

REVIEW OF THE DANISH EVALUATION INSTITUTE

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1. EXECUTIVE SUMMARY

This report analyses the extent to which the Danish Evaluation Institute (EVA) complies with the European Standards and Guidelines for external quality assurance agencies and thus with the membership criteria of the European Association for Quality Assurance Agencies in Higher Education (ENQA). It was conducted at the request of the Danish Ministry of Education by an expert panel appointed by the Ministry and approved by the ENQA Board.

The assessment procedure involved a self-evaluation by EVA and a two-day visit by the Panel, during which it pursued questions raised by the self-evaluation report.

EVA, which succeeded the Danish Centre for Evaluation of Higher Education, was established in 1999 with the task of evaluating the whole educational sector from primary and secondary education to higher education. In 2007, through an Act of Parliament, this arrangement was changed. In its place, a model of accreditation of all higher education programmes was introduced and an Accreditation Council was established to take accreditation decisions. EVA was given the task of providing accrediting reports on new and existing programmes for professionally oriented programmes offered by University Colleges, Academies of Professional Higher Education under the aegis of the Ministry of Education and programmes in the arts under the aegis of the Ministry of Culture¹. A new organisation, ACE Denmark, was established to provide a similar service in respect of university programmes under the Ministry of Science, Technology and Innovation.

Using the excellent self-evaluation report, the legislation and other essential documents as its starting point, the Panel interviewed the EV3A board, management and staff, ministry representatives and members of the Accreditation Council's board, representatives of institutions, students and other stakeholders. In the light of the evidence provided by the documentation and the interviews the Panel considered that EVA's overall performance against the standards of the ESG is high. EVA is well-led and well-managed at both Board and Executive levels and has great capacity for change and development. The Panel found that EVA complied fully with all the standards, except three: EVA's use of the institutions' internal quality assurance procedures; processes fit for purpose; and independence; all of which it assessed as substantially compliant. The Panel wishes to recommend to the Ministry of Education that EVA should in future be empowered to determine and freely develop the accreditation criteria against which it judges programmes.

1 The Ministry of Culture is not by law required to choose EVA, but has so far done so.

INTRODUCTION

2.1 Background of the review

The current review was commissioned by the Danish Ministry of Education on the initiative of the Danish Evaluation Institute (EVA) in order to comply with the ENQA regulations which require agencies to undergo an external review at least once every five years (a review of type A according to ENQA's guidelines for external review).

The review Panel consisted of the following members:

- Peter Williams, former Chief Executive of the Quality Assurance Agency of Higher Education (UK) and Chair of ENQA, Chair
- Staffan Wahlén, former Senior Advisor at the Swedish National Agency for Higher Education, Secretary
- Inger Andersen, Head Executive of Education and Daycare Facilities, Municipality of Frederiksberg
- Laust Joen Jakobsen, Rector of University College Copenhagen
- Gertie De Fraeye, student of law at Ghent University and former Chair of the Flemish Student Union.

EVA was evaluated in 2005 in a review of type B in accordance with the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*², i.e. one with a number of purposes, including the fulfilment of the external review requirements of ENQA membership.

The 2005 review panel found that "EVA complies with the ENQA quality standards in all essentials" (*In the Eyes of Others*³) and commended the agency on its evaluation methodology and efforts for improvement. However, the panel also identified areas for development, among them the broad mission of the agency, a relatively low level of visibility in the public eye and weak follow-up of evaluations. Some of these considerations were due to the legislation under which EVA operates and could not be addressed without modification of the legal framework. The ENQA Board re-confirmed the full membership of EVA in ENQA in September 2006 on the basis of the external review and of a supplementary review completed in 2006 which specifically assessed EVA's compliance with the ESG. Since then, the Danish system of quality assurance of higher education has changed considerably, which means that several considerations in the 2005 report are no longer valid.

2 *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*, p.6, www.enqa.eu

3 *In the Eyes of Others*, www.enqa.eu/reviews_past.lasso

2.2 The review process

The review is mainly based on the information provided by the Danish Evaluation Institute in its self-evaluation document, on accreditation reports, legislation and other material and, not least, on interviews with EVA staff and various groups of stakeholders during the site visit. The recent review of ACE Denmark, EVA's sister agency, has also been a point of reference (see below and www.enqa.eu/reviews_reports.lasso). Finally, EVA's website (www.eva.dk) has been a useful source of information.

The Self-Evaluation Document

A draft version of the self-evaluation document was prepared by EVA's management group and then discussed in detail by the staff involved in accreditation and other activities conducted by EVA in the field of higher education. Comments were also invited from ACE Denmark and the Accreditation Council.

In the Panel's view, the self-evaluation document is exemplary. It is well structured, informative, self-reflective and analytical and thus provides a good basis for the review. The annexes are useful, and in the few cases where additional information was felt to be needed, further documents were readily provided, when necessary translated into English.

Site visit

In preparation of the site visit the Chair and the Secretary visited EVA on October 8, 2010. The programme of the site visit was discussed and a number of points with regard to EVA's tasks were clarified (see Appendix 2).

The Panel visited EVA in Copenhagen on 23-24 November, 2010. A preparatory meeting was held on the afternoon of November 22 to further discuss the self-evaluation document and to draw up the lines of inquiry.

During the two days of the visit the Panel met with the EVA Board, the EVA management and various categories of EVA staff involved in activities relative to higher education, the Accreditation Council, experts who had taken part in accreditations, representatives of higher education stakeholders⁴: Ministries, principals of institutions, institutional contact people and representatives of student organisations.

The site visit was well prepared and the Panel could benefit from fruitful, informative and rewarding discussions which shed further light on the processes developed by EVA, their implementation and outcomes.

The preparation of the Panel's report

The programme of the site visit allowed the Panel enough time to discuss the format and of the report. There was agreement in the Panel on the assessment of each of the criteria as well as on the overall assessment. After the visit the secretary prepared a draft version of the report which was agreed by the Chair and the Panel members. In accordance with the Terms of Reference (see appendix 3), it was then sent to EVA for verification of facts. The final version was submitted to the Danish Ministry of Education and EVA on xx March.

4 See Appendix 2 for the programme of the site visit.

2.3 Higher education in Denmark

A comprehensive description of the Danish higher education system was included in an ENQA report on ACE Denmark, published in September 2010. (External Review of The Accreditation Institution, www.ENQA.eu/lasso) With the agreement of the Chairs of ENQA and the ACE Denmark review panel that description is to be found in Annex 1 of this report.

It should be added to that description that there is also in Denmark a system of adult further education, which includes special programmes leading to degrees and qualifications corresponding to those in the ordinary higher education system. They offer the possibility for students to use their professional and general experience (two years' relevant work experience is normally required). These programmes, too, are accredited by EVA; the master's programmes offered by the universities are accredited by ACE Denmark.

2.4 The national quality assurance system in Denmark and the place and functions of EVA⁵.

Since the 2005 review the Danish quality assurance system, and hence the functions and tasks of EVA, have undergone considerable change. A Higher Education Act passed in 2007 introduced accreditation of all new and existing study programmes at all levels of higher education; this is now a pre-condition for obtaining public funding.

The Act established an Accreditation Council to exercise the executive power of awarding all accreditations. A new agency, ACE Denmark, was created to accredit those study programmes that come under the auspices of the Ministry of Science, Technology and Innovation, i.e. new and existing bachelor's, master's (candidatus) and master's programmes at the universities. EVA was given responsibility for accrediting short and medium cycle programmes under the Ministry of Education, bachelor's and master's programmes under the Ministry of Culture and further education programmes for adults. At the same time EVA retained its responsibilities with regard to early childhood education and primary and secondary education which it had been assigned in 2001. EVA also retained the right to initiate and implement thematic evaluations and analyses of higher education.

The Act further decrees that accreditation should be based on predefined criteria, which were later specified by three ministerial orders:

- an order for study programmes under the Minister of Science, Technology and Innovation (BEK nr 1402 af 14/12/2009),
- an order for study programmes under the Minister of Education (BEK nr 684 af 27/06/2008)
- an order for study programmes under the Minister of Culture (BEK nr 1174 af 01/012/2008).

