

## **EKKA's Conclusions Regarding the Suggestions of the ENQA Review Panel**

### **1. The Criteria for Decisions (2.3)**

**1.1 Recommendation of the Panel:** To secure transparency and proportionality in decision making which affects all types – state, public and private – providers, and to properly manage expectations on part of both HEI and students in the programs, clear decision-making criteria should be identified for both transitional re-evaluations and assessments of study program groups in the first and second cycle of higher education. The clarity should especially be achieved in noting the importance of weighing the conformity between different standards. As transitional re-evaluation procedure will be an on-going one and, according to EKKA's self-evaluation report, may continue until 2017, it is strongly advisable to streamline the decision making process by establishing more clarity between types of component assessment judgments and proposals toward the granting or depriving higher education institutions rights in study program groups.

#### **EKKA decided to take the recommendation partially into account:**

- a) Until recently, the regulation for transitional re-evaluation stipulated that it was possible for the Assessment Council to make a proposal to the Minister of Education and Research to grant the educational institution the unlimited right to conduct studies in the study program group 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).**
- b) **The Council also decided that the Guidelines for Initial Assessment of Study Program Groups should be modified so that instead of just making one decision regarding the compliance of the quality of instruction with requirements, the assessment committee shall, similarly to the process of re-evaluation of study program groups, evaluate the quality of studies in separate components. Based on these component assessments, the final decision shall be made by the Council who has the same discretionary power as in the process of re-evaluation of study program groups. A deadline of September, 2013 was set for implementing this change.**

- c) As a general note, it has been EKKA's conscious choice to keep the decision-making processes flexible in regard of transitional re-evaluation and assessment of study program groups, thus providing the EKKA 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 always has 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.
- d) The assessment of study program groups is mainly aimed at improvement and therefore requires a more dynamic and context sensitive approach, 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, will find any lack of conformity of the study programs, instruction or instruction-based development with legislation, national or international standards. If such a lack of conformity is found, the Council shall point it out in the decision and subsequently decide that the next assessment shall take place in less than seven years. Whether it shall 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 decision of the Council shall be to carry out the next assessment in seven years.

1.2. **Recommendation of the Panel:** Accreditations of study program groups in VET is listed among the main functions of EKKA in its Statutes, and this type of evaluations as tested are running from 2011, therefore, there needs to be publicly available evaluation methodology including criteria for decisions in English.

**EKKA decided to take the recommendation partially into account:**

It does not seem reasonable to translate all the material until the new VET Act is adopted. Consequently, it shall also be necessary to supplement the accreditation procedure which can be done in the first half of 2014. **The deadline for making necessary modifications in EKKA's VET regulations and completing the translations is June, 2014.** Initially, the information on the website shall be complemented. A link to EQAVET's website was added on the English version of EKKA's

website and also a separate VET section will be created. **The deadline for the primary upgrade of the website is 1 September, 2013.**

## **2. Reporting (2.5)**

**2.1. Recommendation of the Panel:** The Review Panel encourages EKKA to cooperate with other structures and agencies in Estonia, but most importantly, with stakeholders themselves regarding improvement in information provision.

**EKKA's comment:** **We hope to benefit from participation in an ENQA project called "Transparency of European higher education through public quality assurance reports" (EQAreP).** In general, we have engaged in this issue constantly, and taken into account the needs of different target groups: we have disclosed the evaluation results based on the expectations of different target groups (universities, current and future students, public sector and employers). For example: a leaflet about transitional evaluation, a user-friendly version with the results of the evaluation in different colors is on EKKA's website; in the cases of institutional accreditation and the quality assessment of study program groups, a summary report is available alongside the comprehensive assessment report (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.

**2.2. Recommendation of the Panel:** Publishing and availability of reports should not just be a formal measure, but it must reach the intended audience. Therefore, user-friendliness of EKKA database with assessment decisions and expert reports should be improved.

**EKKA's comment:** **The database is being developed in parallel with the new website.** The deadline for the launch of improved database is 1 January 2014.

**2.3. Recommendation of the Panel:** All the self-evaluation reports should be made publicly available on EKKA's website.

**EKKA decided not to take the recommendation into account.** We find important that, where appropriate, certain parts of the self-assessment report can be omitted from the materials disclosed to the public. **In the interests of transparency, a note shall from now on be added to the assessment report to indicate whether it has been published in full or in part.**

**2.4. Recommendation of the Panel:** 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. EKKA is encouraged to

consider various options and to afterwards implement that is suiting Estonian HEI and the agency context best.

**EKKA has already taken the recommendation into account.** During the site visit of the Review Panel, the quality label was already in a development stage. **For the present, the label has already been awarded to four higher education institutions who have successfully passed the institutional accreditation.**

**2.5. Recommendation of the Panel:** EKKA should address Estonian and English language usage in both institutional self-analyses and evaluation reports, as well as on its webpage to reach local audiences and provide sufficient information for international partners.

