



**HAKA**

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Assessment Report on Fulfilling the Requirements of  
the Secondary Condition of Institutional  
Accreditation

**THE INSTITUTE OF  
THEOLOGY OF THE  
ESTONIAN EVANGELICAL  
LUTHERAN CHURCH**

2025



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## Introduction

## Background and aim of the assessment

‘Institutional accreditation’ is the process of external evaluation which assesses the conformity of a university or higher education institution’s management, work procedures, study and research activities and environment to both legislation and the goals and development plan of the higher education institution itself. This is feedback-based evaluation in which an international expert panel analyses the strengths and weaknesses of the institution of higher education based on the self-assessment report of the institution and on information obtained during the assessment visit, providing recommendations for improvement and ways of implementing them.

The goal of institutional accreditation is to support the development of strategic management and quality culture that values learning-centeredness, creativity and innovation in the higher education institutions (HEIs), as well as to increase the societal impact of education, research and development delivered by the HEIs.

Educational institution must undergo institutional accreditation at least once every seven years based on the regulation *Guidelines for Institutional Accreditation* approved by HAKA Quality Assessment Council for Higher Education (hereinafter HAKA Council) [Institutsionaalse akrediteerimise juhend](#) as of 2.07.2024.

The institutional accreditation of the Institute of Theology of the Estonian Evangelical Lutheran Church (hereinafter the Institute of Theology) took place in March 2023. HAKA Council decided at its meeting on 29.06.2023, that the next accreditation is to take place in seven years if the HEI meets certain requirements set by the HAKA Council.

The task of the current expert panel was to evaluate whether the requirements (secondary condition) set by the HAKA Council have been met by the Institute of Theology.

The expert panel consisted of the following members:

Joke van Saane	Rector, Professor; University of Humanistic Studies (The Netherlands)
David J. Shepherd	Professor; Trinity College (Ireland)

## Assessment process

The higher education institution sent its progress report on the fulfilment of the requirements of the secondary condition to HAKA on 19.06.2025.

The members of the expert panel wrote the report based on the written materials presented by the HEI and the information obtained in the interviews held (electronically) on 24.09.2025.

In the following sections, the expert panel summarises their findings regarding the fulfilment of the secondary condition and provides feedback on the progress the HEI has made in connection with experts' recommendations made in the institutional accreditation report in 2023.

The institution did not have any clarifications or comments on the report. The panel submitted the final report to HAKA on 14.11.2025.

The current report is a public document and made available on HAKA website after HAKA Council has made its decision.

## General progress report

General assessment of the actions taken by the Institute of Theology with regard to improvement areas presented in the HAKA Council decision on 29.06.2023.

### Comments

The Institute of Theology of the Estonian Evangelical Lutheran Church (EELC) has made significant progress in addressing the recommendations from the previous institutional accreditation visit in 2023. The deficiencies concerned two standards, Strategic Management and Academic Ethics. The first standard focuses on more general structures and processes on institutional level, the second standards implies also more technical measures.

The Overview of Follow-Up Actions in the Areas of Improvement Identified during the 2023 Institutional Accreditation, including 5 appendices, is describes all actions and improvements. According to the panel, this overview is impressively detailed and structured; it demonstrates the Institute's willingness to comply with the standards. Upon request, the panel was also provided with additional information and documents. The main recommendations and improvement areas from the former institutional accreditation were Strategic Management and Academic Ethics. The Institute has assigned responsible staff members to strategic activities. Furthermore, an Academic Ethics Committee is established, with guidelines for research ethics and data protection. It is clear to the panel that both areas have received significant attention, but it is also clear that both areas still need improvement.

Limited enrolment<sup>1</sup> remains a vulnerability for the Institute and an ongoing concern for the leadership, given the nature of theological education and limited career prospects within the church. The newly developed external communication strategy offers an opportunity to reach different student groups. During the online site visit, the representative of the owner also described the promising church strategy to engage young people in discussion about the attractiveness of theology and church career.

The filling of all necessary academic positions remains a concern for the leadership. Especially in the area of practical theology, it turns out to be extremely difficult to appoint good scholars who are both academically competent and committed to the church and its practical development. The

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<sup>1</sup> In autumn 2023, 23 students began studies: 18 in the PHE programme, 4 in the Theology MA programme, and 1 in the Studies of Christian Culture MA programme. Additionally, 3 as external students.

In autumn 2024, 16 students began: 6 in PHE, 4 in Theology MA, and 6 in Studies of Christian Culture MA. Additionally, 11 as external students.

leadership already considered creative solutions like training junior staff and reframing the area's main focus, which for the panel illustrates the adaptability of the institute.

