

ENQA AGENCY REVIEW

AGENCY FOR SCIENCE AND HIGHER EDUCATION (ASHE)

TIA LOUKKOLA, ASNATE KAZOKA,
TADEJ TUMA, DAMIAN MICHALIK
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EXECUTIVE SUMMARY

The Agency for Science and Higher Education (ASHE, Croatia) was established in 2005 by a Government Decree (OG 101/04, 08/07) as a public body and was responsible for providing professional and administrative support to the National Council for Higher Education in the implementation of external evaluation procedures. In 2009, upon the Act on Quality Assurance in Science and Higher Education (OG 45/09), it became the only national public body responsible for carrying out independent external evaluation in higher education and science in Croatia and has kept this position until now.

This external review report analyses how ASHE meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an ENQA coordinated review conducted from April 2021 to September 2021 with an online site visit between 7th and 9th June 2021.

The purpose of this review is to evaluate the extent to which ASHE fulfils the requirements of Parts 2 and 3 of the ESG and provide the basis to the ENQA Board for deciding on reconfirmation of ASHE's membership in ENQA as well as to the EQAR for renewing the agency's registration.

This is the third review of ASHE against the ESG, following the reviews in 2011 and 2017. In 2011 ASHE was judged as fully compliant with 15 out of 16 standards.

Between 2011 and 2017 several developments in the national context took place - the Law on Croatian Qualifications Framework was adopted and a national Strategy for Education, Science and Technology for the period 2014-2020 was ratified. These developments also implied changes in the operation of ASHE.

In 2017, in the review against the ESG 2015, ASHE was found to be fully compliant with 7 standards, substantially compliant with 5 standards (2.1 Consideration of internal quality assurance; 2.2 Designing methodologies fit for purpose; 2.3 Implementing processes; 2.4 Peer-review experts; 2.6 Reporting) and partially compliant with 2 standards (2.5 Criteria for outcomes; 2.7 Complaints and appeals).

In this review carried out in 2021, the panel concludes that ASHE is fully compliant with 13 standards out of 14 and substantially compliant with the ESG 3.1 (Activities, policy and processes for quality assurance). The panel also makes some suggestions for further improvements and provides two additional observations.

INTRODUCTION

This report analyses the compliance of the Agency for Science and Higher Education (Agencija za znanost i visoko obrazovanje, ASHE) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted from November 2020 to September 2021.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

The panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, in line with the *Guidelines for ENQA Agency Reviews*, which identify continuous enhancement of the agencies as one of the aims set out for the reviews.

MAIN FINDINGS OF THE 2017 REVIEW

The 2017 review panel concluded that ASHE was fully compliant with standards of ESG Part 3.

In regard to ESG Part 2, the panel concluded that ASHE was either substantially or partially compliant with all standards. ASHE was found to be **substantially compliant** with the following standards:

2.1 Consideration of internal quality assurance

The panel recommends ASHE, 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 into account the specific qualitative features in ESG Part I mentioned above.

The panel recommends 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.

2.2. Designing methodologies fit for purpose

The panel recommends ASHE 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.

The panel recommends considering possibilities to introduce concepts of "self accreditation rights for programmes" to the benefit of HEIs 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 programmes by internal quality assurance systems at higher education institutions.

The panel recommends ASHE 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 processes in order to avoid overlap, to foster the quality culture and to help improving Institutional internal quality assurance processes.

The panel strongly recommends ASHE to ensure a link of the new Croatian Qualifications Framework (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.

2.3. Implementing processes

The panel recommends ASHE to look at the over-burdening effects to be witnessed in its Re- accreditation Procedures, and it encourages the Agency, when possible, to extend the site-visit 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 HEIs to provide more evidence before the site visit.

The panel recommends ASHE to consider the inclusion of a follow-up procedure in the Initial Accreditation of study programmes and Higher Education Institutions, thus allowing applicants to remedy any shortcomings of minor significance.

2.4. Peer-review experts

The panel recommends ASHE to automatize, if possible, the presence of a representative of society, e.g. a business sector representative, in all its re-accreditation panels.

It is also recommended to organize a training (face to face or virtual) about the national context (due to the high number of international experts involved in the processes) as well as on the interpretation of the criteria for the procedures the experts are expected to apply in the initial and re-accreditation processes.

2.6. Reporting

The panel recommends ASHE to include a more in-depth analysis of the compliance of the HEI or study programme against the criteria in its published reports.

The panel recommends ASHE to publish the full reports of the Initial Accreditation procedure.

ASHE was found to be **partially compliant** with two standards:

2.5. Criteria for outcomes

The panel recommends ASHE 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 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.

2.7. Complaints and appeals

The panel recommends in the case of the re-accreditation procedure for Higher Education Institutions and study programmes, 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, the panel recommends ASHE to provide an appeal procedure within the Agency.

The ENQA Board endorsed all recommendations formulated by the review panel and, in addition, emphasised the necessity to closely follow and report on the progress concerning the SKAZVO project that could potentially affect the criteria for accreditation processes.

When considering the ASHE's application for renewal of EQAR registration, the EQAR Register Committee flagged two additional issues related to 2.2. Designing methodologies fit for purpose and 2.6. Reporting.

The EQAR Register Committee had previously flagged the issue of duplication between different ASHE's review processes. When considering the ASHE's application for renewal of EQAR registration, the Register Committee concluded that the flag was not addressed and remained a matter deserving the urgent attention of both ASHE and the Croatian Ministry of Science and Education, responsible for the legal framework of the external quality assurance processes implemented by ASHE. Given that all processes deployed by ASHE in themselves were fit for purpose and developed in line with the standard, while the overlap and duplication were primarily the result of the typology of external quality assurance processes prescribed by law, the Register Committee was nevertheless able to concur with the panel's conclusion that ASHE complies with the standard.

Also, the Register Committee had previously flagged the accessibility and readability of ASHE reports. The Committee noted that ASHE had taken several steps to enhance the accessibility and readability of its reports during the previous five years, including the publication of summary reports. The Committee therefore concluded that the flag had been addressed. However, the 2017 review report noted that the reports on initial accreditation were not published, despite ESG 2.6 clearly requiring all external quality assurance review reports to be published. Therefore, the Register Committee still judged the standard 2.6 only as "partially compliant".

REVIEW PROCESS

The 2021 external review of ASHE was conducted in line with the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of ASHE was appointed by ENQA and composed of the following members:

- Tia Loukkola (Chair), Director, EUA's Institutional Evaluation Programme, nominated by the European University Association;
- Asnate Kazoka (Secretary), Head of Development and International Cooperation Unit, AIC agency, Latvia;
- Tadej Tuma, Professor in Electrical Engineering, University of Ljubljana, Slovenia;
- Damian Michalik, PhD student in Physics, University of Warsaw, Poland, nominated by the European Students' Union, member of the European Students' Union Quality Assurance Student Experts Pool.

The review panel received the self-assessment report (SAR) in April 2021 and immediately started the analysis against the ESG. In May 2021 the ENQA review coordinator facilitated a briefing call where the panel agreed on additional information to be requested and discussed the outline of the meeting schedule. Before the site visit the panel met several times to discuss the preliminary findings and agree on the issues to be further explored. The panel conducted an online site visit from 7th to 9th June 2021 during which it further examined the information provided in the SAR and cross-checked other evidence provided by ASHE. The site visit took place in English with a simultaneous translation available on request. The translation was provided by an independent translator that was approved in advance by ENQA.

The external review report is based on the SAR, further material provided by ASHE, information collected during the site visit and other evidence available to the review panel on public domain (such as the agency's website, the EQAR register). The review panel provided an opportunity for ASHE to comment on the draft report. The review panel confirms that it was provided access to all

documentation and internal and external stakeholders of ASHE that it wished to consult during the review process.

Self-assessment report

The ASHE's SAR was provided to the review panel approximately six weeks before the site visit. It contained links to all the relevant regulatory documents, either included directly into the report or provided as an annex.

The SAR was produced by a team appointed by ASHE. The draft report was submitted for comments to all employees of ASHE and further sent for input from the Management Board and Accreditation Council in February 2021. After completing the report internally, it was sent to the stakeholder organisations – the Rectors' Conference, the Council of Polytechnics and Colleges and student and employer organisations. The preparation of the SAR started in December 2020 and was completed in April 2021.

The review panel appreciated the high quality and analytical approach of the SAR. From the report it was evident that ASHE had focused on demonstrating the improvements made since the last external review and all recommendations by ENQA and EQAR had been addressed.

A relatively small number of additional documents and further information was requested from ASHE. Most of the requests were related to issues that were evident from the SAR but were not further analysed by ASHE. As one of the members of the review panel had a good command of Croatian, the review panel agreed that the documents that exist only in Croatian could be provided in the original language, without need to translate them.

Site visit

Due to the uncertain travel conditions caused by COVID-19 pandemic, it was agreed between the ASHE, ENQA and the review panel that the site visit would take place online, from June 7th to June 9th, 2021, with a preliminary meeting with ASHE representatives organised on 1st June 2021. The visit schedule was agreed with ASHE prior to the visit. Thanks to the excellent technical arrangements the panel was able to successfully conduct interviews with all key internal and external stakeholders of the agency. The representatives met by the panel were open and willing to share their experience with ASHE and provided a detailed overview of the ASHE's role in national context and its activities.

The interviewed stakeholders represented:

- ASHE staff (also the team responsible for drafting the SAR),
- ASHE Management Board,
- ASHE Accreditation Council and Follow-Up Committee,
- ASHE Complaints Committee
- Ministry of Higher Education and Science,
- Representatives of the reviewed higher education institutions,
- Members of review panels, including student and labour market representatives,
- Stakeholders of ASHE, including students, Rector's Conference, Council of Polytechnics.

The additional information requested by the review panel both before and during the site visit was provided in a timely manner and in sufficient detail. All requests for composition of the interviewed groups were taken into account and requests for additional meetings were immediately accepted.

The panel used the opportunity to clarify several pending issues with the ASHE managing team on the last day of the visit. The preliminary findings of the review were shared with the ASHE managing team at the end of the visit. A full list of meetings including the names of the interviewees is available in Annex I of this report.

The review panel confirms that it had access to all the relevant information that was required for assessing ASHE's compliance with the ESG and that ASHE was willing to engage in discussions about possible improvements in the future.

The panel would like to thank ASHE's staff and especially to Prof. Jasmina Havranek for open and welcoming attitude and the excellent preparatory work done prior to the site visit. The panel expresses special gratitude to the liaison person Ms. Emita Blagdan for her availability and responsiveness throughout the review process. The panel also thanks the ENQA Reviews Manager and coordinator of this review, Goran Dakovic for his support during the review process and for the input to ensure consistency of the reviews.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Croatia has been a full member of the Bologna Process since 2001 and there have been many key developments in the higher education system in the last 20 years, including the introduction of the three-cycle system, European Credit Transfer and Accumulation System, alignment with the European Qualification Framework etc.

There are currently 117 higher education institutions with a total of 162,928 students in Croatia. These include 12 universities (9 public and 3 private), 71 faculties and art academies as a part (constituents) of universities, 17 polytechnics (11 public and 6 private) and 18 colleges (3 public and 15 private). The total number of accredited study programmes delivered by all higher education institutions in 2021 is 1580. The majority of these programmes provide graduate and undergraduate university-level studies.

The higher education system is regulated by the Act on Scientific Activity and Higher Education. It defines the types of higher education institutions and requirements for their classification. The universities (and their constituents) can deliver university level study programmes and, in exceptional cases, professional study programmes while the polytechnics and colleges can deliver professional study programmes only. The universities are required to offer education in at least two scientific areas and a large number of fields within these areas. The polytechnics are required to deliver at least three study programmes in three different scientific fields. There is no minimum requirement for colleges in regard to the number of scientific fields.

A specific characteristic of the Croatian higher education system is the existence of constituents meaning that the four major universities are not fully integrated and their external quality assurance procedures take place on the level of faculties or academies (constituents). The higher education system is to a large extent financed from the state budget and a number of processes, for example, the recruitment and promotion of teachers is regulated on the level of state and not the higher education institutions.

QUALITY ASSURANCE

The development of quality assurance in higher education in Croatia started in the 1990's with establishment of the National Council for Higher Education that was responsible for conducting external evaluation of higher education institutions and study programmes.

ASHE was established in 2005 with the task to provide expert and administrative support to the National Council for Higher Education.

In 2009, according to the Act on Quality Assurance in Science and Higher Education (OG 45/09), ASHE became the only national public body responsible for external evaluation in science and higher education in Croatia. The National Council for Higher Education (now called the National Council for Science, Higher Education and Technological Development) became the top strategic and expert body in charge of development of the system of higher education, science and technological development.

AGENCY FOR SCIENCE AND HIGHER EDUCATION

The Agency for Science and Higher Education (ASHE) was established in 2005 by the Government Decree as an independent public body with the task to implement external evaluation in science and higher education. In 2009 the role and independence of ASHE was reinforced, and the Law defined ASHE as the only body that could perform external evaluation in science and higher education in Croatia.

ASHE'S ORGANISATION/STRUCTURE

ASHE is overseen by the Management Board while the daily activities are organised and managed by the ASHE Director. The Accreditation Council, Follow-up Committee and Complaints Committee ensure the execution of external quality assurance processes.

The Management Board consists of nine members appointed for a four-year term. The candidates are proposed by different stakeholders, including the Government of the Republic of Croatia, the Rectors' Conference, the Council of Polytechnics and Colleges, the National Council for Science, Higher Education and Technological Development and the Croatian Student Council. The Chair of the Board and seven members are appointed by the Croatian Parliament, but one member is appointed by ASHE from its employees. The Management Board takes decisions on the main strategic and organisational issues of ASHE, including the adoption of Statute, annual budget, annual work programme, financial report, and annual report as well as the appointment and dismissal of the Director and Assistant Director.

The ASHE Director has the mandate to represent and act on behalf of ASHE through independently carrying out legal actions. The Director is responsible for organising and managing all daily activities. The Director is appointed by the Management Board following a public competition. The ASHE Director has the right to participate in the activities of the Management Board and Accreditation Council without a decision-making power.

The Accreditation Council of ASHE is a permanent expert body that adopts the relevant internal methodological documents for carrying out external evaluations and issues the final opinions on the outcomes of the external evaluation processes. The final decision on accreditation is then taken by the Ministry for Science and Higher Education based on the Council's opinion. The Accreditation Council consists of 11 members appointed by the Management Board for a four-year term. The members can be either nominated by the stakeholder organisations or selected through a public call. Currently all members of the Accreditation Council have been nominated by the stakeholder

organisations. The Accreditation Council has two associate members without voting rights, one of which is from Slovenia.

In 2018 ASHE established a related Follow-Up Committee. Its members are appointed by the Accreditation Council and the president of the committee is at the same time a member of the Accreditation Council.

Also in 2018, a Complaints Committee was established. It is an internal body of ASHE to which complaints on the opinion of the Accreditation Council can be submitted. This committee consists of three members and alternate members that are appointed by the Management Board for a period of three years based on the proposal of the Rectors' Conference and Council of Polytechnics and Colleges.

ASHE currently employs 72 staff members from which according to the SAR 20 are directly involved in external quality assurance activities.

