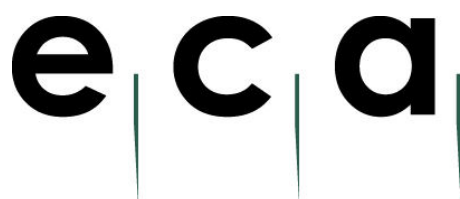


Observation report

Slovenian Quality Assurance Agency for Higher Education (SQAA)

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european consortium for accreditation

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1. Introduction

The European Consortium for Accreditation in higher education (ECA) has been founded in 2003 with the aim of mutual recognition of accreditation and quality assurance decisions. A first step towards reaching this goal was the signing of twelve bilateral mutual recognition agreements between ECA members. These agreements are most useful for joint programmes, but twelve bilateral agreements, restricted to a limited number of ECA member countries, only fully covers a limited number of joint programmes. A multilateral mutual recognition agreement (MULTRA) with a focus on joint programmes was conceived to improve this situation. As a result, joint programmes can be assessed in a single procedure rather than through multiple national accreditation procedures.

The MULTRA stands for a high level of trust between accreditation agencies. This trust is based on evidence gained through intense cooperation and observations of procedures amongst the MULTRA agencies. The observation is not meant to repeat the external evaluation of an agency but aims to gain mutual trust through observing accreditation practice. The observation should provide evidence if the accreditation procedures and standards are free of significant differences from those of MULTRA agencies and if the results of accreditation procedures of joint programmes can thus be accepted by MULTRA agencies.

For agencies seeking to sign MULTRA, two MULTRA members will write an observation report and give a recommendation to all MULTRA members.

2. General information

<i>Accreditation organisation observed:</i>	Nacionalna Agencija Republike Slovenije za kakovost v visokem šolstvu (NAKVIS) English name: Slovenian Quality Assurance Agency for Higher Education (SQAA)
<i>Country</i>	Slovenia
<i>Accreditation procedure regarding:</i>	Programmes delivered by the Faculty of Agricultural and Life Sciences, University of Maribor
<i>Date(s) of the observation:</i>	23 April 2013
<i>Name/organisation of the observers</i>	Mieczysław W. Socha, PKA, observer 1 Mark Frederiks, NVAO, observer 2 Rolf Heusser (chair of experts panel for the ESG review of SQAA) Anca Prisacariu (student member of experts panel for the ESG review of SQAA)

3. Observations

Our observation report sets out to address two key questions: to what extent accreditation standards, procedures and practical experiences of the Slovenian Quality Assurance Agency for Higher Education (hereinafter: SQAA) are free of significant differences from those of MULTRA agencies? Could SQAA become a signatory agency to MULTRA?

The observation report was drawn up on the basis of (a) documents review, including a self-evaluation report (SER), prepared by SQAA for the external experts panel evaluating the Agency because of its application for EQAR membership, (b) meetings with Agency's management, its employees and strategic stakeholders, (c) one-day observation of SQAA expert panel's

proceedings evaluating study programmes at the Faculty of Agriculture and Life Sciences of the University of Maribor. In the first part of the report we concentrate on the institutional and programme accreditation framework. Latter parts present our opinions about the SQAA expert panel at the University of Maribor. The closing part of the report presents recommendations with regard to the admittance to MULTRA.

In Slovenia, the origins of the external system of quality assurance in higher education go back to 1994. SQAA in its current form was established in 2010 with the Resolution on the Founding of the Slovenian Quality Assurance Agency for Higher Education under Article 51.e. of Law on Higher education (LoHE, ZViS in Slovenian) by the Government of the Republic of Slovenia (Official Gazette of the Republic of Slovenia, No 114/2009). SQAA is an independent, national accreditation agency funded from the government budget and operating as a legal entity under public law. It has the status of a direct non-governmental budget spending authority, which negotiates its budget directly with the Ministry of Finance. Its accreditation decisions carry legal consequences for universities under evaluation, which ought to subject themselves to accreditation. In April 2013 it underwent, for the first time, external evaluation for purposes of EQAR membership and later in 2013 there are plans for an external evaluation by a ENQA review panel.

3.1 Framework of the procedure

In which framework did the procedure take place? This section should address the elements listed below on order to provide an in-depth understanding of the accreditation practice of the observed agency.

1. Structure of accreditation framework (including relevant documents, e.g. legislation, ...)

Accreditation and external evaluation of higher education quality is founded on three main rules: (a) it is compulsory and universal, i.e. includes all public and private universities, study programmes as well as higher vocational colleges; (b) it is carried out by one, national accreditation agency (SQAA) established by the government, but given attributes of independence; (c) it is striving for implementation of international accreditation standards, including ESG, and intends to integrate the national quality assurance system with the European one.

