Report 1: NOKUT and the European standards and guidelines for external quality assurance agencies

Evaluation of NOKUT – The Norwegian Agency for Quality Assurance in Education

Liv Langfeldt, Lee Harvey, Jeroen Huisman, Don Westerheijden & Bjørn Stensaker
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From quality assurance to quality improvement

In March 2007, the Norwegian Ministry of Education and Research invited interested parties to submit proposals for an external review of the Norwegian Agency for Quality Assurance in Education (NOKUT). The review had two aims. The first was to examine whether NOKUT meets the “Standards and Guidelines for Quality Assurance in the European Higher Education Area”\(^1\) adopted at the fourth ministerial meeting of the Bologna Process in Bergen in May 2005. The second was to evaluate the role played by NOKUT in the Norwegian higher education system.

An evaluation of the Quality Reform was completed in 2007. In May 2006, the government appointed a commission charged with making recommendations for the further development of Norwegian higher education in a 20-year perspective. In this context, the Ministry wanted an independent assessment of whether NOKUT is fulfilling its mandate in line with the intentions behind its establishment in 2003. One of the key issues to be assessed was whether NOKUT contributes substantially to both assuring and developing the quality of Norwegian higher education and other post-secondary vocational education. Another important question was how NOKUT understands its own mission and responsibility.

The international evaluation team has delved deeply into the work of NOKUT and come up with two reports. Both will be useful in helping the Ministry, NOKUT and the institutions to further develop and enhance the quality of Norwegian higher and post-secondary education. The reports also represent the first external review of Norway’s national quality assurance agency in line with the requirements of the European standards and guidelines.

Tora Aasland
Minister for Science and Higher Education

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Preface

This report was commissioned by the Norwegian Ministry for Education and Research to assess whether NOKUT meets the Standards and Guidelines for Quality Assurance in the European Higher Education Area, and furthermore for meeting the demand for external five-year cyclical reviews of European higher education quality assurance agencies.

The Ministries commission involved two evaluation reports; the present one, and a second more comprehensive report evaluating NOKUT’s role in the Norwegian educational system. For an elaboration of the recommendations provided in the present report, Report 2 on NOKUT’s national role should be consulted.

Following a tender, NIFU STEP was given the contract for the evaluation which was performed by a team of five researchers; Lee Harvey (The Higher Education Academy, UK), Jeroen Huisman (International Centre for Higher Education Management, University of Bath, UK), Liv Langfeldt (NIFU STEP, Norway), Bjørn Stensaker (NIFU STEP, Norway) and Don Westerheijden (Center for Higher Education Policy Studies, University of Twente, the Netherlands). Two NIFU STEP researchers assisted the evaluation team; Inge Ramberg assisted with the surveys to NOKUT panel members and to evaluated institutions, and Taran Thune provided analyses of NOKUT’s audits and accreditation reports.

We are grateful to the many NOKUT panel members and valuees who contributed to this evaluation through questionnaire replies, and all the interviewed NOKUT staff and stakeholders and visited institutions who took the time to share their experiences and insight with us.

February 2008,

Lee Harvey
Jeroen Huisman
Liv Langfeldt
Bjørn Stensaker
Don Westerheijden
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1 Introduction

1.1 Background and Terms of Reference

This evaluation of NOKUT was initiated and commissioned by the Norwegian Ministry of Education and Research. The evaluation has two main purposes:

- To examine whether NOKUT meets the Standards and Guidelines for Quality Assurance in the European Higher Education Area adopted by the Ministers responsible for higher education in the members states of the Bologna process in Bergen in May 2005.
- To evaluate the national role of NOKUT in the Norwegian educational system.

This report addresses the first one of these aims. The second aim is addressed in a separate report by the same evaluation team. The first aim is related to the recommendations for (five year interval) external reviews of quality assurance agencies, put forward in the Standards and Guidelines for Quality Assurance in the European Higher Education Area. Such evaluations are required for membership in the European Network for Quality Assurance in Higher Education (ENQA). Being established in 2002 and starting its activities in 2003, an evaluation in 2007–2008 is in line with the recommendations in the European Standards and Guidelines. The main aim of this report is consequently to assess how NOKUT and its activities relate to the European Standards and Guidelines. Chapter 2 starts out with discussing the European Standards and Guidelines and their interpretation and operationalisation.

NOKUT’s main roles and tasks are stated in the Act relating to Norwegian universities and university colleges and in the Act relating to Norwegian tertiary vocational education. The Act relating to universities and university colleges state that:

NOKUT shall be a professionally autonomous state body which, by means of accreditation and evaluation, shall monitor the quality of Norwegian institutions that provide higher education and recognize qualifications awarded by institutions not subject to this Act. Accreditation and evaluation activities shall be designed in such a way that the institutions can benefit from them in the course of their quality assurance and development work.


4 Act no. 15 of 1 April 2005 and Act no. 90 of 29 June 2007.
NOKUT’s assigned tasks include:

1. Evaluation of higher education institutions’ systems for quality assurance.
2. Accreditation of higher education institutions and study programmes, and revision of previously granted accreditation.
3. Evaluations of significance to assessment of the quality of higher education.
4. General recognition of qualifications awarded by foreign higher education institutions and Norwegian institutions not subject to the Act relating to universities and university colleges.
5. Accreditation, as well as revisions of previously-granted accreditations, of tertiary vocational education.

This evaluation addresses the first three of these tasks. The standards, criteria and procedures for each task are described in Report 2, Chapter 3. Below is an account of the data sources and methods for the evaluation. The data and methods for the two evaluation reports are the same, except that the second report is somewhat more comprehensive, as it also covers data on vocational school and recognition of foreign qualifications.

