



**Agency for Science and Higher Education**  
Improvement of quality assurance  
and enhancement systems in higher education

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**ENQA SECRETARIAT**  
**Avenue de Tervuren, 36-38 – bte 4**  
**1040 Brussels, Belgium**

**Subject: ASHE Action plan for follow-up of the 2016 ENQA Review**

Dear colleagues,

Please find our Action Plan below.

It is important to note that Croatia is in the process of changing the legal framework for higher education in general and quality assurance specifically – this is the same legal change that had been planned for 2016, but it has not taken place yet and should, according to the current plans, be completed by the end of 2018. While this is the task of the competent Ministry, with ASHE participating as one of the most important stakeholders, this should present a re-thinking of the overall framework with significant improvements to the quality assurance framework of Croatian higher education. This Action Plan thus lists what ASHE has been able to achieve outside necessary legal changes.

In the light of the planned follow-up visit, we would like to be able to discuss the way we will be implementing the new legal framework once it is adopted, and would thus like to plan the visit for February 2019. At the moment, ASHE is completing the reaccreditation of doctoral programmes and implementing the pilot procedures of the new cycle of institutional reaccreditations and audits; revision of the initial programme accreditation procedure within the existing framework (but to be kept in the revised one, with the necessary changes) is to take place in 2018.

With kind regards,

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RECOMMENDATION	IMPLEMENTATION
ESG 3.1: The Agency is recommended – as is also envisaged and stated in the SAR – to strengthen the participation of international experts in its governance body and/or, if such should be established in the future, its advisory bodies, thus adding an international perspective to its operations at the level of institutional decision-making.	The Agency has appointed a foreign member (an academic from Slovenia) to the Accreditation Council as an associate member without voting rights. Adding international members with full voting rights to the Council and/or other bodies of the Agency requires a legislative change.
ESG 3.5: ASHE is suggested to study the possibility of assigning more resources to the Audit processes in order to finalize the first cycle of evaluations at the present qualitative and quantitative levels, and to run the procedure in its entirety, namely by including colleges which have not been subjects to audits yet.	At the beginning of the 1st round of audits in 2010, it was decided to conduct the audit procedure at the level of public universities and polytechnics first, but also include other institutions (including colleges) that volunteer. The scope of implementation was defined by taking into account the resources available for a set 5-years cycle, and with regard to the number of HEIs in Croatia. Voluntary implementation is also in line with the very nature of the audit procedure (evaluation instead of accreditation) – this is an advisory process, aimed at strengthening HEIs' internal QA capacities. The strategic decision to keep the audit voluntary is also in line with the announced changes to the new Act on Quality Assurance. This being said, the audit procedure has been revised in 2017 and the voluntary pilots are ongoing in 2018, showing that the HEIs do have an interest in this procedure.
ASHE is recommended, in particular also in the view of the increase in the number of accreditation procedures, to reflect on the workload it will entail for the present staff structure, and to take action if necessary.	ASHE has hired 1 new intern for administrative support to the reaccreditation procedure and 1 senior member of staff in the Department of Analytics and Statistics, the staff of which also participate in the accreditation procedures. Additionally, 2



	<p>members of staff were transferred to accreditation activities and 3 students were hired for administrative tasks to free up time of staff working in reaccreditation.</p> <p>ASHE has also launched a process of annual planning of goals and activities to the employee level, introducing annual employee appraisals, with a view of making its work more efficient. The new ASHE operational plan is to be adopted by spring 2018.</p>
<p>ESG 2.1: ASHE is recommended, within the new accreditation models to be used in the next cycle, to focus on a more qualitative analysis of the criteria, which is, at this time, more quantitative-focused, taking particularly in account the specific qualitative features in ESG Part I mentioned above.</p>	<p>ASHE has:</p> <ul style="list-style-type: none"><li>– Already in the procedure of the reaccreditation of doctoral programs, improved the rules of decision-making and the way recommendations to the ministry are written, so that the qualitative features are emphasised and used as the main basis for decision.</li><li>– In the new model of institutional reaccreditation which is being piloted in 2017 the focus was on developing the quality criteria which would comprehensively check for everything listed in the ESG part 1. A major change has been emphasising the qualitative aspect while checking the minimal legal conditions (which are quantitative) within the standards, together with other indicators of quality. Also, in the new model of reaccreditations, the duration of the site visits has been prolonged with additional time given to the reviewers to check the documentation enable more in-depth qualitative analysis (see: <a href="#">new reaccreditation standards</a> and a sample site visit protocol, annexed).</li></ul>