Some improvements have been made in the area of quality culture. Quite understandably, the small size of the institute seems to foster an informal culture. Nevertheless, some more formal procedures and practices have been implemented, providing more opportunities for sharing good practices and dealing with critical issues from the students' perspective. Good examples are all the newly installed committee on Academic Ethics and the introduction of an annual employee satisfaction survey. The quality of education will benefit from the recently developed and adopted training plan for academic staff. Since this plan broadens and strengthens the professional toolbox of staff members, this professionalisation should improve diversity in teaching and learning, and strengthen feedback mechanisms.

## **Recommendations**

*NA*

## **Further considerations**

The small size of the Institute tends to be used as an excuse for leadership not to establish formal processes, because they easily lead to more bureaucracy. Unnecessary bureaucracy needs to be avoided, but formal processes, including shared documents, are potentially very helpful for individuals to improve practices. This observation applies to teaching practices, academic ethic guidelines, feedback cycles and risk management processes. The panel encourages the Institute to reconsider its natural attitude to formal procedures from necessary evil to intrinsically helpful

## **Report on fulfilling the requirements of the secondary condition**

At its meeting on 29.06.2023 HAKA Council decided that the next institutional accreditation of Institute of Theology will take place in seven years but set a secondary condition that the university must meet in two years.

The following are the requirements set by the HAKA Council to be met by Institute of Theology, and the expert panel's assessment on the developments Institute of Theology has made in this regard.

<b>Shortcomings in strategic management:</b> the goals and objectives included in the development plan and action plan of the Institute of Theology are not sufficiently detailed. Therefore, it is not possible to systematically assess the achievement of the goals. Detailed goals that allow for the assessment of their achievement must be phrased. A person in charge must be appointed for each goal and action.
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<b>Assessment of the expert panel:</b> <b>the secondary condition is partially met</b>
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## **Evidence and analysis**

The Institute of Theology of the Estonian Evangelical Lutheran Church has taken a major step toward improving the strategic Development Plan by adding specific activities. Even more important is the Institute's decision to assign a responsible staff member to each activity. Appendix 5 ('Action Plan for 2022–2026 in support of the Strategic Plan') describes per sub-area which actions are being taken, which results have been achieved in recent years and who is responsible. However, this Action Plan cannot hide the fact that the institute, according to the Overview of follow-up actions, has deliberately chosen not to turn the development plan into an "overly extensive document that would become more of an administrative burden for our small staff" (Overview of Follow-Up Actions in the Areas of Improvement Identified during the 2023 Institutional Accreditation, p.1). The goals of the original Development Plan remained unchanged, the targets and objectives still lack specificity. No intentions are expressed to improve this situation. During the interview with the top management of the school, the rector and the Head of TAT expressed their satisfaction with the addition of some concrete activities, the assignment of responsible officials to activities and the weekly discussions about the plan between rector and dean. This supplement to the development plan adds value by reinforcing a practice of monitoring and reflection. However, according to the panel, it is quite problematic to hold individual staff members responsible for specific activities and areas, without clarity about concrete objectives or even timelines. It is impossible to assess success or failure without these. Monitoring activities without being able to keep in mind the specific goals and objectives limits attention to intentions instead of results. Nevertheless, the panel believes that the assignment of responsible staff members and the introduction and implementation of annual monitoring already lead to major improvements.

The institute has successfully extended its cooperations with other higher education institutions within Estonia. The rector regularly attends meetings with peer rectors, and there is increased interaction with the Ministry of Education and Research. Agreements are (to be) signed with the Baltic Methodist Theological Seminary and the Estonian Free Church Theological Seminary. Co-publishing is strongly encouraged by inviting international researchers and the implementation of cooperation with other institutes including arrangements on co-authoring papers, resulting in a modest increase in international papers, as confirmed during the interview with the rector and one of the Chairs. At the same time, the institute faces challenges with internationalization, which currently depends heavily on individual research networks. During the interview, the Dean assured the panel that internationalization and encouraging the involvement of colleagues in their own network is part of the annual performance interview, which is an opportunity to offer help as well.

Significant efforts have been made to increase income from private funds, for example by arranging an annual fundraising gala dinner event and expanding church giving practices. During the interview with the rector and the owner representative, more opportunities for fundraising were provided, also from abroad.

The recommendation to implement a strategic plan for the systematic development of academic staff's research and teaching competencies has been followed up by the adoption of a training plan for academic staff, presented in Appendix 2 (Research and Teaching Skills Development Plan for Academic Staff). The Dean explained in the interview that this plan has been created in a process of interviewing department heads and reviewing student feedback; the draft was subject to a discussion in the faculty council. The panel appreciates this process, while the process itself already helps the professionalization.

## Conclusion

The Institute has improved its strategic management significantly by (1) assigning individual responsible staff members to each strategic activity, (2) implementing annual monitoring and (3) extending funding opportunities. Professional staff development strategies are covered in a recently adopted institutional plan. Internationalization is still a challenge, but strategies are clearly being pursued by both management and individual staff members.

