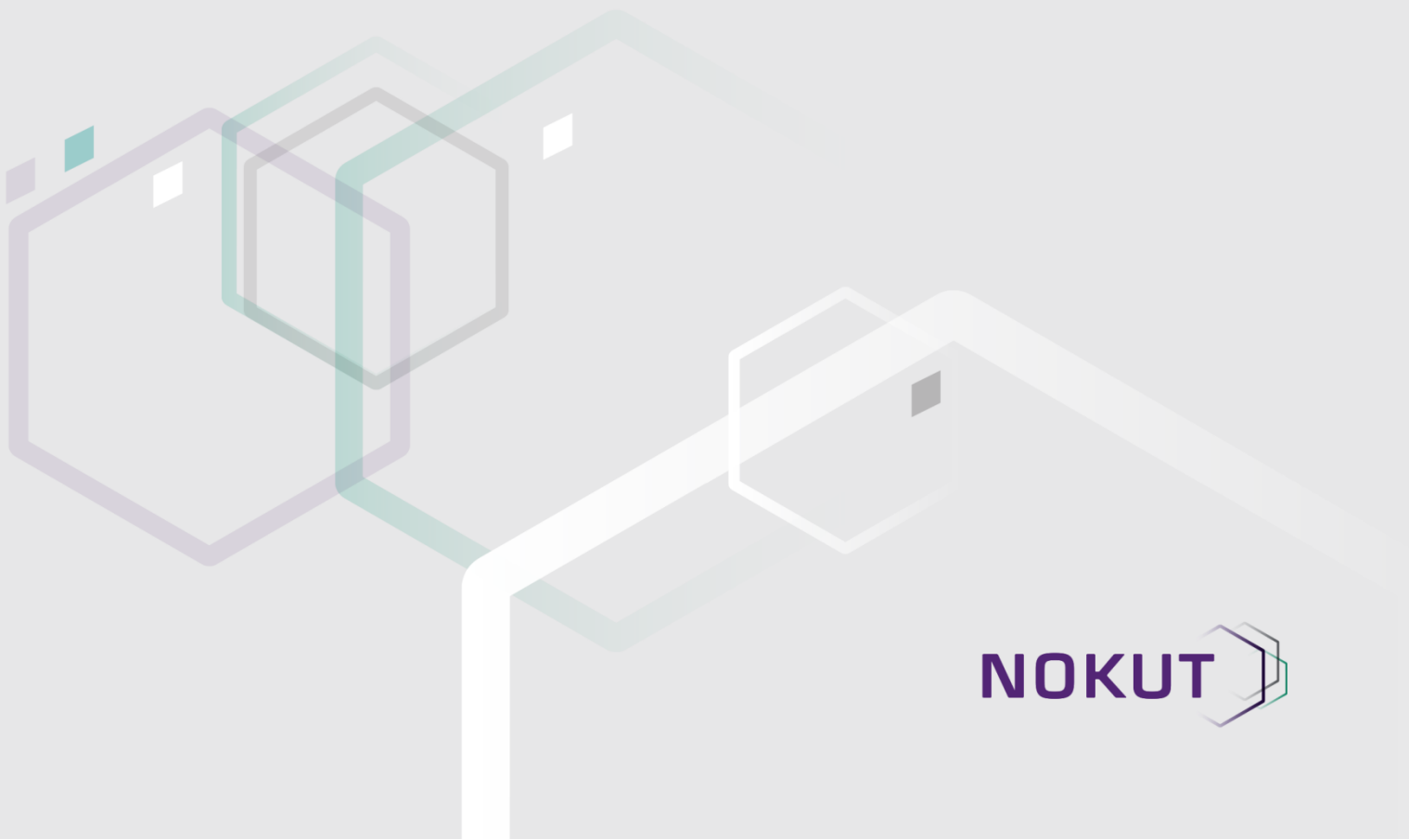


ENQA Review of NOKUT

Self-assessment Report

December 2017



NOKUT 

Preface

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.

This self-assessment report is produced as part of NOKUT's application for renewal of its membership in the European Association for Quality Assurance in Higher Education (ENQA), as well as its continued registration in the European Quality Assurance Register for Higher Education (EQAR).

The structure of the self-assessment report is based on Annex II in the Guidelines for ENQA Agency Review (2016). The report draws on texts from procedural descriptions, the NOKUT website, NOKUT's strategy documents, national laws and regulations and other core documents, included as attachments to this report.

Senior advisor Gertie De Fraeye and advisor Erin Nordal collected all relevant documents and wrote the majority of the report with the support of section head Stephan Hamberg and senior advisor Åsne Kalland Aarstad. The team consulted with NOKUT's management throughout the process and with relevant NOKUT staff when necessary. NOKUT's Board discussed strategic decisions and content. The Board's involvement throughout the writing process has been vital in ensuring stakeholder involvement, and their feedback was taken in to the report prior to its submission to ENQA.

Terje Mørland

NOKUT Director General

Readers' guide

This self-assessment report is divided into five parts:

- 1) Part one provides an overview of the context that defines the scope conditions for higher education quality assurance in Norway. This includes an introduction to the Norwegian higher education landscape, the legal framework regulating higher education and NOKUT's role within this context.
- 2) Part two (chapter 2 to 6) describes NOKUT's organisation, internal processes and international activities.
- 3) Part three (chapter 7 and 8) gives a detailed overview of the Norwegian model for quality assurance, NOKUT's quality assurance activities and supporting activities.
- 4) Part four (chapter 9 and 10) evaluates NOKUT's compliance with the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), Part 3 and 2.
- 5) Part five (chapter 11 to 13) examines NOKUT's development since the last ENQA review in 2013, provides a SWOT analysis and explores current challenges and areas for future development.

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PART I: CONTEXT – THE NORWEGIAN HIGHER EDUCATION SYSTEM

1 Higher education in Norway

This chapter introduces the Norwegian higher education system and presents the legal framework for quality assurance. The aim of the chapter is to draw attention towards the scope conditions for NOKUT's activities. The chapter also highlights interlinked structural and regulatory changes that have necessitated adjustments by stakeholders across the higher education sector, hereunder NOKUT.

1.1 Overview

At present, Norway has 55 higher education institutions (HEIs). There are eight universities, all public, eight specialised university institutions, three of which are private, and the rest are university colleges, both public and private. In total, there are 26 private institutions. A large majority of private institutions are small and often specialised within a specific academic field.

The Norwegian higher education system is characterised by its public nature and funding system for all higher education institutions, public and private. All public and most private higher education institutions receive public funding. A large majority of students attend public institutions without tuition fees.

Norway implemented the Bologna process in 2003 through the so-called Quality Reform. A major goal for this reform was for institutions to provide more feedback and academic counselling to their students as a means to increase student success through higher completion rates, faster graduation and improved learning outcomes. At the governance level, the performance indicators used to assess development have primarily focused on effectiveness, e.g. ECTS production and completion rates.

The government implemented a structural reform in 2013, which has led to a series of mergers and takeovers within the higher education sector. The 79 higher education institutions NOKUT reported at the end of 2012 have become 55, with the number decreasing each year due to further restructuring. Fourteen university colleges and universities merged into five universities in 2016, and more mergers are expected in the years to come.

Institution type	2013 (1 January)			2017 (1 January)		
	Public	Private	Total	Public	Private	Total
University	8	0	8	8	0	8
Specialised university institution	6	3	9	5	3	8
University college (with institutional accreditation)	28	8	36	15	7	22
University college (with study programme accreditation)	1	20	21	1	16	17
Total	43	31	74	29	26	55

Table 1. Types of higher education institutions in Norway

These structural changes have led to an increase in students enrolled in universities and a subsequent decrease in students enrolled in university colleges. However, the mergers have not led to any significant shift in the share of students enrolled in public institutions vs. private institutions. About 15 percent of students are enrolled in private institutions, and about 50 percent of these students are enrolled in private specialised university institutions. For the public HEIs, the changes have been more significant. In 2013, 42 percent of students enrolled in public universities, whereas in 2017 this number was 52 percent. At the same time, enrolment at public specialised university institutions and university colleges dropped from 43 to 33 percent.

The national budget for 2017 allocates NOK 36.5 billion (3.9 billion euro) to HEIs. In October of this year, the government announced a proposed national budget for 2018 that allocates NOK 37.9 billion (4 billion euro) for HEIs, an increase of 3.8% nominally.

Norway has a combined basic and result- and incentive-based funding model for higher education institutions. The model is divided into three components:

- The largest share of the total allocation is the basic component, which is intended to support stability and selected priorities.
- The education component is subject to educational results such as ECTS production and international student exchange.
- The research component is subject to research results, measured by indicators for scientific publishing, Ph.D. candidate production and acquisition of research funds.

1.2 Legal framework

The Universities and University Colleges Act

The Act of 1 April 2005 relating to Universities and University Colleges regulates all Norwegian HEIs. It guarantees their institutional autonomy and regulates how institutions are governed. The Act also covers students' rights, obligations and representation, student admission, teaching, examinations, appeals procedures and the appointment of staff.

The Universities and University Colleges Act established the Norwegian Agency for Quality Assurance in Education (NOKUT) in 2002, becoming operative on 1 January 2003. NOKUT is not a part of the government structure and acts independently inside a given framework of law and the Ministerial Regulations described below.

The Universities and University Colleges Act regulates the quality assurance of higher education. The precondition of accreditation to provide higher education is prescribed in Section 3-1: *Accreditation is understood in the present Act to mean an academic assessment of whether a higher education institution or a study programme meets the standards and criteria set by the Ministry and NOKUT. Accreditation is a condition for the provision of higher education.* The Act also guarantees the right of accredited institutions to establish programmes and award national degrees. Simultaneously, the Act mandates NOKUT to revoke an institution's or a study programme's accreditation if requirements are not met after the institution is given time to correct shortcomings.

Regulation concerning quality assurance and quality development in higher education and tertiary vocational education/ Ministerial Regulations

The Ministry of Education and Research issues Ministerial Regulations pursuant to the provisions in the Universities and University Colleges Act. They contain criteria for institutional accreditation as a university, a specialised university institution or a university college. The Ministerial Regulations also contain additional criteria for the accreditation of master and doctoral programmes, and requirements for documentation when institutions use their self-accreditation authority to establish new study programmes. The Ministerial Regulations require institutions to evaluate their study programmes periodically with the contributions of peer experts in order to assure the quality of their programmes and stimulate enhancement.

NOKUT's Regulations concerning supervision of the educational quality in higher education / Academic Supervisions Regulations

In the Academic Supervisions Regulations, NOKUT sets out requirements for its quality assurance activities. NOKUT revised the Academic Supervisions Regulations in February 2017.

At the programme level, the Academic Supervisions Regulations set requirements for study programmes and their academic environments. The revised regulations increased focus on the active role a student has in his/her learning process. It also introduced a new requirement on educational leadership for each programme, and increased the focus on programme design and learning environments. In addition, the new Regulations requires programmes to increase their interaction with society and the workplace.

At the institution level, NOKUT introduced a new set of criteria for its institutional quality assurance audit pursuant to changes in the Ministerial Regulations, described in chapter 8.2 and under ESG 2.5.

In addition, the Academic Supervisions Regulations contain procedural requirements for accreditation and supervision conducted by NOKUT, as well as for the appointment of experts and their expertise.

1.3 Quality assurance in Norway

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.

There are two main entrances to quality assurance in Norwegian higher education. The first relates to accreditation of educational provisions and the other relates to audits, supervisions and revision of accreditation.

Accreditation

Accreditation is mandatory and universal for all formally recognised higher education in Norway. Accreditation is not limited to a specified period but is considered valid until explicitly revoked following a revision. The accreditation formula combines institutional and programme accreditation.

Institutional accreditation gives universities and colleges certain rights to award national degrees or diplomas. There are three categories of institutions, each with certain self-accreditation authority. These authorities vary with institutional category, of which there are four:

- University: authority to self-accredit at all levels, including doctoral programmes
- Specialised university institution: authority to self-accredit at all levels within their doctoral fields
- University college: authority to self-accredit at the bachelor degree level, but university colleges that have NOKUT accredited Ph.D. programmes can also accredit master programmes within their doctoral fields
- University colleges without institutional accreditation: for these university colleges, NOKUT must accredit all educational provisions

Self-accreditation rights	University	Specialised university institution	University college	University college without accreditation
First cycle programmes (Bachelor)	Green	Green	Green	Red
Second cycle programmes (Master)	Green	Orange	Orange	Red
Third cycle programmes (Ph.D.)	Green	Orange	Orange	Red

Table 2. Illustration of self-accreditation authority. Green indicates full self-accreditation authority, orange indicates full self-accreditation authority with in doctoral fields, and red indicates no self-accreditation authority.

The system allows institutions to seek institutional accreditation in a different (‘higher’) category, following a process of institutional accreditation. Thus, a university college may apply to NOKUT for accreditation as a specialised university institution or a university. We describe the criteria, process and methods for institutional accreditation in chapter 8.

In addition to institutional accreditation, NOKUT is responsible for accrediting all programmes that institutions cannot accredit themselves. Thus, new provisions in accredited institutions that go beyond the self-accreditation authority that follows from the institutional category must be accredited by NOKUT. See chapter 8 for details of the criteria, process and methods for programme accreditation.

Control and revocation of accreditation

Because NOKUT’s accreditations are not bound by time, it is important to have reliable control mechanisms to ensure that institutions and study programmes comply with the legal framework. To ensure this, NOKUT uses a combination of institutional quality assurance audits, supervision and revision of accreditation¹ of programmes and institutions (see chapter 8 for details).

Institutional quality assurance audits represent the systematic, comprehensive mechanism for external scrutiny of the quality of higher education. All institutions must go through an audit of their internal quality assurance system and the institution’s systematic quality work. Institutions with self-accreditation rights that fail to conduct internal quality assurance in accordance with the criteria lose their rights to self-accredit new educational provisions, until the institution passes another audit takes. Institutions that must apply NOKUT to accredit new educational provisions lose the right to apply to

¹ In the remainder of the report we use ‘revision’ to refer to ‘revision of accreditation’

NOKUT for new accreditations, until the institution passes another audit. The audits cannot themselves lead to the loss of institutional accreditation.

Revisions of programmes and institutions can be triggered by indications from NOKUT's audits and supervisory activities, but also by other indications, and they may be carried out as random tests. Revisions of accreditation, both programme accreditation and institutional accreditation, can lead to the loss of accreditation and consequently to the loss of public funding.

The legal framework surrounding Norwegian higher education is fundamentally characterised by autonomous stakeholders. Since institution and programme accreditations are not limited to a specified period, NOKUT uses its extensive capacities to supervise study programmes and institutions to ensure that all educational provisions maintain a high quality. Maintaining the right balance between trust and verification is a key concern in the Norwegian model and all of NOKUT's operations are designed with this balance in mind.

ATTACHMENTS AND FURTHER INFORMATION

- Universities and University Colleges Act: attachment 1
- Ministerial Regulations: attachment 2
- NOKUT's Academic Supervision Regulations: attachment 3

PART II: NOKUT

In this part, we describe NOKUT's history and mandate, as well as the organisation and the portfolios of its various departments and sections in chapter 2. Chapter 3 provides an overview of NOKUT's strategies and chapter 4 describes NOKUT's internal quality assurance. Chapter 5 identifies our stakeholders, how they are involved and how they perceive NOKUT. In chapter 6, we discuss our international engagements.

2 Organisation

2.1 *History and mandate*

NOKUT was established with the revision of the Universities and University Colleges Act in 2002 as an independent agency. The agency became operative on 1 January 2003. In section 2-1, the Act lists NOKUT's main tasks and empowers the agency as the only official quality assurance agency for Norwegian higher education.

NOKUT's main tasks regarding external quality assurance are to:

- Make all accreditation decisions concerning higher education that go beyond the institutions' self-accrediting powers.
- Audit all institutions' internal quality assurance system and their systematic work with quality.
- Carry out supervision with the purpose of revising specific accreditations. Any institution can have their institutional or programme accreditations revoked or suspended following a negative assessment in this type of supervision.
- Carry out other types of evaluations with the general purpose of investigating, assessing and developing the quality of higher education in Norway. The Ministry may instruct NOKUT to undertake such evaluations.

NOKUT's plans and initiations of supervision activities, as well as assessments and decisions relating to educational quality, are made independently and cannot be modified or reversed by political authorities or third parties.

2.2 Organisation

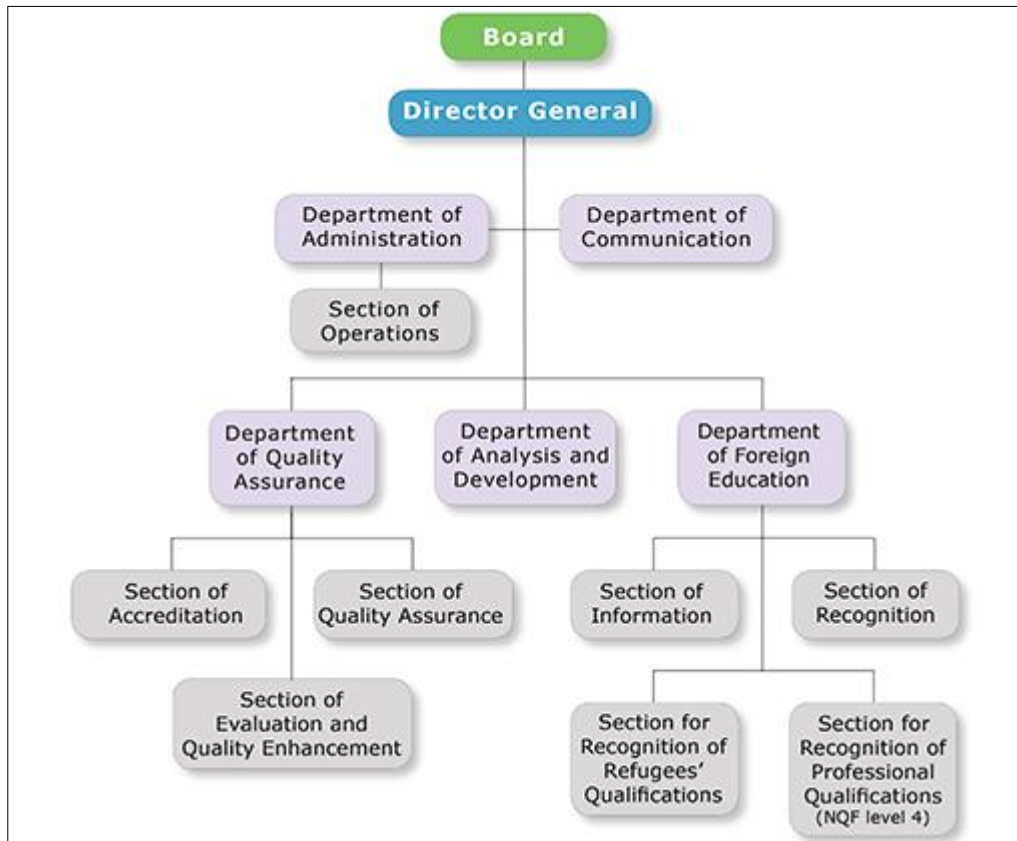


Figure 1. NOKUT organisational chart

Board

The Board of NOKUT is regulated by the Universities and University Colleges Act section 2-2. It is the agency's supreme governing body and formally possesses all of NOKUT's decision-making powers. Besides the decisions delegated to NOKUT's Director General, the Board retains decision-making powers over decisions on institutional quality assurance audits, institutional accreditations, programme accreditations at the Ph.D. level and the concluding decisions for all institutional or programme revisions of accreditation. This applies in addition for all cases where an expert panel has not been able to reach a conclusion, which happens very rarely. The Board also decides on decisions concerning finance, strategy, reports and action plans and quality assurance criteria.

