINEEC largely follows the ESG in all its thematic evaluations, the Register Committee concurred with the panel's conclusion of compliance with standard 3.1.

**The Register Committee further underlined that FINEEC is expected to make (a) substantive change report(s) in case its approaches to thematic evaluations should change in the future.**

### ESG 3.3 – Independence

In its analysis, the panel discussed that the processes for the appointment of the Director and members of the Evaluation Council may be seen as political and as a potential risk in terms of FINEEC's organisational independence. The panel thus emphasised the need for transparent procedures with clear and predetermined criteria.

The Register Committee sought clarification from the panel as to how it satisfied itself that there was no undue influence in the nomination process given the current absence of a formal procedure and criteria.

In its response letter, the panel stated that the need for the procedure to be transparent was brought up to underline the need to guarantee the independence of the agency and not to indicate that there was not a formal procedure in place or that it was not transparent.

The panel clarified that in case of the Director, the appointment follows the procedure for the recruitment of civil servants in Finland, while in case of appointing the members of the Evaluation Council, the members are chosen from the proposals made by different stakeholder groups (from the educational sector, teacher education, research, working life and students).

The Register Committee was able to verify that the documentation related to both procedure is published.

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**Having considered the clarification of the panel the Register Committee concurred that FINEEC complies with standard 3.3.**

In the review report the panel stated that FINEEC might in the future merge with the National Board of Education and the Centre for International Mobility (CIMO). The panel noted that this merger might affect the independence of evaluation activities as the tasks of the Board of Education are closely related to the political work of the Ministry of Education and Culture.

**The Register Committee underlined that FINEEC is expected to submit a Substantive Change Report should its organisational status change in the future.**

### ESG 3.4 – Thematic analysis

While a number of thematic analyses have been published since the last external review of the agency, the panel found that the analyses have been paused since the merger of FINHEEC into FINEEC.

The panel also noted that FINEEC has not yet initiated thematic analyses of the accreditations of engineering degree programmes due to the small number of finished accreditations.

**The Register Committee concurred with the conclusion of the panel that FINEEC complies only partially with standard 2.3.**

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

### Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantially compliant	Compliance
2.2	Fully compliant	Compliance
2.3	Fully compliant	Compliance
2.4	Fully compliant	Compliance
2.5	Fully compliant	Compliance
2.6	Fully compliant	Compliance
2.7	Fully compliant	Partial compliance
3.1	Substantially compliant	Compliance
3.2	Fully compliant	Compliance
3.3	Fully compliant	Compliance
3.4	Partially compliant	Partial compliance
3.5	Fully compliant	Compliance

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3.6	Fully compliant	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

10. The Register Committee considered that FINEEC only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that FINEEC continues to comply substantially with the ESG as a whole.
11. The Register Committee therefore renewed FINEEC's inclusion on the Register. FINEEC's renewed inclusion shall be valid until 28/02/2022<sup>1</sup>.
12. The Register Committee further underlined that FINEEC is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity as well as to inform EQAR through Substantive Change Reports where required.

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<sup>1</sup>Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

EQAR | Oudergemselaan/Av. d'Auderghem 36 | BE-1040 Brussels  
The Finnish Education Evaluation Centre (FINEEC)  
Harri Peltoniemi, Director

ZIP CITY  
COUNTRY

Brussels, 12 February 2016

## Confirmation of Eligibility: Application for Renewal of Registration

Application no. A39 of 01/02/2016

Dear Harri,

We hereby confirm that the application by FINEEC for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by FINEEC fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of FINEEC are within the scope of the ESG:

- Institutional audit of quality systems;
- Engineering programme reviews (for the EUR-ACE label);
- Thematic evaluations, as far as they concern institutions or programmes of higher education, i.e. within the Qualifications Framework of the European Higher Education Area (QF-EHEA)

Please ensure that FINEEC's self-evaluation report covers all the aforementioned activities, including reviews carried out in Finland and abroad.

We further remind you that the following issues were flagged when FINEEC (initially listed as FINHEEC) was admitted to the Register, and should be addressed in your self-evaluation report and the external review report:

### ***ESG 2.1 Reference to ESG part 1 [ESG 2005: standard 2.1]***

*Consideration should be given to possibilities FIN(H)EEC has explored in order to achieve greater uniformity in the way its audits take into account the presence and effectiveness of institutional quality assurance processes according to the principles of ESG part 1.*

### ***ESG 2.7: Complaints or appeals procedure [ESG 2005 standard 3.7]***

*Even though FIN(H)EEC's decisions do not have a formal consequence (in terms of an institution's license or financing), its audits result in a formal decision. Consideration should be given to whether FINHEEC has*

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EQAR Founding Members:



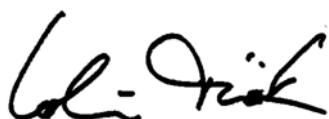
*considered the creation of policies or procedures allowing institutions to make a complaint, appeal or formal representation.*

We confirm that FINEEC's activities in other educational sectors are not within the scope of the ESG, since the ESG only apply to higher education, i.e. the three cycles described in the QF-EHEA. While these activities are not relevant to your application, it is FINEEC's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We kindly ask you to forward this letter to ENQA as the coordinator of the external review and request that ENQA inform the review panel, so as to ensure that all these activities are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. FINEEC has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: ENQA



Brussels, 17 May 2017

## Application by FINEEC for renewal of registration on EQAR

Dear Tia,

The Finnish Education Evaluation Centre (FINEEC) has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of February 2017 on which FINEEC's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of FINEEC's application:

1. **ESG 2.3:** In the review report (p. 28) the panel states that in cases of programmes accredited with conditions, a follow-up is ensured through an interim report on how the programme has fulfilled these conditions.

