The purpose of the student ambassador is to strengthen students’ legal rights and advise them in relation to their encounters with the University of Copenhagen (UCPH).

The student ambassador is ambassador for the entire University. The student ambassador shall contribute to strengthening dialogue and mutual understanding between students and UCPH.
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1. Introduction and reading guidelines

The student ambassador function was set up by the Board and the rector in 2013, with a view towards (inter alia) reinforcing the organisation’s focus on students’ legal rights and strengthening dialogue and understanding between the students and the university organisation.

The recommendations contained in the student ambassador’s annual report report for 2017 is on the basis of impressions from the approximately 1% of University of Copenhagen (UCPH) students who approached me during 2017 concerning ongoing cases and from meetings with UCPH student organisations, administration and interest organisations since April and the 2016 Annual Report, etc.

Thank you

I would like to thank student organisations, faculties and departments, central administration and interest organisations for having welcomed me with a curious mind and for giving me open and direct insights into your daily work on maintaining focus on students’ legal rights and strengthening dialogue and understanding between the students and UCPH administration.

I would like to thank my predecessor, Tina Kaare, for her status report on the work of this function and its relevance in the organisation in the form of the 2016 Annual Report and for having worked towards the establishment of some clear daily guidelines for the work of the student ambassador since the function was launched in 2013.

I would also like to thank the university’s student guidance services for their participation in the development and dissemination of a Facebook campaign in October and November about student rights and responsibilities. Postings on the student ambassador’s Facebook page usually receive between 500 and 1,000 views. The majority of the campaign’s postings in Danish were viewed almost 7,000 times, mainly because they were shared by student guidance services.

I would also like to thank all my colleagues in the European Network of Ombuds in Higher Education and the Scandinavian student ombuds network for their warm welcome and for sharing their enormous collective knowledge about the work of student ombuds work in most of the western world, for nearly fifty years.

Reading guidelines

The report is divided into three recommendations (chapter 2) and impressions which support these recommendations (chapter 3).

In this year’s report, large parts of the "Impressions which support recommendations" chapter are particularly wide-sweeping and summary in their nature, being very much a status report. I would thus like to try and make it clear to our stakeholders, how broadly I consider that the organisation is working to strengthen students’ legal rights and related dialogue and where I am able to see in specific terms that there is a basis upon which to continue working with further improvements.

Over time, the Annual Report has proved to have several functions and has therefore also been written bearing in mind several target groups. In general terms, the Annual Report is a proposal for discussion by the Board, as well as relevant management forums and collegiate bodies before the report’s final publication. Once the Annual Report has been published, it becomes a document that parts of the organisation can refer to. Likewise, the report becomes documentation for the organisation and the outside world of the basis for my work in the years ahead, in terms of the strengthening of dialogue and understanding between the students and UCPH.

Student Ambassador Bo Gad Køhlert
January 2018
2. Three recommendations

For the academic year 2018-2019, I recommend the following focus:

1. The entire administration of UCPH becomes increasingly better at communicating clearly and in a correct and timely fashion when processing students’ applications, complaints and disciplinary proceedings.

2. All study boards, exemption committees etc. keep working on the implementation of the university’s indicative guidelines on the processing of applications from students with disabilities.

3. Administration in all situations under recommendations 1 and 2 increases focus on moving administration culture towards improving coherence between:

   1. The student’s legal rights: Relevant regulations forming the basis for the ruling etc.
   2. The student’s sense of justice: The student experiencing that she or he has been treated fairly.
   3. The time the student has to complete her or his course.

I look forward to participating in meetings in the spring of 2018 with the Academic Board on Education Strategy (KUUR), The Study Administration Coordination Committee (SAK) as well as management teams and The Board, in order to discuss possible actions in the academic year 2018-2019 on the background of the three recommendations listed above and my impressions from 2017 as described in the following.
3. Impressions which support recommendations

All sub-chapters in this chapter support and expound upon the above recommendations. Impressions were collected during the whole of 2017 within the context of advice provided to students by the student ambassador and from meetings with UCPH’s administration and the outside world.

3.1 424 inquiries in 2017

During 2017 there was a total of 424 inquiries to The Student Ambassador. This corresponds to approximately 1% of the total number of enrolled students.¹

Since April, we at the The Student Ambassador’s office have worked towards extending the categorisation of each inquiry. Because categorisation from January to March was less detailed, the following summary is slightly unclear about the types of students we were approached by and what their inquiries concerned. But the following patterns can be derived from the contact statistics:

The figure above of the number of quarterly requests from 2015 to 2017 show that the number of requests has fallen from 2016 to 2017. The figure also shows that this decrease in number of inquiries is in the first and second quarters of 2017 (Q1 and Q2). One major reason for the decline is probably that the work to increase awareness of the ambassador’s function was reduced by the end of 2016, inter alia, to await the appointment of a new student ambassador on April 1st.

If you look at the 3rd and 4th quarter in isolation, Q3 and Q4 totaled 43 more inquiries in 2017 than in 2016. This is an increase in number of inquiries of just over 19%. Almost the entire increase is also in Q4. The increase is mainly attributable to reports on the ambassador’s function since April 2017 (appointment of new student ambassador, publication of annual report 2016, amendment of rules of procedure, etc.), invitations to host a handful of intro events for new Danish and international students and a facebook campaign in October and November about student’s rights and duties.