⁵ The description is mainly based on that of the self-evaluation and on *Joint Master's Programmes – Joint Evaluations. A Nordic Challenge*. Report prepared by the Nordic Quality Assurance Network in Higher Education (www.nokut.no/Documents/NOQA). An historical overview of the Danish higher education quality assurance system is found in the External Review of the Accreditation Institution pp. 9-10.

Thus, EVA has a very extensive task, which covers the whole of Danish education save university programmes. Also, EVA must take into account three different sets of criteria for accreditation, which can only be changed by executive order. The figure below shows the relationship between the three actors under the ministries in the field of accreditation of higher education provision, the Accreditation Council, ACE Denmark and EVA.

Figure 1. The structure of the Danish accreditation system⁶



The accreditation processes themselves are carried out by EVA and ACE Denmark. The Council has two major functions:

- to make the decisions regarding accreditation of all higher education provision, based on the reports prepared by the two agencies.
- to assure the quality of EVA's processes (and those of ACE Denmark) and to make ensure that the processes of EVA and ACE Denmark are in line with the European Standards and Guidelines for Quality Assurance in Higher Education (ESG).

EVA maintains close contact with both the Accreditation Council and ACE Denmark. There are regular formal and informal meetings to exchange information.

The role of higher education institutions in quality assurance.

While the Accreditation Council and the two agencies, ACE Denmark and EVA carry out external quality assurance functions in relation to higher education institutions, there is also a legal requirement for higher education institutions to evaluate their own performance and to publish the results on their websites. These evaluations may be taken into account in the accreditation of programmes conducted by the agencies, if the institutions so wish. The internal quality work of institutions also includes the use of external examiners for some of the examinations required for graduation, a system which has existed for well over 150 years.

6 EVA's self-evaluation document, p. 18.

2.5 EVA's processes in quality assurance of higher education

EVA's history dates back to the early 1990s when the Danish government established the Centre for Quality Assurance and Evaluation in Higher Education, thus creating one of the first agencies of its kind in Europe. The Centre was followed, in 1999, by the new Danish Evaluation Institute (*Danmarks Evalueringsinstitut – EVA*), with a mandate which included quality assurance across the whole spectrum of education in Denmark from primary and secondary education to higher education and adult education and training. (From 2007 evaluation of pre-school provision was added to EVA's mandate). With regard to higher education, EVA developed a model of systematic evaluation of Danish higher education programmes in universities, university colleges and Academies of Professional Higher Education, while also successively trying out other methods, including (from 2003) institutional audit and (between 2005 and 2006) accreditation of both programmes and institutions.

As previously mentioned, a new structure for quality assurance of higher education was introduced in 2007 with the creation of the Accreditation Council and ACE Denmark. EVA's most important responsibility in higher education then became accreditation of all new and existing professionally oriented higher education programmes offered by the university colleges under the auspices of the Ministry of Education and higher education programmes under the auspices of the Ministry of Culture. A few programmes under other ministries (the Ministries of Justice and Defence and the Danish Maritime Authority) are also accredited by EVA. Finally some thematic evaluations relating to the higher education system within EVA's purview and based on the annual action plan are initiated each year. Further, EVA undertakes commissioned work on demand, including evaluations⁷. So far (between September 2008 and November 2010), EVA has undertaken accreditation reviews of c. 260 new programmes, 60 existing programmes, besides 2 systems evaluations.

Two slightly different methods are used for accreditation reviews, one for new programmes and one for already existing programmes. For the latter, EVA uses a generally accepted methodology for quality assurance in the European Higher Education Area with a self-evaluation submitted by the unit under review, appointment of a panel of experts including students, a site visit and a report, which is published on EVA's website. For new programmes site visits are not included, nor are there any student members of the panels. There are also fewer criteria, none, of course, relating to achieved learning outcomes. The reason why there are no site visits is stated to be that since new programmes do not exist yet, the material to be assessed consists mostly of plans and that, consequently, they would not provide any further evidence.

All reports contain the expert panel's assessment of the extent to which the programme fulfils the pre-defined criteria and also a recommendation for a decision. However, the final accreditation decision, which for existing programmes may be either positive, conditional or negative, is made by the Accreditation Council. If the Council's decision is conditional, a new review must be undertaken within one year. For new programmes there can only be a positive decision or a refusal. The formal decision is then taken by the Ministry. So, in fact, a positive recommendation by the

⁷ An interesting recent example of this kind of task is an evaluation of the universities' provision of programmes taught in English commissioned by the Danish University and Property Agency.

experts and EVA can be overruled by the Council. The Ministry can then decide not to approve the Council's decision. A negative decision by the Council cannot, however, be overruled by the Ministry.

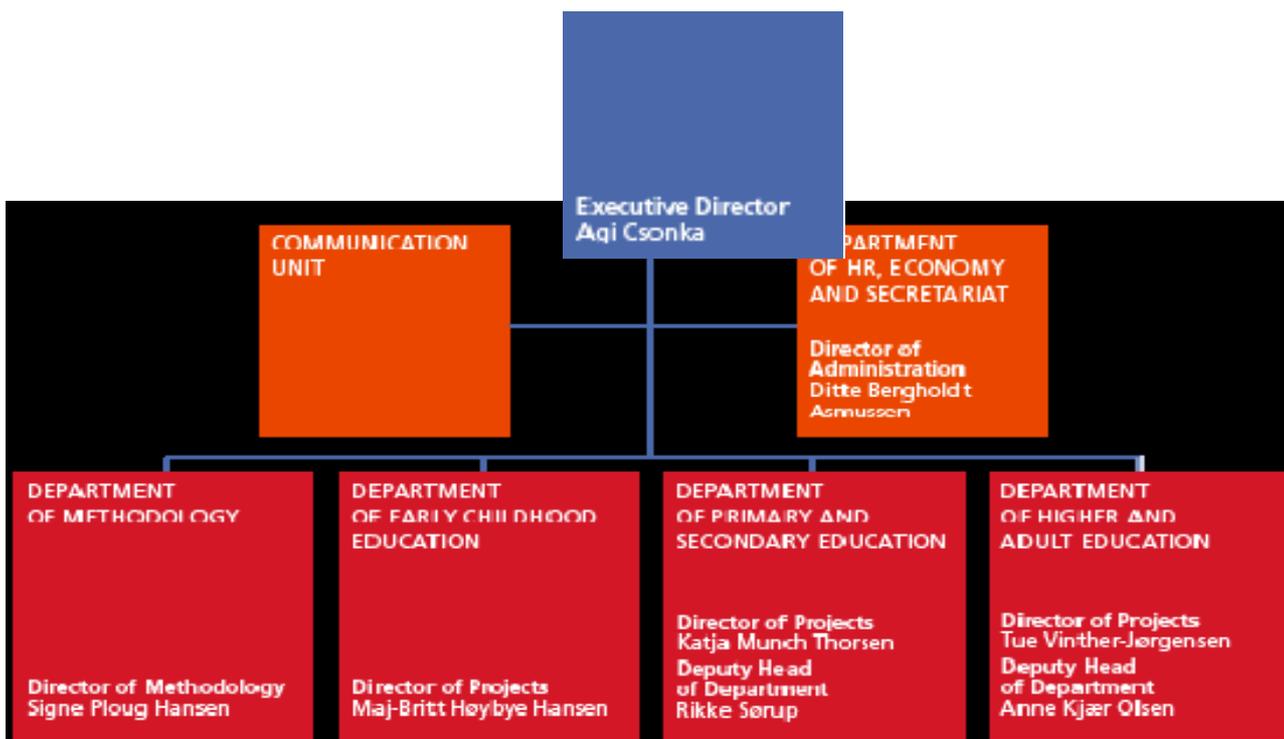
More detailed descriptions and analyses of these steps are given in chapters 3 and 4 under each of ENQA's criteria for assessment.

2.6 The organisation and funding of EVA

EVA's Board has nine members who are nominated by relevant stakeholder bodies. The Chair is appointed by the Minister of Education. The Board has overall responsibility for EVA, appoints the Executive director, and endorses the annual action plan, including the systems evaluations, and the annual budget and accounts. The Ministry, however, makes the final decision as to the action plan in its entirety (see the self-evaluation p. 10), and, with the Ministry of Culture, the budget for the year.

