

SQAA FOLLOW-UP REPORT

By the decision of ENQA on 13 December 2018, the ENQA membership of the Slovenian Quality Assurance for Higher Education (hereinafter: SQAA) was extended for another five years. The recommendations of the ENQA panel have been considered with the utmost care. Provided below are the evidence and explanations presented by each individual ESG standard.

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE (substantially compliant)

Recommendation:

The panel recommends SQAA explores ways to ensure the full commitment of all stakeholders to the external quality assurance process.

- A new **Communication Plan** was drawn up in August 2018 in order to strengthen the two-way communication with internal and external stakeholders, improve the involvement of higher education institutions (hereinafter: HEIs) in the process of amending SQAA regulations and increase the common understanding and expectations among different stakeholders in the field of quality assurance in higher education.

- Many steps have been taken to ensure better cooperation with the most important stakeholders. Since 2018 SQAA holds **regular meetings** with regards to procedures, the information system, legislation and other important issues with the Ministry of Education, Science and Sport, the Slovenian Student Union (hereinafter: SSU), Employment service of Slovenia, Rectors Conference, University of Ljubljana and other HEIs.

- SQAA (along with the Slovenian Academy of Sciences and Arts) organized the **Conference on Quality in Higher Education: From minimum standards to excellence** in May 2019 which was attended by many key stakeholders in higher education. Such events promote important higher education topics and improve the awareness of the public on these matters. The following year's conference called **Shaping the Universities of the Future** was organized in November 2020 via teleconference. It dealt with the current topic of forming transnational alliances of European universities, which is also a very important topic with regards to quality assurance. SQAA also organized a **videoconference meeting celebrating the 10th anniversary of SQAA** in June of 2020, which was attended by various invitees – representatives of former and current bodies and institutions.

- The conference in October 2021 also took place in an online form. This time the focus was on **QA in online mode of operation**. We discussed and exchanged experiences of different stakeholders and focused on the future system of evaluations and accreditations as well.

We regularly **communicate the agreed proposals of changes to any regulation with the public**. All consolidated proposals of regulatory changes are made public twice – after external stakeholders express proposals to amendments, these are discussed by the SQAA Council and the new consolidated version is again published and open to further proposals before the amendments are finally adopted.

- Since September 2019 the Director has been holding regular weekly visits to all **HEIs in Slovenia** with the goal of deepening cooperation between the agency and the HEIs.

- He and his co-workers have also been visiting fellow **foreign agencies for quality assurance in higher education** (Agency for Science and Higher Education (AZVO, Croatia), National Entity for Accreditation and Quality Assurance in Higher Education (NEAQA, Serbia) with the aim of strengthening existing ties and reflecting on new forms of project and international cooperation while ensuring the internationalization of SQAA. This cooperation was formalized with **the recent signing of two cooperation agreements**. SQAA is continuing this activity even in pandemic times. In 2020 director with his co-workers¹

visited the Agency for the Control and Quality Assurance of Higher Education (AKKVO, Montenegro) where they signed a cooperation agreement. Also a meeting with the National Agency for Higher Education Quality Assurance (Ukraine) was held in November 2020 in Ljubljana.

- In the context of international cooperation, it is also worth mentioning that the director of SQAA dr. Franci Demšar became the new president of CEENQA in July of 2020. We consider this an important step to further improve our international cooperation and reputation.

- In 2021 SQAA continued its work within the CEENQA organization, especially by working closely together in preparing the first CEENQA document, Guidelines for distance evaluation, and by participating in the annual staff exchange with the Romanian agency ARACIS. Thus, SQAA ensures its inclusion in EHEA and the regular exchange of good practices. In order to deepen international cooperation and communication, the Agency actively participated in different international working groups, such as ECA, INQAAHE and BFUG. In December 2021, the Agency hosted representatives from the Federal Agency for Quality Assurance of Bosnia and Herzegovina (*Agency for the Development of Higher Education and Quality Assurance of Bosnia and Herzegovina, HEA*) and outlined opportunities for further cooperation either through various thematic meetings, projects or experts' exchanges

- The SQAA's **website** was redesigned in December 2018, making it more informative, transparent and above all more accessible to all groups of users, especially to the blind and visually impaired, as well as to people with reading disabilities.