	The recommendation is also being taken into account in drafting the new legislation.
The Agency is recommended to produce a follow-up report in 2018 on the state of advancement and the impact of SKAZVO Project on the criteria of all the accreditation procedures referring to ESG part I and particularly on learning outcomes and reference to the Qualifications Framework.	The pilot new cycle reaccreditations are already looking at the link to the CroQF and a report on the success of the pilots will be produced in spring 2018 (see: <a href="#">new reaccreditation standards</a> ). However, because the results of the SKAZVO project have to be fed in the legislative changes, we will produce the report once they are adopted – according to current Ministry plans, by the end of the year.
ESG 2.2: ASHE is recommended to run Doctoral study programmes' accreditation through a unique procedure rather than two separate ones, and to take this objective into account during future legal negotiations.	Separate reaccreditations of doctoral programmes are to be completed by the end of 2018; as noted, this is a one-time exercise and already its follow-ups will be merged with the new cycle of institutional reaccreditations.
ASHE is recommended to consider possibilities to introduce concepts of “self accreditation rights for programmes” to the benefit of HEI’s who have shown strong evidence for the existence of a robust internal quality management and quality assurance system. It could be connected with audit in future development of ASHE procedures and policies and should involve regular self-evaluation of study programs by internal QA systems at higher education institutions.	This is considered in drafting the new legislation; currently all public universities have such rights and no one else has.
ASHE is recommended to reflect on a way of encouraging the HEIs to participate in the future Audit procedure, if it were to be voluntary, and to optimize its articulation with accreditation	ASHE is conducting regular trainings of HEIs, including the organisation of conferences (e.g. CroQAnet) and thematic workshops in situ, on the necessity of a strong institutional QA



<p>processes in order to avoid overlap, to foster the quality culture and to help improving Institutional internal quality assurance processes.</p>	<p>system, which is also in line with new developments in EHEA (transition from programme to institutional evaluation, in which internal QA units at HEIs play a significant role). Institutions shall be continuously encouraged at such events to participate in audit procedure, as it is specifically aimed at strengthening of internal QA systems and QA units. With new audit model (currently undergoing a pilot-procedure) any previous overlaps with other ASHE procedures will mostly be avoided, namely:</p> <ul style="list-style-type: none"><li>– the procedure focuses on PDCA cycle</li><li>– it does not end with formal outcome but a certificate and/or recommendations for improvement</li><li>– additional emphasis is placed on an informed peer-assessment and “appreciative approach”, i.e. assessment of efficiency rather than the validity of a chosen model of internal QA.</li></ul>
<p>The Agency is strongly recommended to ensure a link of the new CROQF procedure to be launched in 2017 with accreditation procedures of any kind. In doing so, ASHE should also ensure provision of a more flexible approach to capture specificities of certain programmes which differ from the usual academic features, such as the arts, in a more adequate, flexible manner.</p>	<p>As noted above – this is considered in drafting the new legislation.</p> <p>The revised ASHE accreditation procedure checks the alignment of programmes with the CROQF, and no separate CROQF procedures have been developed so far.</p>
<p>ESG 2.3: ASHE is recommended to look at the over-burdening effects to be witnessed in its Reaccreditation Procedures. The Agency is encouraged, when possible, to extend the site-visit</p>	<p>As noted above, this has been implemented in the new cycle of reaccreditations pilot procedures: site visits no longer last 3 but 5 days, with first day left for training, 3 spent on the HEI and the last</p>



