

**Approval of the Application**  
**by the Slovenian Quality Assurance Agency for Higher Education**  
**(SQAA) for Renewal of Inclusion on the Register**

**Register Committee**  
 3 April 2019

Ref. RC23/A62

Ver. 1.0

Date 10/4/2019

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<b>Application of:</b>	15/11/2017
<b>Agency registered since:</b>	23/10/2013
<b>External review report of:</b>	11/01/2019
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Jean-Marc Rapp (chair), Michèle Wera (secretary), Mirko Savic, Marija Vasilevska
<b>Decision of:</b>	03/04/2019
<b>Registration until:</b>	31/10/2023
<b>Absented themselves from decision-making:</b>	Izabela Kwiatowska-Sujka
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 08/12/2017</a></li> <li>2. <a href="#">External Review Report, 11/01/2019</a></li> <li>3. <a href="#">Applicant's statement on the report, 11/01/2019</a></li> <li>4. <a href="#">Request to the Review Panel, 14/03/2019</a></li> <li>5. <a href="#">Clarification by the Review Panel, 15/03/2019</a></li> </ol>

1. The application of 15/11/2017 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 08/12/2017.
3. The Register Committee considered the external review report of 11/01/2019 on the compliance of SQAA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered SQAA's statement on the external review report.
5. The Register Committee sought and received clarification from the chair of the review panel.

### Analysis:

6. In considering SQAA's compliance with the ESG, the Register Committee took into account SQAA's activities within the scope of the ESG:
  - initial accreditation and re-accreditation of higher education institutions, including the accreditation of various changes to higher education institutions;
  - accreditation of new study programmes;
  - external evaluation and extraordinary evaluation of higher education institutions;
  - external evaluation and extraordinary evaluation of study programmes, including evaluation of a sample of study programme;
  - assessing the requirements for entry of transnational higher education to the SQAA register;
  - accreditations of international joint programmes;
  - notifications of international joint programmes and programmes of the international associations of universities accredited abroad.
7. The Register Committee found that the report provides sufficient evidence and analysis on SQAA's level of compliance with the ESG.
8. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

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### Analysis:

9. The Register Committee found that the report provides sufficient evidence and analysis on SQAA's level of compliance with the ESG.
10. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

#### **ESG 2.1 – Consideration of internal quality assurance**

11. In its decision of October 2013 to admit SQAA to the Register, the Committee flagged for consideration whether SQAA paid greater attention to higher education institutions' internal quality assurance systems.
12. The Register Committee considered that the revisions of SQAA's standards and the shift to institutional accreditation addressed the flag. The Committee therefore concurred with the panel's conclusion that SQAA complies with the standard.

### ESG 2.3 – Implementing processes

13. The implementation of follow-up procedures was flagged for attention when SQAA was admitted to the Register.
14. The review panel considered there was a lack of a formal follow-up by SQAA to “touch base with HEIs” before the next cyclical re-evaluation/re-accreditation in case of unconditionally positive decisions. The Register Committee further took note of SQAA’s response to the review report, setting out its approach to monitoring higher education institutions’ internal quality assurance systems during the re-accreditation cycles.
15. **The Register Committee accepted that this constitutes a form of follow-up and was therefore able to concur with the panel’s conclusion that SQAA complies with the standard. The Committee nevertheless considered that the corresponding flag was only partially addressed and encouraged SQAA to seriously consider the panel’s recommendations.**

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### ESG 2.5 – Criteria for outcomes

16. Following the review panel’s analysis that SQAA’s criteria for assessment were not always clear and left room for interpretation, the Register Committee sought and received clarification from the panel on its conclusion as to the present standard.
17. The Register Committee understood that SQAA’s criteria were by and large perceived as clear, and that these remarks related to some – but not all or the majority of – criteria. It became clear that the panel’s findings were more nuanced than the language might have suggested.
18. **Having considered the clarification, the Register Committee was able to concur with the panel’s conclusion that SQAA complies with the standard.**

### ESG 2.6 – Reporting

19. SQAA’s publication practice was flagged for attention when the agency was admitted to the Register.
20. The review panel found that the website of SQAA was not updated regularly and, therefore, a significant number of reports or decisions were not published in a timely manner or difficult to access.
21. The Register Committee noted that SQAA has since then launched its new website, which, according to SQAA’s statement, addresses the issue. **While all reports now seem to be available on the website, the**

next external review of SQAA should analyse in detail whether the new website took full account of the shortcomings identified by the panel.

22. The review panel further noted that reports from initial accreditation procedures with a negative outcome are not published and rightly stated that the publication of all reports is required by the ESG, in order to ensure full transparency.
23. While SQAA's statement on the report held that all "reports (with the positive and negative outcomes)" were now accessible, it was not clear whether SQAA officially changed its policy to that effect. The Committee was unable to verify whether reports on initial accreditation procedures with a negative outcome were now published.
24. **The Register Committee therefore concurred with the panel that SQAA only partially complies with the standard.**