- The new information system **eNakvis** (available from June 2018) that allows SQAA and HEIs to carry out all procedures electronically has successfully been implemented.

- SQAA set up **new YouTube channel** containing video tutorials for different types of eNakvis users. The YouTube channel also contains **promotional videos of all HEIs** with the aim of providing relevant and diverse information of the Slovenian higher education area to students and other stakeholders. SQAA resumed the activity of preparing the promotional videos of remaining HEIs in October 2020 and in November 2021. All videos are focused on future students, directing them to the SQAA website for useful information on HEIs and enrolment. The SQAA website is aiming to become a common information portal for all students and future students, offering accurate, up to date and relevant information about studying in Slovenia, its quality and achievements.

- Starting in January 2019, SQAA began issuing a **monthly newsletter** to actively inform all its stakeholders of the most important matters related to its activities and operations.

- A **Twitter profile** has also been set up, thus offering an additional communication channel for SQAA news and other relevant information. SQAA is also in the process of creating a Facebook profile to further strengthen our cooperation with our most important stakeholders – especially students.

Other findings of the ENQA experts:

- The student council of independent HEIs is not represented in the agency's council nor in the peer reviews.

- According to the legislation, **SQAA is not authorized to appoint** Council members; instead, two student members are appointed by the SSU in cooperation with student councils. Therefore, SQAA cannot influence the composition of the Agency Council. Nevertheless, SQAA has **informed SSU** about the findings of the ENQA panel and suggested that greater attention should be paid in the future to the resolution of this issue.

- With regards to the composition of students involved in the peer reviews – through the amendment of the criteria, SQAA has taken the **full control of the training of student experts** (shared with the SSU in the past). Without the former preselection, all candidates for training can apply. Within SQAA's competence also lie the selection and the training of the student experts. This increases the possibilities for more balanced composition of student experts regardless of the HEIs they are from. As of December 2019, 3 out of 14 (21%) student experts in the registry come from independent HEIs which exceeds the₂

relative number of the students enrolled in the independent HEIs in Slovenian higher education (approx. 10%) and are equally involved in accreditation and evaluation procedures as other student experts in the registry. As of November 2020, 2 out of 18 (11%) student experts in the registry come from independent HEIs. We would also like to mention that a new Student Constitution was adopted by the SSU in February of 2019. One of the most important changes is that the student unions of independent HEIs were acknowledged as equal partners in the SSU and will be financed from concession payment, meaning from the state budget. As of December 2021, only 1 out of 19 student experts in the register comes from independent HEIs and one is in the process of signing into the SQAA expert pool. SQAA has launched several activities to ensure the greater engagement of students in SQAA procedures, including the presentation of SQAA's work in meetings with representatives of student and secondary school organizations, the preparation of promotional brochures and an active website with promotional videos and other interesting information.

- The panel would have expected the council to be more open to a constructive dialogue with the government and HEIs. The council's unconditional commitment would certainly contribute to the further development of high-quality culture in Slovenia. The panel finds that the council, as the highest decision-making body, needs to set an example and strive to involve all stakeholders in SQAA's governance and work. A good start for the council would be meeting with all relevant stakeholders, individually or in a mixed composition, on a more regular basis.

- SQAA has been working on engaging the Council members more actively in communicating with external stakeholders. The **Council members** participated and attended the conference 'From minimum standards to excellence' in May 2019, they have also been actively involved in the SQAA expert trainings and other conferences. In accordance with the adopted communication plan, Council members accompanied the Director on the above-mentioned regular weekly visits to HEIs (September 2019). A Council member is also a member of the SQAA self-evaluation committee. The regular visits of HEIs were carried out until March 2020 (council members also accompanied the Director on these visits) until they were interrupted because of the COVID-19 epidemic. The training session for the senior and the new Council members focused on the interpretation of the Criteria for the accreditation and external evaluation of higher education institutions and study programs and the Criteria for international cooperation was held in March 2020. Additional training for council members focused on the prevention of corruption was carried out in February 2020. The Agency is highly committed to ensuring independence and preventing conflicts of interest. The Rules of Procedure of the Agency Council were updated in March 2020 with specifically that in mind.

