

Note



The Danish
Accreditation Institution

Receiver(s) > ENQA Board

Follow-up report in relation to ENQA Agency Review in 2021

Between February 2020 and May 2021 ENQA conducted an external review of the Danish Accreditation Institution (AI). In June 2021, ENQA published the review report measuring AI's level of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

On the basis of this review report, ENQA's Board concluded that AI is in overall compliance with the ESGs.

In the review report, the expert panel concluded that AI is:

- Fully compliant with ESG 3.2, 3.4, 3.5, 3.7 and 2.4
- Substantially compliant with ESG 3.1, 3.3, 3.6, 2.1, 2.2, 2.3, 2.5, 2.6 and 2.7

As for the ESGs, that AI was considered substantially compliant with, the expert panel provided recommendations for further improvement. In the following, we present the expert panel's recommendations and the initiatives taken by AI in order to meet the recommendations. We also describe initiatives taken by AI regarding ESG 3.4 where AI is fully compliant. We do so in response to the Board letter from June 29 2021 in which AI is asked to pay further attention to ESG 3.4.

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ESG 3.1 – panel recommendations

“The panel recommends the agency to address the peculiarities of the dual accreditation system, namely by reflecting on how to consolidate the interdependence of the relationship between AI and the AC.

The panel also recommends the agency to consider the establishment of an advisory body or similar that could institutionalize and strengthen the dialogue with the relevant stakeholders, namely with the MHES, the AC and with HEIs.”

Initiatives by AI

Initiative concerning stakeholder involvement:

1. *Ongoing focus on dialogue with stakeholders.* AI's commitment to involve stakeholders is reflected in AI's core values (revised in 2022), as one of them is, “AI seeks dialogue”. In the years to come, AI prefers to institutionalize this dialogue with stakeholders through the Accreditation Council in order to avoid the system growing more complex by establishing a new advisory body.

Furthermore, AI will continue its numerous ongoing activities, which involve stakeholders, cf. also AI's SAR from October 2020, including:

- The recurring dialogue with HEIs via different kind of meetings.
- The recurring dialogue with different national student organizations through the Students' Accreditation Council (STAR), which serves as a knowledge sharing and discussion platform.
- The recurring dialogue with those interested in Learning Analytics through the Learning Analytics Network.
- Stakeholder involvement in relation to significant initiatives or specific occasions. Since the ENQA review in 2021, recent examples of such initiatives and occasions includes:
 - AI has implemented procedures for the evaluation of the second round of institutional accreditation (IA 2.0), which involves HEIs and accreditation panels (see initiative 4).
 - AI and the university college VIA have hosted a conference on micro-credentials (October 2021)
 - AI and the association Universities Denmark have hosted a seminar on research-based education for representatives of the Danish universities (September 2021)
 - AI has hosted a seminar on student evaluations for representatives of student organizations (February 2023).
 - AI has hosted a seminar on education quality at decentralized study programmes (March 2023)

As a major future initiative, AI will initiate a formal dialogue with HEIs and other stakeholders in 2023 and 2024 concerning the design of



the third round of institutional accreditation, which is set to begin in 2026. Furthermore, AI plans to initiate a dialogue with stakeholders in 2024 in order to develop its strategy for thematic analysis.

Initiatives concerning the dual accreditation system:

2. *Focus on ensuring that new members of the Accreditation Council understand their role and functions.* AI continuously reflects on the relation between AI and the Council and the necessary coordination and congruence between the two bodies. Therefore, when new members are appointed to the Accreditation Council, AI introduces the legal framework for the accreditation system in order to highlight the role of the Council and the division of labour between AI and the Council. Furthermore, AI gradually introduces the Council to different parts of the accreditation methodology to ensure that the Council understands AI's work. During these introductions or when the Council makes its decisions based on accreditation reports, AI is open to discuss the methods and processes used by AI with the Council and implement changes when relevant; however, there is a mutual understanding between the Council and AI that the design of the accreditation methodology is AI's responsibility.
3. *Increased awareness on the division of labour between AI and the Accreditation Council in the communication to stakeholders.* The independent communication of the Council to the stakeholders has been adjusted:
 - Following the visit of the ENQA panel in January 2021, the Council secretariat realized that the decision letters from the Council to HEIs should no longer be signed by both the chairman of the Council and the executive director of AI. In order to emphasize the role of the Council as decision-making body, all decision letters are now only signed by the chairman of the Council.
 - When writing the newsletters of the Council, the Council secretariat is now focusing on emphasizing even more than before the role and functions of the Council.
 - The executive director of AI decided to transfer the responsibility for the communication of the Council from the communication unit in AI to the Council secretariat in 2022. The purpose of this change was to ensure even greater clarity in the communication about the role and functions of the Council, cf. the above.
 - The Council secretariat expects to go through the rules of procedure of the Council in order to identify possible needs for clarification concerning the communication of the Council or other things.