ASHE is structured in 5 areas of activity which comprise sixteen departments. The areas of activity are – Directorate for Higher Education, Directorate for Science, International Cooperation, General Administration and Central Applications Office. In addition, there is the Director's Office and Office of internal quality assurance. The main area in charge of external evaluation processes is the Directorate for Higher Education which contains four separate departments (Department of Higher Education, Department of Accreditation in Higher Education, Audit Department and Department of Analytics and Statistics). In its activities the Directorate for Higher Education cooperates closely with the other structural units of ASHE, especially with the IT department and Office of Internal Quality Assurance.

ASHE'S FUNCTIONS, ACTIVITIES, PROCEDURES

According to the legal framework, ASHE is responsible for a number of procedures related to higher education and science.

According to the Terms of Reference attached to this report, the following activities are within the scope of this review:

- 1) Initial accreditation – a mandatory assessment for all new higher education institutions and new study programmes offered by private higher education institutions (universities, polytechnics and colleges) and public polytechnics and colleges. The aim of this process is to check the fulfilment of relevant accreditation criteria.
- 2) Re-accreditation of higher education institutions – a mandatory assessment for all public and private higher education institutions. The aim of this process is to assess whether the higher education institution meets the requirements of the national criteria and the ESG.
- 3) Re-accreditation of the part of the activities of higher education institutions (Re-accreditation of PhD study programmes) carried out in the period from 2017 to 2021 based on the request from the Minister. The aim of this one-off process, in addition to checking compliance with the legal requirements, was to ensure that the study programmes leading to PhD's are of high quality and internationally comparable.
- 4) Audit of a higher education institution – mandatory assessment of the internal quality assurance system of a higher education institution against the ESG Part I and ASHE Audit Criteria. The aim of this process is to encourage continuous development of the higher education institutions' internal quality assurance and quality culture.
- 5) Thematic evaluation in higher education – the assessment for checking, evaluating and developing the quality of higher education institutions and/or study programmes within the

scope of specific themes. These evaluations are performed either according to the annual plan of ASHE or following a request from the Minister, higher education institution or student council of the higher education institution. In the last six years there have not been any requests for thematic evaluation, nor are any foreseen in the ASHE strategic documents provided to the review panel.

When analysing the different activities in the upcoming sections of this report, the review panel has made a differentiation between the first four activities (initial accreditation of higher education institutions and study programmes, re-accreditation of higher education institutions, re-accreditation of the part of the activities of higher education institutions and audit of higher education institutions) and the thematic evaluation in higher education.

Thematic evaluations were identified in Terms of Reference as being part of this review. However, ASHE confirmed the ad-hoc nature of thematic evaluation and stated that it takes place according to a specific methodology that is developed separately for each thematic evaluation. Although the latest thematic evaluation was conducted in 2014, the ASHE website includes a separate section for this activity and the final reports for all thematic evaluations have been published there. The published reports do not include any references to the ESG and ASHE has not provided a mapping of any of its thematic evaluations against the ESG Part I.

In the opinion of the review panel, the thematic evaluation in higher education can be compared to a research study which results could be used as a basis for conducting a comprehensive evaluation procedure covering the ESG Part I. For example, the latest thematic evaluation conducted in 2014 (Thematic evaluation of doctoral study programmes in the Republic of Croatia) has resulted in the re-accreditation of PhD study programmes carried out from 2017 to 2021. Further, the thematic evaluations do not evaluate individual higher education institutions (or parts of them) or programmes, nor do they address the effectiveness of internal quality assurance as defined in the Part I of the ESG. Therefore, the review panel concurs with the 2017 panel in stating that thematic evaluations should not be considered external quality assurance activities as defined by the ESG (standard 2.1). The review panel has not taken into account thematic analysis in the overall judgement for each standard. The review panel has, however, taken the Terms of Reference into account and will discuss the compliance of thematic evaluations in each section to provide information on to what extent the principles of the ESG are applied in them.

ASHE has also performed several external quality assurance processes abroad. In 2016 ASHE completed the audit of the International School for Social and Business Studies (Slovenia) following the ASHE methodology for audit and in 2017 the re-accreditation of the University of Mostar (Bosnia and Herzegovina) following the ASHE methodology for re-accreditation of higher education institutions.

At the time of the review the review panel learned that ASHE was conducting several cross-border assessments following newly developed methodologies – external evaluation of joint study programmes in accordance with the European Approach for Quality Assurance of Joint Programmes, accreditation of study programmes (currently in Ukraine) and the external evaluation of Agencies for Quality Assurance in Higher Education aimed at renewing their EQAR registration. At the time of the site visit none of these assessments were completed. These activities were not included in the Terms of Reference for this review and have therefore not been elaborated in the ASHE SAR. From the documentation provided and the ASHE website the review panel can conclude that these activities are in line with the ASHE strategic goals and there is an intention to continue them in the future.

In addition to the activities mentioned above, ASHE performs external evaluations in science – initial accreditation for scientific activity, re-accreditation of scientific organisations, thematic evaluation in science and evaluation for the purpose of establishing centres of excellence in research.

ASHE is also in charge of several activities other than assessments. ASHE serves as the national ENIC (European Network of National Information Centres on academic recognition and mobility) and NARIC (National Academic Recognition Information Centres) office which is responsible for the recognition of foreign higher education qualifications, it performs data collection and processing in the area of education and science through MOZVAG, Directory of Accredited Study Programmes in the Republic of Croatia and Directory of Study Programmes conducted in Croatia in foreign languages, administrates student applications for higher education study programmes, provides administrative support to several strategic and professional stakeholder entities in Croatia and carries out different educational and international activities.

Furthermore, it is planned that in near future ASHE would take over the management of the Croatian Qualifications Framework (CROQF) Register.

ASHE is a full member of ENQA, the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEENQA), an international association of institutions interested in the topic of academic ranking and excellence in higher education and science – IREG Observatory on Academic Ranking and Excellence (IREG Observatory) and is listed in EQAR. ASHE is also a member of the International Quality Group of the American Council for Higher Education Accreditation (CHEA), the European Consortium for Accreditation (ECA) and has an observer status in the Asia Pacific Quality Network (APQN). ASHE is a long-standing member of European networks of national information centres on academic mobility and recognition. ASHE is also a member of IAAO (International Association of Admissions Organisations), EUPRIO (European Association of Communication Professionals in Higher Education) and international association GUIDE Association – Global Universities in Distance Education.

ASHE'S FUNDING

ASHE is financed from the state budget allocated to the Ministry of Science and Education. The budget is planned for a three-year period and allocated on an annual basis. The budget is based on the annual estimation proposed by ASHE. After the budget is allocated, ASHE has the autonomy for dividing it internally. In addition to the state budget, ASHE makes use of the European Union structural funds and other funding programmes and from 2016 to 2021 it has implemented SKAZVO project. The overall budget (including the state allocation and project funding) was stable in the period from 2017 to 2020. After 2021 a slight decrease in the budget is projected due to the end of the SKAZVO project. In the future, ASHE plans to carry out cross-border evaluations to generate another source of funding that would not be dependent on state allocation.

FINDINGS: COMPLIANCE OF ASHE WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2017 review recommendation

The panel recommends – 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.

Evidence

The Act on Quality Assurance in Science and Higher Education sets out the scope of ASHE's quality assurance activities in higher education. The ASHE mission is to promote the ongoing development of quality assurance in higher education and science, with the aim of continuous quality enhancement of higher education institutions and scientific organisations, in cooperation with stakeholders. The ASHE vision is to be recognised as an example of good practice and creativity in the field of quality assurance of higher education and science at national and international level. Both the mission and vision statements are published on the ASHE website <https://www.azvo.hr/en/about-ashe/mission-and-vision>.

The activities of ASHE that are assessed within the scope of this review are:

- Initial accreditation of study programmes and higher education institutions;
- Re-accreditation of higher education institutions;
- Re-accreditation of the part of the activities of higher education institutions (re-accreditation of PhD programmes);
- Audit of higher education institutions;
- Thematic evaluation in higher education.

These activities are carried out regularly (depending on their purpose) and periodically according to methodologies developed by ASHE. The goals and objectives of each activity have been described and published on the ASHE website in a separate section "Evaluations in higher education".

Procedure	Number of procedures (2017 – 2021)
Initial accreditation of study programmes	53
Initial accreditation of higher education institutions	4

Re-accreditation of higher education institutions	55
Audit of higher education institutions	8
Re-accreditation of doctoral study programmes	114
Thematic evaluation	-

From 2017 to 2021 the following number of different assessment procedures has been conducted by ASHE.

ASHE acts according to a five-year strategy that defines the mission, vision, values and strategic goals for the next period, and it is developed with the involvement of employees, Accreditation Council and the Management Board. The current strategy has been developed for the period 2021 - 2025 and is implemented through annual operative plans adopted by the Management Board.

The Management Board consists of 9 members. They are proposed by the Government of the Republic of Croatia, the Rectors' Conference, the Council of Polytechnics and Colleges, the National Council for Science, Higher Education and Technological Development and the Croatian Student Council. One member of the Management Board is appointed by ASHE itself.

The Accreditation Council consists of 11 members nominated by the Rectors' Conference, Council of Polytechnics and Colleges, Croatian Chamber of Economy, Croatian Student Council, National Council for Science, Higher Education and Technological Development. There can also be academics selected through an open call but currently there are no such members.

The Follow-up Committee consists of 7 members appointed by the Accreditation Council, one of which is appointed from the members of the Accreditation Council and serves as the President of the committee. Currently all members of the committee are highly ranked academics.

The Complaints Committee is composed of 3 members and 3 alternate members. The members have been proposed by the Rectors' Conference and Council of Polytechnics and Colleges. All members represent the academic community.

The stakeholder involvement is very crucial for ASHE. Diverse stakeholders are represented in the Management Board, Accreditation Council, Complaints Committee, Follow-up Committee and included in the expert panels. Students are a stakeholder group highly valued by ASHE. However, the two most recent bodies – the Complaints Committee and the Follow-up Committee – do not include any student representative. The student representatives the review panel met during the site visit had a different level of awareness of ASHE activities. According to the students this might be due to the type of information channels that ASHE uses and the high turnover of student representatives

ASHE regularly performs feedback surveys for different groups of stakeholders. The results of the surveys have remained extremely positive over the last years.

Following the ENQA review panel's recommendation in 2017, ASHE has added two associate members to the Accreditation Council. One of these members is a representative of the international academic community, and the other one is a representative of a non-governmental organisation from the field of higher education and science. In order to strengthen the international dimension, the initiated amendments to the Act on Quality Assurance in Science and Higher Education included a proposal to establish a separate advisory board comprising international experts.

Analysis

Based on the evidence provided during the site visit and in written form, the review panel can conclude that the external quality assurance activities performed by ASHE are clearly defined and take place regularly, depending on their specific purpose. As explained earlier, regular assessment activities are the re-accreditation of higher education institutions and the audit of higher education institutions. The other assessments are not regular by their nature and their regularity is defined by external circumstances. This is in line with the fitness-for-purpose principle and allows avoiding duplication of processes, which ASHE has received feedback on previously.

ASHE does not offer higher education institutions any services that might create a conflict-of-interest precedent. The external quality assurance activities are also clearly separated from those tasks of ASHE that are not related to external quality assurance.

The external quality assurance activities are in line with the ASHE mission statement that emphasises continuous quality enhancement achieved in cooperation with stakeholders.

The mission and vision statements of ASHE are included in the strategy that is further transformed to annual operative plans. It is worth noting that ASHE attempts to look forward to the prospective future within development plans.

The governing structure of ASHE foresees that all the strategic documents are developed based on input from internal and external stakeholders and approved by collegial bodies consisting of stakeholder representatives. The review panel was informed by the management that good orientation in ASHE strategic goals is promoted and expected from all internal stakeholders.

It is evident to the panel that the stakeholders are actively represented in the governing and decision-making bodies and participate in development and improvement of the external quality assurance methodologies and processes. The impression that ASHE's work is highly appreciated and trusted by the higher education community streamed through all interviews. Several stakeholders considered ASHE to be the key body driving developments in Croatian science and higher education. However, the review panel notes the general level of student involvement in and awareness of the ASHE activities appear to require attention. The review panel is aware of the challenges brought in by the rapid turnover of the student population but still encourages ASHE to pay more attention to dissemination of information to the student community to raise their awareness about ASHE activities.

The review panel also learned that student participation has not been considered for the two recently established governing bodies - Complaints Committee and Follow-up Committee. According to the reasoning provided by the ASHE representatives, student involvement in these bodies was not considered as crucial because of the formal nature of activities performed by these bodies and the significant workload of the Follow-up Committee. The review panel is of the opinion that the activities of the Follow-up Committee and Complaints Committee are directly linked with the ones performed by the Accreditation Council therefore it is important to ensure student participation also in these bodies.

In 2017 the review panel recommended ASHE to address the lack of international perspective in its governance bodies. Development of a separate Advisory Board or structural changes to the composition of the Accreditation Council would, however, require amendments to the Act on Quality Assurance in Science and Higher Education that have not taken place between 2017 and 2021. In the meantime, ASHE decided to introduce two associate members to the Accreditation Council, one of which represents the international academic community. The associate member selected is from Slovenia, thus minimizing the language barrier and ensuring the possibility to actively contribute to the work of the Accreditation Council.

The representatives of the Accreditation Council confirmed that this addition of associate members has proven to be valuable. During the site visit, an opinion was also raised that the Accreditation Council could better represent the diversity of the higher education landscape in Croatia, namely, the private institutions, polytechnics and colleges, as currently the majority of council members represent large public universities.

Panel commendations

While performing a number of other functions, ASHE has managed to clearly separate and communicate to its stakeholders the external quality assurance processes.

Panel recommendations

ASHE should include student representatives in the Follow-up Committee and Complaints Committee.

Panel suggestions for further improvement

The panel encourages ASHE to continue the efforts in ensuring the international perspective in the governing and decision-making structures of the agency.

The panel proposes that ASHE considers diversifying the composition of the Accreditation Council to ensure that it better represents the diversity of the higher education landscape in Croatia.

Panel conclusion: substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

ASHE was established in 2005 by a Government Decree (OG 101/04, 08/07). In 2009, the Act on Quality Assurance in Science and Higher Education (OG 45/09) defined the role of the ASHE as the national and the only body in Croatia for quality assurance and improvement in the system of higher education and science with the mandate to carry out external quality assurance procedures. ASHE has been a member of ENQA and listed in EQAR since 2011.

ASHE is responsible for issuing the accreditation recommendations to the Ministry for Science and Higher Education based on the opinion of the Accreditation Council.

ASHE has recently started offering its services also in other higher education systems where EQAR registration is a prerequisite for operation.

Analysis

The legislation states clearly the role of ASHE as the sole body responsible for carrying out external assessments in higher education and science in Croatia. During the site visit the stakeholders, including the Ministry for Science and Higher Education, acknowledged the key role of ASHE in developing higher education and science in Croatia.