Main objectives, tasks, procedures and structure of SQAA were outlined in part Vb LoHE (Annex 4 of the SQAA SER) and discussed in detail in the aforementioned Resolution on the Founding of SQAA (original version available on Agency's website). Art. 51f of LoHE lists 16 functions of the Agency, including: overseeing the system of quality assurance in higher education and post-secondary professional education; external evaluations of higher education institutions and study programmes, and of higher vocational colleges; designing procedures and criteria for external evaluation and accreditation. The Agency defined its mission and vision statement for 2011-2016). In 2011 the SQAA Council passed the public information and communication plan as well as the accreditation planning for

2011-2013.

The Agency aspires to become internationally recognisable, complying with ESG and other European and global standards. Principles laying the foundations for its operations are independence, responsibility, transparency, professionalism, efficiency and commitment to progress. Among the six strategic goals to be completed before 2016 listed are: encouraging the quality of transnational education and membership of ENQA and EQAR.

The evaluation and accreditation of HEIs and programmes resemble that of other European agencies. However, the accreditation practices are more focussed on educational processes than on learning outcomes. The proposed accreditation criteria were consulted with key stakeholders, i.e. representatives of Slovenian universities, private higher education institutions, higher vocational colleges, the Slovenian student union, employers and competent national bodies. The following documents formally describe criteria and procedures:

- Criteria for the Accreditation and Evaluation of Higher Education Institutions and Study Programmes (Official Gazette of the Republic of Slovenia, No 95/2010, 17/2011, 51/2011 and 6/2013 and SQAA website)
- Criteria for Transferring between Study Programmes (Official Gazette of the Republic of Slovenia, No 95/2010 and 17/2011)
- Criteria for the External Evaluation of Higher Vocational Colleges (Official Gazette of the Republic of Slovenia, No 9/2011)
- Criteria for the Accreditation of Study Programmes for Teacher Education (Official Gazette of the Republic of Slovenia, No 94/2011),
- Criteria for Entry into Register of Experts (Official Gazette of the Republic of Slovenia, No 95/2010, 17/2011 and 22/2012)
- Criteria for the Allocation of Credits to Study Programmes under ECTS (Official Gazette of the Republic of Slovenia, No 95/2010)
- Minimum Standards for the Election to the Title of Higher Education Teacher, Researcher and Faculty Assistant at Higher Education Institutions (Official Gazette of the Republic of Slovenia, No 95/2010, 17/2011)
- Criteria for Transnational Higher Education (Official Gazette of the Republic of Slovenia, No 18/2012)

The Agency assures extensive training for its members and experts. An important element of the accreditation infrastructure are the Quality Manual, Manual for experts, the Training Manual for Candidates, and Criteria for experts. The last document stipulates criteria for candidates applying for status of SQAA expert. As of 2011 the Agency, as per Article 51f of LoHE holds an official Register of its experts.

To summarise this part of the report, it is fair to say the SQAA has a full range of formal and legal solutions regulating how it operates. The majority of those documents were put in place in 2012. Implemented solutions were monitored, consulted with university representatives and revised if necessary. Review of the Accreditation Criteria and Evaluation Criteria is also planned for 2013. Observers have no doubts that the accreditation framework in force resembles those used by European agencies which are

signatories to MULTRA. Somewhat inconvenient could be the excessive number and complication of legal provisions, which apart from essential issues also concern those of lesser importance for external quality assurance. The interpretation and changes of the accreditation framework usually take a long time and the system is in danger of losing its flexibility. The SER provide examples of some propositions, intended to solve this issue, which were submitted by SQAA to the government.

2. Accreditation standards

Accreditation standards were developed by the SQAA in close collaboration with university representatives. They were published in Criteria for the Accreditation and External Evaluation of Higher Education Institutions and Study Programmes (p. 29). That comprehensive, voluminous document has references to the ESG and describes procedures and requirements with regard to institutions applying for accreditation and expert team work. It is divided into institutional and programme accreditation carried out ex ante (so-called initial accreditation) and accreditation carried out ex-post - the so-called re-accreditation. Moreover, drawn up separately were standards for evaluating doctoral studies and evaluation criteria for joint programmes and transnational education. All standards were grouped into six sets reflecting key areas subject to evaluation: integration with the environment, functioning of the higher education institution, human resources, student affairs, resources and infrastructure, internal quality assurance system.

For purposes of programme evaluation two additional standards are taken into account, namely demand for the study programme and the organisation and provision of education. In each of the aforementioned areas, expert panels use many detailed criteria. Some of these come more as requirements towards the organisation of the HEI itself than that these are directly related to the evaluation of educational quality. A typical example would be a provision concerning the third area which stipulates that the person responsible for student affairs shall be employed at the institution.