#### ESG 3.3 – Independence

25. The Register Committee obtained clarification from the panel concerning the remarks in the review report that the independence of the agency was not always fully understood by the Slovenian authorities, that "the Ministry might have interfered with the agency's work" and that "the private HEIs mentioned some cases of inconsistency and partiality" in SQAA's decisions.
26. The Register Committee understood that the type of interference that had occurred (i.e. refusal to enter two accreditation decisions into the register maintained by the government) was now ruled out following changed responsibilities, with the register being under SQAA's control, thus strengthening the agency's independence. The Committee further noted that the panel found that the accusations by some private HEIs were not substantiated.
27. **Having considered the clarification by the panel, the Register Committee was able to concur with the panel's conclusion that SQAA complies with the standard.**
28. **Given the perceptions of private HEIs described here as well as considering the less developed involvement of stakeholders from private HEIs (see under ESG 3.1 in the review report) the Register Committee, however, underlined that SQAA should take serious this matter and the corresponding recommendations by the review panel.**

#### ESG 3.4 – Thematic analysis

29. The Register Committee considered the panel's analysis as well as SQAA's statement on the panel report, referring to its recently

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published “methodology and procedure for drafting and disseminating system-wide and thematic analyses”.

- 30. While the Committee welcomed the steps taken by SQAA to swiftly address the panel’s recommendation, their actual implementation remains to be analysed within the next external review of SQAA.
- 31. **The Register Committee therefore concurred with the panel’s conclusion that SQAA partially complies with the standard.**

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**ESG 3.5 – Resources**

- 32. When SQAA was admitted to the Register in 2013, the financial sustainability of the agency after the cease of the funding from the European Social Fund (ESF) was flagged for attention.
- 33. **The Register Committee welcomed that the flag was addressed, as already determined in its decision of 18 March 2016 to take note of SQAA’s Substantive Change Report of January 2016.**

**ESG 3.6 – Internal quality assurance and professional conduct**

- 34. When admitting SQAA to the Register, the Committee noted the 2013 panel’s recommendation that SQAA systematise its internal quality assurance processes.
- 35. According to the panel’s report, SQAA has further systematised its internal quality assurance system.
- 36. **The Register Committee, however, also noted the review panel’s critical appraisal of SQAA’s interaction with the different stakeholders from different types of higher education institutions, and the question raised whether its quality policy was shared by all stakeholders. The Committee therefore considered that the flag was partially addressed and concurred with the panel’s conclusion.**
- 37. For the remaining standards, the Register Committee was able to concur with the review panel’s analysis and conclusion without further comments.

**Conclusion:**

- 38. Based on the external review report and the considerations above, the Register Committee concluded that SQAA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Substantial compliance	Compliance

2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Substantial compliance	Compliance
2.6	Partial compliance	Partial compliance
2.7	Substantial compliance	Compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Partial compliance	Partial compliance
3.5	Substantial compliance	Compliance
3.6	Partial compliance	Partial compliance
3.7	(not expected)	Compliance (by virtue of applying)

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39. The Register Committee found that SQAA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee considered that these are specific and limited issues, and that SQAA was on a good way of addressing some of them, e.g. ESG 3.4. The Committee therefore concluded that SQAA continues to comply substantially with the ESG as a whole.
40. The Register Committee consequently renewed SQAA's inclusion on the Register. SQAA's renewed inclusion shall be valid until 31/10/2023<sup>1</sup>.
41. The Register Committee further underlined that SQAA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity as well as to inform EQAR through Substantive Change Reports where required.

<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

Slovenian Quality Assurance Agency for Higher Education (SQAA)

Ivan Leban,  
Slovenska c. 9

1000 Ljubljana  
Slovenia

Brussels, 8 December 2017

## Confirmation of Eligibility: Application for Inclusion/Renewal of Inclusion on the Register

Application no. A62 of 15 /11/2017

Dear Ivan,

We hereby confirm that the application by for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of are within the scope of the ESG:

- *initial accreditation and re-accreditation of higher education institutions;*
- *accreditation to new study programmes;*
- *accreditation of external evaluations;*
- *external evaluation and extraordinary evaluation of higher education institutions and study programmes (including evaluation of a sample of study programme)'*
- *transnational higher education/cross-border education.*
- *notifications of internationally accredited joint study programmes and notification of study programmes of the international association of universities EMUNI.*

We further confirm that the following activities are not separate external quality assurance activities, but they might be relevant in relation to the agency's regular external QA activities as follows:

- *accreditation of various changes to higher education institutions.*

We understand that this is not a separate activity in its own right but a monitoring or follow-up activity carried out as part of SQAA's regular external QA procedures and it should thus be addressed

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as part of SQAA's corresponding accreditation or evaluation procedure.

- *periodic training of the agency's expert evaluators*

We understand that this activity is not an external QA activity per se but might be relevant in relation to ESG 2.4.

To that extent they should be taken into account in SQAA's self-evaluation and external review report.

Please ensure that 's self-evaluation report covers all the aforementioned activities.

Furthermore, the self-evaluation report and external review report should also address the implementation of the European approach for QA of Joint Programmes as well as (if the case) how SQAA's ensures that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG, especially in case the agency is not registered on EQAR.

We further remind you that the following issues were flagged when was admitted to the Register, and should be addressed in your self-evaluation report and the external review report:

#### **ESG 2.1 Consideration of internal quality assurance – [ESG 2005: standard 2.1]**

The review panel recommended that SQAA strengthens the attention to higher education institutions' internal quality assurance systems, in the context of the planned shift towards external quality assurance predominantly at the institutional level.

The Register Committee noted the recommendation and underlined that greater attention to internal quality assurance systems would be important in paving the way for the planned transition from programme to institutional accreditation in 2017.

