

FINEEC's self-assessment report for the ENQA targeted review 2026

4.8 ESG Standard 2.7 Complaints and appeals - Institutional quality audit and EUR-ACE accreditation

Standard

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

ENQA 2022 review – substantially compliant

The agency is recommended to establish a formal complaints procedure. The procedure should be made known to all concerned parties.

Suggestions for further development

FINEEC is encouraged to open its appeal process in a way that all decisions can be appealed.

EQAR decision – partially compliant

- Since the registration of the agency on EQAR in 2011 the Committee has flagged for attention the lack of formal complaints system in the agency. The Committee has learned from the review report that the remarks on the review process are still given in an informal manner; hence there is no change of the status quo.
- The Committee has learned that no advancements have been made in regard to the appeals procedures, i.e. the institutions undergoing a review by FINEEC are still limited to make an appeal only in a case of a negative outcome.
- Following this, the Committee found that the earlier concerns have not been addressed and that the agency remains only partially compliant with the standard.

Institutional quality audit and EUR-ACE accreditation compliance

TABLE 3. Number of appeals 2020-2026 and complaints 2024-2026

EQA activity	Complaints	Appeals
Audits	0	0
EUR-ACE accreditations	0	0

FINEEC offers several channels through which HEIs may submit complaints or appeals. Following the recommendation from the ENQA external review, an appeal procedure was introduced in the second audit cycle. A complaints procedure was later introduced as a follow-up action to the ENQA external review 2021-22. Both procedures have been communicated to key stakeholders through email, newsletters, press releases and FINEEC's website. To strengthen communication about the procedures, HEIs will be informed about the complaint and appeal procedure during the audit's start up meeting, also referred to as the agreement negotiation, between FINEEC and the institution.

Complaint procedure for higher education evaluations

HEIs may submit a complaint concerning FINEEC's higher education evaluation activities, including audits and EUR-ACE accreditations. Complaints may address dissatisfaction with the conduct of the evaluation process or with the actions of the evaluators.

Principles for complaint procedure

- The complaint must concern either the evaluation process or the conduct of experts.
- Only HEIs may submit complaints. Anonymous submissions are not processed.
- Complaints must be submitted within six months of the publication of the evaluation, audit or accreditation.
- Only complaints that fall within FINEEC's statutory remit are processed.
- Complaints are processed within one month of receipt. A written response is provided, and the scope of the response is proportionate to the issue raised.

Complaints are initially handled by FINEEC's Director or the Head of the Higher Education and Liberal Adult Education Unit, who decides whether the response should be prepared by FINEEC staff or submitted to the Higher Education Evaluation Committee or the Committee for Engineering Education. FINEEC aims to address complaints in a constructive manner focused on improvement. HEIs may submit complaints through an online form available on FINEEC's website.

Audit appeal procedure

A HEI that has undergone an audit or re-audit may request a re-assessment of the audit result. The purpose of the appeal procedure is to ensure equal treatment of HEIs and fairness in the decision-making of the Higher Education Evaluation Committee.

Appeals may be submitted in cases where:

- the HEI does not pass the audit and a re-audit is required, or
- the HEI does not pass the re-audit.

The appeal must demonstrate that the audit was not conducted in accordance with the audit manual and that this may have compromised equal treatment. Appeals may only be submitted by the HEI concerned.

Decisions of the Higher Education Evaluation Committee are expert opinions rather than administrative decisions. They cannot be appealed under the Administrative Judicial Procedure Act. Instead, appeals are reviewed by an expert panel appointed by the Evaluation Council. The composition of the expert panel and a

description of the procedure are available on FINEEC's website. To date, one request for a review of an audit result has been submitted, relating to an audit carried out in September 2016 during the second audit cycle. In the fourth cycle, the audit appeals process has kept its focus on the audit outcome. FINEEC has not considered it necessary to extend the appeals process to other decisions of the Higher Education Evaluation Committee. The Evaluation Committee's only other decision in the audit process concerns the appointment of the audit team, whose composition the HEI can comment on prior to appointment. In addition, the complaints procedure provides HEIs with the opportunity to file complaints regarding all aspects of the audit process.

In addition to the formal complaint procedure, FINEEC systematically collects feedback from evaluation objects and evaluation teams after every evaluation, including audits. A broad stakeholder survey, which includes higher education stakeholders, is conducted biannually, and a general feedback channel is available on FINEEC's website. The FINEEC website also includes information on the external reporting channel maintained by the Office of the Chancellor of Justice for reporting suspected misconduct by authorities.

EUR-ACE engineering programme accreditation appeal procedure

A HEI that is not satisfied with the conduct of the accreditation process by FINEEC or with the accreditation result may use FINEEC's appeals procedure for Engineering Programme Accreditations, which is available on FINEEC's website. The same procedure applies to audits.

The procedure will be applied to accreditations performed in accordance with the Standards and Procedures for Engineering Programme Accreditation - the Updated Version 2025 (FINEEC, 2025b).

The request may be targeted at the following accreditation results decided on by the FINEEC Committee for Engineering Education:

- The degree programme is conditionally accredited or
- The degree programme is not accredited.

The request may be based on the grounds that the accreditation has not been performed in compliance with the accreditation manual, and that the accreditation, as performed, brings into question the fair and equal treatment of HEIs and the degree programmes. The request is filed in accordance with the procedure described in a document on the FINEEC's website. The request can only be filed by the HEI and the degree programme whose accreditation result the request concerns.

FINEEC has an expert panel, whose task is to handle the appeals. The panel consist of three members, who represent both universities and universities of applied sciences. Composition of the expert panel is available on the FINEEC website.

Areas improved

A complaints procedure was developed for FINEEC's higher education evaluations after the last ENQA external review.

Areas to be improved

In future, the appeal and complaint procedure for audits should be mentioned in the agreement negotiations with HEIs.

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The new expert panel for audit appeals for the fourth-cycle audits will be appointed by the FINEEC Evaluation Council at the beginning of its mandate period. The new Evaluation Council was appointed by the Government in June 2026.