The Board consists of eight full members, including the Chair, each appointed by the Ministry of Education and Research.² Appointment is for four-year terms, with the possibility of prolongation for another term. The Board's student members are appointed for two years. The Board has a ninth member, appointed by NOKUT's staff, whose vote is restricted to matters relating to NOKUT's

² The current Board members have the following background:

- The current chairperson and two other members are professors at higher education institutions, currently all Norwegian
- Three of the current members represent business organisations, two of them Norwegian and one from the Danish Society for Education and Business
- One student representative from the National Union of Students in Norway (for higher education students)
- One student representative from the National Union of Students in Higher Vocational Education and Training in Norway
- One representative from NOKUT's staff – who only has voting rights on matters relating to NOKUT's organisation and staff

organisation and staff. Members of the Board may not hold leading positions or elected office at Norwegian higher education institutions. The Board meets approximately six to eight times a year.

Director General

The head of NOKUT's Office is the Director General. She/he is appointed by NOKUT's Board for a six-year term, with the possibility of prolongation for one more term. The Director General's function is prescribed in instructions from the Board, which delegates powers. Some of the powers delegated to the Director General are delegated further on to the Director of Quality Assurance.

Management Group

NOKUT's management consists of the Director General and the five Directors of each of NOKUT's departments. The Management Group is the Director General's main tool for steering and coordinating the activities of the Office. The Management Group meets once a week.

Department of Quality Assurance

NOKUT's Department of Quality Assurance is responsible for NOKUT's external quality assurance activities.³ The following activities derive from the Department's authorities: institutional quality assurance audit, institutional and programme accreditation, monitoring activities, supervision and revision of accreditations. In addition, the Department also carries out projects with the purpose of enhancing Norwegian higher education and disseminating best practices.

The Department of Quality Assurance comprises three sections:

- The Section of Accreditation, tasked with accreditation of institutions and study programmes, both within Norwegian higher education and tertiary vocational education.
- The Section of Quality Assurance, tasked with institutional quality assurance audits, revision of accreditations of institutions and study programmes and other supervision tasks such as thematic supervision projects, both within Norwegian higher education and tertiary vocational education.
- The Section of Evaluation and Quality Enhancement, which carries out evaluations and developmental projects and activities, with the aim of quality enhancement. This section was established in 2016 due to a growing number of enhancement activities in this field.

Department of Analysis and Development

The main task of the Department of Analysis and Development is to maintain and develop NOKUT's knowledge base (see chapter 7). Through its mapping, studies and thematic analyses, the Department contributes to the further development of NOKUT's policy instruments. The Department is also NOKUT's statistics and quantitative data resource, and maintains two large-scale surveys on students' and lecturers' perception of study quality at their affiliated institutions. In addition, the Department is responsible for the Centres for Excellence in Higher Education (SFU) and the prize for quality in higher education (see chapter 7.3 for more information).

³ NOKUT is responsible for the accreditation, revision and supervision activities related to tertiary vocational education on EQF level 5.³ Since the quality assurance of tertiary vocational education does not fall under the scope of the ESG, it will not be discussed further.

The Department's outputs feed directly into the work conducted in other departments, especially the Department of Quality Assurance, and ensures that NOKUT's external quality assurance activities are based on up-to-date empirical knowledge (see chapter 7, for details).

Department of Foreign Education

NOKUT's Department of Foreign Education is Norway's ENIC/NARIC office and processes applications for recognition of foreign education. The Department receives more than 10,000 applications for recognition of foreign education each year. The Department is also the National Contact Point for the EQF. However, due to the scope of ENQA's review, the operations of the Department of Foreign Education are not extensively described in this self-evaluation.

Department of Communication

NOKUT makes active efforts to increase Norwegian society's knowledge about higher education and tertiary vocational education. The Department of Communication is in charge of and coordinates NOKUT's contact with the media and the public.

Department of Administration

The Department of Administration works with human resources, NOKUT's budget and finances, NOKUT's (public) archive, IT and other supporting activities. NOKUT's quality assurance activities have benefited greatly from IT development over the past years, through the creation of a new online archive and the current development of an improved online application systems. IT development has also resulted in a professionalisation of NOKUT's routines through the development of a quality handbook, as described in chapter 4.2.

ATTACHMENTS AND FURTHER INFORMATION

- Annual reports, informative version in Norwegian only:
<https://www.nokut.no/publikasjoner/arsrapporter-og-arsmeldinger/>
- Annual reports, short version in English: <https://www.nokut.no/en/publications/annual-reports/>

3 NOKUT's strategies

NOKUT and its powers are regulated by the Universities and University Colleges Act and Ministerial Regulations (see chapter 1.2). Within this context, NOKUT determines its own strategy. The vision and overriding goal for the organisation is set through the strategic plan and the associated subsidiary strategic policy documents.

In 2014, NOKUT defined its overall mission, its goals and its strategies for quality assurance activities in the new strategic plan for 2015-2020, titled the Development Strategy. Annual plans containing steering parameters, risk analysis and budgetary priorities ensure that the strategic plan is put into practice (see chapter 4.1).

In addition to the strategic plan, NOKUT has developed several strategic policy documents that support NOKUT's mission and day-to-day operations.

3.1 Development Strategy 2015-2020

NOKUT developed its latest strategic plan in consultation with higher education institutions, students, working life and other stakeholders, and the Board adopted the plan. In its strategy, NOKUT emphasises dialogue and cooperation with stakeholders, NOKUT's independence and its responsibilities to Norwegian society as a whole.

Through this strategy, NOKUT aims to be:

- a clear and visible ambassador for quality in education
- a key agenda-setter with sound expertise in Norwegian and foreign higher education and Norwegian tertiary vocational education
- a competent, reliable and efficient administrative agency

The Development Strategy defines NOKUT's mission and its goals and strategies for achieving these. NOKUT's social mission is:

NOKUT (the Norwegian Agency for Quality Assurance in Education) is an independent expert body and administrative agency with expertise in the field of Norwegian and foreign higher education and tertiary vocational education.

NOKUT:

- *supervises, provides information about and contributes to developing the quality of Norwegian study programmes and institutions*
- *recognises and provides information about foreign educations and about the procedures for having foreign qualifications recognised in Norway.*

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

Goals

The Development Strategy lists three goals as a way of fulfilling its mission. Under each goal, NOKUT also lists a description of actions and measures for achieving each goal (see Development Strategy 2015 – 2020 for details).

- *Goal 1: NOKUT shall contribute to all study programmes at Norwegian universities, university colleges and institutions at tertiary vocational level being of satisfactory quality, that as many programmes as possible are outstanding, and that society is well informed about the status in the sector.*
- *[Goal 2 relates to recognition of foreign education.]*
- *Goal 3: NOKUT shall manage its activities, expertise and resources in an efficient manner in accordance with its social mission and international standards in the field.*

Sub-Strategies

NOKUT's Development Strategy aims to strengthen and develop its activities in line with five sub-strategies:

- *Sub-strategy 1: NOKUT shall intensify its efforts to acquire and disseminate knowledge about the situation in higher education*

- *Sub-strategy 2: NOKUT shall be more active in stimulating the development and improvement of higher education*
- *Sub-strategy 3: NOKUT shall develop more effective and targeted supervision of higher education*
- *[Sub-strategy 4 is purely related to recognition of foreign education]*
- *Sub-strategy 5: NOKUT shall further develop its efficient, competent and user-oriented organisation*

See the attached Development Strategy 2015-2020 for details.

3.2 Policy for HR development

To achieve the goals set forth in the strategic plan, NOKUT has created a Development Plan for Culture and Competence. In this plan, NOKUT defines three core values to guide the organisation's activities and the behaviour of individual employees:

- Accountable
- Service-minded
- Innovative

The Development Plan for Culture and Competence specifies these values at the level of section/departments in order to fit the various tasks distributed across the organisation. The values are also used in other HR processes, such as NOKUT's annual staff review and recruitment processes. Finally, it is the responsibility of each employee to adhere to these values in all operations carried out on behalf of NOKUT. See Development Plan for Culture and Competence for details.

3.3 Policy document: Quality Areas for Study Programmes, 2016

In 2015-2016, NOKUT developed the policy document "Quality Areas for Study Programmes".

The policy document describes NOKUT's understanding of quality in higher education. The document is intended to communicate with higher education institutions and society about educational quality and challenges to educational quality. It breaks down the concept of educational quality by describing a set of quality areas for study programmes. These quality areas underpin in NOKUT's evaluations and descriptions of quality in the educational sector, and appear in NOKUT's monitoring activities, analyses, evaluations and indicator development. It was also an important guiding document in the development of NOKUT's new Academic Supervision Regulations (see chapter 1.2) and specific criteria for the Combined Education and Research Evaluations.

By focusing on the student and her/his path through higher education, NOKUT looks at quality from admission to achieved learning outcomes. In order to understand what makes this path meaningful and stimulating for students, the document highlights the following quality areas that may facilitate learning:

- knowledge base
- learning trajectory
- initial competence
- learning outcomes
- educational competence

- interaction with society and the workplace
- learning environment
- programme design and programme leadership

NOKUT believes that a good study programme is developed and implemented in such a way that students have sufficient opportunities to achieve high learning outcomes, and that the education corresponds to society's needs for competence. Study programmes should encourage students to take an active role in the learning process, which should be reflected in the assessment of students. Internationalisation is also a part of each quality area; providing quality education requires institutions to be aware of how internationalisation can strengthen their work.

ATTACHMENTS AND FURTHER INFORMATION

- Development Strategy for 2015-2020: attachment 4
- NOKUT's policy document Quality Areas for Study Programmes: attachment 5
- Development Plan for Culture and Competence: attachment 6

4 Internal quality assurance

This chapter describes, firstly, how NOKUT carries out internal quality assurance through its Internal Quality Steering System and corresponding internal quality assurance practices at the Department of Quality Assurance. Next, the chapter describes which measures ensure that standard procedures and routines are followed, and how NOKUT keeps a high level of professionalism amongst its staff and external experts.

4.1 Internal Quality Steering System – NOKUT

NOKUT has an Internal Quality Steering System that ensures quality in deliveries and a good and efficient management, and contributes to better processes for learning and enhancement.

The Internal Quality Steering System consists of six key features:

1. NOKUT's key strategic document (chapter 3.1), the Ministry's annual budget allocation letter and NOKUT's annual reports. They define NOKUT's overarching goals and priorities, NOKUT's scope of action, report on achievements, and set priorities for the next budget cycle.
2. Steering documents for all of NOKUT's processes. These documents ensure that NOKUT's activities are carried out in a consistent manner across project groups and budget cycles.
3. NOKUT's competence ensured through recruitment and continued competence enhancement of staff.
4. Risk management, ensured simultaneously at the management level through biannual risk assessment and in all projects through mandatory risk assessments in project plans anchored in the quality handbook (chapter 4.2).
5. Internal control, continuous and periodic. The former refers to the everyday checks and balances of regular project work with point of departure in established routines and practices anchored in the quality handbook (chapter 4.2). The latter refers to topical periodic reviews initiated by the Director General, aiming to evaluate dimensions such as achievement of objectives, quality of deliverables, etc.

6. Quality enhancement, continuous and systematic. The former refers to the everyday improvement mechanisms anchored in established routines and practices anchored in the quality handbook (chapter 4.2). The latter refers to the improvement mechanisms anchored in NOKUT's annual cycle.

The system as a whole ensures internal quality assurance and compliance with the requirements for public administration in Norway and the accountability rules of its finances. Based on the system's results, made available in annual reports, NOKUT identifies measures for improvement and specifies their follow-up. The Internal Quality Steering System forms the foundation for the development of NOKUT's annual report and annual plan.

NOKUT's internal staff survey is an integrated part of the Internal Quality Steering System, and ensures annual internal feedback to NOKUT's Board and Management Group. An external party conducts the employee survey biennially. In addition, several other mechanisms ensure external feedback:

- Stakeholder survey, conducted periodically by an external party (see chapter 5)
- Public consultations in all matters regarding the revision of NOKUT's regulations
- Feedback questionnaires and other evaluation mechanisms following NOKUT events and projects involving external parties.
- Reference groups consisting of stakeholders giving feedback when developing a new activity

NOKUT's annual cycle ensures that the quality assurance mechanisms of the Internal Steering System are carried out in a systematic and cyclical manner:

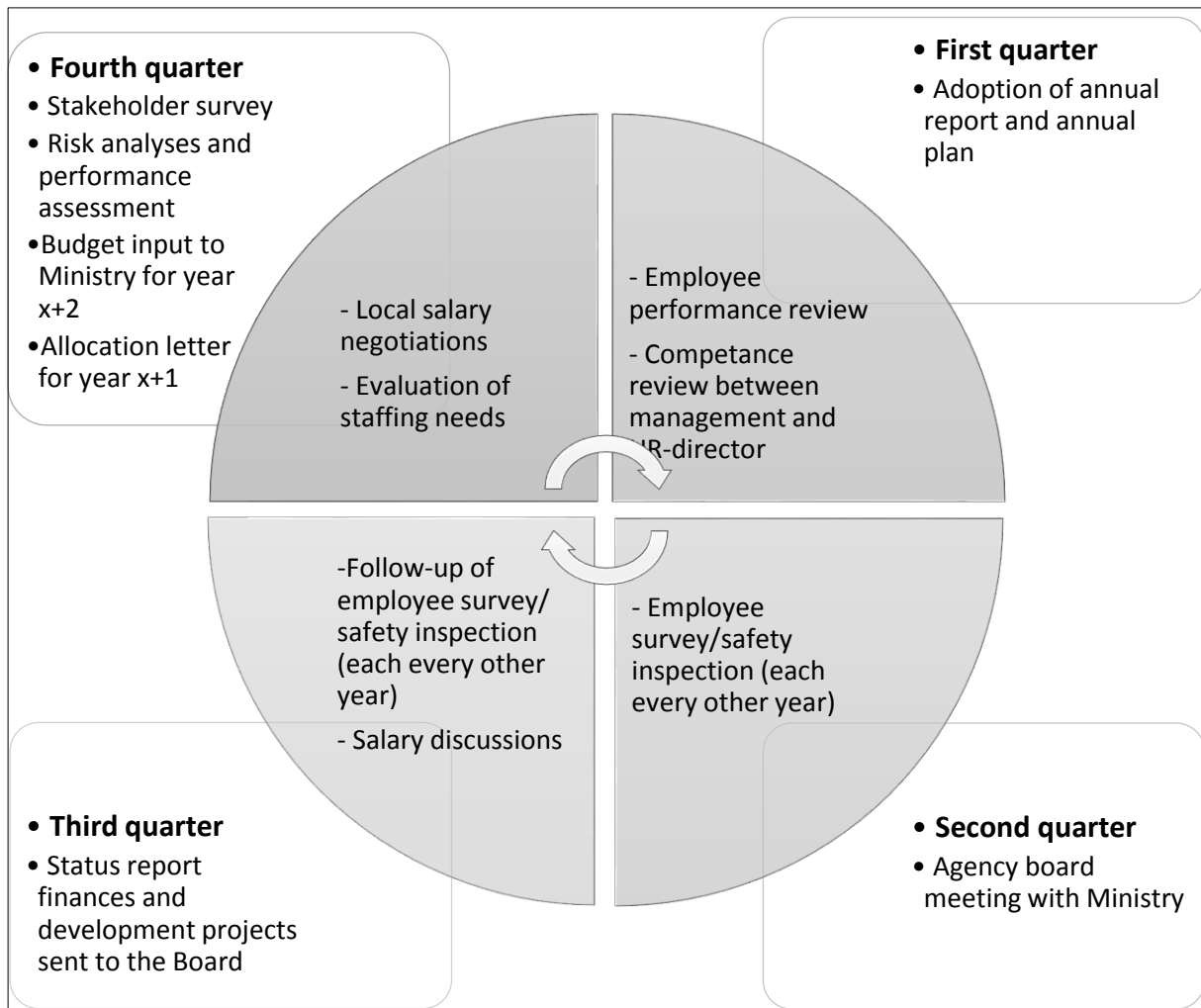


Figure 2. NOKUT's annual cycle

4.2 Quality handbook

NOKUT's quality handbook operationalises the quality assurance mechanisms identified in chapter 8 at the level of quality assurance activities. It is NOKUT's aim that the quality handbook covers all of NOKUT's projects and processes, but currently only accreditation, institutional quality assurance audit, and supervision activities under the Department of Quality Assurance are covered. The quality handbook ensures the quality of these activities by ensuring that the entire Department of Quality Assurance uses established routines, checklists and standard protocols in their work. The routines, checklists, and protocols are described under each process in the handbook. This includes routines for evaluating the projects, the use of experts, appeals processes, handling indications of quality deficiencies, quality assurance of NOKUT's projects and processes and updating the quality handbook. The handbook, in its present form, is a recent innovation.

An important systematic novelty introduced by the handbook is the requirement that all quality assurance activities and projects undergo an evaluation in the format of a final report, which formulates results, challenges and lessons learned. External and internal feedback must be included in this report. Finalised reports are first discussed among staff members in the relevant sections, and department management is responsible for raising the results of the final reports in relevant forums

and adjusting routines where necessary. Management is also responsible for ensuring that the reports are included in the documentation feeding back into the internal quality steering system, including risk management, assessment of steering parameters, planning future activities, staff and budget.

4.3 Professional conduct of staff and experts

As part of NOKUT's internal quality assurance, NOKUT has a number of internal policies and regulations in order to secure professional conduct:

Non-conflict of interest of employees and experts

In addition to the University and University Colleges Act, NOKUT is also subject to the Public Administration Act regulating conflict of interest, which aims to regulate distinctive and individual circumstances, which may impair the trust in an individual's objectivity in a specific case. This law applies to all of NOKUT's employees, peer experts and the Board. Experts fill out a detailed non-conflict of interest form. The criteria are based on national law, but made more specific in certain instances. The same criteria for conflict of interest also apply for NOKUT's employees.

Ethical guidelines

All public bodies are subject to the ethical guidelines for public service. NOKUT has a supplementary set of guidelines that build upon the general ethical guidelines, yet are adapted to NOKUT's mandate and tasks. NOKUT's ethical guidelines cover issues such as transparency, reporting requirements, efficiency requirements, receiving gifts, professional independence/objectivity, freedom of expression, reporting critical activities and preserving NOKUT's reputation.

Expert training

NOKUT holds training sessions and meetings with all experts that undertake peer-review tasks for NOKUT, in which NOKUT's administration guides experts on the procedure and requirements for the given activity. During the training sessions, experts are informed of NOKUT's expectations for professional and ethical conduct. Should an issue arise in which an expert behaves unprofessionally, NOKUT contacts the expert directly to discuss the issue and inform the expert of NOKUT's regulations. If the issue is very serious, NOKUT may terminate the contract with the expert and find a replacement.