#### **ESG 2.6 Reporting [ESG 2005: standard 2.5]**

The Register Committee received clarification from SQAA on its Council's decision to publish the expert groups' assessment reports once the decision on accreditation is final.

Since publishing of reports has yet to become practice, the Register Committee underlined that this will need to be addressed in the next external review of SQAA.

#### **ESG 2.3 Implementing processes / ESG 3.4 Thematic analysis [ESG 2005: standard 2.6 & 2.8]**

Given that SQAA is in the first evaluation and accreditation cycle, the Register Committee acknowledged that the follow-up procedures and

system wide-analyses could not possibly have been fully implemented in practice yet.

These two matters thus require further attention and will need to be addressed in the next external review of SQAA.

### **ESG 3.5 Resources [ESG 2005: standard 3.4]**

The Register Committee noted the review panel's concerns with regards to the financial sustainability of the agency after the cease of the funding from the European Social Fund (ESF) in 2014.

The Register Committee underlined that SQAA is expected to submit a Substantive Change Report (see §6.1 of the EQAR Procedures for Applications) once the funding situation has changed, including an analysis on how the sustainability of SQAA's funding will be ensured.

### **ESG 3.6 Internal quality assurance and professional conduct [ESG 2005: standard 3.8]**

The Register Committee noted the panel's analysis that SQAA lacks a coherent and formalised internal quality assurance framework, and the corresponding recommendation of the panel that SQAA systematise its internal quality assurance processes.

We confirm that *consultation with various stakeholders* in the form of Q&A (questions and answers) with agencies is not an activity within the scope of the ESG. In case of consultancy services, SQAA is expected to ensure a clear separation between such activities and the agency's assessment procedures<sup>1</sup>.

While this activity is not relevant to your application, it is SQAA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

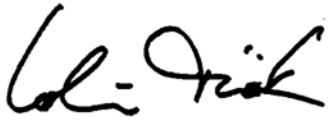
We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is 's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

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<sup>1</sup> see Annex 5 of the Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies  
[https://www.eqar.eu/fileadmin/documents/eqar/official/RC\\_12\\_1\\_UseAndInterpretationOfTheESG\\_v2\\_0.pdf](https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf)

Yours sincerely,



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(Director)

Cc: ENQA

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## **SQAA RENEWAL OF MEMBERSHIP IN EQAR**

### *Distinguished President of the EQAR, dr. Karl Dittrich and Honored Members of the EQAR Register Committee*

The Slovenian Quality Assurance Agency for Higher Education (hereinafter: the Agency/SQAA) received the final ENQA review report on Friday 14 December 2018 and the decision on renewing its membership in ENQA on 21 December 2018. The Agency is of opinion that the findings and recommendations for the improvement of the Agency's work will contribute to the common understanding and development of quality standards and their dissemination among all stakeholders in the Slovenian higher education area.

As evident from the final ENQA review report, the review panel concluded that the SQAA operations are fully compliant with 3 ESG standards (3.2 official status, 3.7 Cyclical external review of agencies, 2.1 consideration of internal quality assurance), substantially compliant with 8 ESG standards (3.1 Activities, policy and processes for quality assurance, 3.3. Independence, 3.5 Resources, 2.2 Designing methodologies fit for purpose, 2.3 Implementing processes, 2.4 Peer-review experts, 2.5 Criteria for outcomes, 2.7 Complaints and appeals) and partially in compliance with the 3 ESG standards. According to the ENQA review, the partial compliance is evident from the Agency's operations in the areas of standards 3.4 Thematic analysis, 3.6 Internal quality assurance and professional conduct and 2.6 Reporting.

Despite the fact that, after receiving the first draft of the ENQA panel's review report, we prepared a comprehensive reply on factual errors and thoroughly explained the actual state of affairs, we regret that the group of experts could not take into account all of our arguments and the progress made on the basis of our self-evaluation findings and on the findings of the ENQA review when preparing the final review report. That is why we would like to emphasize a few significant facts below.

In the field of **Thematic analysis (ESG Standard 3.4)**, the Agency has clearly defined the methodological framework for the preparation of the thematic analysis in the very document entitled "Quality in the Slovenian Higher Education and Higher Vocational Education Area in the Period from 2014 to 2017". Nevertheless, the ENQA panel in its report pointed out that *The target-audience remains vague. In addition, it is not apparent that the outcomes were discussed with stakeholders.* We point out that the results of the system wide analysis were presented to different stakeholders and discussed on different occasions (at 8 training events of NAKVIS experts organized already in November and in December of 2017 and in February and March of 2018), at meetings with the members of the Agency Council, at the meetings with the representatives of the quality commissions from universities and independent higher education institutions. System analysis as such enables the preparation of individual thematic analysis that have been prepared at the proposal of various external stakeholders and are published on the agency's website ([www.nakvis.si](http://www.nakvis.si)). These analysis were created as a result of feedback from visits by the Director of SQAA to HEI's.

The ENQA Review Panel proposal (The panel recommends SQAA developing a method for the production and dissemination of the thematic analyzes on issues that are relevant to its stakeholders) took SQAA seriously and adopted (in August 2018) a special document entitled - Methodology and procedure for drafting and disseminating system-wide and thematic analyzes, which clearly defines the purpose, the procedures for preparing individual reports, stakeholder involvement and dissemination of results.