Besides the Board there is a Committee of Representatives, which is an advisory body consisting of 34 members from the education system. They give advice on EVA's action plan, the annual report and the prioritisation of planned activities but has no part in decision-making.

The internal organisation of EVA is illustrated by the following diagram taken from EVA's self-evaluation:





EVA has three departments for evaluation and accreditation corresponding to the different levels of the educational system. In addition, there is a *Communication Unit* responsible for external information, and a *Department of HR, Economy and Secretariat* responsible for, among other things, personnel, finance, budgeting and administrative support.

The Department of Methodology plays an important role in the design, organisation and follow-up of evaluation projects. It has a special responsibility for the internal quality assurance system.

The Department of Higher and Adult Education is responsible, through the *Unit for Higher Education*, for accreditation of programmes offered by higher education institutions under the Ministries of Education and Culture. It also carries out system-wide and thematic evaluations as well as commissioned projects. The *Unit for Adult Education and Continuing Training* conducts projects, in which the experience gained through EVA's activities in the whole of the Danish educational system can be used, for e.g. analyses of the recognition of prior Learning.

The Communication Unit is responsible for the dissemination of results of evaluation and accreditation projects via EVA's website and newsletters.

To undertake all its various tasks, EVA employs about 140 people, including more than 30 students, who work as assistants in the various activities. In accreditation and evaluation exercises student assistants are responsible for administrative functions such as helping to organise site visits, taking notes at meetings, etc. They are hired on an individual project basis and many of them become involved in several projects. For them, this may be a stepping-stone to employment in the education sector or other areas in the public sector, and for EVA, it helps evaluation officers to focus on interviews and reports. The Department of Higher and Adult Education currently includes 32 staff (one Head of Department, one Deputy Head, six special advisers, 14 evaluation officers and ten student assistants).

Funding

EVA has mainly two sources of income, the state budget and, to a lesser extent, commissioned work for various stakeholders. About 30 per cent of the total budget of DKK 62.2 million is used for activities related to higher education. For the three-year period 2010 - 2012, DKK 12 million are earmarked annually in the state budget for accreditation, whereas c. DKK 5 million are used for evaluations initiated through the action plan. A little less (c. DKK 4 million) is generated through commissioned activities.

3. COMPLIANCE WITH THE EUROPEAN STANDARDS AND GUIDELINES (ESG PART 2)

3.1 ESG. 2.1: USE OF INTERNAL QUALITY ASSURANCE PROCEDURES

Standard:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

Description:

The Order of the Danish Ministry of Education on accreditation states explicitly that "EVA undertakes its duties under this Executive Order in accordance with Standards and guidelines for quality assurance within the European Higher Education Area as adopted by the European education ministers". In a grid in its self-evaluation document (pp. 21-22) EVA demonstrates the extent to which the criteria for accreditation established by order of the Ministries of Education and Culture for both new and approved programmes relate to those of the European Standards and Guidelines for higher education institutions.

Considerations:

The Panel has studied the documentation carefully and discussed the issue with the various groups interviewed. The fact that the ESG standards are referred to in the Ministerial Order is a clear sign that they are considered to be important both for higher education institutions and the work of EVA and ACE Denmark.

The accreditation system itself aims to assure the quality of individual programmes. At the same time, higher education institutions are by law required to operate their own quality assurance systems. In the accreditation process internal institutional quality assurance plays a role as evidenced by the criteria (No. 7 for new programmes under the Ministry of Education, nos. 10, 13 and 14 for existing programmes under the Ministry of Education and 11 for existing programmes under the Ministry of Culture). Thus, it is addressed in the self-evaluations, discussed at site visits and assessed in reports as a separate item. But how the institutions' own quality processes relate to the assessment by EVA of the remaining criteria and how they could contribute to making external processes less intensive remains unclear.

There are some points, however where there is a link between the external assessment and internal processes. For example, the participation of external examiners ensures quality control of assessment of students and their attainment of intended learning outcomes. This is a well established function in Danish higher education which contributes to the maintenance of standards. It is an integral part of the institutions' quality assurance process and is also useful for external processes.

The Panel notes that the accreditation system itself, rules out full compliance with Standard 2 (approval, monitoring and periodic review of programmes and awards), since programmes are not approved by the institution itself nor even by EVA but, in accordance with Accreditation Act no. 294 of 27 March 2007, are accredited by the Accreditation Council (on the basis of criteria established by Order of the Ministers of Education and Culture) and in the last resort by the Minister, who may refuse to accept a positive accreditation decision by the Accreditation Council (but not a negative decision). The Panel is aware, however, that this is a feature that characterises many national quality assurance systems that use programme accreditation.

From time to time, EVA carries out system-wide evaluations which provide an overview of the state of a programme at all institutions that offer it. These reports are based to a large extent on information gathered in the accreditation process. This is commendable, but does not replace the need for follow-up of individual accreditations. The accreditation system does not include a procedure to find out how institutions and programmes follow up on accreditations that have been approved (except in the case of programmes which have been given conditional approval and, of course, in the next round of accreditations after six years). Nor do accreditation reports contain recommendations to encourage institutions and programmes to reflect on further development, except by interpreting the experts' views on the fulfilment of each standard. In the view of the Panel, the introduction of a follow-up after, say, three years would give further useful information to programme providers, institutions and EVA. The Panel recognises that such an arrangement might require modifications of the legislation.

Assessment:

The Panel finds that EVA complies substantially with Standard 1.

Recommendations:

The Panel realises that although it is difficult under the present accreditation legislation, EVA might consider paying more attention to internal quality assurance processes and how they affect the different standards in order to make the accreditation process less burdensome for all those concerned.

A (light) follow-up procedure would contribute to the effectiveness of the accreditation system.

3.2 ESG 2.2: DEVELOPMENT OF EXTERNAL QUALITY ASSURANCE PROCESSES

Standard:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are

finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

Description:

EVA conducted a number of accreditations of both programmes and institutions in 2004. The current system was introduced three years later by an Act of Parliament and consequential Ministerial Orders. Proposals for accreditation criteria to be used with institutions under the Ministries of Education and Culture were developed by EVA, partly based on the experiences of the "first generation" of accreditation, in close contact with the higher education institutions, the Ministries concerned and other stakeholders. The development process included discussions on concepts and criteria as well as pilot tests, and the final versions took account of input from stakeholders and of the experiences from the pilots. Two slightly different models were developed: one for existing programmes and one for new programmes. The procedure and criteria were disseminated at conferences and are publicly available on the Internet.

Considerations:

The material presented and the discussions with various stakeholders during the site visit made it clear that that they had been consulted and involved to a large extent in the development of methods, procedures and criteria and that their views had been taken into account. However, any wish or need to change the criteria once they have been established seems to the Panel to be a longer and more complicated process than necessary, since they are laid down by executive order and have to go through lengthy ministry processes.

It should be added that EVA is notable for being in the forefront when trying out methods. Before accreditation became a legal requirement, developments were going on, at the same time as a trial programme of institutional audit was being implemented. This year EVA is developing a concept aimed at audit of the university colleges' quality assurance systems.

Assessment:

The Panel finds that EVA complies fully with Standard 2.

Recommendation:

The Panel recommends that the process used for approving any revisions to the criteria and procedures proposed in the light of experiences of the accreditation scheme should be simplified.

3.3 ESG 2.3: CRITERIA FOR DECISIONS

Standard:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guidelines:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interest of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

Description:

The criteria for accreditation are to be found in official documents published by EVA as well as on the websites of EVA and the Ministries. The guidelines developed by EVA include information on how the criteria should be interpreted.

Consistency across programmes is achieved in several ways. First, accreditation reviews are carried out in clusters: for approved programmes these clusters are based on the similarity of contents (e.g. all nursing programmes undergo accreditation at the same time) and new programmes are clustered according to when they apply. This arrangement makes it possible for evaluation officers and experts to compare judgements and, if need be, to adjust them. Secondly, there are mechanisms in place to achieve consistency of both judgement and method. The evaluation officers involved in the accreditation of similar programmes meet to discuss continuing projects, while the instructions to panel experts states that they are required to take consistency into account and to reconsider their judgements if they do not agree with the conclusions reached by other panels. In the last resort, the Accreditation Board also scrutinises the reports for consistency.