ESG 3.3 – panel recommendations

“The agency should reflect about the understanding of independence between AI and the AC and how to balance between their statutory independence and the necessary coordination and congruence between these two bodies.”



Initiatives by AI

See initiatives 2 and 3 (ESG 3.1)

ESG 3.4 – panel recommendations

The expert panel considers AI fully compliant with ESG 3.4. However, the panel believes that the recommendations of the previous ENQA review (2016) are still relevant:

“The panel recommends AI to clarify the purpose of their analysis, especially in relation to the analysis of EVA and to communicate this to stakeholders. The panel recommends AI to also consider setting up formal feedback mechanisms on the relevance and usefulness of their analysis”.

Initiatives by AI

4. *Revision of current analytical strategy.* AI’s analytical strategy (formulated in 2020) provides the overall framework for the work on thematic analyses. AI plans to revise the current strategy in 2024 in close dialogue with key stakeholders, including HEIs and EVA. As part of the dialogue AI plans to discuss if and how to develop current procedures for planning the analyses and getting feedback.

ESG 3.6 – panel recommendations

“The agency should consolidate its processes of internal reflection and devote more attention to self-reflection, namely by using in a more systematic way the contributions of internal and external stakeholders”.

Initiatives by AI

5. *Strengthening AI's concept of evaluation with external stakeholders.* Since the last ENQA review in 2021, AI has implemented a new concept for the evaluation of IA 2.0 with the purpose of assessing how AI is meeting the key objectives set for IA 2.0. The concept has been developed in close cooperation with HEIs. It consists of a comprehensive methodological design according to which each IA 2.0 process is followed by:
 - A survey and a follow-up meeting with the HEI
 - A survey with the members of the accreditation panel
 - Dialogue with the relevant team of consultants
 - An inventory of the volume of documentation and the number of interviewees.

AI has nominated a dedicated evaluation group responsible for collecting and analyzing the feedback from HEIs, accreditation panels and teams of consultants. While it was previously the team of consultants, who were responsible for carrying out the evaluation, this is now done by this dedicated evaluation group.



Once a year AI's evaluation group summarize and convey findings from the completed evaluations in an external report to the council and an internal report described in initiative 6 below.

6. *Increased focus on the systematic use of contributions by HEIs and accreditation panels.* An important part of the new evaluation concept is the reporting of results to internal stakeholders, and the subsequent (self) reflection, which enables a continuous adaption of the accreditation process. Therefore, AI's evaluation group prepares an internal report, which summarizes the results from the evaluations with HEIs and accreditation panels.

The report is discussed first among AI's management and second, among consultants at a KSU department meeting for accreditation consultants. At this meeting, the evaluation group facilitates a workshop where consultants discuss and prioritize areas of development. On this basis, an internal follow-up plan is prepared, outlining which actions should take place, why and who is responsible. The responsibility for the follow-up lies with the two Directors of Operations from KSU (the department in AI responsible for conducting accreditations).

Since the first internal report in April 2022, smaller groups of consultants have worked with the identified areas of development. As an example, one area of development was how to strengthen the role of students in accreditation panels. A working group consisting of two consultants prepared and facilitated a workshop at a department meeting. The results were put together in an inspiration catalogue, containing different tools for strengthening the role of students in accreditation panels. In the latest internal report, from March 2023, the evaluation group has identified areas of development, which will be addressed in the current year.

Throughout the remaining IA 2.0 cycle, AI plans to prepare internal reports, summarizing the results from the evaluations.

