



**REPORT
OF THE EXPERT PANEL
ON THE REACCREDITATION
OF THE UNIVERSITY POSTGRADUATE (DOCTORAL)
PROGRAMME
LEGAL SCIENCES
FACULTY OF LAW, UNIVERSITY OF ZAGREB**

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INTRODUCTION

The Expert Panel appointed by the Agency for Science and Higher Education (ASHE) created this Report on the Re-accreditation of the University Postgraduate (Doctoral) Study Programme *Legal Sciences* on the basis of the Self-Evaluation Report (SER) of the Programme, other documentation submitted and a visit to the Faculty of Law, University of Zagreb.

The Agency for Science and Higher Education (ASHE), a public body listed in EQAR (European Quality Assurance Register for Higher Education) and a full member of ENQA (European Association for Quality Assurance in Higher Education), re-accredits higher education institutions (hereinafter: HEIs) and their study programmes in line with the Act on Quality Assurance in Science and Higher Education (Official Gazette 45/09) and the Ordinance on the Content of a Licence and Conditions for Issuing a Licence for Performing Higher Education Activity, Carrying out a Study Programme and Re-Accreditation of Higher Education Institutions (OG 24/10). In this procedure parts of activities of higher education institutions and university postgraduate study programmes are re-accredited.

Expert Panel is appointed by the Agency's Accreditation Council, an independent expert body, to carry out independent evaluation of post-graduate university study programmes.

The Report contains the following elements:

- Short description of the study programme,
- The recommendation of the Expert Panel to the Agency's Accreditation Council,
- Recommendations for institutional improvement and measures to be implemented in the following period (and checked within a follow-up procedure),
- A brief analysis of the institutional advantages and disadvantages,
- A list of good practices found at the institution,
- Conclusions on compliance with the prescribed conditions of delivery of a study programme,
- Conclusions on compliance with the criteria for quality assessment.

Members of the Expert Panel:

- Prof. Tamás Hoffmann, Hungarian Academy of Sciences, Hungary, President of the Expert Panel;
- Dr. Gerhard van der Schyff, Tilburg Law School, Department for Public Law, Jurisprudence and Legal History, Tilburg University, The Netherlands;
- Dr. Dagmar Simon, The WZB Berlin Social Science Center, Germany;
- Prof. Dibyesh Anand, University of Westminster, United Kingdom;
- Dr. Igor Štikis, University of Edinburgh, United Kingdom;
- Prof. Mare Leino, Tallinn University, Estonia;
- Max Lügert, doctoral candidate, Rheinische Friedrich-Wilhelms-Universität Bonn, Germany;
- Marko Radenović, doctoral candidate, Princeton University/McKinsey & Company, Croatia;

- Katja Simončič, doctoral candidate, Inštitut za kriminologijo, Pravna fakulteta, Univerza v Ljubljani, Slovenia.

The higher education institution was visited by the following Expert Panel members:

- Prof. Tamás Hoffmann, Hungarian Academy of Sciences, Hungary;
- Dr. Gerhard van der Schyff, Tilburg Law School, Department for Public Law, Jurisprudence and Legal History, Tilburg University, The Netherlands;
- Marko Radenović, doctoral candidate, Princeton University/McKinsey & Company, Croatia;
- Katja Simončič, doctoral candidate, Inštitut za kriminologijo, Pravna fakulteta, Univerza v Ljubljani, Slovenia.

In the analysis of the documentation, site visit and writing of the report the Panel was supported by:

- Maja Briški, coordinator, ASHE,
- Goran Briški, interpreter at the site visit and translator of the Report, ASHE.

During the visit to the Institution the Expert Panel held meetings with the representatives of the following groups:

- Management,
- Study programme coordinators,
- Doctoral candidates,
- Teachers and supervisors,
- External stakeholders,
- Alumni.

The Expert Panel also had a tour of the library, IT rooms, student register desk and the classrooms.

SHORT DESCRIPTION OF THE STUDY PROGRAMME

Name of the study programme contained in the licence: Postgraduate university (doctoral) programme *Legal Sciences*

Institution delivering the programme: University of Zagreb, Faculty of Law

Institution providing the programme: University of Zagreb, Faculty of Law

Place of delivery: Zagreb

Scientific area and field: Social Sciences, Law

Number of doctoral candidates: 306

Number of funded doctoral candidates: 17

Number of self-funded doctoral candidates and those funded by employer: 289

Number of inactive doctoral candidates (those that did not enrol to the next year of study, but still have the right to study): 85

Number of teachers: 112

Number of supervisors: 27

Number of doctoral candidates whose supervisor has been appointed officially (on University Senate): 32

Learning outcomes of the study programme:

LO 1: Independent design and conduct of research in the field of legal sciences;

LO 2: Performing highly specialised tasks in the legal profession in the private and public sectors;

LO 3: Building academic careers in scientific-educational or scientific institutions;

LO 4: Continuation of training on the post-doctoral level;

LO 5: Preparation of in-depth critical analyses, evaluation and synthesis of contents from the area of legal sciences;

LO 6: Application of techniques and methodologies and adaptation of the research process in the area of legal sciences;

LO 7: Communication and evaluation of the achieved results of research in the field of legal sciences;

LO 8: Promotion of excellence in the academic and professional context in the field of legal sciences within society based on knowledge;

LO 9: Further application of acquired managerial and generic skills.

RECOMMENDATION BY THE EXPERT PANEL TO THE ASHE'S ACCREDITATION COUNCIL

Upon the completion of the re-accreditation procedure and the examination of the materials submitted (SER, etc.), the visit to the higher education institution and interviews with HEI members in accordance with the visit protocol, the Expert Panel renders its opinion in which it recommends to the Accreditation Council of the Agency the following:

issue a letter of expectation for the period up to three (3) years in which period the higher education institution should make the necessary improvements.

RECOMMENDATIONS FOR THE IMPROVEMENT OF THE STUDY PROGRAMME

1. The Faculty of Law, University of Zagreb (FLZ) is advised to rebalance the relationship between teaching and research in its PhD programme in favour of more research and less teaching. In this regard, the recommendation is to implement measure 2.5 of the Croatian Strategy for Education, Science and Technology (adopted in 2014), which lists the achievement of a research component of 80% as one of its objectives.
2. In order to establish a strong research-based PhD programme, it is recommended that each student is assigned a dedicated supervisor at the beginning of their study.
3. In order to establish a strong research-based PhD programme, it is recommended that each student is enrolled after the approval of their research proposal.
4. In order to maximise the transferable skills that students acquire, it is recommended that such skills are incorporated in a more explicit manner in the PhD programme.
5. We recommend the implementation of software for detecting plagiarism, raising the awareness of ethics and integrity in research, and storing PhD theses in publically available Dabar database.