Considerations:

In the light of the information material received, and its discussions with both EVA staff, students, representatives of institutions, and members of expert panels, the Panel is convinced that EVA makes considerable efforts to publicise information about its procedures to all those concerned. The Panel had access to reports and was able to ascertain that they provide good evidence for the conclusions drawn. Also the reports are scrutinised at several levels in order to ensure that conclusions agree with the spirit of the criteria.

Assessment:

The Panel finds that EVA complies fully with Standard 3.

3.4 ESG 2.4: PROCESSES FIT FOR PURPOSE

Standard:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guidelines:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached.;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement;
- policies as a fundamental element in the assurance of quality.

Description:

EVA carries out two main types of accreditation: one for existing programmes and one for new programmes. There are essentially two differences between the processes of the two types: accreditation of new programmes does not include a site-visit, and the expert panels for new programmes have no student members. The reasons stated for these differences are that new programmes are only at a planning stage, so there is nothing to visit and there are no students to meet.

When recruiting experts for accreditation of existing programmes, EVA asks the main stakeholders to nominate candidates, who, together with candidates from a database of some 800 potential experts, make a pool from which EVA appoints the panels. They are carefully vetted before being approved by the project managers. In order to achieve consistency, experts are often asked to participate in several accreditations. EVA exercises a strict policy of no conflict of interests and experts are required to sign a document to the effect that no conflict of interest could arise from any current or recent relationship that they might have with the institution or programme under review.

As a rule, there are international experts in accreditation of art programmes, and occasionally ("when relevant") in other accreditation reviews.

Information on the procedures is provided in writing, through seminars at the beginning of each round of accreditations to which prospective experts are invited, and through individual guidance throughout the process, which is based on the model of self-evaluation, site-visit, draft report, and published report.

Considerations:

The documentation provided to the Panel includes instructions to experts, "Principper for ekspertpaneler"⁸, which details the regulations concerning the expected background, experience and knowledge of the experts. Like all the documentation regarding the accreditation process, this document, too, is published on EVA's website. It includes full and clear information regarding conflict of interests, including the facts that experts must sign a contract declaring their independence of the institution and that institutions are given the opportunity to object if they have well founded reasons to doubt the independence of the proposed expert.

⁸ This document is partly based on the principles of both ENQA and ECA, the European Consortium of Accreditation, of which EVA is a member.

Experts are trained, even if the Panel is not fully convinced that all experts attend the seminars arranged for them by EVA at the beginning of each round. Nevertheless, according to those interviewed during the site visit they are given enough information about the criteria and questions to be asked to be able to undertake their task competently. Interviewing technique is not, however, included.

The relatively low number of international experts, except in accreditation of art programmes, may be understandable in view of the size of the task (260 new programmes and about 60 approved programmes accredited so far) and the problem of finding international experts who read and speak Danish. It is more of a concern to this expert Panel that students are included only for accreditation of approved programmes. The main reason given is that these programmes do not yet exist. However, the institutions applying for accreditation must demonstrate both that there is a need for the programme in terms of a labour market and that they have teaching staff with appropriate academic competencies. In the Panel's view, finding students who can participate in an assessment of the need and quality of a proposed programme would be both possible and meaningful.

The same reason is given for not including site visits in the procedures regarding new programmes. Although it is true that site visits give considerable weight to the assessments and may add further information, it is equally important to recognise that the large number of applications received each year makes it necessary to slim the process. In the view of the Panel, the exclusion of site visits for new programmes may be one way, although not ideal, of limiting costs and efforts.

As was pointed out in the considerations relating to Criterion 2.1, follow-up is not routinely included as part of the process. However, the criteria for both new and existing programmes under the Ministries of Education and Culture require programmes and institutions to undertake their own quality assurance and "use the knowledge which is gained through evaluation, quality assurance and development to improve and develop its activities" (criterion 14, Approved academy profession degree programmes and professional bachelor's programmes).

Assessment: The Panel finds that EVA complies substantially with Standard 4.

3.5 ESG 2.5: REPORTING

Standard:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should

be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

Description:

EVA publishes several forms of reports on higher education: accreditation reports, evaluation reports and reports on system-wide analyses based on accreditations as well as research-based articles and reports on best practice in quality assurance e.g. investigations into drop-out rates and their causes. The reports are available both on EVA's website and as booklets. There are also brief summaries of system-wide reports and evaluation reports to be found on the website.

The accreditation reports are published on EVA's website at the same time as they are submitted to the Accreditation Council, which then makes the final decision. This means that both the views of the experts as expressed in EVA's report and those of the Council as expressed in its decision are publicly available, and that the Council does not influence EVA's recommendations. It should be added that EVA also arranges seminars and workshops on its various activities for different stakeholders.

Considerations:

EVA produces a large variety of different reports on higher education, most of them on accreditations, but also other interesting, well written and useful reports. The accreditation reports are clear and well structured and are in complete uniformity with the requirements of the ENQA standard, but are somewhat limited in scope, since they are concerned exclusively with the fulfilment of the criteria and leave little room for e.g. recommendations or more general comments, except implicitly. This is understandable, as the accreditation reports are not designed for the general public. The Panel found in the interviews that they probably have a limited readership and that they are not widely read by students, who rarely use them for the purpose of decisions on e.g. where to study. Nor, according to the Panel's interviewees, are the accreditation reports widely quoted in the media, other than in exceptional cases such as the accreditation of nursing education. Few are translated into English, in spite of the fact that EVA is very active in international cooperation in the field of quality assurance of higher education. However, other reports, such as analyses of higher education and thematic evaluations, are more widely read and quoted in the media.

Assessment:

The Panel finds that EVA complies fully with Standard 5.

Recommendation:

While reporting is clearly fit for purpose, the Panel recommends that EVA pursue a more active media policy in order to bring its work to the attention of the wider public.

3.6 ESG 2.6:FOLLOW-UP PROCEDURES

Standard:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines:

Quality assurance is not principally about individual external scrutiny events; it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

Description:

As has been mentioned above, neither the Accreditation Act nor the Ministerial Orders allow for regular follow-up procedures except with regard to conditional accreditation. In that case, measures taken by institutions and programmes to improve are normally reviewed within one year. For programmes that have been approved, follow-up does not occur until the next accreditation round, after six years. It is expected, as stated in criterion 14 for existing Academy Profession programmes and Professional Bachelor's programmes and criterion 11 for Bachelor's and Master's programmes in Arts, that the institutions address weaknesses through their own quality assurance systems. The legislation does not, however, give EVA the right to monitor whether, or to what extent, this is done. The system-wide analyses in which problems faced by programmes as a whole are discussed are useful, but cannot be seen as substitutes for follow-up of programmes at individual institutions.

The accreditation reports are confined to information on the provision under review, considerations and assessments. There are no recommendations, but the text, especially for criteria assessed as partially fulfilled, contains comments on points where improvement is desirable.

Considerations:

While EVA is not allowed, under the legislation, to follow up individual reports on programmes that have been approved, except in cases of conditional accreditation decisions, it makes efforts to compile, analyse and disseminate information on programme clusters, for example on the basis of the accreditation of the nursing programmes, and to point out strengths and weaknesses in the subject as a whole. This is done in reports and seminars aimed at institutions providing the programmes in question. EVA also arranges courses and seminars on evaluation methodology for institutions and programmes for the benefit of their own quality assurance function.

Assessment:

The Panel finds that EVA complies fully with Standard 6.

Recommendation:

The Panel urges the Ministries concerned to introduce the possibility of allowing EVA to establish continued contacts after the accreditation reviews in order to follow the further development of programmes. This would also be a way of monitoring the effect of the accreditation system.

3.7 ESG 2.7: PERIODIC REVIEWS

Standard:

External quality assurances of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines:

Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Description:

The Accreditation Act specifies, with regard to university programmes, that the validity of an accreditation is the length of the programme plus two years, which is normally interpreted to mean six years. The Act holds no equivalent specification for programmes under the Ministry of Education. However, in the remarks to the Act on Academy Profession programmes and Professional Bachelor programmes it is stated that these are expected to be subject to further accreditation within a period of five to six years, which is, in consequence, interpreted as the length of validity of accreditation of programmes under the Ministry of Education.

