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### **Follow-up report - Norwegian Agency for Quality Assurance in Education's response to ENQA's recommendations**

The Norwegian Agency for Quality Assurance in Education (NOKUT) hereby submits the Follow-up report to ENQA's Board of Directors.

We would like to thank ENQA for the opportunity to have a digital progress visit on April 3<sup>rd</sup>. The progress visit was very useful.

The Board of NOKUT was informed about the follow-up report on June 11<sup>th</sup>.

Yours sincerely

Øystein Lund  
Acting Director General

Hege Brodahl  
Acting Deputy Director General

*This document has been signed electronically*

Copy: ENQA - European Association for Quality Assurance in Higher Education v/Goran Dakovic

Attachments: NOKUT Follow-up report\_ENQA

4 / 2020

# REPORT

2020

## **Follow-up report**

Norwegian Agency for Quality Assurance in Education's  
response to ENQA's recommendations



**NOKUT** (Norwegian Agency for Quality Assurance in Education) is an independent government agency under the Ministry of Education and Research.



**NOKUT's** social mission, tasks and role as an independent expert body is described in the Universities and University Colleges Act and is further specified in Ministerial Regulations. In addition, NOKUT performs administration responsibilities on behalf of the ministry.



**NOKUT's** purpose is to ensure and promote quality in education by:

- supervising, providing information about, and contributing to the development of quality in Norwegian higher education and tertiary vocational education
- recognising and providing information about foreign education, as well as providing information about the opportunities for recognising foreign education and qualifications in Norway



**NOKUT's** work is intended to contribute to society at large having confidence in Norwegian higher education and tertiary vocational education and recognised foreign education.



Every year, around 900 experts are involved in quality assurance, evaluation, accreditation and recognition of foreign educational courses and projects on behalf of NOKUT.

For more information about our work, please go to our website: [nokut.no](http://nokut.no)



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## Introduction

NOKUT is an independent expert body organised under the Ministry of Education and Research. NOKUT's remit and tasks are defined in the Act Relating to Universities and University Colleges and the Act Relating to Tertiary Vocational Education, with pertaining regulations issued by the Ministry of Education and Research.

NOKUT supervises almost 4,000 study programmes at about 140 institutions in Norway. We do this to ensure that all study programmes at Norwegian universities, university colleges and tertiary vocational education institutions are of satisfactory quality, that as many programmes as possible are outstanding, and that the public is well-informed about the status of educational quality in the sector. As Norway's ENIC/NARIC centre, NOKUT is also responsible for general recognition of foreign education.

Quality assurance in Norwegian higher education is a dual responsibility. All HEIs are responsible for the quality of their own educational provisions, and it is NOKUT's responsibility to ensure that all institutions follow the legal requirements and provide education of high quality.

In 2018, NOKUT was reviewed against the new Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015). The external review panel appointed by the European Association for Quality Assurance in Higher Education (ENQA) found that NOKUT was fully compliant with most of the areas in the ESG. The panel found that NOKUT was only partially compliant with ESG 2.3 implementing processes and partially with 3.4 Thematic analyses. On 21 June 2018, the Board of ENQA agreed to confirm the NOKUT membership of ENQA for five new years.

The panel report by the ENQA review panel identified two main recommendations for NOKUT:

- NOKUT should implement the plans for follow-up in the 3rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented. NOKUT should also consider introducing a follow-up procedure for programme accreditations.
- The panel recommends that NOKUT completes and publishes the two meta-analyses of institutional audits and programme accreditations, and implements its plan to publish regular meta-evaluations of their own work. In addition to the meta-evaluations, it would be of specific interest to HEIs to publish summarised findings of NOKUT's evaluations also as separate reports, and not only as part of wider analytical exercises. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3rd cycle of audits.

NOKUT had a voluntary, digital progress visit from two ENQA experts on April 3<sup>rd</sup> 2020 to discuss a draft of the follow-up report. The progress visit was very useful and the experts gave us good advice for further development of our organization and activities.