The drafting of the 2014 - 2017 system analysis took several months due to its complexity; it was completed in early March 2018. It examined all self-evaluation reports of HEI's/HVC's and expert reports in this period. Before its completion, the findings of the analysis were presented to the Agency experts - as well as to some teachers at HEI's and HVC's, students and representatives of employers - at the training courses organised by the Agency in the autumn of 2017 and in the spring of 2018 (8 courses in total, average participation 25 experts per course). In addition, it was sent to 321 addresses (head offices of HEI's and HVC's, Agency experts, teachers at HEI's and HVC's, student councils of HEI's and the Student Organisation of Slovenia). The Agency began collecting initiatives for detailed presentations of results only when this general system analysis had been presented to stakeholders. The first initiative was about a detailed analysis in the field of human resources, i.e. pedagogical and research work and working conditions of higher education teachers and researchers (published in Slovene at <https://www.nakvis.si/wp-content/uploads/2018/11/Kakovost-kadrov-v-slovenskem-visokem-%C5%A1olstvu-v-letih-od-2014-do-2017.pdf>). The Agency now has an extensive base of results that can be analysed comparatively and in detail. The mechanism for external stakeholders to make initiatives for the elaboration of specific analyses by specific variables has been determined. The Agency will be attentive to not introduce the practices of scaling, but to attempt to anonymously show the good sides of higher education in Slovenia and the opportunities for improvement.

As already mentioned above the SQAA adopted the document *Methodology and procedure for the production and dissemination of thematic analyses* (published in Slovene on SQAA's website: <https://www.nakvis.si/analize-in-publikacije/sistemske-in-tematske-analize/> please find English version enclosed) which defines precisely the procedure of system analysis and frameworks of dissemination of the findings of system analyses and the influence of external stakeholders on the elaboration of further detailed analyses (thematic analyses). The document clearly defines the target group of these analyses although this can be inferred from its results. The latest system analysis defines the process of work and methodology as well as its own purpose in great detail.

In October 2018 the SQAA organised special meeting with representatives from HEI's and HVC's in order to present the results of analysis in more detail. We will also present it at the annual international conference in May 2019.

The Agency established the Department for Analyses, International Cooperation and Informatisation of the Agency - one of the main tasks of the department being thematic analyses.

Regarding the compliance of the SQAA operations with the **ESG 3.6 Standard (Internal quality Assurance and professional conduct)**, we would like to emphasise, that the finding that the Agency Council members do not participate in the preparation of the self-evaluation report of the Agency is incomprehensible. The Agency's Council is the one that considers and adopts the Agency self-evaluation report (which is also evident from the minutes of the Agency Council meetings). The Agency Council considered the last self-evaluation report at the 121st and 122nd meetings, and issued the consent to it at its 122nd meeting, on 15 February 2018 (evidence: minutes of the meetings).

The Agency strives from year to year to improve the communication among stakeholders even further, which is evident from all self-evaluation reports. Although the communication has considerably strengthened in the last self-evaluation period (more than six months of harmonisation in the development of the new criteria with dedicated workshops, more frequent meetings with stakeholders, counselling to HEI's/HVC's at regular visits ...), we are aware of additional possibilities for improvement. Despite strongly increased cooperation and consideration of stakeholders suggestions, some are of opinion that they have not received enough information on the consideration of their comments, and despite published self-evaluation reports, analysis of surveys, information on all important events etc. some stakeholders emphasize that they would like to be even better informed about the activities and operation of the Agency. Therefore the SQAA instantly adopted the recommendation of ENQA panel that the key opportunity for improvement is the strengthening of communication with all stakeholders. We are aware that this is the only way for the Agency to improve its own visibility among stakeholders and the visibility of its work, contribute to strengthening of the quality culture, its own reputation in the general public and awareness that the Agency is an equal partner in the Slovenian and International higher education area. The SQAA immediately took action to improve the situation, established links with external communication experts and, in cooperation with them, prepared a communication plan and a plan of implementation activities to improve communication. The communication plan thus clearly defines both internal and external stakeholders, communication channels, form of communication, and places a special emphasis on two-way communication (enclosed). Mid December SQAA issued new website ([www.nakvis.si](http://www.nakvis.si)), that is fully accessible for blind, partially sighted, people with visual impairments and people with special needs. For that the SQAA was also rewarded with the Certificate for web accessibility. Since the improvement of communication and collaboration is one of the SQAA's main priorities, we are developing also new communication protocol (for internal and external communication) and rewriting the Quality manual in order to ensure adequate feedback mechanisms in the SQAA procedures and operations.

In regard to compliance with **ESG Standard 2.6 Reporting** the ENQA review panel found the major drawback in the old agency's website, that was not up-to-date and according to the panel, not all reports were published. The ENQA panel was already informed at the time of the site-visit that the Agency's website will be fully refurbished and at the same time fully adapted and accessible for people with special needs. In order to meet the WCAG 2.0 standards, the launch of the new website was delayed in early December 2018. Simultaneously with the updated and renewed website, we also ensured the complete availability of web content for blind and visually impaired people and for people with reading disabilities. As the first in the public sector in Slovenia, we also received a Certificate for web accessibility, on which we are especially proud. The entire content of the website is user-friendly, accessible, regularly updated (including accreditation and evaluation reports and decisions of the Agency's Council) and easy to use.