ADVANTAGES OF THE STUDY PROGRAMME

1. The Salzburg II Recommendations of 2010 highlight the need for institutions to develop critical mass and diversity of research in order to conduct quality doctoral education. The Faculty provides evidence of critical mass and diversity of research.
2. Students have indicated that their supervisors are easily approachable.
3. Students have indicated that some of the teaching is flexible to their study needs.
4. Employers indicate that they are satisfied with the generic and academic skills that students acquire.

DISADVANTAGES OF THE STUDY PROGRAMME

1. The various teaching modules comprise too many courses, and take at least 1.5 years of the programme.
2. Considerable focus is placed on substantive courses and not enough on research training.

3. Students are generally only assigned a dedicated supervisor in the fifth semester; this is also the stage at which they have a clear research proposal.

EXAMPLES OF GOOD PRACTICE

1. We have observed a good practice established this year by the EU Law module within the Research Methodology course, of students presenting their research to their peers and having an opportunity for feedback and discussion. We believe that such practises should be taken by all departments.

COMPLIANCE WITH THE PRESCRIBED CONDITIONS FOR THE DELIVERY OF A STUDY PROGRAMME

Minimal legal conditions:	YES/NO notes
1. Higher education institution (HEI) is listed in the Register of Scientific Organisations in the scientific area of the programme, and has a positive reaccreditation decision on performing higher education activities and scientific activity.	YES.
2. HEI delivers programmes in the two cycles leading to the doctoral programme, i.e., first two cycles in the same area and field/fields (for interdisciplinary programmes), and employs a sufficient number of teachers as defined by Article 6 of the Ordinance on the Content of a Licence and Conditions for Issuing a Licence for Performing Higher Education Activity, Carrying out a Study Programme and Re-Accreditation of Higher Education Institutions (OG 24/10).	YES.
3. HEI employs a sufficient number of researchers, as defined by Article 7 of the Ordinance on Conditions for Issuing Licence for Scientific Activity, Conditions for Re-Accreditation of Scientific Organisations and Content of Licence (OG 83/2010).	YES.
4. At least 50% of teaching as expressed in norm-hours is delivered by teachers employed at the HEI (full-time, elected into scientific-teaching titles).	YES.
5. Student: teacher ratio at the HEI is below 30:1.	YES. ¹
6. HEI ensures that doctoral theses are public.	NO.
7. HEI launches the procedure of revoking the academic title if it is determined that it has been attained contrary to the conditions stipulated for its attainment, by severe violation of the studying rules or based on a doctoral thesis (dissertation) that has proved to be a plagiarism or a forgery according to provisions of the statute or other enactments.	YES.
Additional/ recommended conditions of the ASHE Accreditation Council for passing a positive opinion	YES/NO (notes)
1. HEI (or HEIs in joint programmes) has at least five teachers appointed to scientific-teaching titles in the field, or fields relevant for the programme involved in its delivery.	YES.
2. In the most recent reaccreditation, HEI had the standard Scientific and Professional Activity marked as at least "partly implemented" (3).	YES.
3. The doctoral programme is aligned with the HEI's research strategy.	YES.
4. The candidate : supervisor ratio at the HEI is not above 3:1.	YES.
5. All supervisors meet the following conditions: a) PhD, elected into a scientific title, holds a scientific or a scientific-teaching position and/or has at least two years of postdoctoral research	a) YES.

¹ Revised following the feedback from HEI, in accordance with the analytics from MOZVAG (25.10.2017).

<p>experience;</p> <p>b) active researcher in the scientific area of the programme, as evidenced by publications, participation in scientific conferences and/or projects in the past five years (table 2, Supervisors and candidates);</p> <p>c) confirms feasibility of the draft research plan upon admission of the candidate (or submission of the proposal);</p> <p>d) ensures the conditions (and funding) necessary to implement the candidate's research (in line with the draft research plan) as a research project leader, co-leader, participant, collaborator or in other ways;</p> <p>e) trained for the role before assuming it (through workshops, co-supervisions etc.);</p> <p>f) received a positive opinion of the HEI on previous supervisory work.</p>	<p>b) NO.</p> <p>c) YES.</p> <p>d) NO.</p> <p>e) NO.</p> <p>f) YES.</p>
<p>Comments:</p> <p>b.) Not all supervisors evidence their research activity in the past five years.</p> <p>c.) Yes, but generally only after the prescribed courses have been passed, and therefore generally in the fifth semester. See our recommendation on only enrolling students based on accepted research proposals.</p> <p>d.) Based on our discussions with students, they are afforded opportunities, but implementation is not always ensured.</p> <p>e.) The SER states that such training is still to be implemented.</p>	
<p>6. All teachers meet the following conditions:</p> <p>a) holds a scientific or a scientific-teaching position;</p> <p>b) active researcher, recognized in the field relevant for the course (table 1, Teachers).</p>	<p>a) NO.</p> <p>b) NO.</p>
<p>Comments:</p> <p>a.) According to the table in SER, not all teachers hold a scientific or scientific-teaching position.</p> <p>b.) According to the table in SER, not all teachers meet this requirement.</p>	
<p>7. The supervisor normally does not participate in the assessment committees.</p>	<p>NO.</p>
<p>8. The programme ensures that all candidates spend at least three years doing independent research (while studying, individually, within or outside courses), which includes writing the thesis, publishing, participating in international conferences, field work, attending courses relevant for research etc.</p>	<p>NO.</p>
<p>Comments:</p> <p>The PhD programme is envisaged as a three year programme, but teaching carries on for at least 1.5 years. Students indicate that some courses are very similar to non-PhD courses that they passed in lower degrees. The majority of courses are not focused on research training, but on gaining substantive knowledge.</p>	
<p>9. For joint programmes and doctoral schools (at the university level): cooperation between HEIs is based on adequate contracts; joint programmes are delivered in cooperation with accredited HEIs; the HEI delivers the programme within a doctoral school in line with the regulations and ensures good coordination aimed at supporting the candidates; at least 80% of courses are delivered by teachers employed at</p>	<p>Not applicable.</p>

HEIs within the consortium.	
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QUALITY ASSESSMENT

