

Board of ENQA  
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20 April 2015

***Progress Report Regarding External Review of EKKA***

Dear Colleagues,

Since the external review of EKKA, which took place in 2012, we have carefully considered the recommendations made by the review panel to our Agency, called now the Estonian Quality Agency for Vocational and Higher Education since the 2<sup>nd</sup> of April 2015.

Although most criteria of ESG were found to be fully compliant by the review panel, we have, nonetheless, presented below recommendations extracted from the panel's report as well as those highlighted by ENQA Board, and we are pleased to report about the changes and improvements that have been implemented in EKKA during the past couple of years.

**1. ESG 2.3 Criteria for decisions – Substantial compliance**  
**ESG 3.7 External quality assurance criteria and processes – Full Compliance**

**ENQA's recommendations:** Clear decision-making criteria should be identified for both transitional re-evaluations and assessments of study programme groups in the first and second cycle of higher education. This is to increase transparency of EKKA decision-making procedures and to secure interests of learners. The Agency should investigate how to increase transparency into the processes of transitional evaluation and re-evaluation, and initial assessment of study programme groups in first and second cycles in higher education in order to secure fair competition conditions and information provision among education providers.

**EKKA's comment:** EKKA decided to take the recommendations partly into account:

- a) As a general note, it has been EKKA's conscious choice to keep the decision-making processes flexible with regard to transitional re-evaluation and assessment of study program groups, thus providing the Council with a certain right of discretion in a prescribed framework. As the Review Panel has also pointed out in section 262 of the report, such an approach should guarantee that the Council does not rubber-stamp

the decisions of the assessment committees but follows its own independent discussion and decision. It is presupposed that the Council has to exercise this right of discretion in accordance with the limits of authorization, the purpose of discretion and the general principles of justice, taking into account relevant facts and considering legitimate interests as prescribed by the Administrative Procedure Act. The Council has always an obligation to weigh the relevant strengths and areas of improvement and present the considerations from which it has proceeded upon issuing a certain decision.

- b) Until recently, the regulation for transitional re-evaluation stipulated that it was possible for the Quality Assessment Council to make a proposal to the Minister of Education and Research to grant the educational institution the right to conduct studies in the study program group for indefinite period of time even in cases where two out of three component assessments were „partially conforms to a required standard“. This opportunity was never used by the Council and it would probably not have been appropriate to do so. At its session on 4 June 2013, the Council decided to modify the *Requirements and Procedure for Transitional Evaluation and Re-evaluation of Study Program Groups*, eliminating such a possibility from the regulation. A clause was added to the document, stating that if two component assessments are partially confirming to a required standard, the institution can only be granted a right to conduct studies for a limited time period (from one to three years).
- c) The assessment of study program groups is mainly aimed at improvement and therefore requires a more dynamic and context sensitive approach, and EKKA has found it important to restrict this discretionary power as little as possible with its regulations. Therefore, the main criteria for the decision is whether the Council, as a result of weighing strengths and areas of improvement, finds any lack of conformity of the study programs, instruction or instruction-based development to legislation, national or international standards. If such lack of conformity is found, the Council points it out in the decision and subsequently decides that the next assessment will take place in less than seven years. Whether it will be one or six years depends on the relevance of the deficiency which also has to be clearly reasoned, and the Council is expected to be consistent in these decisions as well. If no such deficiencies are found, the Council will decide to carry out the next assessment in seven years. In order to better structure the Council's space for discretion, updates have been planned in the EKKA regulation *Quality Assessment of Study Program Groups in the First and Second Cycles of Higher Education*.

## 2. ESG 2.5 Reporting – Substantial compliance

**ENQA's recommendations:** Information provision, and its transparency, could be improved through cooperation with other structures and agencies in Estonia, but most importantly, with stakeholders themselves. The Agency should ensure the reports reach the intended readership and that the information provided reach local audiences and is sufficient for international partners. Therefore, user-friendliness of EKKA database with assessment decisions and expert reports should be improved. Institutional accreditation policies should be clarified as to what, why and how has to be made public in relation to external quality assurance procedures. EKKA should address Estonian and English language usage in both institutional self-analyses and evaluation reports. Some agencies have found it useful to develop a label that both the agency and institutions should put on their front page, and that could be used at national websites, with a link leading to all information about accreditation and quality assurance, at different levels; such a link or a label (logo) could be visible from all parts of the HEI website. Information on accreditation process and results in VET should be available on the EKKA website in English.

