



20
years
ENQA.

Advancing quality
in European higher
education: celebrating
20 years of ENQA



Co-funded by the
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ISBN 978-952-5539-94-3

ISBN 978-952-5539-95-0 (web publication)

ISSN 1458-1051

This publication can be downloaded from the ENQA website at

<https://enqa.eu/index.php/publications/papers-reports/occasional-papers/>

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Graphic design by: Two of a kind

Edited by: Maria Kelo, Anna Gover and Anthony Jasper

Brussels, Belgium, 2020



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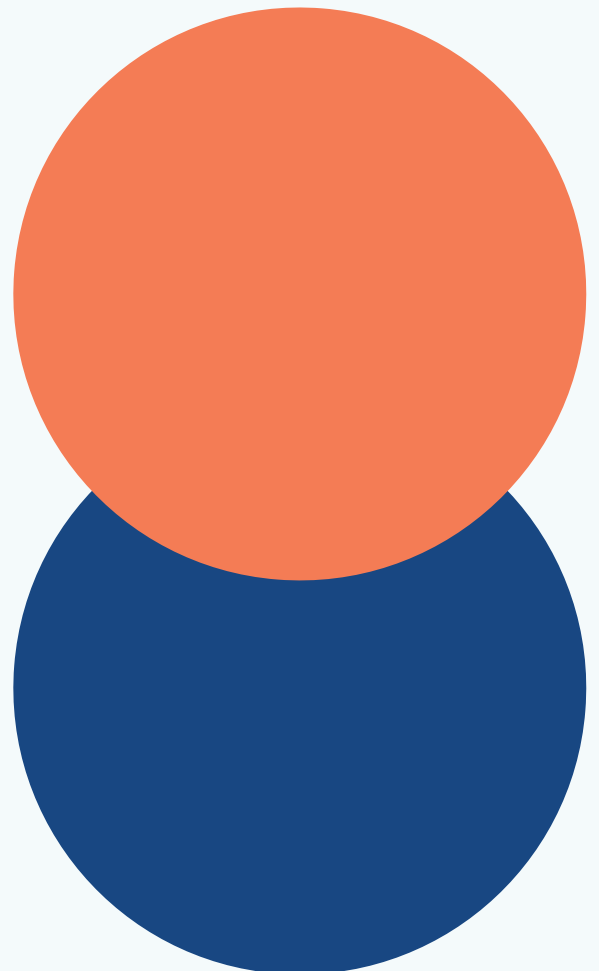
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Foreword

CHRISTOPH GROLIMUND
President, ENQA



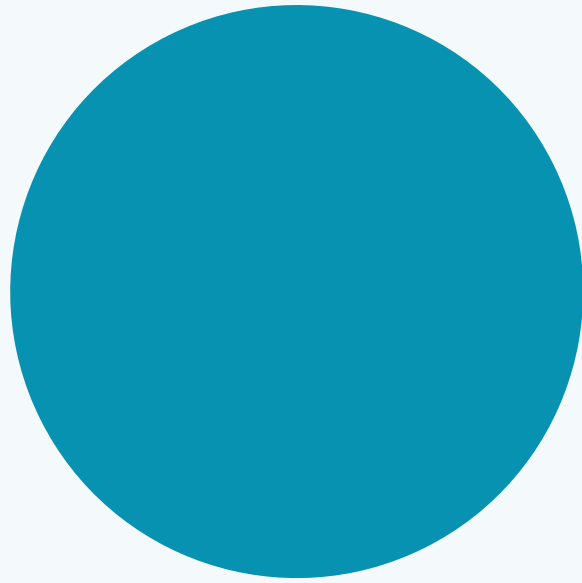
Dear Reader,

The articles written for this publication in honour of ENQA's 20th anniversary communicate a strong message: the quality assurance framework built on the Standards and Guidelines for Quality Assurance in the European Higher Education Area and implemented by ENQA's members is a story of success! A stakeholder organisation such as ENQA rests on two pillars: firstly, the strong and efficient management by a politically savvy director and a motivated secretariat. And secondly, the committed engagement of its members. In the end, it is the people, the leadership and staff of the quality assurance agencies, who define the association and who provide the potential to create, implement and innovate quality assurance frameworks. The articles collected in this publication, written by people formerly and currently active in ENQA, convey another strong message: ENQA certainly benefits from all of these!

Happy Birthday, ENQA!

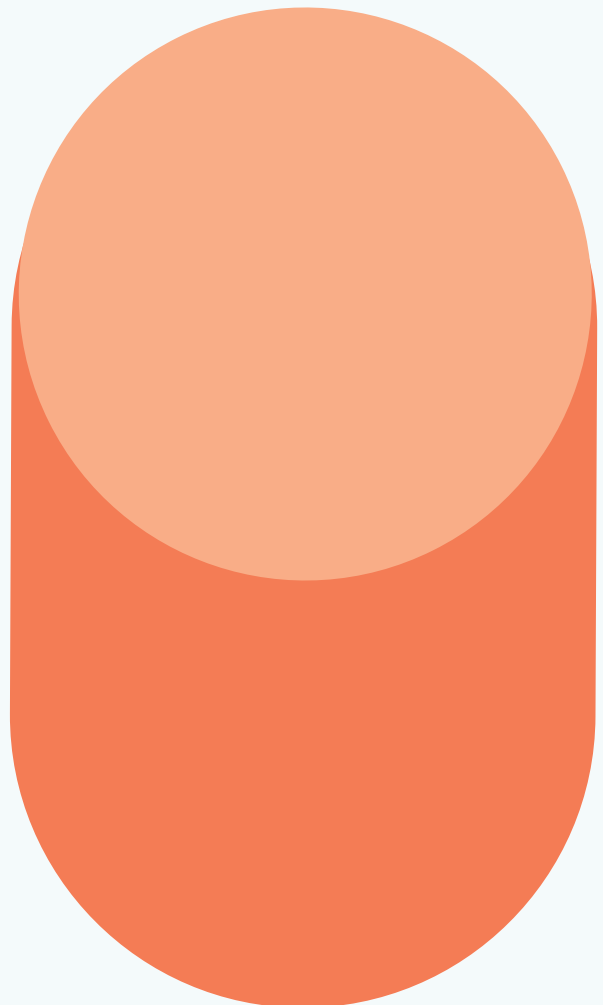
Christoph Grolimund
President





Introduction

MARIA KELO
Director, ENQA



2020 – ENQA's 20th anniversary! A year of celebrations. Participating in events all over Europe showcasing ENQA's current initiatives and the work done by European quality assurance agencies. Demonstrating our impact on the development of external quality assurance in the European Higher Education Area (EHEA) and beyond. Working together with our stakeholders to take quality assurance forward in the next decade. Contributing to policy discussions at the EHEA Ministerial Conference. Those were the plans, but this has not been the anniversary year we had imagined. Like many other important celebrations, ours have had to adjust to the current global situation. And so the focal point of the year has not been a large international conference in some nice city we have never been to before, but a Zoom call with a smaller audience to discuss how to continue ensuring quality in times of crisis and amidst persisting restrictions affecting all aspects of life. Indeed, instead of resting on our laurels, we have all had to roll our sleeves and address the challenges faced by the activities of ENQA members and of the Secretariat, giving priority to supporting those who depend on us.

While the celebrations will have to wait, this publication offers an opportunity to pause for a moment and reflect on the work done by ENQA in the past 20 years.

ENQA in the EHEA

20 years is a short time in terms of world history, and even in personal terms. Some of us may have married, had their first child, graduated, moved to a new country, or started their job 20 years ago. And it might seem like yesterday! But 20 years is quite a long time in the framework of the Bologna Process. Indeed, it covers almost its entirety, and it is fair to say that ENQA has grown hand in hand with it, in a mutually beneficial relation, where quality assurance developments have provided support to other higher education reforms (recognition, qualifications frameworks, ECTS, implementation of student-centred learning, etc.), and where the Bologna Process priorities have contributed to shaping how quality assurance has moved forward.

From this perspective, the speed, depth and breadth of developments have been remarkable. Things that were heatedly debated and anything but mainstream 20, 15 or even just 10 years ago, are now considered as well established basic characteristics of European quality assurance systems (despite not yet being fully implemented all across the EHEA): the independence of agencies; the primary responsibility of institutions for quality and quality assurance; the dual purpose of accountability and enhancement; the transparency of quality assurance results, including the publication of reports; and the role of stakeholders, in particular of students, in these processes; to name just a few.


It was clear from the outset that enhanced European cooperation in higher education, including student mobility, recognition, and a harmonised structural reform processes needed to be based on solid trust in each other's systems. It was similarly clear that this trust could only be fully achieved through a better understanding of the different approaches to quality assurance across the EHEA, and, most of all, by a concrete and widely accepted common framework. It is particularly for the creation and consolidation of that common framework that ENQA has worked hard with its members, as well as with other key higher education stakeholders, over the past two decades. The E4 Group, which in addition to ENQA includes EUA (the European University Association), EURASHE (the European Association of Institutions in Higher Education) and ESU (the European Students' Union), was given the mandate in the 2003 Berlin Communiqué to draft a set of common quality assurance criteria, which were then adopted as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG) at the Bergen Ministerial Conference in 2005. In the same year, the E4 Group were mandated to prepare a proposal for a European register of agencies. This resulted in the establishment of EQAR in 2008, with the four organisations of the E4 Group as founding members. Since then, the ESG have become the backbone of quality assurance in Europe, both for institutions and for agencies.

A growing and engaged membership

Already in the early days of the Association, ENQA's members discussed the need for agencies to "taste their own medicine". And they have truly done that. All ENQA's members undergo an independent external review every five years, to demonstrate that they operate in line with the ESG. This is usually done through the ENQA Agency Review process, which has developed into a professional review service since 2011. Today (October 2020) ENQA proudly counts 55 members in 31 countries of the EHEA, and the work to support other agencies to achieve that status soon is ongoing.¹ Counting also ENQA's 57 affiliate organisations, ENQA covers 44 out of the 48 EHEA countries, and reaches far beyond, to the Middle East, Asia, and the Americas. Not bad!

Over the years, ENQA has been privileged to benefit from not only highly professional staff, but, importantly, a very engaged membership. ENQA's members have demonstrated great loyalty to their Association and its community, openly sharing good practice, supporting each other, and investing time and effort in developing

¹ In particular this is being supported through our new project SE-QA-ESG, which supports agencies in Albania, the Czech Republic, Malta, Moldova, Montenegro, and Slovakia in the process of implementing the ESG in their national systems.



It is particularly for the creation and consolidation of that common framework that ENQA has worked hard with its members ●

ENQA further. ENQA's strength truly lies with its dedicated members, to whom go tremendous gratitude for ENQA's growth and success over the past two decades. Particular thanks are due to every past and present ENQA Board member and most of all to the three wonderful Presidents who have led ENQA since its relocation to Brussels in 2011: Achim Hopbach, Padraig Walsh, and Christoph Grolimund. Their vision and leadership have enabled ENQA to move ahead and evolve to what it is today.

Looking forward

The experiences of recent months have forced the quality assurance community – with agencies on the front line – to think and re-think the ways in which quality assurance is carried out. When travelling can resume, we will surely be taking planes and trains again and will thoroughly enjoy the possibilities of physical meetings in the international context. At the same time, the lessons learnt this year may help us all to consider better, more efficient, effective and environmentally sustainable models for quality assurance and international cooperation for the future which can combine the best of both worlds: the digital and the physical. The developments in the future are naturally not on a result of the pandemic, but cover a range of other changes, which have gradually become more and more important in the world of higher education such as flexible learning, digitalisation, and the social dimension of higher education, just to name a few. It will be exciting to work together to develop and test new approaches to quality assurance to better respond to the needs of the higher education sector in Europe in the next decade.

This anniversary publication is a rich collection of articles written by ENQA's members and affiliates, as well as some of ENQA's past Presidents. The articles cover a range of issues, moving from overarching topics related to European quality assurance and ENQA's role in its development, to experiences from quality assurance agencies in becoming and being ENQA members, and further to specific models for, or elements of, quality assurance. Several articles reflect not only on ENQA's past and present but also provide some insights and suggestions regarding the future direction that external quality assurance could take, and how ENQA could play a role in those developments. And as is very fitting for the times in which we are living, several of the articles consider the impact of digitalisation on higher education and its quality assurance, and on the future of quality assurance post-pandemic. Moving from macro to micro topics, the articles remind us of what we have in common and what unites us all, while they also highlight the richness brought about by the great diversity of our members and their national systems. With warm thanks to all the agencies and individuals who have contributed to this collection, I wish you good reading.



ENQA by numbers

PADRAIG WALSH

Chief Executive, Quality and Qualifications
Ireland (QQI), Ireland and Former ENQA
President (2013-17)

ENQA was first established as the European Network for Quality Assurance in Higher Education in 2000 to promote European cooperation in the field of quality assurance in higher education. In 2004 it became the European Association for Quality Assurance in Higher Education (ENQA).

In the Berlin Communiqué of September 2003, the Ministers of the Bologna Process signatory states invited ENQA “through its members, in cooperation with the EUA, EURASHE, and ESIB”, to develop “an agreed set of standards, procedures and guidelines on quality assurance” and to “explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Bologna Follow-Up Group to Ministers in 2005” (Berlin Communiqué, 2003).

The *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (which came to be termed the ESG 2005) were agreed by the ministers with responsibility for higher education at the Ministerial Meeting in Bergen, Norway in May 2005 (ENQA, 2009). As part of the preamble to the three part standards that were adopted at that meeting, the ESG noted that “the EHEA with its 40 states is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality, standards and quality assurance in higher education inappropriate.” (ENQA, 2009)

The above statement foresaw that there was never likely to be a single type of quality assurance agency or quality assurance regime in place in the members states of the European Higher Education Area (EHEA). This article details how this prophecy has indeed come to pass.

Expansion of the EHEA and the development of ENQA

If we can look at the changes that have taken place in the EHEA since 2005, we can see that it has expanded from the 40 states that signed up to ESG 2005 to 48 countries and is now comprised of all 47 members states of the Council of Europe (CoE) plus the Holy See (Vatican City – which itself has observer status in the CoE).

Insofar as ENQA is concerned, since its beginnings as a network of external quality assurance agencies for higher education in 2000, the network has sought to be as representative of the EHEA as possible. This took fuller expression in the *ENQA Strategic Plan 2016-2020* which set as one of its goals that “ENQA is representative of the diversity of quality assurance agencies throughout Europe” (ENQA, 2015). As ENQA reaches its 20th anniversary, how well has that goal been achieved?

As of June 2020, ENQA has 55 member agencies representing 31 of the 48 EHEA member states. In addition, a further 14 member states have entities that are affiliates of ENQA. There are currently only three EHEA member states (Belarus, Liechtenstein, and Slovakia) that have neither a member agency nor affiliate entity within ENQA. When we consider that the EHEA contains a number of small states with populations of less than one million people (Cyprus, Luxembourg and Malta) and micro-states with populations of less than 100,000 (Andorra, Liechtenstein and the Holy See), ENQA on its 20th anniversary can truly be said to be close to achieving its goal of being representative of the diversity of quality assurance agencies in Europe.

The progress has not been inexorable. Some member states that once had agencies as ENQA members no longer do so in 2020, including the Czech Republic, Serbia, Slovakia and Sweden. However, in the case of the Czech Republic, Serbia and Sweden, there are national agencies that are currently ENQA affiliates and the Swedish and Serbian national agencies are currently undergoing reviews to become members of ENQA again.

ENQA AND EQAR

The ESG 2005 envisaged the concept of a list or register of quality assurance agencies. This eventually became the European Register for Quality Assurance in Higher Education (EQAR), which was founded in 2008. The existence of ENQA and EQAR has been somewhat confusing for observers although the quality assurance community itself has largely been able to differ between a body that is primarily a membership association (ENQA) and a body that maintains a register of agencies that have been evaluated against the prevailing version of the ESG (EQAR).

Over time, the map of agencies that are members of ENQA and those that are listed on EQAR has become more overlapping, so that in June 2020, 48 of the 55 ENQA member agencies are also listed on EQAR with only one specialist agency (MusiQuE) being listed on EQAR while not simultaneously being an ENQA member.

Characteristics of ENQA’s members

AGENCY LONGEVITY

How many agencies that were in existence when ENQA was founded in 2000 are still in place at the time of its 20th anniversary? With their founding title, the list comprises CTI in France (established in 1934,¹ though it did not

¹ All dates of agency foundation and ENQA membership are taken from the membership section of the ENQA website <https://enqa.eu/index.php/enqa-agencies/members/full-members/>. A list of the agencies and acronyms mentioned in this article is presented in the appendix.

become an ENQA member until 2005); FIBAA (founded 1994, ENQA member since 2001), ZEVA (founded 1994, ENQA member since 2000), ASIIN (founded 1999, ENQA member since 2007) all from Germany; the pan-European body IEP (founded 1994, ENQA member since 2000); NOKUT (founded 1998, ENQA member since 2000) in Norway; AQU Catalunya (founded 1996, ENQA member since 2000) and AAC-DEVA (founded 1998, ENQA member since 2000) both from Spain and QAA (founded 1997, ENQA member since 2000) in the UK. HAC in Hungary was established in 1993 (although it did not become an ENQA member until 2002); SKVC in Lithuania dates its origin to 1995 (although it did not become an ENQA member until 2012); and NAA in Russia was set up in 1995 (but did not become an ENQA member until 2009). BAC and RCVS date themselves back to 1984 and 1844, although they did not become members of ENQA until 2015 and 2018 respectively. NEEA in Bulgaria dates its origin to 1996 (although it did not become an ENQA member until 2008). The pan-European association EAEVE was founded in 1988 (and became an ENQA member in 2018).

The short list of ENQA members in place in 2000 that are still in place in 2020 under the same (root) name is therefore AAC-DEVA, AQU Catalunya, IEP, NOKUT and QAA. For posterity, membership of the original ENQA Steering Committee (the forerunner to the current ENQA Board) contained, among others, members from QAA and NOKUT when it first met in Brussels in March 2000.

Another agency that is still with us is the Danish Evaluation Institute - EVA that supplied ENQA with its first Chairman, Christian Thune, but is no longer an ENQA member as its remit does not now include higher education. Other pre-2000 agencies that exist in a different form today are the Finnish national agency FINEEC, which started its life as FINHEEC in 1996 but now has responsibility for general as well as higher education. The French national agency began life as CNE in 1985 before becoming AERES and finally HCERES, as the remit of the agency changed to encompass evaluation of research and well as teaching.

DECISION-MAKING POWERS

Many national agencies not only organise the evaluation of institutions and/or programmes but also take the decision to accredit the institution or programme through their own governance system. There are, however, some national systems where agencies are commissioned to organise reviews but where the formal decision is taken by another entity. This is the case in Switzerland where AAQ conducts reviews but where the decisions on accreditation are taken by the Swiss Accreditation Council. Denmark used to operate a similar system with ACE Denmark organising evaluations and the decisions being taken by an Accreditation Council. This

has now been replaced with a unitary body called the Accreditation Institution. In the Netherlands, agencies such as QANU or NQA organise programme reviews but the decisions are taken by NVAO, which also runs evaluations for the audit of institutions.

AGENCY DIVERSITY

When the ESG 2005 were adopted, the “typical” quality assurance agency was viewed as being national in nature (usually established by national legislation), comprehensive in scope and confining its activities largely to external quality assurance procedures for programme or institutional evaluation in higher education. By 2020, it is hard to say if there is a “typical” quality assurance agency anymore. Just as in 2005, when “the EHEA with its 40 states is characterised by diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations” made “a single monolithic approach to quality, standards and quality assurance in higher education inappropriate” (ENQA, 2009), today there is no monolithic quality assurance agency at European or indeed national level.

In 2020, the 55 ENQA member agencies are diverse in their age, their geographic scope, their sector of higher education, their disciplinary scope, their decision-making powers and the locus of their quality assurance activities in higher education and many have also accrued functions beyond quality assurance and indeed beyond higher education. It is worthwhile exploring what the drivers of these changes have been. Many EHEA member states have binary or ternary higher education sectors – public and private institutions, universities (doctoral granting) and polytechnics/institutes of technology/universities of applied science. The differentiation in autonomy between the institutions characteristic of these sectors often meant that originally they had separate quality assurance agencies regulating or overseeing them. Over time and particularly with the adoption of a pan-European approach to quality assurance culminating in ESG 2005, the governments in some countries took the decision to amalgamate the functions of sectoral agencies into a single agency. This included Austria (where the three agencies with responsibilities for public universities (AQA), fachhochschule (FHR) and private universities (OAR) were amalgamated in 2012 to form AQ Austria); Belgian Flanders (where the agencies responsible for the quality assurance of the university (VLIHR) and polytechnic sector (VLHORA) were amalgamated in 2013 to form VLUHR QA) and Ireland (where the agencies responsible for the university sector (IUQB) and for the institutes of technology and private colleges sectors (HETAC) were amalgamated in 2012 to form QQI). The relatively small size of Austria, Flanders and Ireland probably contributed to the establishment of

agencies forming a critical mass of staff and responsibilities through amalgamation.

Spain is probably a unique example of a country where agencies have developed at the regional level whereby there are now seven ENQA member agencies representing the autonomous regions of Andalusia, Aragon, the Basque region, Castilla y Leon, Catalonia, Galicia and Madrid in addition to the Spanish national agency ANECA that also oversees the autonomous regions in Spain that do not (as yet) have ENQA member or EQAR listed agencies.

A different situation has played out in German-speaking Europe where Austrian, German and Swiss-based agencies are part of a regulated market where recognised agencies can offer their services to higher education institutions in the three countries. In the case of Germany and Switzerland, the accreditation process is overseen by national market regulators in the form of Accreditation Councils. As higher education in Germany is regulated at Lander rather than Federal level, this regulated market has proven to be very stable over time with the seven agencies that were established between 1994 and 2002 still operating in 2020 (although recognition has also been granted to the Austrian and Swiss national agencies AQ Austria and AAQ).

The majority of ENQA member agencies are comprehensive in nature in that they are involved in evaluating all disciplines or that they evaluate all types of institutions. There are, however, a number of agencies that have chosen to offer their services to particular disciplines (for example FIBAA for Business, AHPGS for Health and Social Sciences, ASIIN for Engineering, Information Science, Natural Sciences and Mathematics, all operating out of Germany) or that were established to regulate at the disciplinary level (CTI for Engineering in France, RCVS for Veterinary Medicine in the UK). Other larger countries have spawned a mixture of agencies that are publicly or privately established such as in Kazakhstan (IAAR and IQAA) and the Russian Federation (AKKORK, NAA, NCPA).

In 2020, there are still a number of countries/regions where there is still only one prominent national agency with ENQA membership. This is the case for Armenia, Austria, the two main Belgian communities, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, Georgia, Greece, the Holy See, Hungary, Ireland, Italy, Latvia, Lithuania, Norway, Poland, Portugal, Romania, Slovenia, Switzerland and Turkey.

A further development since the establishment of the EHEA has been the expansion of the remit of national agencies to areas outside of the quality assurance of higher education. With the development of national qualifications frameworks and qualifications recognition

It is hard to say if there is a “typical” quality assurance agency

as part of the Bologna Process, some national agencies have been given responsibility for these functions. As the distinction has also become more blurred between vocational education and training (VET) and higher education, some agencies also have responsibility for the quality assurance of VET.

For example, the Norwegian agency NOKUT, in addition to its responsibility for the quality assurance of higher education, is also responsible for the quality assurance of VET and for the Norwegian national academic recognition and information centre (NARIC). The Armenian agency ANQA also has responsibility for other tertiary education institutions and the Estonian agency EKKA also oversees VET. In the UK, BAC chooses to engage with institutions in further (another name for vocational) and higher education. Meanwhile in Ireland, QQI is not only responsible for the quality assurance of all higher education, public and private, but also acts as NARIC Ireland and is responsible for the national qualifications framework and for the quality assurance and certification of Further Education and Training, including (from 2019) English Language Education. NCEQE in Georgia not only conducts institutional and programme accreditation but also acts as the Georgian NARIC and is responsible for its national qualifications framework. The expanded remits for these agencies provide them with a critical mass of staff as many of them are operating in relatively small countries.

In addition to agencies that predominantly operate nationally, ENQA also has as members such as the IEP and EAEVE that operate on a European scale and the agency from the Holy See (AVEPRO) that operates on a worldwide basis from Europe's smallest state!

Conclusion

Whoever surfaced the concept in 2005 that the EHEA with “its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations” would make “a single monolithic approach to quality, standards and quality assurance in higher education inappropriate” (ENQA, 2009) has certainly been proven correct in their assertion, as we come to ENQA’s 20th birthday celebrations.

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Appendix 1 – List of agencies and acronyms mentioned in this article

Country	Agency Acronym	Agency
Armenia	ANQA	The National Centre for Professional Education Quality Assurance
Austria	AQ Austria	Agency for Quality Assurance and Accreditation Austria
Austria	AQA (defunct)	Austrian Agency for Quality Assurance
Austria	FHR (defunct)	Fachhochschule Council
Austria	OAR (defunct)	Austrian Accreditation Council
Belgium (Flanders)	VLIR (defunct)	Flemish Interuniversity Council
Belgium (Flanders)	VLHORA (defunct)	Flemish Council of University Colleges
Belgium (Wallonia)	AEQES	Agency for Quality Assurance in Higher Education
Bulgaria	NEAA	National Evaluation and Accreditation Agency
Croatia	ASHE	Agency for Science and Higher Education
Denmark	ACE Denmark (defunct)	
Denmark	AI	Danish Accreditation Institution
Denmark	EVA	Danish Evaluation Institute
Estonia	EKKA	Estonian Quality Agency for Higher and Vocational Education
EUROPE	IEP	Institutional Evaluation Programme
EUROPE	EAEVE	European Association of Establishments for Veterinary Education
EUROPE	MusiQuE	Music Quality Enhancement
Finland	FINEEC	Finnish Education Evaluation Centre
France	AERES (defunct)	Evaluation Agency for Research and Higher Education

France	CNE (defunct)	National Committee of Evaluation
France	HCERES	High Council for the Evaluation of Research and Higher Education
France	CTI	Engineering Degree Commission
Georgia	NCEQE	National Centre for Educational Quality Enhancement
Germany	AHPGS	Accreditation Agency in Health and Social Sciences
Germany	ASIIN	Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics
Germany	FIBAA	Foundation for International Business Administration Accreditation
Germany	ZEVA	Central Evaluation and Accreditation Agency
Holy See	AVEPRO	Agency for the Evaluation and Promotion of Quality in Ecclesiastical Universities and Faculties
Hungary	HAC	Hungarian Accreditation Committee
Ireland	HETAC (defunct)	Higher Education and Training Awards Council
Ireland	IUQB (defunct)	Irish Universities Quality Board
Ireland	QQI	Quality and Qualifications Ireland
Kazakhstan	IQAA	Independent Kazakh Quality Assurance Agency for Education
Kazakhstan	IAAR	Independent Agency for Accreditation and Rating
Latvia	AIC	Academic Information Centre
Lithuania	SKVC	Centre for Quality Assessment in Higher Education
Netherlands	NQA	Netherlands Quality Assurance
Netherlands	QANU	Quality Assurance Netherlands Universities
Netherlands and Belgium (Flanders)	NVAO	Accreditation Organisation of the Netherlands and Flanders
Norway	NOKUT	Norwegian Agency for Quality Assurance in Education
Poland	PKA	Polish Accreditation Committee
Romania	ARACIS	Romanian Agency for Quality Assurance
Russia	AKKORK	Agency for Quality Assurance in Higher Education and Career Development
Russia	NAA	National Accreditation Agency of the Russian Federation
Russia	NCPA	National Centre for Public Accreditation
Spain	ANECA	National Agency for Quality Assessment and Accreditation of Spain
Spain (Andalusia)	AAC-DEVA	Andalusian Agency of Knowledge – Directorate for Evaluation and Accreditation
Spain (Aragon)	ACPUA	Aragon Agency for Quality Assessment and Strategic Foresight in Higher Education
Spain (Catalonia)	AQU	Catalan University Quality Assurance Agency
Switzerland	AAQ	Swiss Agency of Accreditation and Quality Assurance
United Kingdom	BAC	British Accreditation Council for Independent Further and Higher Education
United Kingdom	QAA	Quality Assurance Agency for Higher Education
United Kingdom	RCVS	Royal College of Veterinary Surgeons



**QAA's current & former ENQA
Board members reflect on**

ENQA's past and future

PETER WILLIAMS

FIONA CROZIER

ANTHONY MCCLARAN

DOUGLAS BLACKSTOCK

**interviewed by Luke Myer, Policy &
Public Affairs Officer, Quality Assurance
Agency (QAA), United Kingdom**

The UK's Quality Assurance Agency (QAA) has been active in the work of ENQA since the inception of the Association. To capture QAA's collective memory of the past 20 years in European quality assurance, QAA brought together its senior staff who have contributed to ENQA through twenty exciting yet challenging years: Peter Williams (ENQA Vice President 2004-2005 and President 2005-2008), Fiona Crozier (ENQA Board member 2008-2013 and Vice President 2009-2013), Anthony McClaran (2013-2015), and QAA's current Chief Executive Douglas Blackstock (2019-).



In ENQA's 10th Anniversary publication in 2010, Peter Williams reflected on his period as President, writing of the "long and winding road" which took ENQA from an informal discussion forum of quality enthusiasts into a professional, cross-European association, "offering its members shared experience and technical know-how" (ENQA, 2010). Today, another decade on, he reflects on the beginnings of ENQA.

***P. WILLIAMS:** "We all met from time to time, and slowly found out about each other's work. There was a sense that we were trying, as a group of professionals, to develop practice and ways of doing these things. At the same time, we all had our various masters telling us what they wanted to do. The two things didn't always gel."*

"And so it began with the European Pilot Project, which led to the creation of the network. And then out of the network came the association, ENQA itself. I was on the Steering Group from about 2000, and the real key was the 2003 Prague Declaration, which essentially generated a role within the Bologna follow-up structure for ENQA. It required it to turn itself into an association."

From QAA's perspective, it was important to have an international network to explore quality benchmarking. Since our formal establishment in 1997, we had been creating UK-wide benchmarks for quality and standards (the "Academic Infrastructure", now the UK Quality Code) and using them to support review methods tailored to the Scottish, Welsh and English and Northern Irish sectors.

***P. WILLIAMS:** "Within the UK, a lot of the work one had to do [was] explaining exactly what quality assurance was, and what it could be, and what it didn't have to be, and what the object of the exercise was, and so on."*

It was in this context that QAA participated in the development of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) in 2005. The development of the ESG marked a major advance in effecting the Bologna Process reforms. Significantly, they also represented a milestone in higher education partnership, the E4 Group, with ENQA representing quality assurance bodies, the European University Association (EUA) and European Association of Institutions in Higher Education (EURASHE) representing providers and the European Students' Union (ESU, then ESIB) representing students.