1.2 Data sources and methods

The evaluation adopted a research-based approach in order to get a solid basis for assessments and recommendations. The evaluation team comprised independent, high-level experts in higher education evaluation and quality assurance. The team collected a broad set of data from a wide variety of sources and stakeholders, drawing on the latter’s experiences and perceptions, without any single stakeholder being represented on the evaluation team. Qualitative and quantitative data are combined, providing a basis for data triangulation and extensive and thorough analyses.

Background information, as well as input on NOKUT’s experiences and views was obtained through:

- Self-evaluation reports from NOKUT
- Site visit to NOKUT and interviews with NOKUT leadership and staff
- The formal documents describing NOKUT’s standards, criteria and procedures (including acts and regulations)
- Studies of NOKUT’s evaluation and accreditation reports

Insight into stakeholders’ experiences and views was obtained through:

- Site visits to institutions subjected to NOKUT evaluations and accreditations
- Survey to staff, students and leadership at higher education institutions exposed to NOKUT evaluations and accreditations
- Surveys to members of NOKUT’s accreditation and evaluation panels
Interviews with stakeholders (the national interest organisations for students, academic staff, and Norwegian business and industry were consulted, along with the Ministry of Education and Research)

**Self-evaluation reports from NOKUT**

In line with the two different aims of the evaluation, two self-evaluation reports were demanded from NOKUT. The first (Part 1) presents NOKUT with regard to the membership criteria of the European Association for Quality Assurance in Higher Education (ENQA).\(^5\) The second (Part 2) deals with NOKUT’s national role and is not dealt with in this evaluation report.\(^6\) Part one was based on the prescribed content for an agency’s self-evaluation as described in the *European Standards and Guidelines* (2007, pp. 34–47).\(^7\)

**Site visit to NOKUT and interviews with NOKUT leadership and staff**

The evaluation team conducted a two-day visit to NOKUT. In total 33 persons were interviewed during the visit (see Appendix 2). The interviews elaborated the information given in the self-evaluation reports and provided a better overview of, and insights into, the different aspects of NOKUT’s various tasks, as well as a better understanding of NOKUT’s achievements and challenges.

**The formal documents describing NOKUT’s standards, criteria and procedures**

The evaluation team reviewed all formal documents describing NOKUT’s standards, criteria and procedures, including the acts relating to universities and university colleges and to tertiary vocational education, the relevant ministerial regulations, NOKUT’s criteria and descriptions of procedures for its various tasks, as well as documents relating to NOKUT’s internal quality assurance system and its annual reports. Most of the documents were made available to the evaluation team in English.

**Studies of NOKUT’s audit, evaluation and accreditation reports**

Studies of the content of the various kinds of NOKUT expert panel reports were conducted to get insight into the operationalisation and weighting of criteria, and the consistency in arguments for negative and positive conclusions.

- Taran Tune (NIFU STEP) conducted a study of the institutional accreditation reports and the quality assurance audits reports (brief studies of all 46 quality assurance audits


\(^7\) [http://www.enqa.eu/files/ESG_v03.pdf](http://www.enqa.eu/files/ESG_v03.pdf)
reports, as well as detailed studies of 15 selected quality assurance audits reports and all 8 institutional accreditation reports).

- The evaluation team conducted brief studies of selected reports on Master programmes reports (8 negative reports) and all (11) PhD programmes reports.
- Concerning the reaccreditations, the team drew on the study of nursing education reaccreditation already conducted by Finn Daniel Raaen.8

**Site visits to institutions exposed to NOKUT evaluations and accreditations**

The evaluation team visited six selected institutions that had experienced NOKUT evaluations and accreditations (Appendix 2). In total 56 persons were interviewed, covering leadership and administration, students and members of academic staff. The interviews dealt with their experiences and views on the criteria for the audits and accreditations, the NOKUT panels and their site visits, feedback, learning and (other) results of the audits, evaluations and accreditations, NOKUT’s function and independence, staff and expertise, information and communication.

**Surveys to members of NOKUT’s accreditation and evaluation panels**

In order to study the experiences and considerations of the persons serving on the panels appointed to assist NOKUT in performing their various tasks (quality assurance audits, (re)accreditations and evaluations), NIFU STEP conducted a web-based survey of the panel members. NOKUT provided a close-to-complete list of all persons who had served on one or more of their panels, in total 488 persons. The researchers obtained correct e-mail addresses for 431 of these and replies were obtained from 80 percent.

The survey addressed experiences and opinions on a broad set of issues:

- the preparation for the evaluation, and the framework conditions for the evaluation
- the purpose of the evaluation/audit/(re)accreditation (controlling vs. improving quality)
- information sources
- reaching agreement in the panel
- opinions of the quality of the object under review
- organisation of the work
- NOKUT’s qualifications, organisation and procedures

As several persons have served on more than one panel, they were asked to relate their answers to the last completed evaluation, audit or accreditation that they had been involved in. The web-based questionnaire also contained ample space for free text comments that provided

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information and views on issues not covered by the predefined questions. The results of the survey are presented in Appendix 4 of Report 2.

Survey to staff, students and leadership at higher education institutions exposed to NOKUT evaluations and accreditations

NIFU STEP conducted a survey to higher education institutions subjected to NOKUT’s various evaluations, audits and (re)accreditations. A strategic sample was composed based on the programmes for the NOKUT panels’ site visits 2005 to 2007 and NOKUT’s lists of contact persons at the institutions. The intention was to establish a sample large enough for analysing the opinions and experiences of different respondent groups separately (institutional leadership, students and academic staff) and also split the data by the various kinds of accreditations, audits and evaluations. A total of 567 persons mentioned in the site visit programmes were selected. Of these, the team obtained correct e-mail addresses to 526 persons and 64 percent of these completed the survey.