The table on the following page describes the panel's recommendations and NOKUT's actions to address them.

## Follow-up recommendations and actions taken by NOKUT

Conclusion	Panel recommendation	Actions taken by NOKUT
<p><b>ESG 2.3</b>  <b>Implementing processes</b></p> <p><i>Partially compliant</i></p>	<p>NOKUT should implement the plans for follow-up in the 3rd cycle of audits while making sure that there is some form of checking if and how the recommendations from the previous cycle had been implemented.</p>	<p><b>NOKUT’s follow-up-steps</b></p> <p>NOKUT’s external quality assurance procedures are linked to legal requirements. The Academic Supervision Regulations (NOKUT, 2017) that set out requirements for the institutions’ systematic quality assurance practices are central. In accordance with these and other requirements, NOKUT carries out periodic supervision of the institutions’ systematic work to assure and enhance the quality of the education they offer. Each institution must go through an audit process every 6-8 years, and in order to pass, the institutions must fulfil each requirement. The way that NOKUT facilitates follow-up of the institutions during and after such audits include an <i>accountability step</i>, an <i>enhancement step</i> and, from 2020, a <i>development step</i>.</p> <p><b>The accountability step</b></p> <p>The accountability step safeguards that students, applicants and the society in general can have trust in the quality work of Norwegian Higher Education Institutions. If an institution meets the legal requirements in a satisfactory manner (full compliance), follow-up is taking place within the <i>enhancement</i> step. However, if an institution does not comply with the legal requirements, the NOKUT board will demand that the institution makes specific corrections in line with the expert panel’s report, and hence follow up on the institution until all legal requirements are fulfilled. The deadline for the institution to submit new documentation can vary between three months and a year, depending on whether there is non-compliance, partial compliance or substantial compliance with the legal requirements. NOKUT’s follow-up method varies accordingly: if the failures to comply with the legal requirements are not that severe, the experts do an additional review only by reading and discussing the documentation, but if the institution fails to comply with the requirements (non-compliance), the experts go on a site visit as well. Normally, an institution achieves full compliance after the correction process, but if not, NOKUT decides which other measures to use in order to follow up on the institution’s educational quality. This could include revisions of accredited study programmes, or a revision of the institutional accreditation as such. The accountability step secures that an institution is followed up by NOKUT until there is full compliance with all legal requirements.</p>

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		<p><b>The enhancement step</b>  The enhancement step includes recommendations from the expert committee to the institutions – it is simply a paragraph that the expert panel adds to their report. The recommendations are suggestions from the committee on how the institutions can further improve their quality work, and do not influence the conclusion of the audit. It is necessary to bear in mind that NOKUT’s understanding of “recommendations” as <i>advice</i> and <i>suggestions</i> seems to be culturally situated; it might even be a Nordic understanding of the term. This means that the institutions can choose for themselves whether and how to follow up on the recommendations given by the committee. Moreover, NOKUT will <i>not</i> check how the recommendations are followed up in the next audit. This way, the enhancement step give the institutions some suggestions of how to go above and beyond the minimum standards required by the law, and in this way inspire them to continue and also develop their quality work.</p> <p>Consequently, follow-up of the previous cycle (the second cycle), understood as checking if and how recommendations were implemented, is carried out in this way according to NOKUT’s methodology: as described above, recommendations as severe as non-compliance are rather described as demands for corrections. These are systematically followed up by NOKUT. Recommendations that are advice for enhancement are only suggestions, and these have previously not been followed up on. However, this is about to change in the third cycle, as NOKUT now introduces the development step described in the following paragraph.</p> <p><b>The development step - follow-up in the third cycle</b>  According to ESG (2015) standard 2.3, EQA processes carried out by NOKUT should include “a consistent follow-up”. The guidelines state that such a process should consider the action taken by the institution. They also state that the nature of the follow-up will depend on the design of the external quality assurance.</p> <p>In order to comply with this standard, NOKUT has included a development step in the methodology for quality audits, in addition to the steps concerning accountability and enhancement. The development step is designed to stimulate learning and reflection from the review process, and should take place 2-3 years after the NOKUT Board’s approval. Since NOKUT’s third cycle spans from 2017 to 2024 – with the pilot carried out in 2017-2018 – a first follow-up for the pilot institutions is scheduled in 2020. Due</p>