Together with the confirmation of the ENQA membership, the SQAA received recommendations for improvement in the individual areas of the Agency's activities. The recommendations refer to the following standards that we would like to address below:

### **ESG 3.1 Activities, policy and processes for quality assurance**

SQAA is recommended to explore ways to ensure the full commitment of all stakeholders to the external quality assurance process.

#### **SQAA explanation:**

The manner of work of the Agency is evident from the provisions of the ZViS governing the accreditation procedure, from the General Administrative Procedure Act (ZUP) and the Council Rules of Procedure as well as from the Rules of Procedure adopted by the Agency. The decision-making procedure of the Agency Council at meetings is therefore prescribed and formalised. In accordance with the adopted communication plan, Council members will be involved in follow-up procedures (site visits), namely the evaluation of sample study programmes whose principal purpose is the strengthening of the advisory function of the Agency and thus the assistance in the development of quality systems at HEI's/HVC's, and the strengthening of the quality culture. Evident from the communication plan are also other activities contributing to a greater involvement of the Council members in the communication with external stakeholders and thus further increasing the visibility of the Agency in Slovenia's higher education area (see communication plan and implementation plan with timetable enclosed).

We emphasise that SQAA cooperated with all stakeholders (HEI's - including the Union of Independent HEI's, HVC's, Agency experts and other internationally renowned experts, students, ministry competent for higher education) in the process of harmonisation of draft Agency Council acts, which lasted for several months. The harmonisation process took place electronically, at meetings and workshops organised by the Agency (the workshops were attended by representatives of all stakeholders as well as by the Agency Council members and experts). The stakeholders were acquainted with the remarks to be observed and not observed, and the reasons why. We promptly e-mailed them amended versions of the Criteria in which amendments were visibly marked in accordance with their remarks. As documents were many, we regret that the ENQA panel did not establish this in the course of its visit. Since some stakeholders pointed out in discussions with the ENQA panel that they believe, despite the above, that they had not received appropriate feedback, the Agency immediately undertook the resolution of this challenge and prepared, with the help of external experts, a comprehensive communication plan together with an implementation plan with a timetable in order to prevent similar communication disruptions in the future.

### ESG 3.3 Official status

SQAA is recommended paying due attention to maintaining the agency's independence and making good use of the available instruments.

#### **SQAA explanation:**

In order to ensure a stable legislative environment, we decided to draft an autonomous act on the Agency that will not be affected by the adoption of other legislation and to ensure the agency's independence for the future.

### ESG 3.4 Thematic analysis

SQAA is recommended to develop a method for the production and dissemination of thematic analyses on issues relevant to its stakeholders.

**Please refer to an explanation given above.**

### ESG 3.5 Resources

SQAA is recommended to ensure the necessary funding for the implementation of its strategy plan and subsequent action plans, including a staff development plan.

#### **SQAA explanation:**

Having received the draft report of the ENQA panel, we prepared the human resource development plan (enclosed in Slovene) whose drafting included both employees and the Agency Council members. The human resource development plan was also based on the analysis of questionnaires completed by all employees. The questionnaires again examined the workload of the employees, fields of work, wishes and expectations concerning their further professional and expert development, motivation and proposals concerning education and training. The preparation of the human resource development plan and the plan of reorganisation of the Agency work was also influenced by the results of the analysis of the number of cases addressed by the Agency. These indicate that the number of cases has considerably decreased with the systemic change of the ZViS and the new Accreditation Criteria.

	<b>BEFORE per year</b>	<b>NOW per year</b>
Reaccreditations of HEI's	50/7=7	50/5=10
Reaccreditations of programmes	700/7=100	0
Sample accreditations	0	2% of 700=14
Accreditations of new HEI's and programmes	20	20
<b>TOTAL</b>	127	44

The table shows a sharp drop in the number of addressed cases (by 2/3). This enables an essential shift to the quality of work, thematic analyses, development of ICT, improvement of communication and international cooperation (both in terms of human resources and finance). The human resource analysis showed that we needed a new IT specialist - we employed him in early September. We estimate that other management plans can be carried out with the

existing staff or by an additional employment of another employee, for which **we have enough available funds within the existing resources.**

### **ESG 3.6 Internal quality assurance and professional conduct**

SQAA is recommended to include external stakeholders more directly in the internal evaluation and quality improvement activities of the agency. Also proper feedback should be provided to better inform stakeholders about the results of surveys/actions taken by the agency. In addition, SQAA is recommended to involve all its bodies in the conception and the implementation of its internal quality assurance policy. The agency's council as the highest decision-making body could lead the way and play a more active role.

**Please refer to an explanation given above.**

### **ESG 2.2 Designing methodologies fit for purpose**

SQAA is recommended to apply the adopted methodology with a maximum of flexibility ensuring its fitness for purpose for all Slovenian institutions regardless of size and profile. If need be, the methodology should be revised in order to make it more effective. In addition, SQAA is recommended to focus on quality enhancement rather than quality control, and to foster further development of a quality culture within Slovenian higher education.

#### **SQAA explanation:**

When harmonizing the drafts of the new SQAA Criteria we invited universities and independent higher education institutions, rector's conference, students as well as Agency experts to participate in the development of the new criteria; the development also involved representatives of quality committees at HEI's etc. The harmonization lasted for several months, two full-day workshops were organised (on 19 and 25 April 2017) and also interested stakeholders were invited to the Council meetings (in June 2017) organised for this very purpose.