7. *Strengthening internal feedback processes by improving consultants' feedback skills.* AI has refined its internal feedback structures in relation to accreditation processes (see initiative 15). In that context, AI consultants have to complete a feedback course, which aims to improve consultants' feedback skills. The course is tailored to AI's organization and tasks in order to optimize the learning outcome. The course is a part of AI's compulsory, internal training programme, which was implemented in 2021.
8. *Knowledge sharing in a hybrid workplace.* With the relocation to Holbæk, AI has an increased focus on how to sustain the level of knowledge sharing in a hybrid workplace. Among other things, AI has agreed on a new "working hour agreement," outlining on which days AI's staff has to be in-office and when remote work is allowed. As a result, AI staff meets physically 2-3 days pr. week, where knowledge sharing, discussion and reflection is on the agenda. An important element is weekly team meetings



among accreditation consultants, involved in the same accreditation process. The bi-weekly KSU department meetings is another key forum where teams, involved in different accreditation processes, share experiences and discuss different challenges and ideas.

Being a hybrid workplace, onboarding of new employees is crucial. Therefore, AI has implemented a new onboarding programme in November 2022. This programme aims to ensure, that all new employees will get the right knowledge and be trained in relevant skills. It also help them to form social relations and get to know the culture in AI.

ESG 2.1 – panel recommendations

“The agency should consider its approach condensing to 3 standards, and evaluate on whether these 3 standards are effective and comprehensive in addressing the whole of Part 1 of ESG”

Initiatives by AI

9. *Thorough assessment of the framework for IA 2.0 ahead of dialogue with stakeholders.* With the third round of institutional accreditations (IA) set to begin in 2026, AI will be initiating formal dialogue with HEIs and other stakeholders in 2023 and 2024. The aim of the dialogue is to discuss how the IA-framework can develop, while maintaining an effective, comprehensive and transparent accreditation process.

In preparation for the dialogue, and with the aim of addressing the panel recommendations, AI will assess the following (related) questions:

- How has the current framework (IA 2.0) supported a thorough assessment of all aspects of ESG part 1?
- Has the IA 2.0-guidelines provided sufficient transparency in terms of the requirements for internal quality assurance? To what extent have the guidelines succeeded in translating three broad criteria into more concrete expectations understood by HEIs as well as external reviewers?

In assessing these questions, AI will draw on the results from the continual evaluations of IA 2.0 (see initiatives 5 and 6 above) while also taking into account the experiences AI consultants and accreditation panels have had applying the three criteria in review-processes.

ESG 2.2 – panel recommendations

“The panel recommends that the agency should develop a continuous monitoring to its comprehensive approach, especially regarding the idea of differentiation and fitness for purpose. In particular, the agency should reflect on how to make the current system of IA effective for large and comprehensive institutions.”



Initiatives by AI

10. *Monitoring AI's approach to institutional accreditation.* AI monitors its approach to institutional accreditation through the continuous evaluation of IA 2.0 (see initiative 5). It includes a specific focus on whether IA 2.0 takes into account the specificities and characteristics of institutions.
11. *Increased focus on AI's approach regarding institutions of different sizes.* AI will examine the current practice for adjusting IA 2.0 to institutions of different sizes. The selection of audit trails and cases is crucial in this context, as it is a way to differentiate between smaller and larger institutions. AI will explore this question further in relation to the third round of institutional accreditation. This process will involve internal as well as external stakeholders, as described in initiative 9 (ESG 2.1).

ESG 2.3 – panel recommendations

“The agency should strive to improve the degree of coordination with the AC regarding guidelines and decision-making processes in order to ensure greater clarity of the whole review process in IA 2.0.”

