

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

## Estonian Free Church Theological Seminary Institutional Accreditation Decision

01.07.2025

The Higher Education Assessment Council of the Estonian Quality Agency for Education decided to accredit the Estonian Free Church Theological Seminary for seven years with a secondary condition.

In accordance with § 38(3) of the Higher Education Act and clause 43.2 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 HAKA (hereinafter the Council) states the following:

1. The Estonian Free Church Theological Seminary (hereinafter KUS or the Institution) coordinated the period of institutional accreditation with HAKA on 24 May 2024.
2. By the order of 11 June 2024, the Director of HAKA confirmed the expert panel (hereinafter the panel) consisting of:

<b>Maarja Beerkens</b> (Chair)	Vice Dean for Education, Associate Professor, Leiden University, Netherlands
<b>Matthew Kitching</b> (Secretary)	PhD student, Lancaster University, United Kingdom
<b>Joke Van Saane</b>	Rector, University of Humanistic Studies, Netherlands
<b>Priit Rohtmets</b>	Associate Professor, Vice Head of the School of Theology and Religious Studies, University of Tartu; Professor, Institute of Theology of the Estonian Evangelical Lutheran Church, Estonia
<b>Ringo Ringvee</b>	Advisor, Ministry of the Interior, Estonia

3. KUS submitted the self-evaluation report to the HAKA Bureau on 16 January 2025; the HAKA assessment coordinator sent the self-evaluation report to the panel on 20 January 2025.
4. The assessment visit to KUS took place from 17–18 March 2025.
5. The panel sent the draft assessment report to the HAKA Bureau on 9 May 2025; HAKA forwarded the draft assessment report to the Institution for comments on 9 May 2025, and KUS submitted its comments on 22 May 2025.



6. The panel submitted its final assessment report to the HAKA Bureau on 1 June 2025. The assessment report is an integral part of the decision. The report is available on the HAKA website.
7. The Secretary of the Council forwarded the final assessment report and the self-evaluation report to the members of the Council on 16 June 2025.
8. The panel's assessments were as follows:

<b>Standard</b>	<b>Assessment</b>
STRATEGIC MANAGEMENT	Conforms to requirements
Resources	Conforms to requirements
Quality culture	Conforms to requirements
Academic ethics	Conforms to requirements
Internationalisation	Conforms to requirements
Teaching staff	Conforms to requirements
Study programme	Conforms to requirements
Learning and teaching	Conforms to requirements
Assessment of students	Partially conforms to requirements
Learning support systems	Conforms to requirements
Research, development and/or other creative activities	Conforms to requirements
Service to society	Conforms to requirements

★ **According to the panel, the following deserves recognition**

According to the expert panel, the Institution's outstandingly learner-centred approach, which includes community-based individual mentors and academic group mentors and effectively supports the holistic (spiritual, professional, personal) development of students, is worthy of recognition.

9. The Council discussed the submitted documents at its meeting on 1 July 2025 with 11 members participating and decided to highlight the following strengths<sup>1</sup>, areas for improvement and recommendations<sup>2</sup>, and proposals for further development<sup>3</sup> from the assessment report.

## 9.1 STRATEGIC MANAGEMENT

### Strengths

1. Both students and staff are highly committed to the Institution and highly value its informal and Christian culture.

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<sup>1</sup> Achievements exceeding the level of the standard (not compliance with the standard) are highlighted as strengths.

<sup>2</sup> Areas for improvement and recommendations refer to deficiencies in meeting the requirements of the institutional accreditation standard and influence the formation of the Council's final decision.

<sup>3</sup> Proposals for further development are suggestions for improvement that do not include a reference to non-compliance with the standard and the consideration or non-consideration of which is at the discretion of the institution. Proposals for further development do not influence the formation of the Council's final decision.

2. In recent years, KUS has taken a significant step towards professionalising and formalising processes and policies in relevant documents.