ENQA and the ESG

With their redevelopment in 2015, the ESG have contributed to a paradigm shift towards student-centred

learning and teaching in Europe. The work of the ENQA Board is critical in maintaining their highest standards of quality, while allowing the flexibility ENQA members require to meet the needs of their jurisdictions. QAA's current Chief Executive Douglas Blackstock considers how the ESG have become respected worldwide.

***D. BLACKSTOCK:** "The European Standards and Guidelines is a remarkable piece of work. To get 48 countries with divergent systems, cultures, and languages to agree on a common set of standards for higher education quality is a major achievement. It has now influenced developments in Africa and in the ASEAN region. Contrast that with the United States, which is one country with one national language, and has struggled with some of those aspects. I think it's really, really positive."*

When the ESG were developed, however, Peter recalls that there was no expectation of this scale of achievement.

***P. WILLIAMS:** "Perhaps the most significant continuing role is ENQA's role as the guardian of the Standards and Guidelines, which really do provide the bedrock on which the European approach can be continued. But at the time, we certainly hadn't expected it to take on the significance that it has. All we were doing was desperately trying to get something agreed! If you read it, the first version, it makes it clear it was really just a starting point."*

As Vice President, Peter led the working group on Sections 1 and 2 (focused on internal and external quality assurance), while Section 3 (focused on agencies) was overseen by Christian Thune (ENQA President 2000-2005). Peter describes how, with high pressure and a tight timescale, the working group used QAA's principles and practices to influence the work.

***P. WILLIAMS:** "With Christian and Seamus Puirseil, who was the head of the Irish agency at that time, we all put our heads together over Christmas 2004 and came up with a version. Time was running out – we had to get it all done by March 2005, in order for it to be approved by everybody and put to the ministers in Bergen."*

"In creating the Standards and Guidelines, especially the first two sections, there were huge difficulties... the whole thing turned into a power struggle between ENQA and the other three 'E's. They didn't think that ENQA should have been given the job at all, and believed that they should have been asked to do it, because they didn't want the agencies to have so much influence. It's all part of the history of ENQA. As far as QAA

was concerned, what I wanted to do was to offer to our European partners an approach which was in general similar to QAA's approach. It was not going to be a heavy-handed accreditation model."

In return, a range of ESG principles developed in other countries also enhanced elements of the work of QAA in parts of the UK; examples include student reviews, and student-centred learning. QAA was involved in the 2015 revisions, too, with Fiona Crozier chairing the MAP-ESG project group (2010-2012). The ESG illustrate the cyclical nature of quality assurance; recently, the ESG 2015 principles became the basis of QAA's new global accreditation mark.

D. BLACKSTOCK: *"We felt that it would be inappropriate for us to launch a review method in other countries based solely on UK standards; the European Standards and Guidelines is the benchmark. We built our international accreditation and capacity-building work with reference to the ESG."*

"Of course, the ESG will need to evolve. We are supportive of levels of reform, but in that evolution, you have to bring people with you as well. No individual country should dominate. Through the sharing of practice, experience and ideas, we can support innovation."

Formalisation and political impact

The ESG are not the only lasting impact. As ENQA shifted from a network to a formalised organisation, Fiona Crozier considers the political role the association has played.

F. CROZIER: *"It was really important for ENQA to move from being a network for chats and for members to get together, through to something that was a representative body, that could represent agencies and play its part within the E4 group."*

"We'd been through ten years of the Bologna Process, the introduction of the ESG, the introduction of EQAR, agency reviews. It was a really interesting time to be on the Board."

ENQA's Board itself has evolved significantly. Peter reflects that even in the days of ENQA being an informal body, the Board worked to present it with professionalism.

P. WILLIAMS: *"I was always deeply impressed by the quality of the people who were on the ENQA Board; the seriousness with which they took their*

responsibilities, the time they put into the work, and the effort they made. I think that that helped a lot to keep ENQA, in the eyes of the ministers, a professional organisation which was serious about what it was doing, and did it well."

While the Board members were experienced, however, they were also extremely busy. Perhaps by definition, Board members of international organisations also hold senior positions in their own countries. After ENQA became an association in 2004 as a result of the Bologna Process, the process of formalisation was necessary.

F. CROZIER: *"When I started on the Board, it had come through [a] transition, and it was in the process of really becoming a much more professional organisation. This was cemented by the fact that the organisation moved from Finland to Brussels."*

"That was a strategic move to bring ENQA into the heart of the EU. They could go for a coffee with people from the Commission, or the EUA. At the same time, we formalised the Board's strategic and annual planning processes, making them available for the approval of members at General Assemblies. Thirdly, we recruited Maria Kelo as Director, who's still in post today. Those three things on the operational and strategic side of things had transitioned."

This process of formalising the Secretariat is one which has proven impactful for QAA. Anthony McClaran discusses how ENQA's "strong and well-resourced Secretariat" and "high-calibre Director" brought benefits for QAA.

A. MCCLARAN: *"I think having that permanent secretariat, and the leadership that is provided by Maria, has been a really important factor in the development of ENQA. It enabled us as Board members to come to the Board, to have discussions, to set out lines of development or policy or decisions, et cetera, and know that there's a highly professional, competent secretariat which is going to take that forward... I think that that logistical challenge is inherent in international organisations, and I think the ENQA solution to it, particularly after the secretariat moved to Brussels, became particularly effective."*

In the 2010s, access to this formalised association helped QAA steer through domestic challenges.

F. CROZIER: *"Whilst we were transitioning with Presidents in ENQA, we were also transitioning with Chief Executives in QAA... I think both organisations transitioned in that period, for different reasons. They both were shaken up."*

A. MCCLARAN: “I took over just after the Select Committee report,¹ which had been very critical... It was a pretty threatening moment for the agency. We had a lot of work to do in order to re-establish that public and political confidence in the agency.”

“One of the real benefits of being in ENQA was that you could share problems with very well-informed, experienced colleagues, who, because of the great geographical breadth of ENQA, were all dealing with quality issues which were recognisable, but everyone was at a slightly different stage.”

D. BLACKSTOCK: “The positive endorsement of our ENQA review in 2018 was particularly important for QAA, because we were coming out of a period where there had been some doubt about our future. There had been some challenge to our future roles, and huge debate in the UK about what quality assurance should look like, and also huge debate about the future of the UK Quality Code and what it should look like.”

As higher education regulatory frameworks have deviated in England, Scotland, Wales and Northern Ireland, QAA’s role to maintain a coherent system of quality and standards has evolved.

A. MCCLARAN: “We were trying to administer a system of quality assurance over four increasingly disparate jurisdictions. I think membership of ENQA, and the dialogue that we had with ENQA, was helpful with calibrating those arguments.”

“In England, Scotland and Wales, you have three very different contexts. Most of the policy directions that you might encounter from a combination of those three countries would cover most points on the spectrum of where our colleagues in other countries were. There were interesting lessons from colleagues in Germany, for instance, because of the very heavily federal system in Germany.”

D. BLACKSTOCK: “In an essence, the UK is a microcosm of the European Higher Education Area... that diversity allows you to think about how you apply methods in the context of the diversity in your own system.”

ENQA’s spaces for collaboration and discussion have been particularly important for QAA.

D. BLACKSTOCK: “One of the things I’m particularly pleased about is ENQA continuing the work that I started on the Staff Development Group. I’m really happy about the Leadership Development Programme that was launched in 2018... Our participation in activities with other agencies develops the staff of QAA; it brings in learning about other practices, but it also develops the people.”

“One of the most significant periods of development in my time is when ENQA had a number of working groups around the work of agencies. The recent adoption of a new strategy and a new fee structure means it will need to have a very clear value proposition for members. It needs to be clear on its actual services to members if the Association is to continue to be successful.”

Challenges

It hasn’t all been plain sailing however, with each of QAA’s ENQA Board members identifying a similar challenge, the relationship between QAA and both ENQA and the European Quality Assurance Register (EQAR). QAA has undergone three successful ENQA reviews, in 2008, 2013 and 2018, but its views on EQAR have varied.

F. CROZIER: “There are lot of tensions between ENQA reviews as a membership criteria, and the Register... ENQA has traditionally taken a more developmental approach, and the Register has been much more of an accreditation/hard-line pass-or-fail model. The signs of that were there right back in 2008-9.”

Peter reflects how this difficulty initially made him sceptical of the idea of EQAR.

P. WILLIAMS: “My view was that ENQA was doing the job perfectly well; there was no need to have a separate accreditation agency duplicating its work, which was going to use the same criteria (the ESG) that ENQA was using for its membership reviews and also to rely on ENQA’s compliance reviews as the basis of its own judgements... I predicted the two bodies would start, slowly but surely, to interpret the Standards & Guidelines differently. To some extent that does seem to have happened.”

“A lot of people thought that ENQA was doomed, that EQAR would be too strong a competitor, that ENQA wouldn’t hold its membership, that its members would disappear, and then it would collapse. But it didn’t. ENQA has kept going, and it’s kept going for twenty years. It’s really quite remarkable. It’s obviously a strong organisation now, doing a useful job for the agencies and I think it probably

¹ See: House of Commons Innovation, Universities, Science and Skills Committee, 2009

has actually been strengthened by its association with EQAR. Being on EQAR is of practical value to European quality assurance agencies.”

Peter later served as Chair of the British Accreditation Council, which acquired EQAR registration. QAA, too, is now on the Register, having been admitted under Anthony in 2014.

A. MCCLARAN: *“I did understand why there had been tensions around the establishment of the Register. I certainly had a different view, and I think I was able to take a different view because things had moved on.”*

“In fact, I increasingly saw the roles of EQAR and ENQA as complementary rather than in opposition to each other... From my point of view, I thought it was important for QAA to be on the Register, because it was a mark of recognition.”

QAA’s most recent review confirmed both ENQA membership and EQAR listing until 2023. Today, it continues to view its inclusion as beneficial; EQAR provides important public recognition of its successful efforts to work to the highest possible standards, particularly in a shifting UK higher education setting.

D. BLACKSTOCK: *“I’m strongly in favour of having a proper register of legitimate agencies, and I think that’s really important – EQAR has a valuable function to perform. But they’re not the regulator of the agencies.”*

“I think you would find now that most agencies have raised concerns about the EQAR approach having a distorting effect on ENQA reviews. The reviews have become more about ticking the boxes, rather than development of quality assurance. Indeed, EQAR’s decision to develop an interpretation of the ESG, which is something that is shared across multiple partners and multiple countries, has caused some unnecessary friction.”

“ENQA’s recently made some quite important distinctions now, where it’s going to leave decisions about compliance with the ESG to EQAR, and decisions about membership to ENQA. That seems to have got a majority view, and is a sensible way to go. Having that official list of agencies is really important for giving a record of legitimacy - but there should be limits on this transfer of responsibility and the exercise of power.”

2020: the next decade and beyond

This year, quality assurance agencies have entered a new decade amid unprecedented disruption and uncertainty

resulting from the impact of the COVID-19 pandemic. ENQA’s role in offering a forum for agencies to share experiences and learn from each other has been critical, and will remain important in the years ahead.

D. BLACKSTOCK: *“ENQA has a really important convening power. It’s already demonstrated that by hosting a seminar for Chief Executives of all the agencies, or supporting the TeLSA project on online assessment, for example.² It’s acted as a repository for people to share information about how they’ve responded to the crisis. Today, it’s got a role to shape the conversation about how quality assurance moves beyond COVID-19.”*

“This is where the third strand of ENQA’s new strategy, on innovation, really comes in. What practices, processes and principles might we need to adopt in a world where things have changed? I’m definitely in the camp that higher education won’t just go back exactly to where it was before. Perhaps in some countries, but not everywhere. There’s a real opportunity for the delivery of higher education to change - to support personalised learning; to better support people with accessibility issues through digital delivery; to consider the environmental impact of quality assurance.”

“But as we look to what the future may hold, we take with us our reflections from the past two decades of European quality assurance. For QAA, ENQA remains a powerful community for improving the experience of the students in higher education across Europe.”

PETER WILLIAMS joined QAA in 1997 from its predecessor body, the Higher Education Quality Council. He was Chief Executive of QAA from 2001-2009, and served as Vice President and President of ENQA from 2005-8. He retired in 2009, but remains active in higher education advisory roles.

FIONA CROZIER was Assistant Director of QAA from 1998-2013, returning to be Head of International from 2015 to 2019. She served as ENQA Vice President from 2008-2013. She is now an independent consultant.

ANTHONY MCCLARAN was QAA Chief Executive from 2009-15, and served on ENQA’s Board from 2013-2015. He recently became Vice-Chancellor of St Mary’s University, after serving as Chief Executive of Australia’s higher education regulator, TEQSA.

DOUGLAS BLACKSTOCK joined QAA in 2002 and has been Chief Executive since 2015. He joined ENQA’s Board in 2019. He previously served as a member of ENQA’s Internal Quality Assurance Group and as Chair of the Staff Development Group

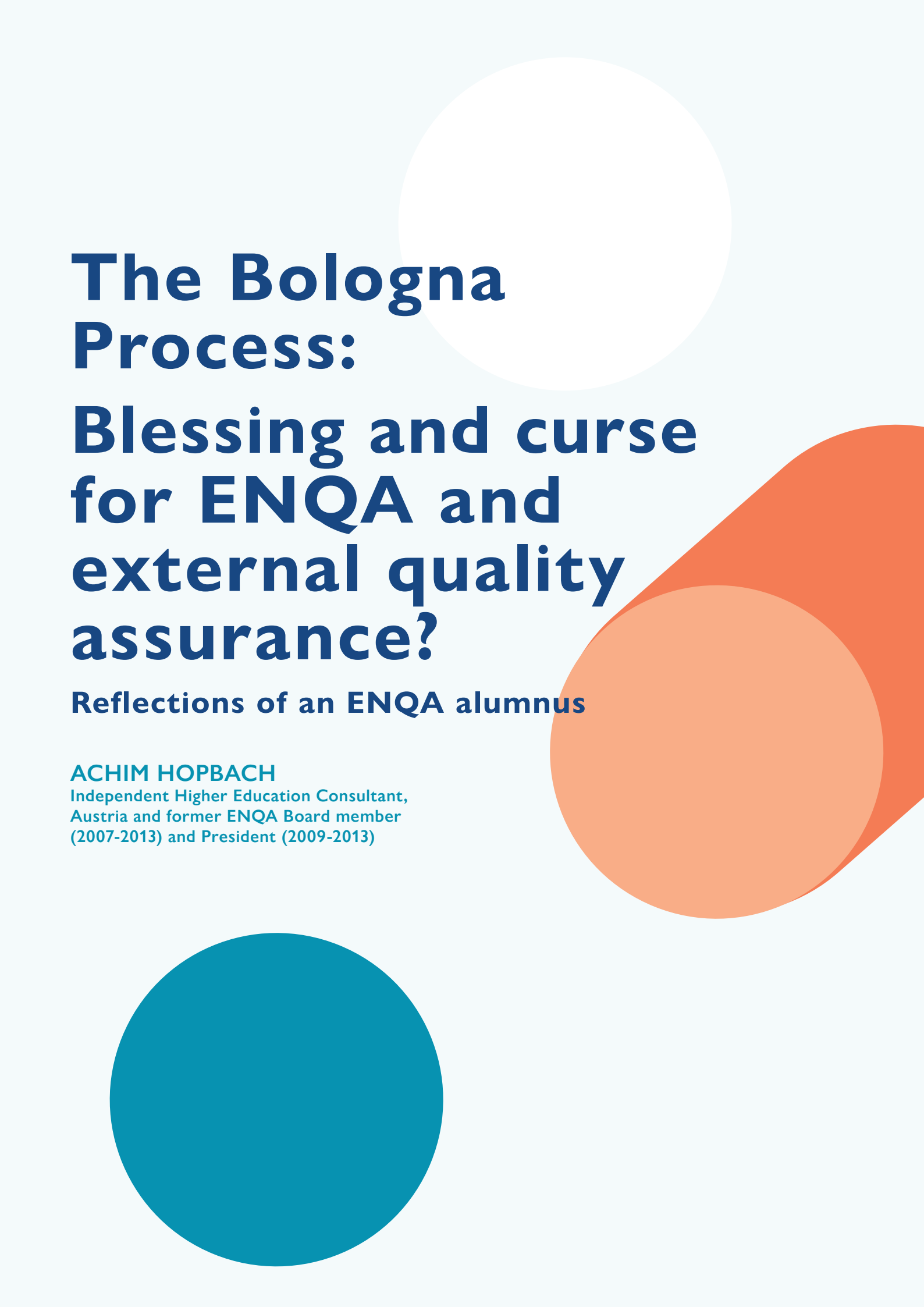
² See: TeLSA Project – Adaptive trust e-assessment system, 2020

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The Bologna Process: Blessing and curse for ENQA and external quality assurance?

Reflections of an ENQA alumnus

ACHIM HOPBACH

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Austria and former ENQA Board member
(2007-2013) and President (2009-2013)

“Since the founding of the association, the ministerial conferences of Prague (2001), Berlin (2003), Bergen (2005), London (2007), Leuven/Louvain-la-Neuve (2009) and Budapest and Vienna (2010) can be characterised as major milestones determining the direction of ENQA’s development until the current days. It became apparent that there is a demand for an actor in quality assurance that would systematically contribute to the formulation of European quality assurance procedures.” (Hopbach, 2010: 23)

These lines are quoted from the author’s concluding remarks in the publication marking the occasion of ENQA’s tenth anniversary. Another ten years later the author was invited to contribute reflections on the role of ENQA and of external quality assurance in the Bologna Process to ENQA’s next anniversary publication. In doing so the author will discuss why, on the one side the quote is still true and why, on the other side the Bologna Process might have been a “Blessing and a Curse for ENQA and External Quality Assurance” at the same time.

Quality assurance in the Bologna Process

Quality assurance is one of the key commitments in the Bologna Process and one of the pillars of the European Higher Education Area (EHEA). When discussing the role of external quality assurance in the Bologna Process two perspectives are to be adopted. Firstly, external quality assurance as commitment itself; secondly, external quality assurance and its relevance for the implementation of other Bologna commitments.

EXTERNAL QUALITY ASSURANCE AS COMMITMENT ITSELF

Without a doubt, a most significant step was taken at the ministerial conference in the year 2003. Whereas before, external quality assurance was addressed only by calling for international collaboration, in Berlin the ministers committed themselves to implement quality assurance systems that contain:

- “A definition of the responsibilities of the bodies and institutions involved.
- Evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results.
- A system of accreditation, certification or comparable procedures.
- International participation, co-operation and networking.” (ENQA, 2003: 3)

A side note: the fact that ministers committed themselves to implement such systems within two years is an indicator of the dynamism and momentum of the “early Bologna days”. But it was another decision that laid the foundations for the enormous relevance that quality assurance should attain in the emerging EHEA, namely the mandate given to ENQA to,

“through its members, in co-operation with the EUA, EURASHE and ESIB, to develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies.” (ibid.)

It is fair to say that two years later when – almost surprisingly, upon the first attempt – the *Standards and Guidelines for Quality Assurance in the EHEA* (ESG) were adopted, none of those involved in the drafting process could imagine what impact these standards and guidelines would have during the coming years. It must be considered a remarkable result of the Bologna Process that in the year 2020 almost all countries in the EHEA – even those with very small higher education systems – have implemented comprehensive quality assurance policies that cover internal quality assurance at higher education institutions and an external quality assurance system with an independent quality assurance agency. (European Commission/EACEA/Eurydice, 2018: 128-132) Taking into account that these quality assurance regimes and systems are characterised by a certain level of convergence through the implementation of the ESG, and that there is a broad common understanding of what quality assurance in higher education is and what values and principles should be considered good practice, this remarkable result can be called a huge success. A common understanding of quality assurance and common principles turned out to form an important basis for recognition of prior learning and for student mobility.

EXTERNAL QUALITY ASSURANCE AND ITS RELEVANCE FOR IMPLEMENTATION OF OTHER BOLOGNA COMMITMENTS

When the authors of the 2018 edition of the *Bologna Process Implementation Report* state that “today, not only is there a consensus that quality assurance is necessary to ensure accountability and support enhancement...” (European Commission/EACEA/Eurydice, 2018: 129) they might be right, but at the same time they leave in the shadow other features of the complex nature of external quality assurance in the EHEA.

A particular feature of this is its close link other reform agendas of the Bologna Process. These can be divided into two groups. The first group consists of elements of the original reform agenda such as recognition of

qualifications and prior learning, and in particular student mobility. The link between quality assurance and these goals is very close: it does not even have to be made explicit because recognition and mobility are automatically supported by a quality assurance that is based on common principles and standards. But still, these aspects are only at the edge of academic quality in the narrow sense.

The second group is even more interesting in this regard. It consists of elements that were added to the Bologna reform agenda over time such as the social dimension, democratic citizenship, equal access, tolerance, etc. Most of these elements entered the Bologna discussions through general political reform agendas that were only loosely linked to academic quality, if at all. These political goals have gradually become topics that are addressed in some way by the national quality assurance systems and partly, through the revision of the ESG in 2015, also at the European level. Consequently, quality assurance, particularly external quality assurance, contains an important component of policy enforcement or law enforcement. Without doubt, quality assurance has made a significant contribution towards the original and subsequent goals of the Bologna Process.

This role of quality assurance can be appreciated or criticised, but it nonetheless reinforced the relevance of quality assurance for the success of the Bologna Process and the evolution of the EHEA. In this regard the development of (external) quality assurance mirrors the development of the Bologna Process: from a reform agenda focusing principally on degree structures, to a much broader approach to reforming higher education. It is fair to say that this development is only one aspect of what can be called the “accountability drift” of external quality assurance since the early days of the Bologna Process. Widening the topics to be addressed by external quality assurance, linked in most cases to a stronger emphasis of regulatory purposes, has had a significant impact.

“As a consequence, the boundaries of external quality assurance have become blurred as far as the purpose is concerned. In practice this means that on the one hand there are procedures whose ‘pure’ quality assuring functions are complemented or even dominated by regulatory or accountability functions that are rooted in formal, public characteristics or refer to certain political priorities that might not be linked to quality of provision in the narrow sense. On the other hand, there are procedures that predominantly support the development of programmes and institutions without any regulatory aspects. Nevertheless, both approaches are subsumed under one concept of quality assurance.” (Hopbach and Flierman, 2020: 32)

This approach to, or at least perception of, quality assurance in the Bologna Process has to be kept in mind. It leads to questions about the purpose of quality assurance, particularly of external quality assurance. In conclusion, one can say that external quality assurance suffers increasingly from what can be called the “Goldoni trap”. More and more, external quality assurance looks like Goldoni’s servant of multiple masters.¹

At the same time, however, one has to ask whether this specific development of quality assurance in the EHEA is positive or negative. What does it actually mean that in 2010 the universities in Europe named external quality assurance as the most important recent policy change in higher education? (Sursock. A. and Smidt, H., 2010) It might be an indicator, to say the least, that external quality assurance was perceived not only as assuring and enhancing the quality of the institutions’ degree programmes, particularly if one takes into account the substantial changes in many countries regarding legal frameworks, governance and funding of higher education.

The bridge that shall move the focus of these reflections from external quality assurance to ENQA is an activity that turned out to be maybe the most powerful and influential contribution of ENQA to promoting and achieving the goals of the Bologna Process. This is the external evaluation of quality assurance agencies. The ENQA Agency Reviews have not only had a significant impact on the implementation of the European agreements with regard to quality assurance; the reviews have also had a significant impact on the development of ENQA itself.

It is revealing that the external evaluations of quality assurance agencies are often referred to as external reviews of national quality assurance systems. Of course the external evaluation of a quality assurance agency has never been meant to be an assessment of a national quality assurance system. The external evaluation of quality assurance agencies is supposed to answer whether and how an agency meets the requirements of parts two and three of the ESG. If the agency applies these standards and guidelines appropriately it can become a member of ENQA and it can be listed on the European Quality Assurance Register for Higher Education (EQAR). From the perspective of quality assurance, this core relevance of the ESG, has a significant impact on the way the ESG are used and applied by quality assurance agencies. This is understandable or even necessary. But under these circumstances, the ESG do not just give guidance by presenting and promoting good practice but instead are understandably considered as a compliance tool. For a reader of the 2005 version of the ESG and even of the 2015 version it is obvious that the ESG were never meant to be such

¹ “The Servant of Two Masters” (Italian: *Il servitore di due padroni*) is a famous comedy by the Italian playwright Carlo Goldoni written in 1746.

ENQA is also a prime source of expertise with regard to the application of the ESG

a compliance tool. In practice this has developed into a situation whereby the stipulations of the ESG have to be complied with, and in cases where the nature of certain standards do not imply a one-size-fits-all application, a certain consensus has emerged regarding the interpretation of the standards and the guidelines.

A second aspect also comes into play. As explained in the introduction to the ESG, the three parts are interlinked: according to part 3, agencies must apply the standards for external quality assurance in line with part 2, and according to part 2, external quality assurance has to take account of the implementation of internal quality assurance in line with part 1. The link between the three chapters leads to the situation that the external evaluation of a quality assurance agency in practice also includes an assessment of national regulations for internal quality assurance at institutional level.

The situation becomes even more complicated because of the dual use of the results of the ENQA agency reviews by ENQA and by EQAR. The complication results from the different natures of these two organisations and consequently their different approaches to the external evaluation of agencies. On the one hand, ENQA is an association of quality assurance agencies in which provides services to its members and contributes to policy-making on their behalf. As one of the main actors in the development of the ESG and the evaluation of their application in national contexts, ENQA is also a prime source of expertise with regard to the application of the ESG.

On the other hand, EQAR is the list of quality assurance agencies that comply with the ESG. Hence the approach of EQAR to the evaluation of quality assurance agencies is necessarily that of a regulator. This is reinforced by the fact that several countries have made inclusion on the register compulsory for the national quality assurance agency and also a precondition for foreign agencies to be active in their national systems. Understandably EQAR has a narrower view of the ESG and has to apply a regulatory approach when assessing compliance. From the perspective of ENQA, the growing relevance of the external evaluation of quality assurance agencies and in particular the fact that ENQA has organised almost all the reviews of quality assurance agencies in the EHEA makes clear that the decision on compliance with the ESG by ENQA holds great importance for quality assurance agencies and national authorities. (Nordic Institute for Studies in Innovation, Research and Education, 2019: 18)

If one takes into account the sheer number of reviews organised by ENQA (more than 140 since 2006, with the peak of 20 reviews in 2019) one can imagine what relevance the agency reviews had and still have for ENQA's regular activities². While this is testament to the importance of this service, during his time serving on the ENQA Board from 2007 to 2013, the author felt that the Board and the Secretariat had to invest too much time and resources on the reviews and related actions compared to other activities. Since then the average number of reviews per year has almost doubled.

Nonetheless, the occupation of ENQA with the agency reviews as one critical factor for the implementation of the Bologna Process reforms in the EHEA is just one example of the relevance of the Bologna Process agenda for ENQA activities; it has been a core feature from the outset.

The introductory quote from the publication released to mark the 10th anniversary of ENQA clearly shows that since the early days of the Bologna Process ENQA has played an active role. Soon after its foundation, ENQA started to play an official role in the Bologna Process, firstly by being invited as consultative member to the Bologna Follow-up Group (BFUG), secondly through involvement in specific initiatives mandated by the Bologna ministers such as:

- the development of the ESG in 2003-05, together with the other members of the E4 Group: EUA, EURASHE and ESU (then still ESIB);
- the revision of the ESG together with the E4 Group and EQAR, BusinessEurope and Education International in 2012-15;
- the development of *The European Approach for Quality Assurance of Joint Programmes* as part of a BFUG ad-hoc expert group in 2012-15.

As a side-note, it is important to highlight the contribution of the consultative members to the development of the Bologna Process. As a side effect the Bologna Process also triggered a development which today seems natural, namely the crucial role that stakeholders play in quality assurance. From the beginning, student involvement and involvement of other stakeholders formed part of the discussions on the ESG. Also for ENQA, close collaboration with stakeholders is a natural feature of the Association's daily activities.

² Data taken from the ENQA website.

In addition, many other ENQA activities, past and present, relate directly to topics on top of the Bologna agenda such as (to name but a few):

- The various projects and publications on recognition
- The *Study on the Diploma Supplement as seen by its users* (Aelterman et al., 2009)³
- The project *Transparency of European higher education through public quality assurance reports – EQArep*⁴
- *The project An Adaptive Trust-based e-assessment System for Learning – TeSLA*⁵
- The project and publication *Quality Assurance of Cross-border Higher Education – QACHE*⁶
- The publication *Quality Assurance of Joint Programmes* (Frederiks et al., 2012)⁷

Many more could be added to this list. It is of no surprise that a visitor to the “Work and Policy Areas” section of the ENQA website is first directed to the Bologna Process through various links. It is simply an indicator of the decisive meaning that the Bologna Process has for ENQA’s agenda.

If asked to name ENQA’s most relevant achievements, non-members and in particular representatives from ministries, higher education institutions, and other stakeholder organisations would presumably refer to the ESG and also the relevance of the external reviews of quality assurance agencies. With good reason one can describe ENQA’s development from a small and loose network or platform of quality assurance agencies and other organisations interested in quality assurance to the main actor and source of expertise in external quality assurance in the EHEA as a true success story. Compared to 2000, ENQA today is an Association with a professional structure, a participatory governance, and with established strategies and work plans. This enables ENQA to play a decisive role in the formulation of principles and policies for external quality assurance in the EHEA. As a result, ENQA deservedly enjoys high reputation and recognition. As outlined in this paper, the Bologna Process has been a substantial driver for the organisational development of ENQA.

It is fair, however, to also name a possible downside of this development. Neither (external) quality assurance

3 Available here: https://enqa.eu/indirme/papers-and-reports/associat-ed-reports/Diploma%20Supplement%20Study_Edit%20MS.pdf

4 Project web page available here: <https://enqa.eu/index.php/transparen-cy-of-european-higher-education-through-public-quality-assurance-re-ports-eqarep/>

5 Project website available here: <https://tesla-project.eu/>

6 Project web page available here: <https://enqa.eu/index.php/quali-ty-assurance-of-cross-border-higher-education-qache/>. The project publication is available here: <https://enqa.eu/indirme/papers-and-reports/occasional-papers/QACHE%20final%20report.pdf>

7 Available here: https://enqa.eu/indirme/papers-and-reports/work-shop-and-seminar/ENQA_wr_19.pdf

nor ENQA were inventions of the Bologna Process. Both have meaning and relevance in their own right. Through the huge significance of the Bologna Process and the success of the ESG, one could say that ENQA has been overwhelmed by the requests and opportunities that came with its involvement as active contributor to the process. Other lines of actions with great significance for ENQA’s members and for the development of external quality assurance might therefore run the risk of attracting less attention than they should. Also, many of ENQA’s projects and initiatives that have been important in supporting its members are not specifically linked to the Bologna Process, such as:

- *Integrating Entrepreneurship and Work Experience into Higher Education – WEXHE*⁸
- *the ENQA Quality Assurance Professional Competencies Framework*⁹, and
- *the ENQA Leadership Programme*¹⁰

One can also add ENQA’s significant contribution to international development projects such as:

- *Harmonisation of African Higher Education Quality Assurance and Accreditation – (HAQAA Initiatives 1 and 2)*¹¹
- *EU Support to Higher Education in ASEAN Region – SHARE*¹²

This gives evidence of a broader field of activity than only the Bologna Process. It highlights that ENQA’s service to members and the development of external quality assurance within and outside the EHEA, should not be viewed only through the lens of the Bologna Process.