The survey addressed experiences and opinions on a broad set of issues:
- the purpose of the evaluation/audit/accreditation (controlling vs. improving quality)
- the information from NOKUT
- the work associated with the application or self-evaluation
- the visit of the NOKUT panel
- result and impact of the evaluation/audit/accreditation
- NOKUT’s qualifications, organisation and procedures

As several respondents had been involved with more than one NOKUT evaluation, audit or (re)accreditation, they were asked to relate their answers to the last one completed. The web-based questionnaire also contained space for free text comments that provided information and views on issues not covered by the predefined questions. The results of the survey are presented in Appendix 4 of Report 2.

Interviews with stakeholders

The evaluation team invited a broad range of national organisations, as well as the Ministry of Education and Research, to elaborate on their experiences, opinions and concerns about NOKUT’s activities and role. The organisations interviewed include the Norwegian Association of Higher Education Institutions (UHR), the Network for Private Higher Education Institutions (NPH), the National Union of Students (NSU), the Norwegian Association of Students (StL), the Association of Norwegian Students Abroad (ANSA), the Norwegian Association of Researchers, and Forum for Vocational Schools (NHO/Abelia). Appendix 2 provides an overview of the interview programme.
The different groups of stakeholders covered

The table below shows the total number of persons interviewed or surveyed. The number of student respondents and informants is somewhat lower than the team had hoped for. Student response rates in evaluation studies are generally lower than other respondent groups. This probably relates both to the fact that students often are somewhat less involved in and informed about NOKUT’s activities and that students are more mobile and more often change their e-mail addresses. Nonetheless the team obtained views and experiences of a total of 106 students.

Table 1.1  Number of respondents and informants, by group

<table>
<thead>
<tr>
<th>Group of respondent/informant</th>
<th>Surveys</th>
<th>Site visits/visits interviews</th>
<th>Interviews interviewers stakeholders</th>
<th>Site visits/interviews NOKUT</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOKUT staff and leadership</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>28</td>
</tr>
<tr>
<td>Members NOKUT panels (excl students)</td>
<td>335</td>
<td></td>
<td></td>
<td></td>
<td>335</td>
</tr>
<tr>
<td>Students</td>
<td>89</td>
<td>10</td>
<td>5</td>
<td>2</td>
<td>106</td>
</tr>
<tr>
<td>Staff and leadership at evaluated institutions</td>
<td>326</td>
<td>46</td>
<td></td>
<td></td>
<td>372</td>
</tr>
<tr>
<td>Other stakeholders</td>
<td>6</td>
<td></td>
<td>13</td>
<td>3</td>
<td>22</td>
</tr>
<tr>
<td>Total</td>
<td>756</td>
<td>56</td>
<td>18</td>
<td>33</td>
<td>863</td>
</tr>
</tbody>
</table>

Note: Numbers include all informants and respondents for the evaluation, also 53 vocational school respondents and one visited vocational school – data which is only used for the second evaluation report.
2 European agencies’ interpretation and operationalisation of the European standards

The European Standards and Guidelines are in principle a set of guidelines on how to conduct different aspects of quality assurance in higher education and they specify some expectations in the form of quality standards. The European Standards and Guidelines were not written as a set of binding regulations or requirements and are not a set of compliance criteria to be checked off. However, many quality assurance agencies are using the European Standards and Guidelines as a substantive guide against which to map their own activities.

Although the evaluation team wants to emphasise the guiding nature of the European Standards and Guidelines it is clear, that for purposes of the report to the Ministry (and onwards to ENQA) that reference to the specific elements of Part Two of the Guidelines would be appropriate and helpful in framing the work of NOKUT. As the section on cyclical review of agencies in the European Standards and Guidelines emphasises that the external review ‘must always explicitly consider the extent to which the agency conforms with the European standards for external quality assurance agencies’, the evaluation team has thoroughly assessed NOKUT’s compliance with the eight standards for external quality assurance agencies in the European Standards and Guidelines. Assessments and conclusions for each standard are provided in Chapter 3.

Below follows a brief overview of how the standards are interpreted and operationalised in previous reviews of European agencies.9 The numbers and acronyms in Table 2.1 refer to the evaluations of the following agencies (reports downloaded from www.enqa.eu):10

1. The Higher Education Training and Awards Council (HETAC, Ireland)
2. Danish Evaluation Institute (EVA)
3. The Swedish National Agency for Higher Education (HsV)
4. The Center for Accreditation and Quality Assurance of the Swiss universities (OAQ)
5. The National Agency for Quality Assessment and Accreditation of Spain (ANECA)
6. The Agency for Quality Assurance in the Catalan University System (AQU)

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9 This is not based on any comprehensive study of the reports, but a brief study of the relevant parts of the reports.

10 Two more reports are listed at ENQA’s website (ASIIN and ACQUIN, Germany), but not included here as the European Standards and Guidelines are not interpreted or used as basis for these reports. Moreover, the evaluation of the Flemish-Dutch NVAO was published too recently to be taken into account.
| Table 2.1 Focus and conclusion in reviews of European Quality assurance agencies |
|-------------------|-------------------------------------------------|-------------------|-------------------|
| 1. Use of external quality assurance procedures for higher education (as in ESG Part 2) |
| 2. Official status |
| 3. Activities |
| 4. Resources |
| 5. Mission statement |
| 6. Independence |
| 7. External quality assurance activities (as in ESG Part 2) |
| 8. Accountability procedures |

**1. Use of external quality assurance procedures for higher education (as in ESG Part 2)**
- **1. HETAC**: Account of how each of the standards in each of the ESG Part 1.
- **2. EVA**: Recognised in the University Act.
- **3. HSA**: EVA.
- **4. OAQ**: EVA.
- **5. ANECA**: EVA.
- **6. AQU**: EVA.