This information is found in documents issued by the relevant authorities, including EVA. In the case of conditional positive accreditation, existing programmes are subject to re-accreditation within one year, the process concentrating on those criteria where their quality has been questioned.

Considerations:

It is clear both from the Accreditation Act and from other material that the Panel has studied that EVA conducts cyclical accreditation. This information is published on EVA's and the Accreditation Council's websites. The time span between every two accreditation reviews is usually six years but may, in some cases, be shorter.

The first accreditations under the new Act took place in 2008, and there is a "rotation" plan on the website of the Ministry of Education specifying the order in which existing programmes will be accredited until 2014. Similar information is given by the Ministry of Culture.

Assessment:

The Panel finds that EVA complies fully with Standard 7.

3.8 ESG 2.8: SYSTEM-WIDE ANALYSIS

Standard:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Guidelines:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Description:

EVA's annual action plan includes projects for the whole of the educational area for which the agency is responsible. In the field of higher education they cover e.g. surveys of problems such as high drop-out rates and analyses of the provision of programmes across all Danish institutions, e.g. the nursing programmes. As the accreditation cycle develops, there will be many more opportunities for these kinds of studies, which provide opportunities to comment on common problems and examples of good practice.

Considerations:

In the view of the Panel EVA plans and carries out projects aiming at providing information on the system of higher education within its purview. The reports the Panel had access to demonstrated that problems and examples of good practice are highlighted and are of considerable potential use to institutions and the Ministry and are a good source of information for the general public. Seminars organised by EVA also encourage discussion of issues of common interest.

These examples are interesting enough, but the Panel hopes that there will be more similar projects as the accreditation cycle develops.

Assessment:

The Panel finds that EVA complies fully with Standard 8.

4. COMPLIANCE WITH ENQA MEMBERSHIP CRITERIA (ESG PART 3)

4.1 MEMBERSHIP CRITERION 1: ESG 3.1 USE OF EXTERNAL QUALITY ASSURANCE PROCEDURES FOR HIGHER EDUCATION and ESG 3.3 ACTIVITIES

ESG 3.1 USE OF EXTERNAL QUALITY ASSURANCE PROCEDURES

Standard:

The external quality assurance agencies should take into account the presence and effectiveness of the external quality assurance procedures described in Part 2 of the European Standards and Guidelines.

Guidelines:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the process applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should, together with the standards for quality assurance agencies, constitute the basis for professional and credible external quality assurance of higher education institutions.

Description and considerations:

EVA's compliance with Membership according to this standard has been addressed in the text above (2.1 – 2.8). The majority of the criteria were assessed as fully compliant with the Standards and Guidelines for Quality Assurance Agencies. Where EVA was found to be substantially compliant, the reason lies mostly in the legislative framework, or other factors beyond EVA's control.

Assessment: The Panel finds that EVA complies fully with Standard 3.1.

ESG 3.3. ACTIVITIES

Standard:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Description:

As has been discussed above, mainly in section 2.5, accreditation of higher education programmes in the non-university sector of higher education in Denmark has been one of EVA's core functions since 2007. Accreditation reviews recur regularly in cycles of six years. A plan for the period up to 2014 has been drawn up and is found on the the Ministry's websites, to which EVA is linked.

New programmes apply for accreditation, and once accredited they will be added to the "rotation" list. There are two application periods per year for new programmes under the Ministry of Education.

Existing programmes that have received a positive accreditation will normally not be re-accredited until after six years. Existing programmes that have received a conditional positive accreditation will be re-visited after one year or less. Programmes judged not to fulfil the criteria substantially will be closed down.

New programmes are either fully accredited or denied accreditation, in which case they will have to re-apply.

Considerations:

The legislation, the information on EVA's website and the interviews with staff and with stakeholders make it clear that EVA's implementation of the accreditation system is planned to be undertaken on a regular basis and is a core function of the Institute. It is a new system, which began only in 2008, so the beginning of second round of accreditations will not take place until four years from now. However, regularity is solidly built into the system.

It is somewhat surprising that the Ministry, and not EVA (or even the Accreditation Council), is responsible for the "rotation list", even if it is prepared in consultation with the Council and EVA. The accreditation process is EVA's mandate and the order in which existing programmes should be accredited is, in the Panel's view, an important part of that process.

Assessment:

The Panel finds that EVA complies fully with Standard 3.

Assessment of ENQA Membership Criterion 1:

The Panel finds that EVA complies fully with Membership Criterion 1.

4.2 MEMBERSHIP CRITERION 2: ESG 3.2 OFFICIAL STATUS

Standard

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Description:

EVA was established in 1999 and given its new tasks and role by the Accreditation Act of 2007. This means that it is part of a larger framework. Within this framework EVA carries out accreditation activities related to the non-university sector and education under the Ministry of Culture, whereas ACE Denmark is concerned with accreditation of university provision. The Accreditation Council is responsible for accreditation decisions of all higher education as well as for supervising the quality and the internal quality assurance of the two accrediting bodies.

EVA is also subject to, *inter alia*, the Danish Public Administration Act and the Danish Access to Public Information Act and to decisions and orders of the Ministries of Education and Culture.

Considerations:

EVA is formally fully recognised by the Danish Parliament and Government as is clear from legislation and Ministerial Orders, and thus has a firm legal status.

Assessment:

The Panel finds that EVA complies fully with Membership Criterion 2.

4.3 MEMBERSHIP CRITERION 3: ESG 3.4 RESOURCES

Standard

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective manner, with appropriate provision for the development of their processes and procedures and staff.

Description:

EVA's total budget for 2010 is DKK 62.2 million (appr. € 7 590 000), of which about 30 per cent are used for activities regarding the non-university sector of higher education. For the three-year period 2010 – 2012, DKK 12 million (c. € 1 470 000) are earmarked in the state budget annually for accreditation, whereas c. DKK 5 million (€ 612 000) are intended for evaluations and other activities initiated through the annual action plan. On top of the money appropriated in the state budget, a little less (c. DKK 4 million or € 490 000) is generated through commissioned activities.

Out of the c. 140 people employed by EVA, a total of 32 work in the Department of Higher and Adult Education. They include one Head of Department, one Deputy Head, six special advisers 14 evaluation officers and 10 student assistants. These last are responsible for administrative functions such as helping to organise site visits, taking notes at meetings, etc. and are hired on a project basis. Many of them become involved in several projects. For them, this may be a stepping-stone to employment in the education sector, and for EVA, it helps evaluation officers to focus on interviews and reports.

Other departments are also involved in evaluation and accreditation activities, e.g. the Communication Department and the Department of Methodology.

Considerations:

In the light of its interviews with staff and management the Panel found that the income derived from the state budget and commissioned work is adequate for the accreditation and evaluation tasks.

Assessment:

The Panel finds that EVA complies fully with Membership Criterion 3.

4.4 MEMBERSHIP CRITERION 4: ESG 3.5 MISSION STATEMENT

Standard

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available document.

Guidelines

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Description

EVA has a mission statement and a vision which encompass activities within all sectors for which they are responsible. Furthermore, EVA has visions and strategic plans, not only for the organisation as a whole, but also for each department. For the Higher and Adult Education Department, the vision is as follows:

"Our evaluations, accreditations and other assignments:

1. are meaningful for our institutions and other stakeholders.
2. are based on the newest national and international knowledge regarding quality assurance and evaluation methods.
3. qualify the debate on central challenges in our sector (higher education).
4. are based on a high level of professionalism and a good working environment."

A vision, mission and values are also to be found in the strategy document for 2009 – 11:

"Mission

– *this is what we do*

EVA works to improve the educational system and daycare for children.

This is done using tools such as evaluations, analyses and other tools that contribute to developing the quality of the education system.

Vision

– *this is what we want to do*

EVA wants to be the leading player in Denmark. EVA also wants to be acknowledged internationally within the fields of evaluation, quality development of education and daycare.