The development of (external) quality assurance and of ENQA since the inception of the Bologna Process gives evidence of the decisive impact that the Bologna Process had; but is also demonstrates that the Bologna Process is not the only reference point for this development. It is fair to state that the Bologna Process contributed to the meaning and reputation of both. At the same time, it dominated both developments and pushed them in a certain direction. Coming back to the initial question, “Is the Bologna Process a blessing and a curse for ENQA and External Quality Assurance?”, one can say that the answer should not be an either/or response. The positive impact of the Bologna Process on the development of external quality assurance and of ENQA is evident. But the success

8 Project website available here: <https://wexhe.eu/>

9 Available here: <https://enqa.eu/indirme/papers-and-reports/occasional-papers/ENQA%20Competencies%20Framework.pdf>

10 There are multiple reiterations of the ENQA Leadership Programme. Information on the programme to be held in 2021 can be found here:

<https://enqa.eu/index.php/enqa-leadership-programme-2020-21/>

11 The HAQAA 1 website is available here: <https://haqaa.aau.org/>. The

HAQAA 2 website is available here: <https://haqaa2.obsglob.org/>

12 Project website available here: <https://www.share-asean.eu/>

of the Bologna Process might also have contributed to a narrowed perspective on the nature and purpose of external quality assurance in higher education and of ENQA.

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Higher education: a rapidly changing world

and a next step for the *Standards
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in the European Higher Education Area*


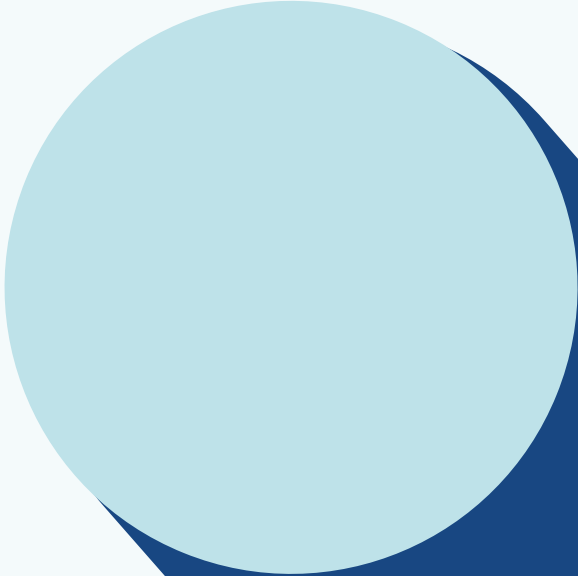
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This paper is the result of discussion among a group of colleagues during 2018 and 2019. The authors wish to thank in particular Douglas Blackstock (QAA, UK) and Pdraig Walsh (QQI, Ireland) for their valuable contributions to this paper



Introduction

Since their adoption in 2005, the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) have made a significant contribution to achieving some of the important goals of the European Higher Education Area (EHEA), namely mutual trust in the quality of higher education provided, and in qualifications as a basis for mutual recognition and mobility of students. This demonstrates the importance of a common framework for external quality assurance for the development of the EHEA.

Since 2005, we have witnessed the world of higher education evolve, it seems, at an ever-accelerating pace and with increasingly deep shifts in its purpose, nature and provision. The same can be said of higher education institutions themselves. This remark was true before the Covid-19 crisis struck the world, and it certainly is even more true now. It is too early to say what the ultimate impact of this crisis on higher education will be, but major changes will take place, and quality assurance has to react and adapt to them.

At the same time, we are witnessing a growing diversity of approaches to external quality assurance across the EHEA and beyond. This diversity covers the organisational and legal framework of external quality assurance, its purpose, scope, and methodology. In addition, quality assurance agencies show a great variety as regards their nature, remit, and so on.

This changing world of higher education suggests the need for a next step in the development of a common framework and understanding of the system of quality and external quality assurance, without spoiling the successes and values achieved so far. While this seems natural and reflects the substantial level of dynamism that external quality assurance has always shown, one also has to acknowledge that the foundations of external quality assurance and the fundamental agreements about its purpose, scope, methodologies and instruments have hardly changed in the last 25 years. This has generated criticism that external quality assurance inhibits innovation and/or is insufficiently focussed on outcomes for students.

A critical and self-critical discussion about the purpose, principles, and methodologies of external quality assurance is therefore due in order to develop an EHEA-response to current and future challenges without compromising the achievements to date. This paper sets out an initial analysis of and seeks to promote a discussion about some of the pertinent questions and topics, without aiming at being comprehensive. Finally, it presents some critical points that could form the basis of and give orientation for a future framework. It is the result of discussions among colleagues from quality assurance agencies and consequently focusses on

external quality assurance while acknowledging that this cannot be separated from similar consideration of internal quality assurance.

External quality assurance in higher education

The Bologna Process is one of the most influential reform agendas in higher education worldwide. It has already had a very significant impact on the development of higher education in the EHEA and will most likely continue to do so for many years to come. Since quality assurance is one of the key commitments of the Bologna Process and one pillar of the EHEA, this also applies to the development of internal and external quality assurance.

The process began with the commitment of ministers at the 2003 ministerial conference in Berlin to implement national quality assurance systems that include, among others

- a. evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results; and
- b. a system of accreditation, certification or comparable procedures (Berlin Communiqué, 2003: 3).

Since then, tremendous efforts have been made to design and implement external quality assurance procedures for degree programmes and to link these to various kinds of state approval. This focus on the external quality assurance of learning and teaching was determined by the original limitation of the Bologna Process to degrees and to degree structures.

The adoption of the ESG at the 2005 ministerial conference in Bergen re-confirmed this focus and paved the way for convergence of external quality assurance procedures based on principles for the design of the review methodologies. The adoption of the revised version of the ESG in 2015 emphasised this focus even further. On the one hand, the purpose of the revision was to enhance “their clarity, applicability and usefulness” (Bucharest Communiqué, 2012: 2), while the originally foreseen revision of its scope was omitted, hence no fundamental modifications were introduced. On the other hand, references to the implementation of other instruments of the Bologna Process such as qualification frameworks, ECTS, etc. were added, which further strengthened the focus on learning and teaching.

Over time, in many EHEA countries, the focus on external quality assurance has shifted from the programme level towards the institutional level. In some cases, the perspective of quality assurance at institutional level was broadened to include missions other than education alone. Although the ESG allows for such a shift, they still

maintain an emphasis on education and programme evaluation, from an external and/or an internal perspective.

Consequently, the common practices in external quality assurance of higher education are characterised by reviews of degree programmes and/or institutional arrangements for supporting educational quality including internal reviews of such programmes.

The purpose of external quality assurance is often referred to as

“the twin purposes of accountability and enhancement. Taken together, these create trust in the higher education institution’s performance. A successfully implemented quality assurance system will provide information to assure the higher education institution and the public of the quality of the higher education institution’s activities (accountability) as well as provide advice and recommendations on how it might improve what it is doing (enhancement). Quality assurance and quality enhancement are thus inter-related.” (ESG 2015: 7)

The main principles applied in external quality assurance are:

1. Main responsibility resting with the higher education institutions: In taking account of the primary responsibility of institutions for the quality of their provision and its assurance, the basis for any kind of external review is a self-evaluation by the reviewed programme or institution.
2. Peer review: Expertise of and review by peers is at the core of the methodologies. A broad concept of peers is applied, including students and practitioners from the labour market.
3. Transparency: The methodologies and standards used, as well as the outcomes, have to be published.
4. Cyclicity: Reviews have to be repeated on a cyclical basis.

Over the past 10-15 years, the ESG have had an important function in developing and safeguarding the quality of higher education throughout the EHEA. In combination with other tools such as the qualifications framework, recognition based on the Lisbon Recognition Convention, and ECTS, the ESG have set a minimum standard or threshold for quality in higher education programmes; have stimulated improvement in the quality of higher education in many countries in and beyond Europe and have guaranteed important basic principles such as the involvement of students in quality assurance procedures. As a consequence, the ESG have made a significant contribution to achieving the goals set for the Bologna Process such as recognition of qualifications and mobility of students by creating and fostering trust

and mutual understanding among the higher education systems and the higher education institutions in the countries of the EHEA.

The ESG have also had an obvious and significant impact at organisational level by going beyond standards for external quality assurance itself and adding standards for the actors involved in external quality assurance. Consequently, existing bodies, such as quality assurance agencies, have been modified to comply with the ESG and new agencies have been set up based on the implicit model underlying the ESG. As a result, most countries or higher education systems now have national quality assurance agencies whose organisational structure and governance comply with the ESG, and that are independent from undue external – in particular, political and state, and institutional – influences.

Based on the inter-relation between the three parts of the ESG, and the fact that a successful external review against the ESG is the core basis for recognition of quality assurance agencies at the European level and beyond, the external reviews of agencies have de facto turned into reviews of the national quality assurance systems. Although not originally intended to be so, this development has added even more relevance to the reviews, and in addition has strengthened the application of principles such as the autonomy and independence of quality assurance agencies.

Above all, the ESG have facilitated a common understanding of quality assurance among all parties involved, namely higher education institutions, teachers and students, quality assurance agencies, ministries and other public authorities, and other stakeholders (ENQA, 2011).

The current state of development of external quality assurance: between convergence and diversity

Despite the focus and impact of the ESG and the obvious convergence in the design of many external quality assurance procedures in the last twenty years, one has to acknowledge a diversity of approaches to external quality assurance in the higher education systems of the EHEA. This goes beyond the notion of diversity that has always been enshrined in the ESG, which states that

“the ESG may be used and implemented in different ways by different institutions, agencies and countries. The EHEA is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality

and quality assurance in higher education inappropriate.” (ESG 2015: 8)

The current diversity covers:

Diversity in organisation of the quality assurance system: In some higher education systems a quality assurance agency is the main or even sole actor in the field of external quality assurance whereas in other systems more actors or instruments are involved, such as national student surveys, various reporting systems, system-wide analyses of key performance indicators or other types of usage of data. In particular regarding the transparency-function of external quality assurance, one has to acknowledge that the use and analysis of data by other external bodies affects the ‘traditional’ role of quality assurance agencies.

Diversity in purpose: In some quality assurance systems the purpose of reviews is first and foremost public recognition or approval/licencing to operate programmes or higher education institutions by assuring that certain standards and priorities are met. A secondary purpose may also be accountability, especially for public money spent on higher education. In other systems, reviews are conducted primarily to support the development of programmes of fully autonomous and self-accrediting higher education institutions, without any links to formal approval.

As a consequence, the boundaries of external quality assurance have become blurred as far as the purpose is concerned. In practice this means that on the one hand there are procedures whose “pure” quality assuring functions are complemented or even dominated by regulatory or accountability functions that are rooted in formal, public characteristics or refer to certain political priorities that might not be linked to quality of provision in the narrow sense. On the other hand, there are procedures that predominantly support the development of programmes and institutions without any regulatory aspects. Nevertheless, both approaches are subsumed under one concept of quality assurance.

Diversity in scope: In many national quality assurance systems, external quality assurance follows a comprehensive approach by going beyond the limitation to learning and teaching and instead addressing more, or even all, areas of activities of the higher education institution. In doing so the comprehensive approach takes into account the design and delivery of programmes which normally follow institutional policies and also takes addresses the interrelations or even interdependencies of the higher education institution’s activities, including research and the third mission. Generally speaking, the internal management and quality assurance systems as such do not necessarily have to differentiate in their approach to the various activities of an institution. Hence a broader approach to external quality assurance fits

the logic of the internal quality assurance and internal management systems of many institutions.

In addition, in many national quality assurance systems, external quality assurance comprises more than just one approach, instead including various procedures, some of which might address the programme level, and others that might address the institution as a whole or just its internal quality management system.

Diversity in methodology: External quality assurance makes use of instruments and methods other than peer review alone, such as national student surveys, quantitative or qualitative data analysis, indicators of student success or employability, regular monitoring, and non-cyclical procedures such as risk-based approaches which form an important part of the procedures, but which are not addressed by the ESG. It is not unreasonable to expect that some of these instruments and methods will gain in importance and impact. This is even more true as the reliability of the originally most important methodology, peer review, is seriously questioned from time to time.

In addition to the aspects mentioned above, quality assurance agencies also show a much greater diversity regarding their nature and remit etc. than one might expect given that most of them undergo external reviews against the ESG. This diversity covers:

Diversity of the legal framework: Whereas some higher education systems have one nationally recognised agency conducting one type of review, other systems foresee more than one agency and/or more than one procedure. Furthermore, some agencies do not have a national legal framework but act at the discipline level or at regional or international level. Very often linked to this, some agencies are statutory bodies and publicly funded, whereas other agencies are private service providers based on the market model and are dependent on commercial fees.

Diversity of remit: Some agencies’ remits go beyond external quality assurance of programmes or institutions and cover other activities of higher education, such as recognition, research and analyses, data collection, rankings, quality of other educational sectors and/or levels, even sometimes including law enforcement. Consequently, a part of the activities of agencies is left out of consideration in the ESG review procedures. Other agencies’ remits foresee a division of quality assurance responsibilities with other actors.

Despite this diversity, the ESG broadly present a “one-size-fits-all” approach that is based on an assumption of one national agency conducting one type of procedure. Furthermore, even where the ESG permit diversity, its interpretation by some actors can be narrower and its use by agencies remarkably varied.

Higher education in motion

Let us turn now to the object of quality assurance: higher education. We observe changes in society and in the political field in this area. Demand for and access to higher education is increasingly high, not only in the EHEA but also, and even more so, in other regions of the world. The balance of attention is shifting towards the East, particularly to China and South and South-East Asia. Globalisation influences the world of higher education in many ways, and at the same time political tensions across Europe and globally are increasing. Higher education (and research) remains one of the fields that allows for peaceful exchange and collaboration in an ever more complicated world. The world of higher education is evolving, it seems, at an ever-accelerating pace and with increasingly deep changes:

- Massification of higher education continues.
- New modes of delivery are spreading: flexible and personalised education, as well as several forms of blended learning are becoming more important; as are lifelong learning, joint programmes, cross-border education provision, and, most recently, the rise of “credentials”.
- Digital access to advanced information is changing the nature of higher education.
- Sometimes competing tensions, such as the demand for skills seem to outweigh the demand for knowledge.
- The number and relevance of non-traditional providers is growing.
- The rising numbers of fraudulent providers such as degree mills and thesis mills create a ubiquitous challenge.
- Digital technologies are already affecting the provision and experience of higher education and will cause a substantial transformation.
- In much of Europe, it seems that there is no clear choice between private and publicly-funded higher education, however in many European countries with traditionally public higher education systems, it seems increasingly difficult to maintain an adequate level of public funding, given other competing demands from defence and healthcare to climate change and sustainability.
- Last but certainly not least, there is the impact of the Covid-19 crisis. Although much of the impact of the crisis is still unclear, it seems obvious that the importance of online teaching and assessment is dramatically increasing, while face-to-face activities that involve many people (students) will be less prominent. Moreover, limitations on the use of public transportation will influence the provision of education on campuses.

The higher education sector regularly claims that it has to prepare students for work and life in a rapidly changing world, and the Covid-19 crisis adds a completely

new perspective and more dynamism to this, requiring even more flexibility and adaptiveness from students and graduates. On top of this comes the demand for skilled workers, in health care and government for instance, who can deal with such crises.

The question as to whether traditional higher education institutions will be able to maintain their function in delivering recognised degrees might sound provocative at the moment. But what about in five or ten years from now? Higher education institutions themselves are also undergoing substantial changes:

- Competition as one of the traditional driving forces gains ever more importance, and increasingly on a global basis.
- Diversification of profile increases, partly as a consequence of competition, partly driven by political agendas. This includes diversification regarding mission: elitist vs broadened access approach; regional vs international orientation; engagement in third mission vs “ivory tower”; and teaching vs research.
- Higher education institutions have to make stronger contributions to fulfilling political agendas, not least in contributing to finding solutions for global challenges such as climate change, consequences of population growth, global peace, and flight and expulsion. Ironically, this political pressure can lead to convergence in mission and function as well as to more distinctiveness.
- The institutional structures and governance are changing, in part due to diversification: one campus vs multi-campus possibly including cross-border provision; centralised vs decentralised.
- Management changes: common to many higher education institutions is an increasing level of autonomy that leads to professionalisation of management and a to a strategic relevance of (internal) quality assurance. Consequently, the management capacity and systems are developing and improving. Internal information management systems allow for much more elaborated evidence-based management of higher education institutions than in the past.
- As a counterbalance to the increasing level of autonomy, higher education institutions are being held more and more accountable for their activities and have to show that they take responsibility commensurate with this autonomy. This is true in general, and certainly for institutions that depend on public funding. Parliaments require that taxpayers’ money is well spent.

Although external quality assurance has proven to be an equally dynamic field, it is questionable whether these significant or even fundamental changes are addressed adequately by external quality assurance, where the general principles and procedures remain largely unchanged.

However, the question arises as to whether external quality assurance needs to explicitly address all such changes. Particularly regarding the above-mentioned legitimate political agendas and priorities, one has to ask whether these should be dealt with through external quality assurance, or via other instruments, such as performance contracts or funding arrangements between government and institutions.

Taking stock and next steps

In order to keep up with the recent and ongoing developments in the world of higher education and beyond, external quality assurance needs to adapt. However, a more fundamental revision of the foundations and principles of external quality assurance as described in ESG is not the only answer to the changing face of higher education. One also has to acknowledge that a careful analysis of the current ESG reveals that they already embrace a philosophy of diversity and flexibility as regards methodologies as well as providing room for innovation. In particular, the guidelines to the standards demonstrate that the ESG do not call for a one-size-fits-all approach. In fact it is the contrary. Hence all actors in external quality assurance: panels conducting agency reviews, governments, EQAR, and agencies themselves, have to critically admit that the application of the ESG often looks different depending on the circumstances. Their often overly narrow interpretation of the standards and the guidelines sometimes inhibits agencies from innovating and adapting to new circumstances which, consequently, can act as a constraint on institutions. Most of the standards are thresholds with which agencies have to comply, but there is a danger that the guidelines, originally designed to identify a range of effective practices, are becoming rules that should be rigidly applied regardless of national or institutional contexts. If such a rigid approach continues, it threatens the existing confidence that the ESG can be a unifier across a broad range of national and organisational contexts. Moreover, some standards may have to be reconsidered, given that at the time of drafting the ESG 2005, the prevalent model for external quality assurance in Europe was that of one national agency per country, looking especially at the quality of degree programmes, delivered in the traditional mode.

The recently published self-evaluation report of the ENQA Agency Review process observes some weaknesses related to the consistency of review reports, the application of guidelines, the relatively small panels and the double decision-making process of ENQA and EQAR (ENQA, 2019). Furthermore, discussions are ongoing about the interpretation of the requirement of thematic analysis, requirements for internal structures, and requirements regarding activities outside the EHEA, etc. All these issues have in fact led to numerous debates about interpretations of the ESG and the lack of opportunity to innovate (ENQA, 2019).

Consequently, a new framework alone will not be the solution to current problems. In addition, a meaningful application of such a framework that keeps a balance of standardisation – if necessary – on the one hand, and flexibility and room for innovation on the other hand, will be the responsibility of all partners involved in external quality assurance.

The concept of external quality assurance revisited and a future common framework for external quality assurance

In light of the analysis and arguments presented in this article, the authors present below some “building blocks” for a discussion on a new framework for external quality assurance, based on an expanded set of underlying principles.

THE EHEA CONTINUES TO NEED A COMMON FRAMEWORK FOR (EXTERNAL) QUALITY ASSURANCE

The significant achievements of the ESG demonstrate the importance of a common framework for external quality assurance for supporting some of the important goals of the EHEA, namely mutual trust in the quality of higher education provided, and qualifications as a basis for mutual recognition and mobility of students. The public function of external quality assurance requires common principles and well-defined, clear, and simple standards also in the future. Due to the growing diversity of higher education institutions and provision of programmes, the relevance not only of such common principles and standards but also shared values will grow even more important in the future.

REQUIREMENTS FOR A FUTURE COMMON FRAMEWORK FOR EXTERNAL QUALITY ASSURANCE

By and large, the underlying principles of the ESG like cyclicity, independence, transparency and knowledgeability, and student involvement will remain valid also in the future. However, they have to be expanded by a set of new principles, taking into account the different perspectives of diversity, described above.

CYCLICALITY

A future framework for external quality assurance should maintain cyclicity as a relevant principle of external quality assurance. Cyclicity of external quality assurance is, however, often confused with cyclicity (sometimes rigidity) of a certain procedure. Instead, innovative approaches to the concept of cyclicity are required.

The stage of development of an institution, a unit, an activity, or a programme and possible specific circumstances of an external review can make repetition of the same procedure meaningless. A shift from programme to institutional level, a shift from a control dimension to a developmental dimension, a shift in focus from a certain subject or group of subjects to another, the ability to use data from ongoing monitoring, and other comparable changes can be useful and appropriate and will have a significant impact on the design and the cyclical perspective of the external quality assurance system.

INVOLVEMENT OF INTERNAL AND EXTERNAL STAKEHOLDERS

The involvement of all internal stakeholders, like teachers and students, representatives of different sectors in higher education, and external stakeholders like employers will need to remain a requirement. They should participate in review panels and in boards, commissions or assemblies of external quality assurance agencies.

INDEPENDENCE

External quality assurance needs to be trustworthy. Therefore, it should be free from political, commercial, or any other undesired external influence. This means that it will always have to be provided by independent organisations. Relevant stakeholders, like students, trade unions or employers should be involved in an independent role.

TRANSPARENCY AND KNOWLEDGEABILITY

In order to fulfil its function, external quality assurance should be knowledge-based and transparent. Strategies, procedures, reports and decisions should be published and easily available to the public. Procedures should be fair and applied on an equal and even basis; and they should offer opportunity for complaints, objections and appeals.

In addition to these continuing criteria, a revised system of external quality assurance ought to meet, in our view, the following four new core requirements related to the dimensions of diversity as described above.

EXTERNAL QUALITY ASSURANCE HAS TO BE BASED ON DIFFERENTIATED CONCEPTS ACCORDING TO ITS VARIOUS PURPOSES

A future framework for external quality assurance has to address how to differentiate explicitly the various purposes of external quality assurance. In a future framework this might result in different chapters: on the one hand for external quality assurance that is dominated by its public functions, especially accountability or regulation of qualifications, programmes and eventually other

activities or institutions themselves, and on the other hand for more developmental procedures that first and foremost support higher education institutions and their activities. Careful attention has to be paid to standards for methodologies and instruments. Designing them to be fit for purpose might lead to different methodologies and instruments for regulatory procedures that form the basis for approval and/or funding decisions but are still part of quality assurance as opposed to those for procedures that predominantly serve the purpose of supporting higher education in enhancing quality or further developing structures, policies or activities.

Following the principle of diversity, a future framework for external quality assurance also needs to allow for differentiation according to the scope of quality assurance, which can range from certain fields of activities like programmes or outreach, or a combination of these, to the whole institution or certain relevant aspects of recent and future developments. Again, careful attention has to be paid to standards for methodologies and instruments.

EXTERNAL QUALITY ASSURANCE HAS TO ALLOW FOR DIVERSITY AND INNOVATION IN TERMS OF METHODOLOGIES AND INSTRUMENTS

Following the principle of diversity, a future framework for external quality assurance has to allow for a broader range of methodologies and instruments.

The methodologies have to be aligned to the function and to the focus of external quality assurance, should be up to date, and should limit the administrative burden where possible. It seems obvious that the developments regarding provision of information on higher education institutions and their activities, and regarding the evaluation and assessment of this information raises the question whether the methodologies agreed upon in the early 1990s are still up to date. It is questionable whether the methodological quartet of self-evaluation - peer-review - site visit - published report is still the best or even the most appropriate choice for the

External quality assurance has to allow for a broader range of methodologies and instruments

diverse functions. Peer review, for instance, is frequently criticised in scientific literature for not being objective and reliable enough, thereby undermining trust in the system. And the concept of a site visit as a regular element in a procedure has been severely challenged during the Covid-19 crisis.

While recognising the value of this methodology, new methods are available, such as analysis of (big) data, other sources of information, thematic analysis and other forms of research. Inclusion of new methods will enable external quality assurance to increase efficiency and effectiveness, adapt to new developments in education, focus on actual issues or problems (risk-based) and reduce administrative workload where possible. Innovation in methodology, instruments and procedures is relevant and possible at programme level, but certainly also at institutional level. The ESG were developed at a time when external quality assurance focused predominantly on programmes and qualifications. This has now more or less expanded to the institutional level, without the development of specific new instruments. There needs to be room for a more tailor-made approach to quality assurance at institutional level, whether it is applied for all activities of an institution, or only for part of them.

EXTERNAL QUALITY ASSURANCE HAS TO ALLOW FOR FLEXIBILITY IN THE CONDUCT OF PROCEDURES

Following the principle of flexibility, a future framework for external quality assurance needs to allow for a differentiation in the conduct of a procedure. While applying a basic level of necessary and natural standardisation as regards subject matter and core set of standards and underlying values there needs to be room to adapt the conduct of an individual procedure to the framework conditions of the given programme or institution in order to be able to address specific issues that might not be covered by the standardised approach or in order to be able to omit issues that are not relevant. Whereas there may be a greater need for fully standardised conduct of procedures that primarily serve the public function, more flexibility might be given in procedures that primarily encourage higher education institutions to reflect on their activities and performance and support them in their further development.

EXTERNAL QUALITY ASSURANCE HAS TO TAKE ACCOUNT OF DIFFERENCES BETWEEN AGENCIES

A future framework for external quality assurance should take into account that quality assurance agencies differ substantially in terms of their maturity or legal status, their geographical orientation, the domain or domains they are acting in, and their range of activities (also outside quality assurance). Hence any future

framework has to assure that the relevant standards are applied to external quality assurance procedures inside and outside the EHEA without hindering the agencies' activities outside external quality assurance.

As we have demonstrated above, important changes in the EHEA have taken place since the first development of the ESG in 2005. After modest adaptations in 2015, it is now time for a more thorough revision, taking into account the changes that have taken place in the field of higher education, especially in the EHEA, with regard to higher education institutions and quality assurance agencies, and in the available methodologies of quality assurance.

Our call is to open a discussion on an updated version of standards for quality assurance, which allows for continuous innovation of external quality assurance in all aspects.

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Role of ENQA in the development of evaluation activities and internationalisation

of higher education in Finland

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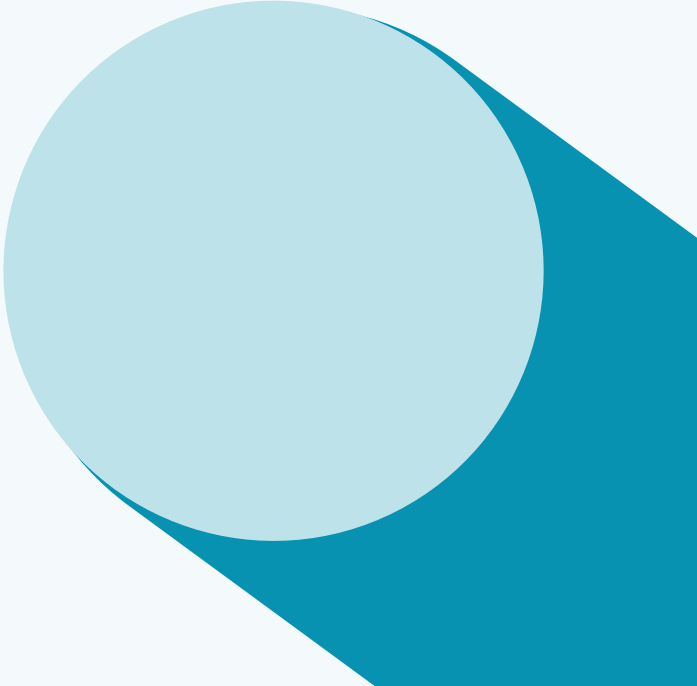
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Introduction

The evaluation of Finnish higher education institutions (HEIs) began in the mid-1990s as part of the general European development. In this article, we will examine how the initial stages of establishing ENQA's operation, the physical location of ENQA's office and the Director of its Secretariat in Helsinki in Finland from 2000 to 2010, and international networks contributed to the creation of the Finnish evaluation system and the development of our higher education system. We will also describe the internationalisation strategies of Finnish higher education in the European context. One part of this development in Finland was the creation of the universities of applied sciences (UAS) sector at the end of the 1990s and the beginning of the 2000s.

In addition, we will describe the development of the audit framework used by FINHEEC for auditing the quality management systems of HEIs. On the one hand, the framework is based on the approach of enhancement-led evaluation, adopted by Finland at an early stage, and on the other, on a continuous European dialogue, comparison of evaluation models and learning from others. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the feedback received from ENQA's external reviews have also played an important role by providing a framework and support for the evaluation of HEIs in Finland. At the end of the article, we will have a brief look into the future: what are the factors that will pose challenges to evaluation in the future and how can ENQA support the national agencies in the increasingly challenging operating environment?

Launch of the external evaluation of HEIs in Finland

When the Finnish Higher Education Evaluation Centre (FINHEEC) was launched in 1996, the key question was what kind of external evaluation would benefit Finnish HEIs. Very early, Finland adopted the enhancement-led approach, the idea that the evaluations should primarily support the HEIs' own enhancement activities and the national decision-making concerning education policy.

When ENQA started its operation 20 years ago, different countries were using different types of evaluation methods. The oldest type of external evaluation may be claimed to be accreditation, which has been a tradition in the United States for more than 100 years. In the very beginning of the 2000s, systematic evaluations of degree programmes were launched in many European countries. Some of the countries implemented institutional evaluations of HEIs. Benchmarking, the mutual comparison of best practices of the agencies, was also taking its first steps at the same time.

European external evaluation methods of HEIs typically consisted of three stages: a self-assessment by the HEIs, a site visit, and a report drawn up by the evaluation team. Later on, there was also discussion about including a follow-up evaluation as the fourth stage. The credibility of evaluation was linked to the fact that evaluation was implemented by peers. However, there were differences in the role of students or stakeholders between different countries. In some of the countries, including Finland, representatives of students and stakeholders participated in the planning and implementation of the evaluations of HEIs as members of the evaluation teams from the very beginning, while in some others, they were not participating at all. There were also differences in the relationships between and the roles of the ministries of education and the evaluation agencies depending on the country context. Over the past 20 years, a significant amount of development has taken place in these areas.