Internal communication and intranet

NOKUT also has a number of channels for internal communication. An essential channel for reaching out to all employees is through NOKUT's intranet. Employees can find all of NOKUT's official documents, regulations and routines on the intranet, and management and all employees can post messages, information about upcoming events, NOKUT external publications and knowledge. NOKUT also holds monthly meetings with employees to inform them about internal issues in the organisation, new findings and activities and trends in the higher education and tertiary vocational sector. The sections of the Department of Quality Assurance hold weekly meetings.

Targeted communication and plain language

NOKUT has an expressed goal for ensuring plain language, ensuring that all of our texts, such as reports and correspondence, are expressed so that the recipient can easily understand the content. These standards and routines apply for all NOKUT employees, the Board of NOKUT and experts. Tips and advice are available on NOKUT's intranet, and each year NOKUT provides a plain language course for all employees.

ATTACHMENTS AND FURTHER INFORMATION

- Internal Quality Steering System: attachment 7
- Quality Handbook:
<https://cp.compendia.no/nokut/kvalitetssystem/?key=bf181ab8376859035164f94075e2a3a6>

5 Information and opinions of stakeholders

Stakeholders

In terms of quality assurance, these are NOKUT's main stakeholders:

- higher education institutions
- the Ministry of Education and Research
- the Norwegian Association of Higher Education Institutions
- the National Union of Students in Norway and other student organisations
- other government agencies, such as the Norwegian State Educational Loan Fund, the Norwegian Directorate for Education and Training and the Norwegian Universities and Colleges Admission Service
- interest organisations that work with issues related to higher education, politicians, labour unions and business and industry organisations

The Board of NOKUT consists of a number of members with backgrounds from various stakeholder groups. These include academics, representatives from business and industry and students. This composition strengthens the relationships between NOKUT, the higher education sector and society by ensuring a plurality of voices in NOKUT's core decisions. NOKUT regularly involves stakeholders in its processes. NOKUT sends information about new activities, policies and standards to public consultations.

Stakeholder Survey: evaluating NOKUT and its strategy

In 2016, NOKUT initiated a stakeholder survey conducted by an external party. In this process, a series of semi-structured interviews with 29 leading representatives from some of the organisation's most central stakeholders, including representatives from universities and university colleges, student organisations, parliamentary representatives, the Ministry of Education and Research, cooperating agencies in the field of education, interest organisations, business and industry, academia and think tanks.

The purpose was to map NOKUT's reputation along defined parameters, as well as to increase insight into what the organisation's key stakeholders think about what NOKUT does, the way it conducts its work, what expectations they have, and how they feel that NOKUT fulfils its role. NOKUT also wanted to uncover any areas of improvement and issues that stakeholders believe it should focus more on in the future.

The feedback from the respondents was overall positive, and NOKUT's role is considered important to the education sector and society in general. NOKUT is perceived as a competent agency, and the institutions highlighted NOKUT's useful assistance in the development of their quality assurance systems. A concern from the higher education sector is the potential conflicting role NOKUT plays as a controller of quality in higher education and NOKUT's role in quality enhancement. NOKUT takes

this critique seriously and continuously works on how we can better define the scope of our various activities. The survey also revealed a need to clarify and inform the sector of how NOKUT can provide clearer advice, especially related to monitoring activities with the institutions. This input has been implemented in the ongoing work with the new model for monitoring activities and communication with the sector and the general public.

ATTACHMENTS AND FURTHER INFORMATION

- Public consultation process for NOKUT's Academic Supervision Regulations (in Norwegian only): <https://www.nokut.no/nyheter-2016/Forslag-til-ny-studiestilsynsforskrift-pa-horing-Studentenes-laring-i-sentrum/>
- Conference regarding the public consultation process for NOKUT's Academic Supervisions Regulations (in Norwegian only): <https://www.nokut.no/nyheter-2016/NOKUT-inviterer-til-horingskonferanse-30-september/>

6 International activities

NOKUT is an internationally oriented organisation, as demonstrated by its participation in international projects and its large network of international partners. This orientation enables NOKUT to absorb knowledge and impulses from abroad, and to contribute to ongoing debates on theory, methodology and practice within the quality assurance field. At the same time, NOKUT disseminates information about the Norwegian higher education system of quality assurance and enhancement through lectures and presentations in international cooperation projects and networks.

NOKUT's international collaboration focuses on key Nordic and European networks and organisations. NOKUT also takes part in some multilateral and bilateral partnerships with other national quality assurance bodies.

On the Nordic level, NOKUT is a member of the Nordic Quality Assurance Network in Higher Education (NOQA), while on the European level, NOKUT is a member of ENQA and the European Association for Institutional Research (EAIR), as well as a registered agency in EQAR. NOKUT is also involved on the international level in the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). In addition, NOKUT participates at international events such as the European Quality Assurance Forum and the EAIR Forum, and staff have regularly presented papers at these conferences.

Active participation in ENQA has been an important part of NOKUT's European-wide engagement. NOKUT has been represented on ENQA's Board since 2012, as well as the Internal Quality Assurance Working Group (ENQA-IQA). NOKUT also participates in a number of other ENQA events and in 2017, NOKUT hosted ENQA Members' Forum. This close involvement in the network provides valuable knowledge and information that NOKUT uses in its activities, for instance in the application of the ESG and the development of quality assurance methods and practices.

In addition, NOKUT works with a number of other quality assurance agencies. NOKUT staff serve as board members and advisors for other European quality assurance agencies. Several staff members have acted as experts in higher education evaluations or served on expert committees abroad. NOKUT

is also often host to visiting quality assurance agencies from other countries, and the department's staff members travel to other quality assurance agencies to learn and share experiences.

NOKUT is also involved in international projects, such as the previously mentioned Euroma pilot project, which uses an international peer expert panel to analyse subject-specific factors for quality enhancement. The Department of Foreign Education is also involved in a number of Erasmus+ funded projects.

ATTACHMENTS AND FURTHER INFORMATION

- NOKUT's international cooperation: <https://www.nokut.no/en/about-nokut/international-cooperation/>

PART III: NOKUT's QUALITY ASSURANCE OF NORWEGIAN HIGHER EDUCATION

In part three, we describe NOKUT's knowledge based approach to quality assurance of Norwegian higher education. NOKUT use a broad array of activities and measures to secure, enhance, and inform about the quality of Norwegian higher education. In chapter 7, we present auxiliary activities outside the scope of the ESG and in chapter 8 we detail all of NOKUT's external quality assurance activities that are within the ESG.

7 Supporting activities for quality assurance

In this chapter, we briefly present NOKUT's portfolio of supporting activities and measures for NOKUT's quality assurance. The activities discussed in detail in this chapter are not explicitly part of NOKUT's external quality assurance activities and are therefore outside the scope of the ESG. However, they strengthen the knowledge base of our quality assurance.

NOKUT's Activities		
Activity	What	Who
Conferences/ seminars	Breakfast meetings, conferences, seminars, workshops	Department of Communication, Department of Quality Assurance, Department of Analysis and Development
Financial incentives	Centres for Excellence in Education Initiative (SFU), Educational Quality Prize	Department of Analysis and Development
Supervision/ accreditation	Institutional quality assurance audit, accreditation/supervision/revision of programmes and institutions	Department of Quality Assurance
Knowledge base	Surveys, data portals, analysis, evaluations	Department of Quality Assurance, Department of Analysis and Development

Table 3. NOKUT's activity portfolio

This overview comprises the activities of both the Department of Quality Assurance, the Department of Analysis and Development and the Communication Department. The interplay between these activities is crucial for NOKUT to be able to reach its goals as set out in the Development Strategy 2015-2020 and annual plans.

Knowledge base

Knowledge is central to all of NOKUT's quality assurance and enhancement activities. The Department of Analysis and Development runs several large surveys, maintains data portals and conducts analyses to assess various quality dimensions in Norwegian higher education.

NOKUT runs two large surveys. The national student survey (Study Barometer) asks students about their perception of the quality of study programmes. Students in their 2nd year of study in both bachelor's and master's degree programmes and 5th year students in integrated master studies can participate in the survey; this amounts to about 60,000 students at 58 higher education institutions (the response rate is normally around 45 percent). Students are asked about various dimensions of quality in their study programme, such as quality of teaching, workload and career relevance. The data

gathered in the Study Barometer is available on a separate website (see below for link). In addition to making the data available on a unique website, NOKUT also makes all the raw data available to institutions for them to use in their own quality work.

The second survey largely mirrors the student survey, but the respondents are academic staff at the same institutions. Asking both students and academic staff about similar quality dimensions gives NOKUT an excellent overview of how the main actors in the Norwegian higher education sector view the quality of education.

In addition to the two surveys, NOKUT cooperates with the Database for Statistics in Higher Education (DBH) on the 'NOKUT Portal'. Norwegian HEIs regularly report data on their activities to DBH. In 2012, the 'NOKUT Portal' was developed on DBH's website (linked to NOKUT's website) in a joint project between DBH and NOKUT. The portal has two different missions, one for analysis and one for quality assurance activities. For the quality assurance activities, the portal currently contains 31 quality indicators. It has the particular advantage that it selects and arranges relevant data for any one of NOKUT's types of external quality assurance procedures, concerning any specific institution at both programme and institutional level. In addition to being a source of information for NOKUT, the portal is also publicly available and thus serves as a useful transparency tool for the HEIs. It also enables them to make useful comparisons with other HEIs along a whole range of indicators.

NOKUT's Section for Evaluation and Quality Enhancement carries out evaluations and development projects and activities, with the aim of quality enhancement. The Section was established in 2016 due to a growing number of enhancement activities within the Department of Quality Assurance. In general, the activities contribute to both the sector's and NOKUT's knowledge base about the quality of education. The Section is responsible for four large projects initiated and funded by the Ministry, three of which will be described here and a fourth (the pilot on Combined Education and Research Evaluations), which is considered an external quality assurance project, described in chapter 8.

- *Euroma*

Euroma is an international pilot project in cooperation with UKÄ (Sweden) and NVAO (the Netherlands and Flanders) to identify subject-specific critical factors for achieving high quality in education at master level. HEIs from Norway, Sweden, the Netherlands and Belgium participate within the fields of molecular biology and economics. Stakeholders cooperate on defining what the quality factors may be, through self-reflection, discussions and sharing experiences. A peer expert panel analyses factors for quality enhancement in a report.

- *Advisory Programme for Teachers Education (APT)*

An advisory group established by NOKUT is advising teacher education programmes (for primary and secondary education) on their transition to five-year integrated master programmes. The advisory group focuses on policy objectives for the programmes, general improvement of the programmes, introduction of best practices and stimulating continuous quality enhancement.

- *Topic-Specific National Assessment Examinations*

Since 2015, NOKUT has conducted a testing programme for national assessment examinations in selected study programmes. A preliminary summary concludes that such

exams can promote quality, but that a number of improvements are necessary if the programme is to become permanent. Our analyses of the results show that topic-specific national assessment examinations can give us important information about the students' level of knowledge, and that they make it possible for academic communities to compare themselves with others. In 2016, national assessment examinations were held in the bachelor's programme in auditing and accounting, mathematics and didactics in the teacher education programmes, and in anatomy, physiology and biochemistry in the bachelor's programme in nursing.

All of the activities discussed above are central to developing NOKUT's knowledge base, and contribute in important ways to NOKUT's overall objectives of securing and enhancing the quality of higher education in Norway.

Knowledge-based accreditation and supervision

All of NOKUT's accreditation and supervision activities are described in detail in chapter 8. However, it is important to describe briefly the link between NOKUT's knowledge base and its external quality assurance activities. NOKUT's analyses of publicly available data, described above, helps NOKUT pinpoint specific quality areas, fields of studies, types of institutions, and other issues where there are indications that the quality of education might be lower than required by national laws and regulations.

These analyses allow NOKUT's staff to identify specific programmes or programmes within a field of study with similar deficiencies, and to assess whether these are in need of supervision.

In addition to identifying which programmes are in need of supervision, NOKUT's knowledge base is also central to all supervision, revision and audit activities. Rather than relying only on self-reported information from higher education institutions and programmes, NOKUT uses the available data as an important data source in its quality assurance activities.

In sum, NOKUT's knowledge base plays a critical role in NOKUT's external quality assurance activities.

Financial incentives

NOKUT administers two incentive-based activities. The Centres for Excellence in Education Initiative ('SFU-ordningen' in Norwegian) is a prestigious national initiative for higher education that was established in 2010. SFU status is awarded to academic communities that have already demonstrated excellent quality and innovative practices in education and that have plans in place for further development and innovation. One of the important requirements the centres have to meet is that they must disseminate their results and knowledge broadly.

The second initiative is the 'Educational Quality Prize'. Each year the Ministry of Education and Research awards an education prize to a specific study programme, to reward excellent quality of education with a financial stimulus and to stimulate institutions and academic communities to continuously enhance their quality of education. NOKUT's Department of Analysis and Development processes the applications and decides on the winner.

The expertise showcased by these centres' achievements in the field of educational quality feed into NOKUT's external quality assurance activities by being examples of best practices and a source of inspiration.

Conferences and seminars

In recent years, NOKUT has strengthened its analytical expertise. We try to share this expertise through such instruments as seminars, conferences and breakfast seminars. Politicians, educational institutions, students, and other authorities and interest groups meet to discuss different aspects of quality in education and how to further raise it together. The feedback shows that NOKUT's breakfast seminars have become an important arena for people who are concerned with education, politics and social issues. Analytical reports and evaluation results are actively distributed through newsletters, blogs, Twitter, podcasts and articles in the media.

NOKUT is a knowledge-based quality assurance agency. The wide range of available activities are critical for NOKUT to achieve its mission to secure, enhance, and inform about the quality of higher education in Norway.

ATTACHMENTS AND FURTHER INFORMATION

- Study Barometer: <http://www.studiebarometeret.no/en/>
- NOKUT Portal (in Norwegian only): <http://dbh.nsd.uib.no/nokutportal/>
- Centres for Excellence in Education (SFU): <https://www.nokut.no/en/services/the-centres-for-excellence-in-education-initiative-sfu/>

8 Quality Assurance Activities

NOKUT's Academic Supervisions Regulations, the Ministerial Regulations, and certain central procedural requirements regulate the requirements for NOKUT's quality assurance activities.

NOKUT has developed detailed guidelines on its quality assurance procedures for the information of higher education institutions. These include guides for the institutional quality assurance audit and for the various types of institutional and programme accreditations.⁴ The guides for institutional and programme accreditations also apply for supervisions and revisions, as the same criteria apply. The guides provide detailed information on the requirements in the regulations. They inform accreditation applicants or institutions and programmes under revision about the criteria, precedence, details on documentation requirements, the relation to other regulations, etc. The guides also provide information on the various steps in NOKUT's procedures. Routines, on the other hand, are described in NOKUT's quality handbook, as mentioned in chapter 4.

Below, NOKUT describes in detail each of the following quality assurance activities and how they are interconnected:

- Institutional quality assurance audit
- Institutional accreditation as a university college, specialised university institution or university
- Programme accreditation on the bachelor, master and Ph.D. levels
- Supervision of programmes and institutions
- Revision of programmes and institutions
- Pilot project on Combined Education and Research Evaluations

⁴ NOKUT is currently updating its guides for institutional accreditation as a specialised university institution and as a university college, pursuant to changes in the Ministerial Regulations and NOKUT's Academic Supervisions Regulations. The guides for institutional accreditation as a university and for programme accreditation have already been updated.

8.1 An interlinked model of quality assurance activities

As described in chapter 1.3, new programmes can be established on the bachelor, master and Ph.D. levels, and their requirements are prescribed in NOKUT's Academic Supervisions Regulations and in the Ministerial Regulations. Accreditation of new programmes is conducted either by NOKUT or by institutions with self-accreditation authority, based on the same set of programme requirements. Whether an institution must apply to NOKUT for accreditation of a new study programme, or whether it can self-accredit a new programme, depends on the institutional accreditation of the institution as described in chapter 1.3. The vast majority of new programmes are established based on an institution's authority to self-accredit. NOKUT only accredits study programmes for non-accredited university colleges on all levels and for university colleges or specialised university institutions that wish to establish a new doctoral or master programme outside their doctoral fields.

Non-accredited university colleges who wish to acquire self-accreditation authority or accredited institutions who wish to expand their authority can apply for institutional accreditation. There exist three types of institutional accreditations: accreditation as a university college, as a specialised university institution and as a university. Requirements for the various types of institutional accreditations comprise both common requirements that apply for all types of institutions and specific ones for each type. Accredited university colleges and specialised university institutions acquire self-accreditation authority on the bachelor level in all fields, as well as on the master level within their doctoral field. Universities have self-accreditation authority on all programme levels.

At the centre of NOKUT's external quality assurance activities is the institutional quality assurance audit. All institutions must pass the audit periodically, regardless of whether the institution is accredited as an institution or whether it only provides accredited study programmes. The aim of the audit is to verify whether the institution's internal quality assurance ensures educational quality and stimulates improvement. NOKUT also verifies whether the institution systematically conducts follow-up of the accreditation requirements for study programmes, see ESG 2.3 for more information. An audit can reveal the need to carry out a supervision or revision of accreditation of a study programme or institution.

Whenever NOKUT detects quality deficiencies through the institutional quality assurance audit or other activities, NOKUT can decide to supervise a study programme or an institution based on the same set of criteria that apply for accreditation. A supervision can address one programme, a whole field of programmes, or a specific theme in all programmes in the whole sector. NOKUT can also supervise an institution, addressing all or relevant requirements for institutional accreditation. Supervisions have been developed in order to apply a more effective and targeted approach than revisions, as NOKUT signalled during the previous ENQA review in 2013.

Supervision is conducted in various stages. Initial stages include an explorative and mapping stage, and an accounting stage where the institution is invited to provide further information. In a dialogue, NOKUT can work with the institution to clarify and to devise measures for correction and improvement when deficiencies are of a technical nature. For the final stage of supervision, NOKUT relies on external peer experts. This stage can involve a site visit. The final phase is a light version of a revision that usually only addresses specific criteria. Through supervision, NOKUT can require rectifications in order for programmes or institutions to comply with the requirements. However, a supervision cannot result in the revocation of a programme or institutional accreditation.

Some supervisions of programmes have revealed the necessity to revise programme accreditations. A programme or institutional revision is a comprehensive procedure that can result in the revocation of an accreditation and addresses not only specific but all requirements. NOKUT can revise both study programmes accredited by NOKUT, and those accredited by an institution with self-accreditation authority. NOKUT can do so at any time and for any reason, meaning that revision is a strong counterpart to the trust-based system with broad self-accreditation authority, creating a system in balance. An example of a supervision that has resulted in the initiation of revisions is the supervision with institutions' external cooperation, which began in 2014 and is in its final stages. This supervision process resulted in revisions of 13 programmes that showed serious deficiencies in the accounting and dialogue stage of the supervision process.