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		<p>to the corona pandemic, the workshop scheduled for 17 June will be carried out digitally. Before going into how we will organize the follow-up, we describe the set-up of the third cycle of quality audits, which we hope to benefit from when we do follow-up activities.</p> <p>An important change made in the third cycle is that the institutions are organised in groups, according to their characteristics. Institutions that have recently merged, institutions with several campuses, institutions with the same authorizations, or institutions offering education within the same professions or disciplines, are examples of how NOKUT has chosen to set up “audit heats”. There are 4-6 institutions in each audit heat. Both during and after the audits, the institutions are encouraged to discuss and share experiences about their quality work. NOKUT believes that such activities have the potential to bring forth mutual inspiration within quality work. In order to foster collaboration and sharing, NOKUT arranges an information meeting for each audit heat 3-4 months before the deadline for submitting the documentation. The intention is that these activities should facilitate further networking and contact between the institutions.</p> <p>Hence, the follow-up activities we are planning is ideally a prolongation of the already established collaborative and shared space within an “audit heat”, where the aim of the follow-up is to let the institutions share how they have worked with the committees’ recommendations. The follow-up activities for each “audit heat” will consist of:</p> <ul style="list-style-type: none"> <li>- a follow-up workshop</li> <li>- a written summary, including comparisons and reflections on compliance, as well as reflections on the institutions’, the experts’ and the NOKUT team’s evaluations – looking at well-functioning aspects as well as areas of further improvement</li> </ul> <p>A survey was distributed to the pilot institutions in order to gather their ideas about how to design a useful and valuable workshop, and summaries of the pilot, heat 1 and 2 are ready (see attachments). After we have evaluated the workshop for the pilot institutions, we will decide on how to proceed with the following heats. If the workshop format is approved, there will be one such workshop for each audit heat over the next years.</p>

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	<p>NOKUT should also consider introducing a follow-up procedure for programme accreditations.</p>	<p>NOKUT has previously made attempts of doing follow-ups of programme accreditations, which we found not to be very useful for the institutions. Since the last ENQA-review, NOKUT has considered introducing a new follow-up procedure for programme accreditations. This is part of a larger project as we are currently working on renewing our accreditation process. As of today we have not yet finalized the project, but we are working on new ideas. Here are some of the measures taken and our reflections made so far.</p> <p>NOKUT-accredited study programmes cover only a small portion of students and study programmes in Norway, since most institutions in Norway have obtained full accreditation rights. This means that they are accrediting their own study programmes. Taking into consideration the nature of the higher education sector, NOKUT is reluctant to tie up too much of its resources in a heavy ex-ante accreditation process, which covers only the applicant institutions.</p> <p>A follow-up procedure fit for purpose should therefore be suited to the higher education sector as a whole, including the many institutions with full accreditation rights. Through our audits NOKUT checks that the institutions themselves have mechanisms for ensuring that their study programmes fulfil the national legal requirements. The institutions are themselves responsible for conducting a sort of continuous follow-up of their study programmes. This procedure was introduced in 2017 and has been implemented in the 3<sup>rd</sup> cycle of audits.</p> <p>We are also considering other ways to implement a consistent follow-up of the programmes NOKUT accredit. At the time of the ENQA review in 2018, NOKUT was working on new ideas for initial accreditation through “Project new accreditation process”. We had identified some limitations in our current process. We considered it to be too heavily based on ex-ante accreditation, the institutions were granted unlimited accreditation and we lacked consistent follow-up procedures. The institutions also criticized NOKUTs accreditation process for being too time-consuming. NOKUT therefore wanted to make the process more efficient and more fit for purpose. The new model was supposed to be adapted to applications for bachelor, master and vocational education programmes.</p> <p>The project started out with a mapping of other European accreditation systems and a study trip to two selected European agencies to discuss our ideas (EKKA in Estonia and QQI in Ireland). The project also had stakeholder involvement from the higher education sector and the</p>