#### Areas of concern and recommendations

1. The Rector has a central role in the Institution and many areas of responsibility at both strategic and operational levels. Therefore, it is recommended to continue developing the roles of KUS management, including lead lecturers and the Academic Dean, to mitigate risks associated with over-reliance on the Rector. It is recommended to create an Academic Council with clearly defined tasks, specific membership, clear mandates for making certain academic and student-related decisions, and clear decision-making procedures.
2. The academic autonomy of KUS is not formally guaranteed, given the composition of the Advisory Board and the role of the Board of Elders. The owner, i.e. the ECB Union, who is also the Rector's employer, prevails in the composition of the Advisory Board and the Board of Elders. This creates a situation where the balance between the Institution's governing bodies and academic management is not clear. The Rector has a very central role at both strategic and operational levels, which may cause management decisions to depend too much on one individual rather than collective academic management. An appropriate balance must be ensured between the role of the Advisory Board and internal academic oversight, based on written agreements set out in the Institution's management framework.
3. When formulating objectives, efforts should be made to ensure they are specific, measurable, achievable, relevant, and time-bound (SMART), which would allow for better monitoring and evaluation of progress.

#### Opportunities for further improvement

1. KUS currently maintains contact with alumni in a simple manner using email addresses. Therefore, it is recommended to create more permanent and clearer ways to activate the alumni network.

## **9.2 RESOURCES**

#### Strengths

1. A system of shared financial responsibility has been implemented.
2. The teaching facilities are of high quality and thus provide a supportive learning environment for students.

#### Opportunities for further improvement

1. Efforts should be made to ensure online access to learning resources, including databases, for both students and staff.

## **9.3 QUALITY CULTURE**

### Strengths

1. The Institution has an effective system for collecting regular feedback from various stakeholders (students, alumni, community).
2. The Institution has a strong culture of collecting personal and informal feedback (in addition to surveys), for example, through exit interviews with students and the mentoring system.

### Opportunities for further improvement

1. The strong feedback culture needs to be better balanced with a formal academic decision-making body responsible for the regular and thorough review of the study programme, making relevant proposals, and monitoring compliance with general academic standards. While activities take place, they are usually informal and Rector-centric. The group of lead lecturers, currently acting as the Rector's mouthpiece in academic matters, is a good foundation for creating such a body.
2. In order to ensure study programme coherence, the practice where lecturers regularly review their colleagues' syllabi must be continued.

## **9.4 ACADEMIC ETHICS**

### Areas of concern and recommendations

1. Currently, only Master's theses are checked for potential plagiarism. To ensure academic integrity and maintain educational quality standards, it is recommended to establish a procedure under which all student work is checked for plagiarism.
2. The use of artificial intelligence among students and staff is common, but KUS has not yet developed clear guidelines in this regard. The Institution must accelerate the development of regulations for the use of AI.

### Opportunities for further improvement

1. The informal culture resulting from the small size of the Institution poses a certain risk in reporting cases of academic misconduct. Therefore, a general anonymous channel for reporting misconduct must be established.
2. The Institution's procedures for resolving appeals (for example, appeals concerning grades or plagiarism) should be documented in writing and systematised. While it is clear that the Academic Dean is the contact point for students in such cases, it remains unclear which body has the right to make the final decision. The previously proposed Academic Council could be well-suited for making such decisions.

## **9.5 INTERNATIONALISATION**

### Opportunities for further improvement

1. Given that an increasing number of courses are conducted in English, efforts should be made to involve more international students. This would also benefit local students.

2. The Institution's concept of internationalisation should be supplemented with internationalisation at home and in the study programme. The international experience of local lecturers could be better utilised and more international discussions and topics could be introduced to students within courses. International networks could also be introduced to students.

## **9.6 TEACHING STAFF**

### Areas of concern and recommendations

1. The Institution has limited opportunities for recruiting suitable and qualified academic staff. Therefore, it is important to pay attention to staff development and succession planning. A clear career model must be created and evaluation must be documented in accordance with KUS academic positions.

#### Opportunities for further improvement

1. It should be ensured that new lecturers (including Master's and PhD students) are consistently supervised by experienced colleagues and have also received pedagogical training.
2. Communication with visiting lecturers should be continually improved to ensure their more effective contribution to the delivery of the study programme.