1 There are currently approximately 38.600 enrolled students according to velkommen.ku.dk/tal-og-fakta
Most inquiries concern cases that are already ongoing. Typically, the student is in need of advice about:

- management of a complex and very unfamiliar situation.
- account of longer-term situation and in this context often a summary of events in the contact between student guidance services and study administration.

At the same time the student is asking for guidance about administrative practices and combined reading of rules, guidelines etc. within a case area based on the specific situation.

Students are usually referred to specific counselling services at departments, faculties or the Central Administration when they seek information about education content, study board procedures, local processes etc., and when it becomes apparent that they are in need of student guidance.

It is expected that over half of all inquiries come from bachelor students. As new students in the university sector, this group of students should be expected to be less familiar with rules and frameworks etc. If we consider the individual case categories, this expectation is particularly supported in the form of inquiries about disciplinary cases, 67% of which come from undergraduate students.

Inquiries from employees have concerned the management of the legal conditions of groups of students.

By their nature, inquiries from PhD students have concerned matters relating to employment conditions. They were therefore referred on to more specialised advisory offerings.
When considering the actual number of inquiries, the majority of these should be expected to come from students of SCIENCE, HEALTH and HUM, as these three faculties have the largest student populations.

The students from other Danish universities were referred to advisory services at their own university.

The UCPH student at the foreign university was in legal difficulties concerning a course during the exchange stay and we managed to guide that student to the university's local Student Ombuds.

When we consider the number of inquiries from each faculty in comparison with the total number of students at each faculty, 2017 saw the greatest need for advice from students at THEO, LAW and HEALTH.

For THEO, the statistical disparity needs to be borne in mind that a single inquiry in percentage terms represents a significantly larger proportion of the faculty's total number of students than the other faculties.

SCIENCE, HUM and SOC.SCI. have a below average rate of inquiries to the student ambassador of approximately 1% of the university's total number of students.
Most contact categories are not unexpected, neither in terms of content nor percentage distribution. In this context, I found cause to expound upon the following categories:

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exam</td>
<td>22%</td>
</tr>
<tr>
<td>Legal complaint</td>
<td>21%</td>
</tr>
<tr>
<td>Exemption</td>
<td>16%</td>
</tr>
<tr>
<td>Admission</td>
<td>7%</td>
</tr>
<tr>
<td>Disenrolment</td>
<td>7%</td>
</tr>
<tr>
<td>Admission guidance</td>
<td>7%</td>
</tr>
<tr>
<td>foreign students</td>
<td>7%</td>
</tr>
<tr>
<td>Disciplinary proceedings</td>
<td>5%</td>
</tr>
<tr>
<td>Other</td>
<td>4%</td>
</tr>
<tr>
<td>Leave of absence</td>
<td>3%</td>
</tr>
<tr>
<td>Credit Transfer</td>
<td>2%</td>
</tr>
<tr>
<td>Postponement of thesis</td>
<td>2%</td>
</tr>
<tr>
<td>Absence due to illness</td>
<td>2%</td>
</tr>
<tr>
<td>SU</td>
<td>1%</td>
</tr>
<tr>
<td>Student guidance</td>
<td>1%</td>
</tr>
</tbody>
</table>

Inquiries concerning examinations are dealt with in the chapter “3.3.1 Inquiries from students with complaints about examinations” below.

The category Legal complaint encompasses cases where the student argues that the university has ruled on an basis that is incorrect or insufficient. The university should continually work towards minimising this type of case as far as possible. The correspondence and decisions that I have had insight into in this category indicate that UCPH’s management should continue to focus on working on the following points:

- Clear communication that fully considers the target group,
- sufficiently in-depth, relational justifications
- justifications that are formed on a sufficiently informed basis that are compliant with all laws, regulations, guidelines and legal practice pertaining to the case.
- cohesive argumentation (no assertions without clear evidence)
- Clear references to laws, regulations, guidelines etc. that are easily verified.
The students I have advised in exemption cases often have unusual personal situations and study situations and they generally describe extended incidents and case procedures. It is my impression that administration deals appropriately with most cases in this category. Nevertheless, we see indications that students’ cases can be clarified in a more complete manner. This is dealt with in chapter “3.3.2 Sufficient disclosure of the student’s situation” below.

The number of inquiries in the Admissions category is to be expected, as admissions and acceptance regulations are both comprehensive and complicated to navigate.

The number of inquiries in the Disenrolment category is also predictable. Study progress reforms appear to now be at a point where they have been fully implemented across the system and at administrative level and the practice of the study board, such as for exemption for more than three examination attempts and exemption for an extension of the maximum duration of study time has now been clarified as part of the processing of applications. I am also seeing examples where students’ cases can be clarified more in a more complete manner. This is dealt with in chapter “3.3.2 Sufficient disclosure of the student’s situation” below.