Institutional accreditation is based on 44 criteria. The first evaluation area uses three criteria concerning the standing of the HEI in its social and economic environment, dialogue with stakeholders from the world of business and non-business sectors and intended learning outcomes designed to assure employability of graduates or prepare them for further education. The second area uses ten evaluation criteria concerning mission and vision statements, strategy for developing the HEI and its internal organisation, linking fields of study with academic disciplines, scientific research and their relation to the didactic process, collaboration with academic institutions, relationship between study programmes and scientific and didactic of competences of university teachers, practical training conducted outside the HEI.

The third area is evaluated using ten criteria concerning the number, structure and qualifications of teachers. One criterion, of organisational character, specifies that all study areas and academic disciplines ought to be equally represented in the Senate of the HEI.

Nine criteria relate to the fourth area, i.e. student affairs, including student appraisals of the teachers.

The next seven criteria cover requirements towards didactic, scientific and research resources (fifth area).

Six detailed criteria apply to the sixth area, i.e. the internal quality assurance system. According to the first criterion of that last area, a newly established HEI has to observe "European standards" when setting out its strategy and designing the quality assurance system.

Some of the criteria are duplicated, e.g. regular collection and analysis of data on the learning outcomes of students and overall education and other related activities is standard no. 4 for area 6 as well as criterion 7 for area 4.

The evaluation of first and second cycle programmes uses 18 detailed criteria concerning practically all aspects of accreditation, i.e. learning outcomes, enrolment, curriculum, studies organisation etc. In order to evaluate third cycle studies, three additional criteria are used, namely advanced level understanding of theory and methodology, skills to develop new knowledge, critical thinking, ability to run the most complex working systems and conduct scholarly, research projects.

A separate set of 50 evaluation criteria was designed for higher vocational colleges.

The number of criteria is high. Although this is not entirely unusual in European external evaluations of the quality of higher education, it does open the door to multiple interpretations thus creating a risk that these criteria could be misconstrued by different expert panels and SQAA Council members taking accreditation decisions. The Agency makes efforts to prevent that from happening by providing intensive training to experts and Council members.

The accreditation criteria are available on the Agency's website: <http://test.nakvis.si/en-GB/Content/Details/10>. In the FAQ section, Agency employees explain accreditation criteria and procedures. In a survey sent to all stakeholders (Annex 1, SER), experts taking part in ex-post accreditation were critical about the clarity of the wording of criteria (score of 1.7 on five-point scale) and guidelines for drawing up the report (1.5). The SER (p. 16) shows that it was most problematic to unequivocally and unambiguously interpret criteria concerning teaching and scientific staff as well as scientific research. Consequently the criteria were revised and amendments to legal regulations suggested. During talks held with the observers, the SQAA experts on the site visit concluded that they see no areas of external evaluation criteria open to misinterpretation.

3. Additional requirements for the assessment of joint programmes

Apart from the usual set of criteria used for purposes of programme evaluation, three additional criteria deal with evaluating joint programmes. The foreign HEI co-delivering the programme is required to attain accreditation or recognition in the country in which it operates. It also has to have in place procedures for evaluating, accrediting and recognising joint programmes in its native country.

4. Focus of the accreditation procedure (e.g. input factors, internal quality assurance, ...)

SQAA accreditation procedures, similar to many other agencies, focus on three main elements, namely learning outcomes, educational process and the internal quality assurance system. The Slovenian accreditation system apportions more weight to the latter two areas. Numerous

criteria are used to evaluate the educational process and factors facilitating it, i.e. the curriculum, teaching staff, scientific research, didactic and research infrastructure. The HEI is required to have a quality manual which should document the formal regulations of the internal quality assurance system.

Learning outcomes are rather narrowly defined, indicative of which is Article no. 3 SQAA Criteria for Accreditation and External Evaluation (p. 3) which mentions knowledge and skills only. Learning outcomes are neither referred to nor mentioned in Article 5 of the above mentioned document entitled „general orientations regarding accreditation” or Agency's strategic goals. The reason apparently is that no National Qualifications Framework for higher education is passed by the government. It is mentioned that the programme has to be consistent with educational goals and learning outcomes, but other elements of the educational process, e.g. the teaching staff are not clearly linked with the learning outcomes. Article 17 of the initial accreditation of the programme reads that the process of comparing any given programme with foreign programmes, should focus on the learning outcomes or competencies.

5. Assessment of achievement of learning outcomes

There are few references on how to assess whether the intended learning outcomes have been achieved. Article 25 of Criteria for Accreditation and External Evaluation stipulates that the HEI has to monitor the achieved learning outcomes and the learning outcomes demonstrated by graduates in the labour market. Criterion 7 of the initial accreditation section (Article 12, students) requires the HEI to regularly collect and analyse data on the learning outcomes of students, whereas Article 8 provides that students ought to take part in evaluating their performance. Article 17 mentions, among requirements concerning the structure of the syllabi, also methods of testing and assessing knowledge. Evaluation methods are supposed to assure appropriate verification of achieved learning outcomes and competences (criterion 13). Article 28 of the ex-post institutional accreditation (criterion 13) provides that HEIs have to constantly compare planned and achieved learning outcomes of students and the competences of graduates.