The current status of ASHE with the ENQA membership and EQAR registration enables it to operate in other higher education systems. ASHE has recently started its first international reviews and intends to continue it in the future.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Evidence

The independence of ASHE is defined by the Act on Quality Assurance, Article 3 Para. 1 which states that “the Agency shall have the status of an independent legal person with public authorities entered to the judicial records” and Article 4 Para. stating that “in carrying out the activities determined by this Act and other regulations, the Agency shall be autonomous and independent, respecting European standards and guidelines as well as international practice in the field of quality assurance in science and higher education”.

ASHE independence from its stakeholders is ensured by establishing collegial bodies for decision making purposes and by developing written rules of procedures (or guidelines) for different activities that minimise the possibility of subjective actions.

Organisational independence

The main governing body of ASHE is the Management Board, whose composition is approved by the Croatian Parliament, with the exception of one representative chosen among the ASHE employees. The composition of the Management Board is outlined in section 3.1 of this report. The Management Board approves the Accreditation Council composition, adopts the Statute of ASHE, appoints and discharges the Director and the Assistant Director, the Complaints Committee, adopts the annual work programme and budget as well as the financial report and annual report. The term of the office is 4 years and no specific procedure for dismissal is foreseen.

The composition of the Accreditation Council is outlined in section 3.1 of this report. The Council is composed through a nomination procedure and there is also a public call. ASHE has to inform the Croatian Parliament in case any reason for dismissal of a certain Accreditation Council member has arisen before the term of office expires.

The appointment of director takes place based on a public competition. The conditions for dismissal are regulated by the Institutions Act (Official Gazette 76/93, 29/97, 47/99 and 35/08).

Operational independence

The Accreditation Council adopts the plan of external evaluations, methodologies for individual evaluations and appoints the expert panels.

All experts, including the student and employer’ representatives, are selected through a public call that is launched every year. In recruiting students, ASHE makes use of several additional channels, for example, nominations by the local student unions at the universities, but the final decision is taken by the Accreditation Council.

The independence of all individuals involved in the external quality evaluation processes is ensured through a transparent nomination and selection process and statements on confidentiality and non-conflict of interest that are signed by the members of the Accreditation Committee and all members of expert panels. The independence is ensured also in the operation of the Follow-up Committee and Appeals Committee. In all decision-making bodies the respective members are obliged to abstain from decision-making in situations where a conflict may occur.

ASHE is subject to national recruitment restrictions that apply to all public (state funded) institutions (employment ban). The overall number of public employees in Croatia is constant and ASHE could recruit a new employee only if one of the current ones leaves or if a staff place is transferred from another public institution to ASHE.

Independence of formal outcomes

The outcome of the accreditation procedures by ASHE is the opinion of the Accreditation Council. The Accreditation Council issues its opinion on the basis of the documentation developed during the evaluation procedure, including the expert report. Based on the opinion of the Accreditation Council, the Ministry for Science and Higher Education decides on the final outcome of the evaluation procedure. The review panel requested information on cases where the final decision would differ from the Accreditation Council's opinion and no such cases were reported.

In case of the audits of higher education institutions, the Accreditation Council issues the final certificate.

From the discussions it was evident that the relationship between ASHE and the Ministry for Science and Higher Education is very close. The panel learned that communication on strategic issues in the higher education sector and especially quality assurance takes place on a regular basis and that ASHE regularly makes proposals for improvement that are considered by the Ministry. At the same time both the Ministry and ASHE itself emphasised the autonomy of ASHE that could be strengthened even further by delegating the final formal outcome of accreditation procedures to it which is not the case now.

The interviewees from other stakeholder groups also underlined the crucial importance for the credibility and standing of ASHE played by its independence not only from the Ministry, but also from other stakeholders, such as the institutions subject to its external quality assurance activities.

Analysis

The Act on Quality Assurance states that ASHE is an independent body. Through studying the information available, the review panel did not have any major concerns neither about organisational, nor operational independence or the independence of formal outcomes.

The organisational independence is ensured by the way how the Management Board and the Accreditation Council are composed and approved. The members of the expert panels are selected independently by ASHE and approved by the Accreditation Council. After the approval, the expert panel members are subject to statements on confidentiality and non-existence of conflict of interest.

ASHE operates according to a 5-year strategic plan that is developed in cooperation with stakeholders and approved by the ASHE Management Board. The current strategic plan is in place from 2021 until 2025. There is an annual action plan that is approved every year and reported on at the end of each year.

The opinions of the ASHE Accreditation Council are subject to decision by the Ministry for Science and Higher Education. The expert team did a thorough investigation of the formal outcomes and did

not evidence any cases where the final decision by the ministry would differ from the one suggested by the Accreditation Council.

Also, both from the documentation and responses during the site visit there was no indication that the opinion of the Accreditation Council would be affected by any third parties. The panel finds this important, and crucial to maintain.

Panel commendations

The working relationship between ASHE and the Ministry for Science and Higher Education is collegial and professional thus ensuring that the quality assurance agenda can be executed successfully.

Panel suggestions for further improvement

The panel proposes that ASHE explores the possibility of being delegated the final formal decision-making power on the outcome of accreditation procedures to strengthen its autonomy.

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

ASHE states in the SAR that it regularly prepares different types of thematic analyses according to the annual plan of assessments as well as the analyses of evaluation procedures at the end of each cycle with the aim to contribute to quality improvement. Thematic analyses form the basis for adjustments of evaluation processes and methodologies, launch of new or adjustment of the existing evaluation procedures and system-wide improvements.

ASHE has defined three main types of thematic analysis: thematic analysis on the results of external evaluations, thematic analyses of methodologies, and analyses and reports of various activities. As the ESG 3.4. specifically requests the analysis of the general findings of the external quality assurance activities, the panel explored the first type of analyses in detail. Between 2017 and 2021 ASHE has produced four such analyses:

- Analysis of re-accreditation of higher education institutions in the field of technical sciences
- Analysis of re-accreditation of higher education institutions in the field of economics
- Analysis of re-accreditation of higher education institutions in the field of biotechnical sciences
- Overview of re-accreditation of doctoral studies in the Republic of Croatia.

These analyses can be found on the ASHE website among a number of other publications covering various aspects of higher education and science.

The review panel was provided with a plan for the upcoming thematic analysis. The plan lists several reports on the re-accreditation of higher education institutions in different scientific fields (biotechnology, social sciences and humanities etc.), an overall report on the second re-accreditation cycle of higher education institutions, an impact study as well as a report on the re-accredited professional higher education institutions and a report on the second audit cycle.

Analysis

The thematic analyses produced by ASHE provide an up-to-date overview of higher education institutions, covering the outcomes of assessment procedures and linking them with the related shortcomings and recommendations.

It is evident that the kind of analyses referred to in standard 3.4, that describe and analyse the general findings of the external quality assurance activities, are performed regularly and that the plan of analyses follows the plan of the evaluation procedures, for example, after completion of the re-accreditation of higher education institutions in the field of biotechnology a related thematic analysis is foreseen. Based on the discussions with the ASHE staff and stakeholders the review panel can conclude that the results of analyses are communicated to the wider society and are used for further developments of the quality assurance processes.

The review panel would like to draw attention to the fact that on the ASHE website in the section “Publications” ASHE lists a number of publications, covering a wide range of issues related to higher education, science and quality assurance. For an external reader that is looking specifically for thematic analyses as defined in the ESG, the current presentation and wider use of the term, may be confusing. It is therefore advised to separate analyses referred to in the ESG from the other ones both on the Croatian and English versions of the website.

Panel commendations

The thematic analyses are effectively incorporated in the overall planning of evaluation cycles and ASHE ensures that every cluster and/or cycle of assessment procedures is carefully analysed.

Panel suggestions for further improvement

The panel encourages ASHE to restructure the section “Publications” on the ASHE website and separating the different types of publications might improve the usability of the website.

Panel conclusion: fully compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2017 review recommendation

The panel suggests ASHE 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.

The panel recommends ASHE, in particular also in the view of the increase in the number of accreditation procedures and to reflect on the workload it will entail for the present staff structure, and to take action if necessary.

Evidence

In its Quality Policy ASHE refers to employees and their expertise as its greatest asset. The number of ASHE staff members has been stable – 72 in 2021 compared to 71 in 2017. While the number of employees is stable, the number of tasks assigned to the agency not related to external quality assurance has increased over the years

According to the SAR, 20 employees are assigned to tasks related to external quality assurance of higher education and in their work are supported by colleagues from other departments. 18 of these staff members are employed directly by the Directorate for Higher Education. The number of employees directly responsible for external quality assurance has remained stable compared with 2017 when the number reported in the SAR was also 20. As a part of additional information, the review panel requested short profiles of all ASHE staff members working on the processes that are subject to this review and ASHE provided profiles of 25 staff members. The discrepancy of numbers is caused by the fact that the staff members working on external quality assurance activities come from different departments, some being involved directly and others indirectly. For example, one of the reported colleagues is the Head of Department for International Cooperation.

As a public institution ASHE is subjected to the national employment policy for the public sector. The staff number in the public sector is fixed and ASHE is allowed to recruit a new staff member only when one of the current staff members leaves. In the SAR, ASHE also reports that the salaries in ASHE are lower than in the private sector therefore one of the challenges of ASHE is to recruit and retain qualified employees. The data requested by the review panel on the staff turnover show that in the period from 2017 to 2021 8 staff members left ASHE and 9 new members were recruited. There has been a slow but constant move of staff members to the Ministry of Education and Science which is seen as a benefit for ASHE because it improves the competency of the ministry staff in the ASHE related issues.

The financial resources to ASHE are allocated from the state budget. The state budget is developed for a 3-year period and allocated on an annual basis. ASHE has an autonomy to allocate the funding internally, within the amount allocated to it.

ASHE has also successfully attracted EU funds for ensuring additional funding for developmental activities, for example, further development of the MOZVAG2 system. A slight decrease in the overall budget is foreseen in 2022 due to completion of the current ESF project (SKAZVO). Recently, ASHE has started providing quality assurance services internationally, as an additional source of funding. The overall budget has been stable over the last few years.

ASHE operates in an office building located in the central part of Zagreb. The building is shared by ASHE and the Ministry of Science and Education. The visit took place in an on-line mode therefore the review panel could not visit the premises. However, the SAR outlines the need for more office space in the near future and lists inadequate space conditions considering the size of the premises as one of the weaknesses.

ASHE has implemented a number of information systems for data collection. Some of them are used at the national level, while others only internally. ASHE has developed MOZVAG and MOZVAG2 systems for gathering data on higher education institutions. MOZVAG2 was intended specifically for the second cycle of re-accreditation of higher education institutions. ASHE also makes use of the Croatian Scientific Bibliography (CROSBI) and Database of Project Activities in Science and Higher Education in Croatia (Project Database). The assessment procedures are managed with the support of the Central Evidence Procedures (CEP) database. Currently there is no one comprehensive information system that would be suitable for all ASHE needs.

Analysis

ASHE is a key stakeholder in the higher education sector in Croatia, and this is reflected in the size and portfolio of the organisation.

The number of staff members both in ASHE as a whole and in external quality assurance activities has remained stable since 2017. In the same period, the volume of external quality assurance activities has also remained stable.

The recommendation from 2017 suggested to assign more resources to the audit procedure and also to reflect on the overall workload of the staff members in light of the increasing number of assessment procedures. As a response to this recommendation, ASHE has hired two new staff members – one in the Audit Department and another one in the Department of Analytics and Statistics.

The financial situation of ASHE has remained stable over the last years and the ASHE management and ministry representatives confirmed their commitment to keep the budget stable. It was also noted by the ministry that in light of the increase of ASHE portfolio the budget and other resources have to be reviewed.

ASHE operates a number of databases with the purpose to obtain information for external quality assurance activities and also to ensure their management internally. There is a designated unit for providing IT support and another one for analytics and statistics. While the review panel commends the use of databases, it is important that they are fit for purpose and do not place a disproportionate burden on those involved. The panel was informed about ASHE's intention to design an improved IT system that would support all its needs. In parallel, a long-term goal of setting up a national database for higher education and research was brought up by some interviewees. Considering that some of the interviewed HEI representatives expressed concerns over the complexity of the systems that have to be used by the HEIs, these developments require further attention.

Given that the mandate of ASHE in regard to higher education and science is still expanding, it is crucial to ensure that the available resources are sufficient for executing all tasks in a qualitative manner.

Panel commendations

The review panel commends the dedication, availability and professionalism of the ASHE management and staff members in support of the external quality assurance processes highlighted by the stakeholders.

Panel suggestions for further improvement

The panel encourages ASHE to continue, in collaboration with other stakeholders maintaining national databases used in quality assurance processes, its efforts to review the number of databases used to ensure that they effectively support the needs of ASHE and can be maintained with minimal resources.

Panel conclusion: fully compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Evidence

ASHE's internal quality assurance system was established in 2006. It was developed to be in line with the legal framework, the ESG and later revised to comply with the requirements of ISO 9001:2015 standard and the ESG 2015.

The quality assurance system of ASHE consists of the quality policy, strategy defined for the period of 5 years, quality manual and a number of relevant documents that regulate the ASHE processes in detail, for example, procedures, work instructions, reports etc. The Quality Policy is published on the ASHE website.

According to the Quality Policy, ASHE applies the "Plan-Do-Check-Act" (PDCA) cycle and continuously revises its processes with the aim to improve. The goals of the Quality Policy are aligned with the ASHE mission and strategic orientation and focus on preserving and improving the relevance of external quality assurance in line with social trends and strengthening the social role of ASHE as a promoter of the quality of higher education and science.

Every year the internal auditors carry out an internal audit resulting in a Management Assessment Report. This report is available to all employees and constitutes the basis for the next cycle of improvements. ASHE is also subject to an external audit carried out every year.

ASHE makes use of several surveys for collecting feedback from internal and external stakeholders. An employee satisfaction survey is conducted once a year. After conclusion of each assessment procedure, the evaluated higher education institutions and members of the expert panels are surveyed. There is also an annual survey for all ASHE stakeholders on their satisfaction with ASHE work. The results of the 2020 and 2021 surveys were presented to the review panel.

In addition to these surveys, ASHE organises meetings for collecting feedback and reviewing the methodologies for different assessment procedures. It takes place after each cycle of assessments and is linked with the feedback from higher education institutions and expert panels as well as with the results of thematic analysis of the respective assessment cycle.

Employees and members of collegial bodies in ASHE are required to conform to high ethical and professional standards which are described in different regulations and rules of procedures, for example, the Rules of Procedure of the Accreditation Council, the Rules of Procedure of the Complaints Committee etc. They are asked to sign a Statement on confidentiality and conflict of interest prior to engaging in any such activity of the agency.

ASHE states that its employees and their expertise is its greatest asset. There is an employee competence profile in place for all positions. It is used for recruitment, monitoring of achievements, career development and motivating through continuous learning.

ASHE has implemented the General Data Protection Regulation (GDPR) in order to allow the data subjects to regulate the use of their personal data. A related Privacy Policy has also been adopted.

Analysis

The review panel found that ASHE's internal quality assurance system is clearly defined and documented. From the documentation and during the interviews the panel obtained evidence that the feedback loop is functioning well, and that ASHE values the input from its stakeholders. Both from the documentation and during the interviews the review panel received confirmation that feedback is collected and addressed, for example, amendments to the guidelines are made after completing each assessment cycle and while preparing for the next one.