The pilot project on combined education and research evaluations is not an integral part of this interlinked model. The pilot project is conducted in cooperation with the Norwegian Research Council. It aims at developing a model for joint academic evaluation of education and research, and testing the model in conjunction with the Norwegian Research Council's evaluation of Norwegian social science research. The overall objective of the joint evaluation is to develop a method that will allow NOKUT and the Norwegian Research Council assess the quality of education and research and understand the interplay between them. The pilot will run from 2017 to 2018 targeting three social science disciplines in Norway, political science, sociology and economics. The model includes three sets of evaluations: an evaluation of research, an evaluation of education, and finally an evaluation of the interplay between research and education. NOKUT has learned that the pilot's methods have shown to be promising to achieve the aim of incorporating the knowledge base (see chapter 7) to a larger degree into our quality assurance activities. This will have a spill-over effect (see chapter 13 on areas for future development).

Accordingly, NOKUT's quality assurance activities are interlinked. They allow NOKUT to apply different supervisory procedures depending on what it deems necessary in order to ensure educational quality in the most efficient and effective way. Even though the activities differ in scope and content, all of the activities share certain foundational features. The criteria are based on explicit legal requirements, NOKUT uses peer experts in all processes, all of the activities require a form of self-evaluation from the HEI, the result of the activity is a written report, and the majority of them can lead to sanctions. Below we describe each of the activities in detail.

8.2 Overview of NOKUT's external quality assurance

NOKUT's external quality assurance				
COMONENTS TYPE	Assessment criteria	Procedure and methodology	Conclusions and report	Volume and outcomes
Institutional quality assurance audit	<p>The Ministerial Regulations sections 2-1 to 2-3 set criteria for the institutions' internal quality assurance, the overall procedure for NOKUT's audit and its sanctions.</p> <p>NOKUT's Academic Supervision Regulations section 4-1 set the criteria for NOKUT's audit and section 5-3 specifies which criteria apply in both Regulations. Section 5-6 regulates the composition of the expert panel.</p>	<p>Cyclical audit, 6-year intervals.</p> <p>Peer-review assessment by external expert panel of:</p> <ul style="list-style-type: none"> - Steering documents from the institution - Documentation from a pre-selected representative sample of study programmes covering 20% of the institutions' portfolio - The institution's self-evaluation <p>Expert panel: institutional management, quality assurance experience, academic requirements, affiliation to a foreign institution, a student representative on the institutional level.</p> <p>Site visit and interviews.</p>	<p>The expert panel produces the report with the support of NOKUT's administration.</p> <p>Before finalisation, the report is sent to the institution for correction of factual inaccuracies.</p> <p>NOKUT's Board decides if the institution's quality assurance comply, have some deficiencies, or have serious deficiencies.</p> <p>The Boards' decision, the report and the institution's comments to the report are published on NOKUT's webpage.</p> <p>In case of deficiencies, the institution is re-assessed within 3-12 months. After a re-assessment, a negative audit decision leads to the withdrawal of self-accreditation authority.</p>	<p>NOKUT has concluded two rounds of audits, the first from 2003 to 2011 and the second from 2009 to 2016. The third round of audits was initiated as a pilot in 2017, and ordinary audits will begin in 2019.</p>

<p>Institutional accreditation</p> <ul style="list-style-type: none"> - University college - Specialised university institution - University 	<p>The Ministerial Regulations section 3-5 set common criteria related to primary activities, organisation and general procedural requirements.</p> <p>The Ministerial Regulations sections 3-5 to 3-8 set criteria for each type, related to education, research, staff, study programmes and Ph.Ds.</p> <p>NOKUT's Academic Supervisions Regulations section 3-1 set additional common criteria and section 5-1 set procedural rules. Section 5-6 regulates the composition of the expert panel.</p>	<p>Institution notifies NOKUT and subsequently submits application.</p> <p>Peer-review assessment of application for institutional accreditation by external expert panel.</p> <p>Expert panel: institutional management, academic requirements, affiliation to a foreign institution, a student representative on the institutional level, representatives from the labour market or society.</p> <p>For university accreditation, the expert panel is joined by sub-committees consisting of field experts in the doctoral field of the applicant. The sub-committee advises the main committee.</p> <p>Site visit and interviews.</p>	<p>The expert panel produces the report with the support of NOKUT's administration.</p> <p>Before finalisation, the report is sent to the institution for correction of factual inaccuracies.</p> <p>NOKUT's Board decides whether to award institutional accreditation based on the panel's report.</p> <p>The Board's decision, the report and the institution's comments on the report are published on NOKUT's webpage.</p> <p>Should NOKUT's Board award an institutional accreditation, the applying institution must apply to the Ministry of Education and Research to change its institutional category.</p> <p>The result of a positive decision is the institution's right to use the protected title of the institutional category concerned, as well as the granting of self-accreditation authority.</p>	<p>NOKUT is currently processing two applications for university accreditation and one application for specialised university institution accreditation.</p> <p>Since the previous ENQA review, NOKUT has accredited four university colleges and rejected two applications.</p>
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<p>Programme accreditation:</p> <ul style="list-style-type: none"> - bachelor - master - Ph.D. 	<p>NOKUT's Academic Supervisions Regulations sections 2-1 to 2-6 set general criteria, criteria for the programme and its teaching staff, a specific exception ground for staff criteria, specific requirements for joint degrees and for artistic Ph.Ds. Section 5-1 sets procedural rules. Section 5-6 regulates the composition of the expert panel.</p> <p>The Ministerial Regulations sections 3-1 to 3-4 prescribe the general requirements for programme accreditation and set additional requirements for accreditation of master programmes, Ph.Ds. and artistic Ph.Ds.</p> <p>The Ministerial Regulations sections 4-1 to 4-3 set criteria for joint degrees.</p>	<p>Institution notifies NOKUT and subsequently submits an application.</p> <p>Peer-review assessment of application by an external expert panel.</p> <p>Expert panel: relevant experience on a higher academic level than the one being accredited and international experience for master and Ph.D.-level applications. In addition, NOKUT has included a student representative since the fall of 2017.</p> <p>For Ph.D. accreditation, the expert panel must formally include a professor and a student. NOKUT's expert panel conducts a site visit and interviews for Ph.D. accreditations.</p>	<p>The expert panel produces the report with the support of NOKUT's administration.</p> <p>The report is read and approved by the Head of Accreditation.</p> <p>Before finalisation, the report is sent to the institution for correction of factual inaccuracies. The applicant can also correct negatively assessed requirements. The expert panel re-assesses these and includes this final assessment in its report.</p> <p>The Director of Quality Assurance decides on study programme accreditation.</p> <p>The Director's decision and the report, including the institution's comments on the report, are published on NOKUT's webpage.</p> <p>A positive accreditation decision results in a permanent accreditation that will be subject to follow-up and, if necessary, may be revoked through revision.</p>	<p>In 2016, NOKUT received 23 applications for bachelor programmes, 21 applications for master programmes and two applications for Ph.D. programmes.</p> <p>In 2017, NOKUT received 13 applications for bachelor programmes, 8 applications for master programmes and 4 applications for Ph.D. programmes.</p>
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<p>Supervision of programmes and institutions</p>	<p>The criteria used vary according to the focus, scale and scope of the monitoring activities. However, all criteria are selected from the criteria for programme accreditation in NOKUT's Academic Supervisions Regulations and the Ministerial Regulations.</p> <p>Additional procedural rules are set in NOKUT's Academic Supervisions Regulations section 5-2. Section 5-6 regulates the composition of the expert panel.</p>	<p>After having chosen a focus (theme/ issue area/discipline), assessment criteria are formulated and institutions notified.</p> <p>Peer-review of documentation from the institution. Examples include:</p> <ul style="list-style-type: none"> - Original documents from institutions - The institution's self-assessments - Quantitative data extracted from national database <p>Expert panel for supervisions: NOKUT has recently introduced the same composition requirements as those that apply for revision. Prior to this, as supervision was not regulated as detailed, expert panels were composed as deemed fit for purpose.</p> <p>For supervisions with a technical or administrative focus, NOKUT might choose not to include external experts and instead undertake administrative assessments.</p>	<p>Supervisions do not immediately lead to loss of accreditation, therefore NOKUT makes no formal decision. NOKUT may require an institution to rectify deficiencies within a deadline, if necessary.</p> <p>All supervision processes are reported either in a letter to the institution, or, in the case of a larger activity, a full report is published. Both are available to the public. A meta-report with an analysis and summary of the results is also made for large-scale thematic supervisions.</p>	<p>Supervisions of all master degree programmes in the field of humanities (historical-philosophical subjects) from 2012 to 2014.</p> <p>Supervisions of bachelor programmes in child welfare, social work and social education from 2015 to today.</p> <p>Thematic supervisions of all study programmes with institutional partnerships from 2014 to today.</p> <p>Supervision of Nord University to assess the institution's compliance with requirements for university accreditation from 2015 to 2016.</p> <p>Supervisions of study programmes in building/engineering from 2017 to today.</p>
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<p>Revision of institutions and programmes</p>	<p>The same criteria for accreditation of programmes and institutions apply. In a revision, NOKUT addresses all criteria.</p> <p>The Ministerial Regulations sections 3-9 to 3-10 and NOKUT's Academic Supervisions Regulations section 5-2 contain specific procedural rules for revisions. NOKUT's Academic Supervisions Regulations section 5-6 regulates the composition of the expert panel.</p>	<p>NOKUT's Director General decides to initiate a revision when other options are exhausted.</p> <p>Peer-review assessment of self-evaluation and original documents from the institution by external expert panel.</p> <p>Expert panel for programme revision: relevant experience on a higher academic level than the one under supervision, professorship for Ph.D. programmes, international representation and a student.</p> <p>Expert panel for institutional revision: the same as for institutional accreditation.</p> <p>Site visit and interviews.</p>	<p>The report is sent to the institution for correction of factual inaccuracies.</p> <p>NOKUT's Board decides whether the accreditation is maintained or not.</p> <p>In case of a negative decision, the institution is given a time period of no more than two years to rectify deficiencies. A re-assessment is made, and if the outcome is still negative, the Board revokes the accreditation.</p> <p>The Board's decision(s), the report and the institution's comments on the report are published on NOKUT's webpage.</p> <p>In case of a negative revision of an institutional accreditation, the Board's decision to revoke the accreditation is sent to the Ministry, which enacts NOKUT's decision.</p>	<p>Since September 2013, NOKUT has conducted 19 revisions. Out of these, 12 programs had their accreditation revoked, while 7 programs maintained their accreditation.</p>
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Pilot on Combined Education and Research Evaluations	<p>Evaluation criteria for educational quality and interplay developed by NOKUT in conjunction with external reference group based on NOKUT's policy document 'Quality Areas for Study Programmes' and a scientific report by the Nordic Institute for Studies in Innovation, Research and Education (NIFU).</p>	<p>NOKUT was tasked with executing the evaluation by the Ministry of Education and Research. Evaluation criteria were developed and institutions invited to participate.</p> <p>Peer-review assessment by external expert panels of:</p> <ul style="list-style-type: none"> - Self-evaluation - Original documents from the institutions - Quantitative data from national databases and NOKUT's study barometer. <p>Expert panel: International experts in permanent academic position with experience in teaching and educational leadership.</p> <p>Follow-up questionnaire from the expert panel.</p>	<p>The report is sent to the institution for correction of factual inaccuracies.</p> <p>Expert panels will finalise their reports, and these will be published and publicly available in June 2018.</p> <p>These evaluations will have no formal outcomes.</p>	<p>Participation in the evaluation is voluntary. Sixty-one bachelor, master and Ph.D. programmes from 11 institutions are under evaluation. The project is expected to run until mid-2018.</p>
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Table 4. NOKUT's external quality assurance activities

ATTACHMENTS AND FURTHER INFORMATION

- NOKUT's reports on initial accreditation of study programmes: <https://www.nokut.no/en/publications/accreditation-and-quality-assurance/>
- NOKUT's reports on other quality assurance activities (in Norwegian only): <https://www.nokut.no/publikasjoner/akkreditering-og-tilsyn--hoyere-utdanning/>

PART IV: COMPLIANCE WITH THE EUROPEAN STANDARDS AND GUIDELINES

9 Compliance with the European Standards and Guidelines (part 3)

9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

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.

Guidelines:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.

A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

NOKUT's mission, its strategy and their translation into our daily work

NOKUT's main mission concerning Norwegian higher education is to conduct external quality assurance activities and focuses on both accountability and enhancement of Norwegian higher education: *NOKUT supervises, provides information about and contributes to developing the quality of Norwegian study programmes and institutions (...)*. NOKUT's mission and external quality assurance activities are embedded in the legal framework described in chapter 1.2. For more information on our mission, see NOKUT's Development Strategy for 2015-2020 that is described in chapter 3.1. This strategy also contains specific goals and sub-strategies for our external quality assurance activities, which operationalise NOKUT's mission.

NOKUT's internal quality assurance system described in chapter 4 ensures that the goals and sub-strategies for quality assurance are translated into our daily work and that they are achieved. This is part of the annual cycle, containing an annual plan, concrete steering parameters for specific projects, actions, as well as their follow-up in NOKUT's annual report.

All of the relevant laws and regulations are available online, as is NOKUT's Development Strategy 2015-2020.

These steering organisation-wide documents may not be well known by each of the staff, however they guide the priorities for each of the departments, and the management is responsible for ensuring their follow-up.

External QA activities as defined in Part 2 of the ESG, in addition to other activities

NOKUT carries out a variety of external quality assurance activities. Institutional quality assurance audits, supervisions and revisions of programmes and institutions, initial accreditations, and evaluations are all part of NOKUT's quality assurance activities portfolio. See chapter 8 for overview information on our quality assurance activities, and chapter 10 for more detailed information on each activity per standard of ESG Part 2.

As described in supporting activities for quality assurance activities found in chapter 7, NOKUT carries out a large number of other activities. Several of these activities are quality enhancement-oriented. NOKUT's stakeholder survey (see chapter 5) indicates that at times, it is difficult for the HEIs to distinguish between activities that are enhancement-oriented and activities that are control-oriented. In response to these concerns, NOKUT established a separate organisational unit in 2016 (the Section for Evaluation and Quality Enhancement). All of NOKUT's enhancement activities are located in either this section or in the Department of Analysis and Development. NOKUT's enhancement activities also focus on providing Norwegian HEIs with information they can use to improve their educational quality. However, informing our stakeholders about the differences between enhancement- and assurance-oriented activities continues to be a challenge. NOKUT is well aware of this and continually works to improve our communication and the way we engage stakeholders in the different processes.

Involvement of stakeholders and NOKUT's Board

NOKUT is governed by a board comprised of members with backgrounds from the various stakeholders. More information on the Board's functions can be found in the description of NOKUT's organisation in chapter 2.2.

NOKUT's stakeholders, how they are engaged and how they perceive NOKUT and its work, are mentioned in chapter 5. When NOKUT develops new procedures and methods, we often use reference groups with experts from Norwegian HEIs, in addition to larger conferences and hearing procedures.

NOKUT's Board adopts the strategy and mission statement. NOKUT has also received useful input from the dialogue with the higher education sector, the tertiary vocational education sector and other sectors in society. In carrying out its mission, NOKUT emphasises dialogue and cooperation with students, education institutions, societal stakeholders and other governmental agencies.

In its daily work, NOKUT uses experts in all of its external quality assurance activities. For a number of activities, NOKUT also uses international experts. The use of experts ensures both (discipline) expertise and the inclusion of stakeholder perspectives in our quality assurance processes. For more information, see chapter 8.2., which provides an overview of our quality assurance activities, and especially ESG 2.4. on peer-review experts.

NOKUT maintains a good relationship with its stakeholders (both the sector, students, the labour market and the Ministry). This is due to three factors: (1) NOKUT often meets its stakeholders on conferences and in meetings, keeping up-to-date on their needs and concerns; (2) NOKUT involves its stakeholders as described above; and (3) when challenges or ambiguities arise, NOKUT is quick to engage in a dialogue and, where necessary, improves its processes.

9.2 ESG Standard 3.2 Official status

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

Guidelines:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

NOKUT was established by the Norwegian Parliament when the Universities and Colleges Act of 2002 was adopted. Through this law, NOKUT is granted the status as the only authority that officially accredits Norwegian higher education institutions and provision and supervises their educational quality.

The Universities and University Colleges Act contains NOKUT's powers and mandate in section 2-1, and states that "*NOKUT is a professionally independent government agency*". In addition, section 2-2 of the Universities and University Colleges Act regulates NOKUT's Board, which "*has overall responsibility for NOKUT's operational activities and the decisions it makes*".

The Universities and University Colleges Act sets the general requirements that higher education programmes must be accredited either by the institutions themselves through their self-accreditation authority or by NOKUT, and the requirement for institutions to periodically undergo an institutional quality assurance audit carried out by NOKUT. Programme accreditation is also a requirement for the issuing of students grants and loans, which means it is of crucial importance for recruitment of students.

For details, see our legal framework in chapter 1.2, quality assurance in Norway in chapter 1.3 and NOKUT's history and mandate in chapter 2.1.

9.3 ESG Standard 3.3 Independence

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.

Guidelines:

Autonomous institutions need independent agencies as counterparts. In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;

- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;

- Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

Organisational independence

NOKUT is an independent public agency governed by its Board, as explicitly stipulated in the Universities and University Colleges Act sections 2-1 and 2-2. NOKUT's Board appoints NOKUT's Director General. The Act requires members of the Board not to hold leading positions or office at higher education institutions. The Ministry of Education and Research can only directly influence NOKUT's organisation through regulatory changes, which require extensive public consultations. Changes to the Universities and University Colleges Act must be adopted by the Parliament.

The University and University Colleges Act stipulate that NOKUT is the sole responsible agency for quality assurance of Norwegian higher education and the law gives NOKUT broad powers to fulfil its mission without government interference.

For more information, see chapter 1.2 on the legal framework and chapter 2.2 on NOKUT's Board.

Currently, changes in the legislation that regulates NOKUT (Universities and University Colleges Act section 2-1) are subject to a hearing procedure.

Operational independence

As described in chapter 1.2 on the legal framework, NOKUT is responsible for adopting regulations that specify requirements for quality assurance, pursuant to the provisions in the Universities and University Colleges Act and the Ministerial Regulations. It is NOKUT's responsibility to ensure that all HEIs follow these laws and regulations. In doing so, NOKUT is solely responsible for designing its own methods and procedures, and for making informed decisions about which issue areas, institutions, programmes or disciplines to supervise.

A minor exception is the Ministry of Education and Research's ability to instruct NOKUT to conduct evaluations for quality assessment purposes. This in itself does not impede on NOKUT's operational independence, but it may steer resources away from other external quality assurance activities. To date the Ministry has, with only minor exceptions, provided extra funding for such evaluations.

Independence of formal outcomes

As described in chapter 2.1, NOKUT's independence is stipulated in the University and University Colleges Act and guaranteed by its Board. NOKUT's decisions are not subject to political or any other third party influence.

All experts are informed that they act in a personal capacity and not as a representative for their own organisation. The Board is the ultimate arbiter of all decisions related to NOKUT's institutional quality assurance audits, institutional accreditation and revision, revision of programme accreditation on all levels, as well as programme accreditations of doctoral degrees. The Board has delegated its decision-making powers for programme accreditation on bachelor and master levels to NOKUT's administration.