In 2021, individual members of the Agency's Council continued to be actively involved in various events and working bodies. Thus, the President of the Council actively participated, as a member of the expert group for the preparation of starting points for the new national higher education programme. He has also recently become a member of an expert group working on guidelines for improving inclusion within the Commission for Equal Opportunities.

ESG 3.3 INDEPENDENCE (substantially compliant)

Recommendation:

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

Let us emphasize that all the important stakeholders strongly support the operation of the Agency. Their support was evident in the united defence of SQAA in all important legislative changes. We will further improve our standing and cooperation with our stakeholders through improved communication. We are confident that the independence of the Agency is not at risk. SQAA enjoys the public status as a non-governmental direct budget user, similar to the other independent public institutions, such as the Constitutional Court, Court of Auditors, Bank of Slovenia, Academy for Sciences and Arts, to name a few.

An important issue to highlight is that the Agency, *de facto* and *de jure*, continuously ensures that there are no predominant third-party influences on its work, especially when appointing the chief executive, preparing quality assurance standards, appointing experts, deciding on the evaluation and accreditation procedures as well as safeguarding appeal procedures. In this context, the Agency continued with the analysis of the independence of quality assurance agencies. The context of its analytical work on independence and its findings are grounded in the idea of identifying common problems, exchanging examples of good practices and proposing relevant solutions. The study on independence is related to exploring the role of agencies from different backgrounds, analysing differences and commonalities among different parts of Europe, and evaluating the responsibilities of key actors at the agency level. So far, the Agency has analysed 26 quality assurance agencies, of which 14 are ENQA members.

Despite all the above, we are trying to ensure an even more stable legislative environment. Currently, the fundamental concepts and coordinates of the higher education system, the principles and measures of the accreditation and evaluation processes are outlined in the Higher Education Act and the general procedure rules are outlined in the General Administrative Act, both adopted by Parliament, whereas the detailed procedural steps and above all the quality standards are outlined in the Criteria for the Accreditation and External Evaluation of Higher Education Institutions and Study Programmes and other Criteria, all adopted by the Council. Especially during the appeal procedures, it has become evident that the quality standards may interfere with the provisions of the higher law and thus, their effects lessened or even ignored.

Therefore, the Agency has drafted an **autonomous act on the Agency** to avoid the abovementioned challenges as well as to have an act suited to the needs of quality assurance in higher education and an act that will not be affected by the adoption of other legislation. The draft has already been prepared in 2019. The draft of the act was sent to the Ministry of Education, Science and Sport in November 2020.

In April 2021 the draft of the act was again sent to the ministry and in October 2021 the ministry nominated a working group of different stakeholders to prepare the act that would be submitted in the legislative procedure in Parliament. The working group met in two meetings and they discussed the draft and agreed that the state secretariat harmonizes some of the proposed solutions of the draft of act with the Ministry of Public Administration.

Advice for future improvement:

Inclusion of more international experts in the Agency's work, which will strengthen public awareness of the independent operation of the Agency.

Foreign experts are included in all expert groups by law. They also actively participate at the conferences and other events organized by SQAA (see examples above). We've also made a special effort to include more diverse international experts in our future reviews by **amending the Criteria for accreditation** in March 2019 and making necessary for the application to be translated into English, meaning that foreign experts are able to obtain all the necessary documents to perform their tasks efficiently. When conducting a PhD study programme accreditation and a university re-accreditation, it is mandatory that at least two foreign experts of different origins are included in the expert group. The inclusion of

foreign experts is also strengthened with our international events, where the presentations and discussions are held in English.

In 2021 the Agency also included a foreign student from the ESU register in the external evaluation procedure, which turned out to be a very good experience. For this reason, the Agency concluded a Memorandum of Understanding with the ESU in December 2021. In same external evaluation procedures, the Agency also included foreign experts as part of the CEEQA mobility project.

ESG 3.4 THEMATIC ANALYSES (partially compliant)

Recommendation:

The panel recommends that SQAA develops a method for the production and dissemination of thematic analyses on issues that are relevant to its stakeholders.