The employees and collaborators of ASHE (experts, members of committees etc.) are subject to clear procedures that guarantee their integrity and ethical behaviour when performing the ASHE duties.

The review panel noticed that the feedback collected from all parties has remained positive over the last years with very minor changes. After the analysis of feedback from stakeholders the review panel came to a conclusion that, while the continuous excellent feedback is a sign of stability, it could also indicate that the survey mechanisms are no more fit for purpose and therefore might no longer yield results that are useful for further improvement. It would therefore be advisable that the survey mechanisms are reviewed or at least diversified and new mechanisms are introduced alongside the surveys (e.g. focus groups).

Panel commendations

The internal quality assurance system in ASHE is clearly designed and rigorously implemented thus serving as an example to the higher education institutions that ASHE works with.

Panel suggestions for further improvement

The panel proposes that ASHE considers diversifying the feedback mechanisms in order to achieve more qualitative and complex feedback that would better facilitate further improvement.

Panel conclusion: fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

ASHE has been a member of ENQA and also listed on EQAR since 2011. Since then, ASHE has undergone its second review against the ESG in 2017 and is currently undergoing its third review. ASHE has demonstrated its commitment to comply with ESG both through the constant updates of the external quality assurance procedures and through addressing all recommendations formulated by the previous review panels.

Further, ASHE is recognised as an active member of ENQA thus clearly demonstrating its commitment to follow and comply with the developments in external quality assurance. It is regularly represented in the statutory events and contributes to the organisational developments and policy initiatives of ENQA.

Analysis

Based on the evidence provided for this review and the publicly available information, the review panel concludes that ASHE fulfils the requirements set by this standard and has clearly demonstrated its commitment in doing so in future.

The review panel would like to highlight the ASHE methodological approach in addressing the recommendations formulated by the 2017 review panel and to commend the progress visible from triangulation between the 2017 expert report, the ASHE follow-up report from 2018 and the SER from 2021.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

2017 review recommendations

The panel recommends ASHE, 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 into account the specific qualitative features in ESG Part I mentioned above.

The panel recommends 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.

Evidence

Within this review the panel is assessing five activities performed by ASHE: initial accreditation of study programmes and higher education institutions, re-accreditation of higher education institutions, re-accreditation of PhD study programmes, audit of higher education institutions, and thematic evaluations.

As mentioned in the introductory part of this report, the review panel has made a differentiation between the first four activities (initial accreditation of study programmes and higher education institutions, re-accreditation of higher education institutions, re-accreditation of PhD study programmes, audit of higher education institutions) and thematic evaluations.

This is due to the fact that the information on thematic evaluations presented in SAR and on ASHE website clearly demonstrates that this activity has not been designed to cover all elements of the ESG Part I. It is rather a complementary activity that could form the basis for development of new comprehensive quality assurance activities. This has been the case before when on the basis of thematic evaluation conducted in 2014 the re-accreditation of PhD study programmes was conducted from 2017 to 2021. The SAR states that for each thematic evaluation, in accordance with the specific goal of it, specific procedure and corresponding standards would be adopted.

Further, the latest thematic analysis was conducted in 2017. Although ASHE has not stated that it would not perform such evaluations in the future, the strategic documents provided do not indicate such plans in the current planning period (2021 – 2025).

The initial accreditations of study programmes and higher education institutions aim to assess whether a new higher education institution and a study programme meet the necessary quality standards. The initial accreditation applies to all new study programmes proposed by private higher education institutions and public polytechnics and colleges, not to study programmes delivered by public universities. In case the higher education institution is new, the institution itself and the programme proposed are both assessed at the same time therefore the assessment standards are focused on the programme level and defined by the Standards for the evaluation of quality of study programmes in the procedure of initial accreditation.

The mapping against the ESG Part I provided by ASHE refers to initial accreditation overall, not providing differentiation between the initial accreditation of study programmes and the higher education institutions. However, the ASHE website still describes two separate procedures “Initial accreditation of study programmes” and “Initial accreditation of higher education institutions” and the links to evaluation outcomes posted under “Initial accreditation of higher education” do not work.

All higher education institutions in Croatia are subject to re-accreditation of higher education institutions and undergo it every 5 years. The re-accreditation of higher education institutions takes place according to the Standards for the evaluation of quality of universities and university constituents in the procedure of re-accreditation of higher education institutions and Standards for the evaluation of quality of polytechnics and colleges in the procedure of re-accreditation of higher education institutions. These standards have been developed by ASHE, approved by the ASHE Accreditation Council and are published on the ASHE website. The re-accreditation of higher education institutions is designed to cover in detail all standards of the ESG Part I.

The audit procedure, on the other hand, is intended to look at the overall internal quality assurance system of a higher education institution and is also carried out in 5-year cycles. The audit takes place according to the Audit Criteria, also published on the ASHE website. The first cycle of audits (2010 - 2016) covered polytechnics and public universities. The second cycle started in 2018 and covers colleges and other higher education institutions that express the wish to undergo the procedure.

As for the re-accreditation of PhD study programmes, it was part of a larger activity “Re-accreditation of the Part of the Activities of Higher Education Institutions”. PhD study programmes were chosen to be subject of the one-off exercise that took place between 2016 and 2019. A specific assessment methodology “Reaccreditation of postgraduate university study programmes in Croatia: principles and criteria” was designed and is published on the ASHE website. During the site visit the review panel did not learn of any plans to repeat this activity.

According to the Terms of Reference and the information provided during the visit, thematic evaluations is an ad-hoc activity and no exercise of this kind has taken place during the last 5 years.

In the SAR, ASHE has provided a mapping of four activities against the ESG Part I (see table I).

The audit of higher education institutions has been mapped against the whole ESG Part I by ASHE on purpose, without specifying separate standards, as it looks at procedural aspects of implementing all standards rather than on the essence of these standards.

The mapping grid does not separate re-accreditation of higher education institutions and audit of higher education institutions in Croatia and abroad as these procedures are performed according to the same methodology. This is confirmed by the structure and content of expert reports published on the ASHE website.

Since the last review in 2017, ASHE has reviewed re-accreditation of higher education institutions and initial accreditation of study programmes with the aim to ensure better compliance with the ESG Part I. In the follow-up report on 2017 recommendations ASHE states that a major change had been emphasising the qualitative aspect while checking the minimal legal conditions (which are quantitative) within the standards, together with other indicators of quality.

As a response to the recommendation on the follow up to SKAZVO project where the new criteria for accreditation were developed, ASHE has performed analysis on the pilots of the new re-accreditation cycle as a part of the thematic analysis of higher education institutions in different fields.

Table I

ESG standard	Re-accreditation of HEI	Initial accreditation of study programmes and HEI	Re-accreditation of doctoral studies	Audit of HEI (<i>this procedure has been mapped against the whole ESG Part I, without specifying certain standards</i>)
<p>1.1. Policy for quality assurance</p>	<p>1.1. The higher education institution has established a functional internal quality assurance system. 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations. 1.3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behaviour, intolerance and discrimination.</p>	<p>2.2. The study programme underwent an adequate internal quality assurance process and was formally approved by the HEI, and its continuous improvement is planned.</p>	<p>2.1. The HEI has established and accepted effective procedures for proposing, approving and delivering doctoral education. The procedures include identification of scientific/ artistic, cultural, social and economic needs. 2.5. HEI assures academic integrity and freedom.</p>	<p>Elements of evaluation in audit: 1. Quality Policy 2. Planning and management 3. Implementation and monitoring 4. Evaluation 5. Improvements, innovations, impact.</p> <p>The elements of evaluation represent a quality assurance cycle (a variation of Deming Cycle) used to assess whether HEI follows a process approach to quality assurance, in accordance with the ESG. These elements explicitly refer to and assess all ESG standards (1.1-1-10).</p> <p>Namely:</p> <p>1. Quality Policy:</p>

<p>1.2.Design and approval of programmes</p>	<p>2.1. The general objectives of study programmes are in line with the mission and strategic goals of the higher education institution and the needs of the society.</p> <p>2.2. The intended learning outcomes at the level of study programmes delivered by the higher education institution are aligned with the level and profile of qualifications gained.</p> <p>2.6. Student practice is an integral part of study programmes (where applicable).</p>	<p>1.1. The intended learning outcomes of the study programme are clear and transparent, and aligned with the mission and strategic goals of higher education institutions.</p> <p>1.2. The intended learning outcomes achieved in the study programme align with the Croatian Qualifications Frameworks and the European Qualifications Framework level descriptors.</p> <p>1.3. Intended learning outcomes are aligned with the competencies a student should gain by completing the study programme.</p> <p>1.4. Intended learning outcomes of the course are aligned with the intended learning outcomes of the study programme.</p> <p>2.1. The study programme justification was provided with regard to social and economic needs, which is also reflected in the enrolment quota.</p> <p>2.3. The content of the curriculum is coherent and enables the students to achieve the intended learning outcomes and to progress smoothly through their studies.</p> <p>2.4. The study programme curriculum is scientifically/professionally founded and comparable to similar study programmes abroad.</p>	<p>2.2. The doctoral study programme is aligned with the HEI research mission and vision, i.e. research strategy.</p> <p>4.1. The content and quality of the doctoral programme are aligned with internationally recognized standards.</p> <p>4.2. Programme learning outcomes, as well as the learning outcomes within it, are aligned with the level 8.2 of the CROQF. They clearly describe the competencies the candidates will develop during the doctoral programme, including the ethical requirements of doing research.</p> <p>4.3. Programme learning outcomes are logically and clearly connected with teaching contents, as well as the contents included in supervision and research.</p> <p>4.4. The doctoral programme ensures the achievement of learning outcomes and competencies aligned with the level 8.2 of the CROQF.</p> <p>4.5. Teaching methods (and ECTS allocation, if applicable) are appropriate for level 8.2 of the CROQF and ensure the achievement of clearly defined learning outcomes.</p> <p>4.6. The programme enables acquisition of general (transferable) skills.</p>	<p>Basic documents in which HEI defines its responsibilities and obligations by individual ESG standards; e.g. statements, policies, strategies, etc.</p> <p>2. Planning and management: Plans: operational, action, programme, teaching, financial, plans for development of material and human resources, plans of internal and external evaluations, other plans at all organisational levels, which - in accordance with policies and strategic direction (element 1) - set goals by each ESG standard.</p> <p>3. Implementation and monitoring: Reports on the implementation of action plans (element 2); other evidence of the quality of implementation/monitoring of planned activities by individual ESG standards and indicators.</p> <p>4. Evaluation: Internal and external evaluation reports, analyses, other evidence of internal evaluations of implemented processes (element 3); (e.g. performance analyses, analyses of implemented action plans, etc.)</p> <p>5. Improvements, innovations, impact: Examples of</p>
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<p>1.3.Student-centred learning, teaching and assessment</p>	<p>2.3. The higher education institution provides evidence of the achievement of intended learning outcomes of the study programmes it delivers.</p> <p>3.3. The higher education institution ensures student-centred learning.</p> <p>3.4. The higher education institution ensures an objective and consistent evaluation and assessment of student achievements.</p>	<p>3.2. The planned teaching methods ensure student-centred learning and achievement of all intended learning outcomes.</p> <p>3.3. The higher education institution proves that adequate support for future students is ensured.</p> <p>3.4. An objective and consistent assessment and grading of student achievements is planned in order to ensure acquisition of intended learning outcomes.</p>	<p>3.4. The HEI should pay attention to the number of candidates admitted as to provide each with an advisor (a potential supervisor). From the point of admission to the end of doctoral education, efforts are invested so that each candidate has a sustainable research plan and is able to complete doctoral research successfully.</p> <p>4.7. Teaching content is adapted to the needs of current and future research and candidates' training (individual course plans, generic skills etc.).</p>	

<p>I.4. Student admission, progression, recognition and certification</p>	<p>3.1. Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied.</p> <p>3.5. The higher education institution issues students diplomas and Diploma Supplements in accordance with the relevant regulations.</p>	<p>3.1. The admission requirements are clearly defined and transparent, and ensure that students have adequate prior knowledge.</p>	<p>2.6. The process of developing and defending the thesis proposal is transparent and objective, and includes a public presentation.</p> <p>2.7. Thesis assessment results from a scientifically sound assessment of an independent committee.</p> <p>3.6. The selection process is public and based on choosing the best applicants.</p> <p>3.7. The HEI ensures that the selection procedure is transparent and in line with published criteria, and that there is a transparent complaints procedure.</p> <p>3.8. There is a possibility to recognize applicants' and candidates' prior learning.</p> <p>4.8. The programme ensures quality through international connections and teacher and candidate mobility.</p>	
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<p>I.5. Teaching staff</p>	<p>4.1. The higher education institution ensures adequate teaching capacities.</p> <p>4.2. Teacher recruitment, advancement and re-appointment is based on objective and transparent procedures, which include the evaluation of excellence.</p> <p>4.3. The higher education institution provides support to teachers in their professional development.</p> <p>5.1. Teachers and associates employed at the higher education institution are committed to the achievement of high quality and quantity of scientific research.</p> <p>5.5. Scientific, artistic and professional activities and achievements of the higher education institution improve the teaching process.</p>	<p>4.1. The teaching staff is sufficient and adequate to implement the study programme and ensure achievement of the intended learning outcomes.</p> <p>4.2. Qualifications and work experience of external associates is appropriate for the delivery of the study programme and the achievement of intended learning outcomes.</p>	<p>1.2. The number and workload of teachers involved in the study programme ensure quality doctoral education.</p> <p>1.3. The teachers are highly qualified researchers who actively engage with the topics they teach, providing a quality doctoral programme.</p> <p>1.4. The number of supervisors and their qualifications provide for quality in producing the doctoral thesis.</p> <p>1.5. The HEI has developed methods of assessing the qualifications and competencies of teachers and supervisors.</p> <p>2.3. HEI systematically monitors the success of the programmes through periodic reviews, and implements improvements.</p> <p>2.4. HEI continuously monitors supervisors' performance, has mechanisms for evaluating supervisors, and, if necessary, replacing them, and for mediating between the supervisors and the doctoral candidates.</p> <p>3.1. HEI establishes admission quotas with respect to its teaching and supervision capacities.</p> <p>4.8. The programme ensures quality through international connections</p>	
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			and teacher and candidate mobility.	
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<p>1.6.Learning resources and student support</p>	<p>3.4. The higher education institution ensures adequate student support.</p> <p>3.5. The higher education institution ensures support to students from vulnerable and under- represented groups.</p> <p>3.6. The higher education institution allows students to gain international experience.</p> <p>3.7. The higher education institution ensures adequate study conditions for foreign students.</p> <p>3.10. The higher education institution is responsible for the employability of graduates.</p> <p>4.4. The space, equipment and the entire infrastructure are appropriate for the delivery of study programmes, ensuring the achievement of the intended learning outcomes and the implementation of scientific/artistic and professional activity.</p> <p>4.5. The library and library equipment, including the access to additional resources, ensure the availability of literature and other resources necessary for high-quality study and scientific-teaching/artistic teaching activity.</p>	<p>3.3. The higher education institution proves that adequate support for future students is ensured.</p> <p>4.3. The space, equipment and the entire infrastructure (classrooms, laboratories, the library, etc.) are appropriate for the delivery of the study programme and ensure the achievement of the intended learning outcomes.</p> <p>4.4. The library and library equipment, including access to additional resources, ensure the availability of literature and other resources necessary for a high quality of study as well as of research and/or teaching activity.</p> <p>4.5. The higher education institution ensures the necessary funds for the organization of work and high-quality delivery of the study programme.</p>	<p>1.6. The HEI has access to high-quality resources for research, as required by the programme discipline.</p> <p>3.9. Candidates' rights and obligations are defined in relevant HEI regulations and a contract on studying that provides for a high level of supervisory and institutional support to the candidates.</p> <p>3.10. There are institutional support mechanisms for candidates' successful progression.</p>	
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	4.6. The higher education institution rationally manages its financial resources.			
I.7.Information management	3.2. The higher education institution gathers and analyses information on student progress and uses it to ensure the continuity and completion of study.	2.1. The study programme justification was provided with regard to social and economic needs, which is also reflected in the enrolment quota.	2.3. The HEI systematically monitors the success of the programmes through periodic reviews, and implements improvements. 2.4. HEI continuously monitors supervisors' performance and has mechanisms for evaluating supervisors, and, if necessary, changing them and mediating between the supervisors and the candidates.	
I.8.Public information	1.4. The higher education institution ensures the availability of information on important aspects of its activities.	1.1. The intended learning outcomes of the study programme are clear and transparent, and aligned with the mission and strategic goals of higher education institutions.	2.8. The HEI publishes all necessary information on the study programme, admissions, delivery and conditions for progression and completion, in accessible outlets and media.	