**EKKA's comment:** EKKA has systematically taken into account the needs of different target groups. For example, in the cases of institutional accreditation and the quality assessment of study program groups, a summary report is available alongside the comprehensive assessment report (i.e., the decision of the Council is in a reader-friendly format); the assessment reports are shown on a separate site, although they are also available in the database.

We are glad to report that in 2014 EKKA launched a [new website](#) with a new design and structure. We have also developed a new database, which contains assessment decisions and reports of both higher education and VET; it is now more customer-friendly and the assessment results are more easily accessible. We are currently in the process of making the last improvements before launching it. The database is at the present time only in Estonian, but we are intending to develop it also in English. At the moment, the English website conveys information about [institutional accreditation reports and decisions](#) and [quality assessment reports and decisions](#).

In addition, we have developed [a separate database for study programmes in higher education](#), which is targeted especially for those who want to get an overview of all the study programmes taught in higher education institutions across Estonia; this database has links to decisions of quality assessment of study programme groups as well as decisions about institutional accreditations. It is both in Estonian and English.

In June 2014, EKKA Quality Assessment Council adopted a statute for the usage of [EKKA Quality Label](#), which is awarded to higher education institutions that have been accredited for 7 years. The accredited institutions can exhibit the label on their website and link it to the accreditation report and decision (*for example, see the front page of the Estonian University of Life Sciences*

<https://www.emu.ee>). However, it is not an obligation for the institution but rather a possibility.

We have discussed, once again, whether in case of institutional accreditation the self-evaluation reports of higher education institutions must be always made public in full. We are of the opinion that they can either be made public in full, or partly if this is the grounded wish of the institution. If the report is publicised only partly, it will be indicated so on EKKA's website. So far, all self-evaluation reports have been publicised in full.

Regarding the institutional self-evaluation reports and assessment reports, which are currently only in English but according to the panel's opinion could be considered translating into Estonian for the local audience: EKKA has decided to take the recommendation partly into account. We consider the translation of the self-evaluation reports and assessment reports into Estonian extremely resource-consuming, in both time wise and financially. Thus, we do not consider it appropriate and necessary to make the translation of all self-analysis and assessment reports from English into Estonian and vice versa. However, EKKA Assessment Council adopted a decision to continue to translate all assessment decisions (which is essentially the Summary Report) from Estonian into English and publish them on the English site.

As for the accreditation process and decisions in VET in English:

A separate page in English introduces the [accreditation of curriculum groups in vocational education and training](#) and also features the [accreditation procedure in VET](#). We do not see any reason for translating self-evaluation reports, expert reports and Council decisions in VET into English, because all accreditations in VET are only conducted in Estonian. These materials are very extensive and translation expensive. The main audience for the decisions and reports are Estonians. In higher education, the potential target audience would be a person who wishes to enter a higher education institution in Estonia; in vocational education, there is no possibility to conduct studies in English or other foreign language. EKKA's decision is to keep the international public informed through periodical analyses of evaluation results in VET (see [periodical analyses for 2014](#)), which are translated into English. Thus, we have decided to summarise the results of VET accreditation and make them available in English [on the English website](#), and we have done this only since 2014 when accreditation of curriculum groups in VET became legitimate. In addition to these summaries we are planning to prepare a detailed table with accreditation results by VET institutions and curriculum groups in English.

### 3. ESG 2.6 follow-up procedures - Full compliance

**ENQA's recommendations:** It is recommended as a good practice that higher education institutions make their improvement oriented measures known to the target audiences, as this increases public accountability and awareness, and also contributes towards the organizational

culture of continuous development. These measures as well could be made public via EKKA website, to complement assessment committee reports and EKKA Council decisions.

**EKKA's comment:** We agree that higher institutions should take measures in order to increase the transparency of how assessment committee's recommendations have been taken into account. We expect institutions to include the committee's recommendations into their regular development activities and development plans and do not see a need for a special document compiled for EKKA and published on EKKA's website.