NOKUT does not experience pressure from HEI's, nor the Ministry. Examples of challenging decisions that NOKUT has made in the past, are negative audit decisions for some of Norway's largest institutions in the second round of audits on institutions' quality assurance systems. Although these institutions rectified their deficiencies and NOKUT reached a positive decision after re-evaluation with an expert panel, they received substantial public attention and created discussion, without political or ministerial involvement. NOKUT has also initiated revisions of study programmes that institutions themselves, not NOKUT, have accredited based on their self-accreditation powers. This created discussion at first but is now widely accepted.

9.4 ESG Standard 3.4 Thematic analysis

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

Guidelines:

In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts. A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

NOKUT's analyses of general findings of quality assurance activities

An important part of NOKUT's mission and strategy is to collect and disseminate information about the quality of Norwegian higher education. As described in chapter 2.2 and chapter 7, NOKUT's Department of Analysis and Development is tasked with collecting, organising and managing significant amounts of publicly available data on the quality of Norwegian higher education. NOKUT ensures that this data is available on multiple data portals, and that institutions get direct access to the raw data from NOKUT's surveys. In addition, the Department has highly skilled staff that use the data to conduct structured analysis of critical issues related to educational quality. The Department also conducts other relevant analysis where they collect additional data from interviews with academic staff, administrators and students. NOKUT publishes all of these analyses as reports on its website, and arranges public breakfast meetings to launch and disseminate these reports. Every year a significant number of reports are published on NOKUT's website.

NOKUT also conducts analyses, writes and publishes reports, related to our own regulations, procedures and methods.

In addition to published reports, NOKUT also analyses and writes reports on external quality assurance activities that we do not publish. These reports are intended to evaluate and provide NOKUT's staff with formative information on how to improve our methods and processes.

Examples include a recent in-depth quantitative and qualitative analysis of accreditation reports and decisions, which is now in a final phase. The report comprises an analysis of 87 accreditation reports on the bachelor, master and doctoral levels published in 2012-2017. This analysis constitutes a backbone for the ongoing internal process of developing a new model for programme accreditation.

NOKUT also conducted an analysis of all the concluding reports from the second round of the institutional audits, spanning from 2008 to 2016. Although the report was not published, it was valuable for the development of NOKUT's new model for institutional audits.

Reflections

However, this is done at a smaller scale and less systematically compared to the analysis of the quality of Norwegian higher education, and not all reports are published. To some degree, NOKUT has faced a trade-off with regard to its analyses work. As discussed throughout this report, NOKUT and the higher education sector has been through significant changes during the last three to four years. The government's structural reform (see chapter 1.1) and corresponding changes to the legal framework, including the development of NOKUT's new regulations made it necessary for NOKUT to prioritise the development of new guidelines, procedures and methods. At the same time, NOKUT is fortunate to have access to large amounts of data on educational quality. This has allowed NOKUT to continue disseminate high quality analyses that can help institutions improve their education.

However, this does not mean that NOKUT has neglected to evaluate its own processes on a regular basis. NOKUT's staff members regularly discuss processes, methods and outcomes at section, department and management meetings, ensuring both internal peer review and knowledge dissemination. NOKUT is also planning to publish the recent analyses it conducted based on 87 programme accreditation reports and on the second round of institutional audits in early 2018. Nevertheless, NOKUT is aware that its methods and processes could become even better with a more systematic approach to this issue. In the newly developed quality handbook (see chapter 4), NOKUT has established an evaluation routine for all quality assurance activities that includes a systematic review of our own methods and processes. These shorter evaluation reports will thoroughly assess our projects and processes, and enable aggregated thematic analysis of our own work.

9.5 ESG Standard 3.5 Resources

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

Guidelines:

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

NOKUT's financial resources

NOKUT is financed by the national budget adopted by Parliament, and is subject to regulation by the Ministry of Education and Research.

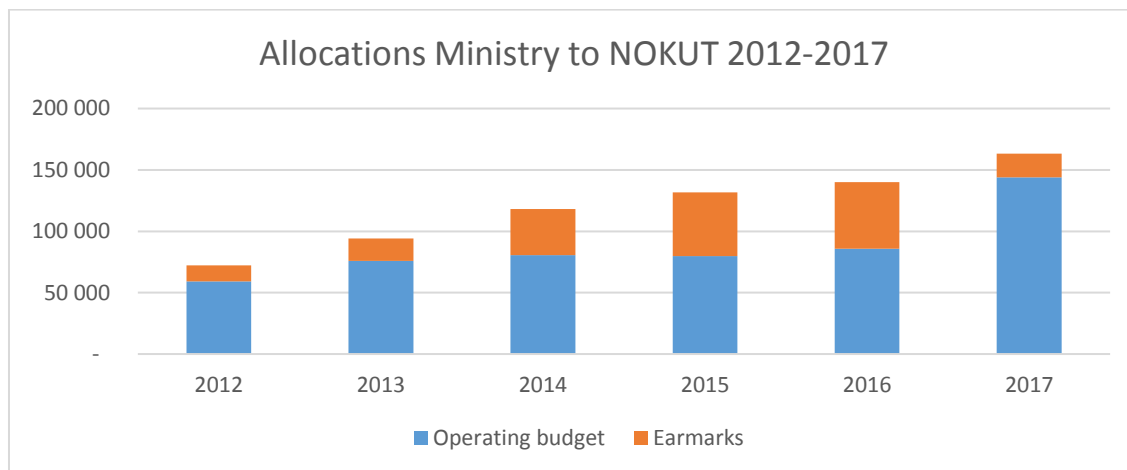


Figure 3. Allocation to NOKUT 2012-2017. Numbers in 1000 Norwegian kroner.

Figure 3 shows allocations to NOKUT as a whole, including tasks and activities outside the scope of the ESG. NOKUT's operating budget for 2017 is NOK 143.895.000. In addition, the Ministry allocated NOK 19.260.000 in earmarks to pay for special projects and evaluations they instructed NOKUT to conduct. Accordingly, NOKUT's total budget for 2017 is NOK 163.155.000. The rise in earmarks from 2012 to 2016 reflects a growing number of tasks and projects that NOKUT was assigned by the Ministry. In 2017, much of this was moved from earmarks to the operating budget.

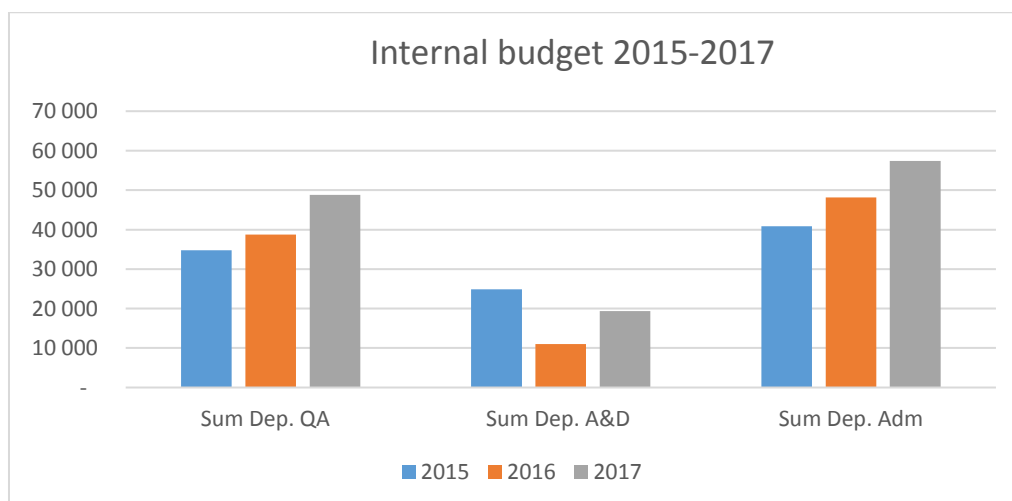


Figure 4. NOKUT's internal budget. Numbers in 1000 Norwegian kroner.

Figure 4 shows the total budgets (including earmarks) for the Department of Quality Assurance, the Department of Analysis and Development and the Department of Administration.

In 2017, the budget for the Department of Quality Assurance is NOK 48.825.000, covering NOK 20.725.000 for organisational expenses and NOK 28.100.000 for wages. The Department of Analysis and Development has a budget for 2017 of NOK 19.346.000, consisting of NOK 7.120.000 for

organisational expenses and NOK 12.226.000 for wages. In the Department of Administration's budget, the organisational budget is significantly higher due to the nature of its costs (i.e. IT, development of new data systems, office rent).

The internal budget of the Department of Communication only represents a small share of NOKUT's total budget. The internal budget of the Department of Foreign Education falls outside the scope of this review.

The budget allocation letter for 2017 and annual reports from 2016 and 2017 are available on our website. NOKUT's annual reports include, among other things, use of resources, plans and budget. Accounting and staff data are reported to the Database for Statistics on Higher Education (DBH).

NOKUT's human resources

Due to increased activity, NOKUT has increased its number of staff the past few years and currently has about 144 employees. This is mainly due to new powers and activities for the Department of Foreign Education, but the Department of Quality Assurance and the Department of Analysis and Development have also seen a rise in staff numbers to cover expanding activities.

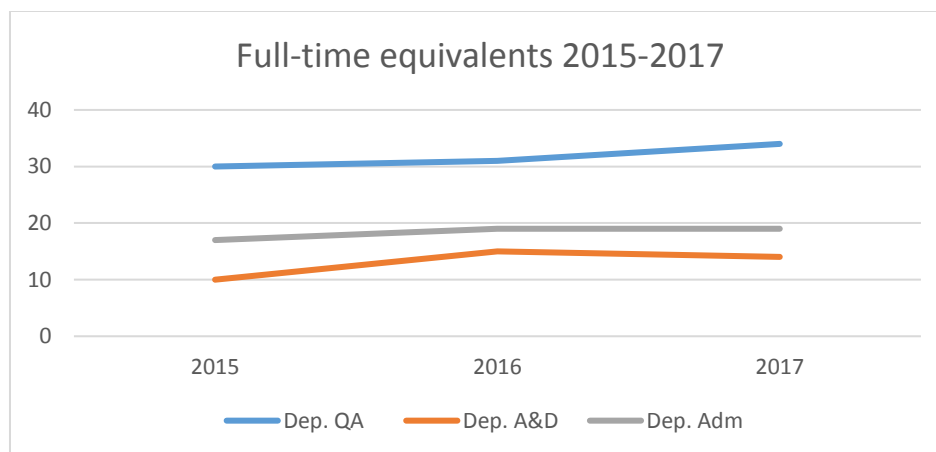


Figure 5. Full-time equivalents for the period 2015-2017, shown for the Department of Quality Assurance, the Department of Analysis and Development and the Department of Administration

Reflections

NOKUT is a well-funded agency. Over the last few years, NOKUT's activity portfolio has increased, but so has the funding NOKUT receives from the Government. Yet like other organisations, NOKUT must prioritise its activities based on its financial and human resources. Several challenges bear mentioning. NOKUT is unable to control the levels of some of its activities. That is, NOKUT cannot control how many educational provisions it must accredit at any one point. The same is the case for institutional accreditations. NOKUT is also responsible for accrediting educational provisions and institutions for vocational tertiary education, and here too NOKUT must process all applications that we receive. Complicating this problem further are the recent structural changes among HEIs in Norway (see chapter 1). Because of the many mergers, new policies and regulations issued by the Ministry of Education and Research, there is an increase in accreditation applications that take more time and are significantly costlier, e.g. applications to become a university and Ph.D.-level education provisions.

In addition, NOKUT is responsible for individuals seeking recognition of their foreign education. Here, too, NOKUT cannot control how many individuals apply to have their foreign education recognised. During the last few years, the number of applications has risen steadily, putting pressure on NOKUT's financial and human resources. However, the government has increased its funding for our recognition activities significantly in the last few years.

In sum, even though NOKUT is well funded, external factors can significantly affect NOKUT's financial situation. This requires a careful prioritisation of financial and human resources even in times of financial surplus, and NOKUT's Board and management are well aware of these challenges.

Two recent examples of prioritised areas testifies NOKUT's commitments to continuously improve its quality assurance activities: the development of more efficient and better accreditation procedures, and the strengthening of supervisory activities.

In addition, a positive evolution must be mentioned. In 2017, a significant amount of earmarked budget has been moved to operating budget, as visible in figure 3. This happened at NOKUT's request, as a number of projects had become permanent tasks.

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

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

Guidelines:

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are on-going so as to ensure that their services to institutions and society are optimal. Agencies apply an internal quality assurance policy which is available on its website.

This policy

- ensures that all persons involved in its activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;
- guards against intolerance of any kind or discrimination;
- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;
- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;
- allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

NOKUT's internal quality steering system, its internal quality assurance of each of its activities in the quality handbook, and the way they are interlinked are all described in chapter 4.

NOKUT's Internal Quality Steering System ensures quality in deliveries and good and efficient management, and contributes to better processes for learning and enhancement. The system as a whole ensures internal quality assurance and compliance with the requirements for public administration in Norway, as well as for the accountability rules for its finances. Based on the system's results, made available in biannual reports, NOKUT identifies measures for improvement and specifies their follow-

up. The Internal Quality Steering System forms the foundation for the development of NOKUT's annual report and annual plan.

The quality handbook (NOKUT's quality assurance system) ensures the quality of NOKUT's activities by ensuring that the entire Department of Quality Assurance uses established routines, checklists and standard protocols in their work. The routines, checklists and protocols are described under each process in the handbook. This includes routines for evaluating projects, the use of experts, appeals processes, handling indications of quality deficiencies, quality assurance of NOKUT's projects and processes and updating the quality handbook. We also describe our non-conflict of interest mechanism, our ethical guidelines and the way we train our experts.

As we describe in chapter 4, the quality handbook is a recent innovation. As discussed above, NOKUT has, during the last few years focused on developing new regulations, guidelines, procedures and methods. During this developmental period NOKUT's internal quality procedures were less systematised and managers (Department directors and heads of sections) were responsible for ensuring the quality of their department/section's work through e.g. internal evaluation meetings.

9.7 ESG Standard 3.7 Cyclical external review of agencies

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

Guidelines:

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.

NOKUT has been reviewed and found to be in compliance with the ESG both in 2008 and in 2013. The review in 2013 was coordinated by ENQA. These external reviews formed the basis for the prolongation of NOKUT's membership in ENQA. NOKUT has been registered in the European Quality Assurance Register for Higher Education since May 2014.

ATTACHMENTS AND FURTHER INFORMATION

- NOKUT's publicly available mission statement: attachment 4 or <https://www.nokut.no/en/about-nokut/development-strategy-201520202/>
- NOKUT's policy document Quality Areas for Study Programmes: attachment 5
- Development Plan for Culture and Competence: attachment 6
- Internal Quality Steering System: attachment 7
- Quality handbook: <https://cp.compendia.no/nokut/kvalitetssystem/?key=bf181ab8376859035164f94075e2a3a6>
- Rules and regulations: attachments 1, 2 and 3 (or <https://www.nokut.no/en/about-nokut/>)
- NOKUT's guidelines (in Norwegian only): <https://www.nokut.no/publikasjoner/veiledninger/>
- NOKUT's quality assurance reports in English (only some for study programme accreditation): <https://www.nokut.no/en/publications/accreditation-and-quality-assurance/>

- NOKUT's quality assurance reports in Norwegian:
<https://www.nokut.no/publikasjoner/akkreditering-og-tilsyn--hoyere-utdanning/>
- NOKUT's publications in English (a.o. research and analyses):
<https://www.nokut.no/en/publications/research-and-analyses/>
- Budget allocation letter 2017 (in Norwegian only):
<https://www.nokut.no/publikasjoner/arsrapporter-og-armsmeldinger/>
- ENQA Panel Report 2013: <https://www.nokut.no/om-nokut/internasjonalt-samarbeid/ENQA-evaluering/> and
https://www.nokut.no/globalassets/nokut/artikkelbibliotek/generell/enqa/review_of_nokut_report_of_the_enqa_panel_may_2013.pdf

10 Compliance with the European Standards and Guidelines (part 2)

10.1 ESG Standard 2.1 Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Guidelines:

Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.

Norwegian regulations on the implementation of the ESG

The Ministerial Regulations link NOKUT's activities with the European Standards' and Guidelines for Quality Assurance in the European Higher Education Area:

Section 2-1 (3) NOKUT shall, in consultation with the sector, issue regulations on criteria for the institutions' quality assurance practices. The criteria shall be in accordance with the requirements set out in Standards and Guidelines for Quality Assurance in the European Higher Education Area, ESG, as far as they are appropriate.

Section 2-2 (4) NOKUT shall issue regulations for the supervision of institutions' quality assurance practices. The regulations shall be in accordance with the requirements set out in European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as far as they are appropriate.

Overview of how the ESG Part 1 are addressed in NOKUT's activities

As described in chapter 1.2, NOKUT's Academic Supervisions Regulations set requirements for study programmes and their academic environments. Institutions are required to observe all requirements listed in these regulations for all their programmes.

The following sub-chapter will highlight how each activity addresses the standards in part 1 of the ESG. Although not all of the standards in part 1 are addressed in each individual activity, each standard is addressed in the entirety of NOKUT's external quality assurance activities, as part of the interlinked model of quality assurance in Norway.

Table 5 provides a summary of how the criteria in NOKUT's external quality assurance activities addresses each specific standard in part I of the ESG.

Consideration of internal quality assurance		External quality assurance activity			
		Institutional quality assurance audit	Programme accreditation, supervision and revision	Institutional accreditation, supervision and revision	Combined Education and Research Evaluations
ESG standard part I	1.1 Policy for QA	NOKUT Reg. §§ 4-1 (1), 4-1 (2), Act § 1-6		NOKUT Reg. § 3-1 (3)*	
	1.2 Design and approval of programmes	NOKUT Reg. § 4-1 (3)	NOKUT Reg. § 2-2 (1-4)	NOKUT Reg. § 3-1 (3)*	COM 3, 8 and 9
	1.3 SCL, teaching and assessment		NOKUT Reg. § 2-2 (5)	Min. Reg. § 3-5 (1)**	COM 4
	1.4 Student admission, progression recognition and certification		NOKUT Reg. § 2-2 (2), Act §§ 3-6 and 3-11	Min. Reg. § 3-5 (1)**	COM 2 and 7
	1.5 Teaching staff		NOKUT Reg. §§ 2-3, 2-4	Min. Reg. § 3-5 (1)**	COM 6 and 10
	1.6 Learning resources and student support	Act § 4-3 (4)	NOKUT Reg. § 2-2 (4), Act § 4-3 (4)	Min. Reg. §§ 3-5 (1)**, 3-5 (3)	COM 1, COM 5
	1.7 Information management	NOKUT Reg. §§ 4-1 (4), 4-1 (5), 4-1 (6), Act § 1-6		NOKUT Reg. § 3-1 (3)*	
	1.8 Public information	Min. Reg. § 2-1 (2)	NOKUT Reg. § 2-1 (2), Min. Reg. § 2-1 (2)		
	1.9 On-going monitoring and periodic review of programmes	Min. Reg. § 2-1 (2)	Min. Reg. § 2-1 (2)	NOKUT Reg. § 3-1 (3)*	
	1.10 Cyclical external quality assurance	Min. Reg. § 2-2		NOKUT Reg. § 3-1 (3)*	

Table 5. NOKUT's external quality assurance activities and ESG Part I

* Refers to the approval of the institutional quality assurance audit, which requires the fulfilment of criteria listed in corresponding ESG for audit.