**2. Official status**
- **1. HETAC**: Officially recognised as a public body.
- **2. EVA**: Officially recognised as a public body.
- **3. HSA**: Officially recognised as a public body.
- **4. OAQ**: Officially recognised as a public body.
- **5. ANECA**: Officially recognised as a public body.
- **6. AQU**: Officially recognised as a public body.

**3. Activities**
- **1. HETAC**: Has and will undertake internal quality assurance activities on a regular basis.
- **2. EVA**: Has and will undertake internal quality assurance activities on a regular basis.
- **3. HSA**: Has and will undertake internal quality assurance activities on a regular basis.
- **4. OAQ**: Has and will undertake internal quality assurance activities on a regular basis.
- **5. ANECA**: Has and will undertake internal quality assurance activities on a regular basis.
- **6. AQU**: Has and will undertake internal quality assurance activities on a regular basis.

**4. Resources**
- **1. HETAC**: Has competent staff, sufficient internal and financial resources.
- **2. EVA**: Has competent staff, sufficient internal and financial resources.
- **3. HSA**: Has competent staff, sufficient internal and financial resources.
- **4. OAQ**: Has competent staff, sufficient internal and financial resources.
- **5. ANECA**: Has competent staff, sufficient internal and financial resources.
- **6. AQU**: Has competent staff, sufficient internal and financial resources.

**5. Mission statement**
- **1. HETAC**: Mission statement is contained in a public document.
- **2. EVA**: Mission statement is contained in a public document.
- **3. HSA**: Mission statement is contained in a public document.
- **4. OAQ**: Mission statement is contained in a public document.
- **5. ANECA**: Mission statement is contained in a public document.
- **6. AQU**: Mission statement is contained in a public document.

**6. Independence**
- **1. HETAC**: Independence mentioned in legislation and reflected in the evaluation reports.
- **2. EVA**: Independence mentioned in legislation and reflected in the evaluation reports.
- **3. HSA**: Independence mentioned in legislation and reflected in the evaluation reports.
- **4. OAQ**: Independence mentioned in legislation and reflected in the evaluation reports.
- **5. ANECA**: Independence mentioned in legislation and reflected in the evaluation reports.
- **6. AQU**: Independence mentioned in legislation and reflected in the evaluation reports.

**7. External quality assurance activities (as in ESG Part 2)**
- **1. HETAC**: Independent external quality assurance processes used and well documented.
- **2. EVA**: Independent external quality assurance processes used and well documented.
- **3. HSA**: Independent external quality assurance processes used and well documented.
- **4. OAQ**: Independent external quality assurance processes used and well documented.
- **5. ANECA**: Independent external quality assurance processes used and well documented.
- **6. AQU**: Independent external quality assurance processes used and well documented.

**8. Accountability procedures**
- **1. HETAC**: Subject to review under the provisions of the Universities Act.
- **2. EVA**: Subject to review under the provisions of the Universities Act.
- **3. HSA**: Subject to review under the provisions of the Universities Act.
- **4. OAQ**: Subject to review under the provisions of the Universities Act.
- **5. ANECA**: Subject to review under the provisions of the Universities Act.
- **6. AQU**: Subject to review under the provisions of the Universities Act.

*Cf. Chapter 3 for the formulation of the standards.*

**Note:**
- *HETAC*: Higher Education and Training Commission of Ireland
- *EVA*: External Quality Assessment
- *HSA*: Higher Education Authority
- *OAQ*: Organisation for Accreditation in Quality Assurance
- *ANECA*: Accreditation National Council
- *AQU*: Accreditation National Council

**Technical note:**
- *All agencies have received or are currently undertaking internal quality assurance activities on a regular basis.*
- *All agencies have competent staff, sufficient internal and financial resources.*
- *All agencies have mission statements that are contained in public documents.*
- *All agencies are independent of external interference, as required by law.*
- *All agencies have accountability procedures that are subject to review under the provisions of the Universities Act.*
As shown in the table above, the focus of the reports varies considerably, as well as the degree to which the standards are specified and discussed. This can be the result of the different objectives, role and activities of the agencies themselves, it can be the result of very different review committees focusing on different aspects of the work of the agencies, or it may simply be the result of guidelines and standards that opens up for different interpretations. Regardless, the point is still that the ESG – in practice – seem to function more as guidelines than firm requirements. Moreover, all reviewed agencies obtained full membership of ENQA, showing that the standards are flexible enough to include a wide variety of agencies with different accountabilities, practices and mandates. ENQA itself emphasises that the ‘standards and guidelines are designed to be applicable to all higher education institutions and quality assurance agencies in Europe, irrespective of their structure, function and size, and the national system in which they are located’.  

A more thorough discussion of the standards is found in a report published by the Nordic Quality Assurance Network in Higher education. The report concludes that although the Nordic agencies have a very high level of compliance with the intentions behind the standards, specific operations and circumstance of minor importance may still question the compliance with specific standards. National legislation concerning the role of an agency in the follow-up on external assurance processes is among the identified problems. In general, the Nordic report expresses a much more ‘strict-compliance’ understanding of the standards (and guidelines) than recent practice around Europe seems to endorse.


3 Assessment

Below follows the evaluations team’s assessments of how NOKUT conforms to the European standards for external quality assurance agencies and thereby meets the membership criteria of ENQA (European standards and guidelines for external quality assurance agencies).