As one of its principles, FINHEEC outlined that the degree programmes and fields of study being subject to evaluation would have to be important as regards the current developments in society or have special development needs (FINHEEC, 1998). For instance, such programmes and fields included teacher education and certain fields of technology. Parallel to the programme evaluations, FINHEEC launched the institutional evaluations of universities. An example of the enhancement-led perspective in these institutional evaluations was the fact that universities were allowed to select the focus of their evaluation. FINHEEC also had a key role in the assessment of the operating licences of UASs. In addition, FINHEEC implemented three cycles of evaluations of centres of excellence in university education. The purpose of the centres of excellence evaluations was to identify good pedagogical practices and strengthen the position of teaching at universities alongside research. As a result, in addition to the enhancement-led approach, a multi-method approach was adopted as a key feature of the evaluation of HEIs in Finland.

In the initial stage of FINHEEC's operation, it was important to create trust in and appreciation of external evaluation of HEIs. It turned out to be significant that FINHEEC's first two chairs had been rectors of universities. With their authority, they created credibility, as did the other members, who represented universities, UASs, the working life and students. Another important factor was that the most senior leadership of the Ministry of Education (both the Minister of Education and the leadership of the Ministry's higher education unit) gave their support to the national evaluation of HEIs.

The establishment of ENQA from Finland's point of view

At the end of the 1990s, the cooperation of the European evaluation units was carried out as unofficial and informal

collaboration. Funding from the European Union enabled a representative of the EU to convene the Board meetings, covering the travel expenses even before the official launch of ENQA. In addition, inviting representatives from the ministries of education to joint conferences was established as ENQA's operating principle.

The launch of ENQA was substantially facilitated by the establishment of its Secretariat in connection with FINHEEC in Finland. The Ministry of Education of Finland agreed to finance the activities so that a full-time director could be employed for the Secretariat. The funding was sufficient to even cover some of ENQA's operating costs. The question of why a national ministry wanted to finance European activities is an interesting one. Arvo Jäppinen, who was a director of the higher education unit at the Ministry of Education at the time explains that Finland was interested in financing ENQA for two reasons:

“There were two general strategic policies that contributed to it. Firstly, there was a desire to strengthen the internationalisation development in general. Finland wanted to participate in international projects – both European and global ones – that were considered important for our own internationalisation development. Secondly, quality assessment and evaluation in general were regarded as an essential part of education and higher education policy. There was a desire to strengthen the quality and evaluation cultures. International cooperation played and still plays a key role in it. Having the Secretariat in Finland was certainly an additional factor but even then, these two strategic factors were in the background.”

Employing a full-time person in Helsinki helped to promote diverse cooperation between the ENQA member organisations. The task of ENQA's Secretariat was to prepare the Board meetings, seminars and conferences, and to contribute to the implementation of the Board's decisions. The Director of the Secretariat thus had an important role in making ENQA's operation possible from the very beginning. Another advantage was that shared project plans could be drawn up for funding applications and ENQA member organisations could be supported in their data collection and reporting activities. From the beginning, the projects were targeted at

comparing state-of-the-art methodologies and quality assurance processes in countries with ENQA members.

ENQA was an active publisher from the beginning of its operation. As from 2000, ENQA began to publish a newsletter for which topical issues were collected from members and partner countries. Two publication series, Occasional Papers and Seminar Reports, were launched during the first year. In the first 10 years, approximately 25 reports were published. The publications compared the evaluation practices of different countries either across the whole Europe or in a part of it (the Nordic countries, Eastern or Central Europe, etc.) and discussed the evaluation methods, evaluation trends (e.g. accreditation-like-procedures) and the terminology used. The concreteness of the Workshop and Seminar Reports on themes such as institutional evaluation, benchmarking, accreditations models, student involvement, quality assurance and the quality framework particularly contributed to the development of the evaluation agencies' activities.

In addition to communicating information, the publications also had an important educational meaning to those who drafted them. Implementing joint projects and drafting reports was a learning experience for the evaluation agencies of different countries, and the evaluation units became accustomed to the international cooperation between agencies.

In addition, ENQA's publications and seminars were particularly important for Finnish HEIs during the first years of the 2000s, when peer support was not yet available in Finland. Sirpa Suntioinen, who was a Quality Manager of the University of Kuopio at the time, says:

“When I was appointed Quality Manager of the University of Kuopio in 2002, I was given the task of creating an extensive quality system. At the time, I did not have many colleagues in Finland, so peer learning opportunities were extremely rare. However, ENQA started to publish its working group and workshop reports around that time. ENQA's seminars (Budapest, Madrid, Tallinn, Lyons, Antwerp and Gothenburg) were also important annual 'check points' for us. ENQA's publications and the discussions conducted with international colleagues at the seminars provided a framework for universities' quality management. They also gave us courage to develop the

Implementing joint projects and drafting reports was a learning experience for the evaluation agencies of different countries

quality management at our own university systematically towards a strategy-oriented approach emphasising continuous development instead of strict industry-driven quality standards. The ENQA seminars gave us new ideas and confidence that our quality management was going in the right direction.”

Internationalisation development behind the creation of the Finnish UAS sector

The first 20 years of ENQA's operation are characterised by strong internationalisation of higher education in Finland and also more widely in Europe. International trends have also contributed to the development of higher education in Finland. International examples from countries such as Germany, the Netherlands and the United Kingdom had a guiding role in the establishment of the UAS sector in Finland. The pilots of UASs were launched at the beginning of the 1990s with the aim of establishing higher education institutions that provided both practical and theoretical education especially for the tasks and needs that required practical skills in the working life. The post-secondary level education preceding the UASs had also come to a turning point internationally and very few educational institutions of a corresponding educational level were left in Europe or in the European education system.

In 1996-1999, FINHEEC played a key role in establishing the new dual higher education system by carrying out the quality assessment of the operating licence applications and funding projects of the educational institutions applying for the HEI status. FINHEEC supported the operating licence of 15 new UASs. At the same time, there was a political interest to create a regionally extensive network of UASs and campuses. Thus, the Government made a political decision to establish 20 new UASs in the country. It has to be noted that such political interference to independent evaluation results was unique and has not been repeated since. Because the importance of quality work was already emphasised at the application phase of UAS operating licence, each new UAS drew up its own evaluation and quality programme, modelling it on foreign HEIs and the quality systems of industry. In 1997, FINHEEC audited the internal self-assessment systems of four UASs and the related enhancement activities. This can be considered a pre-stage of the development of institutional quality systems and external evaluation in Finland.

At the beginning of the 2000s, the establishment of UAS master's degrees as a part of the Finnish system of higher education degrees was supported by the objectives of the Bologna Process, emphasising the role of higher education degrees with a different orientation but equal legal status in European higher education (see

Liljander, 2004). The FINHEEC evaluation of the pilot of UAS postgraduate degrees and a follow-up evaluation conducted by an international team (Pratt et al., 2004) played a key role in the establishment of UAS master's degrees. The development of the national higher education system and international evaluation of HEIs in Finland are thus closely linked. This is partly thanks to ENQA, which offered an opportunity and a network for Finnish actors interested in the international dimension of evaluation to engage in the activity.

Bologna Process accelerated the internationalisation of Finnish HEIs and the development of evaluation

Finland's membership of the EU in 1995 meant that HEIs and other educational institutions had equal opportunities for participation in international activities funded by the EU. Finland joined the Bologna Process in 1999. In the beginning, the creation of the European Higher Education Area was not welcomed by everyone in Finland (see Salminen, 2004). Not all HEIs had a clear understanding of the objectives and steering mechanisms of the Bologna Process. In the public debate, there was concern about whether it would be possible for Finland to maintain the strengths of its national higher education if the degree structures were developed in a more uniform and internationally comparable direction.

The commitment to and implementation of the reforms related to the Bologna Process among the signatory countries have primarily taken place through national legislation and steering. Like in Western Europe in general, the steering of higher education in Finland is characterised by the HEI's strong autonomy, based on legislation¹, and the HEIs' responsibility for the quality of the results of their activities. Currently, internationalisation with its different dimensions is an integral part of the Finnish HEIs. The Ministry of Education and Culture's three strategies for international activities at HEIs have paved the way for the HEI's activities during ENQA's operation (OKM, 2001; OKM, 2009; OKM, 2017; OKM, 2020).

The policy outlines of the Bologna Process have contributed greatly to the establishment of the external evaluation of quality assurance in higher education and its institutionalisation in Finland. The Berlin Communiqué issued as part of the Bologna Process in 2003 stated that countries in the European Higher Education Area should have national procedures for the external quality assurance of HEIs – “a system of accreditation, certification or comparable procedures”. In 2004, a working group set up

¹ See: the Universities Act 2009/558, section 3 Autonomy and the Universities of Applied Sciences Act 2014/932, section 9 Freedom of teaching and research.

by the Ministry of Education and Culture (OKM, 2004: 6) proposed that audits of HEI's quality systems should be introduced in Finland. The report stated that HEIs did not consider accreditation applicable to the Finnish operating environment and endorsed a different kind of quality assurance procedure. The report proposed that FINHEEC develops an audit procedure together with the HEIs. The first pilot audits were conducted in 2005. The HEIs' involvement in the development of the national framework was considered important from the beginning of the 2000s (see Salminen, 2004).

The report of the working group also strengthened the basis for the still prevailing division of roles between the HEIs, FINHEEC and the Ministry of Education and Culture in matters concerning the quality and quality assurance of higher education in Finland. HEIs bear the main responsibility for the quality of their activities and have the obligation to participate in the external evaluation of both their quality system and their activities. FINHEEC is in charge of the national external evaluation of higher education and the international cooperation in evaluation. The Ministry of Education and Culture is responsible for the national higher education policy and steering, including the decisions on field-specific educational responsibilities of HEIs. The above-mentioned division of roles and the suitability of the institutional audits as an external quality assurance approach in Finland are based on a well-established higher education system financed on uniform grounds from public funds.

The international dimension in the national evaluation of HEIs and the fact that the initial stages of ENQA's history were closely linked with Finland can be considered to have contributed more widely to the engagement of Finnish HEIs in the international operating environment. Early engagement in the international evaluation community has promoted the creation of trust between higher education providers throughout Europe. In addition, it has helped to identify solutions and good practices to common challenges facing actors engaged in quality assessment in HEIs, public administration and among stakeholders.

The Finnish approach emphasises enhancement

Enhancement-led evaluation and the European quality assurance principles have been the cornerstone of quality management at HEIs since the beginning of the external quality assurance activities in Finland. The external quality assurance in Finland has been based on a long-term approach trusting in enhancement-led evaluation in supporting the continuous development of HEIs. The approach has also been holistic, focusing on institutional quality audits that assess not only educational provision but also research, development and

innovation activities and the societal impact of the HEIs' activities. The third cycle of quality audits of HEIs is now underway in Finland.

When the quality systems of HEIs were being built, quality management was often seen as an activity that was separate from the other activities of the HEIs, and quality management was opposed. The group with the most critical attitude to quality management was university researchers. From their point of view, quality management was unnecessary because their work was already subject to academic quality assurance (Ala-Vähälä, 2011). University staff in particular saw quality management as a threat to the autonomy of universities. One of the arguments was that in quality management, quality is defined outside the university.

Finland's systematic long-term approach in external quality assurance can be said to be one of the factors contributing to the well-functioning quality systems of Finnish HEIs. This was the key result of the second cycle of audits in Finland. Quality systems are no longer systems that are separate from other activities. Quality management is also connected to operational management and strategic objectives. Several of the second-cycle audit reports emphasised that staff felt that quality assurance work formed a part of their everyday activities. According to the follow-up study carried out by Ala-Vähälä and Overberg, the audit decision has also contributed to HEI's credibility in international cooperation and to their reputation among stakeholders (Nordblad et al., 2020).

The Finnish approach has been consistent, yet the emphases of audit frameworks have changed and been developed for each audit cycle. The areas audited and the assessment criteria have been modified along with the development of quality management at HEIs. The audit frameworks and criteria have been planned and developed together with representatives of HEIs, students and working life. Feedback has also been systematically collected from the audit teams and HEIs to support the development of the agency's evaluation activities.

In the first audit cycle, the HEI's quality systems were new and audits focused on assessing if quality management was conducted in a systematic manner. In the second audit cycle, the role of the HEI's self-assessment was further emphasised and the notion of quality culture was introduced. The participation of the HEI community (staff and students) and the external stakeholders in quality management was increasingly stressed. In addition, the audits emphasised the role strategic management and steering play in quality systems and operational development. The audit was also connected to the profile and strategic objectives of each HEI with the help of an assessment area chosen by the HEI. Furthermore, HEIs were asked to provide concrete examples of the effectiveness of quality management.



The trust between FINEEC and the HEIs is an outcome of years of work.

The recommendations made in the ENQA external review of FINHEEC (Haakstad et al., 2010) influenced the framework of the second cycle audits in particular. Based on these recommendations, the quality management of educational provision was further emphasised in audits. This was done by assessing samples of degree programmes. In line with the recommendations of ENQA's external review team, HEIs were also encouraged to choose an international audit team. In the second cycle, approximately one half of the audits were conducted by an international audit team, which was a noticeable change to the previous cycle. The possibility for the audited HEI to request a review of the audit outcome (an appeals procedure) was also added to the audit process (FINEEC, 2016).

The third audit cycle, currently under way, encourages the HEIs to promote internationalisation, experimentation and a creative atmosphere. One of the key starting points in the planning of the new audit framework were the ESG 2015, which emphasise competence, a student-centred approach and research-based education. Professor Jouni Välijärvi, chair of the third cycle planning team, comments on the new audit framework in the following way:

“The forthcoming audits will direct the focus of the evaluations closer to the teaching and the student, while less attention will be paid to the details of the quality system. According to the common European guidelines, the student and the student’s learning will be central. We should welcome this change.” (Välijärvi, 2018: 83.)

The assessment areas in FINEEC's current audit framework are broad. The aim has been to link the themes assessed in audits more strongly with HEIs' current focus areas of development – competence, innovation and renewal, wellbeing and impact. The way HEIs maintain and enhance the quality of their activities in education, research, development, innovation and societal engagement continues to be important in the audits.

The information produced by the quality systems should support the HEI in achieving its strategic objectives and in developing and enhancing its activities. Quality management must also lead to effective improvement measures.

One of the conclusions drawn in ENQA's external review of FINEEC (2016-2017) was that enhancement-led evaluation is strongly supported by the Finnish higher education sector, students, the Ministry of Education and Culture and stakeholders. None of the parties interviewed in the external review wanted to change the enhancement-led approach applied in evaluations to a more compliance or control-oriented approach. It was also noted that enhancement-led evaluation is firmly rooted in FINEEC's activities. (Loukkola et al., 2017.) In Finland, the enhancement-led approach has not been self-evident but a conscious decision. FINEEC (and its predecessor FINHEEC) has an important role nationally as a promoter, implementer and developer of enhancement-led evaluations. As an agency, it has wanted to take this position and conscious efforts have been made to strengthen it. Enhancement-led evaluation is based on trust between the implementer of the evaluation and the evaluation participant and on the HEI's responsibility to enhance the quality of its activities. Participation and engagement, a positive development-oriented attitude, and a way of working that appreciates the evaluation participants are also essential. (Moitus and Kamppi, 2020.)

The trust between FINEEC and the HEIs is an outcome of years of work. The key factors in building trust include respect for the HEIs' autonomy, a tradition of working together, wide participation of stakeholders in the activities, equal treatment of the university and the UAS sectors, interaction and openness. FINEEC's activities are also clearly aimed at supporting the HEIs in the enhancement of their activities. This aim was also clearly recognised by the representatives of the higher education sector who participated in the ENQA external review. (Loukkola et al., 2017.)

The future of the evaluation of HEIs

In addition to the student-centred approach, FINEEC's current audit framework emphasises the societal impact of the HEIs' activities. The HEIs' societal impact is increasingly relying on institutions approaching their development and enhancement activities from a wider, holistic perspective. The impact of the HEIs' activities on society can manifest itself as education and culture, wellbeing, research that generates new knowledge, or as active participation in regional development, reform in society or solving global challenges. The changes in the operating environment of the HEIs are also reflected in FINEEC's quality audits. The audits do not only focus on analysing the current state of activities but are also

increasingly directed to the future. One of the tasks of evaluation is also to make trends visible. In line with the principles of enhancement-led evaluation, FINEEC's aim is that evaluations promote learning, participation, successes, awareness of achieving one's goals and generate data that has an impact on activities. FINEEC supports the interaction between the evaluation participants and learning from others. The agency also wants to do its part to support the change for better.

Evaluation activities are in a constant state of change and are continuously developed. Current views on the systemic nature of innovations and development activities pose challenges to evaluation. For example, relying on individual indicators may narrow down the phenomena under evaluation and does not consider the complex and cyclical processes of phenomena. The challenge faced by evaluations is to recognise the complexity of processes in which impact is created and to make visible the effects of the change process so that long-term impacts can be achieved. The whole is more than just a sum of its parts. The relations between the phenomena, the actors and the effects are often the only way to understand the change (Uusikylä, 2018).

The future brings new opportunities but also poses challenges to evaluation activities. We can already see that future evaluation needs will be increasingly linked to anticipation in the constantly changing operating environment. Artificial intelligence and big data may be helpful in analysing future needs as they provide data and analysing opportunities that may help to create a wider, more holistic picture. Certainly, we can also conclude that there is no going back. Instead, the role of evaluation is to a greater extent to respond to the challenges and needs of the rapidly changing society and world. Furthermore, higher education institutions must increasingly open up to the society around them.

All in all, enhancement-led evaluation continues to be a good response in a world that has become more complex. Trust, participation, multiple perspectives, supporting the objectives of the institutions and learning from others continue to play a key role in future evaluation activities. This is where we also see ENQA having an important role as an international pioneer and developer of external quality assurance in the future. ENQA brings together European actors in the field of quality assurance, regardless of their approach, in a way that no other organisation in Europe is able to do. This gives ENQA excellent opportunities to support networking, learning and sharing of knowledge and experiences between these actors at the European level.

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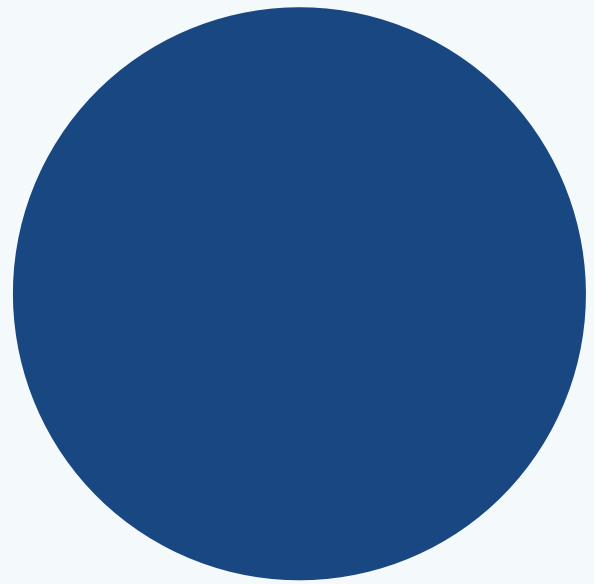
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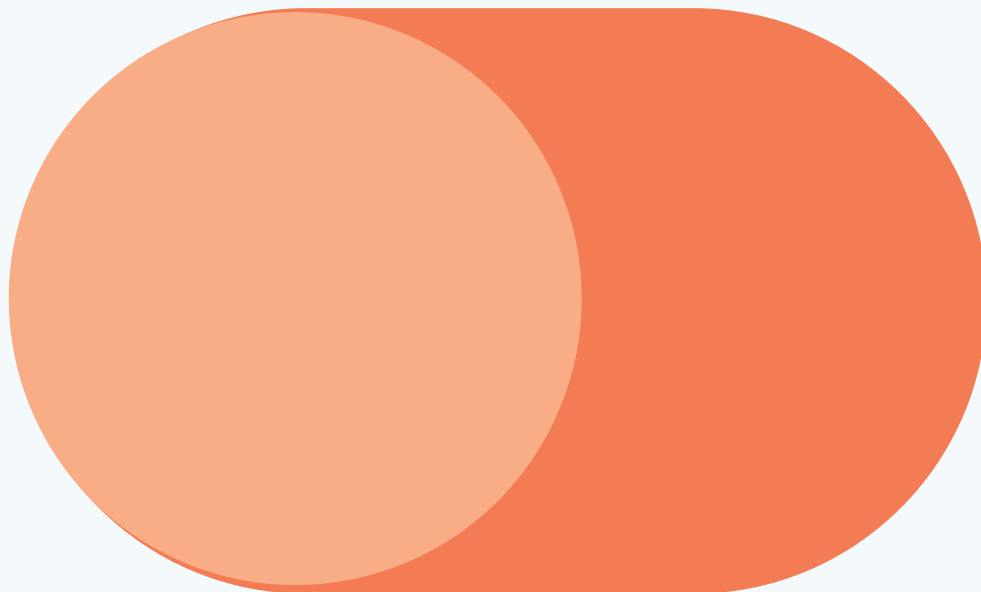
Supporting international higher education

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Introduction

Quality assurance comes in diverse forms and can serve many purposes. Regardless of the purpose, quality assurance activities need to fit the purpose of their specific context (ESG, 2015).

During the past two decades the quality assurance landscape in Europe has undergone major changes and has been a dynamic area with a widening scope that includes not only teaching and research but often also internationalisation and entrepreneurship (Bologna Process Implementation Report, 2015). In parallel, higher education has undergone dramatic changes, such as the implementation of the Bologna three-cycle degree, shift toward student-centred learning, development of international activities and digitally enhanced teaching and learning, to name but a few (Bologna Implementation Report, 2018). In this context, increasing internationalisation has been one of the key changes to improve and ensure quality in the higher education landscape.

This article explores how quality assurance could ensure its fitness for purpose in this increasingly international environment by itself becoming more international. In addition, to underpin the arguments made, it includes some lessons learnt by one quality assurance agency, EUA's Institutional Evaluation Programme, that has the international dimension at the core of its philosophy.

Increasingly international higher education

In the past 20 years the European higher education institutions have become increasingly international. The European Higher Education Area (EHEA), the changes in the higher education policy landscape, the expansion of the European Union (EU), and the EU programmes such as Erasmus+ and Horizon 2020 have been among the key drivers for this development.

The European University Association's (EUA) Trends 2010 and 2015 studies found that the most important developments that shaped institutional strategy were the Bologna Process, quality assurance reforms, and internationalisation: their order of importance varied in these two studies, but the top three developments remained the same in both (Sursock and Smidt, 2010; Sursock, 2015). The first decade of the 2000s was marked by higher education institutions becoming much more connected – through regional, national and international networks and partnerships – with diverse stakeholders and other higher education institutions (Sursock and Smidt, 2010). Furthermore, there was a great deal of stability regarding the importance of global competition and international cooperation. In both 2010 and 2015 Trends surveys, 53% of institutions considered the “enhanced cooperation with other higher education

institutions” and the “competition with other higher education institutions” as highly important.

A 2020 EUA study that surveyed 219 higher education institutions from 34 systems across Europe, showed that the most common internationalisation activities that the respondents engaged in are student credit mobility (95%), EU research projects (91%), staff mobility (90%), attracting international degree students (80%), and joint degree programmes (77%). The top three priorities for internationalisation are enhancing the quality of learning and teaching through internationalisation (68%), attracting students from abroad (68%), and developing strategic partnerships with a selected number of higher education institutions abroad (65%) (Claeys-Kulik et al., 2020). The link between enhancing the quality of learning and teaching and internationalisation was apparent also in the Trends 2018 study. It showed that the most frequently mentioned element in the institutional learning and teaching strategies, mentioned in 87% of the strategies, was “providing international opportunities” (Gaebel and Zhang, 2018).

The European Universities Initiative, launched by the European Commission in 2018, further emphasises the role of international cooperation in driving quality improvement and competitiveness of higher education. Seventy-five percent of the responding institutions to the EUA 2020 survey indicated that the benefit they expected the most from participating in the European Universities Initiative is “enhancing the quality of learning and teaching” (Claeys-Kulik et al., 2020). The interconnection between internationalised higher education and good quality provision thus appears to be gaining ground (Taalas et al., 2020).

For external quality assurance systems, which are currently largely nationally based, internationalisation may, however, pose a challenge. The European University Alliances selected in the first application round have indeed already indicated that among the challenges that they encounter are quality assurance criteria and arrangements.

Internationalisation of quality assurance

Like with higher education in general, international cooperation in quality assurance has a long tradition. The establishment of ENQA has been considered of crucial importance in strengthening quality assurance in Europe by promoting exchange of information and good practice and by carrying out joint projects among quality assurance agencies (Crozier et al., 2010). The adoption of the Standards and Guidelines in Quality Assurance in the European Higher Education Area (ESG) in 2005 gave further impetus for the European dimension in quality assurance.

The ESG provide a framework that allows exchange and transparency between agencies and other stakeholders. It has been argued that implementing the ESG means that an international mentality is applied to quality assurance approaches and procedures regardless of where they are conducted (Grifoll et al., 2015). However, implementing the ESG does not automatically mean that the agencies apply an international philosophy in their processes.

The Bologna Process Implementation Reports use the following four indicators to evaluate the level of international participation in external quality assurance: 1) agencies are members or affiliates of ENQA; 2) international peers/experts participate in governance of national quality assurance bodies; 3) international peers/experts participate as members/observers in evaluation teams; 4) international peers/experts participate in follow-up procedures. The 2018 Bologna Process Implementation Report notes a trend towards greater internationalisation in quality assurance in countries where this had not been previously the case. Furthermore, compared with the previous report from 2015, the number of countries where all four criteria for internationalisation set out for agencies were met had increased from 11 to 15. This is still not a lot, when considering that the report covered 48 countries.

In the policy discourse much attention has been given to cross-border external quality assurance activity and the external quality assurance of joint programmes.

While cross-border quality assurance was mentioned as one of the rationales behind the establishment of the European Quality Assurance Register for Higher Education (EQAR), the Bucharest Ministerial Communiqué in 2012 marked a turning point for the discussions in this regard. In the Communiqué, the ministers committed to “allow EQAR-registered agencies to perform their activities across the EHEA, while complying with national requirements.” According to EQAR website in July 2020, higher education institutions in 19 countries can choose from the EQAR-listed agencies to fulfil their national external quality assurance requirements (Cross-Border Quality Assurance - EQAR, 2020). But in most of these countries there are important conditions or restrictions to be considered. EQAR statistics further show that the total number of cross-border external quality assurance activities carried out by EQAR registered agencies has remained relatively stable since 2016, constituting six to eight percent of the activities of agencies active across borders (EQAR, 2020).

Similarly, limited progress has been made in implementing the European Approach for Quality Assurance of Joint Programmes, which was adopted in 2015. In 14 countries higher education institutions can take advantage of the flexibility offered by the Approach. In most of these countries external quality

IEP is not rooted in any single specific higher education system

assurance is focused on examining institutional quality assurance arrangements and thus they were not the primary target of the Approach because it was developed to resolve challenges encountered in systems with programme accreditation. In 15 countries European Approach is available to some higher education institutions or only under specific conditions, and in 19 countries it is not available (National implementation - EQAR, 2020).

The availability of the European Approach is of particular interest to the European University Alliances, which are expected to develop joint programmes that would lead to students being able to “design their own flexible curricula, leading to a European degree” (European Commission, 2020a). The joint programmes in the context of international higher education serve as an example of how external quality assurance needs to become international in nature in order to remain fit-for purpose in the shifting higher education landscape.

The case of EUA’s Institutional Evaluation Programme

EUA’s Institutional Evaluation Programme (IEP) is an ENQA member, listed in EQAR, that conducts evaluations primarily across the EHEA, but also beyond. IEP is not rooted in any single specific higher education system and it carries out only cross-border quality assurance activities. Its voluntary institutional evaluations use a methodology that has proven to be transferable and context sensitive.

The IEP evaluation teams consist of international experts coming from different countries. The teams do not include members from the country where the evaluated institution is located. This has been considered necessary to provide international perspectives to the development of institutions and to ensure that the team members are not personally or institutionally involved in the evaluated institution (Amaral et al., 2008). Despite the fact that all the experts are international, evidence shows they capture accurately the system-level features

and bring an additional value to the institutions by referring to European policies and practices, and by addressing the feasibility of these policies and practices for the individual institution (Dakovic and Loukkola, 2016). This confirms that the goal of widening the perspective on the development and implementation of policies, management, processes and activities, that underpins the involvement of international experts, can be reached and serves as a counter-argument for those that have questioned the ability of international experts to familiarise themselves with the regulatory framework, context and customs of the “target” country.

In reference to value added by a cross-border quality assurance discussed above, Dakovic and Gover (2019) found that among the most important reasons for signing up for an IEP evaluation, institutions indicated the external and European viewpoint offered by the evaluation. In other words, the institutions signing up to take part in an IEP evaluation found that the European perspective offered by IEP evaluations was of an added-value on its own.

The same study also identified that the areas of institutional activity in which IEP had the most impact were governance and decision-making, quality culture and internationalisation. The data showed that IEP evaluations served as a trigger and accelerator with regards to mobility opportunities for staff and students and development of “internationalisation at home”. Similarly, another study that analysed the topics addressed by the experts in the IEP reports found that regarding internationalisation, three topics were most frequently mentioned: strategy, mobility, and foreign language provision (Cirlan and Gover, 2019).

The international philosophy is at the core of IEP evaluations. The evidence shows that this is one of the areas where they are most impactful. This is one of the reasons why IEP started a couple of years ago to also offer evaluations with a special focus on internationalisation. These evaluations pay special attention to the policies, structures and processes in place for supporting internationalisation at the institution. Besides looking at processes specifically designed to support internationalisation, they explore how internationalisation is mainstreamed throughout the institution. However, there have not been many institutions that have opted for this type of evaluation. The reason could be that the higher education institutions have gained experience and expertise through the years and therefore do not have a strong need for such a focus while their current needs could be fulfilled by the regular IEP evaluation.

Conclusions and reflections

The Covid-19 crisis in 2020 has put a halt to many international activities and made the higher education community question the future of international

collaboration in the sector. The resounding response from EUA members has, however, been that most remain even more committed to the ideal of internationalisation being at the core of academic ethos in higher education. Similarly, the survey conducted by the European Commission on the impact of Covid-19 on the European Universities shows that higher education institutions remain even more committed to be part of a European University as this cooperation supported them to better cope with the challenges of the crisis (European Commission, 2020b).


The commitment of internationalised higher education needs to be reflected in the external quality assurance approaches. The example of IEP is a testament that international quality assurance can bring added value to higher education institutions that seek out-of-the-box ideas, and a genuine external and international perspective. Yet, the core of external quality assurance processes remains largely nationally based, even if the ESG provide a European and thus an international framework.

Data indicates that the progress in the use of cross-border quality assurance has remained modest, and currently it seems unlikely that it will become a widespread phenomenon. However, when a higher education institution is internationally oriented, it would surely benefit from an international external quality assurance approach. To make such an approach more accessible for a wider variety of institutions, it might be more beneficial to shift the focus from cross-border quality assurance to the national agencies. This would mean they would need to embrace internationalisation through their own governance, policies, procedures, criteria, and experts they work with to a larger extent than that which is being done now.