As mentioned, we believe that the stakeholders' concern about too lengthy and overly bureaucratic procedures (mentioned in the report) refers to the old criteria. At the moment, namely, we cannot speak of the full integration of the new criteria as the Agency has only just initiated accreditation and evaluation procedures after the introduction of the new system. **By enhanced communication strategy**, we will regularly monitor the applicability of the criteria and adapt them when necessary and in agreement with stakeholders. To facilitate understanding, we supplemented FAQ's (<https://www.nakvis.si/akreditacije-in-evalvacije-v-visokem-solstvu/pogosta-vprasanja-in-odgovori/>), while planning to prepare, after the successful integration of the criteria, **the Guide to Accreditation and Evaluation Procedures** that will take into account the ENQA panel recommendations. The Guide will replace the Manual for Agency Experts. Let us emphasise that until now, **the HEI's/HVC's have not had any difficulties in understanding the contents of the new criteria and completing the applications, while there was a great deal of misunderstanding of the old criteria.** We are convinced that this is also due to the long-term cooperation with them in the creation of the criteria and the provisions on the assessment of individual quality standards specified in the application forms. The Agency has also started to prepare accreditation and evaluation rules of procedure where the process of addressing an application is presented to all interested parties in a transparent and clear way. The use of the eNakvis information system is expected to simplify administrative procedures and increase the focus on the contents of decision-making. At the SQAA website there is publicly available information about all processed applications with exact the phase of procedure (<https://www.nakvis.si/akreditacije-in-evalvacije-v-visokem-solstvu/seznam-visokosolskih-zavodov-in-studijskih-programov-v-postopku/>).

### ESG 2.3 Implementing processes

SQAA is recommended to determine the nature of the follow-up in its quality assurance processes, and not only in external assessments with a negative outcome. Furthermore, SQAA is recommended to develop a shared understanding of criteria and publish the official interpretation of the criteria and regulations.

#### **SQAA explanation:**

**The finding** that the only form of regulated follow-up is the external assessment with a negative outcome **is incorrect**.

By changing the quality system, amendment to the ZViS and changing its own criteria, the Agency successfully integrated follow-up in its procedures. **The most important is, of course, the evaluation of a sample study programmes intended for continuous monitoring of improvements: its purpose is the review and assessment of follow-up measures and counselling to institutions. The objective of the sample evaluation is not re-accreditation of study programmes but their continuous monitoring and improvement. Besides evaluating the sample,** the Agency continuously monitors the improvement of the quality of institutions **by collecting and analysing their self-evaluation reports, while the results of the analysis are published in the system analysis**, which was and will be presented to stakeholders in a suitable manner. Let us explain that the progress and development of HEI's/HVC's is closely reviewed also in re-accreditation procedures for the entire period since the last accreditation. It is evident from the Criteria that institutions must submit to the Agency the self-evaluation report as well as the document demonstrating the planning of self-evaluation both for the past and the future self-evaluation period. The new Criteria strongly emphasise the assessment of the internal quality system of HEI's/HVC's and the follow-up in this field. **The concern for the monitoring and improvement of internal QA systems at HEI's/HVC's is evident also from precise provisions on the assessment of these standards in application forms** (the provisions also apply in the evaluation of sample study programmes because the same forms are used for it).

### ESG 2.4 Peer-review experts

SQAA is recommended reconsidering the expert pool especially given the introduction of institutional reviews. The expert pool should be sufficiently diverse and include students of all types of Slovenian institutions. Special efforts and extra resources are needed to engage (more) international peers.

#### **SQAA explanation:**

**By changing the Criteria for SQAA Experts,** we thoroughly **changed the procedure of training of candidates for the entry in the register of experts and conditions for the entry and selection of experts**. The training of students has changed so that there is no longer compulsory preliminary training with a final test that was previously done by the ŠOS (Slovenian Student Union), which made the set of students who may apply to a public call for Agency Experts much broader: **the call is now open to all students, both at private HEI's and at HVC's**. We do notice, however, a lack of interest in cooperation especially among students of independent HEI's. These are, namely, mostly older, employed and have families. We see here an excellent opportunity for the Agency to present to students, in the framework of its advisory role, the functioning of the quality system and their role in the system itself, which is indispensable for the successful functioning of all mechanisms.

Moreover, the Criteria for Agency Experts (as already stated in the ENQA draft report) provide that the groups for experts for the assessment of doctoral study programmes include students with PhD candidate status, as they are familiar with the structure, specificities and method of

the third-cycle study, which does not apply to the first and second Bologna cycle students. In Slovenia, this means that most third-cycle students are employed (as young researchers, assistants, or elsewhere).

Before the appointment of a group of experts, a HEI is invited to take a position on the proposed group of experts. If it does not agree with it, it has an option to complain against the proposal for an individual expert and state the grounds for this. Until the decision of the Agency Council (in the context of the response to a report of a group of experts or request for the elimination of an expert) and even after the decision, a HEI shall have an option to appeal on the findings of a group of experts on the grounds of bias, lack of professionalism and conflict of interest of experts. This is provided by the General Administrative Procedure Act (ZUP), which the Agency shall apply in accreditation procedures on the basis of the provisions of the ZViS (Higher Education Act).