6. Enhancement strategies for institutions

Until very recently, recommendations and guidelines for HEIs could not be included in the assessment report. Thereby one of key ESG objectives could not be completed, namely promoting enhancement of the quality assurance system.

The SER (p. 12) stresses that the Agency always strives to improve accreditation procedures and the quality assurance system. The accreditation system in its current form expects experts to formulate recommendations giving arguments for improving the quality system (see Manual for experts p. 11). Said documents also give guidelines as to how experts should formulate their recommendations.

The assessment reports hold many recommendations on the basis of which conditional accreditations were granted. First and foremost, those recommendations are seemingly concerned with HEIs complying with minimum requirements. Hence, follow-up activities would not always facilitate enhancement strategies.

A different platform for promoting quality enhancement strategies are system-wide analysis reports, presenting best practices identified during the accreditation of programmes and institutions.

7. Responsibility for accreditation procedures

LoHE provides the legislative framework for the quality assurance system and its external evaluation as well as accreditation. In accordance with Article 51e of LoHE the government acts within the capacity as the Agency's founding body, which is obliged to annually submit reports about its performance. Article 51m stipulates that the founding body has to provide "necessary facilities and funds" for the Agency to operate. The whole Act 51 determines, sometimes in a quite detailed way, the internal organisation structure of the Agency and the rules governing its operations including the decision-making. For instance, article 51h stipulates that 5 absences of a Council Member during Council proceedings give grounds to relieve him or her of the function. Article 51r provides deadlines for submitting reports. Also, Article 8 of LoHE establishes Slovenian as the default language: „The language of instruction is Slovenian“. Therefore, classes cannot be taught in foreign languages, unless they are also offered in the native tongue.

The Agency has a certain discretion to set up detailed accreditation procedures and criteria. In accordance with Article 51e it is „independent and autonomous in its operation“. LoHE has guaranteed by law the independence to design criteria for external evaluation (Article 51f). The Agency develops the external evaluation methodology, designs procedures for recruiting and training experts, registers them, issues official interpretations in case of ambiguities concerning procedures and accreditation criteria. The Agency has the autonomy to organise external evaluations, plans itself dates of site visits, assembles expert panels (Article 51u stipulates at least three-person teams have to be assembled, one foreign expert and student), makes site visits and drafts the evaluation report. Moreover, it designs criteria for allocating credits to each programme, and minimum requirements for teachers applying for research and didactic posts. One of 16 SQAA functions listed in Article 51f of LoHE obliges the Agency to supervise consistency of its „operation with EU guidelines and international principles in the field of quality assurance“.

Also assured is the independence of expert panels carrying out the external evaluation, and bearing responsibility for writing the evaluation and assessment reports. Rights and responsibilities of experts are presented in-depth in the Manual for Experts.

The Agency also evaluates vocational higher colleges, however, the final decision whether to grant accreditation is taken by the Higher Education Minister.

HEIs' autonomy basically boils down to building internal quality assurance systems, which requires consultation when accreditation procedures change.

8. Steps in the accreditation procedure

The Slovenian system comprises all fundamental steps of accreditation known from other accreditation systems. They include among other preparing the self-evaluation report, appointing an expert panel responsible for evaluation, drafting the evaluation report, submitting amendments to the report by the HEI, taking the accreditation decision given the aforementioned reports were reviewed by SQAA Council, disputing the decision with the Appeals Committee and making an appeal to the court. Deadlines for completing each step are also defined. All significant changes made to the programme by the HEI are subject to evaluation and accreditation.

Apart from exceptional cases, initial accreditation does not require a site visit. The decision is made based on the SER and publicly available sources of information. A site visit is required for programme and institutional re-accreditation. Observers, being members of the Council, Agency employees as well as candidates for experts, can all take part in a site visit.

9. Assessment rules and decision scale when accreditation is granted (e.g. excellent, insufficient; conditions, ...)

Already during the initial accreditation the Agency Council may either grant accreditation or reject application. The ex-post accreditation procedure uses a three-point scale: accreditation awarded, accreditation awarded conditionally, application for accreditation rejected. Without accreditation a programme is not recognised by the government.

10. Decision-making process of the agency (rules and responsibility)

The Agency's organisational structure includes three bodies: the Council, Director and Appeals Committee (see <http://test.nakvis.si/en-GB/Content/Details/71>). The accreditation decisions are taken by the SQAA Council. For the purpose of the decision-making process, the Council reviews the HEI's SER, experts' evaluation report and any comments if submitted by the HEI. Accreditation decisions taken by SQAA are final and result in the HEI recognition or losing its recognition by the government. In the latter case the recruitment of new students is suspended and the education of current students is continued until the completion of the full cycle. As far as higher education colleges are concerned, the power of decision-making is within the remit of the Minister of Education.