Could you please clarify what kind of follow-up procedure is implemented by FINEEC in cases of programmes accredited without conditions?

2. **ESG 3.1:** In the eligibility verification (see letter to FINEEC of 12/02/2016) the Register Committee considered FINEEC's *thematic evaluations* as activities within the scope of the ESG, as far as they concern institutions or programmes of higher education.

We note from the panel's analysis that these evaluations have been paused after the merger of FINHEEC into FINEEC, and that the agency intends, according to its National Plan for Education Evaluations to reintroduce these evaluations between 2016-2019. Could you please clarify whether the panel has addressed ESG compliance with regard to thematic evaluations and if so could you please elaborate by referring to key aspects of Part 2 of the ESG?

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3. **ESG 3.3:** Referring to FINEEC's organisational independence, the panel identified as a potential risk that the process for the nomination of the Director and the members of the Evaluation Council may be seen as political. The panel thus emphasised the need for transparent procedures with clear and predetermined criteria.

Could you please clarify how the panel satisfied itself that there was no undue influence in the nomination process given the current absence of a formal procedure and criteria?

We be would grateful if it was possible for you to **respond by 30 May 2017**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on FINEEC's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

**Cc:** Tue Vinther-Jørgensen, Panel Secretary  
ENQA  
FINEEC

Brussels, 28 May 2017

Colin Tück  
EQAR Register Committee

### **Application by FINEEC for renewal of registration on EQAR**

In response to your request for further clarification regarding the external review of FINEEC carried out by an ENQA appointed panel I chaired in 2016, I thereby send you the following answers.

*Question: what kind of follow-up procedure is implemented by FINEEC in case of programmes accredited without conditions?*

According to the 'Standards and Procedures for Engineering Programme Accreditation' manual a higher education institution is expected to inform FINEEC if significant changes are made to the programme learning outcomes or to the programme's organisation, implementation and development. Beyond that, the panel found no evidence of a follow-procedure that would apply to programmes accredited without conditions.

*Question: Whether the panel has addressed ESG compliance with regard to thematic evaluations and if so, how do they comply with the ESG Part 2.*

The review panel considered whether the thematic evaluations are considered to be external QA as defined by the ESG, as EQAR letter to FINEEC had indicated, and took as the starting point the ESG standard 2.1 reading

External quality assurance should address the effectiveness of the internal quality assurance described in Part 1 of the ESG.

The panel further examined the 'Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies' adopted by the EQAR Register Committee in June 2015, which reads

The Register Committee takes into account all quality assurance activities that are within the scope of the ESG (review, audit, evaluation or accreditation of higher education institutions or programmes, including joint programmes), carried out within and outside the EHEA, irrespective of whether they fulfil a statutory mandate or are initiated by higher education institutions on a voluntary basis.

The report on the external review of an agency must thus contain a thorough analysis of all such activities. Other activities that are by their nature not in the remit of the ESG (e.g. organisation of seminars, assessment of individuals) are not considered by the Register Committee.

The thematic evaluations do not evaluate individual higher education institutions (or parts of them) or programmes, nor do they address the effectiveness of internal quality assurance as defined in the Part 1 of the ESG. Their themes and topics are not limited to higher education, but may be broader with a methodology that is defined and tailored in the beginning of each exercise. Therefore, as explained in the panel's review report on pp. 10-11, the panel came to the conclusion that thematic evaluations carried out by FINEEC do not match the criteria for external QA as defined by the ESG, but fall under the category of other activities of the agency (such as assessment of individuals).

The panel also concluded that despite of very similar terms, the thematic evaluations carried out by FINEEC cannot be considered as thematic analysis referred to in standard 3.4 either because they are not based on the results of FINEEC's audit or accreditation processes or reports, but are based on a stand-alone evaluation process.

This being said, the panel learnt through the self-assessment report and interviews that the procedures and practices FINEEC applies in these evaluations largely comply with the ESG:

- Evaluation methodology is adjusted for the purposes of the evaluation in question and the evaluation process and criteria are pre-defined (ESG 2.2 and ESG 2.5)
- external evaluation is based on material produced by the subjects of evaluation, site visits are carried out when applicable and a report is prepared presenting the results (ESG 2.3)
- evaluations are carried out by panels composed of different stakeholders including students (ESG 2.4)
- Final report of the evaluation is published (ESG 2.6).

*Question: How the panel satisfied itself that there was no undue influence in the nomination process given the current absence of formal procedure and criteria for appointing the Director and the Evaluation Council?*

The Director is an appointed civil servant. According to the Finnish legislation civil servants are appointed based on public procedure, which includes publishing the criteria beforehand. The procedure for recruitment of civil servants in Finland is explained in English at [https://www.valtiolle.fi/en-US/Working\\_for\\_The\\_Government](https://www.valtiolle.fi/en-US/Working_for_The_Government).

The review panel brought up the need for the procedure to be transparent as means to underline that, indeed, this is important to guarantee the independence of the agency, not with the intention to indicate that the procedure would not currently be transparent or that there would not be a formal procedure.

Similarly, regarding the appointment of the Evaluation Council, the panel was explained by several interviewees that the members of the Council are chosen from the proposals made by stakeholder groups (different educational sectors, teacher education, research, working life and students) following invitations make proposals. The documentation related to this procedure is public according to the Finnish legislation (<http://www.finlex.fi/fi/laki/ajantasa/1999/19990621>).

Yours sincerely,



Tia Loukkola  
Chair of the external review panel