We are aware of the problem of comprehensive field coverage by Agency's experts, so we annually invite (by a public call) different experts from shortage fields to cooperate. This problem has been successfully solved by including foreign experts from relevant fields. **The comparison with other (foreign) agencies show that the fees paid to experts are higher or comparable to the fees paid to experts by foreign agencies, and therefore we feel that ENQA's concern in this matter is redundant.**

## ESG 2.5 Criteria for outcomes

SQAA is recommended to encourage institutions to include consistent follow-up procedures in their internal quality assurance system. In addition, SQAA is recommended to formalise the decision-taking process taking into account the different roles and tasks of the expert panel (external assessment report), the agency's director and staff (proposal for decision), and the agency council (formal decision).

### SQAA explanation:

According to the ZUP, the Agency staff are authorised to conduct accreditation and evaluation procedures. They cooperate with groups of experts and with the Agency Council members, they prepare materials and draft decisions for decision-making and attend all Council meetings, where they participate in discussions on procedures they conduct.

**The way of considering the documentation, the way of decision-making, the cooperation with expert services of the Agency and the adoption of decisions are clearly determined by the ZUP, ZViS, Criteria and Rules of Procedure of the Council.**

The discussion at Agency Council meetings is always summarised in minutes that are, however, not published in full at the Agency website. Published at the website are Council decisions, reports of groups or experts, and decisions. Evident from the minutes are the course of procedure, discussions by decision points, and decision adopted by the Agency Council. As already mentioned, the Agency websites published Agency decisions, the full text of decision (from which the opinion of the expert group and the opinion of the Agency Council but also, if the case, the decisions of Appeal Committee are evident) and reports of groups of experts.

To increase the transparency, the Agency Council adopted (end of August 2018) the rules of procedures, which clearly show the way of considering the documentation, the way of decision-making, the cooperation with expert services of the Agency and the adoption of decisions.

We are preparing the **Guide to Accreditation and Evaluation Procedures** intended for the Agency staff and experts as well as for applicants and students, which will enable a maximally transparent insight in the understanding of the criteria and procedures of the operation of the

Agency. The preparation of the Guide was deliberately suspended until the completion of the first procedures of assessment. We reiterate that the procedures carried out under the new criteria have only just begun (the first groups of experts have been appointed), so the question whether the opinion of the ENQA experts is based on the experience of stakeholders with the new criteria or not is justified. We organised two one-day seminars (one in October and one in November 2018) on the presentation of criteria and accreditation and evaluation procedures intended for representatives of HEI's with the purpose of increasing the clarity and transparency of the Agency operation.

### **ESG 2.6 Reporting**

SQAA is recommended to publish all reports including those with a negative outcome in the case of initial accreditation procedures for reasons of transparency and further development. **Please refer to an explanation given above.**

### **ESG 2.7 Complaints and appeals**

SQAA is recommended to specify its complaints procedure as part of its quality assurance system and communicate this procedure more transparently to the institutions.

#### **SQAA explanation:**

As regards the complaints or appeals against individual stages of procedure, the ZUP stipulates the decisions in procedure against which a special complaint may be lodged and which may be challenged only by an appeal against the final decision. Applicants also have other options in procedure by which they can express their disagreement - complaint (request for exclusion, request for entering a procedure, request for the service of decision etc.). The grounds provided by the ESG for a "complaint" are, under Slovenian legislation, the grounds for an "appeal" lodged for essential violations of procedural provisions (a case was decided by a person who should be eliminated; conflict of interests; procedure was not conducted in accordance with the provisions of the ZUP etc.). Any administrative act issued by the Agency Council or by an official conducting the procedure must include instruction on the legal remedy in which a party to the procedure is clearly and precisely informed about the possibilities for lodging legal remedies. This is why there have not been any questions or confusion about the possibility to apply legal remedies in accreditation procedures (which was also confirmed at interviews with stakeholders).

As a special form of alerting and taking action regarding possible inadequacies in the functioning of a HEI or the provision of a study programme, the Slovenian legislative system provides for the institute of extraordinary evaluations. In these procedures, any person can make an initiative to initiate an extraordinary evaluation if he or she considers that the functioning of a HEI, the provision of a study programme or quality assurance system is inadequate (see Articles 51š and 51t of the ZViS). The procedure is described in more detail in the Criteria.

A complaint shall be possible until the decision of the Agency Council (e.g. request for the exclusion of an expert, staff member, Council member; request to enter a procedure as a party, accessory participant); only an appeal shall be possible after the Council decision.

When examining the ENQA draft report, the Agency found that it points out numerous findings with which it fully agrees as well as findings with which it cannot agree. Moreover, the ENQA report contains the same findings under different standards of assessment and these findings are in our opinion, as such, also a reason for a poorer general evaluation of the Agency (e.g.

response of individual stakeholders that they did not participate in the preparation of the Agency criteria or did not receive any feedback on the comments submitted).

In view of the findings from the ENQA report and the commitment to continuous improvement of the Agency's operation, we immediately adopted appropriate measures and procedures for their implementation.