<p>1.9. On-going monitoring and periodic review of programmes</p>	<p>2.4. The HEI uses feedback from students, employers, professional organisations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes. 2.5. The higher education institution ensures that ECTS allocation is adequate.</p>	<p>2.2. The study programme underwent an adequate internal quality assurance process and was formally approved by the HEI, and its continuous improvement is planned.</p>	<p>2.3. The HEI systematically monitors the success of the programmes through periodic reviews, and implements improvements.</p>	
<p>1.10. Cyclical external quality assurance</p>	<p>1.1. The higher education institution has established a functional internal quality assurance system. 1.2. The higher education institution implements recommendations for quality improvement from previous evaluations.</p>			

Analysis

It is evident from the table above that ASHE has taken into account the ESG Part I when designing its methodologies. The methodologies for re-accreditation of higher education institutions, re-accreditation of doctoral studies and initial accreditation of study programmes and higher education institutions have been closely aligned with the ESG Part I and all standards have been covered. The standard I.10 has not been covered by the re-accreditation of doctoral study programmes and initial accreditation of study programmes and higher education institutions as these assessment procedures are not cyclical by their nature.

Since the last review in 2017 significant improvements to the methodologies have taken place. The methodologies have been revised to better align them with the ESG and to balance the quantitative and qualitative elements, especially for the initial accreditation. Special attention has been paid to covering the aspects related to Croatian Qualifications Framework (CROQF) in line with the ESG standard I.2. The standard I.2 now covers the aspects of CROQF in a general way as the qualification standards are still under development.

With respect to ESG I.4, the elements of recognition are covered by the admission process and the standards related to it, as indicated in the methodology for initial accreditation of study programmes and higher education institutions, re-accreditation of higher education institutions and re-accreditation of PhD study programmes and in the methodology for audit of higher education institutions.

For example, the standard 3.1 for re-accreditation of higher education institutions requires to demonstrate:

- defined recognition procedures and the examples of recognition of Croatian and foreign higher education qualifications, periods of study and prior learning in the case of continuation of studies,
- cooperation with the University Office for Academic Recognition of Foreign Higher Education Qualifications and the Croatian ENIC/NARIC Office of the Agency for Science and Higher Education
- feedback from students who have transferred from other higher education institutions with regard to their experience with recognition of
- higher education qualifications, periods of study and prior learning in case of continuation of studies (interviews, surveys).

The audit methodology clearly reflects its aim to focus on the internal quality assurance system of the higher education institutions and supporting the development of quality culture therefore it does not cover separate standards of the ESG Part I. It looks at procedural aspects of quality assurance, namely, how the quality assurance cycle is implemented in all activities foreseen by the ESG Part I, without defining specific standards for each standard of the ESG Part I. This is reflected in the mapping grid included above, where the methodology has been presented as covering the whole ESG Part I rather than separate standards. Considering that the audit is always carried out in addition to the other mandatory procedures, such as (re-)accreditation of higher education institutions, , the review panel considers that the overall ESG Part I coverage of this procedure is sufficient for achieving the aim defined for this procedure.

Panel commendations

ASHE has performed systematic work to further align the methodologies with the ESG Part I since 2017.

Panel suggestions for further improvement

The panel encourages ASHE to follow closely the developments related to the CROQF and ensure that the initial accreditation procedure investigates compliance with the academic and occupational qualification standards when those are available.

The panel suggests ASHE aligns the information on initial accreditation of study programmes and higher education institutions published on the ASHE website to clearly demonstrate the relation of both activities and avoid duplication.

Panel conclusion: fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2017 review recommendations

The panel recommends ASHE 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.

The panel recommends considering 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 programmes by internal quality assurance systems at higher education institutions.

The panel recommends ASHE 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 processes in order to avoid overlap, to foster the quality culture and to help improve Institutional internal quality assurance processes.

The panel strongly recommends ASHE 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.

Evidence

The external quality assurance processes implemented by ASHE are designed on the basis of the Law on Quality Assurance and several ordinances.

Based on these regulations ASHE has designed a methodology for each assessment procedure and involved stakeholders both in development and review of the methodologies. Stakeholder feedback has been collected through surveys for the reviewed institutions and experts and through meetings with the relevant stakeholder bodies, for example, Croatian Rectors' Conference, Croatian Council of Polytechnics and Colleges. A public review of all proposed procedures and related documents takes place.

All external evaluation processes have been designed in line with the ASHE mission - to encourage the development of the Croatian higher education system. In terms of thematic evaluations, methodology is developed separately for each exercise, depending on its nature. The information provided on the ASHE website provides a clear aim and objective for each of the thematic evaluations. Moreover, the last thematic evaluation in 2014 resulted in a comprehensive evaluation exercise (re-accreditation of PhD study programmes).

All ASHE procedures, except the thematic evaluation, include a follow-up stage where the institutions are reporting on the implementation of recommendations and these reports are considered by the ASHE Follow-up Committee. Since 2017 the follow-up stage has been added to the initial accreditation as well.

In the past ASHE used the same methodology for the reviews abroad (Slovenia and Bosnia and Herzegovina) as for the national higher education institutions. This was possible because the reviews were performed at the institutional level. In 2021 ASHE started carrying out assessments of study programmes abroad (in Ukraine) and evaluations of joint programmes in accordance with the European Approach for Quality Assurance of Joint Programmes. From the information provided in the SAR, ASHE website and during the site visit, the review panel concludes that these are full-fledged, newly developed activities and ASHE plans to offer them in the future. At the time of the site visit no such exercises had been completed but the review panel analysed the standards for these first assessments.

The panel also learned from the ASHE website that ASHE offers to carry out external evaluation of agencies for quality assurance in higher education aimed at renewing their EQAR registration. Again, at the time of the site visit no such activities were completed but the website clearly indicates that there is an intention to offer this activity in the future and the assessment would be done against the ESG.

The panel learned that these activities have been designed following an external request but no national stakeholders have been involved in their design.

In 2017 ASHE received a number of recommendations. In response to these recommendations, there have been several changes to the legislation that provides a basis for ASHE's work. As the review of doctoral programmes was completed in 2019 and there have not been plans to repeat it, the recommendation on the merger of the two procedures covering the doctoral education is not relevant anymore. In regard to the recommendation on guaranteeing the self-accreditation rights to the higher education institutions that have demonstrated the quality of their internal quality assurance systems, such rights have currently been granted to public institutions and other possibilities are considered with the new legislation.

With the current audit cycle the previous overlaps with the re-accreditation procedure have been eliminated - the audit procedure focuses on Plan-Do-Check-Act cycle. It does not end with formal outcome but a certificate and/or recommendations for improvement and additional emphasis is placed on an informed peer assessment and "appreciative approach", i.e. the assessment of efficiency rather than the validity of a chosen model of internal quality assurance.

The non-existent link with the CROQF framework highlighted by the 2017 review panel has been taken into account in the accreditation procedure, to the extent that the development stage of the CROQF allows.

The review panel also learned that on 15 September 2020 the Accreditation Council adopted the Decision on the implementation of external evaluation procedures during COVID-19 (SARS-CoV-2) pandemic. This decision states that ASHE shall conduct external quality assurance procedures in the regular manner, as long as the epidemiological circumstances allow it. ASHE shall individually assess

each case and the Accreditation Council shall take the decision on whether the conditions for regular implementation are met. In case the conditions are not met, a mixed (hybrid) model would be applied. The mixed (hybrid) model developed by ASHE foresees that there is expert training conducted fully online, a preliminary site visit that is carried out in the regular (on-site) way and the main site visit that is carried out via video link (online). The preliminary site visit has to be attended in person by national experts and, if the epidemiological circumstances allow, international experts. The decision also defines the obligations and responsibilities of the higher education institutions and ASHE in ensuring consistent implementation of external quality assurance procedures in a hybrid mode.

Analysis

The methodologies used by ASHE in Croatia have been developed in close cooperation with stakeholders. The feedback from stakeholders has been collected through surveys and focus groups on a regular basis and analysed with the aim to improve the methodologies for the upcoming evaluation cycles.

During the visit the fact that the methodologies are tailored to the specifics of the Croatian higher education system was mentioned as one of the major reasons why there is a risk in allowing other EQAR registered agencies to operate in Croatia. The review panel learned that the higher education institutions appreciate the services provided by ASHE very much and a number of institutions confirmed that the methodologies are precise and clear and even the negative decisions have been deemed justified.

The 2017 review panel found that the various external quality assurance processes put considerable burden on the higher education institutions and suggested that several mergers or further alignments could be made. The suggested merger that is related to the re-accreditation of doctoral study programmes has not been relevant as the procedure itself is completed and will not be continued.

In regard to the overlap between the re-accreditation of higher education institutions and the audit several improvements have been made since 2017. The second cycle of audits takes place according to a reviewed methodology where the previously identified overlaps have been removed. From the mapping provided under the ESG 2.1 it is evident that the audit procedure focuses on the overall internal quality assurance system rather than on specific elements of the educational process as defined by the ESG Part I. By the end of the current cycle of re-accreditations, all institutions will have repeated this exercise twice. As both the re-accreditation and audits of higher education institutions have a cycle of 5 years, the review panel questions the relevance of the audit procedure beyond the current cycle. The review panel would therefore encourage ASHE to think about the long-term perspective of the re-accreditation and audit to ensure that the burden caused to the higher education institutions is proportionate to the value that they gain.

The 2017 review panel was also concerned about the implementation of CROQF and its relation to ASHE evaluation procedures. ASHE has incorporated in the new models of re-accreditation of higher education institutions and initial accreditation of study programmes all elements of the CROQF that are currently available. Other changes in the ASHE methodologies are still dependent on changes in the national legislation.

The panel also learned about the cross-border assessments that ASHE is conducting and plans to conduct in the future. Two of these assessments (evaluation of joint programmes in accordance with the European Approach for Quality Assurance of Joint Programmes and external evaluation of agencies for quality assurance in higher education aimed at renewing their EQAR registration) follow a generally accepted international methodology. However, the accreditation of study programmes is a new assessment fully developed by ASHE and the fitness for purpose of this methodology has to be assessed in the future.

The panel appreciates ASHE's decision that aims to ensure smooth and consistent implementation of external quality assurance procedures during the COVID-19 pandemic. The panel notes that incorporating online working into external quality assurance processes has become standard practice among the quality assurance agencies and is satisfied that ASHE's arrangements ensure that the aims and objectives set for each assessment are met.

Panel conclusion: fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

2017 review recommendations

The panel recommends ASHE to look at the over-burdening effects to be witnessed in its Re-accreditation Procedures, and it encourages the Agency, when possible, to extend the site-visit 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 HEIs to provide more evidence before the site visit.

The panel recommends ASHE to consider the inclusion of a follow-up procedure in the Initial Accreditation of study programmes and Higher Education Institutions, thus allowing applicants to remedy any shortcomings of minor significance.

Evidence

All ASHE's external quality assurance processes take place according to a defined methodology that is published on the ASHE website.

The general model that is applied in the initial accreditation of study programmes and higher education institutions, re-accreditation of higher education institutions, audit of higher education institutions and re-accreditation of PhD study programmes is the following:

- self-evaluation report;
- site-visit to the higher education institution;
- joint report by the expert team;
- consideration by the Accreditation Council and the issue of a recommendation (official statement on the proposed decision) or a certificate in case of audit;
- follow-up procedure.

The template of the self-evaluation report is part of the methodology for each procedure. The higher education institutions are also offered workshops on specific topics covered by the self-evaluation report and experts are trained on writing the expert report

The length and structure of the site visit depends on the type of the assessment. It takes place always according to a predefined schedule and the consistency and smooth running of the visit is ensured by a designated ASHE staff member (coordinator).

In the new methodology for re-accreditation of higher education institutions the site visit has been extended from 3 days to 5 days allowing the panels to carry out more in-depth analysis.

After the site visit, the report drafted by the expert team is sent to the ASHE coordinator for consistency review. The template of the expert report is also predefined and part of the methodology for the assessment in question. In addition to analysis of compliance with the defined criteria, the expert report lists examples of good practices of each institution and recommendations for improvement.

The Accreditation Council is responsible for issuing a recommendation in case of re-accreditation of higher education institutions, initial accreditation of study programmes and higher education institutions and re-accreditation of doctoral study programmes. In case of audit the Accreditation Council issues the final decision (certificate).

The follow-up procedure has undergone changes since the review in 2017. The follow-up stage has been introduced into all assessments and a separate Follow-up Committee has been established to consider all follow-up reports.

The follow-up procedure generally depends on the accreditation result. If the result is positive, the higher education institution is expected to submit an action plan and report on its implementation within 6 months after the decision (or another period set by the Accreditation Council). If the result is a letter of expectation (the higher education institution is expected to react to some deficiencies), the Accreditation Council fixes a certain follow-up period.

The Follow-up Committee meets on a regular basis and addresses all follow-up reports in order to provide feedback to the higher education institutions and suggest to the Accreditation Council decisions on possible corrective measures.

There have been significant improvements to the follow-up of the audit procedure by reducing the overall length of the procedure. The follow-up stage has been separated from the overall length of the assessment and two checkpoints for assessing the progress have been introduced. First, the higher education institution has to submit a follow-up report six months after the audit. Based on the report the expert panel drafts a conclusion on the effectiveness of the activities carried out during the follow-up phase. After that, a final meeting is organised between the management of the higher education institution, one member of the expert panel and the ASHE coordinator in order to discuss the effectiveness of follow-up activities. Second, in two years after the adoption of the final audit report, the higher education institution submits a report on the implementation of the action plan and presents its experience to peers from other institutions.