The Admission guidelines for foreign students category contains inquiries which have all been referred on to the university’s admissions guidance services. From April of this year there began to be an increase in the number of inquiries from English-speaking students about general guidance issues relating to their application for admission to UCPH. During May we discovered that studies.ku.dk/contact referred to the student ambassador’s contact information in a way which could be understood as meaning it was the primary point of contact for the common admissions guidance service. The referral on the website was changed at the beginning of September and since the end of August we have only had a few inquiries in this regard.

My insight into the processing of disciplinary proceedings, shows that the university should continue to work at a broader level towards the clarification of frameworks for when heads of studies require students to attend interviews concerning cheating in examinations and the linguistic tone of the preliminary and subsequent written components of the proceedings.

<table>
<thead>
<tr>
<th>Inquiries about disciplinary proceedings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bachelor’s degree students</td>
</tr>
<tr>
<td>67%</td>
</tr>
</tbody>
</table>

Inquiries concerning disciplinary proceedings primarily come from bachelor students and are mainly in connection with accusations of academic malpractice/plagiarism. This is an indication that it would be a good idea if information about and training in academic probity (including correct quotation, source attribution etc.) was given greater priority on bachelor courses. In the cases I have insight into, I hear that most students experience being communicated to as if guilty when they are called in for interview by the head of studies. At the same time, most wanted greater clarity about the process up until they receive the university’s ruling.

The category other covers inquiries about psycho-social conditions, admissions guidelines for Danish students, intellectual property rights, UCPH Housing Foundation, insurance, lack of diploma etc. We refer almost all these inquiries to other guidance services. The same applies to inquiries in the Student guidance services category.

The SU category encompasses a number of questions about exemptions and legal issues in relation to The Danish Student’s Grants and Loans Scheme (SU), including a number of students with disabilities, who also find themselves in difficult situations because of the differences between UCPH’s operational requirements
and SU operational requirements.

There is nothing in particular that requires comment concerning the other categories leave of absence, credit transfer, postponement of thesis and absence due to illness.

**Students with disabilities or illness**

A fifth of the inquiries that we receive come from students with disabilities or suffering from long-term illnesses and illnesses that are more intrusive than average. This appears to be a significant over-representation in relation to the total student population of this type at the university.²

That this group has a significantly greater need of advice is supported by impressions from specific cases. These cases also indicate that it is becoming increasingly more difficult for this group to have a real chance of completing a course of higher education due to the tightening of regulations and practices as a result of the study progress reform and SU operational reform. At the same time, this is a great cause for concern, considering the provisions of the act on the prevention of discrimination that relate to direct and indirect discrimination.

On the basis of chapter 3.1 it is recommended that the administration discusses actions to be taken in the academic year 2018-2019 in order to counter the issues presented above under the categories Legal Complaint, Disciplinary Proceedings tttT SU.

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² Based on the approximately 250 students who enrolled as students with disabilities in connection with their study start in the year 2017, compared with the approximately 13,000 students who enrolled in 2016 (according to tal.ku.dk) the number of inquiries from this group should be closer to 3-5%.
3.2 Impressions from dialogue with students and administration since April 2017

As the background for these recommendations, the following summarises the most significant impressions from the new student ambassador’s meetings and discussions with students and administration since starting the job on 1 April. All meetings were conducted in a positive atmosphere involving a widespread willingness to share detailed insights into activities etc. In my recommendations I attempt as far as possible to take account of and build on top of the measures that have already been launched at the university.

3.2.1 Students and interest organisations

Since beginning employment in April as the new student ambassador, I have received a number of impressions from students and interest organisations through participation in the meetings of The Rector’s Dialogue Forum and the Academic Board on Education Strategy (KUUR), conversations with students from the university board, the student council’s agenda committee, presidencies of Conservative Law Students, United Law Students and the Medicines Council, conversations with the Student Union building, the Institute for the blind and visually impaired and the Danish Handicap and Graduate Society, as well as conversations with the students who contact the student ambassador on a daily basis. I continue to work towards expanding the student ambassador’s contact base to other student political associations at the university and other interest groups.

During these dialogues it has been requested that the student ambassador:

- affect bureaucratic transparency by following and affecting:
  - how work is being done across educations and faculties to harmonise what the administration deems "special circumstances".
  - how each of the study boards and case processing units ensure that the student’s situation is sufficiently clarified in connection with an application or a complaint.
  - case processing times.
  - the practice that the administration has built with regard to study progress rules, the management of master’s thesis agreements in the context of the planning of the master’s thesis period (so masters qualifications can be completed within 22 months), and credit transfer of elective subjects across qualifications, faculties and universities.
  - study situation for students with disabilities, stress diagnoses etc.

- bear in mind the well-being of the student, because certain decisions, such as the disenrolment of a student (and not least the long processing time in this context) can have extremely serious consequences for the student’s life situation, accommodation situation/entitlement to hall of residence accommodation, economic situation etc.

- develop further guidelines for students.

- explain the administration’s needs and expectations of students who address the student ambassador.

- fight on behalf of student groups and students with regard to the interpretation of "special circumstances" etc.