**The Agency has already adopted and reviewed the following:**

- **Action plan, to which it added the tasks in accordance with recommendations of the ENQA evaluation team**, deadlines and persons responsible for their implementation,
- **Rules of procedure on accreditations**,
- **New website: [www.nakvis.si](http://www.nakvis.si) that contains also all decisions and experts reports (with the positive and negative outcomes) that is fully accessible for blind, partially sighted and people with visual impairments**,
- **Methodology and procedure for the preparation and dissemination of systemic and thematic analyses** that determined the objectives, methods of cooperation with external stakeholders and procedures of preparation and adoption of systemic and thematic analyses prepared by the Agency: Action Plan 2018, activity number 2.1,
- **Human resource development plan** that will contribute to the professional development of employees and their motivation for the Agency work: Action Plan 2018, activity number 3.32,
- **Communication plan** to strengthen the two-way communication with internal and external stakeholders, improve the involvement of HEI's in the process of amending the Agency's acts and increase the common understanding and expectations among different stakeholders in the field of quality assurance in higher education: Action Plan 2018, activity number 2.41 and 2.42,
- **Documents published online, including the supplemented FAQ's**, which will provide information to interested parties and increase the transparency and clarity of documents and procedures at the Agency's website,
- **Presentation of the absorption of funds** demonstrating financial sustainability and long-term stability for the smooth operation and planned development of the Agency in the future.

As seen from our activities and progress made in the last self-evaluation period and especially in the past months, we have taken all the ENQA review panel recommendations and findings very seriously and immediately started to implement the appropriate measures for improvement. We updated the SQAA Action Plan for 2018/19 and focuses on all the findings of the ENQA Review Panel. With the help of external communication experts, a thorough communication plan was prepared together with an implementation plan and we have immediately acceded to its implementation. New Agency's website is up to date, user-friendly and is fully accessible for users with disabilities and much more has been achieved.



n·a·k·v·i·s

Nacionalna agencija Republike Slovenije  
za kakovost v visokem šolstvu

s·q·a·a

Slovenian Quality Assurance Agency  
for Higher Education

But we are also aware, that there are still challenges in front of us and possibilities for improvement that we plan to address and realize in 2019 in order to help to strengthen the quality culture in Slovenian higher education area and abroad. Following that vision, our aspects are very closely connected with collaboration in international associations of QA Agencies and in EQAR.

We kindly ask the EQAR Register Committee to examine our response and to take it into account when deciding on the extension of the SQAA's entry in the Register.

We would like to thank you in advance for your cooperation.

Yours sincerely,

Ljubljana, 11. 1. 2019

Dr. Franci Demšar

SQAA director



Brussels, 15 March 2019

## Application by SQAA for renewal of registration on EQAR

Dear Jean-Marc,

The Slovenian Quality Assurance Agency for Higher Education (SQAA) has made an application for renewal of registration/initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of October 2018 on which SQAA's application is based. The EQAR Register Committee's rapporteurs have been considering the application and the external review report.

We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of SQAA's application:

1. In relation to ESG 2.5 (Criteria for Outcomes), your report notes that the "panel heard that the criteria for assessment are not always clear and leave room for interpretation" and "share[d] the concern expressed by HEIs and experts about the consistency of the outcomes" (p. 34).

Could you please elaborate on the panel's reasons for concluding that SQAA substantially complies with the standard despite the expressed reservations?

2. In relation to ESG 3.3 (Independence), the report notes that the "council mentioned that the Ministry might have interfered with the agency's work" and, in the analysis, states that "the private HEIs mentioned some cases of inconsistency and partiality" (p. 17).

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EQAR Founding Members:

Could you please clarify whether the panel found that these concerns were substantiated and how did that influenced the conclusion?

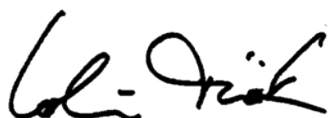
In relation to the concerns raised by private HEIs, did the panel inquire whether these concerns were also brought forward in appeals against the respective decisions?

We would be grateful if it was possible for you to respond **by 27 March 2019**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on SQAA's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: Michèle Wera (secretary)  
ENQA (coordinator)  
SQAA

## **Answers to the two questions raised on March 15, 2019 by the EQAR Committee's rapporteurs about the Final SQAA Review Report of September 14, 2018**

Preliminary remark: the Review Panel would have appreciated to receive the clarification questions much earlier than six month after the delivery of its Final Report.

### **Ad Question 1**

ESG 2.5 states that « Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision. »

As noted in the Report (p. 33), there was evidence that « all external assessments are based on criteria publicly available on the agency's website » and that « stakeholders are acquainted with the criteria and procedures. ». Thus, the requirements of explicit and published criteria are fully complied with. On the other hand, having heard that « some » criteria – not all – are « not always » clear (p. 33) and that « some regulations could be more specific in order to make procedures more consistent and transparent » (id), the panel recommended specific measures to improve the situation. Compared to these nuanced findings, the language of the analysis that follows was perhaps slightly too strong, but the panel wanted to make sure that a renewal of the 2015 recommendation would this time be implemented. On the whole, and keeping in mind that a 100% consistency of human judgements is not achievable, it seemed to the panel that an assessment of substantial compliance of ESG 2.5 was globally fair.

### **Ad question 2**

The substantiated « interferences » of the government were two cases reported by HEIs during their hearing about positive accreditations (one institutional, one of a programme) decided by the agency that were, however, not included in the register by the government. Since the register is now in the hands of SQAA, this is past history. We do not remember other recent and precise incidents. As for the concerns raised by private HEIs, they were not substantiated and, to our knowledge, were not brought forward in appeals. The Final Report analyses quite at length the three aspects of independence and explained that, as of August 2018, considerable progress had been made since the last review.

March 15, 2019.

Jean-Marc Rapp