The Council appoints and dismisses the Director of the Agency and the Appeals Committee. The Council also appoints the groups of experts. Furthermore, the Council develops a vision for the Agency, and the accreditation procedures and criteria. In general, Council members do not take part directly in site visits, but they can participate as observers.

The second level decision-making body is the Appeals Committee operating under rules specified in „Rules of Procedure of the SQAA Appeal Committee” passed in February 2011. It consists of a president and two members recruited through a public call.

The Director represents the Agency externally and is responsible for implementing the Council's decisions. The Director organises the operations of the Agency and manages two departments: the General Affairs Dept. and Quality Dept. In addition, the Director acts as employer for the Agency employees. The current Director was appointed after the third tender of the public call. Employees of the aforementioned departments support the Council, Director and expert panels.

11. Period of accreditation

Initial and ex-post accreditation may be awarded for 7 years if the HEI satisfies all criteria and any deficiencies identified could not cause deterioration of the quality of education. In case of significant shortcomings, the accreditation can be awarded for 3 years. During that period the HEI has to eliminate within a year shortcomings concerning the teaching and the scientific staff, and all other faults within 6 months.

12. Appeals system

The HEIs may dispute the SQAA Council decisions by making an appeal to the Appeals Committee, both in respect of formal issues and against the underlying accreditation decision. If the appeal of the HEI against the Council decision is sustained, then the case is revisited by the SQAA Council. The Committee's decisions are final but can be appealed against in court. In 10 cases thus far, the Committee dismissed appeals in 6 cases and sustained the complaint in 11 cases. In two cases the Council's decision was overturned partially in a judicial review. The HEI's complaints concerned violating of the substantive rules, irregularities in identifying facts and infringement of accreditation procedures.

13. Publication policy

The Agency publishes on its website all documents describing its mission and vision statement, strategy, accreditation procedures, Council's accreditation decisions and Appeals Committee's decisions. Under the FAQ tab, the Agency provides additional information, including interpretations of adopted criteria and procedures. Information about Council proceedings is being published. The 2007-2008 and 2009 annual reports were published. These reports review the Slovenian quality assurance system. A third report concerning the period 2010-2012 is at the drafting stage.

The Agency does not publish assessment reports. SQAA representatives justified this with legal regulations from 3 documents legislating personal data protection rules. However, the stakeholders, including representatives of the Ministry and HEIs, point to the Agency's reluctance to publish contents of the report and were expecting that policy to change.

14. Average number of procedures per year

Since it was founded (March 2010), until 2012 SQAA took 407 accreditation decisions. Initial accreditation was awarded to 177 programmes (of three education cycles) and ex-post accreditation to 66 programmes. Nine private HEIs were granted accreditation (including one re-accreditation) as well as two universities. Negative decisions were made with respect to 26 study programmes and 4 HEIs.

Observers' comments:

The Slovenian accreditation system was subject to many changes over recent years and still undergoes changes. These changes disrupt the on-going work and the implementation of the accreditation plan. It also increases doubts of the academic community regarding the actual expectations SQAA has towards them. Nevertheless, the Agency managed to find its course amid this turbulence and continued its operations.

Stakeholders were engaged in the Agency's operations and supported the process of designing accreditation criteria and procedure. As it would seem from discussions held during the observation, recently a significant improvement in the public perception of the Agency was noted.

The legislative infrastructure for programme and institutional accreditation was developed and implemented recently. In general terms it contains all elements necessary to correctly carry out external evaluations of programmes and HEIs. It is mentioned several times that there is the need to stipulate references to the ESG. Full range compulsory programme and institutional accreditations have, in the opinion of the observers, not any rationale behind it because of duplications in many areas and the high costs of conducting both types in parallel. There are also some doubts as to whether the internal quality assurance systems at HEIs are well enough advanced to make institutional accreditation viable. Also somewhat disconcerting is the excessively long period that ex-post accreditation remains valid.

The legal provisions confirm the operational independence of the Agency. Notwithstanding the regulations, the framework and procedures may come under pressure from politicians and the Minister. Indicative of that fact is the case described in the SER, where attempts were made to amend LoHE and restrict the independence of the Agency. In the opinion of the observers the LoHE is too detailed, including the regulations concerning the organisation and operations of SQAA, and the external evaluation and accreditation system.

The Agency's organisational structure is straightforward and the allocation of the decision-making power between individual bodies is relatively coherent. Some doubts are cast over substantial powers of decision given to three members of the Appeals Committee. As legal experts, they have competencies to investigate appeals concerning the violation of accreditation procedure. At the same time, they also examine appeals concerning the contents of SQAA Council's decisions, requiring knowledge about a given study programme or institution.