- work towards finding a physical location for the student ambassador’s offices, which provides access to students coming in directly from the street.
In a number of conversations, students also proposed that the administration should, in its decisions:

- refer to the students’ option of obtaining independent and anonymous guidance from the student ambassador in rulings which contain a full or partial rejection.
- provide the students with guidance about her or his options for action, what can be done in specific terms and what she or he needs to pay special attention to subsequently, after the student has received the decision, e.g. in connection with an exemption for special examination conditions, advance approval of credit transfer as the basis for an application for a foreign scholarship etc.

My impressions from conversations with student guides from the Institute for the blind and visually impaired, the chairman of the Danish Handicap and Graduate Society and students with disabilities with specific difficulties in their study situation is furthermore that opportunities for students with handicaps to complete a course of higher education have sharply deteriorated in recent years, particularly because of study progress reforms and the SU operational reform.

It is therefore good news that it was specifically mentioned in the Danish parliamentary agreement on a new unds allocation structure3 that:

- "(32) With a view to supporting all students and their opportunity for a positive study progression and complete their education, the parties agreed that each institution must have a “supplement” to the standard study duration, measured on the basis of the proportion of students on maternity leave, students with additional SU “clips” because of illness and students who are receiving disability allowances."
- "In addition, the minister for science and higher education will follow up on issues in connection with institutions’ exemption practices for students with disabilities and illness and coherence across the education system with a view to dialogue with the institutions with a view to resolving any challenges."

3.2.2 Faculties, Central Administration and transversal co-operations

The many impressions from visits to faculties and the central administration since my appointment as new student ambassador in April, present a rough but reassuring image that work is being done to reinforce students’ legal rights and establish clarity in students’ meeting with university administration across a large number of areas.

Parallel to this, I am experiencing great willingness within the organisation to think through students’ entire legal situation. One manifestation of this is that the Student Ambassador is invited to various reference groups involving the further development of frameworks related to students’ courses. I am currently participating in reference groups in the projects "From course pages to study information" and "Quota 2 admission of the Future" and in a reference group for better study administration at The Faculty of Law.

From November 24th - https://ufm.dk/lovstof/politiske-aftaler/nyt-bevillingssystem-for-de-videregaende-uddannelser
Impressions from visits to faculties

Of many reassuring impressions, the following particularly stands out at the faculties concerning their support and further development of work concerning case processing and advisory roles - in certain areas at a single faculty, in others at several faculties in comparable ways:

<table>
<thead>
<tr>
<th>Some guidance and case processing teams are engaged in ongoing dialogue about the status of students’ current exemption applications etc. (e.g. through sharing of overviews/common systems with an overview of current cases.)</th>
<th>A number of case processing teams are recording and monitoring ongoing cases in case processing systems on a weekly basis, at so-called whiteboard meetings and similar.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The same case processing team is preparing and finally processing students’ applications and complaints to several/all faculty study boards and their credit transfer and exemptions committees where relevant.</td>
<td>In connection with the instructions about maximum study duration, work is being done in several areas with a specific view to make guidances as clear as possible in spite of a non-uniform regulatory basis in this area for the latest handful of student admissions years. Counsellors are trained to take KUnet formulations as a starting point.</td>
</tr>
<tr>
<td>Time is being allocated so that case processors can work to become even better at writing clear decisions and reasonings on employee days, in the form of workshops with communication and case processing specialists, paired learning, reading each others’ decisions etc.</td>
<td>Several areas also report a fixed cycle for reporting to management about case processing times, number of cases etc.</td>
</tr>
<tr>
<td>Some case processing teams call the students by telephone in cases that appear to require further clarification.</td>
<td>Several areas mention the review and adjustment of case procedures and letter templates, with a view to reduced case processing times and the assurance of basic administrative principles.</td>
</tr>
<tr>
<td>Students’ input into teaching environment assessments is being converted into specific improvements in case processing.</td>
<td>Standard letter templates are being created and shared to help support the clear dissemination of decisions, sufficiently reasoned rejections and clear and correct references to the regulation basis for the decisions that students receive.</td>
</tr>
<tr>
<td>At some faculties, we were told about local case processor networks and coordination committees where difficult cases are discussed and uniform case processing practice is coordinated.</td>
<td></td>
</tr>
<tr>
<td>In certain areas, newly elected study boards are offered introductory courses in administrative law, processing of applications etc. and newly appointed heads of studies are given guidance in the processing of reported plagiarism, the processing of complaints about tuition and guidance etc.</td>
<td>The individual student is in some areas given notice up to a year ahead of a possible breach of rules for passed ECTS points per study year and maximum study duration etc.</td>
</tr>
</tbody>
</table>
**Impressions from visits to Central Administration**

Among the measures being taken by the central administration, the following particularly stands out in connection with the reinforcement of students' legal rights:

Committee support and project management of transversal initiatives in a number of areas under the UCPH’s Academic Board of Education Strategy (KUUR) and the Study Administration Coordination Committee (SAK):

- SAK and SAK sub-committees
- annual conference for members of all study boards
- further development of common communication platforms (e.g. "KUnet 2")
- further development of common information and communication structures (e.g., "From course pages to study information.")
- Further development of common systems for the digital support of the case and working processes (e.g. KUforms, Digital Examinations, replacement of the STADS system to check study progress)

Reappointments over the last year for two positions in the Rector's Secretariat, with focus on case processing in disciplinary proceedings despite a difficult recruitment situation which, for a period, led to an increase in the processing times for cases of this type.