The document **Methodology and procedure for the production and dissemination of thematic analyses** was prepared in August of 2018 and it precisely defines 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 above-mentioned document also clearly defines the target group of these analyses, although this can also 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. The document was further updated in September 2020. An additional thematic analysis has been prepared on the subject of human resources, i.e. pedagogical and research work and working conditions of higher education teachers and researchers in October 2018. The Agency has also established the Department for Analyses, International Cooperation and Information Technology, where one of its main tasks is the preparation of thematic analyses. In 2019, further analyses were made: an analysis of reporting in evaluation procedures, an analysis of employability of students according to all programmes and HEIs and an analysis of the independence of quality assurance agencies. The latest thematic analysis was presented in more detail to the Council members, and Agency experts at expert training seminars and to all interested stakeholders at our Conference on Quality in Higher Education in May 2019. To further improve the work in this area, SQAA established a separate Department of Analytics in December 2019. Currently, the thematic analysis of Slovenian transnational higher education is being drafted based on evaluation reports of study programmes provided abroad. In 2022, an extensive periodic system-wide analysis is planned. For the purpose of improving the analytical work of the Agency, four employees have been enrolled in a PHD study programme, mostly financed by the Agency.

ESG 3.5 RESOURCES (substantially compliant)

Recommendation:

The panel recommends that SQAA ensures the necessary funding for the implementation of its strategy plan and subsequent action plans including a staff development plan.

The allocated funds are more than sufficient for the proper functioning of the Agency. In the upcoming years, SQAA does not expect financial barriers for the implementation of the plans of the new management. On 1 September 2018, the Agency employed a new staff member (IT specialist) without any additional funds. Having received the draft report of the ENQA panel, the **human resource development plan** was prepared in August of 2018. 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. As₅

already mentioned, the Agency also established a new organizational unit – the **Department for Analyses, International Cooperation and Information Technology**. As of November 2020, the allocated funds, which are at the moment assured until the end of 2021 (two-year budget cycle), are still more than sufficient to cover all operational costs of the agency. The funds at our disposal are successfully and rationally allocated to ensure all the necessary activities and meet our strategic targets. In the year 2019 the agency was reorganized, four departments were formed, each department has its head and a deputy, most of the employees have been promoted to posts of a superior type. The agency is purposely managing the education and professional training of its staff. The director adopts an education plan every year; part of the budget is reserved for that purpose. In 2019 three employees were studying to achieve a higher level of education. In 2021 five employees were enrolled in a study programme to achieve a higher level of education, mostly financed by the Agency. In December 2021, an employee satisfaction survey was conducted. Its results will be presented in the next self-evaluation report.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT (partially compliant)

Recommendation:

SQAA is advised 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 advised 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.

All self-evaluation reports (hereinafter: SER) have been considered and coordinated several times at employee meetings and at the Agency Council meetings. The Agency Council adopts each SER report at a regular meeting and makes each adopted self-assessment report public. Introduced for the 2014 and 2015 SERs was the practice that the Agency prepared the so-called "third-party call" where the relevant SER was publicly displayed (for a month) – published on the website, and stakeholders could comment on its contents. The self-assessment report for 2016 and 2017 was also submitted to two external experts. The Agency will continue to include foreign experts and stakeholders in the preparation of the SER, and apply the third-party call mechanism. An additional step has also been taken in ensuring total transparency and improving communication with external stakeholders when preparing the 2019 SER by forming an **external workgroup** that cooperates with the internal SER group in preparing the report and providing an unbiased external viewpoint. The external workgroup is composed of a member of the Rector's Conference, the Community of Independent HEIs, the Community of HVCs and SSU. The members of the workgroup are invited to participate in the SER group meetings and are actively involved in preparing the SER. A Council member is also a member of the self-evaluation committee.

More broadly, we emphasise that it is the Council that considers and adopts the Agency SER (which is also evident from the minutes of the Agency Council meetings). The Agency has been striving to improve the communication among stakeholders even further, which is evident from all SERs and other activities already mentioned in this report. Although communication has already considerably strengthened in the last self-evaluation period, we are aware of the opportunities for improvement. Therefore, we agree with the recommendation of the ENQA panel that one of the key opportunities for improvement is the strengthening of communication with all stakeholders of the Agency. The Agency immediately took action to improve the situation as evident in point 3.1.