Nevertheless, to be able to assess the possible impact of external evaluations conducted by EKKA we are using different tools. In case of quality assessment of study program groups, the institutions are asked to write a short back-report to EKKA's council one year after the assessment decision is made. In case of institutional accreditations, we have introduced feedback seminars where the institutions are asked to reflect on the recommendations given by the committee and on the impact of the whole accreditation process.

As a follow-up activity, in December 2014 EKKA organized a workshop where the higher education institutions who had undergone institutional accreditation presented their best practices, introduced their planned activities based on the results and recommendations presented in the assessment reports, and got feedback from EKKA as well as other higher education institutions. An overview of the key issues discussed during the workshop can be found under the following link in Estonian: <http://ekka.archimedes.ee/institutsionaalse-akrediteerimise-jarelseminar/>.

In March 2015, after completing the first round of follow-up activities of institutional accreditation and analysing the results, EKKA decided to introduce a change in its regulations. Hereinafter, EKKA will make a proposition to the HEIs to submit two years after the institutional accreditation a written overview regarding the planned and implemented activities deriving from the proposals in the assessment report, and their outcomes. EKKA will then draw up a summary of the overviews presented, which will be made available on EKKA's website. Based on these summaries, occasional seminars will be organised by the Agency for the institutions to create a platform for discussion and sharing best practices.

#### **4. ESG 3.2: Official Status – Full compliance**

**ENQA's recommendations:** This legal framework when EKKA is judging whether to conduct an assessment itself or let a foreign agency do the job, can be seen as potentially leading towards the conflict of interests, and creating unnecessary tensions between the local and a foreign agency. Higher education institutions are not prevented from choice, but could be effectively discouraged in the fear of being perceived as not loyal towards the national quality assurance

agency. Therefore, we recommend that the Minister gives consideration to assigning to an external independent body responsibility for the decision as to whether a review be carried out by EKKA or by a foreign agency.

**EKKA's comment:** EKKA has informed the Ministry of Education and Research of this recommendation. The opinion of the Ministry was that, at the moment, the EKKA Assessment Council has an exclusive competence to decide and evaluate whether the foreign agency meets the requirements set out in our regulations.

Currently, the criteria upon which the Assessment Council bases its decision whether or not the foreign agency will be allowed to conduct the evaluations, is strictly objective. This should ensure that the subjectivity of the Council, and thus the possibility of a conflict of interest regarding this matter, is minimized. The main condition is that the results of the assessment allow the Council to adopt a decision compatible with Estonian legislation.

At the moment, a request has been submitted to the EKKA Quality Assessment Council to involve a competent foreign authority in the assessment of the veterinary study program group. The Council has analysed the objective criteria and accepted this request. This assessment shall be carried out in autumn 2015.

## **5. ESG 3.4 Resources – Full compliance**

**ENQA's recommendation:** In the Development Plan EKKA sets targets for international recognition, among other, to be included in the development projects for the quality systems of third countries. It is advised to consider possibilities take lead in coordination or be more involved in partnerships in other type international cooperation projects in the field of quality assurance, e.g. via networks EKKA is a member.

**EKKA's comment:** During the past couple of years, EKKA has increased its collaboration with other quality assurance agencies, its participation in various working groups, international projects, and networks. The following are some examples:

- In partnership with ENQA, the Swiss Center of Accreditation and Quality Assurance in higher education (OAQ), the Quality and Qualifications Ireland (QQI), the Agency for Science and Higher Education (ASHE), EKKA staff participated in ENQA working group "Transparency of European higher education through public quality assurance reports" (EQArep) during 2013-2014. EKKA published the results of the survey on the use and usefulness of external quality assurance reports for different stakeholders.

