

The Decision of the Higher Education Assessment Council of the Estonian Quality Agency for Education

Institute of Theology of the Estonian Evangelical Lutheran Church

The Decision on the Fulfilment of the Secondary Condition of Institutional Accreditation

28 January 2026

The Higher Education Assessment Council of the Estonian Quality Agency for Education decided to impose a new secondary condition on the decision of the institutional accreditation of the Institute of Theology of the Estonian Evangelical

In accordance with § 53(3) of the Administrative Procedure Act and based on § 38(3) of the Higher Education Act and clauses 43.2 and 43¹ of the document 'Guidelines for Institutional Accreditation', established on the basis of the authorisation contained in § 24(5) of the Statutes of the Education and Youth Board, the Higher Education Assessment Council of the Estonian Quality Agency for Education (hereinafter the Council) states the following:

1. In accordance with § 53(1)(2) of the Administrative Procedure Act, a secondary condition of an administrative decision is an additional duty related to the principal regulation of the administrative decision, and § 53(2)(2) and (3) of the same Act establish that a secondary condition may be imposed on an administrative decision if the administrative decision cannot be issued without the secondary condition or if issue of the administrative decision must be resolved on the basis of the administrative right of discretion. On 29 June 2023, the Higher Education Assessment Council of the Estonian Quality Agency for Education (hereinafter the Council) adopted a decision to approve the assessment report¹ and to conduct the next institutional accreditation of the Institute of Theology of EELC (hereinafter the Institute) in 7 years with a secondary condition that the Institute submits a report to the Council by 29 June 2025, at the latest, on the elimination of the deficiencies listed in clause 11.2 of the assessment decision².

¹ The assessment report is an integral part of the decision and is available on the HAKA website.

² The assessment decision is available on the HAKA website.



2. On 19 June 2025, the Institute submitted the following documents to the Council: (1) Overview of Follow-Up Actions in the Areas for Improvement Identified During the 2023 Institutional Accreditation; (2) Overview of Measures Taken to Address the Main Shortcomings Identified during the 2023 Institutional Accreditation; (3) Guidance Material for the Lecturers and Students of the IT of the EELC How to Use Artificial Intelligence in the Educational Process; (4) Research and Teaching Skills Development Plan for Academic Staff of the Institute of Theology of the Estonian Evangelical Lutheran Church; (5) The Faculty of Theology of the Institute of Theology of the Estonian Evangelical Lutheran Church Guidelines for Research Ethics and Personal Data Protection in Graduate Papers; (6) Quality Management System in the Institute of Theology of the EELC; (7) Action Plan for 2022-2026 in Support of the Strategic Plan of the Institute of Theology of EELC:
3. HAKA involved the following members of the institutional accreditation expert panel in the assessment of the fulfilment of the secondary condition:

Joke van Saane	Rector, University of Humanistic Studies, Netherlands
David Shepherd	Assistant Professor, Dean of Undergraduate Studies, Trinity College, Ireland

4. HAKA sent the preliminary report to the institution on 5 November 2025, to which the Institution responded on 13 November 2025. On 14 November 2025, the expert panel submitted a report to HAKA on the elimination of the deficiencies described in clause 11.2 of the Council's decision of 29 June 2023.
5. The Council discussed the report at its meeting on 5 December 2025 and decided to send the assessment report back to the panel to align the analysis text and the assessment of the first secondary condition. HAKA sent the revised report to the institution again on 10 December 2025, to which the Institution responded on 16 December 2025. On 17 December 2025, the expert panel submitted a report to HAKA on the elimination of the deficiencies described in clause 11.2 of the Council's decision of 29 June 2023. The assessment was as follows:

Deficiency forming the basis for the secondary condition	Assessment: The deficiency is partially eliminated
Shortcomings concerning strategic management: The goals and targets in the Institute's development plan and action plan are not specific enough. Therefore, it is not possible to systematically assess the achievement of the goals. It is necessary to formulate specific goals that allow for the assessment of their achievement. A responsible person	<u>Areas for improvement and recommendations</u> 1) The goals of the development plan have remained the same and still lack precision. It is strongly recommended to formulate specific and measurable goals. This is necessary not only for monitoring and management processes but also to avoid giving staff responsibility for activities without clear criteria.

must be assigned for each goal and activity.	
Deficiency forming the basis for the secondary condition	Assessment: The deficiency is fully eliminated
Shortcomings concerning academic ethics: The Institution lacks its own regulations on academic ethics. These must be developed. There is also no body to monitor compliance with the recently signed Agreement on Good Research Practice.	<u>Areas for improvement and recommendations</u> 1) It is important that the Institute also has guidelines for research ethics and personal data protection. It is recommended to amend the guidelines for ethical approval of student research so that they also apply to academic staff or to develop corresponding separate guidelines. <u>Further development opportunities</u> 1) It is recommended to create a separate place on the Institute's website for documents related to academic ethics, not limited only to the Good Research Practice document. 2) It is recommended to more clearly stipulate, e.g. cases of possible 'whistleblowing' in the guidelines of the ethics committee.

6. In accordance with § 53(1)(2) of the Administrative Procedure Act, a secondary condition of an administrative act is an additional duty related to the principal regulation of the administrative decision, and based on § 53(1)(3) of the same Act, a supplementary condition for the creation of a right arising from the principal regulation of the administrative decision. In accordance with § 53(2)(2) and (3) of the Administrative Procedure Act, a secondary condition may be imposed on an administrative decision if the administrative decision cannot be issued without the secondary condition or if issue of the administrative decision must be resolved on the basis of the administrative right of discretion.

7. Considering that one deficiency forming the basis for the secondary condition has been partially and one deficiency fully eliminated, the Council

decided to impose a new secondary condition on the decision of the institutional accreditation of the Institute of Theology of the Estonian Evangelical Lutheran Church adopted on 29 June 2023:

the Institute shall submit an overview by 28 January 2027, at the latest, on the elimination of shortcomings in strategic management. The goals and targets in the Institute's development plan and action plan are not specific enough. Therefore, it is not possible to systematically assess the achievement of the goals. In the new development plan, it is necessary to formulate specific goals

that allow for the assessment of their achievement. A responsible person must be assigned for each goal and activity.

Members of the expert panel shall be involved in the assessment of the fulfilment of the secondary condition.

The decision was adopted with 11 votes in favour. 0 were against.

8. If the Institute of Theology of the Estonian Evangelical Lutheran Church does not fulfil the secondary condition by the deadline, the Council shall revoke the accreditation decision or establish a new secondary condition.

9. A person who finds that the decision of the Assessment Council violates their rights or restricts their freedoms may file a challenge in the manner prescribed by the Administrative Procedure Act. The appeal shall be submitted to the HAKA Assessment Council within 30 days after becoming aware, or when they should have become aware, of the contested action. The Council forwards the appeal to the HAKA Appeals Committee, which, within 5 days of receiving the appeal, submits a written impartial opinion to the Council on the validity of the appeal. The Council resolves the appeal within 10 days of its receipt, taking into account the reasoned position of the Appeals Committee. If further examination of the challenge is necessary, the Assessment Council may extend the deadline for examining the challenge by up to 30 days.

Hillar Bauman

Secretary of the Council