

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

Register Committee
2022-07-13

Ref. RC35/A95
Ver. 1.0
Date 2022-06-28
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Application of:	2020-05-13
Agency registered since:	2010-11-18
External review report of:	2022-03-08
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Ronny Heintze, Bryan Maguire, Terhi Nokkala, Alexandra-Simona Zamfir,
Decision of:	2022-06-27
Registration until:	2027-03-31
Absented themselves from decision-making:	Riitta Kaarina Pyykkö, Beate Tremml
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 2020-05-29 2. External Review Report (separate file), 2022-03-08 3. Minutes of Telephone Conversation with FINEEC, 2022-05-11

1. The application of 2020-05-13 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2020-05-29.
3. The Register Committee considered the external review report of 2022-03-08 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 agency on 2022-05-06.

Analysis:

5. In considering FINEEC's compliance with the ESG, the Register Committee took into account the following activities:
 - *Quality audits of higher education institutions,*
 - *Engineering programme accreditations (EUR-ACE)*

6. The external review process was also expected to evaluate the activity “Thematic evaluations” against the ESG. From the external review report, the Committee learned that, however, the activity has been considered to be outside of the scope of the ESG by the panel – a stance supported by the agency during the site visit. Due to the conflicting information in the application documents and the external review report, the Committee sought further clarification from the agency on the nature of the activity.

7. The agency has explained that it shared the panel's view that thematic evaluations are an activity outside the scope of the ESG as they have evolved since the last renewal of the registration¹. Following agency’s stance, the “Thematic analyses” will be further analysed in connection to ESG 3.4, not as a separate external QA activity. The Register Committee underlined that the agency and the coordinator were expected to inform EQAR and request a change of the Terms of Reference at their earliest convenience.

8. The activities *national evaluation of education* and *early childhood education and care* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

9. The Register Committee found that the report provides sufficient evidence and analysis on FINEEC’s level of compliance with the ESG.

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

ESG 2.7 – Complaints and appeals

11. Since the registration of the agency on EQAR in 2011 the Committee has flagged for attention the lack of formal complaints system in the agency. The Committee has learned from the review report that the remarks on the review process are still given in an informal manner; hence there is no change of the status quo.

12. The Committee has learned that no advancements have been made in regard to the appeals procedures, i.e. the institutions undergoing a review by FINEEC are still limited to make an appeal only in a case of a negative outcome.

13. Following this, the Committee found that the earlier concerns have not been addressed and that the agency remains only partially compliant with the standard.

¹ The thematic evaluations have gradually changed its form since the last renewal. Currently, they are covering a broader scope of topics expanding beyond teaching and learning in higher education, including other education sectors too. The methodology is rather flexible and tailored, depending on the topic. The thematic evaluations now resemble a research project rather than a typical evaluation envisaged by the ESG. The ESG could be used when drafting the methodology, but are not guiding principles. See more in: Minutes of Telephone Conversation (2022-05-11)

ESG 3.4 – Thematic analysis

14. The Committee has learned that the agency has restarted the process of producing thematic analyses, and plans to increase the frequency of publications in near future. The review panel noted that there is a high interest among staff members to be involved in the conduction of the analyses and that the main outcomes of the thematic analyses are further discussed with the stakeholders.

15. The Register Committee welcomed the efforts made by the agency and found that FINEEC has addressed the concerns raised in the last renewal of the registration in 2016. The Committee therefore concurred with the panel's conclusion that the agency complies with the standard.

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

Conclusion:

17. 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	Full compliance	Compliance
2.2	Full compliance	Compliance
2.3	Full compliance	Compliance
2.4	Full compliance	Compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Substantial compliance	Partial compliance
3.1	Full compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Full compliance	Compliance
3.5	Full compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

18. The Register Committee considered that FINEEC only achieved partial compliance with one of the standards. The Committee considered that the institutions can still address issues related to the review process, even though mainly through informal channels, and that the negative outcomes can be appealed through a well-defined process (ESG 2.7). The Register

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Committee concluded that this specific issue does not weigh heavily and that FINEEC continues to comply substantially with the ESG as a whole.

19. The Register Committee therefore renewed FINEEC's inclusion on the Register. FINEEC's renewed inclusion shall be valid until 2027-03-31².