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES (fully compliant)

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE (fully compliant)

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE (substantially compliant)

Recommendation:

SQAA is advised 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 the further development of a quality culture within Slovenian higher education.

The Agency cooperates with all stakeholders in the process of **coordination** of all the Agency's acts. The coordination takes place electronically (by email) and in the case of a greater regulation reform also in the form of workshops and coordination meetings. In special cases, stakeholders are also invited to the Council meetings. Every new act is also published on our website for further comments and additions for at least a week before the Council discusses it. The new **communication plan** also addresses all possible communication disruptions and ensures that no stakeholders feel left out.

The new Criteria takes better account of the specificities of individual institutions, their size, resources and areas of operation, and clearly distinguishes between different types and cycles of study programmes, regarding the diversification of their activities, professional and scientific and research work, practical training of students, human resources and equipment. It is even more clear from the electronic application form which standards or criteria have to be fulfilled. Recently (March 2019), the **Criteria for Accreditation** have been further supplemented, with greater focus on the doctoral study level, thus increasing the flexibility in procedures even more. Using an enhanced communication strategy, we regularly monitor the applicability of the criteria and adapt them when necessary in agreement with stakeholders.

To facilitate understanding, we supplemented the [FAQs](#) and are planning to prepare, after the comprehensive practical integration of the criteria, the **Guide to Accreditation and Evaluation Procedures**. This guide will also take into account the ENQA panel recommendations. The guide will replace the [Manual for Agency Experts](#). Let us emphasise that until now, the HEIs have not yet communicated any difficulties in understanding the contents of the new criteria and completing the applications, while there was a great deal of misunderstanding with regard to the old criteria. We firmly believe 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 preparing 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 further simplify administrative procedures and increase the focus on the contents of decision-making. On the SQAA website there is [publicly available information about all processed applications with the exact phase of procedure](#). As of November 2020, the Guide to Accreditation and Evaluation Procedures is in the final phase of preparation. Its findings were communicated to the SQAA professional staff and were presented to the experts and HEI teachers as part of the conferences in December 2020. The guide will be regularly updated with further practical field experiences. In 2021, this document has been vastly expanded and is being further discussed with stakeholders. It will be published in 2022 in several formats and versions for easier use.

The current pandemic has affected the operation of the Slovenian Quality Assurance Agency (SQAA) and its accreditation and evaluation procedures in a significant way. Due to the pandemic outbreak, all site visits of expert groups at higher education institutions and vocational colleges planned for March through May were cancelled. In order to resume its work, the SQAA prepared the Guidelines for distance evaluations. As of June 2020 SQAA has successfully implemented distance evaluation in its work and all the procedures are conducted as intended – in terms of timing and substance.

SQAA has also prepared the Recommendations for HEIs during emergencies. The aim of said document is to present the HEIs with a collection of key guidelines and recommendations for handling the present conditions, in order to maintain the quality, integrity and purpose of higher education.

SQAA has also amended the minimum standards for election to titles under COVID conditions. Habilitation criteria now take into account the limitations of researching and teaching abroad which however still remains a condition to become a professor.

ESG 2.3 IMPLEMENTING PROCESSES (substantially compliant)

Recommendation:

SQAA is advised 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 advised to develop a shared understanding of criteria and publish the official interpretation of the criteria and regulations.

The changes to the quality system due to the amendment to ZViS led the Agency to change its own criteria and introduce a new type of follow-up procedure. The Agency therefore successfully integrated a **follow-up** in its procedures. Starting in 2019, the evaluation of a sample of study programmes took on the task of continuously monitoring improvements: the purpose of this type of evaluations is the review and assessment of follow-up measures and counselling to institutions. According to the new criteria and the amended procedures, each HEI has to submit a follow-up report responding to the outcomes of the sample evaluation. According to the new Criteria for Accreditation, the HEIs have to submit a **progress report** to the Agency Council within two years of the accreditation or evaluation in each procedure with regards to both higher education institutions and study programmes. Besides reviewing the progress reports, the Agency continuously monitors the improvement of quality at the institutional level **by collecting and analysing their self-evaluation reports**. These reports are also analysed and made public in periodic system-wide and specific thematic analyses, which are also presented to interested stakeholders at different SQAA events. All the Agency's criteria relevant for accreditation and evaluation procedures are also explained and interpreted both in the application forms and in templates for reporting. In this manner, the stakeholders on both sides of procedures, those who evaluate and those who are evaluated, have access to instructions on how to understand and apply quality standards in quality assurance and enhancement procedures.