Values

– *this is how we work*

EVA strives to be

- credible
- committed
- adaptable
- open"

Considerations

EVA has a well-developed mission and vision both for the organisation as a whole and for quality assurance of higher education, which are published on its website. The aims and objectives of accreditation are to be found in the Accreditation Act and the Ministers' Orders, and the visions and missions quoted above refer, in this respect, to the ambitions of EVA when implementing these tasks.

Assessment

The Panel finds that EVA complies fully with Membership Criterion 4.

4.5 MEMBERSHIP CRITERION 5: ESG 3.6 INDEPENDENCE

Standard

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments;
- is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Description

The EVA Act states that "the Danish Evaluation Institute is an independent government institution..." and may, on its own initiative, "perform systematic evaluations of learning, study programmes and teaching ..." "The Institute sets topics and methods for the individual evaluations." (EVA Act Part 1, Sections 1 and 2).

The Order of the Ministry of Education affirms that "EVA undertakes its duties under the Executive Order in accordance with Standards and Guidelines for quality assurance within the European Higher Education Area ..." (Order of the Danish Ministry of Education on Accreditation, Part 3, Section 5).

Thus, the Act and the Order stress the importance of independence and ESG. In evaluations, EVA is free to set up its own processes as long as they comply with ESG. Accreditation principles also, by and large follow these standards. There is, for example, no interference in the nomination and final appointment of experts, nor in the conclusions of the accreditation reports. The final accreditation decision, however, is taken by the Accreditation Council. The Ministry has the right not to approve a positive accreditation decision but cannot change a negative decision.

EVA consistently consults relevant stakeholders, such as higher education institutions, student organisations and employers with regard to its activities and development. Also, the Committee of Representatives discusses and makes recommendations, for example, for the coming year's Action Plan, but does not participate in decision-making.

Considerations

EVA is independent of institutions, employers and students, although these groups are involved in its work through their participation as advisers in planning activities, implementation of projects (the Committee of Representatives) and as experts. There is no doubt, however, that EVA makes the final decisions on, for example, the development of methods of evaluation, the annual action plan (although it is nominally approved by the Ministry) and reports and recommendations sent to the Accreditation Council.

The structure of the accreditation organisation is unusual and based on the strictly binary higher education system. The model of two evaluation agencies, EVA and ACE Denmark, responsible for the reviews, and one decision-making body, the Accreditation Council, ensures consistency in accreditation judgements between the two higher education sectors, at the same time as it allows for necessary differences in approach. It is something of an anomaly that EVA and ACE Denmark have different forms of affiliation with the Accreditation Council and that as an independent agency EVA is not allowed to make its own decisions on accreditation. Having examined the Accreditation Act and the Ministerial Orders and taking account of the interviews with the Ministries, the Accreditation Council and EVA's Board and Management, the Panel finds, however, that accreditation decisions are, by and large, remote from the political agenda and are in no way subject to inappropriate external interference.

The members of the Board of EVA are appointed by the Minister of Education, but recommendations from relevant bodies are consistently taken into account when these appointments are made, as evidenced in the interviews with Board members and the EVA management. The Panel noted with some surprise, however, that the Board did not have a student member. There seems to be nothing in the EVA Act to prevent the nomination of student member, and the Panel would recommend such a move.

According to the EVA Act (part 2 a, Section 12 a) "the Minister for Education lays down detailed rules on accreditation assessments and accreditation reports". This is further specified in the Order of the Ministry of Education on accreditation, and the Panel wishes to comment on some of these rules.

With regard to higher education provision within its purview, the Ministry of Education decides in a process of screening those who have applied for accreditation, which new programmes should be referred to EVA. It does this both in order to exercise its planning role in ensuring an even spread of higher education provision across the country, and to oversee the use of financial resources (all accredited programmes are entitled to receive stated support). This may be looked upon as a limitation of EVA's independence, but, as the Panel sees it, it is a decision based not on qualitative grounds, but rather on "the basis of general educational policy considerations and strategic considerations" (Order of the Ministry of Education, Section 2 (2)) and can be said to infringe EVA's independence only to a limited extent.

In the last resort, it is also the Ministry that decides which new programmes that have been accredited by the Council will finally be approved. Although this is done on the same grounds as above, it seems to the Panel to be a minor, but unnecessary limitation of the independence of EVA and the Council.

When it comes to the accreditation criteria, however, the relationship between the Accreditation Agencies, especially EVA, and the Ministries is more problematic and of some concern to the Panel from the point of view of compliance with the independence criterion.

According to the legislation it is the relevant Ministry that determines the criteria for accreditation decisions. In this way the Ministry is involved in defining the details of quality in higher education. It is true that the development of the 10 criteria for new programmes and the 17 for existing programmes under the Ministry of Education were in practice developed through an extensive process involving EVA drawing up a proposal, followed by consultations with the higher education institutions, student organisations and other stakeholders, but the final decision on criteria nevertheless rests with the Ministry of Education. This makes it a time-consuming task to change any of the criteria, should this be considered necessary in the light of experience. As mentioned above, however, EVA is responsible for the translation of the criteria into guidelines and produces, on its website, independent reports with recommendations to the Accreditation Council.

Assessment

The Panel finds that EVA complies substantially with Membership Criterion 5.

Recommendations

The Panel recommends the inclusion of a student on the Board of EVA. Also, in the view of the Panel, EVA should be empowered to determine and develop accreditation criteria without the intervention of the Ministries.

4.6 MEMBERSHIP CRITERION 6: ESG CRITERION 3.7 EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES

Standard

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed

professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people. Agencies that make formal quality assurance decisions or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Description:

Processes, criteria and procedures used by EVA are published on EVA's website and found in many other documents which are readily available, and are thus both predefined and publicly accessible.

The processes involve self-assessment, and an external assessment by a group of experts including, for accreditation of existing programmes, a student member. Accreditation panels for new programmes have no student experts. The model includes site visits for existing programmes, but not for new ones on the grounds that the assessment is based mainly on plans, and requires only a simplified process.

EVA produces an accreditation report, including recommendations to the Accreditation Council. There are three kinds of recommendations with regard to existing programmes: positive, conditional or refused accreditation. If the Accreditation Council follows a recommendation for conditional accreditation, there will be a follow-up within one year, which will concentrate on the items that were considered weak. Applications from new programmes can only be positively accredited or refused.

There is no appeals or complaints procedure except for legal issues, via referral to the Danish University and Property Agency.

Considerations:

EVA meets the criteria with the possible exception of student representation on panels and on the absence of site visits for the accreditation of new programmes. In the view of the Panel the introduction of a student member on the panels for new programmes would strengthen the process.

Appeals against EVA's accreditation recommendations are not permitted under the legislation, but draft reports are sent to the programmes under review for comment on facts, and interviews with programme and EVA staff representatives made it clear to the Panel that EVA acts on the feedback it gets.

The Panel's interviews with representatives of institutions indicated that both the development of the new accreditation system in 2007-08 and its introduction in 2008 were implemented professionally. Consistency of reviews seems to be handled well. The main complaints from both institutions and experts concerned the large amount of material to be produced and read.

Assessment:

The Panel finds that EVA complies fully with Membership Criterion 6.

4.7 MEMBERSHIP CRITERION 7: ESG 3.8 ACCOUNTABILITY PROCEDURES

Standard

Agencies should have in place procedures for their own accountability.

Guidelines

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that
 - the agency's processes and results reflect its mission and goals of quality assurances;
 - the agency has in place, and enforces, a non-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, of some or all of the elements in its quality assurance procedure are subcontracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board; and internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years, which includes a report on its conformity with the membership criteria.

Description:

EVA's quality assurance policy, published on the website specifies objectives and principles for internal quality work. The objectives include ambitions to "highlight whether EVA's activities and results reflect its mission, vision and strategy, assessing progress in EVA's strategic focus areas ... and supply/ing/ measurements which document the quality of EVA's activities for external stakeholders".

Routines with regard to the formal competence of experts are described and assessed in 3.4 Processes fit for purpose, above.

EVA has established a procedure for quality assurance and quality development of accreditation, which includes regular on-line questionnaires to institutions and experts after each round (except in the case of new programmes, where this is done once every year for practical reasons). Internal processes include feedback from evaluation officers, discussions of the process after each round. Results of these measures are used to improve processes and procedures.