The evaluation criteria in use predominantly target the educational process, and to a lesser extent the learning outcomes. Due to the substantial number of criteria it may prove challenging

to correctly recognise the criteria that are instrumental in a correct evaluation of educational quality and accreditation of HEIs. The fact that no NQF is in place impedes the determination of correct reference points for evaluating the achievement of the learning outcomes. Nevertheless, the Agency's efforts to evaluate the achieved learning outcomes in the labour market with regard to the employability of students is noted.

The implementation of a training system for experts carrying out accreditation procedures is praiseworthy. Observers were content to find provisions in SQAA's documentation indicating there is a need to integrate the national accreditation system with the European and global system as well as participation of foreign experts taking part in the external evaluation of study programmes and HEIs.

The SQAA policy and accreditation procedures promote an enhancement approach in evaluating internal quality assurance systems. However, the success rate in that area is limited due to the confidential nature of evaluation reports. Hence, not all HEIs are aware of best practices. The fact that these reports are not being published is undoubtedly a serious shortcoming of the Agency.

Apart from the aforementioned, observers rate the information system available to stakeholders and the general public positively. Compared to other European agencies, the Agency publishes system-wide reports analysing its operations and the Slovenian accreditation system to a limited extent.

The Agency's strength is the ability to recognise and rectify, in collaboration with stakeholders, the shortcomings of the accreditation framework.

3.2 Site visit

3.2.1. The expert panel

This section of the observation report is based on the ECA Principles for the Selection of Experts. Here the observations concerning the selection of the expert panel are presented.

Number of panel members: 4

Gender balance The panel led by a chairwoman consisted of two females and two males.

EXPERTISE INCLUDED IN THE PANEL OF THE OBSERVED PROCEDURE

EXPERTISE	INCLUDED
• experience in quality assurance in higher education	Yes
• appropriate academic qualifications and scientific or professional reputation in the relevant area(s)	Yes
• relevant international experience that provides a basis for making	Yes

international comparisons	
• knowledge on teaching and learning methods	Yes
• expertise in development, design, provision and evaluation of higher education programmes	Yes
• knowledge of the country-specific system of higher education, institutions and applicable legislation	Yes
• student representatives in the respective area(s)	Yes/No ¹
• representatives from the labour market	No
• a significant proportion of panel members from outside the country	Yes/No ²

Based on the CVs of experts, they (apart from the student) have substantial pedagogic experience and documented scientific achievements (research projects and publications) in the field of studies that were examined by the panel. Regrettably, there was no written information concerning their experience in external accreditation of programmes and institutions. However, it was gathered from interviews that they participated in accreditation procedures in Slovenia and other countries, and also have experience in building internal quality assurance systems. By holding academic administrative posts in the past, they know the Slovenian higher education system quite well.

3.2.2. The procedure

This section of the observation report is mainly based on the ECA Code of Good Practice. Here the observations concerning the ECA standards relating to the accreditation procedure and standards are presented.

Accreditation procedures are defined in detail in LoHE. Proposals for conducting evaluation procedures and defining criteria were prepared by the Agency in closely collaboration with stakeholders. The Agency itself develops the methodology of implementing procedures and interpreting standards. Hence it may be concluded that the ECA Code of Good Practice standard no 12 is adhered to.

The Agency carries out programme and institutional accreditation according to a predetermined plan. Institutions applying for accreditation submit self-evaluation reports and accreditation procedures envisaging site visits. Appointment of an expert to the expert register is based on substantive competences and independence requirements defined in relevant documents. The documents concerning the accreditation framework aforementioned promote enhancement as the underlying premise of external evaluation of education quality.

Hence, ECA Code of Good Practice standards no 13-16 are adhered to. The meetings of the observers with SQAA representatives and its stakeholders, as well as observations of the panel visiting the University of Maribor confirm that to a great extent. The management is fully aware

¹ There was a student member in the panel but he had a background in the social sciences, not in agricultural or life sciences.

² One panel member was from Croatia, whether this is “significant” is doubtful. Slovenia is a small country meaning that experts are likely to know each other; more international experts would have prevented this.

of inconveniences related to concurrent programme and institutional accreditation, and consequently declared the need for change in higher education legislation.

The site visit by the SQAA expert panel at the University of Maribor was planned for two days and the expert panel worked practically all day. Apart from the aforementioned experts, the SQAA staff also participated in the site visit. One SQAA staff member acted as a secretary and the other two staff members as observers. Neither of them took notes for the experts. The visited institution prepared an extensive self-evaluation report (155 pages in Slovenian, including annexes) which presented basic information about the study programme, scientific research, didactic and scientific infrastructure, very detailed information on facilities, collaboration with businesses and foreign universities, mobility programmes, students organizations and support (tutorship), employees satisfaction survey, lifelong learning, and indicators for environmental impact. The SER was merely descriptive, there was very little in a way of analysis and self-evaluation of that information. Especially missing from the report was an analysis of the evidence required to evaluate to what extent individual criteria were met. The experts, when challenged by the observers, responded that they are not responsible for verifying data and information provided in the SER, and gave the SER authors the benefit of the doubt and assumed it is reliable.