** Though not assessed directly in initial institutional accreditations, these criteria are required by way of initial programme accreditation, which is necessary in achieving institutional accreditation

How the ESG Part 1 are addressed in each quality assurance activity

Below, NOKUT addresses for each of its quality assurance activities to which degree the standards and guidelines of ESG Part 1 are incorporated in the NOKUT's and the Ministry's Regulations and in the Universities and University Colleges Act.

➤ *Institutional quality assurance audit*

Section 5-3 of NOKUT's regulations set forth the criteria for the institutional audit, which include section 4 of the regulations, as well as sections 2-1 and 2-2 of the Ministerial Regulations and 1-6 of the University and University Colleges Act.

Firstly, ESG 1.1, *policy for quality assurance*, is addressed in a number of ways. According to the University and University Colleges Act section 1-6, "Universities and university colleges shall have a satisfactory internal quality assurance system in order to assure and further develop the quality of education." In NOKUT's regulations, "Quality assurance practices must be set out in a strategy and cover all areas of importance to the quality of the students' learning outcomes". The role of the management and quality culture, which NOKUT has defined as among others as being linked to democratic principles of openness and participation, is also addressed in NOKUT's regulations. This is found in section 4-1 (2), "Quality assurance practices must be imbedded in all levels of the institutions' leadership. Through their QA practices, institutions must promote a quality culture among staff and students."

ESG 1.2, *design and approval of programmes*, is addressed by way of section 4-1 (2) of NOKUT's regulations, "Institutions must systematically ensure that all study programmes meet the requirements set out in national laws and regulations, including any additional regulations stipulated by the institutions themselves." Institutions must have systems in place to design, approve and review their programmes, ensuring that the criteria for the initial accreditation are fulfilled. This is a striking example of the importance of the Norwegian interlinked model for quality assurance, in which the institutions themselves are responsible to uphold the standards for accreditation.

The audit also takes into account ESG 1.6, *learning resources and student support*. In the University and University Colleges Act section 4-3, "An institution's work with the learning environment must be documented and incorporated in the institution's internal quality assurance systems, pursuant to section 1-6 [of the University and University Colleges Act]", which in turn is assessed in the institutional quality assurance audit.

Information management (ESG 1.7) is an essential component in the institutional quality assurance audit and addressed in several subsections in NOKUT's regulations (section 4-1 (4-6)):

(4) Institutions must systematically collect information from relevant sources in order to assess the quality of all study programmes.

(5) Knowledge obtained through quality assurance practices must be used to enhance the quality of the institutions' study programmes and uncover instances of deficient quality. Deficient quality must be rectified within a reasonable time.

(6) Results derived from quality assurance practices form part of the knowledge base used in assessing and developing the institution's overall portfolio of study programmes.

The University and University Colleges Act section 1-6, which requires that HEIs have satisfactory internal quality assurance systems in place, also addresses ESG 1.7, and the act also states that student evaluations must be included in institutions' quality assurance systems.

The Ministerial Regulations require that institutions conduct periodic evaluations of their programmes, addressing ESG 1.9. These regulations also stipulate that, “The results of the evaluations shall be made public” touching upon ESG 1.8, *public information*. Like NOKUT, public HEIs are also subject to the Public Administration Act, which, with very few exceptions, stipulates that case documents, journals and records must be open for inspection and anyone can request access if the document is not already available.

The nature of the institutional quality assurance audit is cyclical, in accordance with ESG 1.10, *cyclical external quality assurance*. Section 2-2 (2) of the Ministerial Regulations stipulates that “No more than eight years shall elapse between each audit at individual institutions”.

➤ *Programme accreditation, supervision and revision*

The requirements for initial programme accreditation, supervision and revision of programme accreditations have been grouped together, as the supervision and revision assesses the fulfilment of the criteria for the initial accreditation awarded. Note, however, that in a supervision, NOKUT can select which requirements are pressing during the mapping stage and does not necessarily address all requirements.

Design and approval of programmes, ESG 1.2 is addressed in detail in NOKUT regulations’ subsections 1-4 of section 2-2:

(1) *The learning outcomes for the programme must be in accordance with the National Qualifications Framework for Lifelong Learning, and the programme must have an appropriate title.*

(2) *The programme must be academically up-to-date and have clear academic relevance for further studies and/or employment.*

(3) *The total workload of the programme must be between 1,500 and 1,800 hours per year for full-time students.*

(4) *The programme’s content, structure and infrastructure must be adapted to the programme’s learning outcomes.*

NOKUT has also incorporated *student-centred learning*, ESG 1.3, in its requirements for programmes in section 2-2 (5), “The teaching, learning and assessment methods must be adapted to the programme’s learning outcomes. The programme must facilitate students taking an active role in the learning process.”

ESG 1.4, *student admission, progression, recognition and certification*, is addressed in the University and University Colleges Act in section 3-6, which provides a detailed list of the overarching requirements for students’ admission to higher education, in addition to section 3-11, stipulating the regulations institutions must follow for awarding diplomas and certifications. It is also touched upon in NOKUT’s regulations in section 2-2 (2), which, as mentioned above, assesses the programme’s relevance for further studies and/or employment.

Regarding ESG 1.5, *teaching staff*, NOKUT places a heavy emphasis on the importance of the academic environment in programmes, and this is reflected in the requirements for the academic environment and teaching staff in the Academic Supervision Regulations. Sections 2-3 and 2-4 provide information on the requirements, with specific regulations for first, second and third cycle

programmes. The academic environment must have relevant educational competence, and academic staff must be actively engaged in research and academic and/or artistic development work.

Learning resources and student support, ESG 1.6, are also regulated and addressed in section 2-2 (4) of NOKUT's regulations, which, as mentioned above, stipulates that the content, structure and infrastructure be adapted to the learning outcomes of the programme. Additionally, the University and University Colleges Act, section 4-3 (4) requires that the learning environment is included in the institution's quality assurance system.

The requirements for accreditation also demand that "Information regarding the programme must be correct and show the programme's content, structure and progression, as well as opportunities for student exchange programmes," in section 2-1 (2) of NOKUT's regulations, addressing both ESG 1.8, *public information*.

Another programme requirement, found in section 2-1 (2) of the Ministerial Regulations, is that the institutions conduct periodic evaluations of the programmes, as mentioned above in the overview pertaining the institutional quality assurance audit. This addresses ESG 1.9, regarding *on-going monitoring and periodic review of programmes*. The results of the reviews must also be made public, in accordance with ESG 1.8, *public information*. As mentioned above, it is also a requirement for all public institutions as part of the Public Administration Act.

➤ *Institutional accreditation, supervision and revision*

Institutional revision of and institutional accreditation have been grouped together, as the revision assesses the fulfilment of the criteria for the initial accreditation awarded. The same applies for supervision, although a supervision only addresses selected criteria.

The requirements for institutional accreditation, supervision and revision are, by nature, those of NOKUT's activities that are involving the ESG Part 1 to a smaller extent. This is logical, as the Norwegian system applies an institutional quality assurance audit, which addresses those standards in ESG Part 1 that are applicable at the institutional level.

This said, the requirements for institutional accreditation, supervision and revision do require that "The institution's systematic quality assurance practices must be approved by NOKUT", as stipulated in NOKUT's Academic Supervisions Regulations section 3-1 (3). By doing so, the requirements for institutional accreditation, supervision and revision indirectly address ESG 1.1 referring to a policy for quality assurance, ESG 1.2 on the design and approval of programmes, ESG 1.7 on information management and ESG 1.9 on the on-going monitoring and periodic review of programmes, and ESG 1.10 on the cyclical external quality assurance.

In addition, several of the standards from ESG part 1 are addressed by the requirement listed in the Ministerial Regulations section 3-5 (1), that stipulates that, "Institutions that offer accredited study programmes may apply to NOKUT for accreditation as a university college, specialised university institution or university". Though not assessed directly in initial institutional accreditations, these criteria are required by way of initial programme accreditation, which is a requirement for achieving institutional accreditation. This applies to ESG 1.3 on student-centred learning, teaching and assessment, ESG 1.4 on student admission, progression, recognition and certification, ESG 1.5 on teaching staff and ESG 1.6 on learning resources and student support. The Ministerial Regulations section 3-5 (3) also address ESG 1.6 on learning resources and student support by requiring that "*The institution's organisation and infrastructure shall be adapted to its activities*".

➤ *Pilot on Combined Education and Research Evaluations*

The pilot on combined education and research evaluations takes into account a number of standards from part 1 of the ESG. Criterion 3, programme design, addresses ESG 1.2, *design and approval of programmes*. This criterion looks at the programme structure and learning outcomes, the coherence in the courses and study programme, in addition to how well the different courses allow students to achieve the intended learning outcomes. The programmes' internationalisation and relevance for students' future lives are two additional criteria that address ESG 1.2.

Secondly, ESG 1.3, *student-centred learning*, is accounted for by criterion 4 called teaching and assessment methods. This includes coherence in course content, teaching methods and assessment methods, specifically looking at how well programmes use varied and appropriate teaching and assessment methods and if there are/what kind of incentives in place to ensure this.

ESG 1.4, *student admission, progression, recognition and certification* is considered in criterion 2, which evaluates the initial competence of students by reviewing admission requirements and assessing the extent to which the students recruited have the initial competence to complete the programme. The criterion also evaluates the extent to which institutions provide activities to prepare new students for the demands of the programme. Criterion 7, achieved learning, also addresses ESG 1.4, reviewing students' satisfaction with the outcomes of the learning process and students' grades vs. workload.

ESG 1.5, *teaching staff*, is addressed in criterion 6, which evaluates the educational competence of instructors. This looks at the importance of teaching ability, also relative to research, in hiring decisions, work with improving the status of teaching and incentive programmes for teaching and further development of pedagogical competence. Educational leadership is yet another criterion that addresses 1.5, evaluating the academic management involved in the development of programmes.

When it comes ESG 1.6, *learning resources and student support*, experts also evaluate the organisational, economic, geographic and other conditions that may affect the programme quality under criterion 1. This is taken into account as a background for the evaluation as a whole as a way to better understand the institutions' situations. Also connected to 1.6 is the evaluation of the learning environment in study programmes, which largely focuses on student satisfaction with the social environment, academic environment and physical infrastructure. Part of this criterion 5 also involves assessing the extent to which other academically relevant activities exist in addition to the regular programme plan.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

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.

Guidelines:

In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.

The aims, objectives and implementation of the processes will
- bear in mind the level of workload and cost that they will place on institutions;

- take into account the need to support institutions to improve quality;
- allow institutions to demonstrate this improvement;
- result in clear information on the outcomes and the follow-up.

The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

We describe the relevant legal framework and NOKUT's role within the Norwegian higher education sector in chapter 1.2 and 1.3. For NOKUT's goals and sub-strategies for its quality assurance activities, refer to chapter 3.1 on the Development Strategy 2015-2020. In chapter 8, we describe NOKUT's external quality assurance activities.

In chapters 5, 7 and 8, we describe in detail how NOKUT works to support quality enhancement and allow institutions to demonstrate their improvement, how all of NOKUT's external quality assurance activities result in clear information, and how we involve stakeholders in our processes. For information on the follow-up of our activities, we refer to ESG 2.3.

Designing activities in accordance to their objectives

NOKUT's external quality assurance activities are designed with two goals in mind: first, to ensure that the quality of education is in line with NOKUT's criteria and stimulate institutions in continuously improving their education provisions, and second, to design targeted processes, which are efficient for NOKUT and the institutions. These goals are a part of operationalising NOKUT's mission, the overall goals for quality assurance and especially the sub-strategies mentioned in chapter 3.1.

NOKUT closely follows both international trends, innovations and good practices, as well as the changing needs and challenges of the Norwegian higher education sector. Both these and internal evaluations of how our regulations and procedures can be improved or updated, lead to continuous improvement.

Improving Regulations and procedures with the involvement of stakeholders

When NOKUT changes its regulations, NOKUT conducts a public hearing. NOKUT is otherwise free to develop an approach to changing the regulations or procedures, that fits the extent and the nature of the envisaged changes. Therefore, NOKUT does not apply a standardised approach. However, common characteristics of a process to introduce changes include the continuous involvement of the Board, as well as stakeholders and staff in the form of a project with a steering group or stakeholder reference group. The Board has decision-making power over changes in regulations or procedures. NOKUT discusses larger changes with the sector at specifically organised conferences. Examples of improvement processes throughout the last few years include:

- NOKUT's policy document 'Quality Areas for Study Programmes' was developed in 2015-2016 (see chapter 3.3). NOKUT engaged broadly with the sector and discussed early drafts of the document with NOKUT's Board and other stakeholders in various arenas, including NOKUT's biennial national conference for higher education.
- In the context of an evolving sector with a high degree of professionalism, NOKUT's focus has shifted from controlling institutions' quality assurance systems to ensuring that they continuously improve their programmes. This is reflected in the new Academic Supervision Regulations and Ministerial Quality Regulations. NOKUT's new Academic Supervisions Regulations of February

2017 also seek to concretise NOKUT's policy on 'Quality Areas for Study Programmes'. The spotlight of the new requirements for study programmes is on student-centred learning – an implementation of the new ESG 1.3., supported by innovations such as the requirement of academic leadership in programme level educational provision.

- NOKUT's new Academic Supervisions Regulations (see chapter 1.2) were discussed within NOKUT's Board multiple times, and NOKUT held meetings with the various stakeholders to discuss the regulations and receive input. The draft regulations were sent to a three-month public consultation process, in which all stakeholders were able to give written feedback. During the consultation period, NOKUT organised a consultation conference in order to meet with the entire sector to discuss the draft regulations. After the consultation process, relevant feedback was systematised and incorporated in a new draft. The results of the consultation process were also part of the decision-making material for NOKUT's Board. On 3 February 2017, NOKUT's Board adopted the new Academic Supervision Regulations, which came into force 9 February 2017 with transitional provisions for certain requirements.
- The new model for the institutional quality assurance audit is another example, following changes in the Ministerial Regulations and NOKUT's regulations. This is a natural evolution in a changing institutional landscape with university colleges merging together or with existing universities (see chapter 1.1) Accordingly, self-accreditation rights are becoming the norm for an increasing number of institutions. More than ever, the institutional quality assurance audit is at the centre of the system, which stresses the need for a thorough renewal in close cooperation with the sector. Due to its importance, the new audit model is put into practice through a pilot phase with the help of a stakeholder reference group. NOKUT seeks to ensure the system's effectiveness, however without compromising NOKUT's role as an autonomous guardian of quality in higher education.
- The fact that supervisions are less rigorously regulated than accreditations, revisions and audits has led NOKUT to use somewhat different procedures for different types of supervisions. After evaluating some of our supervision processes, we have initiated a process to develop a new standardised set of methods and processes, and have included these in the quality handbook. We believe these developments will increase the quality of our work and lead to greater transparency for the institutions.
- To develop and evaluate the pilot project on combined education and research evaluations, a reference group was created to collect feedback from the higher education sector and experts. The reference group consists of a number of deans. The reference group met during two phases of the project. The reference group was first asked to evaluate the proposed model and methodology before the evaluations began. When the pilot has been completed, the reference group will then be asked to review the results together with the project group, and based on the pilot, provide input into how the model can be used in a comprehensive model for combined subject-specific evaluations on education and research.

Evaluations of changes

Evaluations of changes in Regulations or procedures are an integral part of NOKUT's quality assurance system and the quality handbook (see chapters 4.1 and 4.2). Changes are evaluated automatically after a certain time-period. Possible improvements to NOKUT's guides are collected continuously and implemented in a larger round. Evaluations may also lead to changes in Regulations. A good example of ongoing evaluation is the new model for the institutional quality assurance audit.

Due to larger changes in the Regulations, the new model is first tested through a pilot phase in close cooperation with a stakeholder reference group and without repercussions for the participating institutions. An evaluation of the pilot will determine the future model for the audit.

In addition, when we detect that a new requirement does not function well, we do not wait for a larger evaluation round and pursue changes quickly. As a recent example, NOKUT has incorporated the change of a requirement as a steering parameter in the annual plan, as part of NOKUT's quality steering system.

10.3 ESG Standard 2.3 Implementing processes

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

Guidelines:

External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).

External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

NOKUT's external quality assurance activities are interlinked. They allow NOKUT to apply different supervisory procedures depending on what it deems necessary in order to ensure educational quality in the most effective way. Even though the activities differ in scope and content, all of the activities share certain foundational features. We provide an overview of the activities in detail in chapter 8, but elaborate on the specific elements of this standard and the differences between each of the activities here.

Self-assessment

For all of the activities, institutions submit a self-assessment or equivalent. For programme and institutional accreditations, institutions submit an application and supporting documentation. The applications vary in scope and detail, but NOKUT has developed guidelines that detail what should be addressed and which documentation should be included.

➤ *Institutional quality assurance audit*

In the second round of the institutional quality assurance audits, three issues for improvement that we experienced were that we did not use a standard self-evaluation form, that we did not ask all institutions for the same supporting materials, and that we did not have a standardised format for the reports. To avoid any risk of institutions perceiving themselves as treated differently from others, and to help the external experts make their assessments in a coherent and fair manner, NOKUT has addressed all of these issues in the third round of the institutional quality assurance audits.

For the audit, all institutions are now required to submit a standardised self-evaluation. The institution and management for programmes selected by NOKUT submit authentic documentation that highlight how the institutions' quality assurance activities fulfil the criteria specified in NOKUT's Academic Supervision Regulations. This includes, for instance, institutions' regulations, analyses, evaluation forms, etc. Both the institutional and programme management also submit a self-assessment, which aims to give the institution the opportunity to demonstrate how their practices comply with regulations that cannot be documented in any other way.

➤ *Initial programme and institutional accreditation*

For initial accreditation, institutions submit an application based on the criteria listed in the regulations, as well as supporting documentation. The applications vary in scope and detail, but NOKUT has developed guidelines that detail what must be addressed and which documentation should be included.

➤ *Supervision of programmes and institutions*

Supervisions are more flexible and can be directed to very specific requirements that may be rather limited in nature during the explorative and mapping stages. Because of this, NOKUT's management and the project leader for the supervision assess whether to use a comprehensive self-assessment for all requirements or develop a self-assessment targeting specific criteria for the supervision. We also request an explanation of how the documentation submitted by the institution can demonstrate that the requirements are fulfilled.

➤ *Revision of programmes and institutions*

The self-assessment for revisions of programme and institutional accreditation is based on the requirements for the initial accreditation of the programme or institution. Institutions must also provide supporting documentation that authenticate how they fulfil the requirements.

➤ *Pilot on Combined Education and Research Evaluations*

Participating institutions provide a self-assessment report with questions related to the nine quality dimensions defined in the joint evaluation.

External assessment / Site visit

All of NOKUT's procedures contain an external assessment for its external quality assurance activities, and the majority of them also a site visit.

➤ *Institutional quality assurance audit*

During a preliminary meeting before the site visit, the expert panel discusses internally how they will conduct interviews during the site visit and which themes must be addressed during each of the interviews, as well as prepare interview guides for each of the groups to be interviewed.