**EKKA decided to take the recommendation partially into account:** We consider this request in full to be excessively resource intensive, in both temporal and financial sense. We agree that all decisions made by the Assessment Council (the summary report) should be translated into English, but we do not consider it appropriate to conduct the translation from Estonian into English of all self-analysis and assessment reports and vice versa. This is a question of target audience – who are the people who would like to read these documents. **EKKA Assessment Council adopted a decision in June to continue to translate all Estonian assessment decisions (which is essentially the Summary Report) into English, and publish them on the English version of the site.**

**2.6. Recommendation of the Panel:** EKKA should take measures to report via website on accreditation process and results in VET in English.

**EKKA decided to take the recommendation partially into account.** We do not see it fit to translate all the Assessment Council decisions – the question arises as to whom they are translated. In higher education, the potential target audience would be a person who wishes to enter a higher education institution here. In vocational education, there is no possibility to conduct studies in English. EKKA's decision: To keep the international public informed, the periodical analyses of evaluation results concerning vocational education shall be translated into English.

### **3. Follow-up Procedures (2.6)**

**3.1. Recommendation of the Panel:** 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 shall discuss this matter with the higher education institutions.** In case of a secondary condition, we shall add the report of the HEI to the new decision made by the Council. Initially, it does not seem sensible to add the action plans / reports to all the decisions. As a follow-up activity, EKKA shall organize workshops where higher education institutions who have undergone the evaluation introduce planned activities which are based on the results and recommendations presented in the assessment reports, and they get feedback from EKKA specialists and other higher education institutions.

4. **Periodic reviews (2.7)** (the recommendation appears to be in the wrong paragraph but is essentially related to the decision-making criteria)

- 4.1. **Recommendation of the Panel:** It is advisable to set clear assessment terms and conditions with respect to quality assessment of study program groups in the first and second cycles of higher education, and also for transitional re-evaluations.

**EKKA decided to take the recommendation partially into account (See EKKA's comment in section 1.1).**

5. **Official Status (3.2)**

- 5.1. **Recommendation of the Panel:** 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: We shall inform the Ministry of Education and Research of this recommendation.**

6. **Resources (3.4)**

- 6.1. **Recommendation of the Panel:** It is advised to consider possibilities to 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: We thoroughly agree with this recommendation**, although currently already 5 of EKKA's 7 employees are involved in different projects or working groups and some of us are active in several international working groups. Taking account that our collective is fairly small, it is questionable whether we would be capable of any more such activities. For example, right now we are participating in three different ENQA working groups (Stakeholder Involvement, Excellence, Internal Quality Assurance), the EQArep project coordinated by ENQA and a Twinning project taking place in Kosovo, as well as we are preparing for the INQAAHE Forum 2014, taking place in Estonia. However, we are ready to take part in the work of the boards of different agency networks (ENQA; INQAAHE etc.).

## **7. Independence (3.6)**

**7.1. Recommendation of the Panel: 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.

**EKKA's comment: Fundamentally, we take the comment into account, however, we do not deem rational to provide gender quotas.** Partially, we have already fulfilled the recommendation – after the site visit by the Panel, another female member was elected to the Assessment Council. We are not planning to expressly introduce gender balance requirement into the procedure for formation of the council, but it could be included as a selection criterion (in the case of equal candidates). This aspect could be stressed in the cover letters to the organizations presenting the candidates for election.

**7.2. Recommendation of the Panel:** 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: Fundamentally, we take the recommendation into account but do not deem reasonable to introduce a specific requirement into the regulation. According to legislation, the candidates are presented by different organizations and a new Council is elected in every 3**

years. However, it is stated that a person cannot be a member of the Council for more than 6 consecutive years. The principle that the membership of the Council should be refreshed, could also be included as a selection criterion.

#### **8. External quality assurance criteria and processes used by EKKA (3.7)**

**8.1. Recommendation of the Panel:** It should be discussed, how more transparency into the processes of transitional evaluation and re-evaluation, and initial assessment of study program groups in first and second cycles in higher education could be brought. In both cases, decisions issued by the Ministry of Education and Research affect degree granting powers of education providers, therefore, fair competition conditions and information provision should be secured.

**EKKA's comment:** See EKKA's comment in section 1.1.

#### **9. Accountability (3.8)**

**9.1. Recommendation of the Panel:** 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:** At the present, we are already making the relevant information regarding the experts' background available on our website.

Compiled by Heli Mattisen and Lagle Zobel on the basis of EKKA's development seminar conducted on 5 May 2013 and the decisions made by the EKKA Quality Assessment Council at its session on June 4, 2013.