By now, in many European countries there have been several cycles of external quality assurance exercises and this has brought with it the demand to do something new and innovative. Taking the international dimension of external quality assurance to a new level could provide one path forward. This will, however, require willingness to do so by all parties. Not only quality assurance agencies, but importantly the governments in charge of setting up legislative frameworks. These frameworks should encourage and enable the implementation of international perspective as a means to increase the credibility and the fitness-for-purpose of the external quality assurance and higher education institutions.

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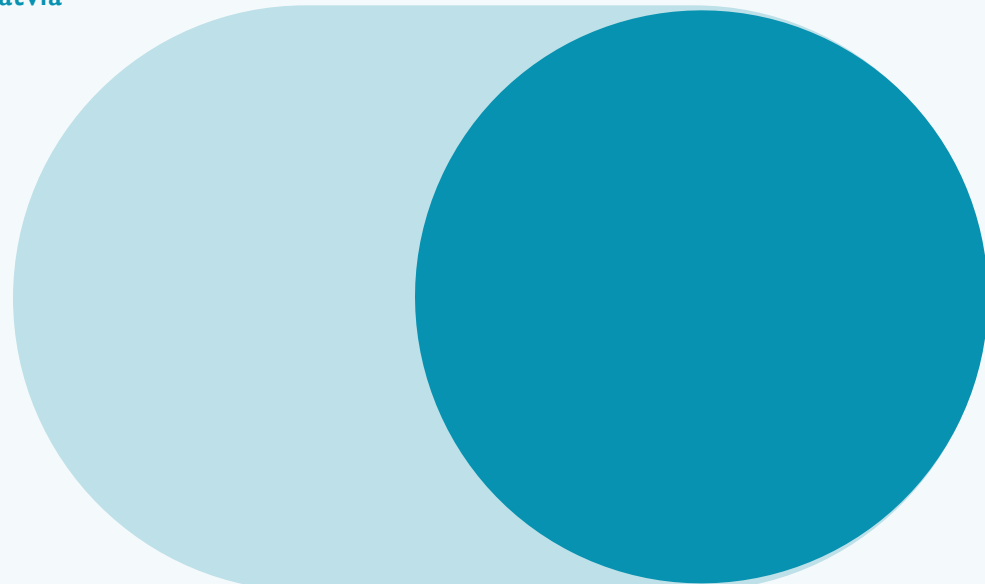
Impact of ENQA on the development of a national quality assurance system and a quality assurance agency: the Latvian perspective

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Awareness is the beginning of change

The quality assurance system in Latvia was established in the early 1990s, with the first quality assurance agency established in 1994. These processes took place well before the signing of the Bologna declaration in 1999, which defined quality assurance of higher education as one of the cornerstones of the European Higher Education Area (EHEA). Soon after that, in 2000, ENQA (back then the European Network for Quality Assurance in Higher Education) was established to promote European cooperation in the field of quality assurance in higher education (ENQA, 2020). In 2001 the EHEA Ministers called upon the universities and other higher education institutions, national agencies and ENQA, in cooperation with corresponding bodies from countries which were not represented in ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice (Bologna Process, 2001). The first Latvian agency for quality assurance in higher education (HEQEC) was established in 1994 and became fully operational and took on the responsibility for quality assurance two years later, in 1996. HEQEC was a non-profit foundation. It was governed by a Board appointed by the Council. The Council was composed of 12 members representing different higher education stakeholders, including five higher education institutions, and the Board members were also delegated by the higher education institutions.

HEQEC did not have a permanent status in the Latvian law. HEQEC performed its duties according to a terminable agreement with the Ministry of Education and Science. It did not have any state funding, only the assessment fees paid by the higher education institutions and modest income from some international projects. HEQEC operated in a very unstable environment. Since regaining independence in 1991, the Latvian higher education system had faced a massive number of different changes – from conceptual changes to constant changes to the regulatory framework. Changes to the higher education system were often sudden and not well discussed in advance, and therefore critically perceived and opposed by the higher education community. They followed each other and took often place in parallel, without being interlinked. Starting from 2011, the higher education institutions underwent a massive external quality assessment which ended with public statements made by high-level authorities about the insufficient quality of higher education in Latvia. In 2012, a new quality assurance system was introduced – to some extent based on the lessons learned in the past, but not completely. In parallel to this, in 2012 the contract of HEQEC to perform quality assessment procedures was terminated and the Ministry of Education and Science took over the responsibility for quality assurance in higher education.

One of the signals for systemic change was the unsuccessful external review of HEQEC against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) in 2010. HEQEC was found to be fully compliant with only 2 out of 8 criteria. ENQA highlighted the financial instability of HEQEC and pointed out that financial stability influences other areas of activity – strategic planning, international cooperation and others (ENQA, 2011). This was taken as one of the starting points for building a new system.

In light of these changes, the creation of an independent national quality assurance agency that could become a member of ENQA was more than a formal fact; it was a way of renewing trust in the Latvian higher education system and regaining trust from the higher education institutions towards the authorities in charge of it.

Impact of ENQA on the development of the Latvian agency

Although Latvia was one of the Bologna Process countries that created a national higher education quality assurance system already in 1990s, both in early years of HEQEC and also until 2015 there were separate elements of a quality assurance system, and it could not be called a complete system that fully complied with the requirements of the ESG.

One of the crucial aspects in building a new system was establishing a common understanding of how it was to look like and what exactly had to be achieved. In this, the role of ENQA and the European Quality Assurance Register (EQAR) – as the official interpreters of the ESG – was very important.

In the process of developing a new national quality assurance agency, ENQA was seen as the source of the most credible information and all ENQA members as role models for compliance with the ESG. Often those from the outside are listened to and perceived more seriously than the people inside the system. This sometimes was the case also when building the current Latvian agency, the Quality Agency for Higher Education (AIKA). ENQA

ENQA was seen as the source of the most credible information ●

was personified through its representatives spreading the message of meaningful and supportive quality assurance and the spirit of the Bologna commitments of the EHEA member states.

The example of neighbouring countries played a catalyst role in the efforts to develop faster. In both Estonia and Lithuania, the national quality assurance agencies were established in the 1990s (SKVC in 1995 and EKKA (then Estonian Higher Education Accreditation Centre) in 1997.) They were already experienced and mature and accepted by the European quality assurance community with SKVC becoming a member of ENQA in 2012 and EKKA in 2013. There was a feeling of lagging behind in the Latvian higher education community and a belief that when AIKA becomes a member of ENQA, it will finally have credibility and a voice in the European quality assurance community. Case studies from ENQA member agencies were used to develop the concept of improvement of the Latvian higher education external quality assurance system, which was adopted by the Latvian Cabinet of Ministers in 2014 (Cabinet of Ministers, 2014).

The concept highlighted the main challenges: administrative burden (requirements overlapping between several procedures, significant amount of reporting); accessibility of information (reliable information on accreditation results); effectiveness (fitness for purpose, aligned process management); transparency (clear and streamlined procedures, expert selection and training, well-grounded and interpreted decisions); regulatory burden (legal framework is fragmented); governance (lack of unified process management; monitoring (ongoing monitoring mechanism); lack of systemic approach; and long-term action due to the lack of funding.

The issues that were not in line with ESG were the result of fragmented changes to the higher education system: amendments to the legal framework that were not aligned with each other, actions that were taken in a hurry to ensure the continuity of processes but not necessarily better quality of execution, and systemic lack of funding.

The national commitments resulting from the Bologna declaration and compliance with the ESG were often used as the main arguments by policy makers to call for changes. The risk of not becoming an ENQA member was used to argue against changes that would jeopardise an independent and stable quality assurance system and agency.

A lot was changed with the establishment of the new Latvian agency: the governance system of the agency, the composition and selection procedure of the decision-making body, the financing model and the amount of state financing, the assessment criteria and methodology, the process for expert selection and training, and the support services provided to the higher

education institutions. Although becoming a member of ENQA was not the main reason for introducing all the changes, over the time both things became connected and the goal of becoming a member of ENQA was often named among the reasons for introducing a certain change.

Among the first changes, AIKA addressed the deficiencies that were identified in the ENQA review of the former quality assurance agency, HEQEC.

The lack of independence was solved by a completely new structure with newly established and separated strategic management and decision-making bodies that are independent from the Ministry of Education and Science and include different stakeholders in an equal manner. One of the first tasks of the new agency was the formulation of the mission statement, principles and values, and the development of an internal quality assurance system and a strategic plan – elements that were almost non-existent in the previous system. The instability of funding and dependence on the fees collected from the higher education institutions was solved by stable funding from the state complemented by income from fees and projects. A lot of effort was devoted to the selection, training and support of the review experts in ensuring objectivity and consistency of the reviews, and full ownership of the review reports by the agency. Special importance was paid to the capacity of the agency as an organisation, including the number and competence of the staff members, and the support services provided to the higher education community. Some of these elements had existed before but now they were taken to a new level, ensuring full compliance with the ESG, and supported by implementation of the very best examples from other countries and agencies.

There was often uncertainty about the interpretation of the ESG. It is our assumption that the two roles of ENQA – the gatekeeper for compliance with ESG and the coordinator of reviews for compliance with ESG – decreases the openness of agencies about their deficiencies. This was sometimes confusing for AIKA and could be true for many new agencies undergoing their first review, until their confidence increases. Another fear was the effect of compliance statements made on other agencies – the perception that if another agency is doing something and is compliant with the ESG, the others have to do exactly the same in order to be compliant.

The changes became more frequent when AIKA received additional funding from the European Social Fund with the condition of becoming listed on EQAR and undergoing a review by ENQA. The timeline of the project implied a certain moment when AIKA had to be assessed by ENQA and become listed on EQAR. Without the timeline implied by the funding, the changes would still have been implemented but possibly over a longer time period.

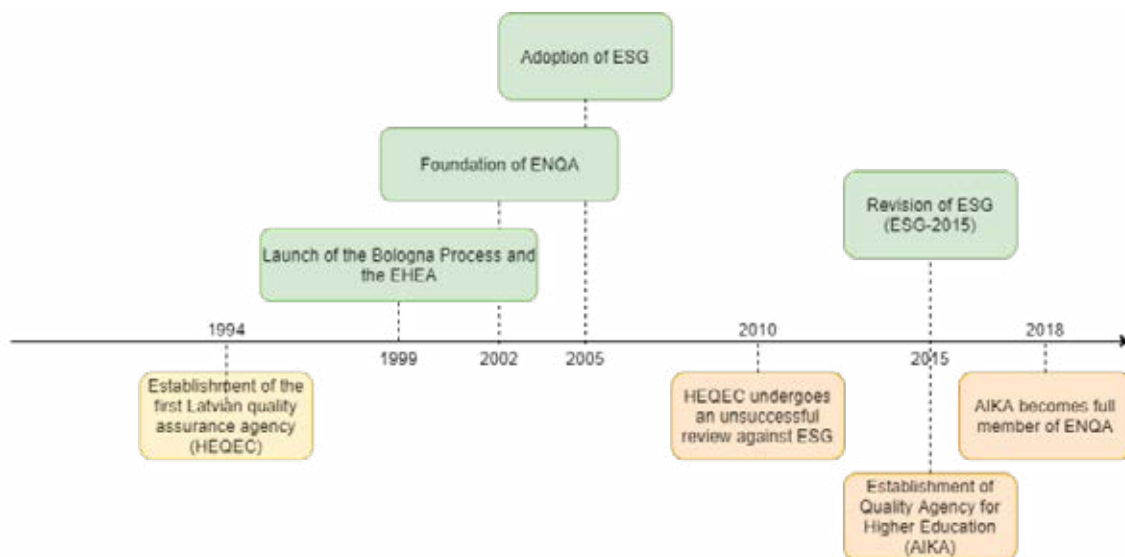


Illustration 1: Milestones in higher education quality assurance in Latvia and Europe

Since its establishment in 2015, and especially since 2018 when AIKA became a member of ENQA, AIKA has been praised for its very fast development. AIKA as a new agency is very open to new opportunities, cooperation proposals and more receptive towards external events than perhaps quality assurance agencies coming from an old and stable environment.

AIKA strives to be a national leader in developing and promoting new initiatives in higher education and quality assurance and the experience and contacts gained through ENQA are crucial in doing so.

Conclusions: possible impact of ENQA in the future

Judging from AIKA's experience, ENQA must have played a very important role especially for those countries who did not have an ESG compliant quality assurance agency and were striving to establish one. New organisations are often the most vulnerable ones. In a bureaucratic system it is easy to either make changes only because changes have to be made, or design an ideal system and defend it until it becomes unrecognisable. Many new organisations in existing systems do not have enough confidence and power to go their own way and rather choose to follow in the footsteps of what has already been done.

The guidance and expertise by ENQA are crucial in establishing ESG compliant national quality assurance systems. For countries with a changing political situation, the support by ENQA (and the name of ENQA) has helped to develop systems and push for positive changes. ENQA has had a great influence on the existence of the Latvian external quality assurance system in several ways. First of all, as a catalyst for change after

the negative review outcome for HEQEC. In addition, ENQA has been a change manager, carrying the flag of international recognition of quality assurance agencies and convincing higher education authorities across the EHEA that becoming a member of ENQA gives credibility to a quality assurance agency. ENQA has also provided support in clarifying the ESG requirements, advocated for new developments and improvement, and has created and maintained a platform for communication and exchange of experience with peers in the EHEA.

Becoming a member of ENQA has definitely improved the credibility of AIKA. Although there are countries where the membership of ENQA is not considered crucial for the national agency, the majority of the EHEA quality assurance agencies, especially those with a mandate at the national level, strive to become members of ENQA.

The support of ENQA is invaluable when dealing with issues that have not existed before and when providing the services that the quality assurance agencies separately cannot afford or cannot organise resource-wise, for example, international staff development programmes or surveys on the practices of other agencies. ENQA is in the best position to provide capacity building services for those agencies who do not have sufficient resources or know-how to develop further and those who are at their starting point.

The ENQA external review report highlights three possible strategies for future development: ENQA as a gatekeeper, ENQA as a club for members and ENQA as an enterprise (NIFU, 2019). We see an enormous potential in ENQA as a gatekeeper for credible quality assurance agencies and as a network of members where every member finds the support that it needs the most.

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Development and impact of a quality assurance system:

a view from Croatia

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Introduction

The development of a quality assurance system in higher education has had significant implications for the entire system of higher education and science in Croatia. It encouraged and reflected a number of institutional and system-level changes that have taken place over a twenty-year period. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) have played a crucial role in these developments. As the ESG introduced a harmonised dimension of external evaluation in Europe, it was of considerable importance that Croatia would join in. By taking over the concept of the European dimension of quality assurance promoted by the European Association for Quality Assurance in Higher Education (ENQA) and supplementing them with specific features of the Croatian higher education system, the Agency for Science and Higher Education (ASHE) developed external evaluation procedures that have become an influential mechanism for raising the quality of national tertiary education.

This review includes the development of the quality assurance system in Croatia, a description of its current specific features in a broader context, and its impact on the national system of higher education and science.

Development of a quality assurance system

The quality assurance system in Croatia, as in other Central and Eastern European countries, takes place in a complex and rapidly changing environment. On the one hand, it is developing as part of an independent higher education system in a relatively young country, and on the other, as one of the mechanisms of integration into the European processes, it is a part of global trends in higher education.

The first activities that the Croatian higher education institutions undertook in terms of external quality evaluation were the self-evaluations that institutions conducted in 2000. They were drawn up for the needs of external evaluation by the European University Association (EUA) (Currie et al., 2005). In the 2005 evaluation reports of all seven public Croatian universities, EUA evaluators suggested that the care for the quality of teaching and research should be continuous and expressed the imperative of measuring the quality of achievements and outputs. Although at that time a functional system of quality assurance and external evaluation had not yet been established, the need for its use and its potential benefits were already the subject of numerous discussions and relevant documents in Croatian higher education.

The quality assurance system was introduced in Croatia in 2002, as part of the implementation of

the objectives of the Bologna Process. The obligation to implement all objectives (adoption of a system of easily recognisable and comparable degrees, adoption of an education system divided into three cycles, introduction of the ECTS credit system, promotion of student and teacher mobility, increasing the quality of higher education and promoting the European dimension in higher education) has caused significant changes at the policy level as well, in terms of new legislation that enabled the reorganisation of studies into a three-cycle model and the introduction of the ECTS system. The introduction of a quality assurance system took place in parallel with these processes. In the first phase, the system relied on initial accreditation of study programmes and accreditation of the existing study programmes that had been redesigned to meet the goals of the Bologna Process.

During 2005 and 2009, all study programmes in Croatia were accredited and redesigned in three-cycle programmes. External evaluations were conducted by the National Council for Higher Education and included minimum external evaluation standards for the purpose of issuing a license, and other indicators of the quality of study programmes, research activities and institutional governance, primarily related to the dedicated spending of financial resources. Evaluation results were published in the form of a report.

Higher education, along with other segments of society, progressively opened to various forms of private initiatives. The legal framework enabled the opening of the first private higher education institutions, resulting in their further proliferation. At the same time, public higher education institutions introduced several market-oriented mechanisms, creating a large number of new study programmes, especially at the postgraduate level. The goal of quality assurance schemes during this period was to identify programmes that did not meet the set criteria, which were primarily quantitative and referred to the number of teaching staff appointed to certain teaching-scientific grades, and to the amount of space available (Dobbins & Leišyte, 2014).

After 2009, the initially established quality system, which focused on minimum conditions, underwent changes: quality assessment mechanisms, based primarily on the ESG and quality dimensions that included internal quality assurance, and programme and research quality assessment, were introduced at this point. A strong government policy towards the role of quality in higher education and science resulted in ASHE (established in 2005) succeeding the external quality assurance competences of the National Council for Higher Education. The Act on Quality Assurance in Higher Education strengthened ASHE's independence and its position within the national context as the only national body in charge of external evaluations in higher education and science.

External evaluation tools in Croatia

In the Croatian quality assurance framework, external evaluations include several processes – initial accreditation, re-accreditation, audit, and thematic evaluation. Initial accreditation, re-accreditation and audit are carried out in 5-year cycles and are currently in their second cycle. The first cycle of re-accreditation in higher education, conducted in 2010-2016, included all higher education institutions, regardless of their type. Re-accreditation is a systematic evaluation exercise, based on criteria aligned with the ESG. Meeting the minimum academic requirements, mostly of a quantitative nature, and evaluating and monitoring quality improvements, were the primary evaluation objectives in the first cycle.

External quality evaluation procedures at the national level have a scope that goes beyond just quality assurance. Considering the lack of national level data available to policy makers, researchers and other system users, there is a need for a comprehensive system-wide analysis that would provide public data on higher education institutions, study programmes and evaluation outcomes. In this context, ASHE's system-wide analysis responds to the need for systematic data collection on higher education institutions and their programmes, which has not existed so far. Moreover, publication and analysis of relevant institutional data through an outline of evaluation results is a far-reaching exercise identifying strengths and weaknesses complemented with policy recommendations.

The analysis of the first cycle provided guidelines for the scope, focus and evaluation criteria of the second cycle. The new cycle is focused on further improvements of institutional quality, student-centred learning, learning outcomes, and community outreach. Its introduction coincided with the new, revised ESG (2015), whose implementation has in this context been facilitated.

Although the previous version of the ESG did not cover quality assurance of research and other institutional activities, these were already implemented in the first-cycle evaluations in Croatia, as evaluating research activity is one of ASHE's core activities. Furthermore, the new cycle also aims at expanding the quantity and quality of the scientific production by institutions, and increasing their international recognition, given that these shortcomings were identified at the majority of Croatian institutions.

In addition to focusing on institutional quality enhancement, the number of evaluation criteria was reduced, as was the bureaucratic burden for the institutions. Changes in administration of the evaluation process enabled higher education institutions to submit the required quantitative data into the interactive MOZVAG

system, from which it is possible to run data analyses at the institutional or national level. The purposefulness of MOZVAG for systematic data collection is crucial for system-wide analysis and thematic evaluations.

Implementing the EU funded project “Improvement of quality assurance and enhancement systems in higher education”

After analysing the first 5-year cycle of external evaluations in Croatia, as well as stakeholders' feedback, ASHE implemented a 5-year SKAZVO project (*Improvement of quality assurance and enhancement systems in higher education*), co-funded by the European Social Fund. The purpose of the project was to develop new procedures for the external evaluation of Croatian higher education institutions and study programmes, and to improve the existing ones, as well as to enhance the quality of study programmes and strengthen the competences of staff at higher education institutions. Through this project, new activities were introduced regarding data collection, informing the general public about higher education, and developing counselling services for current and prospective students. During this project, seven institutions underwent a pilot re-accreditation for the second 5-year evaluation cycle, 47 institutions were re-accredited within the second 5-year evaluation cycle, and 114 doctoral study programmes underwent re-accreditation of postgraduate study programmes. In addition, 72 workshops on various topics have been organised within the project so far (including on the ESG, quality assurance, internationalisation, learning outcomes, improvement of the MOZVAG and CROSB I systems, professionalisation, meetings of the National Network of Quality Assurance Units at Higher Education Institutions (CroQAnet), training of panel members for external evaluation procedures, workshops on writing self-evaluation reports, workshops for students, etc.). These have been attended by a total of 1434 participants, of which 1270 were representatives of institutions and 164 were representatives of students.

Informing the public about the quality in higher education

Informing the public about the external evaluation procedures and their results is an essential task of quality assurance. Accordingly, ASHE developed a communication strategy with the main communication goals being the promotion of quality culture in science and higher education as a widely-accepted value and raising public awareness of quality culture's multifaceted importance for the development of higher education institutions and scientific institutions. This included their recognition, visibility, comparability and relevance at the national and

The activities of science and higher education are inseparable and are thus embedded jointly

international levels, but also their importance for the economy and society as a whole – primarily for students and pupils, as direct users that are educated to join the labour market. (ASHE, 2019: 3).

In fulfilling this goal, ASHE uses various channels to reach its different target audiences: higher education institutions (universities and university constituents, polytechnics and colleges), scientific organisations, members of the academic and scientific community, policy-makers, international organisations of which ASHE is member, foreign higher education institutions, members of expert committees, high school students, students and their parents, the media, and other interested individuals or entities. The main communication channel is ASHE's website, but other means of communication are also used, like social networks, printed publications, brochures and leaflets, promotional videos, presenting ASHE's activities at conferences and symposia, organisation of various conferences and training events for representatives of higher education institutions, and communication with the media.

ASHE's official website (www.azvo.hr) in Croatian and English is regularly updated with news from ASHE and from Croatian higher education institutions, as well as information on activities carried out by international organisations such as ENQA and EQAR (the European Quality Assurance Register for Higher Education). It also contains detailed descriptions of all external evaluation procedures, and annual plans of institutional re-accreditation, re-accreditation of doctoral studies, and audits. ASHE's homepage also provides a link to the Database of Evaluation Outcomes, a main source of information about the quality of higher education institutions in Croatia, containing all reports, recommendations, and other relevant documents related to the evaluation procedures. The Database is linked to the European Database of External Quality Assurance Results (DEQAR) that contains reports and decisions resulting from the evaluation of higher education institutions carried out by quality assurance agencies listed on EQAR.

Characteristics of the Croatian QA system - quality assurance of scientific activity

A specific feature of the Croatian quality assurance system is the external evaluation of the quality of scientific activity at the level of institutions – higher education institutions, especially those that deliver doctoral

programmes, public and private scientific institutes, and various institutions that carry out scientific research. Although the ESG are not applied to this type of institutional activities, ASHE strives to implement the standards in the evaluations it conducts.

The activities of science and higher education are inseparable and are thus embedded jointly into the Croatian legislative and practical framework.

A tailored methodology is applied in the evaluation of scientific activity of organisations, such as research institutes, that do not officially have teaching activities (even though their employees often teach at higher education institutions). Public research institutes, specific to this part of Europe, are independent research entities, not integrated with universities, having an exclusively research role. The evaluation of these institutes was launched as a policy initiative aimed at examining the possibility of merging the institutes with public universities, or with each other. For these purposes, ASHE developed a customised evaluation methodology that includes internal quality assurance, which – up until that point – had not been systematically implemented at institutes.

The evaluation of doctoral studies was conducted for 114 programmes in all scientific fields. The evaluation methodology included checking the capacity and resources allocated to doctoral programmes, the internal system of quality assurance of doctoral studies, support for doctoral students and their progress, and finally, the outcomes of the study programme. The analysis of the results of these evaluations showed significant differences between disciplines in the manner of implementation of doctoral studies. Student support and internal quality assurance are the best rated areas, and qualitative analysis has shown that additional efforts are needed with regard to monitoring the progress of supervisors and candidates, introducing an international dimension to research, improving funding, and reducing dropout rates. The outcomes and impacts of these evaluations have led to the improvement of their quality and the development of new methodologies for quality evaluation in science (Loukkola & Zhang, 2010).

Impact of procedures on higher education institutions and the higher education system

The short-term impact of all evaluation procedures is measured and analysed via a questionnaire that is sent to

all three groups of participants in the process – higher education institutions, foreign experts and national members of expert committees. Results indicate that higher education institutions (mostly the management staff) are satisfied with the external evaluation procedures, stating that external evaluations provide support to the culture of quality and management of higher education institutions. Short-term impact analyses are conducted after each evaluation, while a broader analysis is carried out upon the completion of the 5-year evaluation cycle (for re-accreditation and audit). Extensive analysis of the impact on institutions showed that the management see the most benefits from external evaluations, followed by teachers and researchers, and, to a lesser extent, non-teaching staff. In short, the introduction of external quality evaluation procedures in line with the ESG at higher education institutions lead to positive changes at the institutional and system level.

The long-term impact of external evaluation is mostly reflected in changes in the system of higher education and science. Evaluations that eliminated institutions and study programmes that did not meet the minimum criteria from the system and introduced the necessary changes for quality improvement, significantly contributed to the quality enhancement of institutions. Moreover, the introduction of the ESG as the main framework for external evaluation schemes facilitated the Europeanisation of the national system (Hauptman Komotar, 2018) and harmonisation of institutional quality with global standards. Apart from the clear impact of the evaluation criteria structure based on the ESG, ASHE also noted the consequential effect of peer-review: reviewer teams have an impact on the transformation of institutions, as well as on the evaluation system and public policies. Their recommendations that call for a revision of existing policies and practices in the system of higher education can also be implemented at the supra-institutional level. They are summarised in a system-wide analysis addressing the recommendations to main stakeholders (ASHE, 2017).

Concluding remarks

In the context of the beginning and further development of the quality assurance system, and the development and application of external evaluation methodologies in Croatian higher education and science, the adequate implementation of the ESG and membership in ENQA had essential importance. The application of standards has led to the opening, improvement and modernisation of the national system according to the needs of contemporary higher education. The legal framework adopted in 2009, which established that the application of the ESG and ENQA membership are requirements that the national quality assurance system must fulfil, has led to significant changes in terms of external evaluations and their usefulness. The benefits derived from the evaluation and unified approach to quality assurance are the

most substantial of all reform mechanisms in Croatian education in the past thirty years, resulting in better integration of the national higher education system with the European framework, internationalisation of the system and institutions (due to international expert panels, among other things), quality improvement, and, ultimately, adjustments of public policies to facilitate the quality enhancement of institutions.

Evaluation cycles coincided with the two versions of the ESG, and as they evolved, the Croatian system also developed. The revision of the ESG in 2015 coincided with the start of a new evaluation cycle, and the new version was thus easily implemented in the new methodology. In the meantime, from the Agency that started only fifteen years ago with the introduction of a quality assurance scheme, ASHE has improved the quality of Croatian higher education and scientific institutions and developed a recognisable role in the European arena.

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Vignettes of two decades of developments in European quality assurance

through the lenses
of Georgia

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1990s: flying from the shadows of the past

In the 1990s, when member states of the European Union (EU) were making the first steps in formalising external quality assurance arrangements, and still very few European quality assurance agencies started sharing their experience with one another (Kauko, 2012), Georgia was going through political turmoil (Dobbins & Khachatryan, 2015: 120) and was emerging as a country restoring its independence and freeing itself from its Soviet past and legacy. This involved the transformation of a centrally controlled, highly hierarchical Soviet structure that was affecting everything, including higher education (Cherkezishvili, Sanikidze and Gibbs, 2020). Saakashvili, the president of Georgia during 2004-2013, highlighted that the late 1990s and early 2000s were characterised by Georgia escaping from the shadows of its past (2006: 68). Similarly, Jibladze described it later that by the end of 1990s, “Georgia turned to the western European countries to search for solutions and inspiration for reshaping post-soviet higher education” (2012: 343). In 1999, Georgia ratified the Lisbon Convention of 1997 as one of the first steps of alignment of Georgia’s education system to the European one. In parallel to this, in the same year, the Bologna Declaration was signed and in 2000, the European Network for Quality Assurance in Higher Education (ENQA) was formed as a European professional network for quality assurance. Initially, there was little awareness in Georgia about ENQA’s role as a future driver of higher education quality assurance. But the formation of the European Higher Education Area (EHEA) later largely defined the direction of the work of ENQA, as well as shaped future directions of developments and reforms in higher education in Georgia.

Early 2000s: choices

ENQA’s establishment as a network in 2000 and as an association in 2004 marked the start of their work to be a driver of quality assurance of higher education, which would have a positive spill-over effect on higher education quality in countries outside the EU, including Georgia. In the early 2000s, when ENQA was taking an active role in contributing to the Bologna Process goals, higher education in Georgia was experiencing a lack of accountability; corruption particularly in university admissions; and the effects of a poor quality assurance system (Orkodashvili, 2010). It was clear that there was a need for radical, sweeping changes to transform the higher education system, so Georgia introduced the Unified National Examinations for university admissions, similar to the SAT in the United States, to root out patronage-based and academically corrupted practices that were hampering the quality of higher education (Rostiasvili, 2011). In 2004, Georgia adopted the Law on Higher Education which came into force in 2005.

This law explicitly stated that one of the primary goals of higher education in Georgia would be the facilitation of internationalisation and democratisation through higher education tasked to develop civil society, which was so much needed (and still is) for the country. For this, the state committed itself to support the European integration of Georgian higher education in teaching, learning, and research. The 2004 Law on Higher Education also obliged universities to establish units that would work on the development of policies and procedures for internal quality assurance. It also underlined participation of academic personnel and students in the management of institutions and in decision-making, thereby taking into account major requirements of the Bologna Process and the ESG 2005. In parallel with the launch of the ESG 2005, Georgia joined the Bologna Process, formally making the choice to be accountable for harmonising its higher education system with the policies of the EHEA. So, in the early 2000s and particularly after 2005, while ENQA was supporting the implementation of the ESG 2005, Georgia chose to initiate large-scale reforms in higher education, which were predominantly influenced by the Bologna Process.