The observers were also provided with a SER written for the purpose of a EUA evaluation. It contained complaints about the long turnaround of initial accreditations and about barriers to align the programme with demands of the labour market.

Some of the meetings with stakeholders were scheduled relatively short, for instance with the Faculty management for only 30 minutes. First an introduction was made by the head of the expert panel followed by a Faculty presentation by its dean. Hence, there was little time left for a questions and answers session. The majority of questions were asked in English. The stakeholders (including students and PhD students) often answered in Slovenian. In our opinion, too many questions were intended to collect additional information. Queries about the quality assurance system were not very specific. Meanwhile the institution's answers proved a lack of internal QA activity such as the existence of a quality manual, and functionality of the QA structures. Some doubts could also be cast whether all questions were asked to the right stakeholders and whether some panel members were too directive in their questions. Phrases like the university "should, must, need to" were sometimes used. In general, however, from our perspective the panel was well prepared for the site visit and their questions were targeted at evident shortcomings of the didactic process and its outcomes. For instance, the panel attempted to explore the reasons for low graduation rates and the consequences of contracting many teachers delivering their classes over long hours at once.

Observers also noticed that the student member was rather passive, even during meetings with students and PhD students. The chairperson did not delegate to him her function for those sessions as opposed to what is common practice in other accreditation panels.

Apart from meetings with stakeholders, experts also closely inspected the didactic, scientific and research infrastructure.

3.2.3. Learning Outcomes

How and by what means is the assessment of achieved learning outcomes taken into account during the procedure?

During the site visit, the SQAA experts were predominantly interested in the educational process. They also asked about learning outcomes. High drop-out rates among students and PhD students as well as low graduation rates were their particular interests. It was also asked if the Faculty surveyed its graduates in employment. How are suggested changes introduced to the curriculum etc. It was not always clear, however, to which education cycle questions concerning learning outcomes were referring. The reason would probably be that there is no NQF in place. The observers noticed, that in the self-evaluation report for EUA, learning outcomes were not analysed and perhaps this term was not used even once.

During the first day of the site visit, the expert panel did not review exam or final papers and did not investigate how the HEI analysed the learning outcomes achieved during the course of studies.

3.2.4. ECA Code of Good Practice: standard 14

<i>Standard</i>	The accreditation procedures must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site)
<i>Question</i>	- <i>How is the accreditation procedure structured?</i>
<i>Reference points</i>	<ul style="list-style-type: none"> - Self-documentation/-evaluation and external review are part of the accreditation procedure - External reviews encompass on site visits at the higher education institutions - The external review team is instructed clearly about its tasks - The accreditation organisation provides specific regulations in case of ex ante-accreditations

The procedure and practice of external evaluation of education and accreditation is similar in many areas to that used by other agencies. It comprises the aforementioned stages, criteria and tools of evaluation. The agency is subject to different regulations concerning ex-ante and ex-post evaluation. Centrepiece for evaluation is the SER report, the analyses and the site visit results contained in the post-visit report. The HEI has every right to submit amendments to the evaluation report and to make an appeal against the decision of the SQAA Council.

The observers did not manage to find in the site visit programme an item for briefing the external review team by SQAA employees. However, the experts are put through extensive training when applying for the status of SQAA registered expert. Students are trained by the students union and SQAA.

3.2.5. ECA Code of Good Practice: standard 15

<i>Standard</i>	The accreditation procedures must guarantee the independence and competence of the external panels or teams
<i>Question</i>	<ul style="list-style-type: none"> - <i>How is the independence of external panels guaranteed?</i> - <i>Are selection criteria for expert panels set up?</i>
<i>Reference points</i>	<ul style="list-style-type: none"> - Selection criteria for external panels/expert committees are set up and published by the accreditation organisation. - Selection criteria assure competence and independence of external experts - Independence of the experts is assured by a written statement - The decision about the composition of the expert team is made by the accreditation organisation in a transparent way

The criteria for selecting experts/external panels and the guidelines for their roles are described in detail in LoHE and the manual for experts. Both documents are available on the SQAA website. The Official Gazette of the Republic of Slovenia (No 95/10 with amendments) has published the Criteria For Entry in the Register of Experts. Experts are recruited through a public call, and take mandatory training. Training aid is published on the SQAA website SQAA and in the Training Manual for Candidates for Entry into the Register of Experts. Experts also sign a confidentiality statement, declare to abide by impartiality rules, avoid conflicts of interest, and work in a professional and independent manner. A detailed ethical code compulsory for experts is spelled out in the Code of Ethics written in collaboration with experts.

Article 51u LoHE states that the panel shall consist of at least three experts, including at least one foreign expert and one student. Specific expert panels for evaluating a given programme or institution are assembled autonomously by SQAA.