As explained under ESG 2.1 and ESG 2.2, a separate methodology is designed for each thematic evaluation. The last thematic evaluation in 2014 consisted of the following stages – adoption of indicators for the evaluation, development of an electronic questionnaire for data entry and sending it to the higher education institutions, receipt and harmonisation of the received data by ASHE, analysis of the information by the desk research team (representatives of the academic community and ASHE staff) and preparation of the report.

Analysis

The review panel concludes that the initial accreditation of study programmes and higher education institutions, re-accreditation of higher education institutions, audit of higher education institutions and

re-accreditation of PhD study programmes follow the external quality assurance steps as defined by the ESG and both recommendations from 2017 have been considered and fully implemented.

The panel learned during the site visit that the overall structure of assessment procedures is communicated and well understood by the higher education institutions and experts. All interviewees confirmed that the structure and steps are clear and consistently implemented in all assessment procedures where they have participated. Also, the expert reports, that the review panel analysed, document clearly all stages of each assessment. The higher education institutions and expert panels rely on ASHE (in particular, the respective ASHE coordinator) in ensuring proper implementation of each assessment procedure. ASHE is trusted and the support of the ASHE coordinator is highly valued.

While the assessment processes are based on pre-defined criteria, ASHE has added an enhancement oriented dimension to them by requesting the expert panels to identify examples of good practice, list advantages and disadvantages and provide recommendations under specific criteria.

The information provided by ASHE also clearly shows the improvements that are made over the time based on the feedback from the stakeholders and the recommendations obtained during the external reviews.

Since 2017 significant developments have been made to the overall methodology for assessments, especially in regard to the follow-up procedure, by establishing a separate Follow-up Committee, ensuring that there is a follow-up in all assessment procedures and reviewing the timelines for submitting the follow-up reports.

The review panel interviewed the members of the Follow-up Committee and representatives of the higher education institutions that have been subject to follow-up procedures. The follow-up stage is often a challenge for quality assurance agencies, as a formal follow-up can put an unproportionate burden on those involved but a meaningful follow-up requires additional resources. The solution chosen by ASHE, however, to establish a separate body in charge of the follow-up, ensures that every follow-up report is considered and the feedback loop between ASHE and the higher education institution is closed.

As for thematic evaluations, the review panel understands the rationale for such activity and is of the opinion that the methodology used was fit for purpose for this specific activity. As explained in the introductory sections of this report, the review panel considers this activity as a desk research exercise that has potential to provide valuable information for further actions. The thematic evaluations that the review panel studied included a stage of collecting data from the higher education institutions according to a pre-defined methodology, analysis of the data by a working group and production of a report that is available publicly. Given the specific nature of this activity, the review panel considers that it is in sufficient compliance with the ESG 2.3 and it does not undermine the ASHE's overall compliance with the ESG 2.3.

Panel commendations

The revision of the follow-up procedures and introduction of a separate Follow-up Committee for considering the follow-up reports has increased the trust towards ASHE processes as enhancement led and development oriented.

Panel conclusion: fully compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2017 review recommendations

The panel recommends ASHE to automatize, if possible, the presence of a representative of society, e.g. a business sector representative, in all its re-accreditation panels.

It is also recommended to organize a training (face to face or virtual) about the national context (due to the high number of international experts involved in the processes) as well as on the interpretation of the criteria for the procedures the experts are expected to apply in the initial and re-accreditation processes.

Evidence

ASHE follows general principles (criteria) defined in the methodology for different assessment procedures when composing the expert panels. These principles are defined for each assessment procedure in a separate document called “procedure”, for example, Procedure of Initial Accreditation of a Study Programme or “manual”, for example, Audit Manual. All procedures and manuals are published on the ASHE website. All expert panels are appointed by the Accreditation Council, which has the right to reject the proposal by providing justification.

The experts are selected from an expert database maintained by ASHE. This database is composed through a public call that is open to academic and student experts and experts from the labour market. In regard to student and labour market experts, ASHE, in addition to the call, contacts the relevant stakeholder organisations or, in case of students, also higher education institutions. All panels, except the ones for initial accreditation of study programmes and higher education institutions, include both Croatian and international experts.

The ASHE expert database consists of more than 1300 reviewers. According to the information presented in the SAR, 54% of the reviewers are national and 46% international. The vast majority of international reviewers come from the United Kingdom, Germany and Slovenia. A large number of reviewers also come from the USA.

The composition of the expert panels is the following:

- for re-accreditation of higher education institutions - five or more experts with four representatives of the academic community, one student expert and the possibility of selecting one labour market expert instead of one academic expert;
- for audit of higher education institutions - five experts with three representatives of the academic community, one student and one representative of the business sector with knowledge and experience in quality assurance processes;
- initial accreditation of study programmes and higher education institutions - three experts, one of whom is a student. One representative of the business sector may be selected instead of one academic expert;
- re-accreditation of doctoral study programmes - one doctoral student and four representatives of the academic community.

The expert panel for a thematic evaluation, in case such assessment would be conducted, would be composed taking into account the specific nature and topic of the evaluation. For the latest thematic evaluation in 2014, the commission that prepared the report consisted of three representatives of the academic and scientific community that were supported by three ASHE staff members.

The composition of an expert panel is tailored to the specific assessment, for example, in the re-accreditation of polytechnics and colleges at least two members who teach at the professional level of studies are included.

ASHE provides training to all experts who take part in assessment procedures either before the specific assessment procedure or in the form of workshops for larger groups of experts. These larger trainings can include presentations and simulation of the assessment procedures. In 2020 ASHE has started online training that has proved to be a valuable tool for the future, especially for the foreign experts.

All panel members are requested to sign the Confidentiality and Non-conflict of Interest Statement that states that all information disclosed to the recipient during the assessment procedure is confidential and that there are no signs of conflict of interest.

The 2017 review panel recommendations were related to inclusion of labour market experts in the review panels for re-accreditation of higher education institutions and providing training about the national context. In the new re-accreditation procedure labour market representatives are included in the expert panels whenever possible but still, the possibility of composing the review panel without labour market representatives is allowed. As for the training, the new model of the re-accreditation foresees sufficient time for organising a one-day training for each panel just before the visit starts and it has been used in all evaluations following the new model. In addition, the online training was started in 2020.

Analysis

The composition of the expert panels in different assessment procedures is clearly defined. Since the review in 2017 ASHE has implemented the recommendation related to enabling the inclusion of the labour market representatives in the expert group for re-accreditation of the higher education institutions. All experts involved in the expert panels receive training either just before the site visit or during a larger training event.

In regard to thematic evaluations, there are no specific guidelines for composing the expert panel. The thematic evaluation is performed by a working group that develops a report based on questionnaires or statistics collected from the higher education institutions. In the opinion of the review panel, this is not a “group of experts” in the understanding of the ESG and the specific nature of the exercise does not require it. The final reports produced are statistical analysis based on a pre-defined methodology rather than an expert opinion. The absence of a student member or any other representative of stakeholders is also justified by the specific nature of the exercise.

All experts within the panel have the same rights and responsibilities and there is no specific panel member responsible for the report writing. Each panel is led by a chair and supported by an ASHE coordinator who is not supposed to intervene in the assessment process. The review panel learned that the selection of the chair takes place just before the site visit and chairs are selected by the panel members. While the ASHE representatives explained the general approach for selecting the chair and argued that in almost all cases the most experienced and active member of the panel is selected and that there have not been any issues because of this approach, the review panel is of the opinion that timely preparation stage led by the team chair is very important for a successful review. The fact that the team chair is selected just before the site visit also leaves the ASHE coordinator in a position where he/she has to intervene significantly and provide guidance to everyone, including the chair. The

intervention of the ASHE coordinator could be minimised if the chair was selected and briefed in advance. The review panel fully understands the rationale for allowing the panel to choose the chair. Still, the panel points out that there would be a number of advantages for ASHE from adopting a model where the criteria for the chair are clearly defined and the chair is appointed beforehand and briefed in order to lead the preparation for the site visit.

It was mentioned several times during the site visit that internationalisation is one of the priorities of the Croatian higher education system. ASHE contributes to internationalising the system through a systematic involvement of international experts in its assessment procedures. The number of international experts in the ASHE database is impressive and the higher education institutions praise the overall quality of the expert panels and especially the international experts.

ASHE keeps a record on all experts in its internal database. This database allows the staff to select the most appropriate expert group for each of the assessments and also to analyse the composition of the ASHE expert pool by extracting statistics from the database.

Panel commendations

Labour market representatives have been included in the panels for re-accreditation of higher education institutions.

International experts have been included in all expert panels, except for initial accreditation of study programmes and higher education institutions.

Panel suggestions for further improvement

The panel prompts ASHE to consider selecting the expert panel chair earlier and assigning him/her the responsibility for leading the preparatory work in an on-line mode. This could add to quality and consistency of the reviews and optimise the workload for ASHE coordinators.

Panel conclusion: fully compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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.

2017 review recommendations

The panel recommends ASHE 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 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.

Evidence

The assessment procedures by ASHE take place according to methodologies called “procedure” or “manual” that are published on ASHE website. There is a specific methodology designed for each

assessment procedure. The criteria for decision making are set by the national legislation and then elaborated by ASHE according to the ESG.

The decision by ASHE in all procedures, except the audit of higher education institutions, is a recommendation (opinion) on the expert panel's final report by the Accreditation Council which is then submitted to the Ministry for Science and Higher Education for the final decision. In case of audits the Accreditation Council is mandated to issue the final decision - a certificate.

The Accreditation Council acts according to the Rules of Procedure and Ethical Codex. First of all, the Accreditation Council appoints a body of experts whose task is to determine whether the expert panels' final reports are in compliance with the guidelines for the procedure in question. In cases when the report is considered of poor quality, it is sent for further amendments within a set deadline. The Rules of Procedure of the Accreditation Council define three possible decisions for accreditation/re-accreditation of higher education institutions and study programmes:

- accreditation recommendation to issue a licence for an activity or part of activity;
- recommendation to issue a letter of expectation;
- recommendation to deny license.

A letter of expectation is issued with a specific task that the higher education institution has to fulfil in order to have the decision reviewed. The letter of expectation may come with or without an enrolment ban, depending on the significance of the shortcomings.

In case of the audit of a higher education institution there can be two decisions: to issue a certificate or not to issue a certificate.

No collegial decision is foreseen in case of thematic evaluation. The thematic evaluations that have been produced until now have resulted in summary reports that are discussed in the ASHE decision making bodies and presented to the organisation that has initiated the thematic evaluation, for example the Ministry for Science and Higher Education. These summary reports do not suggest any decisions on the level of specific higher education institutions or study programmes.

All Accreditation Council's decisions are primarily based on the expert reports. This is highlighted by the title of the decision-making process as it has been set in all methodologies - providing recommendation (opinion) on the expert panel final reports.

Decisions are taken by a vote and a decision shall be adopted when at least two thirds of the present members (at least 6 members) vote for it.

The consistency of the expert reports and decisions is ensured by procedural guidelines and professional support of ASHE staff.

Each assessment procedure is coordinated by an ASHE coordinator who provides training to the expert panel and comments on the content of the expert report (as elaborated in the analysis section below). Further on, the report is sent to the higher education institution for comments on any factual errors in the report. After the report is completed, it is submitted to the Accreditation Council for decision making.

Analysis

The review panel considers ASHE's procedures and criteria well defined. They are published on the ASHE website under the sections for the relevant assessment procedures.

The procedural steps implemented by ASHE ensure that the reports of the expert panels and decisions of the Accreditation Council are consistent. It is achieved by the guidelines for expert reports, the

role of ASHE coordinator in each assessment procedure and the guidelines for the Accreditation Council.

The representatives of higher education institutions whom the experts met confirmed that the decisions (even the negative ones) have been well justified and explained. The experts, on the other hand, confirmed that there have been significant improvements to the clarity of the guidelines for expert reports and the revised guidelines are more unambiguous than the previous ones.

The methodology for all procedures foresees a stage where the report is sent to the higher education institution for comments. The methodologies however do not state that the institution's comments have to be sent to the expert panel. During the site visit the review panel learned of cases where the higher education institution was not aware if its comments on factual errors had been considered and the review panel members were not aware of whether there have been any comments to their reports. While the review panel acknowledges that insignificant technical issues can be corrected by the ASHE coordinator, it is of the opinion that all comments should be sent to the expert panel because the panel has the ownership of the report and should have the final decision on whether the report is amended. Also, in case there have been any amendments to the report, the final version of the report must be sent to the higher education institution (in addition to publishing it on the agency's website).

The review panel also learned that a number of higher education institutions receive a letter of expectation. In such cases the decision of the Accreditation Council can be reviewed after the higher education institution submits a follow-up report on actions taken to address the identified shortcomings. The most severe condition of the letter of expectation is the enrolment ban that requests the higher education to stop enrolment for a fixed period of time. The review panel was informed that the enrolment ban is applied only when the most important standards are not fulfilled. Also, the methodology, for example, for the re-accreditation of higher education institutions states that a letter of expectation can include the suspension of student enrolment within a set period, especially in cases when significant deficiencies are identified in the delivery of study programmes, which put at risk the achievement of the intended learning outcomes, or if the learning outcomes have not been appropriately defined.

However, during the meetings with stakeholders the review panel learned that the reasoning for an enrolment ban has not always been clear and there would have been cases when the enrolment ban has been applied even if the shortcoming was not linked to teaching activity. As the enrolment ban is a severe judgment with long-term consequences both for the institution and for students, the review panel would ask ASHE to pay special attention to the way how the outcome and reasoning for enrolment ban is communicated to the higher education institutions, both through the methodology and also to the individual higher education institutions.

As explained above, thematic evaluations do not result in outcomes that would be specific for any higher education institution or study programme. It is rather a tool for forming an overall opinion and identifying issues that have to be addressed in detail through other mechanisms.

Panel suggestions for further improvement

The panel urges ASHE to consider a mandatory stage of communicating to the experts about any comments received on their report when finalising the report and informing the higher education institution if any changes have been made to the expert report further to their comments.

The panel encourages ASHE to consider including in the methodologies a more direct definition of cases when enrolment ban can be applied.

Panel conclusion: fully compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

2017 review recommendations

The panel recommends ASHE to include a more in-depth analysis of the compliance of the HEI or study programme against the criteria in its published reports.

The panel recommends ASHE to publish the full reports of the Initial Accreditation procedure.

Evidence

All ASHE's expert reports are published on the agency website on a separate page together with the Accreditation Council's recommendation and the final decision by the Ministry. The reports can also be accessed from the front page of the website - on the section for each assessment procedure (initial accreditation of study programmes etc.).

As for the thematic evaluations, the ASHE website includes a separate section on this activity. Several reports resulting from thematic analysis in the past have been published there, including the last report from 2014 which has been referred to in this expert report.

In 2017 ASHE became a partner in the Database for External Quality Assurance Results (DEQAR) project and since then all expert reports have been transferred to the DEQAR database and are submitted to the database on a regular basis.

