

Approval of the Application
by Slovak Accreditation Agency for Higher Education
(SAAHE)
for Inclusion on the Register

Register Committee
 11-12 December 2023

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Ver. 1.0
Date 2023-12-15
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Application of:	2022-10-04		
Agency registered since:	n.a.		
Type of review:	Full	Site visit:	2023-03-29
External review report of:	2023-09-20	Submitted:	2023-11-03
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Carmen Fenoll, Jakub Bakonyi, Maria Weber, Stephen Jackson		
Decision of:	2023-12-12		
Registration until:	2028-09-30		
Absented themselves from decision-making:	Peter Ondreička (observer)		
Attachments:	1. External Review Report, 2023-09-20 2. Minuted clarification by the Agency, 2023-11-28		

1. The application of 2022-10-04 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-10-25.
3. The Register Committee considered the external review report of 2023-09-20 on the compliance of SAAHE 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 SAAHE on 2023-11-28.

Analysis:

5. In considering SAAHE's compliance with the ESG, the Register Committee took into account:
 - Institutional accreditation
 - Programme accreditation

- State approval proceeding

6. The following activity is not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register:

- Accreditation of habilitation and inauguration proceedings.

7. The Register Committee found that the report provides sufficient evidence and analysis on SAAHE's level of compliance with the ESG.

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

ESG 2.6 – Reporting

9. The panel reported that it could not identify any clear links where the decisions and the evaluation reports of the review panels are being published on the agency's website.

10. The Register Committee sought further clarification from the agency (see minuted clarification) in order to understand the agency's practice regarding the publication of reports and decision.

11. The agency explained (and presented) how the reports are being published on its website i.e. via links within a document uploaded on its website each time a new report is finalised. SAAHE further explained that the agency also publishes, the applications and self-assessment reports of higher education institutions undergoing review procedures. The agency is aware that the current way of publishing reports and decision is not ideal but explained that it was hesitant in making any changes during its review process.

12. The Register Committee sought further clarification on the lack of published reports in 2022 and 2023.

13. The agency explained that following a change in legislation, in 2021, all higher education institutions are required to undergo institutional accreditation and had to apply for such a review by the end of 2022. The agency clarified that while all 33 higher education institutions have applied for an institutional accreditation, at the moment no procedure has yet been finalised. A pending decision by SAAHE's Executive Board is expected in February 2024. (see minuted clarification)

14. Having considered the report and the clarification by the agency, the Committee concluded that despite the difficulty in accessing the links of published reports, that SAAHE has been publishing full reports and decisions on its website. The Register Committee underlined the recommendation by the panel to ensure the publishing of reports and decisions in a more accessible and informative way than the current practice.

15. The Register Committee noted that the agency is expected to inform the Register once it has concluded its first institutional accreditation procedure.

16. Having considered the review report and the clarification by the agency, the Register Committee was unable to concur with the panel's judgement of partial compliance, and concluded that SAAHE complies with ESG 2.6.

ESG 3.1 – Activities, policy and processes for quality assurance

17. The Register Committee noted the panel's concerns in terms of a lack of student perspective in the Executive Board of the agency. While the agency has two nominated student representatives in the Executive Board, neither one is a student or a recent graduate of a higher education institution.

18. Furthermore, the Committee noted the unrealistic requirements for one of the two student representatives to hold a third-level university degree and have at least 15 years of academic or professional experience.

19. Considering the lack of diverse stakeholder representation within the governance of the agency i.e., the limiting conditions in allowing the representation of a student or employer perspective **the Register Committee could not follow the panel's judgement of compliance and found that SAAHE complies only partially with ESG 3.1.**

ESG 3.3 – Independence

20. The Register Committee noted the panel's analysis that the members of the Executive Board, of the Board of Appeal, the agency's auditor and the Head of Office are all appointed by the Ministry (following a public selection procedure).

21. The Committee further noted the panel's concerns regarding a high involvement of the minister in oversight of the agency i.e, in appointing the Chair of the Executive Board, in maintaining authority to dismiss the Chair and all members of the Executive Board (if there are any infringements of legislation or internal rules of the agency).