Clear organisational support for the processing of complaints to the rector concerning legal issues and the recruitment of another legal employee in the Section for Strategy & Policy for the processing of cases of this type.

**Insights into transversal co-operations**

The following transversal co-operation between faculties and central administration particularly stand out:

The Study Administration Coordination Committee (SAK) and the underlying committees meet monthly to discuss transversal administrative course partnerships and uniform treatment of students across the various faculties and between faculties and Student Services.

In recent years, academic services have invited all study board members to an annual so-called study board conference. Each conference focuses on a topical issue and discusses a number of case processing cases - in 2017 for example applications for more than three examination attempts and applications for special examination conditions.

Further development of each student’s course page on KUnet in the project “From course pages to study information”.

Preparation and decision about a common interpretation and allocation of competences between study boards and faculty administrations when processing credit transfer and exemption cases according to the admission orders, the university programme order and the examination order.

Implementation of the strategy to support of students with disabilities at UCPH through the Action Plan for 2016 to 2018 including the establishment of the Special Study Support Team within University Education Services (US) and the preparation of “Guide to legislation, regulations and case proceedings for students with disabilities” for the study boards and staff at UCPH.

General openness towards sharing good examples, e.g. letter templates and willingness to help each student in the best possible way.
3.2.3 Effect of recommendations of the 2016 Annual Report

The recommendations in the Student Ambassador’s 2016 Annual Report and the work within the organisation that was based on them form of course part of the foundation on which recommendations in the 2017 annual report are based. UCPH’s administration was recommended the following in the 2016 Annual Report:

1. Focus on rights for students with disabilities
2. Better guidance and faster case processing in disciplinary cases
3. Better justifications in rulings
4. Use the student ambassador

It can be seen in the above review of my visits to faculties and the central administration that the organisation has taken these recommendations on board. At the same time, both the recommendations and the impressions in this report for 2017 suggest that work still needs to be done on the basis of the recommendations of the 2016 annual report.

In the 2016 Annual Report, students were recommended to:

5. use their examination attempts and the option to report sick

The most practical ramifications of these two recommendations for students are a number of visibility initiatives since April, including study start events for students, student associations’ meetings for students and new members of the study boards etc. as well as our campaign on student rights and responsibilities.

In connection with the visibility initiatives we have had a particular focus on emphasising that you should use your examination attempts with due consideration. At the same time, these measures appear to have resulted in my having received a growing number of inquiries for the rest of the year.

3.2.4 Decisions in paritetic 12-man committees 2014 and 2016

My recommendations on the basis of impressions from 2017 also appear to be in line with the recommendations of the so-called paritetic 12-man committees in 2014 and 2016.

One of the things that the paritetic 12-man committee agreed on in 2014 was that:

- “[…] a common indicative case processing time should be established of a maximum of six weeks in the case of credit and exemption cases (unless the nature of the case dictates a need for longer or shorter case processing times).”\(^4\)
- “[…] transversal quality assurance should be initiated with focus on transparency and knowledge sharing about administrative case practice. For example in the form of an annual conference or meeting with the participation of the study board chairs and vice-chairs, both internally from the faculty of and transversal within the University of Copenhagen, where practices and decision-making for the processing of the individual types of credit transfer and exemption cases can be discussed and compared.”\(^5\)

\(^4\) Report February 2014, p. 12
\(^5\) Report February 2014, p. 12
The 2016 paritetic 12-man committee found in its report from May 2016 that initiatives had been initiated on the basis of the above two points; including the two study board conferences that were held in 2015. At the same time, the Committee summed up (inter alia) these points from the Management team on the University of Copenhagen’s action plan in the light of the Touch point analysis (elaborated below):

- Course pages version 2.0 (which was launched in 2017 in the “From course pages to study information” project)
- Study messages on the basis of the student’s situation (*“Study messages on KUnet must be more recipient-friendly and action-oriented.”*
- Proactive case processing (*“students must have a clear and rapid response to their inquiries at course administration; and the time that administrative staff spend on case processing must be minimised.”*)
- The student as the focal point - the certification of study administrative staff (*“Study administrative staff knowledge about students’ life, experiences and challenges needs to be strengthened and the employees must be given the ability to streamline processes.”*)

My insights in 2017 show that it will be important to work towards the further broadening of these elements.

### 3.2.5 Recommendations in the Touch point analysis

Communication of most of the student cases into which we had insight during 2017 could be considerably strengthened by working specifically on the basis of the three development tracks of the so-called touch point analyses (Spring 2015). The investigation’s formulation of the three development tracks (see figure on this page) can be reformulated into a legal context on the basis of my insights in 2017:

- Close interaction: To construct rulings with a responsive starting point that is based on the student’s perspective
- Constructive contact: To write in a simple and action-oriented manner
- Stable relation: When a student contacts us because there has been a mistake, administration should accommodate her or him with a careful and committed follow-up.

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6 Report 2016, p. 13  
7 Report 2016, p. 13  
8 Report 2016, p. 14
Two of the ten ideas for better communication between students and UCPH in the Touch-point analysis are also directly communicable to the developmental requirements we are able to see on the basis of inquiries in 2017.