	Quality assessment (“high level of quality” or “improvements are necessary”) and the explanation of the Expert Panel
1. RESOURCES: TEACHERS, SUPERVISORS, RESEARCH CAPACITIES AND INFRASTRUCTURE	
1.1. HEI is distinguished by its scientific/ artistic achievements in the discipline in which the doctoral study programme is delivered.	<p>Improvements are necessary.</p> <p>The number of high quality publications is overall quite low. According to the Self-Evaluation Report (SER), 135 teachers have published 162 scientific papers in publications categorized as A1, and most of these publications are in in-house journals. More emphasis should be placed on publishing in international journals, including incentivizing authors whose papers are published in international top category journals.</p>
1.2. The number and workload of teachers involved in the study programme ensure quality doctoral education.	<p>Improvements are necessary.</p> <p>The overall workload of teachers involved in the study programme is generally very high. According to the table provided in SER, more than 20 teachers have a workload exceeding 400 norm-hours, out of which 8 teachers have a workload surpassing 500 norm-hours. One particular teacher has 604 norm-hours.</p> <p>Moreover, some supervisors are involved with significantly more than 3 doctoral students. Contrary to statements made in the SER, supervisors might have up to 7 doctoral students.</p>
1.3. The teachers are highly qualified researchers who actively engage with the topics they teach, providing a quality doctoral programme.	<p>Improvements are necessary.</p> <p>The majority of teachers are indeed active researchers in their respective fields. However, according to the table in the SER, not all have active research profiles. Moreover, emphasis should be placed on international publications and conference lectures.</p>
1.4. The number of supervisors and their qualifications provide for quality in producing the doctoral thesis.	<p>Improvements are necessary.</p> <p>The PhD supervisors are all experts in their respective fields and the doctoral students are satisfied with the attention and guidance they receive from them. The</p>

	<p>supervisors are generally approachable, though some students mentioned that the consultations might be sometimes brief and spread over several months. However, some supervisors are involved with more than 3 students and have a workload substantially exceeding 300 norm-hours. More attention should be given to avoid assigning too many students to one supervisor, even if it is just in the “potential mentor” role.</p>
<p>1.5. The HEI has developed methods of assessing the qualifications and competencies of teachers and supervisors.</p>	<p>High level of quality.</p> <p>The new regulation for doctoral programme to be implemented in the future by the FZL provides for adequate assessment of the qualifications and competences of teachers and supervisors.</p>
<p>1.6. The HEI has access to high-quality resources for research, as required by the programme discipline.</p>	<p>Improvements are necessary.</p> <p>Students have access to the latest national and international literature. Electronic access to international legal databases is particularly impressive and the library staff is well-trained to provide information to students on their respective research questions.</p> <p>However, the library has very little space and the opening hours are limited, which means that part-time students, who work day jobs and can only access the library in late afternoons and weekends are unable to use the facilities. This situation should definitely be remedied.</p>
<p>2. INTERNAL QUALITY ASSURANCE OF THE PROGRAMME</p>	
<p>2.1. The HEI has established and accepted effective procedures for proposing, approving and delivering doctoral education. The procedures include identification of scientific/ artistic, cultural, social and economic needs.</p>	<p>Improvements are necessary.</p> <p>Based on what we have observed, we are concerned whether the procedures, stated by this criterion, and currently in place are effective for delivering high-quality doctoral education.</p> <p>In particular, we found that the programme is too focused on <i>taught</i> courses, rather than <i>independent</i> research (see Section 4.1).</p> <p>Relatedly, while the programme does follow the research strategy (see Section 2.2), there is not enough focus on preparing the students for conducting actual <i>scientific</i> research.</p>

Within the whole programme, there are three courses classified as “methodological”:

- 1.) Comparative Law,
- 2.) Legal Sources and Databases Research
- 3.) Scientific Project Application

Based on descriptions of these courses, submitted to us by the HEI, we are of opinion that:

1.) The course in Comparative Law should not be considered a “methodological”, but primarily as a substantive course. The fact that it is counted as such is doubly problematic, as students who do select it, only have to take one actual “methodological” course during their doctoral studies.

2.) The course in Legal Sources and Databases Research is necessary for doctoral research and should not be elective. However, its present scope might not warrant a status of a regular course, but rather of a mandatory-yet-supplementary course, possibly with a simple pass/fail grading system.

3.) The course in Scientific Project Application is the closest to a typical “methodological” course. It covers a range of topics from the concept of science, to unacceptable practices (including plagiarism), methods in social sciences, and ethics of science. While the scope of coverage is impressive, it is also problematic. We are simply not convinced that 15 hours are enough for students to achieve deeper understanding of these topics. Our concern regarding insufficient methodological preparation was further deepened by very low quality of methodological sections (and nearly-uniform absence of state-of-the-field reviews) of the doctoral theses presented to us by the HEI.

We would urge the programme to offer one elective course in doctrinal legal analysis (normative, descriptive etc.) and qualitative methods (case studies, ethnographical or historical method, grounded theory, linguistic analysis, storytelling etc.), as well as one elective course in more quantitative methods of empirical legal research (statistics, game theory, etc.).

Furthermore, we believe that the students would benefit

	<p>from a more structured coverage of various schools of legal thought (legal formalism, positivism, realism, interpretivism, rights-based and natural law theories etc.), their philosophical underpinnings, and their practical implications. Some of these perspectives are addressed in various substantive courses, but those treatments do not seem sufficient to provide students with a coherent overall understanding of different approaches to legal thinking.</p> <p>We believe this would also help students better situate their own work within the legal discipline itself and current state-of-the-field of legal research.</p>
<p>2.2. The programme is aligned with the HEI research mission and vision, i.e. research strategy.</p>	<p>Improvements are necessary.</p> <p>Last year, the HEI adopted a research strategy for 2016-20. The programme, in terms of courses offered and topics covered, is mostly aligned with that research strategy. The programme topics also reflect the intent, stated in the Strategy, to provide “special attention” to interdisciplinary research.</p> <p>However, it is not fully evident that the Strategy itself was a product of a focused, top-down approach to developing a research agenda for the HEI based on the identified “scientific/ artistic, cultural, social and economic needs”. Instead, it seems to have been primarily built bottom-up, reflecting research interests and expertise of the faculty.</p> <p>The Strategy consists of 46 topics, organized in four overarching themes. Unfortunately, the first (and by far the largest) theme - “New Croatian Legal system” - is insufficiently defined and lacks internal conceptual cohesion. Comprising 33 topics (~70% of total), it ranges from those that do explore recent developments in Croatian law, especially how it interacts with the wider EU legal, political, and social framework, to those that have a more tenuous connection to the theme, including “legal linguistics”, “liability in international law”, “general system of commercial law”, “legal, economic and social aspects of competitiveness”, “modern challenges of transport law”, etc. The other three themes are much more focused, comprising 3-6 meaningfully-connected topics each.</p> <p>We would advise the HEI to rethink the Strategy - with precise and documented identification of areas where further legal research is most needed, and corresponding top-down, structured research agenda - in order to assure maximum usefulness and impact of legal scholarship</p>