### **9.7 STUDY PROGRAMME**

#### Strengths

1. Study programme development primarily takes into account the principles of learner-centred learning and the needs of various stakeholders.

#### Areas of concern and recommendations

1. There is a high proportion of courses with a volume of less than 3 ECTS in the study programmes. Small-volume courses must be integrated into larger ones for better study programme coherence.

#### Opportunities for further improvement

1. The Master's programme is practical and problem-based. However, some students wish to pursue an academic career. To facilitate their admission to doctoral studies, methodological and research courses could be added to the study programme.
2. Consideration could be given to adding an elective course to the Master's programme to provide students with practical experience as a pastor.

### **9.8 LEARNING AND TEACHING**

#### Strengths

1. Recording lectures is helpful for those students who cannot attend classes for personal reasons or for whom Estonian is a second language.
2. The study programme is well-structured. Classroom, online, and independent learning are in good balance, which is well-suited for a student body located across the country.

#### Areas of concern and recommendations

1. The lenient admission policy of KUS encourages high dropout rates, prolongation of study time, and a great need for various support from lecturers and the support structure. Therefore, upon admission, it is necessary to remain firm in following the published admission criteria and to admit only those students who have sufficient potential to complete the study programme.



#### Opportunities for further improvement

1. Efforts should be made to find a better balance between a supportive learning environment and developing students into self-directed learners. It is recommended to set and apply boundaries concerning the making of exceptions. The KUS position not to be lenient concerning the extension of deadlines is welcomed.
2. Consideration could be given to providing pre-admission preparation for those potential students who may have some deficiencies in the competences necessary for studying in the programme (for example, Bible school, Estonian or English language training).

### **9.9 ASSESSMENT OF STUDENTS**

#### Areas of concern and recommendations

1. Assessment depends almost entirely on individual lecturers and there is insufficient oversight at the study programme and institutional levels. Therefore, it is recommended to implement the following measures:
  - A clear and justified decision on which courses use differentiated and which use non-differentiated assessment;
  - Implement comparative analysis of grades and results, (random) peer review of assessments or joint discussions to harmonise assessment practices and ensure comparability and fairness of assessments;
  - Transparent principles and conditions for students for resit exams, ensuring that the same standards are applied to all students. It must also be ensured that students are assessed based on their achieved learning outcomes.

#### Opportunities for further improvement

1. Clear deadlines for posting grades must be established and it must be ensured that students receive timely feedback on their written work.
2. The procedure for appealing grades should be described in more detail.

### **9.10 LEARNING SUPPORT SYSTEMS**

#### Strengths

1. According to the expert panel, the Institution's outstandingly learner-centred approach, which includes community-based individual mentors and academic group mentors and effectively supports the holistic (spiritual, professional, personal) development of students, is worthy of recognition.

#### Opportunities for further improvement

1. Career counselling could be strengthened for those students who plan their future careers outside the church.

2. Support procedures for students with special needs (including learning-related) should be more clearly defined.
3. Create regular and effective systems for collecting timely feedback on student support measures.

## **9.11 RESEARCH, DEVELOPMENT AND/OR CREATIVE ACTIVITIES**

### Strengths

1. Management is committed to strengthening the research culture in the Institution. Publishing in international research journals is encouraged by management and is rewarded with a financial bonus.

### Opportunities for further improvement

1. It should be ensured that academic staff align their research more with the KUS research plan.
2. It is recommended to more actively identify stakeholder needs to shape KUS research priorities and gain inspiration for research ideas.
3. KUS international connections should be utilised and more research applications should be submitted as a member of various consortia.