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

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² Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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Finnish Education Evaluation Centre (FINEEC)
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Brussels, 29 May 2020

Confirmation of Eligibility: Application for Inclusion on the Register Application no. A95 of 13/05/2020

Dear Mirella,

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 European Association for Quality Assurance of Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

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

- *quality audits of higher education institutions,*
- *engineering programme accreditations (EUR-ACE),*
- *thematic evaluations of higher education¹.*

Please ensure that FINEEC's self-evaluation report covers all the aforementioned activities.

We further remind you that FINEEC was found to comply only partially with a number of standards when FINEEC's registration was last renewed and that a few matters were raised following FINEEC's last change report; the issues related thereto should be specifically addressed in your self-evaluation report and the external review report:

ESG 2.7 – Complaints and appeals

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

¹ As far as the evaluations concern individual institutions or programmes of higher education within the Qualifications Framework of the European Higher Education Area (QF-EHEA)

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common system of appeals that might be applicable to public administration.

The Register Committee was unable to conclude whether the current appeals system, being 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.

ESG 3.3 – Independence

The Register Committee noted that FINEEC became administratively attached to the new Finnish National Agency for Education (EDUFI). The new organisational arrangements should be considered in detail, including whether the sharing of EDUFI's support services had any bearing on FINEEC's – especially operational – independence in the long term.

ESG 3.4 – Thematic analysis

In its last review, the Register Committee noted that thematic analyses have been paused since the merger of FINHEEC into FINEEC and thus should be analysed in the next review of the agency.

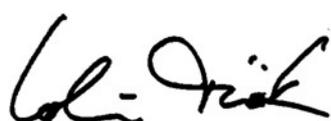
We confirm that the *national evaluation of education and early childhood education and care* are activities outside the scope of the ESG as these activities do not address education levels belonging to the higher education qualifications framework (QF-EHEA).

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 will forward this letter to European Association for Quality Assurance of Higher Education (ENQA) in its capacity of the coordinator of the external review. At the same time we underline that it is FINEEC's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned 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,



Colin Tück
(Director)

Cc: ENQA (coordinator)

Application by Finnish Education Evaluation Centre (FINEEC) for Renewal of Registration

Minutes of Telephone Conversation

Date of the conversation:	11/05/2022
Representative of FINEEC:	Mirella Nordblad, Helka Kekäläinen
Representative of EQAR:	Aleksandra Zhivkovikj, Colin Tuck

1. FINEEC has submitted on 2020-05-13 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR). The application for renewal of the registration and, later, the Tripartite Terms of Reference enlisted the activity “Thematic evaluations”, registered with EQAR since 2010, within the scope of the ESG. Hence, the external review process was expected to evaluate this activity against the ESG.
2. From the external review report, submitted on 2022-03-17, the Register committee has learned that the activity “Thematic evaluations” has been considered as an activity outside of the scope of the ESG by the panel – a stance supported by the agency during the site visit.
3. In order to prepare the deliberations of the Register Committee on the FINEEC’s activity “Thematic evaluations” and its status, EQAR contacted FINEEC via telephone to clarify the matter(s) below.
4. FINEEC agreed to clarify the matter(s) by means of a telephone conversation.
5. FINEEC confirmed that, in fact, it shared the panel’s view that thematic evaluations are an activity outside the scope of the ESG. According to the agency, following the FINEEC’s merger with two other organizations that led to the establishment of FINEEC in 2014, the agency has gradually changed its approach to the thematic evaluations. Since then, the thematic evaluations have been following the National Plan for Education Evaluations (2016–2019, 2020–2023), covering broader scope of topics expanding beyond the remit of teaching and learning in higher education, including other education sectors too.
6. FINEEC clarified that the methodology is rather flexible and tailored, depending on the topic. A thematic evaluation resembles a research project rather than a typical evaluation envisaged by the ESG. As a result, some of the ESG standards are fulfilled, but this may be more coincidental than intentional, as they are not the guiding principles when constructing the methodology. The agency has demonstrated an example on the later: some evaluations are solely based on statistics,

findings from previous research and surveys, rather than site visits performed by a panel of experts and self-assessment of the institutions under evaluation.

7. Thematic evaluations were deemed an ESG activity in the 2020 application form submitted by FINEEC, but this was considered incorrect in hindsight and was influenced by how these evaluations were treated in earlier applications and reviews, before the change in approach.