	generated by the programme.
<p>2.3. The HEI systematically monitors the success of the programmes through periodic reviews, and implements improvements.</p>	<p>Improvements are necessary.</p> <p>It is not clear that the size of the programmes (and sub-programmes i.e. modules) is reviewed based on the academic needs of Croatian society, or even annual supply of doctoral candidates of sufficient quality. Examination of the admission quotas (~50 per enrolment cycle, 306 since 2006), acceptance rates (~70%, with most rejections due to minimum criteria not being met), and completion rates (just 96 students since 2006, i.e. less than 1/3), suggests that the HEI enrolls too many students into sub-programmes, that the admission process is not overly selective, and that too few of the enrolled students go on to complete their doctoral studies at all, let alone in the intended three years. (We recognize that there are other factors at play here, notably the fact that vast majority of students are also employed full-time.)</p>
<p>2.4. HEI continuously monitors supervisors' performance and has mechanisms for evaluating supervisors, and, if necessary, changing them and mediating between the supervisors and the candidates.</p>	<p>Improvements are necessary.</p> <p>Supervisors are being assessed by students on an annual basis, but it is not clear if these are actually utilized to improve supervisors' performance. The expectations regarding supervisor duties are listed in the by-laws, but our understanding is that those are not consistently (if at all) communicated to the students themselves, making it harder for the students to assess supervisors' performance without a benchmark.</p> <p>Similarly, as there is no policy on how often students are required to meet their supervisors, supervisors cannot be reviewed based on that particular criterion.</p> <p>Furthermore, based on the three evaluation samples we received, we observed that evaluation forms are insufficiently defined, resulting in unstructured evaluations with different levels of detail and focus. This could possibly be because each module uses their own form, making structured evaluations not easily comparable across different modules.</p> <p>We have also noticed that some evaluations included a very detailed overview, prepared by the student, of supervisor's performance with respect to "Scientific activity of the supervisor", their involvement with</p>

	<p>“internationally recognised scientific institutions in the country and abroad” or their “Training in competences crucial for mentorship”. While we believe that these are very important elements when assessing supervisors’ performance, we also believe that those should not be assessed by the students, but rather by supervisors’ peers and heads of module/programme, as well as external evaluators.</p> <p>On the positive side, it should be noted that there is a simple and fairly straightforward procedure for students to change supervisors, which in part mitigates some of our concerns. However, while existence of such procedure might protect/benefit particular students, it does not help improve the quality of supervisors’ work. We have concerns that potentially valid criticisms of supervisors’ work, attitude, etc. could be left undocumented and unaddressed, as disaffected students simply move on and transfer to another supervisor. (Our concerns were reinforced by the seeming inability of the module leaders to recall a single example of a negative review of the supervisor.)</p>
<p>2.5. HEI assures academic integrity and freedom.</p>	<p>Improvements are necessary.</p> <p>There seems to be no policy document outlining ethical aspects of research and writing, most notably defining what counts as plagiarism and instructing students on how to avoid it. Our view is that relying on the fact that plagiarism is illegal by law and, subsequently, on the assumption that students are familiar with that fact, is simply not enough. Although students are required to sign a pledge not to engage in plagiarism, without clearly-defined boundaries of what is allowed and what is not, the effects of such pledge can be limited at best.</p> <p>We were also told that the students are obliged to publish two papers in the peer-reviewed journals before graduating, and that those journals do have guidelines on plagiarism, but our view is that the HEI should recognize the importance of providing clear institutional rules on plagiarism, as:</p> <ol style="list-style-type: none"> 1) these rules should be inculcated in doctoral students from the very start, and cover all the research papers they produce as part of the programme; 2) it is possible that such rules differ among journals,

creating potential confusion and disputes over what constitutes plagiarism.

Finally, plagiarism is covered as a part of the methodological course "Scientific Project Application", but it is unclear if the students are taught just the concept or given guidelines. The course is also an elective one, meaning that students can complete the doctoral programme without having covered plagiarism in classroom.

The HEI does not currently use any software used to check for plagiarism – our understanding is that there are discussions on the level of the University and also with SRCE (Zagreb's University Computing Centre), but the implementation process and timeline is still largely undefined.

In the rare instances where plagiarism was detected, the penalties for the students were insufficient to serve as a meaningful deterrent – one student had their thesis rejected for plagiarism by the thesis committee, but was allowed to complete the studies after changing the thesis topic and the thesis committee.

Currently, doctoral theses are not publicly available. The HEI plans to have "all conditions necessary for the beginning of work on the development and establishment of the repository of thesis, including selection and preparation of items for digitisation, definition and preparation of metadata, digital recording" by the end of 2017. Furthermore the "[e]xpected deadline for finishing this task, including creation of records, creation of digital content/digital collection, review and storing of the digitised content, is envisaged for the academic year 2018/2019." (*Report on the status of repository of thesis*) Our recommendation would be to temporarily invest additional resources and personnel to complete task sooner if possible.

Furthermore, while the plan is to make abstracts available to the public, the full text collection will only be searchable and accessible to users within specific "institutional domain name". We recommend that the HEI specifies to which institutional domain names and/or by which criteria would this access be granted.

	<p>We further recommend that this access is granted to a wide set of domestic and foreign institutions, and that the procedure for obtaining access is simple, straightforward, and developed with the goal of wider, rather than narrower, public access.</p>
<p>2.6. The process of developing and defending the thesis proposal is transparent and objective, and includes a public presentation.</p>	<p>High level of quality.</p> <p>The process of developing and defending the thesis proposal is transparent and objective. It does include a public presentation.</p> <p>The only concern is that the thesis supervisors are not officially assigned from the start (even if provisionally). See more under Sections 3.1 and 4.1.</p>
<p>2.7. Thesis assessment results from a scientifically sound assessment of an independent committee.</p>	<p>Improvements are necessary.</p> <p>Currently, there is no specified protocol for the thesis defence - it is typically conducted on an ad-hoc basis, usually driven by personal preferences of the thesis committee members. Our recommendation is that a clear protocol for thesis defence should be established to assure high and consistent quality of the process itself, as well as of programme's academic output.</p> <p>Furthermore, we recommend investing additional effort to include international faculty into thesis defence committees, even if their participation is via teleconference. "International" should also be understood primarily as those outside of Croatia's immediate region (i.e. neighbouring countries).</p> <p>Currently, the thesis committees comprise 3-5 members, one of whom is the thesis supervisor, and there is no discussant role. Our recommendations are as follows:</p> <ol style="list-style-type: none"> 1.) Thesis supervisor should be present at the defence, but not part of the thesis defence committee. 2.) If the thesis supervisor is part of the committee, then the committee should have at least three other members. 3.) At least one member (and not the supervisor) should serve as a discussant.
<p>2.8. The HEI publishes all necessary information on the study programme, admissions, delivery and conditions for progression and completion, in accessible outlets and media.</p>	<p>Improvements are necessary.</p> <p>Redesign of the webpage is planned, but it is not clear when it is supposed to be completed. We were told by students that all the relevant information was available,</p>