The institutional site visit normally takes two to four days, mainly depending on the size of the institution. Experts meet with relevant stakeholders, such as the institution's management, students,

student representatives, academic staff and those responsible for coordinating quality assurance practices at the institution.

➤ *Initial programme and institutional accreditation*

Peer experts assess all applications for accreditation. For accreditations of bachelor and master programmes, the assessment does not include a site visit. For institutional accreditation and accreditation of Ph.D. programmes, a site visit is required.

➤ *Supervision of programmes and institutions*

Peer experts are responsible for the assessment in a revision procedure. In a supervision procedure, NOKUT normally involves peer experts, but this is not considered necessary when supervising purely technical and quantitative requirements. Supervisions, as described in the overview of quality assurance activities in chapter 8, are not regulated in as much detail as revisions are. This means that it is up to NOKUT to decide whether a site visit is necessary for the experts to complete their assessment.

➤ *Revision of programmes and institutions*

Site visits are arranged for all revisions of programmes and institutions. Experts survey the institution and interviews are conducted with relevant groups to verify the information provided by the institution. The duration of the site visits vary based on the size of the programme/institution.

➤ *Pilot on Combined Education and Research Evaluations*

External experts assess the self-evaluation provided by the institution. The model includes three sets of evaluations: an evaluation of research, an evaluation of education, and finally an evaluation of the interplay between research and education. NOKUT does not conduct site visits for this activity. Since it is a pilot, the need for site visits will be evaluated upon completion.

Report

For each activity, the peer experts, supported by NOKUT staff, write a report containing an assessment and recommendations for follow-up.

➤ *Institutional quality assurance audit*

The expert panel meets the day after the interviews to review the information from the documentation and interviews, reach conclusions and prepare a draft report. The draft report is finalised by each project leader from NOKUT and sent back to the experts between one to two weeks after the site visit. The experts provide comments to the draft, and NOKUT makes the final changes to the draft. In the pilot, the chairs of each expert committee meet for a calibration meeting to ensure equal application of the regulations. Each chair then discusses the results of the meeting with the other committee members, which then make any changes to the report that they deem necessary prior to submitting the final report to NOKUT.

➤ *Initial programme and institutional accreditation, supervision and revision of programmes and institutions*

The expert panel produces a report after the site visit with the support of NOKUT's administration, which is linked to each specific criteria. For smaller supervisions, the results may be reported in a letter to the institution, while for larger supervisions, the reports for individual institutions or programmes are supplemented with a meta-report, as mentioned in the overview of NOKUT's external quality assurance activities provided in chapter 8.

➤ *Pilot on Combined Education and Research Evaluations*

Experts produce a report for each institution with the support of NOKUT's administration.

Follow-up

NOKUT has visibly increased its focus on follow-up, especially for initial programme accreditation and the institutional quality assurance audit. Follow-up is custom-designed for each of NOKUT's quality assurance activities.

➤ *Initial programme accreditation*

Institutions were asked to complete a survey where they filled out information on learning outcomes, teaching staff, recruitment of students and students' workload. In the first round, they are also asked to specify how they have followed up on the different advice from the expert panel for improving the programme. After an assessment of the method, NOKUT recently decided to discontinue this follow-up procedure for programme accreditation. NOKUT is currently revising its programme accreditation model in order to make the procedure for accreditation more effective and focus more on follow-up in an integrated model.

Both NOKUT and institutions with self-accreditation authority award accreditations without time limitations. However, the Norwegian quality assurance model ensures a systematic follow-up of all study programme accreditations, regardless of whether they are accredited by NOKUT or by institutions themselves. This is an integrated part of the requirements for internal quality assurance set by the Ministerial Regulations. All institutions are required to systematically evaluate their study programmes with contributions from peer experts. In addition, all institutions need to have a mechanism in place that ensures that all programmes follow all national rules and regulations. This internal quality assurance is in its turn reviewed by NOKUT as part of the institutional quality assurance audit. Follow-up of programme accreditation may also be conducted by means of a supervision or revision.

➤ *Initial institutional accreditation*

Institutional accreditations are followed up by way of the institutional quality assurance audit as part of the Norwegian interlinked model of external quality assurance. Follow-up of institutional accreditation may also be conducted by means of a supervision or revision.

➤ *Institutional quality assurance audit*

The results of the institutional quality assurance audit are followed up in two separate paths. Those institutions who pass the audit successfully will be followed up in the next round of the cyclical audit. For those institutions that are found to have deficiencies in their internal quality assurance, NOKUT organises a quick follow-up. The expert panel visits these again within 3-12 months, depending on the extent of the deficiencies. If an institution fails to correct the deficiencies within this period, it can lose its self-accreditation authority, and must wait at least one year before it can apply to be audited again. In addition, if an expert panel discovers serious issues with the educational quality of studies, this is reported to NOKUT's administration, and a supervision or revision of the study programme(s) in question or the institution as a whole can be initiated.

➤ *Supervision and revision of programmes and institutions*

For revisions and most supervisions (mapping and analysis exercises), if the institution/programme is found fully compliant, the revisions or mapping will be terminated. For supervisions that result in partial or non-compliance, the institution is asked to address the issues and submit new documentation within a certain period, depending on the extent of the deficiency. When an expert panel in a revision concludes that a programme or institution does not comply with regulations, the accreditation is revoked.

➤ *Pilot on Combined Education and Research Evaluations*

The follow-up for the pilot has not yet been defined. This will be decided during the evaluation of the pilot based on the results of the pilot as a whole and the individual institutions.

10.4 ESG Standard 2.4 Peer review experts

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

Guidelines:

At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

In order to ensure the value and consistency of the work of the experts, they

- are carefully selected;
- have appropriate skills and are competent to perform their task;
- are supported by appropriate training and/or briefing.

The agency ensures the independence of the experts by implementing a mechanism of no-conflict of interest.

The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

Selection of experts

NOKUT's Academic Supervisions Regulations section 5-5 specifies the procedures for the appointments of external experts (see the overview in chapter 8.2 and attachment 3 for details).

NOKUT sets together an expert panel that fulfils the set criteria for the specific quality assurance activity. For initial accreditations, supervisions and revisions of programmes and institutions, NOKUT asks the institutions to suggest names of potential relevant experts. This assists in finding experts especially at the programme level, where it can be difficult to find an expert with the correct level of knowledge in what can be a very specific field. However, NOKUT reviews the suggestions first, and does not always use the suggested experts.

The regulations also include a no-conflict-of-interest requirement. NOKUT's policy for no-conflict-of-interest elaborates on the national regulations in the Public Administration Act. For each process, the experts fill out a detailed no-conflict-of-interest waiver and submit it prior to appointment.

The regulations also specify that the institution shall be given the opportunity to comment upon NOKUT's proposed panel before the panel is approved. This serves as an extra mechanism to ensure that there are no conflicts of interest. NOKUT reviews any comments and discusses it with the expert(s) they apply to, and if found compelling, finds another expert. At times, one of the challenges NOKUT faces is both ensuring that the experts have sufficient knowledge within the field of studies, while also ensuring their objectivity. Therefore, in a small country such as Norway, we often engage international experts, experts from research institutes or from the labour market within the relevant

academic field. This has been the case for example in instances where all programmes for a specific field have been subject to supervision.

Requirements for the composition of expert panels

Section 5-6 of NOKUT's Academic Supervisions Regulations specifies the competence requirements for the expert panels, which are also listed in the overview of our activities in chapter 8.2. The composition of the expert panels differ based on the type of quality assurance activity.

For all activities except the initial accreditation of bachelor programmes, there is a requirement that at least one member is affiliated with a relevant foreign higher education institution. For the accreditation, supervision and revision of institutions, the expert panel also has a representative from society.

NOKUT also seeks to ensure as much diversity in each committee as possible, for example in regards to gender, geographical and institutional affiliation, as well as other relevant backgrounds.

➤ Institutional quality assurance audit

The expert panel consists of peer experts with backgrounds from institutional management, quality assurance, academic staff, affiliation to a foreign institution and a student representative on the institutional level.

➤ Initial institutional accreditation and revision

The expert panel consists of peer experts with backgrounds from institutional management, academic staff, affiliation to a foreign institution, a student representative on the institutional level, representatives from the labour market or society. For university accreditation, the expert panel is supplemented by sub-committees consisting of field experts in the doctoral fields of the applicant. The sub-committee advises the main expert committee.

The requirements for the composition of the expert panel for the revision of an institution are the same as for institutional accreditation.

➤ Initial programme accreditation

The members of the expert panel must have relevant experience on a higher academic level than the one being accredited, as well as international experience for master and Ph.D.-applications and a student expert for Ph.D.-applications.

NOKUT has since the autumn of 2017 also included a student expert in the expert panels for applications for accreditation of bachelor and master programmes. The fact that this has not been a requirement before has been a result of the way the Norwegian system has functioned. Since the vast amount of Norwegian HEIs have self-accreditation authority at this level, NOKUT receives a relatively small number of bachelor and master level accreditation applications. The applications also vary significantly in terms of academic discipline and specialisation, making it difficult for NOKUT to use standing committees of peer experts. This means that NOKUT has appointed two experts for each individual application, which has been a very costly and time-consuming process. Because of this, it has been challenging to include students in the accreditation of bachelor and master level programmes. That said, NOKUT recognises the value students can bring to the process, and has therefore initiated the pilot using students peer-experts in all initial programme accreditations. NOKUT has also initiated a full review of its accreditation processes in order to make the process more efficient. The new

processes will involve overarching expert panels that include students for all bachelor and master level accreditations.

➤ *Supervision of programmes and institutions*

NOKUT has recently introduced the same requirements for the composition of expert panels in the supervision of programmes and institutions as those that apply for revision. Prior to this, expert panels were composed as deemed suitable for each supervision, as supervision has not been regulated in the same detailed extent.

Since supervision is a fairly new activity in NOKUT's portfolio, this has led to certain instances where NOKUT has chosen not to include students in the peer expert panels. Here, too, NOKUT recognises that student input is important, and we now include students in all of our current supervision processes.

For supervisions with a purely technical or administrative focus, NOKUT may choose not to include external experts and instead undertake administrative assessments in the initial phases of a supervision process (mapping stage, dialogue stage).

➤ *Revision of programmes*

The members of the expert panel for programme revision must have relevant experience on a higher academic level than the level of the programme under revision, professorship for Ph.D. programmes, international representation, and must include a student expert.

➤ *Pilot on Combined Education and Research Evaluations*

The expert panel is comprised of international experts only, in permanent academic position with experience in teaching and educational leadership.

Training and briefing of experts

The model for training and briefing of the experts for each quality assurance activity depends on the extent of the procedure and whether it includes a site visit. They have in common that NOKUT's caseworkers provide both administrative support and serve as secretaries, as well as provide guidance on criteria and precedence on the application of criteria. Below, NOKUT describes the training and briefing of experts in detail for each of its quality assurance activities.

➤ *Institutional quality assurance audit*

For audits, NOKUT holds an experts training, where the criteria and model are first presented. This is followed by plenary and group discussions on the role of an expert, how NOKUT assists in the process, how to reach an overall conclusion and how an institutional site visit is conducted.

➤ *Initial programme accreditation of bachelor and master programmes*

For the initial accreditation of bachelor and master programmes, NOKUT holds 'writing meetings'. Experts receive a guide to the accreditation process, the application and documentation prior to the meeting and are asked to submit their initial thoughts. They then meet and are first provided with a presentation of the procedures and practicalities of an initial accreditation. The rest of the meeting is spent writing the report. A caseworker is present to provide help and take notes, upon the request of the experts, as well as guide the experts through NOKUT's requirements and offer examples of similar assessments.

➤ *Initial programme accreditation of Ph.D. programmes, as well as initial accreditation, supervision and revision of institutions*

During an initial accreditation of a Ph.D. programme, experts meet for a working seminar several weeks prior to the site visit. NOKUT's caseworkers give a presentation of the requirements and practicalities. They also provide the experts with guidance and information about similar assessments when needed, as the experts discuss their initial thoughts about the application and documentation. Caseworkers support the experts when they require additional information prior to the site visit, as well as support the experts in planning the site visit, defining topics for the interviews and discussing how they will conduct the interviews. During the site visit, NOKUT's caseworkers provide practical assistance, take notes and provide guidance upon request of the experts.

➤ *Pilot on Combined Education and Research Evaluations*

All of the experts were sent a detailed description of the assignment and the assessment criteria prior to the first meeting. During the first day of the first meeting, NOKUT carefully briefed the experts on the assessment criteria and how to use the assessment tool, the data provided by NOKUT and the self-evaluation reports from the institutions. NOKUT is represented with one caseworker in each of the panels that assist the experts if they have further questions about the criteria.

10.5 ESG Standard 2.5 Criteria for outcomes

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.

Guidelines:

External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based.

Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

Pre-defined criteria for outcomes

NOKUT's criteria for decisions regarding institutional quality assurance audit, institutional and programme accreditation, as well as supervision and revision thereof, are prescribed in NOKUT's Academic Supervisions Regulations and the Ministerial Regulations. Revisions and supervision projects are carried out based on the same criteria as accreditation procedures, both at the programme and the institutional level. All regulations are published on www.lovdata.no and on NOKUT's website. NOKUT provides further details and recommendations on request or in a number of guides, available on NOKUT's website.

For the specific criteria per quality assurance activity, NOKUT refers to the Ministerial Regulations in attachment 2 and the Academic Supervisions Regulations in attachment 3, as well as the applicable sections per activity in the overview in chapter 8.2. For the Pilot on Combined Education and Research Evaluations, criteria are not regulated in the Academic Supervisions Regulations.

The criteria contain the following themes for each of the quality assurance activities:

➤ *Institutional quality assurance audit*

The criteria for the audit are rooted in NOKUT's Academic Supervisions Regulations, chapter 4. These criteria require that institutions are responsible for the management of their work with quality assurance and development and that they must systematically gather information from relevant sources to be able to evaluate and develop the quality of all study programmes, as well as uncover and rectify instances of insufficient quality. The audit also controls that the institution has a system in place to ensure that all study programmes fulfil NOKUT's programme accreditation requirements.

➤ *Initial accreditation, supervision and revision of institutions*

The criteria for institutional accreditation are mainly described in the Ministerial Regulations concerning quality assurance and quality development in higher education and tertiary vocational education. Section 3-5 contains a set of criteria that apply for all types of institutional accreditation. These are for example the requirement to have higher education as a main activity, and an appropriate institutional organisation and infrastructure. Sections 3-6, 3-7 and 3-8 contain specific criteria for accreditation as a university college, specialised university and university respectively. These criteria concern research and education, education staff, specifications on amounts and types of accredited study programmes, especially doctoral programmes for specialised universities and universities, and cooperation with other institutions and networks.

Section 3-1 in NOKUT's Academic Supervision Regulations contain a further specification of criteria that apply to all types of institutional accreditation. One key criterion is the requirement to have an approved quality assurance system.

➤ *Initial accreditation, supervision and revision of study programmes*

NOKUT's criteria for initial programme accreditation comprise general requirements for accreditation, such as the institution's organisation (including student and staff representation in its Board), institution-wide regulations for admission, exams, complaints, etc.

The core criteria for initial programme accreditation consist of requirements for the study programme and its staff. These include learning outcomes, the programme's name, relevance, the content and curriculum plan, links to research, infrastructure, internationalisation and student exchange, and if relevant also practice. Requirements for the programme's staff include both its educational and research competence, the amount of staff, a leadership for the programme (quality assurance and enhancement), the staff's research, collaboration in (inter)national networks etc. At least half of the full time equivalents must have their main position with the applying institution, and NOKUT sets requirements for the level of competency (Ph.D., postdoctoral, professor, educational professor, etc.), differentiated per programme level. Certain specific requirements for the accreditation of master and Ph.D. programmes are regulated in the Ministerial Regulations. In addition, both the Ministerial Regulations and NOKUT's Academic Supervision Regulations comprise specific complementary criteria for interinstitutional research programmes in the arts and for joint degrees.

Supervisions and revisions of study programmes are based on the same criteria. In a revision, all criteria are addressed. A supervision of a study programme only addresses a selection of those criteria, and is adapted to the specific area of concern.

➤ *Pilot on Combined Education and Research Evaluations*

The assessment criteria for the evaluation are drawn from NOKUT's policy document "Quality areas for study programs" that is published on NOKUT's website. The evaluation criteria are an

operationalisation of these quality dimensions and were developed by NOKUT in close collaboration with a reference group with members from seven institutions participating in the pilot. The following nine quality dimensions served as indicators to evaluate educational quality: (1) initial competence, (2) programme design, (3) teaching and assessment methods, (4) learning environment in study programmes, (5) educational competence, (6) achieved learning, (7) internationalisation, (8) relevance, (9) educational leadership.

For the education and research interplay evaluation, NOKUT and the Norwegian Research Council commissioned the Nordic Institute for Studies in Innovation, Research and Education (NIFU) to conduct a literature review and develop a set of indicators to evaluate the interplay between education and research in the Norwegian context: (1) organisational conditions, (2) academic staff R&D orientation, (3) research-based curriculum, (4) use of student active learning forms, (5) variation of teaching and learning methods, (6) involvement in staff research and (7) assessment practice. These interplay indicators are used in the interplay evaluation as criteria that NOKUT and the Norwegian Research Council consider enabling or disabling synergies between research and education.

NOKUT arranged four regional meetings to inform and discuss the evaluation process and criteria with the relevant institutions and programs.

Guidance of applicants

In order for the criteria to be not only pre-defined, but also well known before any procedure, NOKUT provides courses, meetings and seminars for applicants.

NOKUT organises applicant courses for institutions that are considering applying for a programme accreditation on bachelor and master level. Institutions planning an application to start a doctoral programme or to become accredited as an institution can ask for individual guidance. In specific cases, when deemed necessary, NOKUT may also hold additional guidance meetings with individual institutions applying for a bachelor or master programme accreditation.

Before the institutional quality assurance audit and during revision of programme or institutional accreditation, NOKUT holds a meeting with the institutions to inform them about the background for the audit or revision and the procedure to follow, in order to avoid misunderstandings and to discuss any questions they may have.

Consistent application of criteria

NOKUT's guides are our most important tool for both institutions and experts, and ensure consistent application of the criteria for our various quality assurance activities. These include common questions, previous interpretations, etc. In addition, NOKUT applies the following mechanisms to ensure equity and competence amongst its peer experts and caseworkers:

- The expert panel reviews the information from the application/documentation and, if applicable, the results from site visit interviews. They reach conclusions and prepare a draft report, sometimes with the support of NOKUT's caseworkers. The draft report is commented upon by the caseworker and sent back to the experts.
- As mentioned in ESG 2.3, NOKUT will also gather the chairs of the expert committees in the pilot for the new institutional quality assurance audit in order to discuss how each of the committees has applied the standards. After the meetings, the chairs return to their committees with the input from the meetings for further discussions. The decision to conduct this meeting was based on previous, successful experiences with calibration meetings in other supervision processes.