We have seen a few examples of how the idea “Study messages that are based on the student’s situation” unfortunately should also be extended to “Study messages that are based on the student’s situation and rights”.

Study messages could come across as decisions if they contain interpretations of legislative paragraphs, study regulations etc. that have a direct and restrictive effect on the specific student’s study situation. I see a need for the addition of clearer guidelines for exemption and complaint options in such study messages.

On the basis of chapter 3.2 it is recommended that actions to be taken in the academic year 2018-2019 that maintain and refine existing local and transversal efforts are discussed.
3.3 Further explanation of the year's most prominent types of inquiry

As explained in the chapter "424 inquiries in 2017" above, the following is also an elaboration of some of the most prominent contact types this year: inquiries about examinations, exemption, disenrolment and students with disabilities. In these types of cases, particular potential can be found for strengthening many students' legal rights and sense of justice.

3.3.1 Inquiries from students with complaints about examinations

Over a quarter of the inquiries we received during 2017 came from students who were in the process of lodging a complaint in relation to an examination. The vast majority (81%) of these inquiries concerned written examinations. At the same time a number of examples can be found of how the procedure for handling complaints (as provided for in the examination order) involves students having to find extra motivation in addition to their studies if they are to endure a complaints process that takes more than half a year.

These observations are the basis for the recommendation that the academic year 2018-2019 should see the launch of multiple initiatives with regard to feedback for students in connection with written examinations. There also needs to be a closer consideration of how examination complaints are processed across the entire organisation.

Exhausting procedure for examination complaints

The table below outlines the process a student needs to follow when complaining about her or his examination with a view to possible re-assessment or a re-exam.

It is not unusual that the processing of the student's complaint and any subsequent appeal can take three or four months. The entire process below including any complaints about legal issues take a minimum of 4-7 months.

The duration of the procedure for case processing can be seen as particularly problematic in cases where a student has not passed her or his examination and needs to make a decision during the complaints procedure about whether she or he will enrol for re-examination during the same exam session, such as if (and often when) the re-examination assessors are the same as for the original exam.

I was given insight into full complaint procedures of this nature on a handful of occasions during 2017.

If the student's legal complaint is not upheld, the case can also be escalated to the Agency for Science and Higher Education. In the cases in which I had insight during 2017, where it seemed to me that a complaint to the agency about legality issues would have been pertinent, the students chose not to lodge a complaint with the agency, because they were too exhausted by the complaints process up to this point.

The procedural description below takes as its starting point the detailed complaints framework as outlined in the examination order.  

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9 Examination Order, chapter 7
<table>
<thead>
<tr>
<th>Processual component</th>
<th>Estimated time</th>
<th>Description of processual component</th>
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</thead>
<tbody>
<tr>
<td>Complaints about examinations</td>
<td>This part of the case processing procedure takes at best 4-6 weeks.</td>
<td>When the university receives a complaint about an examination, the complaint must be presented to the examiner and censor so they can add their own comments. The faculty will then reach a decision about whether the student should be offered reassessment, offered re-exam or if the student’s complaint is not upheld. Re-assessment and re-exam must always involve new assessors.</td>
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<tr>
<td>Examination complaints appeals</td>
<td>This part of the case processing procedure also takes 4-6 weeks at best, if the faculty has a fixed board of appeal. If the board of appeal has to be set up for the occasion, it is not unusual that case processing time is extended by an additional month or more because of the practical difficulties that are involved in the selection of a board of appeal.</td>
<td>If the student’s complaint is not upheld and the student in this context believes (inter alia) that the examiner’s and censor’s comments are not sufficiently clear about why the student was awarded a lower grade than the grade that the student believes could be supported by the student’s own argumentation (on the basis of the course’s learning objectives in comparison with the grading scale order), the student has the option of lodging an appeal against the faculty’s decision. When the faculty receives an appeal against an examination complaint ruling, the faculty must set up a board of appeal. The board of appeal shall consist of two external censors, a member of teaching staff who is authorised to determine the nature of the examination and a student from within the discipline. The appeals committee shall rule on whether the students should be offered reassessment, offered re-exam or if the student’s complaint should not be upheld, as shall the faculty, see above. The offer of re-assessment or re-exam must also in this context always include evaluation by new assessors.</td>
</tr>
<tr>
<td>Complaints about legal issues</td>
<td>Currently, legal complaints are normally processed within 1-3 months at various levels of the organisation.</td>
<td>If the student’s appeal is not upheld, the student can lodge a complaint about the so-called legal issues, e.g. if the student can argue that the complaint or the appeal has been processed on an incorrect or incomplete basis.</td>
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Rejection of complaints about examinations

In a number of complaints about examinations into which we have received insight, it also seems that the argumentation in examiners' and censors' comments about students' complaints appears not to be supported by specific academic arguments for why the student's grade is justified and why the student should therefore not be given the opportunity of a re-assessment or re-exam. In more simple terms, we see that many assessor comments can be summarised as: "You should not be awarded a higher grade because we say that you should not have a higher grade".