<p>duration in order to allow the panels to carry out more in-depth analysis resulting in more concrete recommendations in the reports, and to ask HEI's for providing more evidence before the visit.</p>	<p>in drafting the final report. A new IT system has been produced which improved the data collected by HEIs and now enables various types of analyses which are produced for the panels before the visit. The schedule of the time spent on HEIs has been improved to leave more time for the panels to check the documentation and evidence (sample schedule is annexed). The meta-report on the pilots will be completed in spring 2018.</p>
<p>ASHE is recommended to consider the inclusion of a follow-up procedure in the Initial Accreditation of study programmes, thus allowing applicants to remedy any shortcomings of minor significance.</p>	<p>Again as noted above, this will be done with the scope of legislative changes.</p>
<p>ESG 2.4: ASHE is recommended to automatize, if possible, the presence of a representative of society, e.g. a business sector representative, in all its re-accreditation panels.</p>	<p>In line with the <a href="#">new reaccreditation procedure</a>, society representatives will be included in the panels whenever possible.</p>
<p>It is also recommended to organize a training (face-to-face or virtual) in the national context (due to the high number of international experts involved in the processes) but also on the interpretation of the criteria for the procedures the experts are expected to apply in the initial and re-accreditation processes.</p>	<p>The on-site training for panels before the site visit has been prolonged to a whole day in the new model of reaccreditation specifically to enable foreigners to better understand the Croatian legislative framework and ASHE procedures. Additionally, regular training sessions have been introduced for the Croatian members of panels, with two held in 2017 (one for academics and one for students). These trainings were held by ASHE staff in cooperation with experts from the Croatian academia.</p>
<p>ESG 2.5: ASHE is recommended to be more transparent as regards information on the overall policy of the criteria used by the Accreditation Council, as the decision-making body of the Agency, with a view to clarifying in which cases unconditional accreditation</p>	<p>The <a href="#">new reaccreditation procedure</a> clearly defines the decision-making and assessment criteria to be used by panels as well as the Accreditation Council.</p>



or accreditation accompanied by a letter of expectation is to be expected.	
ASHE is recommended to iterate its endeavours to clarify the interpretation and implementation of the quality criteria, both by means of interpretative documents and through schooling.	Already in the reaccreditation of the doctoral programmes, ASHE has introduced: <ul style="list-style-type: none"><li>– Clear rules for decision-making which are published and obligatory for the panels and the Accreditation Council</li><li>– Cluster panels with the panel president aligning the recommendations of all reports to ensure consistency</li></ul> The new reaccreditation standards are explained in detail through the elements they include with lists of examples of indicators and evidence. Such an approach (the standards include their own explanations) helps HEIs in self-evaluation, as well as panels in assessment. The pilot procedures have shown that this approach has significantly improved the understanding and interpretation of the standards.
ESG 2.6: ASHE is recommended to include a more in-depth analysis of the compliance of the HEI or study programme against the criteria in its published reports.	The reaccreditation pilot reports are being completed, and all the improvements listed above are reflected in the comprehensiveness and depth of analysis in the drafts. Also as noted above, all reports will be completed and analysed by spring 2018. .
ASHE is recommended to publish the full reports of the Initial Accreditation procedure.	The full reports have been <a href="#">published online</a> (in Croatian).



ESG 2.7: In the case of the re-accreditation procedure for Higher Education Institutions and study programmes, ASHE is recommended to provide a separate and standing Appeal Committee in order to dissociate the decision on the appeal from the Accreditation Council that has made the initial decision which is being appealed against. ASHE may also consider to establish the Appeal Committee as a standing committee, or to consider other modes of precaution to safeguard against any undue influence, which may occur when installing it ad hoc in view of the concrete case.

Regarding initial accreditation of study programmes and Higher Education Institutions, ASHE is recommended to provide an appeal procedure within the Agency

ASHE has drafted the necessary documentation to appoint a separate standing Appeal Committee and is in the process of establishing such a body (collecting nominations from stakeholders).