As a response to the 2017 review recommendation ASHE publishes full reports on the initial accreditation. However, the links to documentation on initial accreditation of higher education institutions on the ASHE website do not work.

All reports are developed according to a unified template developed for each assessment procedure. All reports produced in English are translated into Croatian before forwarding them to the higher education institution for comments on factual errors. Since initial accreditation currently takes place in Croatian with local experts only, the reports on initial accreditation are available only in Croatian.

All reports consist of a brief summary of advantages and disadvantages, list of institutional good practices, introduction to the higher education institution, detailed analysis and summary list of grades.

Analysis

The review panel recognises the efforts made by ASHE to increase the accessibility and readability of the assessment outcomes, including the reports. The review panel acknowledges improvements made since 2017 regarding publishing the full reports on initial accreditation.

The revision of assessment methodologies has resulted in the comprehensiveness and depth of analysis in the expert reports and the difference between the quality of reports produced in 2016 and 2018, 2019 is visible.

The review panel compliments ASHE for its active involvement in DEQAR, coordinated by EQAR, where ASHE has fully aligned its internal system with the DEQAR database allowing its reports to be

transferred to DEQAR using an automated API submission. The panel learned that ASHE is currently one of the leading partners in the DEQAR CONNECT project where it supports other agencies to set up their report transmission processes.

However, there is still room for improvement in regard to ASHE's own database of reports. While the reports are public, the only search criteria on the agency's website are the title and type of the institution and title of the assessment procedure. The database currently does not foresee a possibility to search by the accreditation decision (positive, negative, with conditions), accreditation term or to see historic information of an institution (higher education institution that was accredited at a certain point but not afterwards). The review panel is aware that such functionality is available in the DEQAR database but, if the main source used by the Croatian society is ASHE's own database, wider search criteria could be useful.

As explained under ESG 2.5, for the credibility of reports, it is important to give a higher education institution the opportunity to comment on the report. It is also important that the expert panel is made aware of these comments, regardless of the number of comments. The review panel would therefore encourage ASHE to implement this practice throughout all reviews in a consistent manner.

The review panel appreciates that the reports on thematic evaluations are published on the ASHE website, too. Performing such exercises and disseminating the results is very important for continuous development of the higher education system. It creates a basis for evidence-based decision making and demonstrates the needs for improvement to the general society.

Panel commendations

ASHE has been a committed and active contributor to the DEQAR project that has increased the visibility of ASHE reports and ASHE itself.

Panel suggestions for further improvement

The panel suggests ASHE rethinks the search criteria available on the ASHE's report database to ensure that the database provides information on the accreditation status and terms of higher education institutions and study programmes.

Panel conclusion: fully compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2017 review recommendations

The panel recommends in the case of the re-accreditation procedure for Higher Education Institutions and study programmes, 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 establishing 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, the panel recommends ASHE to provide an appeal procedure within the Agency.

Evidence

The final outcome of an assessment procedure by ASHE is the opinion (recommendation) of the Accreditation Council which is then submitted to the Ministry for Science and Higher Education, with the exception of an audit procedure where the Accreditation Council takes the final decision. The fact that the final decision is taken by the Ministry for Science and Higher Education also sets the scene for restrictions in regard to the appeals process.

The opinion (recommendation) of the Accreditation Council is not an administrative act, therefore only a complaint can be filed against the agency, not an appeal. Because of legal restrictions, there is also no direct way to appeal to the final decision maker (the Ministry) and the higher education institution can only file a lawsuit before the Administrative Court.

As a response to the 2017 review recommendation, ASHE has established a separate standing Complaints Committee. This committee is in charge of reviewing complaints against the opinion (recommendation) of the Accreditation Council and acts according to the Rules of Procedure of the Complaints Committee. While this committee addresses the final decisions made by ASHE, it is called Complaints Committee instead of Appeals Committee because ASHE's decisions do not have legal power. The committee consists of 3 members and 3 alternate members. The members are appointed by the ASHE Management Board for a period of three years at the proposal of the Rectors' Conference and the Council of Polytechnics and Colleges. As discussed in previous sections, currently the Complaints Committee does not include any study representatives.

The committee reviews complaints about the final outcome in all ASHE's assessment procedures, including the initial accreditation, which was not the case until 2018.

The composition of the committee and the Rules of Procedure are published on the ASHE website. All higher education institution representatives met by the review panel confirmed their awareness of the complaints procedure and the higher education institution who had filed a complaint confirmed that the procedure was clear to them.

Within the second cycle of re-accreditation of higher education institutions, the Complaints Committee considered 15 complaints to the opinion of the Accreditation Council, 13 of which it found unsubstantiated, and two partially substantiated. There have not been any complaints about audits of higher education institutions. The review panel did not learn of any thematic evaluations resulting in complaints, as no formal decisions have been taken on their basis.

Analysis

The review panel acknowledges the establishment of a standing Complaints Committee, a body that is separate from the decision-making body. The review panel analysed a sample of complaints reviewed by the committee and interviewed one of the higher education institutions that had filed a complaint. The panel concludes that the documentation on the complaints was sufficient to justify the decisions taken and that the reasoning for unsubstantiated and substantiated cases was convincing.

However, from the meeting with the higher education institutions the review panel got an impression that, while the complaints procedure itself is very clear, the judgement is based on formal requirements for certain standards and there is very little space for interpretation when it comes to complaints. In other words, the outcome of the complaint is clear before the complaint itself.

Importantly, ASHE uses the terms "complaints" and "appeals" differently from how they are defined in the ESG. According to the ESG, appeals refer to the outcomes of external QA activities and the

HEIs' dissatisfaction with these outcomes, and complaints about the processes that lead to the outcomes. In the case of ASHE, the term "complaints" is used instead of "appeals", which lead the panel to question how HEIs complain about the agency's evaluation processes. While ASHE has put in place a number of mechanisms to ensure that there would not be "complaints" on procedural grounds, the review panel is of the opinion that there could be situations that are not covered by these mechanisms, for example, improper behaviour of an expert panel member or the ASHE coordinator, unsubstantiated changes to the site visit protocol etc. To avoid informal communication about such issues and protect all involved parties, there should be a formal way for voicing them.

Panel commendations

ASHE has introduced a permanent Complaints Committee within the agency.

Panel suggestions for further improvement

The panel proposes ASHE reviews and communicates the policy for complaints about procedural aspects, in addition to the existing complaints' policy.

Panel conclusion: fully compliant

ADDITIONAL OBSERVATIONS

ASHE'S RELATIONSHIPS WITH STAKEHOLDERS

The review panel was impressed by the unanimous support for ASHE from all stakeholders it met during the site visit. While ASHE is a respected institution because of its competencies and important tasks that it carries out, developing and maintaining the feeling of community between the Croatian higher education stakeholders is an achievement. At the same time there was no sign that this familiar touch undermines the professionalism of ASHE. It will be important to continue to find the right balance between fostering this community while ensuring sufficient distance that safeguards the independence of the agency. The review panel would like to highlight it as an exceptional and outstanding feature of ASHE.

RESPONSIBILITY FOR QUALITY ASSURANCE ON THE SYSTEM LEVEL

ASHE has been delegated the responsibility for quality assurance of higher education in Croatia. As a general rule the Ministry takes the final accreditation decisions based on ASHE's recommendation. The review panel was, however, informed of an exception to this rule, whereby initial accreditation was granted without ASHE procedure. These kinds of exceptions have the potential to undermine the trust in the national quality assurance system by sending mixed signals to the society. Such exceptions will also ultimately reflect on the reputation and credibility of ASHE, and therefore they should be avoided. The exception also leads the review panel to encourage a reflection at a system level on whether it would be useful to move the competence for taking the final accreditation decisions from the Ministry to ASHE and/or whether there are other ways of preventing such cases.

CONCLUSION

SUMMARY OF COMMENDATIONS

3.1 Activities, policy and processes for quality assurance

While performing a number of other functions, ASHE has managed to clearly separate and communicate to its stakeholders the external quality assurance processes.

3.3. Independence

The working relationship between ASHE and the Ministry for Science and Higher Education is collegial and professional thus ensuring that the quality assurance agenda can be executed successfully.

3.4. Thematic analysis

The thematic analyses are effectively incorporated in the overall planning of evaluation cycles and ASHE ensures that every cluster and/or cycle of assessment procedures is carefully analysed.

3.5. Resources

Dedication, availability and professionalism of the ASHE management and staff members in support of the external quality assurance processes was highlighted by the stakeholders.

3.6. Internal quality assurance and professional conduct

The internal quality assurance system in ASHE is clearly designed and rigorously implemented thus serving as an example to the higher education institutions that ASHE works with.

2.1. Consideration of internal quality assurance

The systematic work performed to further align the methodologies with the ESG Part I since 2017.

2.3. Implementing processes

The revision of the follow-up procedures and introduction of a separate Follow-up Committee for considering the follow-up reports has increased the trust towards ASHE processes as enhancement led and development oriented.

2.4. Peer-review experts

Inclusion of labour market representatives in the panels for re-accreditation of higher education institutions.

Inclusion of international experts in all expert panels, except for initial accreditation of study programmes and higher education institutions.

2.6. Reporting

Commitment and active role in the DEQAR project that has increased the visibility of ASHE reports and ASHE itself.

2.7. Complaints and appeals

Introduction of a permanent Complaints Committee within the agency.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance

To include student representatives in the Follow-up Committee and Complaints Committee.

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel would like to make some general and more detailed suggestions, extending beyond strictly interpreted ESG and/or linking several ESG, which ASHE may wish to consider when reflecting on its further development. All suggestions have already been signalled in the previous sections.

3.1. Activities, policy and processes for quality assurance

To continue the efforts in ensuring the international perspective in the governing and decision-making structures of the agency.

To diversify the composition of the Accreditation Council to ensure that it better represents the diversity of the higher education landscape in Croatia.

3.3. Independence

To strengthen the autonomy of ASHE even further by delegating the final formal outcome of accreditation procedures to it.

3.4. Thematic analysis

To restructure the section “Publications” on the ASHE website and separating the different types of publications might improve the usability of the website.

3.5. Resources

To continue its efforts to review the number of databases used to ensure that they effectively support the needs of ASHE and can be maintained with minimal resources. This should be done in collaboration with any other actors maintaining related national databases.

3.6. Internal quality assurance and professional conduct

To consider diversifying the feedback mechanisms in order to achieve more qualitative and complex feedback that would better facilitate further improvement.

2.1. Consideration of internal quality assurance

To follow closely the developments related to the CROQF and ensure that the initial accreditation procedure investigates compliance with the academic and occupational qualification standards when those are available.

To align the information on initial accreditation of study programmes and higher education institutions published on the ASHE website to clearly demonstrate the relation of both activities and avoid duplication.

2.4. Peer-review experts

To select the expert panel chair earlier and to assign him/her the responsibility for leading the preparatory work in an on-line mode. This could add to quality and consistency of the reviews and optimise the workload for ASHE coordinators.

2.5. Criteria for outcomes

To consider a mandatory stage of communicating to the experts about any comments received on their report when finalising the report and informing the higher education institution if any changes have been made to the expert report further to their comments.

To consider including in the methodologies a more direct definition of cases when enrolment ban can be applied.

2.6. Reporting

To rethink the search criteria available on the ASHE's report database to ensure that the database provides information on the accreditation status and terms of higher education institutions and study programmes.

2.7. Complaints and appeals

To review and communicate the policy for complaints about procedural aspects, in addition to the existing complaints' policy.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, ASHE is in compliance with the ESG.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

TIMING	TOPIC	PERSONS FOR INTERVIEW
01.06.2021		
17:00 - 18:00	Pre-visit meeting with the agency's resource person to clarify any remaining question after the online clarification meeting	Professor Jasmina Havranek, ASHE Director Dr. sc. Vesna Dodiković Jurković, ASHE Deputy Director Mr. sc. Sandra Bezjak, Assistant Director for Higher Education Mr. sc. Emita Blagdan, Assistant Director for International Cooperation
04.06.2022		
13:00 - 14:00	Review panel private meeting	
07.06.2022		
9:00 - 9:30	Review panel private meeting	
9:30 - 9:45	Connection set-up	
9:45 - 10:30	Meeting with the Director of ASHE and President of the Management Board	Professor Jasmina Havranek, ASHE Director Professor Dijana Vican, President of the Management Board
10:30 - 10:45	Connection set-up/ Review panel's private discussion	
10:45 - 11:30	Meeting with the team responsible for preparation of the self-assessment report	Dr. sc. Vesna Dodiković Jurković, ASHE Deputy Director Mr. sc. Sandra Bezjak, Assistant Director for Higher Education Dr. sc. Irena Petrušić, Head of Department of Research and Development Mr. sc. Emita Blagdan, Assistant Director for International Cooperation

11:30 - 11:45	Connection set-up/ Review panel's private discussion	
11:45 - 12:45	Meeting with the key staff in charge of external QA activities, including the assessment coordinators	Ivana Borošić, Head of Department of Accreditation in Higher Education Dr. sc. Mia Đikić, Head of Department of Accreditation of Science Goran Briški, Head of Audit Department Frano Pavić, assessment coordinator in Department of Accreditation in Higher Education Vlatka Šušnjak Kuljiš, assessment coordinator in Department of Accreditation in Higher Education Mr. sc. Mina Đorđević, Head of International Cooperation
12:45 - 13:30	Lunch	
13:30 - 13:45	Connection set-up/ Review panel's private discussion	
13:45 - 14:30	Meeting with the staff providing support for QA activities, including the office of internal QA	Dr. sc. Vesna Dodiković Jurković, Deputy Director Marija Križanec, Head of Department for Higher Education Davor Jurić, Department of Analytics and Statistic Tomislav Tomljenović, Head of IT Department Mirna Mandić, Head of Office for Legal issues, Department for General, Legal Issues and Human Resources Željka Plužarić, Public Relations
14:30 - 14:45	Connection set-up/ Review panel's private discussion	
14:45 - 15:30	Meeting with the Accreditation Council and the Follow-Up Committee	Professor Sonja Vila, President of the Accreditation Council (AC) Professor Mirela Galić, member of AC Professor Katija Vojvodić, member of AC Professor Zoran Ježić, member of AC Professor Mario Cifrek, The Follow-up Committee
15:30 - 16:30	Review panel's private discussion	
08.06.2021		
9.00-9.30	Review panel private meeting	