	<p>but that the content was not always meaningfully organized, easily accessible, or regularly updated.</p> <p>Call for enrolments are published in internationally available media, but there seems to be no active recruitment or outreach, especially outside of neighbouring countries.</p> <p>Nominally, foreign students can enrol and do enrol in considerable numbers. However, “foreign” almost exclusively refers to students from neighbouring countries that can understand and follow courses offered in Croatian.</p> <p>The programme currently does not offer any doctoral courses in English. We were told that the students can take BA and MA-level classes, but we believe that these (aside from rare and exceptional circumstances) cannot substitute doctoral-level classes.</p> <p>The programme leadership also indicated willingness to organize courses in English for international students who requested them. However, without any English-based courses currently on offer, and without such willingness clearly communicated to prospective international students, it seems highly improbable that any non-Croatian speaker would attempt to enlist and then request courses in English to be organized specifically for them.</p> <p>As we were also told by several module leaders that large share of current doctoral students expressed interest in taking courses taught in English, we would urge the programme to introduce such courses as soon as possible.</p>
<p>2.9. Funds collected for the needs of doctoral education are distributed transparently and in a way that ensures sustainability and further development of doctoral education (ensures that candidates' research is carried out and supported, so that doctoral education can be completed successfully).</p>	<p>Improvements are necessary.</p> <p>As we were only provided a very high-level summary of revenue and spending items, our analysis will be limited in scope and we cannot unequivocally confirm that the funds are indeed “distributed transparently” nor “in a way that ensures sustainability and further development of doctoral education.”</p> <p>However, we have some concerns with the current Guidelines by the HEI that “(a non-obligatory) adequate solution would be to plan for the minimum of 20-25% of revenues to be intended for purposes other than payment</p>

	<p>of service contracts.” (<i>Guidelines for spending postgraduate programme funds for the purposes other than payment of fees under service contracts</i>)</p> <p>We find this approach to be insufficient, both with respect to the defined minimum, and due to its non-obligatory nature. We recommend increasing this minimum, making the target mandatory, and including management of programme funds one of the elements in the overall performance review of programme/module heads.</p> <p>Furthermore, examples of “justifiable” usage provided in the Guidelines (while admittedly, defined as non-exhaustive) do not include funds for students to attend international conferences organized by other academic institutions. The absence of such funding was partly confirmed in practice by the current doctoral students.</p>
<p>2.10. Tuition fees are determined on the basis of transparent criteria (and real costs of studying).</p>	<p>Improvements are necessary.</p> <p>Based on provided summary of revenue and spending items for each module at annual level for 2012-16 period, we have noticed that the spending across modules and across years was consistently significantly below revenues. There was no module in which the five-year average of spend/revenue ratio was more than 0.8, dropping to as low as 0.16 for “International public and private law” module. On the level of the whole programme, the costs were just 50% of the revenues (over the five year period). Assuming that the data we received was accurate and complete, this suggests that with the present cost structure, the tuition fees are from 25% to almost 600% higher than necessary, with the average of 100% for the programme. We recommend decreasing tuition fees and/or increasing spending in support of doctoral candidate’s research and participation in academic conferences.</p>
<p>3. SUPPORT TO DOCTORAL CANDIDATES AND THEIR PROGRESSION</p>	
<p>3.1. The HEI establishes admission quotas with respect to its teaching and supervision capacities.</p>	<p>Improvements are necessary.</p> <p>Technically, FLZ does establish admission quotas in respect to its teaching and supervision capacities. The supervision capacities furthermore suffice for the number of students advancing to the second part of the programme, when a</p>

	<p>supervisor is officially appointed (in the fifth semester or earlier). The teaching workload of supervisors is not exceeding the existing legal thresholds and their quality is adequate. Moreover, FLZ clearly defines the obligations of supervisors and candidates.</p> <p>However, the threshold to enter the programme appears to be excessively low. The fact that, since 2006, less than 1/3 of the students (96 students out of 306) completed their doctoral studies, indicates that too many students are accepted to the programme in the first place. According to the vice dean, in 2016 approximately 70% of the applicants that applied to the programme were accepted. The reason why the remaining 30% were rejected was that they did not fulfil the minimum criteria for enrolment. The expert panel urges FLZ to approach the selection of doctoral students much more critically and to seek capable and committed students, who enrol with the goal of completing their studies. For guidance on stricter enrolment criteria see our recommendation under <i>infra</i> 3.2.</p>
<p>3.2. The HEI establishes admission quotas on the basis of scientific/ artistic, cultural, social, economic and other needs.</p>	<p>Improvements are necessary.</p> <p>The expert panel has not been presented with any valid arguments supporting the fact that admission quotas of the FLZ are based on wider scientific, cultural, social and economic needs. Furthermore, as only 32 out of 306 doctoral students have advanced to the second part of the programme it seems that the quotas are not taking into account the number of students expected to complete the programme (as based on the average completion rate).</p> <p>FLZ states that "(...) most persons who earn a doctoral degree at the doctoral study programme mainly continue to work within the system they belonged to at the time of enrolment into the doctoral study. Consequently, very few PhDs are unemployed." (SER, p.37) The FLZ also states: "These are estimations based on feedback from the candidates who completed the doctoral study programme." (SER, p.37) It is clear that there is a great discrepancy between the number of candidates admitted and the number of those who complete the programme. Information obtained from the few who do finish the programme cannot serve as an argument for the existing admission quota.</p>

The expert panel believes that too many candidates are admitted to the programme, reflecting a lenient admission policy that does not seek for the most engaged and talented candidates. We therefore recommend a much more critical approach to the selection of doctoral students. Aside from demanding the applicants of having obtained a relevant graduate/undergraduate study, a minimum grade point average and the command of two foreign languages, we recommend that FLZ employs additional enrolment criteria. FLZ states in their SER that additional criteria prescribed by the study programme are: two recommendations by university teachers, i.e. persons who have achieved exceptional results in the legal profession; candidate's scientific research interests which are determined in an interview with the candidate and on the basis of the candidate's motivational essay and work experience and professional activity of the candidate. However, in light of the high acceptance rate (70%) and according to the discussion we had with the faculty staff, it appears that these criteria are not applied uniformly across the board.