3.1 Use of external quality assurance procedures for higher education

European Standard 3.1

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

<table>
<thead>
<tr>
<th>European Standard</th>
<th>NOKUT’s practice</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Standard 2.1: Use of internal quality assurance procedures</strong></td>
<td>The basic cyclical element in the NOKUT tool-box is evaluation of the institutions’ internal quality assurance systems (quality audits), designed to ensure that the institutions fulfill Part 1 of the ESG as well as the criteria defined by the Ministry and NOKUT. The relevant documentation/links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1. The functioning of the quality audits is described and assessed in the second evaluation report (Report 2, NOKUT’s national role).</td>
</tr>
<tr>
<td><strong>2.2: Development of external quality assurance processes</strong></td>
<td>The aims and objectives of quality assurance processes are defined in Ministerial regulations and further elaborated by NOKUT, after external hearing processes. The relevant documentation/links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1.</td>
</tr>
<tr>
<td><strong>2.3: Criteria for decisions</strong></td>
<td>Decisions are based on explicit published criteria and when making decisions the NOKUT board attempts to obtain consistency across evaluation panels. The relevant documentation/links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1. Consistency is discussed in the second evaluation report (Report 2, NOKUT’s national role).</td>
</tr>
<tr>
<td><strong>2.4: Processes fit for purpose</strong></td>
<td>Processes fit for purposes are a main objective for NOKUT’s various quality assurance processes, and NOKUT operates with a set of different evaluation instruments to fit its various tasks. Alternatives to NOKUT’s extensive set of instruments for quality assurance are discussed in the second evaluation report (Report 2, NOKUT’s national role).</td>
</tr>
<tr>
<td><strong>2.5 Reporting</strong></td>
<td>Evaluation reports are published on the NOKUT website. Most of them are based on templates with defined space for criteria, conclusions and recommendations, and it is easy to get an overview of the content. The relevant documentation/reports are available at NOKUT’s website.</td>
</tr>
<tr>
<td><strong>2.6: Follow-up procedures</strong></td>
<td>There are predefined follow-up procedures if a quality system, study programme or institution is not approved. Approval entails no follow-up except that cyclical audits and revision of accreditation provide for the more long-term follow-up. The relevant documentation/links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1.</td>
</tr>
<tr>
<td><strong>2.7: Periodic reviews</strong></td>
<td>Evaluations of the institutions’ internal quality assurance systems (quality audits), is undertaken on a cyclical basis. All institutions are to be audited every</td>
</tr>
</tbody>
</table>

Documentation
Programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Sixth year (more often if their quality assurance system is not approved). NOKUT is currently completing the first round of audits and planning the second round. The relevant documentation/links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1.

### 2.8: System-wide analyses

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

NOKUT has recently established a Unit for Analysis and Development to undertake more system-wide analysis. So far no reports summarising findings from NOKUT’s audits, accreditations or evaluations have been produced. Documentation was provided during the panel’s visit to NOKUT.

### Conclusion

The evaluation team concludes that NOKUT’s design of external quality assurance processes to a high degree are based on ideas fully in compliance with those described in Part 2 of the European Standards and Guidelines.

### 3.2 Official status

**European Standard 3.2**

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

### Documentation

NOKUT’s role and tasks are defined in the Norwegian Act relating to universities and university colleges (cited in Section 1.1 of this report), and its responsibility for external quality assurance in Norwegian higher education has a clear legal basis. The relevant documentation or links to documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1.

### Conclusion

The evaluation team concludes that NOKUT has an established legal basis and is formally recognised by a competent public European authority as an agency with responsibilities for external quality assurance – fully compliant with Standard 3.2.

### 3.3 Activities

**European Standard 3.3**

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.
**Documentation**

NOKUT’s prime activity is quality assurance of higher education, including audits of institutional quality assurance systems, accreditation and reaccreditation, as well as general evaluations to assess quality. These are all on a regular basis (the quality audits are also cyclical). The relevant documentation or links to documentation are provided at NOKUT’s website and in NOKUT's self-evaluation report Part 1. The various activities are described and assessed in the second evaluation report (Report 2, NOKUT’s national role).

**Conclusion**

The evaluation team concludes that NOKUT undertakes external quality assurance activities on a regular basis and fully complies with Standard 3.3.

### 3.4 Resources

**European Standard 3.4**

*Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.*

**Documentation**

NOKUT obtains its funding from the Ministry of Education and Research (total expenses in 2006 were NOK 42.8 million). Human resources include 49 persons of which 46 have a permanent position and 70 percent have higher education at Master degree-level or higher (NOKUT Annual Report for 2006). Both human and financial resources are adequate and enable NOKUT to undertake a wide range and high number of quality assurance activities directed at Norwegian higher education. Major challenges concerning resources, include heavy work-loads resulting partly from to some extent unforeseeable, application-driven tasks (accreditation of study programmes as requested by higher education institutions) and partly from large evaluation tasks defined from outside NOKUT (general evaluations demanded by the Ministry). Except for this NOKUT is free to plan and organise its quality assurance activities, resources and development activities, and seems to have been able do so both adequately and efficiently.

The relevant documentation is provided in NOKUT’s self-evaluation report Part 1 and Part 2. NOKUT’s competences and resources are discussed in the second evaluation report (Report 2 on NOKUT’s national role). Conclusions are furthermore based on the evaluation team’s visit to NOKUT, interviews with stakeholders and surveys to panel members and evaluated institutions.
Conclusion

The evaluation team concludes that NOKUT has adequate human and financial resources to organise and conduct quality assurance of Norwegian higher education – fully compliant with Standard 3.4.