In these same complaints it can be seen that the faculty decides not to pursue the complaint as it gives assessors’ comments a heavier weighting in the decision than the student’s argumentation.

The executive order on examinations states that: "The university bases its decision […] on the basis of the assessors’ statement and the complainant’s comments to the statement." (Article 35, section 3).

The organisation's written follow-up to the Student Ambassador's Annual Report for 2016 (6 April 2017) states that the university has clarified with the Danish Agency for Science and Higher Education that it is legally acceptable to weight assessors' comments higher in connection with the faculty's and the appeals board's processing of a student's complaint about her or his examination.

That this practice appears to result in unsubstantiated argumentation in assessors’ comments being used as a justification for rejection by both faculties and appeals boards when a student asks for reassessment or a re-exam with new assessors, seems to override the student's legal entitlement to adequate reasoning for the rejection of her or his complaint.

This also stands in contrast to the fact that student guidelines on several faculty course pages contain text stating that the faculty may refuse to accept a student complaint over an examination, if it is unfounded, insufficiently reasoned or has insufficient academic justification.

For academic year 2018-2019, the establishment of a clearer, cross-organisational overview of how widespread this practice is, is therefore recommended to serve as the basis for further discussion of this practice. The student ambassador will be happy to take part in the establishment of the overview as well as the discussions.

On the basis of chapter 3.3.1 it is recommended that the University's practice in processing complaints about examinations be further examined in the academic year 2018-2019 (eg in discussions of assessors' arguments in their comments, discussions of faculties’ reasons, discussion of statistics on exam complaints etc.).
3.3.2 Sufficient disclosure of the student's situation

In many of the exemption cases, cases involving disenrolment etc. that I see, I experience that the student's case could have been more fully clarified. In a number of cases, I also see that students who re-submit an application for exemption in which they include a more detailed description of events etc., often have their rejected application for exemption overruled on the basis of their application.

Unfortunately I am also seeing that the study boards, exemptions committees etc. are basing (for example) a rejection of the first or second application from a student to be allowed more than three examination attempts (thus leading to the student's disenrolment from the course) on a basis which could have been significantly better qualified. This can be seen, for example, in cases where the student's overall course of study and personal situation could be said to involve sufficient special circumstances as to grant an exemption when compared with other students.

This appears, for example, to lead to a disproportionately intrusive and irrevocable penalty, where we have observed in certain disenrolment cases that an examination attempt is considered as having been used because a medical certificate was not submitted on time, when a subsequent medical certificate clearly demonstrates that the student could not have been present due to some very specific physical or mental reasons.

We see that the basis for sufficient information about the student's case could, for example, have been retrieved from records about the student that are already available in the university's course administration systems, examination systems and learning systems, that could be used in conjunction with journalised case files about the student's sickness reports and other communications within the context of more serious illness, statements from examination observers etc. We also see that more could have been done to ask the student to summarily describe and document as specifically as possible all events endured by the student that led to the student needing to apply for an exemption.

The responsibility to provide adequate information about a case is a responsibility for both students and the administration. We therefore recommend that the above route is followed with a view to working to ensure that a student's situation is sufficiently informed before a decision is taken.

On the basis of chapter 3.3.2 it is recommended that relevant sections of the University's administration discuss actions to be taken in the academic year 2018-2019 that further clarifies the processes surrounding student submission of credit transfer applications, exemption applications and complaints.
### 3.3.3 Refusals for students with disabilities

None of the rulings on full or partial rejection of an application by a disabled student that I have seen in 2017 from the study boards or study administration units contain information that indicates that a consideration of the act on the prevention of discrimination was part of the decision. Unfortunately, most justifications in these rejections also indicate that this has probably not been the case.

It is therefore recommended that all study boards, the exemption committees, relevant study administration units etc. include the paragraphs in the act on the prevention of discrimination in their processing of relevant decisions concerning students with disabilities (and other students whose study situations are encompassed by the provisions of the act on the prevention of discrimination) and that study boards etc. clearly state in the justification for the decision, how the rules have been complied with (e.g. in decisions taken on the basis of article 7 of the Examination Order on special test conditions). It can be derived from the central paragraphs of the act on the prevention of discrimination that:

1. All operators of educational establishments are forbidden to discriminate.  
   (derived from Article 3, section 2)

2. A public education operator must undertake measures that are appropriate in view of the specific needs in order to give a person with disabilities access to education so that an employer may take measures to allow a person with disabilities access to employment, to exercise employment and to progress in her or his employment. (derived from Article 2a)

3. There must be no direct or indirect discrimination (through a provision, criterion or practice that is apparently neutral). (derived from Article 1, sections 2 and 3)

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<th>The Act on the Prevention of Discrimination</th>
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<tr>
<td><strong>Article 1, Section 2</strong></td>
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<tr>
<td><strong>Article 2a</strong></td>
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<td><strong>Article 1, Section 3</strong></td>
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<tr>
<td><strong>Article 3</strong></td>
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<td><strong>Article 3, Section 2</strong></td>
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On the basis of chapter 3.3.3 it is recommended that in the academic year 2018-2019, relevant forums and administrative units follow up on the study boards' implementation of the university's guidelines on how applications from students with disabilities are processed.
3.4 Evaluation and revised rules of procedure

In the spring of 2017, an evaluation of the Student Ambassador was conducted by an evaluation team set up by the Board. The work of the evaluation team resulted in a report containing proposals for amendments to the rules of procedure for the student ambassador function.