However, the Institute has been less successful in specifying strategic targets and objectives. This poses a risk to making well-considered strategic decisions and could even undermine the future viability of the Institute.

As noted above the panel is of the view that this condition has been partially met.

### **Strengths**

NA

### **Areas of concern and recommendations**

The goals of the original Development Plan remained unchanged, the targets and objectives still lack specificity. It is strongly recommended to formulate concrete and specific objectives. This is not only necessary for the monitoring and steering processes, but also to avoid giving staff members responsibility for activities without criteria for success or failure.

### **Opportunities for further improvement**

NA

<b>Shortcomings in academic ethics:</b> the higher education institution has no regulations on academic ethics. These must be developed. Also, there is no body to monitor compliance with the recently signed Estonian Code of Conduct for Research Integrity.
<b>Assessment of the expert panel:</b> <b>the secondary condition is fully met</b>

### **Evidence and analysis**

It is clear that the Institute has taken significant steps to address the shortcomings in relation to academic ethics identified in the initial report and meet the requirement of the secondary condition in relation to this. These include:

#### **The development and approval of 'Guidelines for Research Ethics and Personal Data Protection in Graduate Papers'.**

Review of this document suggests that its various sections ('General Provisions', 'Research Ethics Issues', 'Protection of Personal Data', 'Submission of a Declaration') and the forms included as appendices, reflect best practice in Higher Education and will suit the purposes for which they are intended. It is important that guidelines for Research Ethics and Personal Data Protection in relation to academic staff of the institute also be in place (see recommendation below).

#### **The establishment of an Academic Ethics Committee.**

The Guidelines noted above require research relating to human subjects to be reviewed and approved by a three-member Academic Ethics Committee. In response to queries, the Institute clarified that:

- while no committee meetings have been held yet, the committee is scheduled to meet for the first time immediately after Oct 15, 2025, to discuss the research outlines which have been submitted and to provide guidance to authors and supervisors on academic ethics issues.
- the committee has the right to propose to the Dean that an outline be rejected. This may mean that the student will not be allowed to begin their research as planned and will have to thoroughly revise their topic or research method and resubmit their outline to the committee.
- the Dean's approval depends on the consent of the ethics committee.
- the appointment of Ethics committee members is based on disciplinary diversity, relevance and experience
- while there is no external representation on the Committee, the Institute may if necessary involve outside experts or refer the research for evaluation to another body (e.g., the Ethics Committee of the University of Tartu or the Ethics Committee of the Institute for Health Development).
- The Committee may receive concerns or questions regarding a student's own research but also welcomes concerns regarding research being undertaken by others.

On the basis of the documents and responses to queries, the panel members are satisfied that the Ethics committee should be fit for purpose, but because it had not yet met or begun its work, the panel could not comment on its efficacy. It recommends that the Committee's function in relation to so-called 'whistle-blowing' should be made more clear and that its remit should be expanded to include approval of research conducted by academic staff of the institute (see comments on 'Guidelines' above).

### **Making relevant academic ethics documents visible**

The panel was pleased to see that the sectoral document on Good Research Practice was posted on the Institute's website (<https://www.eelkui.ee/yldinfo/alusdokumendid/hea-teadustava-2017/>). It is suggested that a space is designated on the Institute website for this and other documents, resources etc relating to Academic Ethics.

### **The development of guidance on 'How to Use Artificial Intelligence in the Educational Process'**

Having reviewed an English translation of this guidance (and after discussion with Institute staff and students), the panel formed the view that this guidance is fit for purpose and offers both students and staff much greater clarity regarding how Generative AI may and may not be used by students.

### **Conclusion**

As noted above the panel is of the view that this condition has been substantially met. Robust guidelines pertaining to Research Ethics and Data Protection have been developed. A body has been established within the Institute which will evaluate and approve relevant research proposals of students to ensure that they meet ethical standards.

### **Strengths**

NA

### **Areas of concern and recommendations**

- It is important that the Institute also has guidelines for Research Ethics and Personal Data Protection that are applicable to academic staff of the institute. It is recommended that the guidelines and processes developed for granting ethical approval for students' research be modified so as to apply to academic staff or a comparable set of guidelines and processes applicable to them should be developed.

### **Opportunities for further improvement**

- It is suggested that a space/page is created on the Institute website for documents, resources etc relating to Academic Ethics including but not limited to the Estonian Code of Conduct for Research Integrity.
- It is recommended that the Guidelines make more clear that the Ethics Committee will consider not only queries and concerns pertaining to research ethics about one's own research, but also those pertaining to the research ethics of others' research, if these arise (i.e. that the Committee facilitates whistle-blowing if necessary).