In the observers' opinion SQAA has in place a coherent recruitment system for experts, an extensive training programme, the tools assuring their formal independence and a code of ethics. However, as previously mentioned - and students confirmed to observers - sometimes experts are in informal relationships with employees of the evaluated HEI. This is because of the small scale of the Slovenian HE system and those who are evaluated may evaluate the experts later on in another procedure. There is one case of exerting pressure on the expert panel mentioned in the SER. More involvement of foreign experts could solve this issue.

3.2.6. ECA Code of Good Practice: standard 16

<i>Standard</i>	The accreditation procedures must be geared at enhancement of quality
<i>Question</i>	- <i>Which elements and mechanisms within the accreditation process are used to enhance quality at the higher education institution?</i>
<i>Reference points</i>	<ul style="list-style-type: none"> - The accreditation process contains elements that promote quality development and improvement of the higher education institution - The accreditation process should respect autonomy, identity and integrity of the higher education institutions

In many documents SQAA declares its dedication to quality enhancement or even quality culture. For instance, article 51f LoHE states that SQAA is supposed to collaborate with HEIs and higher vocational colleges, „advise them and promote the implementation of self-evaluation.” One of the interim strategic goals is „strengthening quality culture in higher education”. HEI

representatives during the meeting with observers said that the Agency has influenced universities to put together the strategic planning. The main driver behind implementation seems to be recommendations provided by the evaluation report. For instance, in an evaluation report from an institutional evaluation of the University of Primorska supplied to observers, numerous (over 40) "suggestions for improvements" were formulated which concerned the aforementioned 6 areas of external evaluation. During the site visit at the University of Maribor we came under impression that in meetings with stakeholders, that aspect of accreditation was the "leitmotiv" for discussions. We did not note anything in either the procedure or expert panel's work what could be indicative to threatening the autonomy of the HEI.

3.2.7. ECA Code of Good Practice: standard 17

<i>Standard</i>	The accreditation standards must be made public and comply with European practices taking into account the development of agreed sets of quality standards
<i>Questions</i>	<ul style="list-style-type: none"> - Which are the quality standards and criteria used for accreditation procedures? - Do they meet international standards?
<i>Reference points</i>	<ul style="list-style-type: none"> - The quality standards and criteria used in the accreditation procedures correspond to European good practices - The quality standards and criteria are made public - The process of formulation of the quality standards and criteria is transparent and involves all important stakeholders

As mentioned before, SQAA pays great attention to internationalisation of its conduct, operations and the entire accreditation system in Slovenia. Article 51f of LoHE declares that the Agency „shall cooperate with international institutions or bodies for quality assurance and oversee the conformity of the Agency’s operations with EU guidelines and international principles in the field of quality assurance. Among strategic objectives are “encouraging the quality of transnational education”, and “admission to international associations (ENQA and EQAR)” (SER p. 4). Agency representatives in talks with the observers declared their strong intent to implement actions which would award SQAA international recognition. Also the stakeholders, namely representatives of the Ministry of Education in the meeting with observers expressed their desire for the quickest possible confirmation that all international quality standards are satisfied by SQAA, thus allowing it to become a member of ENQA and EQAR. HEIs perceive internationalisation of the accreditation system as an opportunity to increase their visibility on the international arena.

The Agency implemented benchmarking in collaboration with foreign agencies operating for the benefit of education quality. It is also member of several European and non-European networks, e.g. ECA and CEENQA. SQAA representatives take part in implementing the JOQAR programme. The Agency coordinated the JOQAR evaluation of a joint master study programme Migration and Intercultural Relations implemented by an international consortium of 7 HEIs. It currently participates in the CeQulnt project.

Internationalisation of education may be made more difficult by the aforementioned provisions of the national legislation, explicitly mentioning that students should be provided classes in Slovenian. Therefore one cannot organise classes in English unless there is an equivalent in Slovenian.

In summary, it may be unequivocally concluded that quality standards adopted by SQAA are consistent with international standards defined for the EHEA. These standards were formulated in cooperation with stakeholders, are published and available to the general public. Based on the observation of the expert panel at the University of Maribor the observers conclude that declared quality standards are in fact used in accreditation practice.

4. Recommendation to the MULTRA members

The Slovenian system for accreditation and externally evaluating quality and accreditation, as well as SQAA practices have some characteristics reflecting the national context in which it operates. Missing are the publication of evaluation reports, and a focus on learning outcomes based on a implemented NQF. The accreditation system is still subject to changes and one would hope that these deficiencies are soon to be removed. Our report, however, is clear as to the fact that overall the Slovenian system and SQAA practices are not significantly different from accreditation systems and practices of agencies being members of ECA. There are also strong points such as the current emphasis on training of experts and quality enhancement. Hence, the observers are of the opinion that at the current stage of its development SQAA observes the ECA Code of Good Practice standards to a great extent, is actively involved in international projects, and should be allowed to sign MULTRA.

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www.eacaconsortium.net

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