Initiatives by AI

12. *Focus on transparency and predictability for HEIs.* AI and the Accreditation Council have issued two documents in order to ensure transparency and predictability for HEIs in the review process as well as in the decision-making process. AI and the Council are responsible for one document each but have consulted each other when writing these texts to ensure coordination:
 - AI's Institutional Accreditation 2.0 Guidelines: AI issued its guidelines regarding the second round of institutional accreditation in August 2019 (revised September 2021 regarding the maritime educational institutions). Unlike the first round of institutional accreditation, AI has not issued any supplementary notes to the 2.0 Guidelines. On the contrary, all relevant information is now included in the Institutional Accreditation 2.0 Guidelines in order to contribute to clarity of the review process for HEIs.
 - The Council's memorandum about assessing quality assurance systems at institutions in the second round of institutional accreditation: In December 2020, the Accreditation Council issued its memorandum, which is addressed to HEIs and to accreditation panels and underlines that the Council is the decision-making body. The memorandum reflects what the Council emphasizes when deciding whether to award positive accreditation, conditional positive accreditation or to refuse accreditation. The memorandum is in accordance with AI's work, as it is based on information derived from the Accreditation Act, the ministerial order on accreditation and AI's Institutional Accreditation 2.0 Guidelines. The memorandum clarifies the connection between the expectations in AI's Institutional Accreditation 2.0 Guidelines and the three decision categories of the Council mentioned



above. The Council has only revised the memorandum once since 2020 (in June 2022) in order to assure certainty regarding the decisions of the Council.

ESG 2.5 – panel recommendations

“The panel recommends that the agency should devote greater efforts to design clearer and consistent criteria regarding decision-making and review processes in a coordinated way with AC to avoid any uncertainty.”

Initiatives by AI

See initiative 12 (ESG 2.3)

ESG 2.6 – panel recommendations

“The agency should devote more attention to the consistency of reports to avoid the perception among some stakeholders that these reflect the quality and commitment of the reviewers.”

Initiatives by AI

13. *Monitoring the stakeholders’ perception of review-reports.* As part of the ongoing evaluation (see initiative 5), HEIs provide feedback on the quality of the accreditation report. They are asked to assess to what degree the report:
 - provides an accurate description of the QA-system at the institution
 - applies clear and consistent arguments
 - has incorporated the HEI’s hearing statement to a satisfactory degree

AI processes feedback and suggestions for improvement as part of the ongoing work to improve processes and reports.

14. *Writing course for consultants.* AI has put together a tailor-made writing-course with the help of an external instructor to help further enhance the writing-skills among consultants. All consultants participate in the course biennially as part of a compulsory, internal training programme which has been in place since 2021. Furthermore, AI has writing guidelines to supplement the existing report templates. The writing guidelines helps consultants write in a clear and consistent language and helps ensure a consistent style of writing across different reports.
15. *Focus on internal feedback throughout the writing process.* AI emphasizes feedback throughout the review process, including the initial analysis and writing process. With the aim of strengthening internal feedback processes, AI has refined the feedback structure. As a result, the two Directors of Operations from KSU as well as a senior colleague read and comment on drafts of the report throughout the review process. This feature promotes even further the focus on consistency already in place because the two Directors now read all reports at several stages and thereby are



better able to continuously compare across reports to ensure consistency and common standards.

16. *New organizational structure supports consistency.* AI's organizational structure as well as the working-processes are designed to promote knowledge sharing and support consistency in the reports. Two aspects are worth highlighting:
- All consultants are now part of the same department (KSU) rather than split in two (previously PEM and UNIK).
 - AI makes sure all IA 2.0-teams (typically 2-3 consultants) consist of both new and more senior consultants. This principle helps ensure that the different teams are comparable in terms of familiarity with the methods and processes involved in the IA review.

ESG 2.7 – panel recommendations

“The agency should consider the establishment of a separate body that could analyse the institutions’ complaints within the remit of the agency”

Initiatives by AI

17. *Dialogue with the Ministry of Higher Education and Science about a new appeal committee.* After the ENQA Review in 2021, AI has had several meetings with the Ministry of Higher Education and Science concerning the handling of complaints and appeals. There is now a mutual understanding about exploring a solution that will make it possible for the Accreditation Council to set up a separate committee in case an institution submits an appeal against the decisions made by the Council. This initiative will complement the already existing possibility of appealing against legal errors and omissions in the accreditation procedures to the Minister for Higher Education and Science. The purpose of the committee will be to scrutinize the assessments made by the Council and the accreditation panel. Based on this, the committee will recommend to the Council whether it should reconsider its decision or not.