Expert panel therefore recommends that FLZ establishes additional enrolment criteria, obligatory for *all* study programmes. One would be an obligatory interview with the candidate, with uniform criteria regarding what the FLZ is looking for in a candidate across all modules, set in advance. In addition, a research proposal or alternatively, a personal research study plan, should be submitted by the applicant at the time of enrolment. The proposal or study plan should entail a hypothesis or a research question that has the potential to develop into an original research paper and reflects the candidate's eagerness in uncovering new knowledge in the field of law. The candidate should be able to defend his/her proposal or study plan at the interview. The expert panel furthermore proposes that the candidate is obliged to find a supervisor willing to supervise him/her already before admission. An additional obligatory criterion could be a reference letter from a university professor or a distinguished lawyer (at the moment it appears that this criterion is in practice non-obligatory).

The admission criteria allows for the opportunity to set the tone of the doctoral programme. The panel is thus convinced that it is imperative that the FLZ sends the message to the potential applicants that research and

	<p>innovative critical thinking are at the core of doctoral studies.</p>
<p>3.3. The HEI establishes the admission quotas taking into account the funding available to the candidates, that is, on the basis of the absorption potentials of research projects or other sources of funding.</p>	<p>Improvements are necessary.</p> <p>289 doctoral students out of 306 are self-funded, which is a very high number. Only a fraction of doctoral research is fully funded or co-funded by research projects, economy or some other public source. As FLZ states, “Most candidates at the doctoral study programme are self-funded doctoral candidates, while a smaller number is financed through scientific-research projects.” (SER, p.37)</p> <p>The expert panel recommends that the FLZ takes serious steps in ensuring sources of funding for the research of those doctoral candidates who are not funded from the projects by the Croatian Science Foundation or the Ministry. Additionally, we believe the FLZ should also make an effort to enable all students the opportunity to participate in research projects. FLZ has expressed their intent to do both, however, the expert panel has not been presented with any specific plans as to how these two goals will be achieved.</p> <p>It has been communicated to us several times that a large majority of students are studying while working and that they do not have time to participate in research projects. We find this slightly problematic as doctoral education “rests on the practice of research, which makes it fundamentally different from the first and second cycle”. The European University Association finds that it is the practice of research that creates and cultivates a research mind-set (Salzburg II recommendations, European University Association, 2010, p.4).</p> <p>It is therefore important for students to gain practical experience in doing research if they are to benefit from their doctoral education. We observed a good practice established this year by the EU Law module within the Research Methodology course of students presenting their research to their peers and having an opportunity for feedback and discussion. We believe such practises should be taken on by all departments.</p>
<p>3.4. The HEI should pay attention to the number of candidates admitted as to provide each with an advisor (a</p>	<p>Improvements are necessary.</p> <p>While the <i>doctoral candidate: supervisor</i> ratio, as well as</p>

potential supervisor). From the point of admission to the end of doctoral education, efforts are invested so that each candidate has a sustainable research plan and is able to complete doctoral research successfully.

the ratio between all *admitted doctoral candidates and their supervisors*, indeed is lower than 1:3, the fact that a supervisor is formally appointed to a candidate as late as in the 5th semester (only rarely in the 3rd semester) remains a vital issue. Consequently, many students do not engage in substantial individual research for the first two years of their doctoral studies, which is in stark contradiction with the goals of doctoral education. Therefore, we repeat that according to the European University Association “the goal of doctoral education is to cultivate the research mind-set, to nurture flexibility of thought, creativity and intellectual autonomy through an original, concrete research project. It is the practice of research that creates this mind-set.” (Salzburg II recommendations, European University Association, 2010, p.4).

The expert panel recommends that the significantly greater weight that the FLZ attributes to taught courses, should instead be given to research. For more on this issue see *infra* 2.1 and 4.1.

FLZ states that “(...) advising and directing enrolled candidates is a common concern of the head of the study programme, all teachers in individual programmes, student administration officer, secretary of the study programme and a potential supervisor.” (SER, p.38) It is positive that such a wide range of individuals engage in the well-being of the student, yet it also creates a risk of dispersed responsibility. The expert panel believes that the supervisor is the one who should have an in-depth understanding of his or her student’s individual research progress from the very beginning of his or her doctoral studies. We therefore recommend that the supervisor is formally appointed to a doctoral candidate at the time of admission. It is important to note that the doctoral students the expert panel has had the opportunity to speak to were very appreciative of their supervisors’ availability and willingness to help. However, the expert panel believes that there is a need for a more structured form of support from the supervisor. We recommend an obligatory initial meeting with a supervisor that would take place in the first month of the first semester of doctoral studies. During this meeting, the supervisor and the student should come up with a provisional timetable for the candidate’s individual research. The supervisor should, at the beginning of each semester, set up a few dates for research related tasks for

	<p>the candidate in the form of readings (relevant to the candidate's individual research), writing articles, collecting data and so forth. He or she should, furthermore, invest efforts to make sure that the candidate's research plan is sustainable and that there is a constant progress in the development of his or her ideas throughout each of the semesters. The communication between the supervisor and the student should nevertheless remain flexible. A log of cooperation should be kept in which the supervisor notes the date, form and topic of communication with his candidate.</p>
<p>3.5. The HEI ensures that interested, talented and highly motivated candidates are recruited internationally.</p>	<p>Improvements are necessary.</p> <p>The fact that currently only five foreign students are enrolled in the doctoral studies at FLZ doctoral programme indicates that greater efforts should be devoted to international recruitment. The HEI should take various steps to attract the best international undergraduate and graduate students leaning towards a career in research. A public call to enrol, albeit an international one, is insufficient. FLZ could start by approaching universities that have managed to attract motivated international students and learning from their good practices. FLZ should likewise make funds available for the recruitment and funding of international students.</p> <p>The expert panel was informed that the FLZ does make it possible for foreign students to study in another language, however, there are limitations as to which courses they are able to attend. The expert panel recommends that the FLZ makes an effort to offer classes in English and that it does so <i>officially</i>, not just ad hoc. For more on this issue see <i>infra</i> 2.8.</p>
<p>3.6. The selection process is public and based on choosing the best applicants.</p>	<p>Improvements are necessary.</p> <p>While the selection process indeed is public and the call for applications is published in a timely manner, the admission criteria are not set to choose the best applicants. For the expert panel's recommendations on improving the admission criteria, see <i>infra</i> 3.1.</p>
<p>3.7. The HEI ensures that the selection procedure is transparent and in line with published criteria, and that there is a transparent complaints procedure.</p>	<p>High level of quality.</p> <p>The expert panel finds that the selection procedure is indeed transparent, documented and in line with published criteria. Furthermore, a transparent complaints procedure</p>