3.5 Mission statement

European Standard 3.5

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Documentation

NOKUT’s mission is defined in the Act relating to universities and university colleges (cited in Section 1.1 above), and elaborated in NOKUT’s strategic plan (2004) which is published at NOKUT’s website. The Act clearly states NOKUT’s tasks, objectives and authority. Links to the relevant documentation are provided at NOKUT’s website and in NOKUT’s self-evaluation report Part 1.

Conclusion

The evaluation team concludes that NOKUT tasks, objectives and authority are clearly, explicitly and publicly stated – fully compliant with Standard 3.5.

3.6 Independence

European Standard 3.6

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Documentation

The Norwegian Act relating to universities and university colleges states that ‘NOKUT shall be a professionally autonomous state body’, and that ‘The Ministry may not instruct NOKUT beyond what is authorized by statute or laid down in regulations issued by the Ministry, and may not set aside accreditations granted by NOKUT.’ The regulations state that the Ministry may order NOKUT to conduct ‘significant evaluations in order to be able to assess the quality of higher education’ (Regulations no. 1040 of 8 Sept 2005, Comments to §1–3). So far the Ministry has ordered three such evaluations. NOKUT’s tasks are laid down in the regulations in quite some detail, setting clear limits to the professional discretion of the agency, but it is
also made clear that no third party or the Ministry may interfere with NOKUT’s professional decisions, such as appointing expert panels and organising evaluations, even when the evaluations are ordered by the Ministry.

NOKUT’s Board of Governors has the overall responsibility for NOKUT’s activities and decisions. The Board is appointed by the King in Council and consists of 8 members, including one student member and one member appointed from NOKUT’s staff. None of the members may hold a leading position or office at any Norwegian higher education institution, and there are no government representatives on the Board.

**Conclusion**

The evaluation team concludes that NOKUT is an independent state body with autonomous responsibility for its operations and that the conclusions and recommendations made in NOKUT’s accreditation, evaluation and audit reports are the sole responsibility of the appointed experts – fully compliant with Standard 3.6.

### 3.7 External quality assurance criteria and processes used by the agencies

**European Standard 3.7**

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

**Criteria and processes and documentation**

The criteria and standards used in NOKUT’s external quality assurance are defined partly in a regulation by the Ministry and partly in regulations issued by NOKUT. The processes and procedures used are pre-defined and published at NOKUT’s website. All kinds of evaluations, audits and accreditations are performed by external expert panels appointed by NOKUT and there is always a publicly available report produced, presenting the assessments, outcomes and recommendations.

The details of the processes vary dependent on the evaluation instrument. The panels for the audits of the institutions’ internal quality assurance system, institutional accreditations,
reaccreditations and general evaluations always contain student members and the panels visit the institutions. For accreditations of study programmes, all panel members are required to have academic competence and the specific requirements to evaluators, as well as to the programme, relate to the nature of the study programme. Site visits are required for the PhD-programme accreditations, not for Master or Bachelor programmes. There are some questions regarding the independence of some evaluation team members. Admittedly, it is difficult to find fully independent experts especially if understanding of Norwegian is required, and the survey and interviews revealed incidence of bias among evaluation team members.

The kind of written input required from the institution under review also varies. For the quality audits the institutions are required to submit materials documenting their quality assurance system, including their annual quality reports. For the accreditation of study programmes and institutional accreditations, the institution is required to write an application as described in NOKUT’s applicant handbook. For the reaccreditations and the general evaluations on the other hand, there are regular self-assessment processes in advance of the panel’s assessments.

There are predefined follow-up procedures/sanctions when a quality system, study programme or institution is not approved. For example, when a quality assurance system does not pass the audit there is an immediate procedure for a second audit. Approvals, on the other hand, entail no follow-up procedure organised by NOKUT. The responsibility for following up the recommendations of the positive reports is a responsibility for the institutions themselves. The cyclical audits and revision of accreditation still prepare for long-term follow-up by NOKUT.

Negative decisions concerning accreditations or the audits of quality control systems may be appealed. Appeals are handled by an Appeal Board appointed by the Ministry of Education and Research. The scholarly judgements may not be appealed against, only the case processing.

The relevant documentation or links to documentation concerning the issues above are provided at NOKUT’s website and in NOKUTs self-evaluation report Part 1. NOKUT’s practice is also described under Standard 3.1 above, as well as in the second evaluation report (Report 2, NOKUT’s national role).

**Conclusion**

The evaluation team concludes that NOKUT’s criteria and procedures are pre-defined and publicly available and that the processes are compliant with Standard 3.7. We note however that the quality improvement and follow-up function are underutilised. Avoidance of bias on the part of evaluators has not always been guaranteed.
3.8 Accountability procedures

*European Standard 3.8*

*Agencies should have in place procedures for their own accountability.*

**Documentation**

NOKUT’s internal quality assurance system is defined in a separate, publicly available document.\(^{13}\) The document states six general aims of NOKUT’s quality assurance system:

- the work is carried out in accordance with approved procedures and guidelines
- procedures and guidelines for the work are in accordance with recognised international practice in the area
- the work is carried out with consistency and equal treatment
- the work is carried out independently of stakeholders
- the work is carried out with openness and clear communication externally
- the work is carried out so that external parties can benefit from process and result

The quality system includes procedures and guidelines for the quality work in the operating units as well as annual quality assessments and external feedback mechanisms\(^{14}\). There are also procedures to prevent conflicts of interest. The relevant documentation is provided at NOKUT’s website and in NOKUTs self-evaluation report Part 1 (links as in footnotes above); this openness of documentation and procedures provides additional assurance of quality in itself.

**Conclusion**

The evaluation team concludes that NOKUT has in place accountability procedures fully compliant with Standard 3.8.