2006-2009: beginnings of European quality assurance in Georgia

Joining the Bologna Process marked the improvement of legal frameworks and quality of higher education system in Georgia. This involved the introduction of a three-cycle degree system, the implementation of a credit system, and most importantly the launch of external quality assurance standards. As a result, an institutional accreditation process was developed and established as a requirement for higher education institutions operating in the country. Institutional accreditations were carried out by the National Center for Educational Accreditation (the predecessor of NCEQE), which was established by the Minister of Education in 2006 and had responsibility for assessing compliance of higher education institutions with the formal quality standards. Initially, the quality assurance system in Georgia was rather input-based and reliant on quantitative indicators. The total number of higher education institutions in Georgia during 2006-2009 was over 300 (in a country with a population of around 4 million). After finalising the first cycle of institutional accreditation, about 70% of these institutions were shut down, as they failed to meet the basic quality assurance requirements.

2010-2018: per aspera ad astra

In 2010, the Law on Education Quality Enhancement established the National Centre for Educational Quality Enhancement (NCEQE), which replaced the former quality assurance authority. The period between 2010-2015 was marked by reflection on the reforms carried

out after Georgia joined the Bologna Process (Darchia, 2013; Jibladze, 2013). The Bologna Follow-up Group (BFUG) stocktaking reports of earlier years highlighted the importance of reforms carried out by Georgia, in terms of structural changes in higher education and in quality assurance particularly due to these changes being in line with the ESG 2005. However, as Jibladze (2013) noted, there were almost no studies conducted on whether these transformations were actually improving the quality of higher education provision. Some even criticised the reforms for being entirely focused on structural changes, rather than on the development of a quality assurance culture in the higher education sector. Thus, 2010-2015 was a period of pitfalls and challenges, but also of opportunities in relation to implementing European quality assurance principles in Georgia. The adoption of the Law on Education Quality Enhancement in 2010, the development of external quality assurance standards and procedures in line with the ESG during 2010-2011, the affiliation of the NCEQE to ENQA in 2013, and Georgia becoming a co-chair of the BFUG also in 2013, were further illustrations of Georgia's efforts to transform its quality assurance system.

Furthermore, in 2014, Georgia signed the Association Agreement with the EU, in which the parties agreed to cooperate on the overall modernisation and reform of Georgia's education sector, while the mid-term priorities were agreed to be "carrying out joint work and exchanges with a view to promoting Georgia's further integration into the European Higher Education Area, in the context of its membership of the Bologna Process; this also included strengthening an independent and development-oriented quality assurance system". The EU-Georgia Association Agreement marked the start of a new exciting era of Europeanisation of Georgia and its alignment with European policies and practices, to which the country had been aspiring since gaining its independence.

In Europe this was followed by the adoption of the ESG 2015, which became the main framework for Georgia to follow in reforming its quality assurance system, in order to make it more student-oriented and to ensure fulfilment of Georgia's responsibilities in relation to the quality of higher education, set out in the Association Agreement. It was not very easy to reach this goal, as some actors in the process had oppositional views on the changes to be introduced. For example, in 2018, when several institutions had undergone institutional evaluations according to the newly revised external quality assurance standards for institutional accreditation, several Members of the Georgian Parliament suggested modifying the legislation thereby postponing further institutional evaluations with revised standards. However, the academic community and experts of higher education spoke up against this proposal by explaining to the Georgian Parliament and the Ministry of Education the negative impact the decision could have

The resources and professional networking opportunities offered by ENQA had a tremendous impact

on the quality assurance system (Erasmus+ National Office of Georgia, 2019). Georgia was fortunate that this legislative initiative was rejected by the Parliament. So, it was due to extraordinary joint efforts made by the NCEQE, quality assurance professionals, students, and employers, as well as institutions and experts from Georgia and from European countries, that the quality assurance mechanisms were reformed in line with the ESG in 2015-2017, and that it was possible to stand against interference regarding their implementation.

The aim of this reform was three-fold. Firstly, the reform aimed at enhancing the quality of higher education provision and promoting student-centeredness; secondly, it aimed at strengthening the development-oriented and outcome-based function of quality assurance; finally, it aimed to ensure the compatibility of the Georgian higher education quality assurance system with the requirements of the ESG, thus meeting the commitments of the Bologna Process and Georgia-EU Association Agreement. The process of revision was accompanied by sending and receiving feedback to and from stakeholders from Georgia as well as international experts. Discussions on the draft documents took place and the NCEQE piloted the revised quality assurance standards and procedures in several higher education institutions. Most importantly, when revising the system, the NCEQE thought it important to keep it anchored in the national context and, in this way, translate the ESG to fit the existing Georgian context, so to influence prior existing policy and practice of quality assurance.

These joint efforts combined with European professional experience and educational background of key players proved to be a success factor of the overall process. Furthermore, the resources and professional networking opportunities offered by ENQA had a tremendous impact on reforming Georgia's quality assurance system, in terms of its modernisation and convergence with

European practices. As such, the period from 2015 onwards was one of intense Europeanisation. This was particularly supported by the dissemination of EU policies and practices within Georgia and translating the experiences of ENQA members to be applied for addressing local problems. In parallel, Georgia gave its own contribution to the development of quality assurance in the EHEA.

2019 – present: the story of how ENQA is bringing Europe to Georgia

By 2019 the National Center for Educational Quality Enhancement of Georgia (NCEQE) had undergone several external evaluations through which its external quality assurance mechanisms were evaluated: by experts funded by the Council of Europe, by the World Federation for Medical Education (WFME), and by ENQA. Recognition of the compatibility of the external quality assurance mechanisms in Georgia with the ESG by ENQA and later by the European Quality Assurance Register for Higher Education (EQAR), was one of the biggest milestones during the last 20 years of developments in higher education quality assurance in Georgia. Through this recognition, the country also met the requirements of the EU-Georgia Association Agreement in terms of alignment with European policies and practice in higher education quality assurance. However, it must be mentioned that it was not the end in itself. Georgia is aware that there will be new challenges to overcome, particularly in terms of the new global context caused by Covid-19. But one thing is really clear: ENQA has played the role of a catalyst in bringing European quality assurance concepts and principles into Georgian higher education, thus contributing to its Europeanisation.

ENQA has clearly become one of the key actors in shaping quality assurance policies in the EHEA and in Georgia. Like the EU-Georgia Association Agreement, ENQA gains importance in political debates in Georgia in relation to the European policy agenda in higher education quality assurance. This can be illustrated by it being quoted by the NCEQE and experts of higher education in recent communications with the Ministry of Education on the necessity of enhancing the level of NCEQE's independence, as the national quality assurance agency, in terms of maintaining its ENQA membership and for meeting mid-term priorities of developing an independent quality assurance system, as set out in the EU-Georgia Association Agreement.

Furthermore, the fulfilment of the recommendations resulting from the ENQA external review of the NCEQE allows the agency to bring in democratic and good governance principles particularly in terms of increasing the role of stakeholders in the management of the NCEQE,

and maintaining organisational integrity, transparency and accountability to the public, and so on. The ESG are disseminated through NCEQE's meetings and communications with institutions and with other stakeholders (including the representatives from the ministry), thus supporting further the Europeanisation. Fulfilment of the recommendations of the ENQA external review is also one of the major components of the EU Twinning project focusing on the human capital development by improving quality assurance of education in Georgia. This project is currently being implemented and further supports capacity building and Europeanisation of the NCEQE.

Finally, the professional networking opportunities provided by ENQA foster long-term relationships, exchange of experiences, and peer learning for NCEQE. These enhance the European dimension of the agency's work, bringing Georgia thus even closer to Europe.

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The future of QA is qualit-AI-tive:

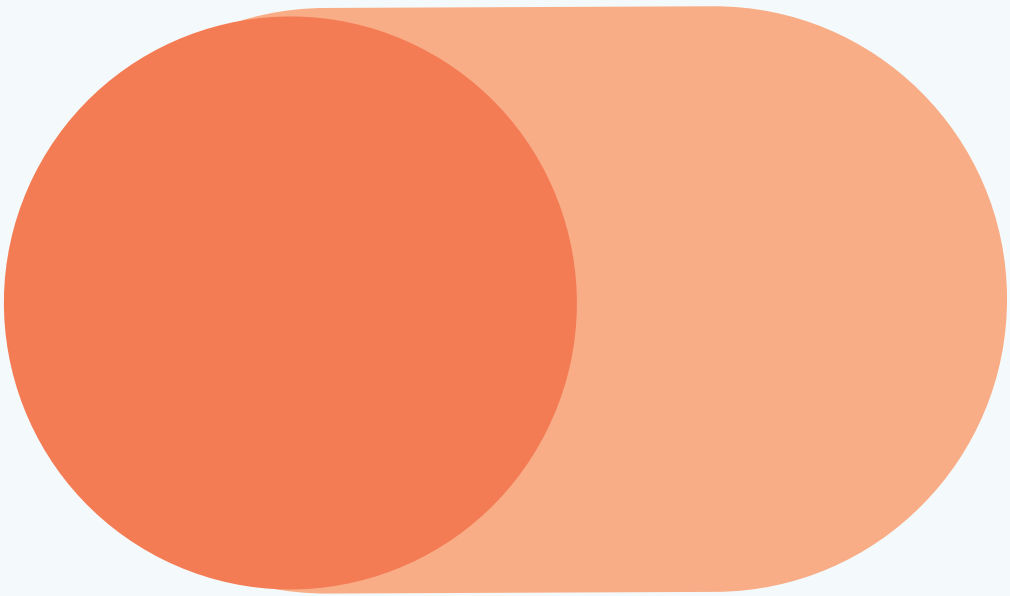
enriching the story of internal QA
development with artificial intelligence

THORSTEN KLIEWE

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Introduction

The phenomena pertaining to quality enhancement, measurement and monitoring have become one of the top priorities in higher education, on both national and institutional levels (Harvey and Williams, 2010; Enders and Westerheijden, 2014; Elken and Stensaker, 2018). According to the Communication on Improving and Modernising Education, “quality education for all is a foundation for social cohesion and an open society” (European Commission, 2016: 2). With the massification and internationalisation of higher education in the past few decades the student body has become vastly heterogeneous, with a large number of non-traditional students entering the system. With this diversification, it has become glaringly obvious that different students have different needs and a one-size-fits-all approach needs to be replaced with more personalised one. Therefore, both in terms of quantity and quality, higher education landscapes are growing more complex, nuanced and multi-faceted. Furthermore, the rise of new public management, decrease in public funding and mushrooming of the private higher education sector all have led to increased competition for the scarce resources (i.e. students, prestige, funding), which in turn led to the greater need for being more accountable and transparent (Smidt, 2015), all the while being more responsive to the needs of students in order to attract and keep them. Against this backdrop of relatively adverse status quo for higher education institutions, there is an evident clear need to focus more intently on quality and more precisely quality culture. The purpose of our paper is to contribute to efforts of forecasting the future of quality assurance in the European Higher Education Area (EHEA) with respect to enhancing the quality assurance mechanisms, instruments and systems and engendering quality culture by enriching the current story. Our core argument is that a qualitative approach to data should take more prominence and it should be leveraged by capitalising on advantages of artificial intelligence (AI). The paper aims to contribute to the current debates in the arena of higher education policy and practice with respect to quality assurance and AI.

With the morphing terrain of higher education and the diversification of the student body, changes are also needed in how we perceive and approach internal quality, as ensuring quality is still a great challenge in many countries (OECD and World Bank, 2007; European Commission, 2017). A copious body of literature suggests that the evaluation of these higher education processes does not portray reliably and accurately the quality of higher education (Pohlentz, 2009; Shevlin et al., 2000; Zhao and Gallant, 2012). One part of the problem lies in the notion that the concept of quality in higher education is not an easy one, and it defies attempts to be properly defined. It is notoriously elusive (Gibson, 1986), relative (Harvey

and Green, 1993), and multidimensional (Campbell and Rozsnyai, 2002) and there is a growing scepticism on the effectiveness of any of the existing quality assurance frameworks and models (Asif, Raouf, and Searcy 2012). The lack of theoretical entrenchment of quality assurance is also something that makes it challenging to engage with. Zeroing in on particularities, often there is an over-emphasis of a quantitative approach, with students filling out closed-ended, Likert-style surveys, year in, year out. These often do not allow students to properly engage with the phenomenon of quality at higher education institutions by constraining their choices. Furthermore, the mechanical practice of circling and ticking the desired answer may seem alienating and too impersonal, thus precluding them from fully and genuinely engaging with quality of their learning experiences and educational offerings. While some level of standardisation and bureaucracy is acceptable and needed, the over-emphasis of such “bureaucratic ritual[s]” (Vettori, Lueger and Knassmüller, 2007: 25) can lead to less innovative environments, as well as reduce the possibilities of engendering quality culture where each stakeholder takes an active ownership of the quality. Standardisation as such is seen as being at loggerheads with the innovative potential that universities are often called upon to realise. Furthermore, extant literature found that closed-ended items do not cover issues that are truly relevant to students (Kabanoff, Richardson and Brown, 2003). To provide an antidote to these ailments, Scott (2006) suggests that these types of surveys can be significantly improved if more qualitative data was mobilised for quality assessment. In reality, even when surveys do have a few qualitative, open-ended questions they attract very limited attention of very few individuals (Richardson, 2005), for reasons that usually revolve around insufficient resources and time to analyse and interpret them. As a result, the potential insights derived from this data fall through the cracks. To the knowledge of the authors, there has not been a systematic and at the same time resource-efficient use of qualitative data so far for the purposes of quality enhancement using students’ opinions.

Limited studies do show that qualitative data holds a wealth of insights and information, with recurring themes emerging that are not captured through quantitative-based surveys (Kabanoff, Richardson and Brown, 2003). Therefore, we strongly believe that new frontiers in quality assurance may be reached if students are given a free rein to speak in their own words and have higher education institutions analyse these more systematically to create new avenues of improvement. However, it is widely known that preparation, implementation and subsequent analysis using qualitative instruments would require mobilisation of large amounts of human resources and time, something that many higher education institutions in today’s day and age are not always willing or able to afford.



AI software will shape the future of data analysis in quality assurance ●

AI as the next step in quality assurance evolution

With the modern world being on the cusp of technological revolution, embedded in the era of digitalisation and big data, in order for higher education in general and quality assurance in particular to move forward, it is imperative that changes are made in line with these advancements. Being one of the most relevant applications in data economy (European Commission, 2020) and holding a wide array of applicability in different stages of quality management and enhancement, AI has potential to contribute to making these both efficient and innovative. To touch upon the basics, AI originated in 1950s and has its roots in engineering and computer science, but it is deeply interdisciplinary and has intersections with philosophy, cognitive science, neuroscience and economics. AI starts with a premise that learning and any facet of intelligence can be broken down to “atoms” in a way that is easy for a machine to simulate it. It is a broad umbrella term that can denote different phenomena such as machine learning, an algorithm, data mining and natural language processing (Baker and Smith, 2019). As it is slowly charting its way into different territories and gaining more momentum in science fields and knowledge management in general (Educause, 2018), AI in education is predicted to grow by 43% by the end of 2022.

As AI is slowly permeating different domains and fields, we believe it will find its place in and shape the future of quality assurance and management in higher education, particularly enabling thus the exploitation of the qualitative angle of quality enhancement. As qualitative data collection and analysis are quite a strenuous, time-consuming process, AI will prove to be rather advantageous here. For instance, a particular aspect of AI that can serve as an important lever for data collection process are AI chatbots. Essentially, AI chatbots are programmes which are giving directions to simulate conversations in a manner in which a human being would conduct them, either via text or voice interactions (Rouse, 2018).

So far, the use of AI chatbots in higher education has been rather sporadic and scarce (Winkler and Söllner, 2018) and the vast potential remains underexploited. A small number of studies have already shown successfully implemented AI chatbots in learning scenarios (Dutta, 2017; Huang et al., 2017). To illustrate this, some universities have been using AI chatbots to aid with admissions,

to help students plan and organise their courses, as well as guide them in more personalised learning trajectories. Examples of AI chatbots aiding in quality assurance management to support qualitative data generation and analysis have not been found so far despite the plethora of benefits. Specifically, the implementation of AI chatbots saves costs by eliminating almost entirely human presence. If implemented in quality assurance offices in the process of qualitative data collection, AI chatbots remove the need for an individual officer taking time to carry out the interview. With the availability of AI chatbots, it is possible to interview as many students as needed without any additional expenses incurred. A further invaluable advantage is flexibility. AI chatbots doing the interviews with students would allow for the interview to take place at anytime and anywhere, at the students’ convenience, contributing thus to the satisfaction levels of students. Doing the interview in the “natural habitat” of the student also contributes to students feeling more comfortable and makes them more likely to give authentic, natural responses. Despite being fabricated, AI chatbots can still provide engaging, meaningful and personalised interactions with students. Studies have found that spoken input as opposed to textual one, for instance, is seen to produce richer language, friendlier exchanges and longer dialogues (Cremonesi et al., 2017; Novielli et al., 2010). Therefore, AI chatbot-to-human interaction does not necessarily differ significantly from human-to-human interaction, making the whole process more natural and relaxing for the student, making them more cooperative and prone to giving accurate information.

Next to engaging AI through chatbots in the data collection process, AI software will shape the future of data analysis in quality assurance and thus contribute to a better understanding of student requirements, improving thereby the university services and the overall student experience. Data generated by AI chatbots is immediately stored digitally and does not require any human agency for transcription (in case of text chatbots) or only marginal efforts (in case of voice-enabled chatbots whereby the AI-supported transcription might be checked by a human), thus considerably saving time and costs for this practice. AI is capable of analysing large portions of data and detecting patterns significantly faster than a human eye can. Qualitative data analysis when done manually is an arduous and time-consuming process that requires time, focus and ability to make connections and detect patterns, something that is close to impossible when done for each student. Already today, AI is able to provide valuable insights into qualitative

data with new developments in the near future being expected to make further significant steps forward, closing the gap between AI-performed data analysis and human-performed analysis.

Resistance to the winds of change

Despite the benefits of AI in higher education, its embracement has been slow on the uptake in Europe and elsewhere. A widespread anxiety associated with AI is fuelled by the belief that computers and machines would replace all work hitherto done by humans and will leave the latter jobless. In reality, however, we see that automation of certain processes (such as interviewing students and transcribing data) leaves people in knowledge-intense positions at universities with more time to create new innovative paths and contribute more to system and institution development. Another common worry, especially in higher education, is that the solution needs to be perfect and optimally adjusted to the context in order to be used. The “raison d’être” is that there is no room for error. However, this is a counter-intuitive behaviour and an obstacle that needs to be removed from the mindsets in higher education circles. In reality, the elements associated with AI can only be improved upon when placed in use. Putting something to use only when it is useful leaves stakeholders in “analysis paralysis” where the decision to introduce a new solution is deferred until it is better than the current version, whenever that may be. In this respect, we recognise a certain misjudgement in the way that university managers compare the potential performance of AI-supported qualitative data analysis with human-performed qualitative data analysis, and in this respect the human-performed analysis still achieves better results. However, as human-performed qualitative data analysis is hardly performed (due to the efforts required), the comparison standard should rather be the quantitative approach usually undertaken. Compared to these, AI-supported qualitative data analysis results in better insights in many aspects.

Further down the road, the lack of AI strategy on the institutional level is another palpable inhibitor that may preclude the use of AI in quality assurance departments. With the absence of a clear vision and dedicated leadership in this direction, it is very difficult for the subordinate units to see the value of AI and take concrete action. Tightly connected to this, the lack of digital literacy and upskilling pathways, clinging to the old ways of going about business is a further enemy to embracing AI in quality assurance offices. Further argument of naysayers when it comes to AI is that it is too costly to implement. While that may be true in the initial phase, the benefits and significant savings and efficiency will be compounded to make AI a solution that pays off in the long run.

Conclusion

Hailed as the “next electricity”, AI holds a vast potential to accelerate the development of higher education quality assurance in the decades to come. It can serve as a major ally in the attempt of higher education institutions to capture quality from different angles, derive more insights from qualitative data and ultimately usher in a new era where quality culture is the regular “modus operandi”, rather than merely an elusive academic concept. And ultimately, this could serve as a great opportunity for starting to embrace change in higher education more readily. As Peter Drucker once famously said: “An organisation must be organised for constant change” (Drucker, 2004).

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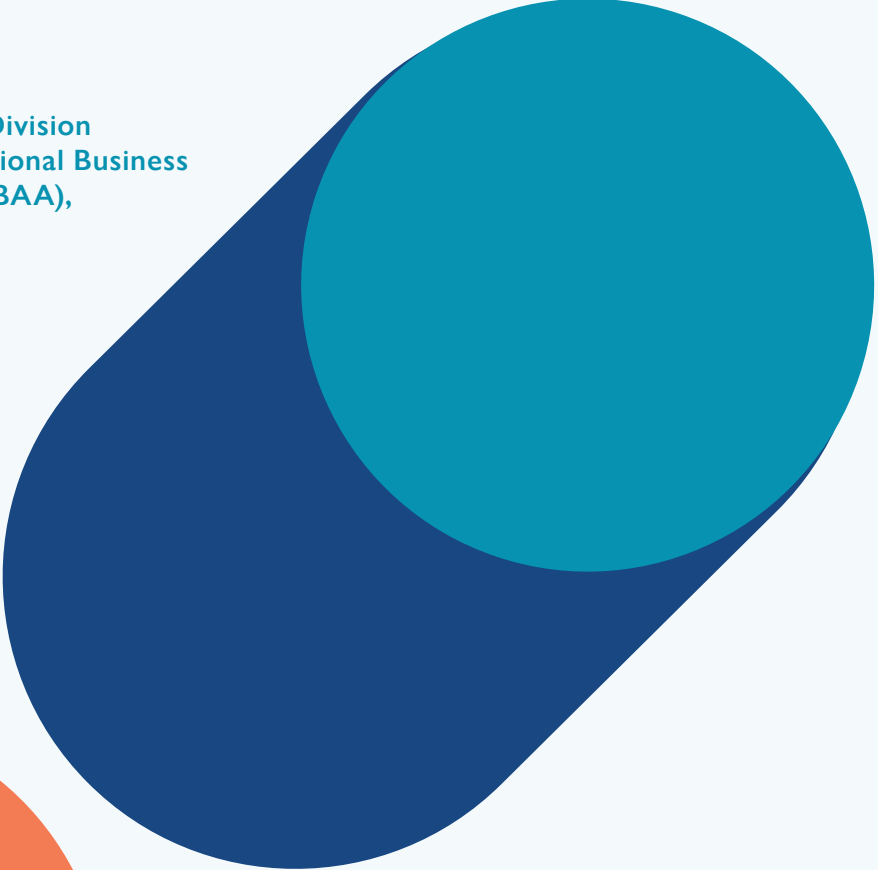
Digital transformation

in quality assurance and its impact
on communication

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Introduction

As for almost all areas, the Covid-19 crisis represents a hard break for higher education and the accreditation systems. For this reason, several webinars have been held on the subject (AACSB 2020; ENQA 2020). The accreditation agencies felt the impact of the fact that many on-site visits within the scope of accreditation procedures were postponed indefinitely. For everyone's safety, many agencies have asked their staff to work from home. As far as the higher education institutions (HEI) are concerned, the federal structure in Germany and the extensive academic freedom of the HEIs meant that their reactions were not simultaneous, initially. Ultimately, however, all HEIs had to massively restrict their research and teaching activities. For private HEIs without state funding, this measure naturally represented a particular economic burden. Meanwhile, many HEIs, which use traditional teaching and learning methods, have been obliged to switch to digital media. Next winter 2020-2021 will probably be the first semester in academic history in which face-to-face lectures will merely play a secondary role.¹

With regard to the accreditation system, at least in the German higher education area, the German Accreditation Council reacted quickly and determined that HEIs would not have to fear possible accreditation gaps, but could rely on an extension of the accreditation periods (German Accreditation Council, 2020). Surprisingly, we are currently facing the paradoxical situation that many peer review experts in the higher education sector, who are increasingly working from home due to the Covid-19 crisis, actually have a lot of time for site visits – especially when such site visits are

¹ On digital teaching see Handke 2017: 58-68. On digital exams in the German higher education law, see Morgenroth 2020: 130. Research and development projects dealing with electronic proctoring, for example, are currently receiving a boost from the Covid-19 crisis. FIBAA is involved in such a project for consultancy services and, together with its partner institution, will publish the results in a suitable place.

On-site visits are the milestone in the accreditation procedures

conducted digitally. However, such digital site visits have so far only been carried out by some HEIs and accreditation agencies. The main reason for this, apart from concerns about the legal requirements, is the uncertainty of how such site visits are carried out successfully.

For this reason, the Foundation for International Business Administration Accreditation (FIBAA), which has its head office in Bonn (Germany), shares its experience as an accreditation agency in this article. The interim results of the digital site visits are to be processed from the perspective of the stakeholder HEIs, project managers and peer review experts in order to work out a successful model for digital site visits. Indeed, the authors recognise a connection between digital transformation and communication in a “remote world”. Therefore, a section at the beginning of this article is dedicated to this subject.

Communication in virtual environments

Whether we wanted to or not, the last few months have taken us into the world of digital communication. Offices, with their employees and managers, were suddenly 100% connected via the internet and were responsible for the companies' activities via various communication platforms. Day-to-day business, corporate decisions and work for the companies all took place “remotely”. Of course, the accreditation agencies were also confronted with this situation and it quickly became clear that the respective processes of the ongoing accreditation procedures could not suddenly come to a standstill.

A challenge was posed by the procedures, especially in connection with the on-site visits to HEIs. On-site visits are the milestone in the accreditation procedures, in which it is necessary to question the explanations of the self-evaluation reports more closely and personally on-site, and to enter into dialogue with the respective actors at the HEIs. These facts form a further important basis for the subsequent expert opinion on the accreditation of the HEI. An essential part of this milestone in the entire process is the exchange, dialogue, and discussion with the various stakeholders – in short, intensive communication. Thus, it was necessary to suddenly make this intensive “communication milestone” virtual, if one did not want to delay the procedure or postpone the upcoming accreditation.

In order to better understand the essential feature of the on-site visit – the communication and the perspectives of the different actors presented below – a brief digression is needed into the situation of communicating in the “remote world”. Peter Dietrich explains here in a newsletter of the University of Applied Sciences Kufstein in Tyrol on the “remote world” published in April 2020 that communication is based on feedback

from the mutual communication actors. “As soon as two or more actors get into contact with each other, they orientate themselves on the reactions – in other words, on the feedback of the other” (Dietrich, 2020: 1). This aspect applies both verbally and non-verbally, such as with gestures and facial expressions of the respective interlocutor. Non-verbal feedback, in particular, usually helps us to underpin our messages with the intended meaning. In order to achieve this effect in the “remote world” as well, we increasingly make use of the emojis we are familiar with in virtual conferences in a parallel chat. Indeed, as Dietrich points out, communication via our virtual platforms does not seem to convey this feedback function as effectively: “Digital communication does not share all the characteristics of analogue communication and vice versa” (Bauer and Müßle, 2020: 12). The authors Bauer and Müßle also state that emoticons are not a full-fledged substitute for facial expressions, body language, timbre of the voice, frowning, and laughing. Dietrich’s clear statement here is that “A ‘less’ of direct contact must be compensated by a ‘more’ elsewhere.” But what does this mean for the situation in the on-site visits? Here, the communication success factors listed by Dietrich should be transferred accordingly (see Dietrich, 2020: 3).

1. **Over-prepare:** This means that, as described in detail below, the on-site visit requires more intensive and detailed preparation from all sides, especially with regard to the peer review experts’ list of questions for the interview partners at the HEIs. Last but not least, the preparation of the technical conditions must take place.
2. **Over-act:** The project managers must have good moderation skills and all information must be highlighted supportively, which can lead to a more pronounced feedback function.
3. **Over-view:** “You can’t not communicate” – this axiom of Watzlawick is not to be seen in remote mode in the same way as in personal conversation. There is no non-verbal communication. It is therefore important that there is a second project manager in the remote “on-site visit”, who has exactly this “non-communicating” in mind and also does not overlook an occurring “side chat”.
4. **Over-care:** Getting to know each other personally through dialogue is one of the important aspects of the on-site visit. Watzlawick names this fact in his second axiom “Every communication has a content and relationship aspect” (Watzlawick et al., 2017). This awareness must be anchored even more firmly in a site visit, since – in the virtual environment – the important relationship work can only be ensured to a limited extent. In the following sections, the consequences of the factors of “remote communication” illustrated above for the virtual environment will be described in detail.

The higher education institution in the ongoing accreditation process

Although the German Accreditation Council has made it clear that an extraordinary extension of the accreditation periods is possible, many HEIs (especially private ones) are interested to finish the accreditation procedure in order to be able to actively advertise on the higher education market. To achieve this goal, there are a number of tasks on the way to accreditation, including intensive communication with the accreditation agency. The HEI should define a person as coordinator (or a small circle of representatives) to prepare the accreditation procedure in close cooperation with the agency’s project manager. Internally, the tasks in the preparation of the accreditation procedure start with the direct interchange between the staff, which is currently limited and mainly compensated through digital channels. In concrete terms, this means that self-evaluation reports, which require – on the one hand – the technical and content expertise of the lecturers is required, and – on the other hand – the knowledge and editorial work of the administration and quality management, are currently produced with higher expense and loss of time in some institutions. At least in HEIs where classical communication channels were established and local exchange was institutionalised, the switch to digital channels is associated with certain costs. The coordination between the interview groups must be timely and remote.

One of the biggest challenges for many HEIs is the required technology for digital site visits. Within the scope of preparing a digital site visit, it must be ensured that all relevant groups (HEI management, course management, teaching staff, quality management, administration and students) are available at the appropriate time and have access to the digital platform of the site visit. This naturally includes the organisation of office space if some of the HEI staff participate in the digital site visit from a common location.

Another important criterion for successful implementation is technical support for the procedure. From this it can already be concluded that personal resources are increased in many digital procedures. In some cases, even further investments (e.g. additional licenses for communication platforms) are necessary. Timely and careful preparation of the procedure is crucial for successful accreditation processes.

Accreditation agencies and their project managers

On behalf of their accreditation agency, the project manager is faced with the task of ensuring compliance with the legal requirements, guidelines and standards of

the accreditation system, also in the context of digital site visits. One challenge is the coordination with the HEI regarding the scheduling and specifications of the digital site visit. All steps of coordination need a longer waiting time based on obtaining consent and clarification of feasibility.

Instead of personal preliminary talks at the location of the accreditation procedure, a digital exchange or a telephone conference must take place. Here we can already assume that in terms of preparation, a digital procedure amounts to more intensive preparation. This concerns the request of relevant materials in terms of the assessment criteria, the coordination of the experts and interview partners of the HEI and, of course, also the technology for the digital procedure (see below).

The accreditation agencies have, as a side effect of the digital transformation, an increased internal need for training in building up online moderation competence (see above: “Over-act”). As a rule, two project managers (instead of one project manager) are assigned for digital procedures and will be occupied with the procedure for a day (extended staffing requirements). On the one hand, the demands on project managers in online moderation are higher, on the other hand, technical support for the project manager is necessary. The parallel content-related discussion and technical requirements can only be accomplished by two project managers and a technical service back-up.