ESG 2.4 PEER-REVIEW EXPERTS (substantially compliant)

Recommendation:

SQAA is advised to reconsider 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 is aware of the problem of comprehensive field coverage by Agency experts, so we annually invite (by a public call) different experts from deficit study fields/areas to

cooperate. Therefore, **30 new experts from shortage fields just in the year 2019 have been enlisted**. Despite the problems connected with the epidemic, 15 new experts have been enlisted in the year 2020, and 10 in the year 2021. The problem of diversity is also solved by including foreign experts from relevant fields. We have also organized special trainings for chairs of groups in sample evaluations (March 2019). As previously mentioned, a special effort has been made to include only the most respectable and qualified foreign experts in the future reviews by **amending the Criteria for Accreditation** in March of 2019 and making it a necessity for the application to be translated in English, meaning the foreign experts receive all the necessary documents to perform their tasks efficiently. With regards to the number of students involved in peer reviews – one of the reasons for the **amendment to the Criteria for Agency Experts** was so that the Agency takes full control of the training of the student experts (the control was shared with SSU in the past). The amendment therefore facilitates the accessibility to student candidates of all HEI's, while the selection of candidates for training is within the competence of the Agency, which would in turn also ensures that the composition of student experts is more balanced.

ESG 2.5 CRITERIA FOR OUTCOMES (substantially compliant)

Recommendations:

SQAA is advised to encourage institutions to include consistent follow-up procedures in their internal quality assurance system. In addition, SQAA is advised 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).

To increase transparency, the Agency Council updated (end of April 2018) The **Rules of Procedure**, which clearly show how to consider the documentation, how to carry out decision-making, the cooperation with expert services of the Agency and the adoption of decisions. The Agency has adopted an amendment to the Rules of Procedure in March 2020, which clearly sets out the conduct of the Council in the case of a disagreement with the findings of the group of experts. The procedure in accreditation and evaluation procedures is clearly defined in the HEA (Higher Education Act), supplemented by the GAPA (General Administrative Procedure Act). For more transparent conduct, the staff and council members have the Rules of Procedure at hand that define the entire outline of the procedure.

In 2021 SQAA prepared 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 into the understanding of the criteria and procedures of the operation of the Agency. The document has been supplemented and is still in the process of being published in written form.

ESG 2.6 REPORTING (partially compliant)

Recommendation:

SQAA is advised to publish all reports including those with a negative outcome in the case of initial accreditation procedures for reasons of transparency and further development.

As of 2019, **all the negative decisions made by the Agency Council are made public and published on our website**. The contents of the conclusions of the Appeal Committee are always, without exceptions, summarised in the Agency Council decision because the decision must summarise the course of procedure and findings. The decisions of the Appeal Committee are not published separately because they constitute only one of the stages in accreditation and evaluation procedures.

ESG 2.7 Complaints and appeals (substantially compliant)

Recommendation:

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

The appeal procedure against decisions of the Agency Council is properly regulated by two laws – the GAPA (General Administrative Procedure Act) and the HEA (Higher Education Act). In accordance with the provisions of the GAPA, an appellant can file an appeal on the basis of a violation of the rules of procedure, incorrect application of a substantive regulation and also incorrect or incomplete factual findings. Since the HEA does not provide a different regulation of grounds for appeal, the provisions of the GAPA, which envisages all three of the above grounds for appeal, are observed. An appeal may also be lodged owing to administrative silence of the first-instance authority.

Applicants also have other options in procedure by which they can express their disagreement – lodge a 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.

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. 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. There is a lot of case law of the use of the GAPA which is publicly accessible.

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