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		<p>vocational education sector (we appointed a reference group). NOKUT presented its suggestion for a new accreditation process to the higher education and vocational education sector in October 2018, and the institutions were invited to comment on the proposed model for accreditation. The model included three steps: Pre-qualification for new applicants (by NOKUT staff), Accreditation (Peer reviewed) and a Follow-up scheme. The follow-up procedure was linked to the institutions' internal control, since all institutions (independent of their accreditation status) are responsible for checking that their study programmes meet all the necessary legal requirements.</p> <p>Based on, in part, the feedback from the institutions, NOKUT has made some alterations to the model. NOKUT decided to test the new model firstly on applications for vocational education programs as most of the applications NOKUT receives come from the vocational education sector. NOKUT launched a pilot for the vocational sector in 2019. NOKUT will evaluate the pilot during 2020, and possibly revise it into a model suited for accreditation of bachelor and master programs. In the following paragraphs, we give an overview of the piloted model, to explain why this approach to ex ante accreditation should enable NOKUT to explore follow-up schemes in the future.</p> <p>The pilot for accreditation of tertiary vocational education programmes is designed for institutions that have prior accreditations. In this pilot, NOKUT targets what we consider to be the core criteria for an ex-ante process, especially</p> <ul style="list-style-type: none"> <li>• learning outcomes</li> <li>• admission requirements</li> <li>• the qualifications of the teaching staff</li> <li>• the teaching staff : student ratio</li> </ul> <p>NOKUT has been able to streamline the peer review process. A panel of four experts (including one student) reviews 5-15 applications and gives their input supported by a preliminary report prepared by NOKUTs caseworker. Based on the administrative preliminary report and the panel's input, NOKUT concludes in each of the applications.</p> <p>The streamlining of the process will enable NOKUT to develop benchmarks for types of programmes, which helps ensure equal treatment of applicants. Also, this model is less costly and time-consuming than our existing accreditation</p>

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		<p>procedure. This will enable NOKUT to reallocate resources to future follow-up of accredited programs.</p> <p>In 2020, NOKUT has continued its work on a risk based approach to quality assurance and quality enhancement by launching a new working group. Its mandate is to establish a system for how NOKUT will work to ensure that our use of measures and resources is efficient and fit for purpose. A risk based approach to quality assurance and quality enhancement within higher education aims to 1) Reduce the risk of low quality in higher education 2) Stimulate quality enhancement within the higher education sector.</p> <p>The idea is to develop a knowledge base that enables NOKUT to assess which study programmes and institutions that might not meet expected quality standards, identify challenges within programmes or areas for enhancement. Based on these assessments NOKUT will decide a follow-up procedure. NOKUT will continue to develop a follow-up scheme within the risk-based framework in 2020.</p>
<p><b>ESG 3.4</b></p> <p><b>Thematic analysis</b></p> <p><b>Substantially compliant</b></p>	<p>The panel recommends that NOKUT completes and publishes the two meta-analyses of institutional audits and programme accreditations, and implements its plan to publish regular meta-evaluations of their own work.</p> <p>In addition to the meta-evaluations, it would be of specific interest to HEIs to publish summarised findings of NOKUT's</p>	<p>NOKUT has completed and published the meta-analyses of the institutional audits conducted in the second cycle from 2009 to 2016. This report is now available on our website<sup>1</sup>. The result of this analysis, together with the experiences and the feedback from stakeholders, have inspired the development and been incorporated in the planning and implementation of the third round of audits. The second report, on programme accreditations, was written for internal purposes, to enhance our procedures, reports, guidance as well as to develop our criteria and regulations.</p> <p>NOKUT has designed a new model for thematic analyses of quality audits. After each “audit heat” (as described above, in 2.3.), findings and reflections from the audits are shared and discussed both internally as well as with the different stakeholders, including the NOKUT board. These findings are used to enhance our methods and processes, and will contribute to analyses of the impact of our procedures (see attachments for examples from the first and second heats). Based on all the audit heats, thus after the third audit cycle, more comprehensive thematic analyses will also be conducted. These will be published and disseminated to the institutions and the wider sector through different means.</p>