Depending on the accreditation agency, the need for coordination may arise with regard to office space (and corresponding reservations), technical equipment, deadlines and the avoidance of overloading the data flow. For the accreditation agency, careful preparation of the infrastructure naturally also includes license management. An insufficient number of licenses can not only jeopardise the site visit, but also cause damage to the agency through operational consequences and legal sanctions. In this respect, care must be taken to ensure that not too many site visits are carried out in parallel. The agency may therefore have to make additional investment for licenses of the conference tool. When choosing a conference tool, special attention must be paid to the question of data protection compliance. A constant risk that affects both the moderation skills of the project manager and the feasibility of the entire procedure is the technology and its vulnerability to problems. For digital site visits to be successful, intensive internal coordination, preparations, additional competences of the project managers and additional personal resources are therefore needed.

Peer review experts

The digital transformation is opening new paths and can save certain resources. For peer-review experts, digital procedures offer the advantage of being extremely

time-saving. A digital procedure can be integrated much more easily into the everyday life of science representatives, representatives of professional practice and students, since there is no time lost for travelling to and from the location of the HEI. Professional and private life can often be better reconciled with digital assessments than business travels.

But the switch to digital procedures can also be accompanied by an increased need for technical support. Since the preliminary discussion of subject matter on site is no longer carried out, the exchange within the expert panel is limited to a digital exchange or a telephone conference. An assessment of the HEIs’ resources is limited to the information in the self-evaluation report, which may be visually illustrated by photographs. Documents (such as written exams and evaluations) are no longer viewed on site and discussed spontaneously. In general, the spontaneous element is omitted. With regard to the entire communication, spontaneous information that necessarily appears during a dialogue is lost. To compensate for this, two things are needed: First, intensive preparation and second, building a relationship between all participants, preferably in advance (see above: “Over-care”).

Conclusion: an approach to successful digital transformation

FIBAA’s experience shows that the digital transformation through the implementation of digital site visits is certainly possible. Digital procedures have advantages in some aspects, for example when one considers the time saved e.g. for travelling which, however, also pays for itself through more intensive preparation. There are technical and personal requirements for digital processes which do not exist for classical procedures.

1. A more intensive preparation time for coordination within the HEI, within the accreditation agency and within the expert panel must be expected (see above: “Over-prepare”). For a successful procedure, it is advisable that all parties involved exchange information extensively in advance by telephone and digitally. Every on-site visit has to have a testing phase before, so that the technical functioning of communication is ensured from a technical perspective.
2. Accreditation agencies have an increased internal need for training in building up online moderation competence (see above: “Over-act”). The training of the project manager for online moderation has a special role to play. It makes sense if the second project manager accompanying a procedure is not only technically versed, but can also provide support in terms of content.
3. This second project manager is also essential for the “Over-view” (see above). Only a clear

“Over-view” and good preparation can compensate for the limitation of communication (e.g. the loss of spontaneous elements).

4. The limitation of communication must be compensated by “Over-care”. The more intensively that all those involved exchange information beforehand, the better a personal relationship can be established. In the sense of Watzlawick, communication then not only includes a content aspect, but also a relationship aspect.

On the basis of all the aspects mentioned, it can be stated that digital site visits are possible, but only if the procedure is adapted to digital conditions. From the point of view of the accreditation agency this leads to more personnel and technical resources and thus to further costs. However, nothing stands in the way of a successful implementation of digital procedures, whereby a good and trusting cooperation of all participants is crucial for success. The digital transformation can only be achieved by adapting to the new comprehension of communication.

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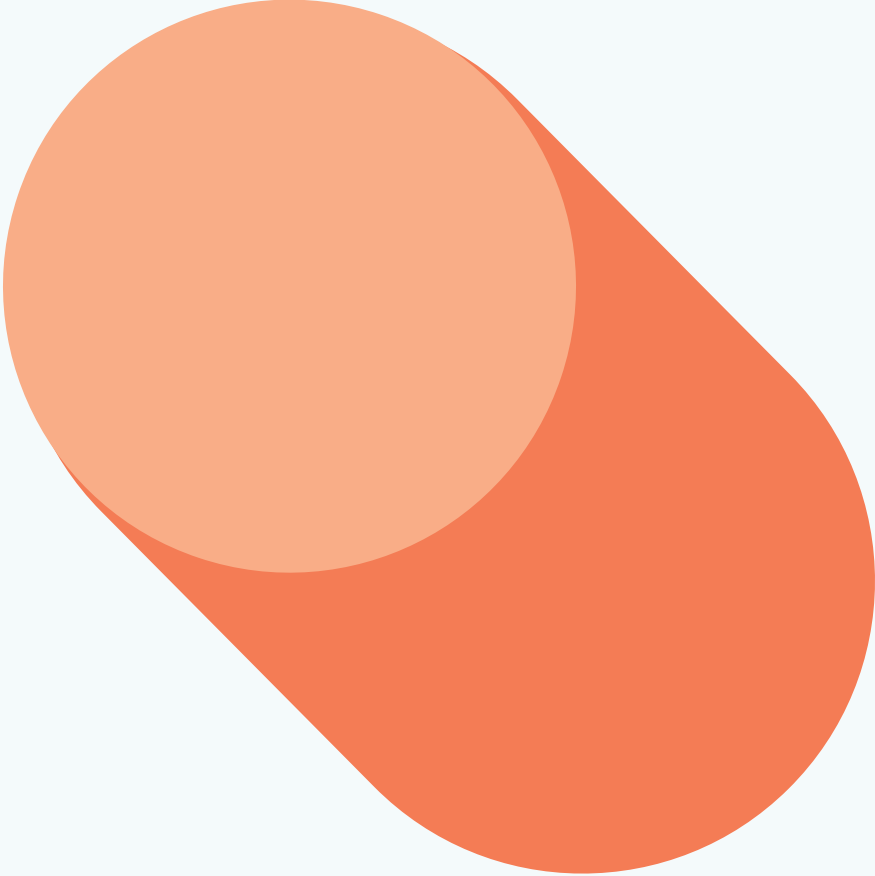
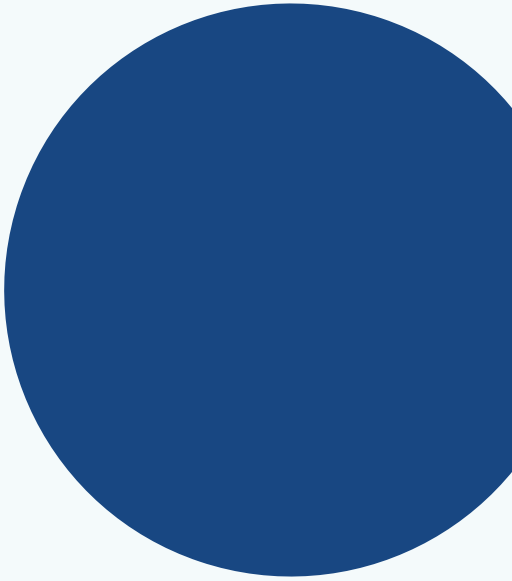


“Life is Flux”:

**the future of online
accreditation site visits**

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Life in lockdown is the new reality all over the world, and the Covid-19 pandemic set up a number of challenges which should be addressed by all countries, people and institutions including quality assurance (QA) agencies. One of the founders of dialectics, Heraclitus, is famous for his aphorisms associated with the absolute and non-stop variability of all things and changeability of everything. His statement “Life is Flux” or “Everything flows, everything changes” means everything is changeable and there is nothing permanent in the world (Mark, 2010). Modern society and institutions facing such changes should react accordingly and amend their policies and procedures in order to address challenges associated with such changes.

QA response to Covid-19

The higher education sphere is quite sensitive in terms of lockdown because in most countries of the world, governments have as a matter of urgency closed all educational institutions. As a result, most QA agencies immediately cancelled all site visits and the other face-to-face activities.

It is important to note that international institutional QA architecture is well-developed and became a serious support for the QA agencies. ENQA, INQAAHE, CEENQA, and CHEA established a series of webinars and conferences, launched social media campaigns, developed materials, became platforms for case studies and experience exchange, and created separate webpages to share materials associated with Covid-19 issues. As a reaction to the pandemic, INQAAHE, CEENQA and ENQA have, for 2020, moved their key annual events and other activities into online format. ENQA has created a separate webpage with Covid-19 related materials and suggested to the QA agencies to be flexible and adapt their activities and evaluation process to quarantine conditions, highlighting their crucial role in supporting and offering guidance on online learning to the universities (ENQA, 2020). The importance of accreditors’ flexibility and appropriateness of online site visits was declared by the federal government of the US. Enhancing e-learning, conducting site visits virtually, modifying QA policies to respond pandemic challenges are encouraged by the US authorities and CHEA (CHEA, 2020; USDE, 2020).

QA agencies also support each other sharing experiences and offering consultations on bilateral basis. For instance, during the period of April-June, 2020 the National Agency for Higher Education Quality Assurance, Ukraine (NAQA) has conducted about two dozen agency-to-agency and consultancy meetings with colleagues from France, Georgia, Lithuania, Estonia, Sweden, Belgium, Turkey, Saudi Arabia, and Northern Cyprus. In addition, during the lockdown, NAQA has participated in the QAA UK International Partners Forum and signed bilateral memoranda of cooperation and understanding with NCEQE (Georgia), HCERES

(France), and IAAR (Kazakhstan). Such meetings and cooperation provide a chance to learn from foreign practices, to benchmark procedures and policies, and to share own experience. The international QA environment has appeared to be supportive, flexible and open for innovations and collaboration – it helps a lot during the pandemic, not only to recently launched agencies like NAQA, but also to those QA agencies that face serious problems under such circumstances.

Online accreditation site-visits: NAQA case

The first reaction of NAQA to the Covid-19 nationwide lockdown was discussed in the article “Educational Programs Accreditation in Pandemic Times: Challenges for NAQA (Ukraine)” (Stukalo and Dluhopolskiy, 2020), which was presented among ENQA’s case examples (ENQA, 2020: 9). This case offers some analysis of NAQA’s practice of online site visits between 23 March and 1 July 2020.

On 11 March 2020, the Cabinet of Ministers of Ukraine announced a nationwide lockdown. Starting from that date, all higher educational institutions worked online and no face-to-face activities were allowed. Considering the fact that 2020 is only the second year of NAQA’s official activities and there are more than 1600 applications from higher education institutions for the accreditation of their study programmes in 2020, this situation became a serious challenge for NAQA. As all study programmes were being accredited for the first time in Ukraine (previously only specialties were accredited by the Ministry of Education and Science of Ukraine) pausing accreditation meant that higher education institutions would not be able to issue diplomas for their students in 2020. So, there was no way to stop the process of study programme accreditation and NAQA team brainstormed the options to move forward under such circumstances.

NAQA was partly prepared for moving accreditation into an online format as from the very beginning of its activities the digitalisation of all documents and some key procedures was a priority. The accreditation platform was created and electronic workflow was implemented before the lockdown: all stages of the accreditation process are reported on the platform, documents are submitted by higher education institutions in electronic form, Sectoral Expert Councils review the cases, vote and submit their decisions and recommendations via this platform. There were just two procedures where physical presence was required: 1) accreditation site visit to the higher education institution; and 2) the NAQA meeting for final decision-making and voting.

So, it was decided to develop an approach to move also these two steps of the procedure into an online

Such format has both advantages and disadvantages

format. The provisional accreditation procedure using information technology tools and videoconferencing (NAQA, 2020) to respond to the Covid-19 lockdown challenges was adopted. Later, in addition to the NAQA provisional accreditation procedure, the Cabinet of Ministers adopted the regulation on accreditation in Covid-19 pandemic times. According to the regulations, the online site visits are conducted on the basis of the following principles:

1. **temporality:** this is a temporary procedure to address challenges associated with the nationwide Covid-19 lockdown;
2. **preliminary investigation:** the decision to apply this procedure to each particular study programme is made by NAQA on the basis of the investigation of each case, documents submitted by the higher education institution, previous site visits to this particular higher education institution, and the other available materials and information about the higher education institution and study programme;
3. **consistency and comprehensiveness:** the evaluation should be done in full, all meetings with stakeholders must be ensured, and all accreditation criteria must be evaluated properly;
4. **safety:** experts and the other participants of the accreditation process must avoid face-to-face contacts. All interviews with stakeholders, discussions within the expert group, meetings with the higher education institutions and NAQA representatives should be done using videoconferencing and other IT tools;
5. **support:** the NAQA Secretariat provides technical support and advises all participants of the process accordingly. It is also important to note that the NAQA Head and Vice-Heads conduct weekly videoconferences with the experts in order to respond to their queries and concerns.

An online site visit lasts three days (the same period as a normal face-to-face site visit) and its agenda includes all required interviews, meetings and discussions. All online site visits are conducted via videoconferencing tools, and are supported and recorded by the NAQA

Secretariat. NAQA members join such meetings as observers. Meetings of NAQA members are held on the basis of a blended model: NAQA meets physically (with masks and social distance) and some members join the meeting via videoconferencing. It allows everybody to participate in the discussion and to vote for the final decision. Such meetings are broadcast via NAQA's Facebook page. It is also important to note that NAQA has introduced some social media projects (such as the NAQA School of Quality, NAQA comments, NAQA recommends, NAQA Facebook webinars and online consultations) in order to support stakeholders, explain the policies, answer questions and address concerns. These projects are held on a constant basis and have become very popular in the academic environment.

The first online site visits using this provisional accreditation procedure started on 23 March 2020. Almost 500 accreditations were completed by 1 July 2020. The outcomes of the online site visits are comparable to the face-to-face site visits: 1% - excellent study programmes, 63% - normal 5-year accreditation; 35% - conditional one-year accreditation; and 1% - denials in accreditation. According to the expert online survey (347 participants) conducted in mid-June, 51% of experts who participated in an online site visit recommend NAQA to keep online accreditation in post-pandemic times, plus 17% more experts recommend to have online accreditation as an option. More than 14% of experts consider online site visits to be more effective and appropriate than physical ones, and more than 50% of experts think there is no significant difference between an online and a physical site visit. The feedback from higher education institutions is also mainly positive and there is evidence that the expert panels, university representatives, students and other stakeholders feel comfortable using videoconferencing tools to meet and to talk. It is also noted that the NAQA Secretariat is supportive and no major technical issues appeared. The only issue mentioned by the university representatives is that preparation for such site visits requires more effort and IT tools (for instance, to demonstrate facilities, laboratories, etc.) and expert panels asked for more documents as evidence and proof of some activities.

Online accreditation site visits: pros and cons

The first experience and analysis of the practice of online site visits are evidence that such format has both advantages and disadvantages. Cost and time saving, transparency and flexibility are among positives. From the other side, there are still some issues with legislative and regulatory bases, accreditation of some specific study programmes and a sceptical attitude of conservative stakeholders. The strengths, weaknesses, opportunities, and threats of online accreditation site visits are presented in table 1.

Law of change: what's further?

Heraclitus' aphorism "Life is Flux" became a basis for the "law of change" which is of relevance across centuries, for the entire human race, and applicable to all spheres. Higher education and its quality assurance are not exclusions and are changing under current circumstances.

So, will quality assurance change as a result of Covid-19? How will it change? What is the future of online accreditation site visits? Is the online site visit a temporary tool or can it be considered in the future? Are online site visits acceptable as alternative to traditional site visits in the post-pandemic future? This study raises some questions which cannot be answered in full at this stage, but there is evidence that quality assurance will change in response to the Covid-19 pandemic challenges. The current practice of online site visits could potentially form a future trend for the next decade of quality assurance and will require changes in quality assurance methodology. The investigation of the current practice of online site visits allows some findings and conclusions to be presented.

Firstly, online site visits could become a good alternative to physical site visits in case of:

- online study programmes and e-learning;
- pandemic situations and other exceptional circumstances;
- international evaluation visits;
- budget-saving measures.

Secondly, a prospective alternative is a blended model of site visits where some experts can be physically present during the site visits and some experts can join the

expert panel online (using a videoconferencing tool). The blended site visit can combine the advantages of both online and physical site visits. However, developing and implementing this model requires a clear methodology.

Thirdly, in countries with developing quality assurance systems, the agencies should be flexible and demonstrate responsiveness to challenges and be able to support stakeholders. This is very important in order to ensure the consistency of the quality assurance process, trust among all stakeholders and to avoid potential failures associated with delays in study programme accreditations.

Fourthly, there is a need for a clear methodology for online and blended site visits, and recommendations for national regulations and procedures. It is obvious that they will differ from country to country, but some universal advice and requirements could be introduced and shared.

Finally, it is a good time to discuss a new version of the ESG and this revision should consider the changes in higher education and its quality assurance associated with the current Covid-19 pandemic.

Table 1. Online accreditation site visits SWOT analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> ● Flexibility allowing accreditations to be conducted under different circumstances ● Accreditation cost reduction for higher education institutions (experts' travel expenses are excluded) ● Saving time for experts (no need to travel) ● Transparency (all online site visits are recorded and can be observed by QA agency members) 	<ul style="list-style-type: none"> ● Not easily applicable to some field of studies (for instance, study programmes in art, music, drama specialties) ● More documents are required for clear evidence ● Expert panels may struggle to feel the "university spirit" including traditions, history, informal relationships, etc.
Opportunities	Threats
<ul style="list-style-type: none"> ● An alternative in case of a second wave of the Covid-19 pandemic ● Development of a blended model for site visits ● Implementation of innovative approaches and tools of higher education quality assurance 	<ul style="list-style-type: none"> ● Online site visits are not allowed or allowed only on a temporary basis in some countries ● Lack of a relevant legislative basis ● Some stakeholders are sceptic about online site visits

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Quality assurance:

the new normal and strategies

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The education system, like many other spheres, faced unprecedented challenges in the times of crisis caused by the Covid-19 pandemic. On 26 March 2020, the European Association for Quality Assurance in Higher Education (ENQA) published a statement, where specific issues of the work of the association and accreditation agencies during the pandemic were explained. ENQA encouraged its members to show flexibility in their own review processes, adapt their current activities where necessary, and seek ways to support higher education institutions that are facing an unprecedented disruption to their normal operations (ENQA, 2020). The associations of accreditation agencies (INQAAHE, ENQA, APQN, CHEA) have also committed to help their members to continue their activities and have disseminated good practices using the opportunities of the internet (webinars, online conferences). Such support is especially important for those agencies whose sources of financing are accreditation and project activities. It is necessary to not only maintain the education quality, and periodicity and quality of accreditation procedures, but also to keep the staff of accreditation agencies.

In May 2020, the National Centre for Public Accreditation (NCPA) initiated the development and delivery of a survey among quality assurance agencies in the Pacific region and European countries to study practices and possible approaches to maintaining the activities of accreditation agencies. The initiative was supported by the APQN Board of Directors and its President Professor Jianxin Zhang.

Survey of European and Asia-Pacific quality assurance agencies on their Covid-19 response

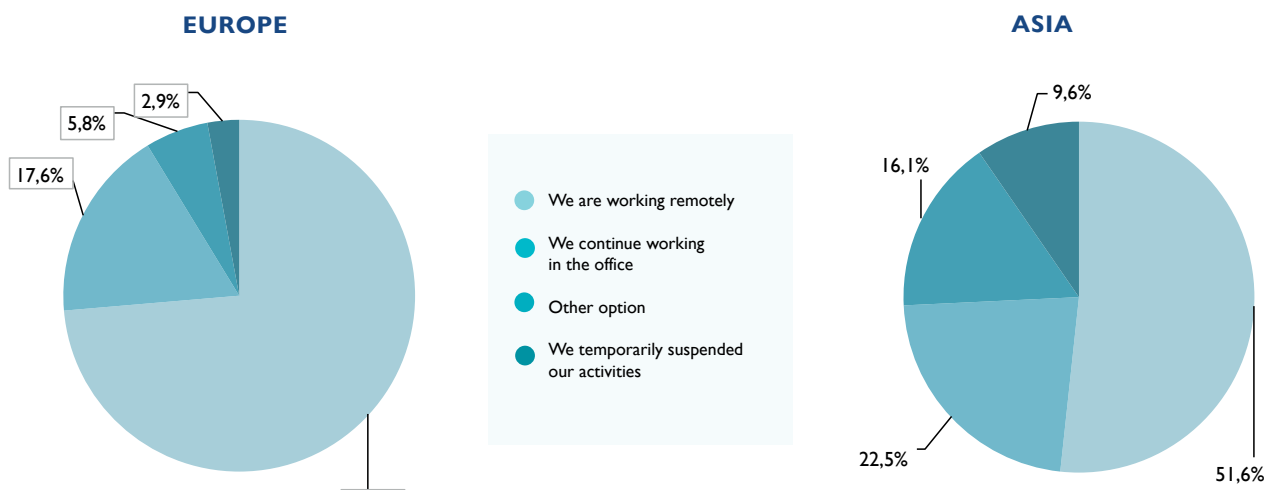
A list of questions on the agencies' activities during the pandemic was developed for the research. Multiple choice answers as well as open ended responses were available for each of the questions. The SWOT analysis of NCPA's performance during the pandemic and the findings of the survey were the basis for a more thorough analysis of the agencies' performance. Since only a half of the targeted audience responded to the survey, the results cannot be considered comprehensive and conclusive. However, the survey gave an opportunity to draw certain conclusions about the possibilities of maintaining and developing the current working conditions considering the related advantages and disadvantages.

The survey was sent to 62 European agencies (ENQA and CEENQA members) and 71 Asian agencies (APQN members). 34 European and 32 Asian agencies responded to the survey. The results of the survey show that more than a half of the agencies are working remotely (73.5% - Europe, 51.6% - Asia). Some have combined office hours and remote work, and a few agencies temporarily suspended their activities.

WORKING ARRANGEMENTS

The agencies were asked about the biggest challenges they face when working remotely, and most of them noted that it is difficult to ensure the quality of education while conducting external reviews remotely (45.1% - Europe, 37% - Asia) and communication with

co-workers became harder (38.7% - Europe, 44.4% - Asia). The participants also reported that the available tools and technologies became an issue. Only three agencies in total noted that they do not face any challenges while working remotely.



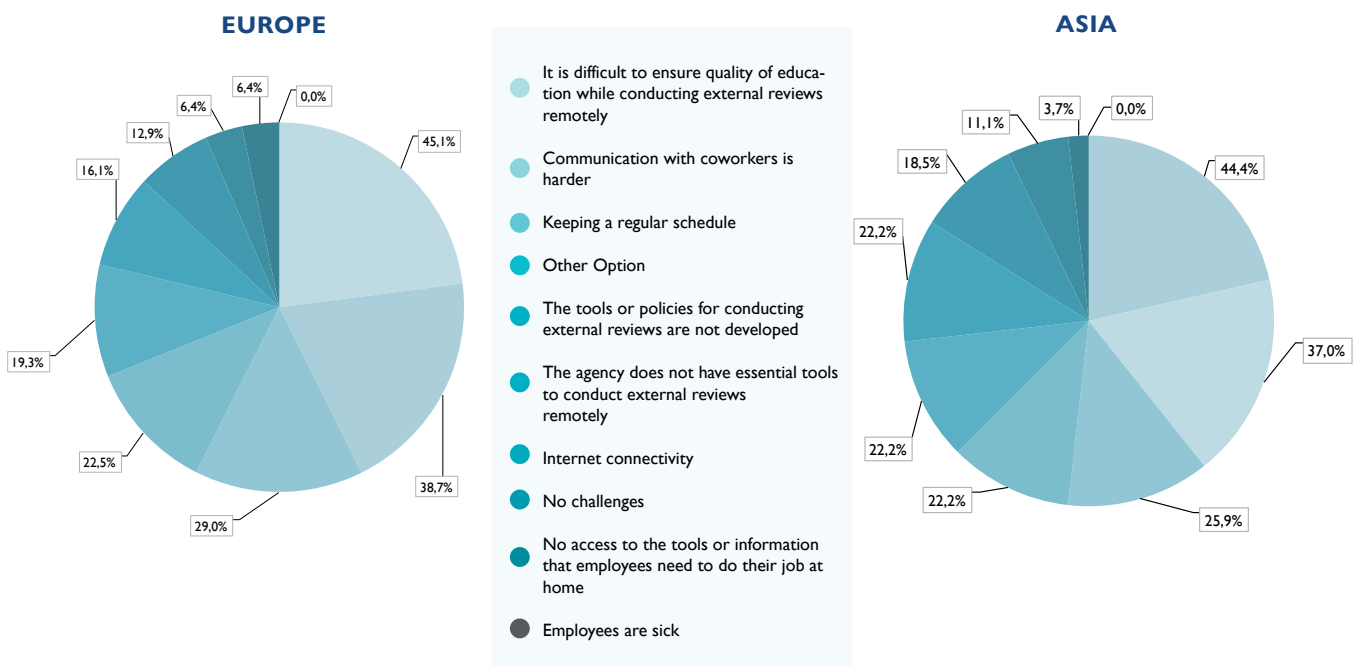
CHALLENGES TO WORKING REMOTELY

The answers to the “other options” regarding challenges with remote working included

- challenges related to enabling all stakeholders to participate;
- no external review is conducted at the moment;
- national regulations require site visits;
- in some cases, online site visits are used;
- preparation for the site visit is more time-consuming and there are elements which are difficult to assess remotely, for example, resources;

- educational organisations suspended their self-assessment during quarantine;
- agency staff are working more than their official working time.

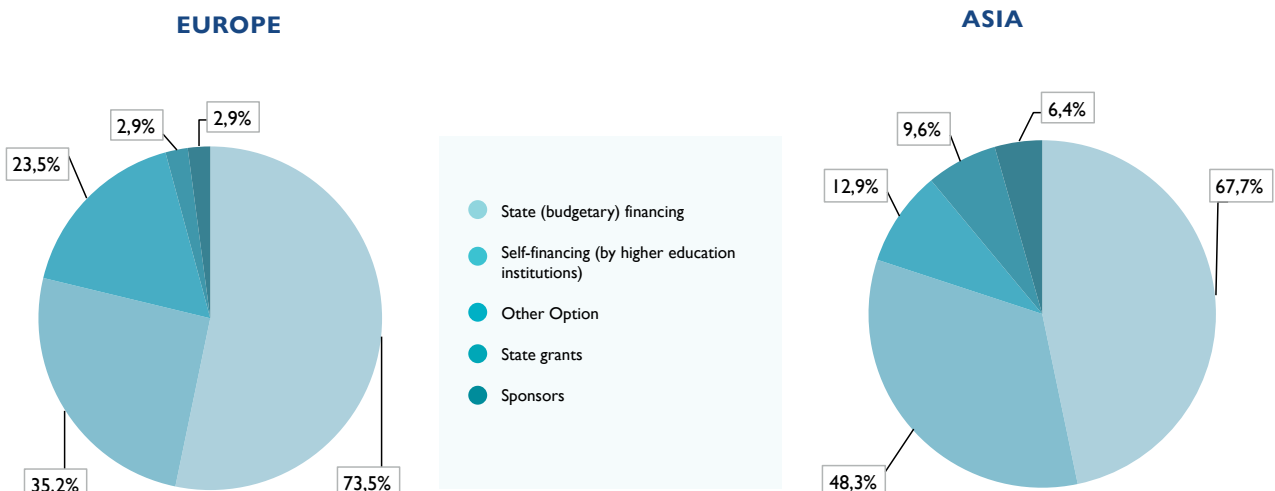
In order to understand the impact of the pandemic on the financial sustainability of the agencies, they were asked about the sources of financing. Most of the European respondents are state financed (73,5%) and most of the Asian providers are self-financing (67,7%).



SOURCES OF FUNDING

As many events were cancelled and activities of the agencies were restricted, the pandemic influenced their financial sustainability. For the majority of European agencies, income remained unchanged (50% - Europe,

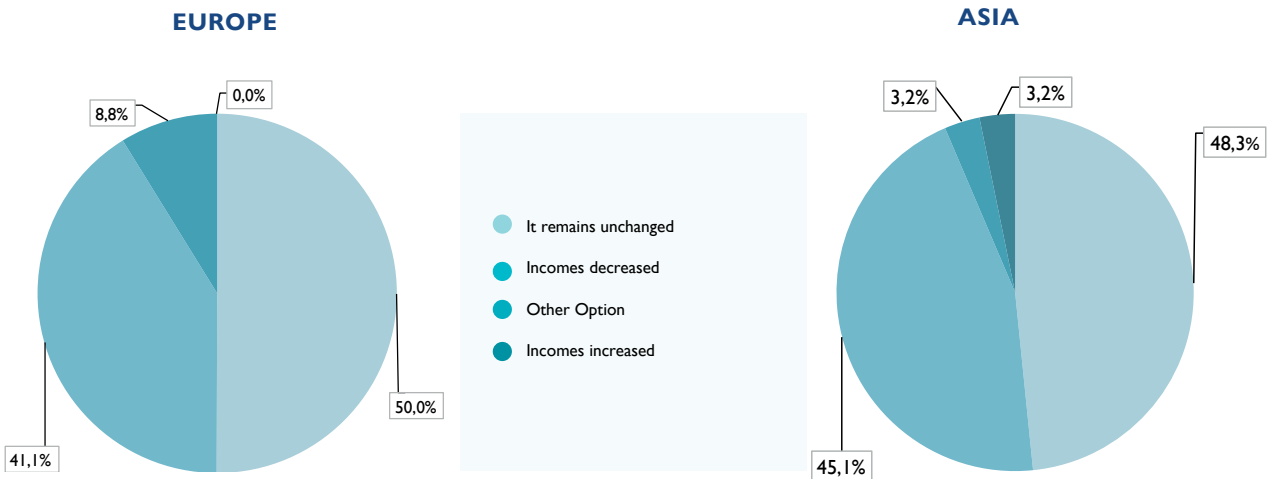
45,1% - Asia), and for most of the Asian agencies, income decreased (41,1% - Europe, 48,3% - Asia). One of the Asian agencies noted that their income actually increased during the pandemic.



CHANGES IN INCOME

Accreditation processes of higher education institutions require site visits, which became impossible due to the restrictions, and online site visits were considered more complicated to organise, which is why many of the agencies temporarily suspended the external reviews (35,2% - Europe, 41,9% - Asia), while others decided to conduct the reviews remotely (32,3% - Europe, 16,1% - Asia).