Furthermore, in the context of each accreditation round, there are regular meetings between project managers and the Director of Projects to coordinate and exchange information and experiences.

Biannual meetings are held with the Accreditation Council, and the Ministries of Education and Culture to discuss current matters/problems. Informal meetings also take place on an ad hoc basis.

By law, the Accreditation Council supervises the quality of the work of both EVA and Ace Denmark. This concerns above all the quality assurance of reports and some of EVA's procedures. Two reports only have been sent back for clarification of the documentation and evidence used. However, the conclusions in the reports were not altered.

All new staff members follow an introduction course to EVA. Further courses on evaluation methodology are then offered as part of a staff development programme, which, for members of the Department of Higher and Adult Education may encompass evaluation methodology and report writing. Staff are offered ample opportunity to participate in further training of their own choice after consulting with the Head of Department, usually in biannual staff appraisals. Each staff member has a personal development plan which is reviewed annually.

Considerations:

The Panel discussed the internal quality assurance with the staff and management of EVA and reviewed the material presented and is satisfied that there are appropriate processes for internal quality assurance, that they are applied and that measures are taken to improve on the basis of results.

With regard to staff development, there are many openings for staff to participate in appropriate further training. The Panel found, however, that for many staff members there was not enough time for them to avail themselves of these opportunities. EVA might consider ways of dealing with this problem.

Assessment

The Panel finds that EVA complies fully with Membership Criterion 7.

4.8 MEMBERSHIP CRITERION 8: MISCELLANEOUS

- I. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements and decisions are reached in consistent manner, even if the judgements are formed by different groups;
- II. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.
- III. The agency is willing to contribute actively to the aims of ENQA.

Description:

As has been stated above under 3.3 above, EVA's internal quality assurance ensures that processes are monitored consistently. There are regular meetings among those responsible for accreditations to discuss the progress of projects. The matter of consistency was also evidenced in the Panel's interview with experts who affirmed that the staff handled this seriously and guided them through the process. Finally, the

Accreditation Council, which makes the final decisions on accreditations, acts as a watchdog when it comes to quality and consistency of reports.

The Accreditation Act permits appeals “only concerning legal issues regarding the Council's decisions”. Such appeals must be directed to the Danish University and Property Agency. However, in the accreditation process draft reports are submitted to programmes for checking factual accuracy and any errors are promptly corrected in accordance with the Public Administration Act.

EVA has been a member of ENQA since its birth as an association (and also long before that), and the Executive Director of EVA was its first chair. Today, EVA has a seat on the board.

Considerations:

In the Panel's opinion, the evidence demonstrates that EVA meets the various requirements of this criterion. The Panel notes that there are formal procedures of appeal concerning legal issues and of appealing against factual errors in draft reports. The introduction of a procedure to appeal against decisions on other grounds should be considered.

Assessment:

The Panel finds that EVA complies fully with Membership Criterion 8.

5. SOME REFLECTIONS ON EVA AND THE ACCREDITATION SYSTEM

The Panel would like to congratulate EVA on the quality of its work, which to a large extent is due to the dedication of its staff and their professionalism. A good example of EVA's attitude is the seriousness with which it prepared for the ENQA review, with regard to both the self-evaluation process and the site visit.

As is evident from both the self-evaluation report and this report, EVA developed an accreditation model as early as 2003. With the comprehensive changes in EVA's mandate in 2007, codified in the EVA Act and the Accreditation Act, that model was modified to suit the new circumstances, and the first six-year accreditation cycle is now well under way. At the same time, EVA continues to look ahead and is now, for example, working on the development of an institutional audit scheme.

The relationship between the various actors in higher education in Denmark is somewhat complicated. The current accreditation model which has introduced two new players, ACE Denmark and the Accreditation Council, while continuing the Ministries' decision-making roles on the detailed criteria for accreditation has not helped to provide clarity. The Panel believes that some simplification of these arrangements would be beneficial and recommends that the criteria and their further development should be the prerogative of the accreditation agencies. They are the experts using them as tools in their procedures and are capable of seeing what works and what should be changed.

Two other things have struck the Panel. One is the lack of student representatives on the expert panels for accreditation of new programmes and on the Board of EVA. As far as the Panel understands there is nothing in the legislative framework to prevent this and, in the view of the Panel, the inclusion of students would strengthen the processes in a valuable way. Secondly, there is a need for follow-up of accreditations of existing programmes. Many things could change over six years, and even if there is a provision for institutions to ask for a re-accreditation earlier, it is not very likely that that would happen other than in exceptional cases. A "light" follow-up after about three years, which could even be a desk exercise, would also provide useful information on the development of both the programmes and the accreditation system.

These last two paragraphs do not detract from the very positive impression of EVA the Panel gained from its reading of a large number of documents and from its many meetings with management, staff, and various stakeholders.

APPENDICES

APPENDIX 1.

The higher education system in Denmark⁹

With the approval of the Chair of ENQA and the Chair of the review of ACE DENMARK (the Accreditation Institution), whose report was published in the summer of 2010, the following description of higher education in Denmark found in that report is replicated here.

Danish higher education programmes are organised according to a binary division between research-based and professionally based programmes. The purpose of the research-based programmes is to educate students to the highest international standards within and across the research-based disciplines, whereas the purpose of the professionally oriented programmes is to ensure education closely based on practice and at an international level to meet the need for well qualified professionals in the private and public sectors. The Danish higher education programmes fall under the auspices of different ministries. The research-based programmes are offered by eight universities, and regulated by the Ministry of Science in the Danish University Act (Universitetsloven). There are approximately 1,050 study programmes, educating approximately 121,000 students. ACE Denmark is the operator of accreditation of these research-based higher education programmes in the university sector. Following the University Act of 2003, all universities are organised as self-governing institutions funded by the state. In 2007, a merging of several institutions took place and thus reduced the overall number of universities to 8; for example the Royal Veterinary and Agricultural School is now part of University of Copenhagen and the Danish School of Education merged with University of Aarhus. The aim was to create new and stronger universities with better services as part of the Danish government's globalisation strategy. In addition, 3 major new government research institutes have also been established.

The professionally oriented programmes with approximately 83,000 students are predominantly offered by seven University Colleges and ten Academies of Professional Higher Education. Whereas the university programmes are research based, these programmes are based on development and close contact with practice. These programmes and institutions are regulated by the Ministry of Education. The programmes fall under the Danish Act on Academy Profession and Professional Bachelor Programmes (Lov om erhvervsakademi- og professionsbacheloruddannelser). As of January 2008, a merging of the university colleges and centres of higher education (CVU) took place and resulted in 8 new regional university colleges (professionshøjskole). Furthermore 10 new academies of professional higher education (consisting of the existing business and technical colleges) have been established. They offer short-cycle education (KVU) and

9 Parts of this chapter are taken from:
- Eurydice – Eurybase Descriptions of National Education Systems and Policies;
- Accreditation Institution's self evaluation report.

further adult education (VU). The aim of these new structures is to strengthen the development and cooperation of medium- and short-cycle higher education.

A third, and smaller, group of educational programmes fall under the auspices of the Ministry of Culture and encompass educational programmes in the Arts, and provide education for approximately 5,000 students at fifteen institutions. The programmes in the Arts are governed by the Danish Act on Tertiary Artistic Education Institutions under the Auspices of the Ministry of Culture (Lov om videregående kunstneriske uddannelsesinstitutioner under Kulturministeriet) and by the Danish Royal School of Library and Information Science Act (Lov om Danmarks Biblioteksskole). It should be mentioned that specific institutions under the auspices of the Ministry of Culture also offer research-based programmes.

Finally, there are the professionally oriented programmes offered at institutions under the auspices of other ministries, e.g. the Ministry of Defence, the Ministry of Economic and Business Affairs and the Ministry of Justice.

As already mentioned, most Danish institutions of higher education have been merged to form larger units in recent years. This means both that the institutions have been strengthened with more students and a broader provision of study programmes, but also that the administrative systems are undergoing adaptation and development.