22. Taking into consideration the panel's analysis, the Register Committee expressed its concern that the organisational independence of the agency is constrained by its close link and dependency on the Ministry. The Committee underlined the panel's recommendation to ensure that the agency becomes fully independent and is able to act autonomously without any influence from the Ministry or other authorities. **The Register Committee concurred with the panel that SAAHE complies only partially with ESG 3.3.**

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

Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Compliance
2.2	Compliance	Compliance
2.3	Compliance	Compliance
2.4	Compliance	Compliance
2.5	Compliance	Compliance
2.6	Partial compliance	Compliance
2.7	Compliance	Compliance
3.1	Compliance	Partial Compliance
3.2	Compliance	Compliance
3.3	Partial compliance	Partial Compliance
3.4	Compliance	Compliance
3.5	Compliance	Compliance
3.6	Compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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25. The Register Committee considered that SAAHE only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that SAAHE complies substantially with the ESG as a whole.

26. The Register Committee therefore approved the application for inclusion on the Register. SAAHE's inclusion shall be valid until 2028-09-30¹.

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

¹ Inclusion is valid for five years from the date of the external review report, see §3.25 of the EQAR Procedures for Applications.

Application by SAAHE for Inclusion on the Register

Clarification provided by the Agency

Register Committee

Date of the conversation: 2023-11-28

Panel members: Robert Redhammer, Dušan Faktor, Rene Matlovič, Soňa Gewisslerová, Andrea Zacharova

Representative of EQAR: Blazhe Todorovski

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1. SAAHE has submitted on 2022-10-04 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR). On 2023-11-03, SAAHE submitted the external review panel's report of 2023-09-20.
2. In order to prepare the deliberations of the Register Committee on SAAHE' compliance with the ESG, EQAR contacted the Agency to clarify the matter(s) below.

ESG 2.6 – Reporting

3. EQAR representative asked the agency to elaborate on the publication of review reports and where the agency publishes its reports. As per the review report, the panel was unable to identify any visible links on the agency's website neither from the reports nor from the decisions.
4. The agency representatives explained that the review reports are published on its website, while noting that they are aware that the reports are not easily accessible (user friendly). The report are published on the website (see [link](#)) through a single document (list) where all of the procedures are presented where both the decision and review report from each procedures are published via separate hyperlink for each document (see [link](#)). The agency noted that they have been considering improving the publishing of reports on their website, but were hesitant doing it during the whole agency review procedure and application for inclusion on EQAR.
5. The agency representatives also informed EQAR that besides the review reports and decisions, they also publish the applications and all supporting documentation by the higher education institutions on its website, e.g., applications for institutional review (see [link](#)) and applications for programme review (see [link](#)).
6. EQAR representative asked the agency to elaborate why the last review report published by SAAHE has been in February 2022, with a site-visit

organised in June 2021. EQAR further asked the representatives how many procedures does the agency had and coordinated in 2022 and 2023.

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7. The representatives clarified that in 2021 the national legislation in Slovakia changed and the requirements of the new legislations were that each higher education institution must undergo an institutional accreditation, meaning that each institution is obliged to apply for a procedure with the agency latest by end of 2022. Therefore, there has not been single finalised procedure yet by the agency in the new cycle.
8. The agency elaborated that all procedures for all 33 higher education institutions are already ongoing and are different stage, e.g., some are almost finalised and pending decision by SAAHE's Executive Board, at its next meeting in February 2024, and others are in the phase of site-visit by the review panels. The agency noted that based on the legislation and the procedures each procedure needs to be finalised in 12 months after their eligibility has been confirmed.
9. EQAR representative further asked whether once pending review reports have decision by the Executive Board will be published in the current document and how the agency ensures consistency in publishing the reports in timely manner.
10. The agency representatives informed that one of the technical staff from the agency will do the publication immediately after the Executive Board and noted that they agree that the process is not the most optimal one and therefore they are looking into possible solution which they are planning to implement in 2024, but not in the middle of their agency review by ENQA and application for inclusion on EQAR.