9:30-9:45	Connection set-up	
9:45 - 10:30	Meeting with ministry representatives	Professor Radovan Fuchs, minister, Ministry of Science and Education Ivica Šušak, State Secretary, Ministry of Science and Education Professor Dragan Primorac, former minister for science, education and sport
10:30 - 10:45	Connection set-up/ Review panel's private discussion	
10:45 - 11:45	Meeting with representatives of HEIs involved in audit, initial accreditation and re-accreditation of higher education institutions	Professor Damir Markučić, The Faculty of Mechanical Engineering and Naval Architecture (FAMENA), University of Zagreb Doc. dr. sc. Mislav Balković, Dean of Algebra University College Professor Maja Martinović, Zagreb School of Economics and Management Professor Neven Vrček, The Faculty of Organization and Informatics University of Zagreb Dr. sc. Marijana Ivanek-Martinčić, Križevci College of Agriculture Professor Kruno Miličević, Faculty of Electrical Engineering, Computer Science and Information Technology, Josip Juraj Strossmayer University of Osijek Doc. dr. sc. Lana Ciboci, vice dean for scientific affairs and quality management at Edward Bernays University College
11:45 - 12:00	Connection set-up/ Review panel's private discussion	
12:00 - 12:45	Meeting with representatives of HEIs involved in initial accreditation for delivering a study programme and re-accreditation of doctoral study programmes	Doc. dr. sc. Gordana Nikolić, Dean of the PAR University College Doc. dr. sc. Verica Budimir, lecturer and quality coordinator, Polytechnic in Požega Professor Dean Konjević, The Veterinary Faculty of the University of Zagreb, Vice-dean for science, postgraduate education and lifelong learning (Postgraduate doctoral study programme) Professor Maja Matijašević, University of Zagreb, Faculty of Electrical Engineering and Computing (Postgraduate doctoral study programme)
12:45 - 13:45	Lunch	
13:45 - 14:00	Connection set-up/ Review panel's private discussion	
14:00 - 15:00	Meeting with representatives from the reviewers' pool	Professor Monika Metykova, School of Media, Film and Music, University of Sussex Professor Donald Sannella University of Edinburgh, United Kingdom of Great Britain and Northern Ireland Professor Ben Hicks, Department of Mechanical Engineering, University of Bristol, United Kingdom of Great Britain and Northern Ireland

		Professor Sandra Janković, Faculty of Tourism and Hospitality Management, University of Rijeka Dr. sc. Nataša Trojak, senior lecturer, Algebra University College Iris Jerković, University of Zagreb, Faculty Economics, student Morana Mratović, CEMEX Hrvatska, Quality system manager
15:00 - 15:15	Connection set-up/ Review panel's private discussion	
15:15 - 16:00	Meeting with members of Complaints Committee	Professor Mario Vinković Professor Josip Faričić
16:00 - 17:00	Review panel's private discussion/ Meeting to agree on issues to be clarified	
09.06.2021		
9:00 - 9:30	Meeting with students	Pegi Pavletić Lea Paulić Duje Skender Luka Marković Luka Cavaliere Lokas
9:30 - 9:45	Connection set-up/ Review panel's private discussion	
9:45 - 10:30	Meeting with the stakeholders of the agency	Professor Snježana Prijic Samaržija, Rector, University of Rijeka, Rectors Conference of the Republic of Croatia Professor Marin Milković, President of Rectors Conference of the Republic of Croatia Professor Vlatko Cvrtila, former President of Council of Polytechnics and Colleges of the Republic of Croatia, Rector of Vern University, Hvoje Balen, Vice president of ICT Association of Croatian Employers' Association dr. sc. David Matthew Smith, Director General of Institute Ruđer Bošković
10:30 - 11:45	Review panel's private discussion	
11:45 - 12:50	Meeting with CEO to clarify any pending issues	Professor Jasmina Havranek, ASHE Director Dr. sc. Vesna Dodiković Jurković, Deputy Director Mr. sc. Sandra Bezjak, Assistant Director for Higher Education

12:50 - 13:30	Lunch	
13:30 - 15:00	Private meeting between panel members to agree on the main findings	
15:00 - 15:30	Final de-briefing meeting with staff of the agency to inform about preliminary findings	Professor Jasmina Havranek, ASHE Director Dr. sc. Vesna Dodiković Jurković, Deputy Director Mr. sc. Sandra Bezjak, Assistant Director for Higher Education

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

I. Background and context

ASHE was established in 2004 by the Government of the Republic of Croatia as the only institution tasked with accreditation procedures in higher education and research in the Republic of Croatia. ASHE became the only national body responsible for carrying out external evaluation in higher education and science in 2009, by the Act on Quality Assurance in Science and Higher Education

It is funded from the state budget. The mission of ASHE is to promote the importance of quality assurance in higher education and science with the aim of continuous quality improvement of higher education institutions, scientific organisations and the overall Croatian system of science and higher education and its recognisability within the European Higher Education Area and the European Research Area, while encouraging the society's sustainable development.

ASHE performs external quality assurance procedures, professional recognition of foreign higher education qualifications, collecting and processing data on Croatian higher education, science and related systems, providing information and unifying data on the conditions of enrolment to higher education institutions in the Republic of Croatia, and supporting the activities of a number of national bodies. It is currently the only agency whose accreditation recommendations are accepted by the Croatian Government for Croatian institutions and programmes.

In 2015 it launched an evaluation procedure in Slovenia, at the request of a private HEI as well as an evaluation procedure of the University of Mostar, Bosnia and Herzegovina, in 2017. In 2020 ASHE received legal interpretation of the national HE laws from Croatian Ministry of Science and Education and their support for ASHE to apply European Approach to evaluation of joint studies.

The external quality assurance procedures carried out by ASHE in higher education are initial accreditation and re-accreditation of study programmes and higher education institutions, and audit of higher education institutions. In addition to this, ASHE performs thematic evaluations.

Initial accreditation is an evaluation procedure carried out for the new HEIs, new study programmes by private higher education institutions (universities, polytechnics and colleges) and public polytechnics and colleges and also for the new scientific organizations established and/or financed by state. In this process the fulfilment of necessary accreditation criteria is checked.

Re-accreditation of higher education institutions is an external evaluation procedure carried out in five-year cycles, and is mandatory for all public and private higher education institutions in Croatia. It assesses compliance with necessary requirements (academic threshold) and provides a quality grade. The goal of the re-accreditation is to determine whether the evaluated institution meets the necessary criteria prescribed by national standards and ESG.

Re-accreditation of the Part of the Activities of Higher Education Institutions (Re-accreditation of PhD study programmes)

Re-accreditation of a part of the activity is an external evaluation procedure which assesses the quality of a part of the activity of the higher education institution. In the previous period, as a procedure for re-accreditation of part of the activity, re-accreditation of postgraduate doctoral studies was carried out. It was initiated as an extraordinary re-accreditation, at the request of the Minister. It was an external evaluation procedure which aims to ensure that the higher education qualifications that award the academic title of "doctor of science" (PhD) reflect study programmes of high quality that are internationally comparable. In addition to checking compliance with the legal requirements, the procedure includes an external quality assessment carried out by an international expert panel, and issuance of recommendations for each individual programme. Through this quality assurance procedure, ASHE ensures that Croatian doctoral study programmes - and the qualifications they offer

- satisfy domestic and international threshold criteria of academic quality. Re-accreditation of postgraduate university doctoral (PhD) study programmes conducted by ASHE from 2016 till 2018 is finished. This type of re-accreditation will not be carried out cyclically, but the implementation of recommendations will be monitored through follow-up procedures.

Audit of a higher education institution is a systematic, periodic procedure used to assess whether the internal quality assurance system of a higher education institution is effective and developed according to ESG and the ASHE Audit Criteria. The purpose of the audit is to encourage continuous development of HEIs' internal quality assurance and quality culture. It is carried out in a five-year cycle.

Thematic evaluation in higher education

Thematic evaluation in higher education is carried out either on official duty and according to the annual plan of the ASHE, or following a request from the minister, higher education institution, or student council of the higher education institution. It is carried out in order to check, evaluate and develop the quality of the HE institution and/or study program within the scope of specific themes. It is performed as a "tailor made" procedure meaning that for each individual thematic evaluation ASHE develops a separate procedure, specific methodology and detailed criteria depending on the theme of evaluation. Thematic evaluation does not end with a formal decision in terms of making the accreditation recommendation or the decision of the Ministry, but the result of this procedure is a report with an analysis forwarded to the applicant and published on the ASHE web. In the past period (last six years) ASHE has not received any request for thematic evaluation, therefore there are no any recent outcomes from this type of evaluation.

ASHE has been a member of ENQA since 2011 and is applying for ENQA renewal of membership. ASHE has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2011 and is applying for renewal of EQAR registration.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which ASHE fulfils the requirements of Parts 2 and 3 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of ASHE should be reconfirmed and to EQAR to support ASHE application to the register.

2.1 Activities of ASHE within the scope of the ESG

In order for ASHE to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of ASHE that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary in nature.

The following activities of ASHE have to be addressed in the external review:

- Re-accreditation of higher education institutions
- Re-accreditation of the Part of the Activities of Higher Education Institutions (Re-accreditation of PhD study programmes)
- Audit of higher education institutions
- Initial accreditation (of higher education institutions and programmes).
- Thematic evaluations*.

*This activity will be addressed in a general way only, considering ad-hoc character and that none have taken place in the last 5 years.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the Guidelines for ENQA Agency Reviews and the requirements of the EQAR Procedures for Applications.

The evaluation procedure consists of the following steps:

- Formulation and agreement on the Terms of Reference for the review between ASHE, ENQA and EQAR;
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by ASHE including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ASHE;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Decision making by the EQAR Register Committee on the agency's registration on EQAR;
- Follow-up of the panel's and/or the ENQA Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Review Coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide ASHE with the list of suggested experts and their respective curricula vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the ASHE review.

3.2 Self-assessment by ASHE, including the preparation of a self-assessment report

ASHE is responsible for the execution and organisation of its own self-assessment process and shall consider the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the ENQA Board's membership decision letter and the instances of partial compliance noted in the previous EQAR Register Committee decision of inclusion/renewal. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which ASHE fulfils its tasks of external quality assurance and meets the ESG.
- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule shall be given to ASHE at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted in a site visit by the ENQA Review Coordinator.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as

defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each standard of part 2 and 3 of the ESG. A draft will be first submitted to the ENQA Review Coordinator who will check the report for consistency, clarity and language, and it will be then submitted to ASHE usually within 10 weeks of the site visit for comment on factual accuracy. If ASHE chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by ASHE and finalise and submit the document to ENQA.

The report is to be finalised within three months of the site visit and will normally not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the EQAR Policy on the Use and Interpretation of the ESG to ensure that the report will contain sufficient information for the consideration of the Register Committee of the agency's application to EQAR¹.

For the purpose of applying for ENQA membership, ASHE is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which ASHE expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

ASHE will receive the expert panel's report and publish it on its website once the ENQA Board has approved the report. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. As part of ENQA Agency Review follow-up activities, ASHE commits to react on the review recommendations and submit a follow-up report to the ENQA Board within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision. The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to ASHE. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the ENQA Board for the purpose of reaching a conclusion on whether ASHE can be admitted/reconfirmed as a member of ENQA. The report is also used as a basis for the Register Committee's decision on the agency's registration on EQAR. The review process is thus designed to serve these two purposes. However, the review report is to be considered final only after being approved by ENQA. Once submitted to ENQA and until it is approved by its Board, the report may not be used or relied upon by ASHE, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

¹ See here: <https://www.eqar.eu/assets/uploads/>

For the purposes of EQAR registration, the agency will submit the review report (once approved by the ENQA Board) via email to EQAR before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, full curriculum vitae (CVs) of all review panel members and any other relevant documents to the application (i.e. annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in March 2022.

7. Indicative Schedule of the Review

Agreement on terms of reference	November 2020
Appointment of review panel members	January 2021
Self-assessment completed	15 April 2021
Pre-screening of SAR by ENQA Review Coordinator	End-April 2021
Preparation of site visit schedule and indicative timetable	April 2021
Briefing of review panel members	May 2021
Review panel site visit	Mid-June 2021
Draft of evaluation report and submitting it to ENQA Review Coordinator for pre-screening	End-August 2021
Draft of evaluation report to ASHE	September 2021
Statement of ASHE to review panel if necessary	October 2021
Submission of final report to ENQA	November 2021
Consideration of the report by ENQA Board	December 2021
Publication of report	January 2022
EQAR Register Committee meeting	March 2022

ANNEX 3: GLOSSARY

APQN	Asia Pacific Quality Network
ASHE	Agency for Science and Higher Education
CEENQA	Network of Central and Eastern European Quality Assurance Agencies in Higher Education
CHEA	International Quality Group of the American Council for Higher Education Accreditation
CROQF	Croatian Qualifications Framework
DEQAR	Database for External Quality Assurance Results
ECA	European Consortium for Accreditation
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
EUPRIO HE	European Association of Communication Professionals in Higher Education higher education
HEI	higher education institution
IAAO	International Association of Admissions Organisations
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IREG Observatory	IREG Observatory on Academic Ranking and Excellence
QA	quality assurance
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ASHE

Self-assessment report (May 2021)

Annex 1 – Act on Scientific Activity and Higher Education (Official Gazette 123/03, 105/04, 174/04, 02/07 Decision of the Constitutional Court of the Republic of Croatia, 46/7, 45/09)

Annex 2 – Act on Quality Assurance in Science and Higher Education (Official Gazette 45/09)

Annex 3 – Statute of the Agency for Science and Higher Education

Annex 4 – Ordinance on the Content of a Licence and Conditions for Issuing a Licence for Performing Higher Education Activity, Carrying out a Study Programme and Re-Accreditation of Higher Education Institutions (Official Gazette 24/10)

Annex 5 – Ordinance on Conditions for Issuing Licence for Scientific Activity, Conditions for Re-accreditation of Scientific Organisations and Content of Licence (Official Gazette 83/2010)

Annex 6 – Accreditation Council Rules of Procedure

Annex 7 – Complaints Committee Rules of Procedure

Annex 8 – Follow-up Committee Rules of Procedure

Annex 9 – Table 3 Conformity of quality standards with Part I. of ESG (standard 2.1.)

Annex 10 – Follow-up Report

ADDITIONAL DOCUMENTS PROVIDED BY ASHE BEFORE THE SITE VISIT, ON REQUEST OF THE REVIEW PANEL

Composition of the follow-up committee

Composition of the complaints committee

Statistics and information on cases where there have been differences in recommendations by the Accreditation Council and the final decision by the minister (if such cases exist).

Plan/overview/policy of thematic analysis foreseen for the current strategic period

Screen-shots from the CEP, MOZVAG and expert databases

Proof of legal relationship between ASHE and Centre for Scientific Information of the Ruder Boškovic Institute

Short profiles of all ASHE staff members working on the processes that are subject to this review (by indicating the main tasks of each member and the structural unit that they belong to)

Information on the staff turnover for the current ENQA reporting period

Budget plan for 2020-2023

Latest annual operative plans (for 2020 and 2021)

Results of the last survey for Accreditation Council on cooperation with ASHE departments

Results of the latest annual survey on stakeholder satisfaction (especially open comments answers)

Quality Manual

Short overview of the ESG application in the cross-border QA

The relation of the number of Croatian and foreign experts for different assessment procedures and a defined minimum/maximum number for each procedure, if there is

Documentation for complaints cases in the second cycle of re-accreditation – for 2 partially substantiated cases and 2 unsubstantiated cases

OTHER SOURCES USED BY THE REVIEW PANEL

ASHE website azvo.hr and azvo.hr/en

ASHE self-assessment reports and expert reports published on the ENQA website

Decisions on ASHE on the EQAR website

ENQA AGENCY REVIEW 2022

THIS REPORT presents findings of the ENQA Agency Review of the Agency for Science and Higher Education (ASHE), undertaken in 2021.

enqa.

European Association for
Quality Assurance in Higher Education