## **9.12 SERVICE TO SOCIETY**

### Strengths

1. KUS provides various services to society. One side is serving the religious community through higher theological education. The other side consists of services that KUS, together with its alumni, offers to the wider society. The Institution's ethos is crucial in this.
10. If one to four sub-assessments are 'partially conforms' and the remaining sub-assessments are 'conforms', the Assessment Council analyses the strengths and areas for improvement of the institution and provides an assessment that the management, administration, study and research activities, and the study and research environment of the institution conform to the requirements and makes a decision to accredit the institution for seven years, or provides an assessment that there are deficiencies in the management, administration, study and research activities, or the study and research environment of the institution, provides instructions for their elimination and makes a decision to accredit the institution for three years.
11. The Council analysed the strengths and areas for improvement of KUS and considered it necessary to highlight the following:

**11.1. The Institution is characterised by a number of significant strengths:**

According to the expert panel, the Institution's outstandingly learner-centred approach, which includes community-based individual mentors and academic group mentors and effectively supports the holistic (spiritual, professional, personal) development of students, is worthy of recognition. Both students and staff are highly committed to the Institution and highly value its informal and Christian culture. The teaching facilities are of high quality and thus provide a supportive learning environment for students. Study programme development primarily takes into account the principles of learner-centred learning and the needs of various stakeholders. KUS provides various services to society. One side is serving the religious community through higher theological education. The other side consists of services that KUS, together with its alumni, offers to the wider society.

**11.2. The deficiencies of the Institution are mainly related to two areas:**

- **Deficiencies related to the assessment of students:** Assessment depends almost entirely on individual lecturers and there is insufficient oversight at the study programme and institutional levels. Therefore, it is recommended to implement the following measures: A clear and justified decision on which courses use differentiated and which use non-differentiated assessment; Implement comparative analysis of grades and results, (random) peer review of assessments or joint discussions to harmonise assessment practices and ensure comparability and fairness of assessments; Transparent principles and conditions for students for resit exams, ensuring that the same standards are applied to all students. It must also be ensured that students are assessed based on their achieved learning outcomes.
- **Deficiencies related to strategic management:** The academic autonomy of KUS is not formally guaranteed, given the composition of the Advisory Board and the role of the Board of Elders. The Rector has a very central role at both strategic and operational levels, which may cause management decisions to depend too much on one individual rather than collective academic management. It is recommended to create an Academic Council with clearly defined tasks, specific membership, clear mandates for making certain academic and student-related decisions, and clear decision-making procedures. When formulating objectives, efforts should be made to ensure they are specific, measurable, achievable, relevant, and time-bound (SMART), which would allow for better monitoring and evaluation of progress.

12. In accordance with § 53(1)(2) of the Administrative Procedure Act, a secondary condition to an administrative act is an additional obligation related to the main regulation of the administrative act, and according to clause 3, also an additional condition for the creation of a right arising from the main regulation of the administrative act. § 53(2)(2) and (3) of the Administrative Procedure Act provide that a secondary condition may be imposed on an administrative act if the administrative act would otherwise have to be denied or if the issuance of the administrative act must be decided based on the discretionary power of the administration.

13. Considering the strengths and deficiencies listed in clause 11 and based on clause 43.7 of the document 'Guidelines for Institutional Accreditation', the Council found that if certain conditions are met by the Institution, it is possible to adopt a more positive decision if a secondary condition is attached to the decision.  
In view of the above, the Council

**DECIDED THE FOLLOWING:**

**To accredit the Estonian Free Church Theological Seminary for seven years with the following secondary condition:** KUS shall submit a report in English by 1 July 2027 at the latest on the elimination of the deficiencies listed in clause 11.2. 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.

14. If the Estonian Free Church Theological Seminary does not fulfil the secondary condition by the deadline, the Council shall revoke the accreditation decision or establish a new secondary condition.
15. The accreditation is valid until 1 July 2032 or until the revocation of the decision.
16. The Council proposes to the Estonian Free Church Theological Seminary to submit, together with the report on the fulfilment of the secondary condition, an overview in English of the Institution's activities concerning the consideration of other areas for improvement and recommendations highlighted in the Council's decision by 1 July 2027, at the latest.
17. A person who considers that their rights have been violated or their freedoms restricted by a decision may submit an appeal 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. Judicial contestation of a decision is possible within 30 days from the date of service of the decision by filing an appeal with the Tallinn Administrative Court pursuant to the procedure provided for in the Administrative Court Procedure Act.

**Hillar Bauman**

Secretary of the Council