4 Conclusions and recommendations for future improvements

The evaluation team concludes that NOKUT fully complies with ENQA’s membership requirements. However, this does not mean that NOKUT has no room for improvement. Even when complying with the standards, there are some main issues relating to the standards the evaluation team would recommend NOKUT to focus on for future development:15

- Although NOKUT is an independent agency, it could be argued that there are clear limits to this autonomy. When considering the laws and regulations guiding NOKUTs work, objectives and activities, these are quite detailed and on some issues leave little room for NOKUT as a professional agency. It should also be pointed out that quite detailed laws and regulations makes flexible and fitness-for-purpose approaches more difficult to apply. The Ministry and NOKUT should evaluate the current regulations with the aim of increasing the flexibility and appropriateness of the agency’s operations.

- Concerning the resource situation NOKUT is adequately supplied, but if a further increase in work-load appears in the near future, the agency may face a situation of insufficient staff resources. In this situation it can be recommended that NOKUT – together with the Ministry – engage in a discussion of what should be the prioritised evaluation tools and activities for the future. The evaluation team would recommend a transformation of evaluation instruments and their functioning.

- The data collected through the evaluation of NOKUT suggests that the agency is much associated with control activities, and less with institutional and academic development. The evaluation team would recommend NOKUT to find a better balance between control and improvement for the future.

- Given the diverse landscape of study programmes in Norway, NOKUT should also consider developing more differentiated sets of accreditation criteria for different kinds of study programmes (e.g. different criteria for academic vs. professional study programmes). The formulation and relevance of the criteria used by NOKUT should also be looked into since past evaluations and accreditations seems to have created considerable confusion about how certain criteria should be interpreted, and the relative importance of certain criteria.

- There should be more efforts to avoid conflicts of interest among external reviewers related to other issues than institutional affiliation (e.g. affiliation to competing programmes/institutions or scholarly bias).

- Finally, the evaluation team would also point out that NOKUT could improve their accountability function. NOKUT has initiated some important activities including an annual conference for the sector. Still, the evaluation team thinks that NOKUT could contribute more on the critical issue concerning the quality of Norwegian higher

15 The recommendations are elaborated in Report 2.
education. The new Analysis and Development unit is a promising step in this regard, especially if its activities are related to bring about more information on the characteristics, substance, strengths and weaknesses of higher education in Norway.
Appendix 1  Terms of Reference


1.2 About the Evaluation of NOKUT
The Norwegian Ministry of Education and Research has decided that an evaluation of NOKUT will be carried out in 2007. The evaluation has two objectives: The first objective is to examine whether NOKUT meets the “Standards and Guidelines for Quality Assurance in the European Higher Education Area”16 adopted by the Ministers responsible for higher education in the member states of the Bologna process in Bergen in May ’05. The second objective is to evaluate the national role of NOKUT in the Norwegian educational system. Separate reports should be written for each of these objectives. It is not possible to submit a proposal on only one of the parts of the evaluation.

The following areas should be taken into consideration in the evaluation: NOKUT’s purpose, mandate and strategy, NOKUT’s organisation and management, NOKUT’s expertise and results, and NOKUT’s methodology and procedures. Furthermore, it is of special interest to examine how NOKUT balances its responsibility for quality assurance i.e. its supervisory and control functions with its responsibility for developing a quality culture in education. The evaluation should also examine how NOKUT understands its own mission and responsibility, given in Act no. 15 of 1 April 2005 relating to universities and university colleges.

1.3 About NOKUT
NOKUT was established by the Norwegian Parliament, Stortinget, in 2002 and commenced its activities as from 1 January 2003. NOKUT is an independent government agency. The purpose of NOKUT is to supervise and help develop the quality of higher education, and, since 2004, other post-secondary vocational training in Norway at ISCED 4 level. This is done through evaluations, as well as through accreditation and recognition of quality assurance systems, institutions and course provisions.

In addition, NOKUT processes individual applications for general recognition of foreign

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higher education qualifications. As the Norwegian ENIC-NARIC centre, NOKUT is also responsible for providing foreign institutions and partners with information about the Norwegian educational system, and the system for recognition of foreign higher education qualifications. NOKUT is a member of the European Association for Quality Assurance in Higher Education (ENQA). NOKUT employs some 50 staff and is headed by a board composed of seven members who hold the overall responsibility for the operations and the decisions taken. It has an annual budget of around 40 M NOK.

The basis of NOKUT’s activities is stated in Act no. 15 of 1 April 2005 relating to universities and university colleges Chapter 2 and § 3-1, with corresponding regulations, and Act no. 56 of 20 June 2003 relating to post secondary vocational training section 2, with corresponding regulations.

1.4 The Contract Notice
This document contains administrative conditions and award criteria for the procurement. The contractual terms will be available by 12 April 2007.

2 Description of the procurement

2.1 Description of the evaluation
The following elements should be considered in the evaluation:

NOKUT’s Purpose, Mandate and Strategy
It should be evaluated whether:
- NOKUT’s strategies and goals are clearly formulated
- NOKUT’s strategy, goals and activities correspond to the purposes and activities outlined in section 2-1 of Act no. 15 of 1 April 2005 relating to Universities and University Colleges and in section 2 of Act no. 56 of 20 June 2003 relating to Vocational Post-Secondary Education.
- NOKUT meets the membership criteria of ENQA.
- NOKUT has a consistent understanding of its supervisory functions.

Organisation and Management
It should be evaluated whether:
- NOKUT’s system of organisation and management facilitate the professional and efficient running of the agency’s activities
- NOKUT is an attractive workplace that manages to attract and retain qualified staff
- NOKUT disseminates information and communicates with stakeholders and the general public in a clear and transparent manner.
- NOKUT acts independently from the Ministry within its legal mandate.
- NOKUT manages to balance its responsibility for assuring quality with its responsibility for developing quality.