- At the beginning of 2014, Mr. Hillar Bauman, Evaluation Expert in EKKA, was elected on the Accreditation Council of the National Centre for Public Accreditation in Russia and participates regularly in the process of making accreditation decisions of the Council.
- In the first half of 2014, Dr. Heli Mattisen, Director of EKKA, participated in development of Ukrainian higher education act. On 1 July 2014, the Ukrainian parliament adopted a higher education act which had involved external experts in its development. The comments and suggestions of EKKA were taken into account in the act with regard to principles of ensuring the quality of higher education and creating a higher education quality agency.
- EKKA hosted and organised INQAHE Forum 2014 in Tallinn on 26 – 28 May 2014.
- During September 2014 to May 2015, EKKA is implementing a project on creation and capacity building of quality assurance agency for professional education in the Republic of Moldova. The project is funded by the Estonian Ministry of Foreign Affairs in the framework of Estonian development cooperation and humanitarian aid.
- In September 2014, EKKA in partnership with the Finnish Education Evaluation Centre won the competition for a new Twinning project to further develop higher education in Azerbaijan. The overall objective of this project is to support the development of higher education in Azerbaijan in accordance with the principles of the European Higher Education Area. In the spring of 2015, a detailed action plan for the two-year period will be developed in collaboration with Azerbaijani project partners. The project will be launched in autumn 2015.
- In September 2014, yet other Twinning project, led by Finland, was launched in Armenia. EKKA staff participate as experts in the project.
- The Estonian Higher Education Quality Agency (EKKA) won the public procurement of the Ministry of Education in Moldova to conduct the assessment of study programmes in Law in Moldova. During 2015, 25 study programmes in 12 different higher education institutions will be accredited.
- EKKA continues to participate in EQAVET network. Marge Kroonmäe, Evaluation Expert for VET in EKKA, was appointed as a member of one of the EQAVET working groups “The quality assurance approach in adult learning in the context of Continuing VET” for the new period.
- Dr. Maiki Udam, Director of Development and International Cooperation in EKKA, was elected to the Accreditation Council of the Independent Kazakhstan Quality Assurance Agency in Education (IQAA) on 8 November 2014.
- Dr. Maiki Udam was elected on INQAHE Board in February 2015.

## 6. ESG 3.6 Independence - Full Compliance

**ENQA's recommendations:** The Review Panel took notice of only one woman between the EKKA Quality Assessment Council members. However, there is nothing in the EKKA Council formation procedure or on institutional levels that would prevent from seeking a more gender-balanced representation among the suitable candidates. Therefore, it is suggested to address the gender issue upon the expiry of current membership terms.

The EKKA Council formation procedure foresees that a service term is three years, and no person may be a member of the Council for more than six years. It is encouraged to think of introducing rotation terms or other comparable measures assuring that on the Council at any given moment there is a proper balance of new and more experienced members, assuring smooth execution of their duties.

**EKKA's comment:** EKKA has taken the recommendation regarding rotation into account and has introduced a set of principles into *the Procedure for Formation of the Estonian Higher Education Quality Assessment Council* that should be taken into account by the Council of Archimedes Foundation during the selection process of the EKKA Council members. These principles include:

- The application of the rotation system of the EKKA Council members. According to the system, as a result of the re-election, at least 1/3 of the council members should continue their work in the Council, and at least 1/3 of the members should be replaced.
- The representation of different types of higher education institutions as well as students and employers in the EKKA Council.
- Ensuring and maintaining gender balance in the Council (however, we do not deem rational to provide specific gender quotas.)

These principles are scheduled to be formally approved by the Council of Foundation Archimedes in June, 2015.

Although the process of amending the regulation concerning the formation of the EKKA Council is still pending, the above-mentioned principles have already been applied in practice. For example, in February 2015, new EKKA Council was elected, in which the gender balance has been achieved compared to the previous composition of the council (6 members out of 13 are now female) and 1/3 of previous council members has been re-elected



## 7. ESG 3.8 Accountability – Full Compliance

**ENQA's recommendation:** Expert reports, as published by EKKA, could contribute more towards transparency how conflicts of interest are avoided. Although EKKA provides on its website CVs of experts who served, e.g. for institutional accreditation, on the expert reports, review team members are only listed, with no information about their background or representation, which makes it difficult for the general public to assess how EKKA follows the principles in forming the assessment committees.

**EKKA's comment:** We have now clearly indicated the background of experts, who are involved in assessment committees, adding information about their work place and position and, thus, increasing the transparency of how experts are selected and that there is no conflict of interest. This background information about members of assessment committees is available both on the website, where CVs of committee members can be accessed, and in the assessment reports. We have implemented this practise throughout various assessments.

For any further questions that you may have, please do not hesitate to contact us.

Sincerely,



Heli Mattisen  
Director