In light of the team’s report, the Board decided at their meeting in October to change the rules of procedure in the following areas:

- It has now become possible for the student ambassador to “participate in meetings between students and the administration as a neutral third party with a right to be heard”. The reasons for adding this competency are to “ensure that information from the administration is correctly understood by the students” and to gather “experience for her/his ongoing general guidance and advisory service”.

In this regard, the evaluation team’s report also stated that: “The Student Ambassador may not participate in meetings in a capacity as a representative of the student party. It should be stressed that the option to bring in the student ambassador as a neutral third party at meetings does not change students’ ability to also bring an observer/party representative.”

- The Student Ambassador will be appointed and terminated by an appointment committee set up by the rector, with the university’s director as president. Previously, the student ambassador was recruited and terminated by UCPH’s Board.

- It has also been clarified in the new rules of procedure that the student ambassador refers to the university’s director. However, the Student Ambassador still continues to be independent of the Board, the rector and the administration in relation to the exercise of the office.

The Student Ambassador function is described in the UCPH’s statutes and this therefore also has been amended. The board treated all amendments to the UCPH’s statutes on 11 December and the amended statutes where subsequently approved of by the Ministry.

On the basis of chapter 3.4 it is recommended that relevant forums and the student ambassador in connection with the discussion of this annual report, also discuss the implementation of the new provision in the Rules of Procedure that the student ambassador may participate as a “neutral third party with the right to be heard” at meetings between students and the university.

10 Article 5, Section 4 of the rules of procedure
11 Report by the evaluation committee, March 2017 p.20
3.5 The University of Copenhagen’s strategy 2023
The recommendations in this annual report can be used as starting points for the management’s objectives under these two focus areas in UCPH’s Strategy 2023 and six of the underlying points:

One unified and focused university

- Strengthen management and staff development across the University
- Further develop forms of collaboration that support the involvement and co-determination of students and staff
- Increase our focus on equality and diversity
- Support that administrative and organisational changes can be implemented as smoothly as possible
- Optimise digital support for research, education, administration and services in order to improve the user experience and create greater cohesion

Collaboration and societal commitment – nationally and globally

- Strengthen students’ opportunities to obtain an interdisciplinary skills profile by removing structural barriers and increasing interdisciplinary collaboration on education

Based on Chapter 3.5, it is recommended that this annual report causes relevant management units to consider setting targets under Strategy 2023 on strengthening student legal certainty as well as strengthening dialogue with and understanding of the students. It is also recommended that all ongoing and future efforts to increase the digitization of education, administration and service (e.g., digitization of cases etc.) put even more emphasis on whether students have sufficient access to communicating and documenting special situations.
3.6 National and international awareness about the function

The University of Copenhagen’s continued work towards strengthening its students’ legal rights also seems to be more and more relevant, both by comparison with a growing national interest in broadening the student ambassador function to other educational institutions and in comparison with even more established frameworks for student ombudsmanship at universities and other higher education institutions in the Nordic region, Europe, USA, Canada, South America and Australia. These insights from 2017 show that students’ legal rights are also strengthened by communicating about the ambassador function and by prioritising time for outward-facing activities.

The most significant features in 2017, both internationally and nationally have been:

- **Declaration concerning Ombudsman in higher education for the EU**: At the annual conference of the European Network of Ombuds in Higher Education it was decided to send a statement to the EU ministerial meeting and Bologna Forum 2018 in Paris with proposals that the “ombudsman in higher education” function should be introduced to EU member states’ higher education legislation.

- **Report about the student ombuds function in the Nordic countries, Europe, USA, Canada, South America and Australia**: At the same conference, Rob Behrens (the president of the network) presented the report “Being an Ombudsman in Higher Education”. Rob Behrens is the current UK Parliamentary and Health Service Ombudsman for England and Wales and is a former ombudsman in higher education. In his report, he discusses issues such as the importance of students’ involvement in connection with the dissemination of the ombuds function on higher education courses around the world, as well as the advantages and disadvantages of the known types of organisation of the ombuds function. The report is based on a 2015 questionnaire survey of all the network’s members and a number of detailed interviews conducted during 2016.

- **Proposed legislation on student ombudsmanship in Norway**: Over the course of the year, Norway’s parliament (Stortinget) has approved the initial legal proposal for the incorporation of student ombuds into national educational legislation. Most Norwegian higher educational institutions already have student ombuds.

  Norway’s first student ombuds was established at the University of Oslo in 2013.

- **National interest in the function**: Autumn saw the following direct requests for knowledge about the work of the student ambassador’s work from:
  - The Students’ Accreditation Council (STAR)
  - DM Students’ board
  - The UC Student Forum (nationwide association for the approximately 70,000 students attending university colleges, which was established in 2016)
  - The Student Council at Roskilde University
“We have no special friendships, but we are friendly to all.”

As stated at the European Network for Ombuds in Higher Education (ENOHE) Conference 2017