**NOKUT’s Qualifications**

It should be evaluated whether:
- NOKUT possesses sufficient expertise to fulfil its purposes in an efficient manner.
- NOKUT brings in external expertise when this is needed and/or desirable and routinely assures itself of the quality of these external contributions.
- NOKUT uses expert panels efficiently and sensibly.
- NOKUT has developed sound procedures for appointing qualified members to the panels of experts, thereby securing the necessary expertise for each exercise of recognition, evaluation and accreditation.

**NOKUT’s Performance**

It should be evaluated whether:
- NOKUT’s methods and procedures are fit for purpose, well defined and easily accessible.
- NOKUT’s procedures facilitate continuous feedback regarding the quality of the agency’s own operations and results.
- NOKUT’s criteria for evaluation and accreditation are fit for.
- NOKUT has sound procedures for the recognition of foreign higher education and for other vocational post-secondary education.

**NOKUT’s Results**

It should be evaluated whether:
- NOKUT’s regulations, methods and reports represent an efficient and cost-effective use of resources.
- NOKUT’s set of priorities and achieved results reflect the agency’s objectives, strategy and activities.
- NOKUT contributes substantially to assuring and developing the quality of Norwegian higher education institutions and other post-secondary vocational education (ISCED 4).
Appendix 2 Overview of the evaluation team’s site visits and interviews

A Visits to institutions with experiences from NOKUT audits, evaluations and accreditations

In total 56 persons were interviewed at these site visits: 31 persons representing the institutional leadership and administration, 10 students and 15 members of academic staff.

University of Oslo, UiO (1 Oct 07)
Bodø University College, HiBo (2 Oct 07)
MF Norwegian School of Theology (3 Oct 07)
Folkeuniversitetet Adult Education Association (3 Oct 07)
Norwegian University of Life Sciences, UMB (4 Oct 07)
Akershus University College, HiAk (4 Oct 07)

B Visit to NOKUT

In total 33 persons were interviewed (and 9 of them twice):
28 NOKUT staff members and leadership
2 student representatives in NOKUT Board/the Appeal Board
3 other external Board members

20th of November
09.00 – 10.00 Meeting with Oddvar Haugland and the 4 members of the group preparing the self-evaluation report(s)
10.00 – 10.45 Meeting with Head of the Quality Audit Unit, Jon Haakstad
11.00 – 12.30 Meeting with staff of Quality Audit Unit (4 persons)
13.15 – 14.00 Meeting with Head of the Accreditation Unit, Tove Blytt Holmen
14.00 – 15.00 Meeting with staff in the Accreditation Unit (higher education, 6 persons)
15.15 – 16.15 Meeting with staff in the Accreditation Unit (tertiary vocational education, 3 persons)
16.15 – 17.30 Meeting with Chair and members of NOKUT Board (Petter Aaslestad; Ragnhild Kvålshaugen; Per Arne Syrrist; Mikael Strand; Wenche Frostad)

21st of November
09.00 – 09.45 Meeting with Head of external communication Dorte Birch, and Head of administration Per Øyvind Mathisen in NOKUT
09.45 – 10.15 Meeting with head of the International Recognition Unit, Ida Lønne
10.15 – 11.00 Meeting with the staff in the International Recognition Unit (8 persons)
11.15 – 11.45  Meeting with the Research and Analysis Unit (2 persons)
11.45 – 12.30 Meeting with Secretary of the two Appeal Boards Eva Liljegren and one student member of the Appeal Board for Higher Education (Øistein Østtveit Svelle, StL)
13.30 – 15.30 Closing meeting with the NOKUT leadership (Oddvar Haugland, Jon Haakstad, Tove Blytt Holmen, Ida Lønne)

C  Interviews with stakeholders

All interviews were conducted at NIFU STEP’s location in Oslo. In total 18 persons were interviewed.

Programme evaluation team interviews 22nd November 2007
09.00 – 10.00 Meeting with the Ministry of Education and Research (KD), Department of Higher Education
   Toril Johansson, Director General
   Lars Vasbotten, Section for Ownership and Governance
   Marie Wien Fjell, Section for Budget and Finance
   Tone Flood Strøm, Section for Higher Education Structure and Quality Assurance
10.00 – 11.30 Meeting with the Norwegian Association of Higher Education Institutions (UHR) and the Network for Private Higher Education Institutions (NPH)
   Jarle Aarbakke, Chair UHR
   Ola Stave, Secretary General UHR
   Guri Bakken, Deputy Secretary General UHR
   Vidar L Haanes, Chair NPH
   Jan Duvaland, NPH
12.15 – 13.30 Meeting with the National Union of Students (NSU), the Norwegian Association of Students (StL), and the Association of Norwegian Students Abroad (ANSA):
   Knut Høgetveit, NSU
   Sine Halvorsen, StL
   Maria Christensen, StL
   Anders Fjelland Bentsen, President ANSA
   Elin Kollerud, Head of ANSA Information Centre
13.30 – 14.30 Meeting with the Norwegian Association of Researchers (Forskerforbundet):
   Kari Kjenndalen, Secretary General
   Sigrid Lem, Deputy Secretary General

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15.00 – 16.00 Meeting with the Business Association of Norwegian knowledge- and technology based enterprises (Abelia):
  Knut Erik Beyer-Arnesen, Chair Forum for Vocational Schools

Additional interviews
Kjell Frønsdal, Chair of the NOKUT Appeal Boards, was interviewed by Liv Langfeldt 29 Nov. 07.