The Danish higher education system is organised into four qualification levels, with a number of both ordinary and adult further education degree types at each level. The Danish qualification framework systematically describes the different degree types within the Danish higher education system. Students completing non-university higher education receive a diploma after one to four years. There are a number of medium tertiary (non-university) educations that last three to four years and lead to specialised job-specific qualifications. With the University Reform, the 3+2 structure of 3- year BAs followed by 2-year postgraduate candidate/master programmes has been implemented in all university degrees.

APPENDIX 2.

Site visit programme 23 – 24 November, 2010

23 November 2010

Time	Agenda	Participants
09.00 – 09.15	Arrival and welcome	Agi Csonka, Executive Director Tue Vinther Jørgensen, Director of Projects Katja Munch Thorsen, Director of Projects Maj-Britt Høybye Hansen, Director of Projects Ditte Bergholdt Asmussen, Director of Administration
09.15 – 10.00	EVA Board	Arne Arnth Jensen, Chairman of the Board Eva Hofman-Bang Finn Schumacker
10.15 – 11.00	Accreditation Council	Søren Barlebo Christian Thune
11.15 – 12.00	Principals of Institutions	Harald Mikkelsen Tyge Skovgaard Christensen Ulla Koch Henrik Sveidahl Sven Felding René Larsen
12.00 – 13.00	Lunch	
13.00 – 13.45	Ministries of Education and Culture	Sophus Garfiel Torben Kornbech Rasmussen Per Hansen Frank Rechendorff Møller
14.00 – 14.45	Staff, new programmes	Birgitte Thomsen Christian Moldt Michael Andersen Lluís Armanqué Maria Mogensen Julia Salado-Rasmussen Kirstine Westh Jensen Chritina Laugesen Simon Holmen Clemmensen
15.00 – 15.45	Staff, existing programmes	Inge Enroth Christel Sølvhøj Kirsten Jespersen Thomas Rasmussen Hanne Elsnab Ellen Silleborg Martin Sørensen Morten Brock

24 November 2010

Time	Agenda	Participants
09.00 – 09.45	EVA Management and other relevant staff	Agi Csonka Tue Vinther Jørgensen Anne Kjær Olsen Christian Moldt Inge Enroth Christel Sølvhjem
10.00 – 10.45	Peer experts including students	Ditte Høgsgard Louise Hededal Andersen Kaare Riise Eriksen Poul Windahl Ladekjaer Tue Sanerhage Marianne Skovgaard Hansen Hans Jørgen Lorenzen
11.00 – 11.45	Student Representatives	Line Hjarsø Mette Lundstad Anders Gregers Lind Kresten Bang Heinfelt
12.00 – 12.45	Institutional contact people	Anne-Mette Schirmer Nielsen Kirsten Largren Rasmus Levy Anette Maagaard Per Jensen Anette Bache Hanne Feld
12.45 – 13.15	Lunch	
13.15 – 14.45	Wrap-up meeting	Agi Csonka Tue Vinther-Jørgensen Christian Moldt Anne Kjaer Olsen Inge Enroth Christel Sølvhjem

APPENDIX 3

Terms of Reference for the nationally coordinated external review of the Danish Evaluation Institute (EVA)

1. Background

The Board of the European Association for Quality Assurance in Higher Education (ENQA) decided in September 2006 to re-confirm EVA's Full Membership of ENQA. The re-confirmation was based on an external review of EVA conducted in 2005 and of a supplementary review that looked at EVA's compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) which was completed in 2006.

ENQA's regulations require all full member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions. As a consequence EVA will be subject to a new external review in 2010.

2. Purpose and Scope of the evaluation

The review is coordinated at national level by the Danish Ministry of Education and is a type A review, as defined in the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*. It will evaluate the way in which and to what extent EVA continues to fulfil the criteria for the ENQA membership and thus the ESG. Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether EVA's Full Membership in ENQA should be reconfirmed.

In addition to analysing EVA's compliance with the ENQA membership criteria, and thus with the ESG, the review aims to give background information on the context of EVA's operation, role and tasks. The review will also form the documentation to the Register Committee if EVA subsequently decides to seek inclusion on the European Quality Assurance Register for Higher Education.

3. The Review Process

The process will be designed in the light of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The review will be conducted in English and in accordance with these Terms of Reference which have been drafted by and agreed between EVA and the Coordinating body (The Danish Ministry of Education) and is contained as an annex to the contract between the two. The review will consist of the following steps:

- Nomination and appointment of the review panel;
- Self-evaluation by EVA including the preparation of a self-evaluation report;
- A site visit by the review panel to EVA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the Review Committee of the ENQA Board;

- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency.

3.1 Nomination and appointment of the review team members

The review panel will consist of five members including the Review Chair and the Review Secretary and will be independent of both EVA and the Coordinating body. The roles and responsibility of the panel members are the ones described in chapter 4 of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*

In line with the recommendation of ENQA, the panel will comprise two quality assurance experts from outside the national system being reviewed, a representative of higher education institutions, a stakeholder and a student. One of the panel members will serve as the chair of the review and another as the secretary.

The reviewers will be nominated by the Coordinating body. The nomination of the student member (studying a first cycle degree) will, however, be asked from the European Students' Union (ESU).

The Coordinating body will provide to EVA the list of suggested experts with their respective curricula vitae to establish that there are no known conflicts of interest.

Before recruiting the panel members, the Coordinating body will also submit the panel's composition to the ENQA Board for consideration. The appointment of the review panel will be in accordance with ENQA policy including that the experts will have to sign a non-conflict of interest statement as regards the review of EVA.

3.2 Self-evaluation by EVA, including the preparation of a self-evaluation report

EVA is responsible for the execution and organisation of its own self-evaluation process and will take into account the ENQA's guidance:

- The self-evaluation is organised as a project with a clearly defined schedule and includes relevant stakeholders;
- The self-evaluation report is broken down by the topics of the evaluation: background description of the current situation of the Agency; analysis and appraisal of the current situation; proposals for improvement and measures already planned; a summary of perceived strengths and weaknesses;
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which EVA fulfils its tasks of external quality assurance and meets the criteria for the ENQA membership and thus the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*.
- The report will be submitted to the review panel a minimum of four weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

The review panel will draw up and publish a schedule of the site visit. EVA shall be given at least one month's notice of the site visit schedule in order to properly organise the requested interviews. 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 duration of which will be 2 days.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and EVA.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under the description of the purpose of the review. It will also provide a clear rationale for its findings with regards to each ENQA membership criteria. A draft will be submitted for comment to EVA and the Coordinating body within four weeks of the site visit for comment on factual accuracy. If EVA chooses to provide a 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 EVA, finalise the document and submit it to EVA and ENQA.

The report is to be finalised within two months of the site visit and will not exceed 40 pages in length.

4. Follow-up Process and Publication of the Report

EVA will consider the expert panel's report and inform ENQA of its plans to implement any recommendations contained in the report. Subsequent to the discussion of the evaluation results and any planned implementation measures with ENQA, the review report and the follow-up plans agreed upon will be published on EVA website.

5. Preliminary timetable for the Review

The duration of the evaluation is scheduled to take about 12 months, from April 2010 to April 2011.

Task	Date/deadline
The ENQA Board considers the terms of reference and timetable for the review and the composition of the review panel	April 28 2010
The Coordinating body recruits the members of the review panel	May 2010
EVA starts its self-evaluation process	May 2010
The Review Secretary agrees the site visit schedule with the review Chair and agency	June 2010
EVA submits its self-evaluation report and other relevant material to the Coordinating body to pass it on to the Review Secretary	September/October 2010
The Review Chair and the Review Secretary visit EVA for a pre-meeting with EVA's contact person	October 2010

The review panel visits EVA	November/December 2010
The Review Secretary submits the draft report to EVA and the Coordinating body for comments on its factual accuracy	January/February 2011
EVA submits its comments to the Review Secretary	February/March 2011
The review panel produces a final version of the report	March/April 2011
The Review Secretary submits the final report to EVA and the coordinating body	April 2011
The Coordinating body submits the final report to the ENQA Secretariat	April 2011
Publication of the report by ENQA and EVA	After consideration of the report by the ENQA Board