	<p>exists with a time limit for complaints and responses to complaints.</p> <p>However, there is still space for improvement. We would like to recommend that FLZ informs rejected candidates that they have a right to review the strengths and weaknesses of their application and, possibly, receive guidelines to improve their research plans.</p>
<p>3.8. There is a possibility to recognize applicants' and candidates' prior learning.</p>	<p>Improvements are necessary.</p> <p>The FLZ allows (exceptionally and under certain conditions) for the enrolment of candidates who have completed another university graduate study programme. Furthermore, according to FLZ staff, admission interviews are sometimes conducted, and when they are, the candidate's non-formal and informal learning are taken into account.</p> <p>The expert panel urges FLZ to conduct interviews, as well as to take candidates' non-formal and informal learning into account as obligatory parts of the enrolment procedure.</p> <p>For more on recommended enrolment criteria see <i>infra</i> 3.1.</p>
<p>3.9. Candidates' rights and obligations are defined in relevant HEI regulations and a contract on studying that provides for a high level of supervisory and institutional support to the candidates.</p>	<p>Improvements are necessary.</p> <p>According to SER, as a part of the enrolment, doctoral candidates have to sign a study contract which determines the status of the student, amount and deadlines for the payment of tuition fee and other fees, as well as rights and obligations of the contracting parties. (SER, p.40)</p> <p>However, the fact that the candidates' rights and obligations are defined in relevant FLZ regulations and in a contract on studying, does not in itself provide for a high level of supervisory and institutional support to the candidates.</p> <p>As noted in <i>infra</i> 3.4, the doctoral students that the expert panel has had the opportunity to speak to were very appreciative of their supervisors' willingness to help. The students had few complaints and noted that overall supervisors are available for consultations (however, some had many consultations and others few) and that they are always given advice if they ask for it. They also noted that</p>

	<p>they are aware of a person to whom they are able to lodge their complaints. Students regularly receive invitations to various events, however, the funding for conferences or study visits abroad is extremely limited.</p> <p>While supervisors are doing a good job in the context of the standard practice of doing things, the expert panel believes that there is a need for a more structured supervisory and institutional support to the candidates. While it is commendable that “the supervisors’ doors are always open to the students”, this also implies that the burden of engagement is always on the student. Far from defending a paternalistic approach, the expert panel simply believes that students need more guidance on how to conduct research. Students will benefit a great deal from supervisors pointing them in the right direction from the very beginning of their studies. For more detailed recommendations regarding supervision improvements see <i>infra</i> 3.4.</p>
<p>3.10. There are institutional support mechanisms for candidates' successful progression.</p>	<p>Improvements are necessary.</p> <p>Existing institutional support mechanisms for candidates' successful progression are insufficient. The number of candidates whose research is directly funded by the institution is low. Likewise, while students stated that they receive invitations to conferences or study visits, the funding available for such trips is extremely limited. The panel therefore recommends that FLZ makes more funding available for doctoral studies, as well as for attending conferences.</p> <p>Additionally, all students should be encouraged to publish more and to co-publish with their supervisors.</p> <p>The expert panel furthermore believes that it is important that students who are self-funded get similar institutional support to those who are employed at the Faculty.</p>
<p>4. PROGRAMME AND OUTCOMES</p>	
<p>4.1. The content and quality of the doctoral programme are aligned with internationally recognized standards.</p>	<p>Improvements are necessary.</p> <p>It is recommended that the PhD programme be improved by rebalancing the relationship between lectures and research in favour of more research and less teaching. This will ensure a quality research-based PhD programme and better align FLZ with comparable degrees in other</p>

jurisdictions. In this regard it is recommended:

- a) That measure 2.5 of the Croatian 2020 Strategy for Education, Science and Technology (adopted in 2014) is implemented, which lists the achievement of a research component of 80% as one of its objectives. Based on the provided module documents and discussions with students, a clear impression was left that FLZ still has a lot to achieve in this respect. Some students indicated that twenty or more exams had to be passed before a research proposal was drafted and accepted and a dedicated supervisor assigned.
- b) In rebalancing the relationship between research and teaching, more attention should be paid to the PhD thesis, as the main aim of a research-based programme. At present, this important aspect accounts for only 60 ECTS (which includes its defence). The thesis component should be expanded substantially.
- c) Courses should be taught only in the first year of the programme, and structured so that they can be reasonably completed in the first year, thereby leaving room for research activities culminating in a thesis in the remaining part of the programme. Some courses are now taught in the second year, and some seemingly even beyond that. Given that the programme is envisaged as a three-year degree programme, this state of affairs raises doubts as to the viability of the current ECTS distribution between the teaching and research components, as well as the research intensity of the doctoral training.
- d) In equipping students with the necessary research skills to independently conduct high quality research, it is recommended that compulsory courses focus more on research design and methodology. This should be done in order to better equip students for producing theses in line with international practice. In reviewing theses, it became apparent to the panel that more attention to research design and implementation would be beneficial.
- e) In designing courses, it is recommended not to reiterate the content taught in the first or second cycle. Students indicated that some courses seem to repeat knowledge already acquired. Only students with a non-law background found this useful; law students did not see the advantage of this practice, and rightfully so. A clear division should be made between PhD and non-PhD degrees. In other words, a clear decision should be

	<p>taken to offer a research-based PhD, and not an LLM and PhD combination. A combined approach inevitably raises questions about the quality of the PhD component and its relationship with the LLM component.</p> <p>f) Having made a clear choice to offer a research-based PhD, the HEI is recommend to assign a dedicated supervisor to each student upon enrolment, and that enrolment is based on the acceptance of a research proposal. This will secure a research focus from the beginning of the programme.</p> <p>g) To ensure that a quality research-based PhD is offered, it is recommended to actively select students based on their research skills and potential. The current admission requirements have the effect of taking in students without a sufficient indication of their research competence and potential.</p>
<p>4.2. Programme learning outcomes, as well as the learning outcomes of modules and subject units, are aligned with the level 8.2 of the CroQF. They clearly describe the competencies the candidates will develop during the doctoral programme, including the ethical requirements of doing research.</p>	<p>Improvements are necessary.</p> <p>While many of the programme learning outcomes are undoubtedly met, it is recommended that:</p> <p>a) In line with 4.1, programme learning outcomes should reflect a clear choice in favour of a research-based PhD, instead of reiterating knowledge already gained.</p> <p>b) More attention should be paid to the achievement of high ethical standards as an important part of such outcomes. The attainment of these standards cannot be considered to be self-evident, but must be actively promoted to avoid complacency. In discussions with supervisors and students, it became clear that good practice in this regard is taken for granted instead of being institutionalised.</p>
<p>4.3. Programme learning outcomes are logically and clearly connected with teaching contents, as well as the contents included in supervision and research.</p>	<p>High level of quality.</p> <p>The learning outcomes stated in the SER are of high quality. We do, however, encourage a rebalance between research and teaching, to ensure that these outcomes are realised for a research-based PhD.</p>
<p>4.4. The doctoral programme ensures the achievement of learning outcomes and competencies aligned with the level 8.2 of the CroQF.</p>	<p>Improvements are necessary.</p> <p>The central focus of a research-based PhD programme should be the completion of a high quality PhD thesis (centred on well-developed, socially relevant research questions/hypotheses, appropriate methods, relevant source analyses and citation standards). Learning</p>