<sup>1</sup> NOKUT (2018). *NOKUT's evaluation of institutions' quality assurance systems for educational provision (audit). Summary of analysis of the second round of audits (2009–2016)*. Available: [https://www.nokut.no/globalassets/nokut/rapporter/evalueringer/2018/nokuts\\_evaluation\\_of\\_institutions\\_quality\\_assurance\\_systems.pdf](https://www.nokut.no/globalassets/nokut/rapporter/evalueringer/2018/nokuts_evaluation_of_institutions_quality_assurance_systems.pdf)

Conclusion	Panel recommendation	Actions taken by NOKUT
	<p>evaluations also as separate reports, and not only as part of wider analytical exercises. Such reports should also highlight good practices identified at HEIs. By the time of follow-up, NOKUT should also be able to produce such a report on the basis of the pilot of the 3rd cycle of audits.</p>	<p>When it comes to dissemination of general findings from the external quality assurance activities, evaluations and other activities, NOKUT has for a long time reflected on how good practices in audits, accreditation and evaluations can be disseminated across the Norwegian sector. We have experienced that publishing reports is not the most efficient way to disseminate good practice, share experiences and knowledge, and to inspire change.</p> <p>Even though the ESG standard put emphasis on reports, NOKUT has developed a range of activities to share knowledge and good practices based on empirical and theoretical studies, as well as evaluations of different dissemination activities, previously linked to our Centre for Excellence Initiative, where dissemination of results and good practices was key<sup>2</sup>. Important in all our activities is the understanding and awareness of the contextual importance of quality work and practices. The institutional contexts as well as disciplinary contexts are important in dissemination activities<sup>3</sup>.</p> <p>One example of such dissemination activities is how NOKUT has implemented seminars to share experiences from the audits in order to reflect on the processes, results and good practices, together with the higher education institutions. Such workshops, based on current experiences and results from cycle three, were held in November 2018 and March 2020, and included the sharing of good practices on quality work and quality cultures, student involvement and engagement in quality work. Experiences and good practices are also showcased in the NOKUT podcast<sup>4</sup>.</p> <p>Additionally, NOKUT has recently developed Quality summaries, where the results and experiences from audits and accreditations are coupled with results from NOKUT's other sources of knowledge, such as evaluations and surveys, and presented to the higher education institutions and sector through various means. Online summaries are available on a range of topics such as quality work, assessment, internationalisation, work placements and relevance. These are highly valued by the institutions as well as other stakeholders. In addition to disseminating good practices and sharing reflections among the HEIs, these measures also contribute to analyses of NOKUT's own work.</p>

<sup>2</sup> See for instance Carlsten & Vaabø 2015; Kottman et al. 2016; Kottman et al. 2020.

<sup>3</sup> See for instance Ashwin, P. (2006) *How approaches to teaching are affected by discipline and teaching context*. Or Bråten, H. & Børshheim, A. (2016). *På vei mot det fremste?* NOKUT publication.

[https://www.nokut.no/globalassets/nokut/rapporter/sfu/pa\\_vei\\_mot\\_det\\_fremste\\_2016.pdf](https://www.nokut.no/globalassets/nokut/rapporter/sfu/pa_vei_mot_det_fremste_2016.pdf)

<sup>4</sup> <https://www.nokut.no/om-nokut/nokut-podden/>

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		Quality summaries are a valuable contribution to discussions around operationalisations of standards, indicators and evidence as well as development of rules and regulations based on analysis and research.

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Podcasts



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