- Two caseworkers carry out each of NOKUT's activities. Each of them must know the case in detail and quality-assure the other caseworker's output.
- Caseworkers work in teams per activity, and have regular team meetings to discuss issues of interpretations that may arise when carrying out tasks. When suitable, challenges are discussed in weekly section meetings. Caseworkers also work across teams, to ensure that each knows how other teams work and to ensure good cooperation and coordination across various quality assurance activities.
- Each of NOKUT's reports are quality-assured by either the Head of Accreditation or the Head of Quality Assurance, both before the reports are sent to the institutions for comments, and again before the reports are approved.
- The Section Heads may raise discussions on current challenges with the application of criteria in the weekly management meeting of the Department of Quality Assurance. In very exceptional cases which may set precedence in a discussion on principles, the Board may be involved to take a decision on the interpretation of a requirement.

Ensuring the consistent application of criteria can at times present challenges for any quality assurance agency, especially when facing a sector characterised by a large degree of diversity. For NOKUT, equity and the consistent application of criteria receives continuous attention.

The decisions are made by NOKUT's Board or are delegated to NOKUT's administration. They are made based on reports by external expert panels.

10.6 ESG Standard 2.6 Reporting

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.

Guidelines:

The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover

- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;
- evidence, analysis and findings;
- conclusions;
- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

Publication of reports

NOKUT publishes full reports on both positive and negative decisions on its website. All supporting documents⁵ for any activity are considered public information, and access can be requested through the national electronic public records after registration. By law, NOKUT must respond to the request within three days.

Content of reports

The reports describe the process for the activity and the selection and background of the experts. The reports are structured according to the relevant criteria being assessed and include descriptions of the context, evidence and analyses for the conclusion the experts have reached.

It is important to NOKUT that institutions receive praise for good practices, and each report includes a set of recommendations for follow-up in addition to any required action to ensure compliance with regulations. For thematic supervisions, summary reports analyse and compare practices and results from different programmes and/or institutions.

Factual inaccuracies and improvements

For all quality assurance activities, reports are sent to the institution to point out factual inaccuracies. Following the fact-check with institutions, institutions are given the opportunity to make improvements and provide comments to the conclusions within a given time frame, should the original conclusion be non-compliant. In supervisions and revisions, the responses and experts' assessments of the responses have generally been added at the end of the main report. NOKUT believes that this can be a challenging challenge for readers to compare the assessment of the responses with the original expert assessment, and NOKUT is reconsidering this form of structuring reports. We are now testing a template in which the responses from institutions and expert assessment of the responses are placed beneath each criteria in the original report.

Decision-making by the Board or the administration

For the institutional quality assurance audit, initial programme and institutional accreditations and revisions, reports are sent to the Board or the applicable decision-making level in NOKUT's administration. Reports for supervisions may also be sent to the Board, though this varies from case to case, often depending on the scope of the supervision and a consideration of public interest. Reports resulting from the Pilot on Combined Education and Research Evaluations will not be sent to the Board as they do not lead to a formal decision. However, all reports will be published and accessible to the public.

Clear and accessible language

NOKUT has an expressed goal of writing reports that are clear and accessible not only to those within the sector, but also non-specialist readership. Each year NOKUT invites an external course instructor to hold a "plain language" for employees. The course is voluntary, but very popular and praised. It aims to provide tools and exercises to learn how to write in an accessible and clear manner. However, NOKUT's reports can still contain jargon, or 'internal language', which affects our ability to communicate our message across to the readership, both within the higher education sector and the general public, which may limit our ability to reach our goal of assuring and contributing to the enhancement of quality. Writing in plain language is a constant learning process. The role of the secondary caseworker is important in quality assuring the language and structure of the reports.

⁵ Unless deemed classified due to sensitive information. All documents are automatically registered as public, and any decision to classify information must be because of overwhelming reasons for doing so.

10.7 ESG Standard 2.7 Complaints and appeals

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

Guidelines:

In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.

Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

For each of its quality assurance procedures, institutions are given the opportunity to correct factual inaccuracies in a consultation round before NOKUT makes a decision.

During and after quality assurance procedures, institutions can send complaints to NOKUT. Complaints are not regulated by law, but they are part of a wider practice of collecting feedback, both positive and negative. This applies to both quality assurance activities and other initiatives. For instance, NOKUT collects feedback after guidance courses for programme accreditation, and uses this to develop new methods and practices for guidance courses.

Most complaints are addressed through NOKUT's appeals procedure, which applies to all quality assurance activities. The appeals procedure is regulated by the Public Administration Act and the Ministerial Regulations, and is described on our website. Appeals must be related to a procedural error on NOKUT's part, including the consistent application of criteria. Institutions cannot appeal academic assessments made by the expert panel.

NOKUT has an Appeals Committee that processes appeals to any formal decision made by NOKUT. The Ministry of Education and Research nominates the Appeals Committee, which acts independently. The Committee consists of five external members, each with a substitute, and a judge in the Court of Appeals of Norway serves as the chairperson. The Appeals Committee considers each appeal and may either reject or accept it. In the latter case, NOKUT's decision is reversed and sent back to NOKUT's administration for a re-assessment in accordance with the appeals decision. The decision made by the Appeals Committee cannot be appealed.

In the period 2013-2016, institutions have appealed against 21 decisions, mostly related to programme accreditation. The majority related to negative accreditation decisions on short programmes. Only one of these achieved the Appeals Committee's consent. This was the case for the accreditation of a bachelor programme in 2016.

ATTACHMENTS AND FURTHER INFORMATION

- NOKUT's publicly available mission statement: attachment 4 or <https://www.nokut.no/en/about-nokut/development-strategy-201520202/>
- NOKUT's policy document Quality Areas for Study Programmes: attachment 5
- Development Plan for Culture and Competence: attachment 6
- Internal Quality Steering System: attachment 7
- Quality handbook:
<https://cp.compendia.no/nokut/kvalitetssystem/?key=bf181ab8376859035164f94075e2a3a6>
- Rules and regulations: attachments 1, 2 and 3 (or <https://www.nokut.no/en/about-nokut/>)
- NOKUT's guides (in Norwegian only): <https://www.nokut.no/publikasjoner/veiledninger/>
- NOKUT's quality assurance reports in English (only certain study programme accreditations):
<https://www.nokut.no/en/publications/accreditation-and-quality-assurance/>
- NOKUT's quality assurance reports in Norwegian:
<https://www.nokut.no/publikasjoner/akkreditering-og-tilsyn--hoyere-utdanning/>
- ENQA Panel Report 2013: <https://www.nokut.no/om-nokut/internasjonalt-samarbeid/ENQA-evaluering/> and
https://www.nokut.no/globalassets/nokut/artikkelbibliotek/generell/enqa/review_of_nokut_report_of_the_enqa_panel_may_2013.pdf

PART V: SELF-ASSESSMENT AND FUTURE DEVELOPMENT

11 Recommendations and main findings of previous reviews and NOKUT's resulting follow-up

11.1 Outcomes from previous reviews

NOKUT has been reviewed and found to be in compliance with the ESG both in 2008 and 2013. The review in 2013 was coordinated by ENQA. These external reviews formed the basis for the continuation of NOKUT's membership in ENQA. NOKUT has been registered in the European Quality Assurance Register for Higher Education since May 2014.

In 2008, the expert panel found that NOKUT complied with the ESG Part 3 on all eight standards (3.1 – 3.8), using the expression 'fully compliant' for seven of these. Concerning standard 3.7, 'External quality assurance criteria and processes used by the agency', the conclusion was that NOKUT complied with the standard, with the added comment that *"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"*. In addition, the expert panel provided NOKUT with several recommendations for improvement, which NOKUT addressed thoroughly in its 2013 self-evaluation.

The 2013 expert panel did not address 2008 recommendations individually, but concluded that *"It is evident from both the SER and this report that NOKUT has made a clear progress in refining its operations since its membership review in 2008. This is to a large extent due to the commitment and professionalism of its staff, proved by the serious attitude they demonstrated in preparing for this review in terms of both the self- review process and the site visit."*

The panel concluded that, except for two areas, NOKUT is fully compliant with the standards in the ESG. The two areas where NOKUT was found to be substantially compliant and in need of further improvement was:

- *ENQA Membership Criterion 1 and section 3.1: external quality assurance built on the results of internal quality assurance*
- *ENQA Membership Criterion 6: External quality assurance criteria and processes used.*

The external review panel recommended that NOKUT:

1. *Strengthens further its audits in order to fully address the ESG Part 1 by guiding evaluation panels and institutions regarding the kind of processes and procedures they are expected to devise in order to improve the standards of their awards and the quality of learning opportunity for their students*
2. *Introduces options for follow-up of recommendations in evaluation reports in order to monitor more closely developments in quality assurance systems and study programmes. This is particularly important with the view of the fact that NOKUT accredits on the basis of ex ante evaluation of new programmes and the validity of accreditation is not time-limited*
3. *Considers how to make sure that students' contributions add value to the work of experts' panels and they are well supported by an adequate to their needs training*
4. *Defines the non-conflict of interest it applies in its procedures for nomination and appointment of experts, which would help both its experts and the institutions under review to easily detect and prevent cases of conflict of interest.*

11.2 EQAR's Register Committee

Upon inclusion in the European Register for Quality Assurance in Higher Education (EQAR) in 2014, the following themes were in need of future attention:

- ESG 2.1: Consideration of internal QA [ESG 2005: standard 2.1]

It should receive attention whether all aspects of part 1 of the ESG are explicitly and firmly embedded in NOKUT's criteria and processes.

- ESG 2.3: Implementing processes [ESG 2005: standard 2.6]

Attention should be given to the implementation of follow-up activities for accreditation of new programmes and for institutional audits, as well as to their effectiveness in practice.

- ESG 2.4: Peer-review experts [ESG 2005: standard 3.7]

It should receive attention whether students have been included in expert groups for programme accreditation, provided the process includes an assessment by a group of experts.

11.3 Follow-up of recommendations

In 2015, NOKUT delivered a follow-up report to ENQA, addressing the recommendations of the review panel and the issues flagged by EQAR's Register Committee for future attention. Below, we describe how NOKUT has addressed the recommendations.

1. Addressing ESG Part 1

NOKUT's new model for the institutional quality assurance audit strengthens the significance of the ESG as a prerequisite for well-functioning quality assurance. NOKUT requires all institutions to follow all standards in ESG Part 1. NOKUT has implemented this through the incorporation of the criteria for programme accreditation in the criteria for the audit. For detailed information, see chapter 8 and 10.1 on ESG 2.1.

2. Follow-up of recommendations in audits and programme accreditation

In the second round of evaluations of institutional quality assurance systems, the forerunner of the institutional quality assurance audits, NOKUT explicitly asked institutions to address in their cover letter how they followed up recommendations from the previous evaluation in the first round. Expert panels also addressed the follow-up of recommendations in the review reports following ENQA's previous review of NOKUT. In the new model for the quality assurance audit, NOKUT does not explicitly address the recommendations institutions received in the second round of the audit. The reason for this is the implementation of the revised University and University College Act and NOKUT's Academic Supervisions Regulations. The revised legal framework requires NOKUT to audit the institutions' systematic quality work, as opposed to just the institutions' internal quality assurance systems.

NOKUT has initiated follow-up of programme accreditation since ENQA's previous review. As of 2012, all programme accreditation decisions included a notice on follow-up after three years. Accordingly, the first round of follow-up was carried out in 2015 and included 34 study programmes. The follow-up centred on four critical themes: student recruitment, learning outcomes, teaching staff and workload. In addition, the institutions involved were required to

address how they had followed up NOKUT's recommendations. NOKUT presented the results in a public report in 2016, which also included an evaluation of our methodology. Currently, NOKUT is re-thinking its programme accreditation procedures in order to limit these procedures and make them more efficient, as well as to increase the focus on follow-up. For more information on how NOKUT ensures systematic follow-up of recommendations, see chapter 10.3 on ESG 2.3.

3. Students' involvement in programme accreditation and training of student experts

As described under ESG 2.4 and in chapter 8, NOKUT uses student experts in a majority of our external quality assurance activities. Until this year, NOKUT did not use student experts in our panels for accreditation of bachelor and master level programmes; this is discussed in chapter 10.4 on ESG 2.4. Here we also describe current efforts to develop new accreditation methods that will include student experts, as well as our current pilot project where we include student experts in accreditation panels.

Student experts now take part in the regular training of all experts, which covers presentations of procedure, assessment criteria and interpretation, and discussions of how work tasks are divided between the experts and NOKUT's caseworkers.

4. Non-conflict of interest procedures

In 2014-2015, NOKUT developed and implemented an expanded non-conflict of interest regulation that applies to both external experts and NOKUT's staff. The regulation is a concretisation of Norway's non-conflict of interest rules for public administration as regulated by the Public Administration Act. NOKUT's regulation sets more specific rules adapted for the higher education sector and NOKUT's procedures. Each external expert must fill out a non-conflict of interest declaration comprising a list of detailed questions in order to ensure that NOKUT only makes use of impartial and unbiased experts.

ATTACHMENTS AND FURTHER INFORMATION

- ENQA Panel Report 2013:
https://www.nokut.no/globalassets/nokut/artikkelbibliotek/generell/enqa/review_of_nokut_report_of_the_enqa_panel_may_2013.pdf

12 SWOT-analysis

The SWOT-analysis concerns exclusively NOKUT's ESG-related activities, and therefore does not analyse NOKUT's full activity portfolio.

Strengths	Weaknesses
<ul style="list-style-type: none"> - Trust-based relationship with the higher education sector: quality assurance in Norway is shared between NOKUT and the institutions. - Close and cooperative relationship with key stakeholders such as students, trade unions and employee organisations. - Continuous work to improve and renew methods and adapting to the changes in the sector, ensuring that NOKUT is fit for purpose. - Written handbooks and guidelines ensure transparency in processes, create a common understanding of quality in education and ensure equal treatment of institutions. - NOKUT's knowledge base enable informed decisions about where to prioritise resources for supervisory activities. - Commitment to impartial and independent peer-review ensure expert assessments and strengthens NOKUT's legitimacy. 	<ul style="list-style-type: none"> - Some higher education institutions perceive NOKUT's audits and supervisory activities as inspections, solely focused on control. This perception challenges NOKUT's quality enhancement activities. - NOKUT's mission and activities are not sufficiently known by the general public. - Complex programme accreditations impede follow-up. - Challenging to ensure sufficient training of peer-experts in all of NOKUT's quality assurance activities and ensure continuity in NOKUT's pool of peer experts.
Opportunities	Threats
<ul style="list-style-type: none"> - NOKUT's networks, knowledge base and central position in the higher education landscape enables NOKUT to spread good practice from both near and abroad. - Completion of recent regulatory changes allows NOKUT to continue its commitment to systematically evaluate all quality assurance activities, thereby further strengthening our knowledge base and improving methods and procedures. - Fewer institutions resulting from multiple mergers may lead to less accreditation and more room for supervision and quality enhancement activities. 	<ul style="list-style-type: none"> - NOKUT's operational independence may be challenged by an increasing amount of activities imposed/commissioned by the Ministry of Education and Research. - A rush of accreditations resulting from recent regulatory changes may challenge NOKUT's operational ability to oversee that all study programmes and institutions comply with set regulations. - NOKUT's increasing knowledge base requires continuous investments in specialised data management skills, data management software and digital security solutions in order to be maintained and utilised in an efficient and secure manner.

13 Current challenges and areas for future development

As of 2017, NOKUT is at the end of a long transitional phase in which multiple interlinked changes in the higher education landscape have been implemented. Structural and regulatory changes initiated by the government have necessitated multiple responses from NOKUT. Three issue areas can be highlighted in this regard:

First, the above-mentioned regulatory changes have amplified the need to adjust methods and procedures, ensuring that NOKUT remains fit for purpose. With the introduction of NOKUT's new Academic Supervision Regulations in 2017, the Department of Quality Assurance is currently developing and improving procedures and methods for all of our quality assurance activities.

Second, due to the recent wave of mergers in the sector, institutions with self-accreditation authority have expanded and fewer institutions must apply to NOKUT to set up new study programmes or substantially change existing ones. In addition, new legal requirements will require private university colleges without self-accreditation authority to apply for institutional accreditation. In the short term, this might increase the number of complex institutional accreditations, but over time it will likely reduce NOKUT's work related to programme accreditation. As a result, NOKUT expects to be able to free resources from programme accreditation and invest them in supervisory activities. This corresponds to the clear ambition expressed by NOKUT's Board to prioritise more resources for efficient and targeted supervisory activities.

Third, a recent challenge is the Ministry of Education and Research's decision to reorganise the Ministry and the agencies the Ministry manages. To achieve its goals the Ministry is in the process of changing the Universities and University Colleges Act. In the proposed changes, NOKUT will remain an independent agency governed by a Board, but the changes will allow the Ministry to move tasks and operations from the Ministry to NOKUT. The changes will also give the Ministry the right to impose new tasks (outside the scope of the ESG) on NOKUT. These changes will not impede on NOKUT's formal independence when it comes to ESG related activities, but they demand that the Ministry and NOKUT's management ensures that all of NOKUT's ESG related activities remain well funded.

Deriving from these issue areas, NOKUT is developing the following broad projects that will set the agenda for NOKUT's activities in the years to come:

1. Thematic long-term plan

At the request of the Board, NOKUT is currently developing a thematic long-term plan. The plan aims to identify quality areas that NOKUT, through its knowledge base, knows are particular challenges for the sector. Furthermore, for each of the quality areas, the plan will describe how NOKUT will use its portfolio of quality assurance and supporting activities to address these issues. The thematic long-term plan will help NOKUT prioritise our quality assurance work. The plan will also make the sector aware of which issues NOKUT aims to prioritise in the future.

2. Methodological development

NOKUT is developing a new model for programme accreditation. The goal is to create a more efficient model that allows NOKUT to ensure that new programmes are of sufficient quality, while at the same time shift NOKUT's focus to follow-up of newly established programmes.

As described in chapter 10.2, NOKUT's supervision activities are less regulated than other quality assurance activities. To ensure the streamlining, efficiency and transparency of supervision, NOKUT is developing new methods and procedures for these activities.

With new regulations, procedures and methods, NOKUT must also ensure that we develop a new training system for our experts. It is critical that NOKUT provide the experts with the necessary knowledge and guidance on NOKUT's new regulations, methods and procedures so that our reviews are fair and consistent irrespective of who the experts are.

3. Communication with the higher education sector and the general public

As described through the report NOKUT use a broad array of activities and measures to secure, enhance and inform about the quality of Norwegian higher education. The combination of quality control and enhancement is challenging to communicate clearly to the higher education sector and is something NOKUT continually tries to address. Another issue is that even though NOKUT is well regarded by its stakeholders and the general public, NOKUT can become even better at improving the ways through which we inform our stakeholder and general public about the quality of Norwegian higher education.

Attachments

1. Universities and University Colleges Act of 1 April 2005
2. Regulation concerning quality assurance and quality development in higher education and tertiary vocational education of 1 February 2010 (Ministerial Regulations)
3. NOKUT's Regulations concerning supervision of the educational quality in higher education of 9 February 2017 (Academic Supervisions Regulations)
4. Development Strategy for 2015-2020
5. NOKUT's policy document Quality Areas for Study Programmes
6. Development Plan for Culture and Competence
7. Internal Quality Steering System