	<p>outcomes should be put into practice accordingly.</p> <p>In achieving this aim, the relationship between the teaching and research components in the programme need to be rebalanced in favour of the latter. See also 4.1.</p>
<p>4.5. Teaching methods (and ECTS, if applicable) are appropriate for level 8.2 of the CroQF and assure achievement of clearly defined learning outcomes.</p>	<p>Improvements are necessary.</p> <p>While interactive and student-centred teaching methods are adopted in some courses, it also became clear to the panel that ex cathedra teaching is prevalent and needs to be reduced. A number of teachers obviously see the benefit of teaching methods other than ex-cathedra, and this should be encouraged among all teachers, especially given that the programme aims at training independent researchers and that student groups are rather small (which invites more interaction and student responsibility).</p>
<p>4.6. The programme enables acquisition of general (transferable) skills.</p>	<p>Improvements are necessary.</p> <p>While employers and alumni were positive about their acquired skills, there is some room for improvement. Transferable skills (such as ethical and writing skills) could be reflected in a more explicit manner throughout the programme, rather than be by-products.</p>
<p>4.7. Teaching content is adapted to the needs of current and future research and candidates' training (individual course plans, generic skills etc.).</p>	<p>Improvement are necessary.</p> <p>The number of (compulsory and elective) courses per module is quite wide-ranging, and – as confirmed by students – in some cases repetitive in content. From this point of view, it can be questioned whether the courses are helpful or even necessary for writing PhD theses. Students have, however, indicated that some courses are quite flexible to their research needs, and this should be ensured across the board in presenting courses that relate directly to PhD research.</p>
<p>4.8. The programme ensures quality through international connections and teacher and candidate mobility.</p>	<p>Improvements are necessary.</p> <p>Taking note of FLZ's number and range of international contacts this point, however, cannot be evaluated as 'high quality'. While there are opportunities and funds for exchange, the high workload of some teachers poses questions as to whether the opportunities are always practical. As to students, it is advisable to encourage students more, or even require of them to make use of international opportunities for enriching their PhD</p>

	<p>training. By focusing less on teaching, more attention could be paid to internationalisation for students. A number of the agreements listed are quite recent; this is promising for the internationalisation of the FLZ and should be continued.</p>
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NOTE: RECOMMENDATIONS OF THE EXPERT PANEL TO THE ASHE'S ACCREDITATION COUNCIL AND QUALITY LABEL

The role of the Expert Panel in the re-accreditation of doctoral study programmes is manifold. The Expert Panel or part of the Expert Panel visiting a higher education institution drafts a report on the basis of a self-evaluation report, the accompanying relevant documentation, and a site visit to HEI. The draft report is adopted by all members of the Cluster Expert Panel, while the president of the Cluster Expert Panel is responsible for coordinating the assessment levels.

The report contains an assessment on whether a doctoral study programme delivered at a higher education institution complies with the prescribed laws and by-laws, as well as any additional/recommended requirements defined by the Agency's Accreditation Council, and whether a higher education institution can obtain a positive, i.e. satisfactory quality assessment according to the criteria set out in this document. Moreover, the Expert Panel must make recommendations for quality improvement.

Based on the assessment of all these elements, the Expert Panel may propose to the Accreditation Council of the Agency to issue either a confirmation on compliance, a letter of expectation for the period up to three (3) years in which period the higher education institution should eliminate the identified deficiencies, or to deny the license.

If the Expert Panel has assessed that a doctoral study programme delivered by a higher education institution does not meet legal and other requirements or that the quality of a study programme is not ensured (i.e. that HEI does not meet additional requirements or recommendations made by the Accreditation Council, or has a very poor quality assessment), they should propose to the Accreditation Council to deny the license.

If the Expert Panel considers that the relevant laws and bylaws have been met by a higher education institution, but that certain elements mentioned above do not meet the quality requirements, while they consider that the identified shortcomings can be corrected within a time frame of three years, they should issue a letter of expectation.

If the Expert Panel considers that all legal and additional/recommended requirements have been met and the quality assessment is satisfactory, i.e. that a study programme fulfils the learning outcomes appropriately defined for that level and scientific area, they may propose the issuance of a certificate and have a HEI commit to quality improvement and reporting to the Agency during the follow-up period.

Finally, if the Expert Panel has, in accordance with the criteria mentioned above, proposed issuing the certificate of compliance and assessed that, in addition to meeting the minimum quality requirements – i.e. the qualification framework level - for a study programme, the programme should be identified as a doctoral programme of a 'high level of quality', the Expert Panel may propose to the Agency's Accreditation Council that such a doctoral study programme be awarded the 'high quality label'. Thus the Agency, with the consent of the Accreditation Council, grants a higher education institution the right to use the label for their academic and promotional purposes.

The 'high quality label' cannot be proposed or awarded to a programme or a higher education institution that does not comply with the requirements laid down by the laws and bylaws mentioned in this document, and any additional requirements recommended by the Accreditation Council. Moreover, the quality assessment awarded to a study programme should reflect a high level of quality inasmuch that at least half of the sub-criteria in each of the quality assessment criteria are assessed as being of high quality. The Accreditation Council of the Agency issues a final opinion on the label awarded. The content and form of the quality labels shall be prescribed by the Agency in a relevant general act.

The Accreditation Council of the Agency discusses the final report with all recommendations and suggestions, and issues their opinion on the report. Based on a prior opinion of the Accreditation Council, the Agency issues an Accreditation Recommendation to the minister responsible for science and higher education, and upon receipt of the minister's final decision on the outcome of the procedure, awards the 'high quality label' to a higher education institution.