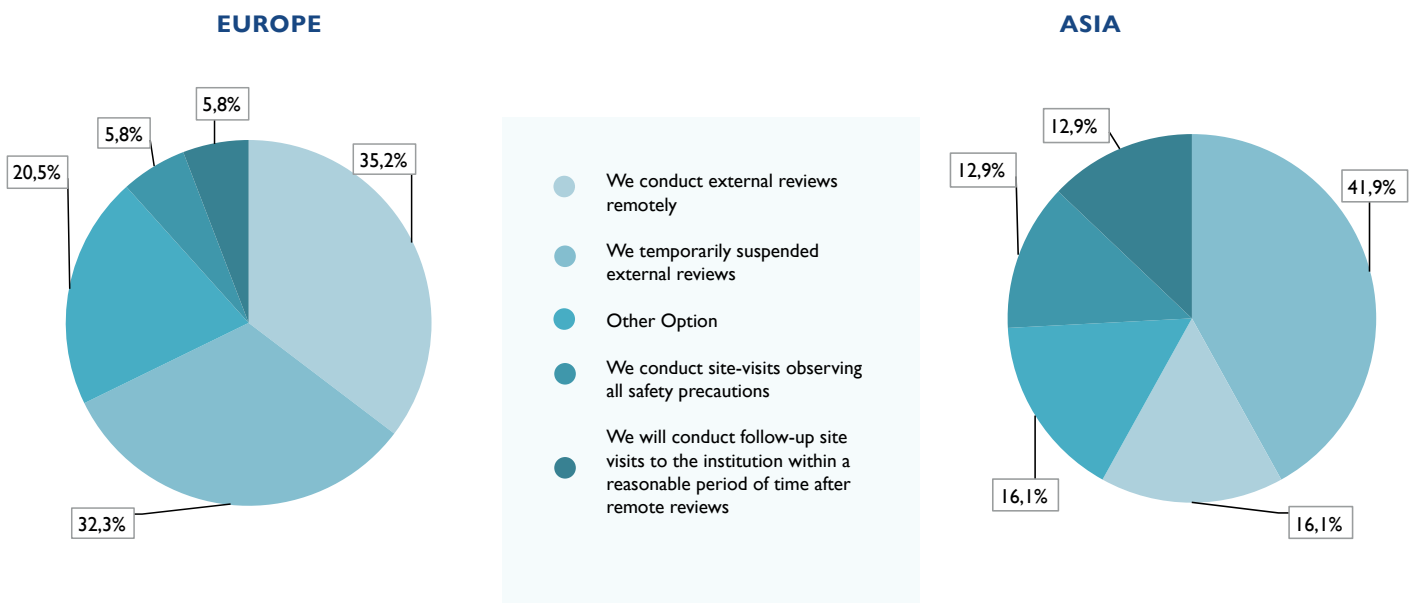
Some of the agencies decided to conduct follow-up site visits to the institution within a reasonable period of time after the remote reviews (5,8% - Europe, 12,9% - Asia). The general answer for the “other option” was that some external reviews are conducted remotely (for example, those that do not require international experts) and some are postponed until a safer period.



HOW WERE SITE AND FOLLOW-UP VISITS CONDUCTED?

Modern technologies became a great solution to the problem of conducting external reviews in the current conditions. The agencies use videoconference calls, emails, document reviews, phone calls, and a few have developed new tools and policies. Others do not

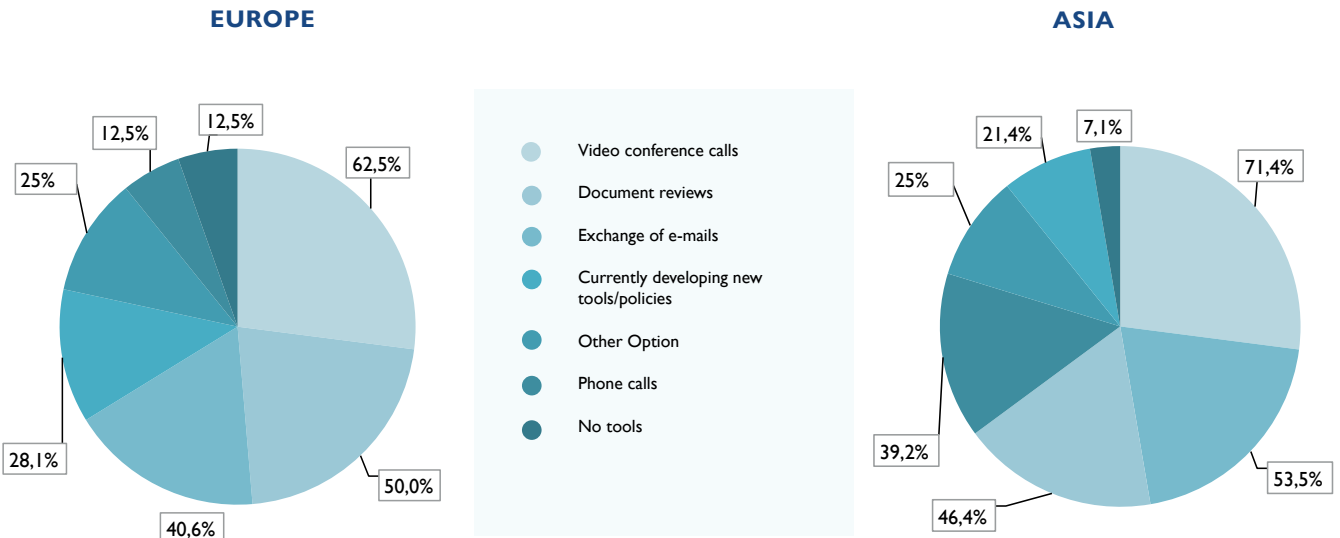
employ any tools as they temporarily suspended external reviews. As for the “other option” section, agencies hold web-conferences for peers/experts before the sessions with a higher education institution, and are thinking of other options for the future.



TOOLS USED FOR EXTERNAL REVIEWS

When agencies were asked about the measures they take to cope with the challenges, almost all of them answered that they cancelled major events, which obviously cannot be held in the current situation. Agencies additionally informed their employees on the ways to

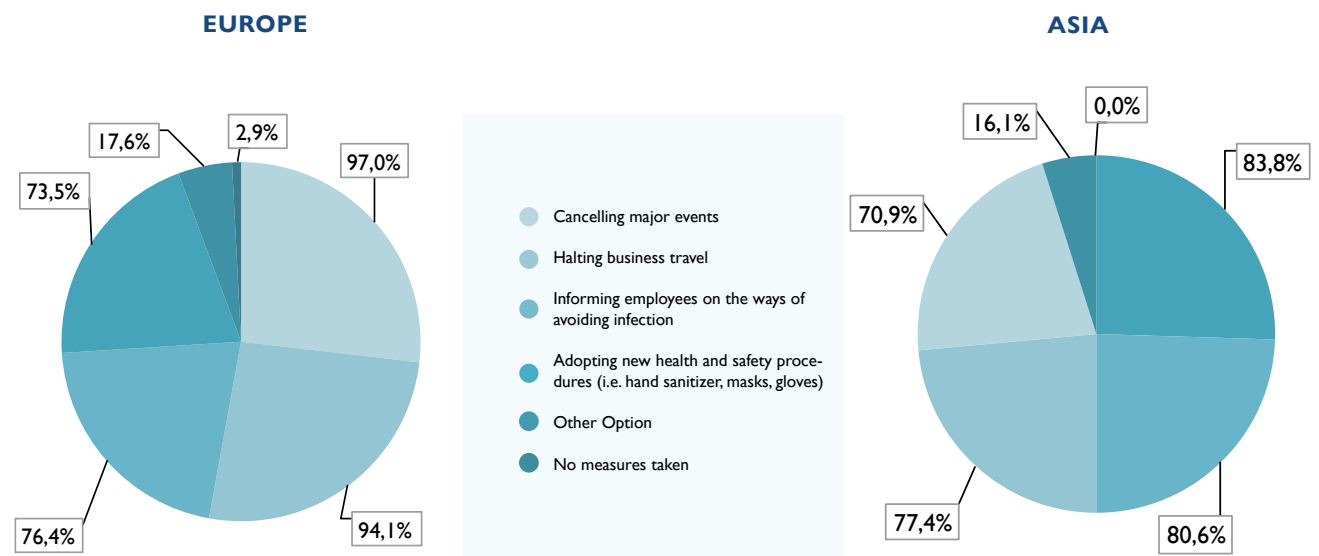
avoid infection, halt business travel and adopt new health and safety procedures (i.e. hand sanitiser, masks, gloves), and provided staff with the office computer equipment. Some respondents also mentioned remote work as a way of coping with the issues.



MEASURES TAKEN TO COPE WITH THE NEW CHALLENGES

Ensuring the quality of education while conducting external reviews remotely has become the biggest problem for the agencies. This raises the question of whether the accreditation decisions made remotely are valid. More than half of the European agencies (58.8%) consider

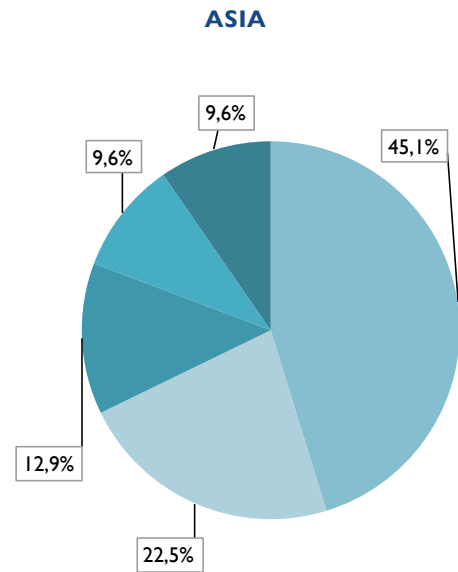
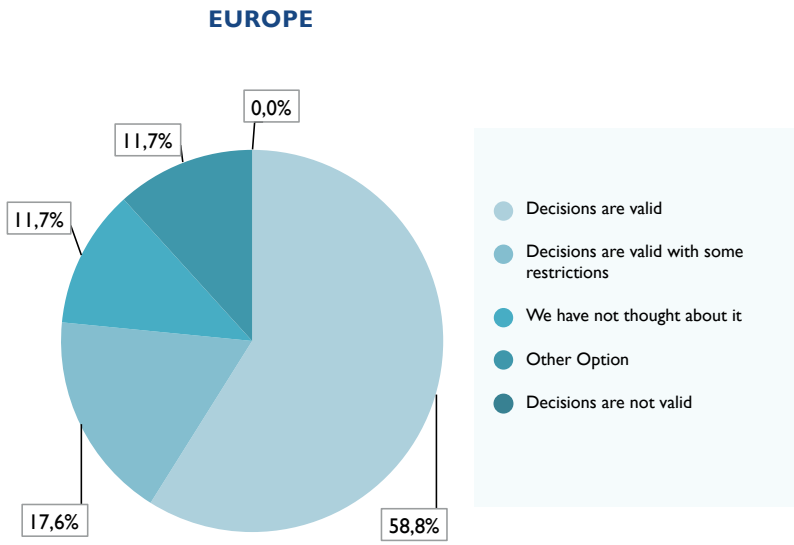
them valid while Asian agencies consider them valid with some restrictions (45.1%). Those who chose the “other option” noted that they do not make any decisions as external reviews are not conducted.



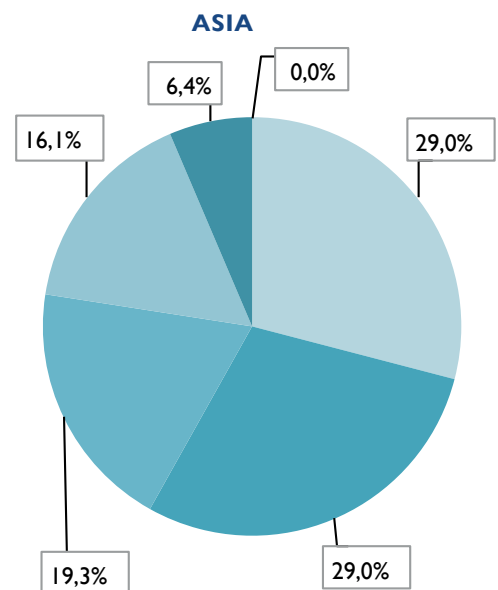
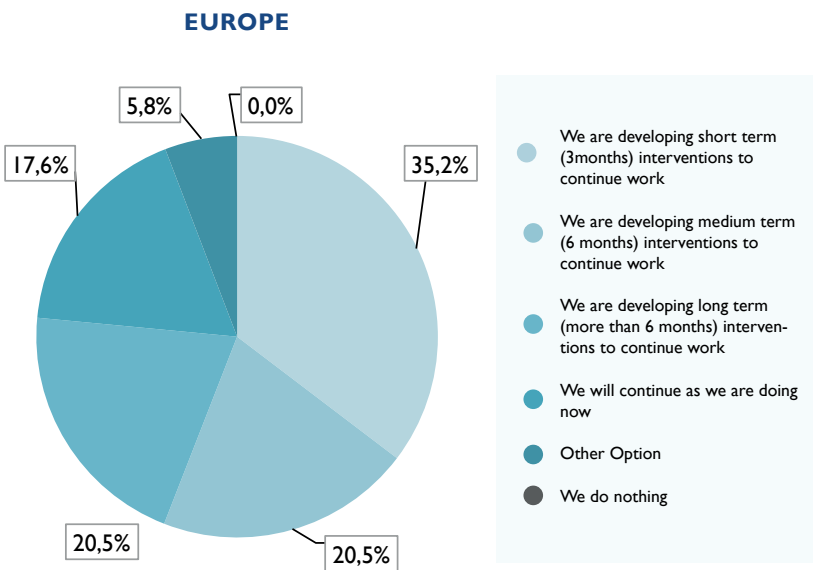
ARE ACCREDITATION DECISIONS MADE REMOTELY VALID?

The agencies were also asked about their plans for the future in case the impact of Covid-19 extends beyond three months from the moment when initial changes were implemented. The majority noted that they are developing short-term (3 months) interventions to continue work (35,2% - Europe, 29% - Asia). Some will

continue as they are doing now, others are developing medium and long-term interventions to continue work. One of the agencies is developing short-term (almost weekly) interventions to continue work following government decisions.



PLANS FOR THE FUTURE IN CASE OF AN EXTENDED COVID-19 IMPACT





Modern technologies allowed people to work remotely and made accreditation procedures more flexible ●

Concluding findings

The Covid-19 pandemic has become a challenge that no one could expect, and no one had time to prepare for. Quality assurance agencies have been forced to quickly switch to online accreditation. It has resulted in new issues and the use of other methods and tools to carry out evaluation activities. The findings of the survey and NCPA's practices in times of crisis show that remote accreditation has its advantages and disadvantages.

Migration to the remote format required flexibility and prompt reaction from staff of the agencies, experts and higher education institutions. Extra effort, time and technical capacities were necessary to provide effective communication that would not lower the quality of the review. Preparation for the meetings, making guidelines and providing technical support also required extra hours. The first meetings of the online site visits showed that the number of participants should be optimised and should not exceed 5-8 people; and the length of the review should be extended to allow additional time for the solution of technical problems and communication of experts. Another issue of a remote procedure is a complicated search for stakeholders (employers and students) to participate in accreditation procedures as they are absent from the workplace and place of training. The load on the staff of the agency has significantly increased: it is necessary to make adjustments to the regulatory documents and provide comprehensive consultancy to higher education institutions and experts. However, the main task is to maintain the quality of all procedures and help educational institutions to demonstrate quality of their performance.

The main problem is that it is more difficult to conduct external reviews in the current situation as it is time-consuming, requires a lot of preliminary work, and offline site visits, which give a lot of information about a higher education institution, cannot be conducted. The quality of the review depends heavily on technologies and equipment (internet access, quality of connection). Some higher education institutions have a cautious attitude to online accreditation as an incomplete procedure. There is also a risk of decline in demand for accreditation procedures due to the economic consequences of the pandemic. Another matter of concern is whether online accreditation would be used in the future and whether accreditation decisions made during the pandemic would be considered as fully valid as they were before the virus outbreak.

However, the situation does not have only negative consequences. The survey shows that the majority of quality assurance agencies managed the situation quite successfully despite all the negative consequences. Online is trendy nowadays. Modern technologies allowed people to work remotely and made accreditation procedures more flexible. They can be conducted under almost any weather, sanitary and epidemiological, social and economic conditions. As for the international experts, there are no geographical limitations. All they need is access to the internet and computer equipment. Online procedures are also time-saving to some extent, because experts have no time for distraction; they provide for greater involvement and discipline. Remote accreditation also saves money and time that are usually spent on travel and accommodation.

The Covid-19 pandemic has made higher education institutions and quality assurance agencies redesign their usual ways of operating. While before the virus most educational organisations already applied the technologies of e-learning to some extent, quality assurance agencies faced remote accreditation for the first time. Due to the lack of policies, standards and methods for such a procedure, accreditation has become a complicated issue. However, new conditions have brought new experience, which can be further used in quality assurance of higher education (for example, using a remote format for site visits when one of the experts is not able to attend in person). Online accreditation procedures have become a good alternative to regular reviews in the current situation. However, the issue of whether offline accreditation is fully replaceable by remote accreditation is open to question.

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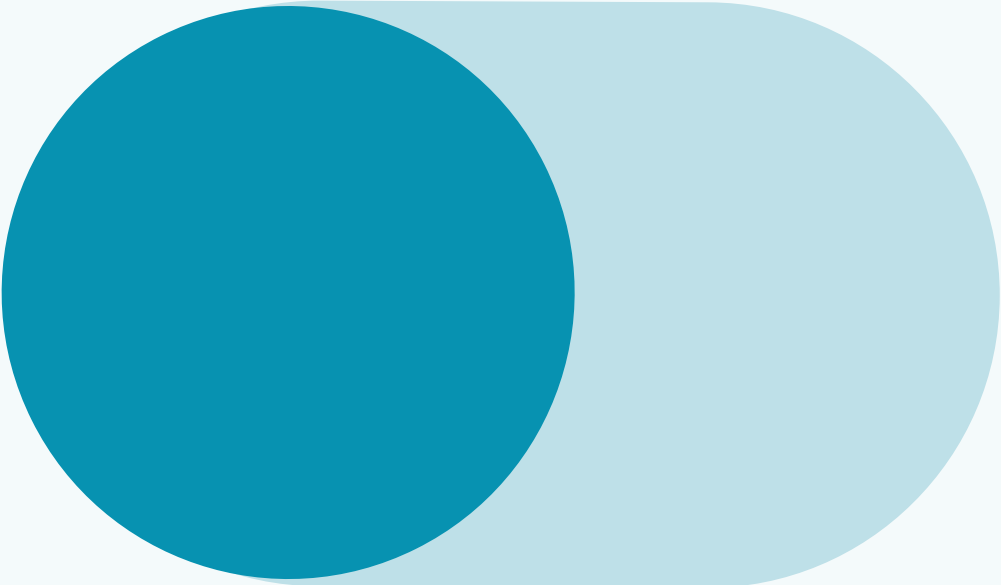
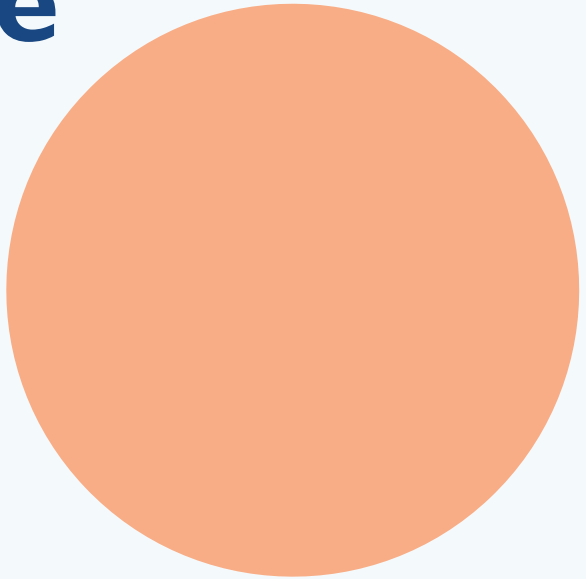


Towards a development- oriented approach to programme assessment:

a Dutch case study

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Introduction

In September 2016, the Dutch accreditation agency NVAO issued an updated Assessment Framework for the Higher Education Accreditation System of the Netherlands which, in line with both national and international developments, placed the notion of trust in the proven quality of institutions and programmes more firmly than ever before at the heart of the Dutch quality assurance system. The track record of Dutch higher education programmes and institutions being an overwhelmingly positive one, as the many hundreds of evaluations over the years had shown, tipping the scales confidently in favour of trust rather than accountability proved a natural and, indeed, welcome development. In February 2018, a new update of the accreditation framework – effective to this day – was introduced, which placed further emphasis on trust in the quality of the Dutch higher education system by, alongside other reforms, allowing for the accreditation of programmes for an indefinite period of time, rather than the six year period stipulated before.

In the “Introduction” to the updated framework, NVAO stresses that, in accordance with its trust-based policy, it not only “aims to endorse staff and student ownership of the programmes and institutions”, but also seeks to contribute to reducing the administrative burden of the accreditation process (NVAO, 2018). As a recent research report by the Dutch consultancy firm AEF has shown, there is a widely shared sense among those working in Dutch academia that their workload has been substantially increased in recent years due to the continuous introduction of new rules and regulations (AEF, 2019). This intensified bureaucratic pressure is, of course, not restricted to quality assurance and accreditation, but there is no doubt that for those involved in the accreditation process, given its complexity and what is at stake, it is often experienced as particularly intensive and burdensome. NVAO has responded to this by creating a flexible framework that, in principle, imposes relatively few specific requirements on programmes and institutions, allowing them, for instance, to demonstrate the quality of their educational offering to a peer review panel on the basis of existing documents only, rather than having to write an extensive self-evaluation report. In addition, the 2018 framework introduced a new element: the so-called development dialogue, which offers the peer review panel and representatives of the programme the opportunity to discuss potential improvements in a more casual and relaxed setting, without formal consequences for the outcome of the accreditation process.

The question then arises, in how far the framework’s increasingly pronounced emphasis on values like trust, self-confidence and development, in combination with the flexibility and room for manoeuvre it offers, has achieved tangible results. In order to answer that

The 2018 framework introduced a new element: the so-called development dialogue

question, an article by Sietze Looijenga, managing director of Qanu from 2013 until 2019, provides an instructive starting point.¹

Increasing trust, reducing the administrative burden

In 2018, about a year and a half after the publication of the 2016 framework, Sietze Looijenga, the then director of the Dutch quality assessment agency Qanu, published an article in which he discussed the notion of trust in relation to reducing the administrative burden of the peer review process (Looijenga, 2018). Looijenga argued that the goals specified in the framework were hardly new, as they had already featured – though less prominently – in previous versions of the framework and numerous discussions among Dutch higher education stakeholders. Furthermore, he signalled that it was far from self-evident that institutions and programmes would avail themselves of the opportunities offered by the framework as a result of the very nature of the site visit as part of the peer review process. In his view, more often than not, a site visit was apt to be viewed in the light of an exam, resulting in a pass or fail issued by a panel whose moods, preconceptions and inclinations needed to be monitored and manipulated as assiduously as possible in order to avoid a potentially disastrous outcome. After all, the repercussions of such an outcome may continue to haunt a programme or institution for many a year to come. This makes the site visit a locus of high tension at risk of focussing on telling the panel what it supposedly wants to hear rather than on what it needs to hear in order to make the audit a valuable experience in terms of development and improvement. As a consequence, preparations are intensified in order to cater for any eventuality that might arise during the

¹ Sietze Looijenga (1963-2019) was director of Qanu from 2013 until his unexpected death in 2019. He was widely recognised as one of the main authorities on the Dutch quality assurance system in higher education.

site visit, resulting in an increased workload for academic and administrative staff, not to mention much redundant paperwork.

The solution Looijenga proposes is to reduce this tension by informing the programme of the outcome of the peer review panel's deliberations before the actual site visit. In this way, the visit should no longer be experienced as an exam, with the programme's future potentially hanging in the balance. Rather, panel and programme will be able to engage in an open, constructive dialogue, focussing on development and improvement rather than accountability. Looijenga argues that this approach is actually much closer to current practice than might be expected. Panel members already form a preliminary assessment on the basis of the documentation with which they have been provided. This assessment essentially answers the question whether a programme does or does not meet the required standard for accreditation. The subsequent site visit serves primarily to verify or add to the information the panel members have already received by consulting the relevant programme stakeholders (i.e. students, teachers, administrators, committees), giving them the opportunity to add depth, colour and detail to their earlier impressions. Only rarely does a panel deviate substantially – and negatively – from its initial, document-based assessment. Why not then, Looijenga posits, go to the full length of announcing the panel's assessment ahead of the site visit, and thereby, in effect, transform the overall visit into an extended development dialogue in an atmosphere of genuine trust?

Of course, for this approach to be effective, it is crucial for the panel members to be provided with sufficient documentation to arrive at a valid and adequate assessment. Looijenga stresses that a programme with properly functioning internal quality control mechanisms should already have the required documents readily available. In addition, rather than write an extensive self-evaluation report, programmes may decide to write a brief addendum to the proffered documentation so as to contextualise it and offer a limited SWOT analysis. The operative words here are “brief” and “limited”, in view of the focus on the reduction of the administrative burden. Looijenga ends his article by suggesting that in order to assess the validity of his ideas and to translate them into carefully thought-through procedures, it would be necessary and worthwhile to put them to the test in actual practice.

Pilot project : preparations, site visit and digital challenges

A pilot project started by Qanu in collaboration with Wageningen University & Research (WUR) in December 2019 for the BA and MA Biology programmes aimed to

do exactly that.² The project's goal, following the lead given by Looijenga, was to assess whether a so-called development-oriented approach to peer review would result in 1) a reduced – actual as well as perceived – workload; 2) a more adequate assessment of the quality of the programme under scrutiny; and 3) an improved contribution to the development of the programme's quality and quality assurance.

The pilot project was based on the following assumptions:

1. The preparation for the peer review process and site visit is based on trust in the quality of the programme, placing the programme in the lead.
2. A lengthy self-evaluation report is not required. Rather, the assessment is based on existing documents, with the panel receiving reading instructions as well as a brief SWOT analysis.
3. On the basis of these existing documents, the panel will announce its preliminary assessment well ahead of the site visit.
4. On the basis of the site visit, a brief evaluation report will be produced, substantiating the panel's assessment of the programme in accordance with the standards stipulated by the NVAO framework and outlining the panel's ideas as to the further development of the programme.

A project team was formed led by the director of the WUR Biology programmes and the Qanu project manager.³ In addition, a sounding board group was installed in which various stakeholders in the accreditation system in Dutch higher education were represented, including a student representative as well as a senior NVAO official.⁴ The latter deserves special mention, as the project specifically set out to explore the leeway offered by the NVAO assessment framework and it was important to be assured of the NVAO's full support. In addition, it was decided to enlist the services of an independent researcher to monitor the process closely, contextualise it in the light of research and (inter)national developments, and offer an objective assessment of the outcome of the project.⁵ Finally, all members of the peer review panel declared themselves in agreement with the proposed approach.⁶

The site visit was planned to take place in April 2020, but then Covid-19 intervened, and for a while it seemed

2 We would like to express our sincere gratitude to all those who made this project a reality.

3 Ir. Marjolijn Coppens (WUR); Dr. Alexandra Paffen (Qanu). It was Dr. Paffen who took the initiative for this project and has been the driving force behind it for Qanu.

4 Kees Gillesse (ISO); drs. René Hageman (NVAO).

5 Drs. Bianca Leest (KBA Nijmegen). This article is mainly based on the input and feedback provided by Dr. Paffen and drs. Leest.

6 The panel chair is Prof. dr. Stanley Bruls (UvA). On behalf of Qanu, Dr. Els Schröder acted as secretary to the panel.

that the project might be postponed indefinitely. After the announcement by NVAO that, under specific conditions, online site visits were permitted after all, the panel chair, the WUR representatives, the researcher and the sounding board group were consulted as to the viability of a digital site visit. Three scenarios emerged:

1. The discussion of the preliminary findings would leave no doubt in relation to a positive assessment. In this case, the panel would issue a preliminary positive assessment and the digital site visit would focus on verification and clarification of their findings.
2. The assessment would prove inconclusive, in which case the panel would meet physically with a selection of representatives from the programmes to check if a conditionally positive verdict – and therefore a full physical site visit – might yet be avoided.
3. The panel would issue a negative verdict, in which case a full physical site visit would be required.

The first scenario is the one that was eventually put into effect. In all three of these cases, it was decided that the development dialogue would be postponed until a later date, due to the generally shared sense that a physical meeting would foster a more constructive and open discussion, in line with the goals of the development dialogue.

Transforming a physical site visit into a digital one proved an interesting challenge. As it turned out, careful and deliberate planning is required to make online meetings workable and effective. It proved crucial, for instance, to leave sufficient time between the various meetings, and to have a clear protocol in place to ensure adequate participation for every speaker. Also, a full day of digital meetings proved substantially more fatiguing than a day of regular, physical meetings. Splitting a site visit into two separate, half-day sessions is therefore advisable. A physical site visit is always preceded by a preliminary meeting at which the panel receives instructions from the panel secretary with regard to the procedural aspects of the visit. It became clear that a digital site visit requires detailed attention to conversation management and that the panel members need to be instructed accordingly. How to ask open, development-oriented questions? How to ensure that all conversation partners are allotted their fair share of time? In other words: the panel requires more in-depth, detailed instruction in order to ensure an open dialogue between panel and programme. This is especially true when the digital medium used for the visit does not allow the chair to see more than a limited number of participants on screen.

Preliminary findings

In how far has this pilot project proved successful in terms of meeting the goals formulated at the outset,

also taking into account the additional challenges posed by the digital format of the site visit?

As for reducing the preparatory workload, the WUR programme director has confirmed that in the run-up to the site visit, this was, in fact, the case. Preparing a brief SWOT analysis rather than a full self-evaluation report, and being invited to provide the panel with existing documentation only, did prove less time and energy consuming than the “traditional” approach. Also, on the basis of the testimonies provided by the representatives of the programme, it is safe to conclude that being informed of the panel’s assessment ahead of the site visit made a significant contribution to reducing the kind of counter-productive tension identified by Looijenga.

As for the panel, the initial expectation that the members would need more time to familiarise themselves with the available documentation was confirmed. In future, this might be prevented by providing panel members with more detailed reading instructions and by ensuring that the material is scanned for relevance and readability even more carefully beforehand. The panel was also unanimous in indicating that a more extensive SWOT analysis would have proved helpful, without going to the length of requiring a full self-evaluation report. Both the programme representatives and the panel members concluded that having access to existing documentation only gave a more authentic impression of the nature and quality of the programmes. Quotes from the first brief analysis after the pilot included such statements as “more true view”, “just as we are now”, “you learn more, you get a better feeling”. An additional advantage of basing the peer review process on existing documentation is that it stimulates programmes and institutions to keep their affairs in order, and to reflect systematically on the outcomes and effects of their internal quality assurance procedures.

At the time of writing this article, the development dialogue has only recently taken place (July 2020) and there has not been time to do a full analysis yet. The initial impression here, however, is that both the panel members and the representatives of the programmes were particularly appreciative of the fact that the session was not held immediately after the digital site visit but after an interval of several months. This meant, for one, that the final evaluation report for the benefit of NVAO had already been written, and the programme director was able to invite the panel’s input on specific points mentioned in the report. Also, the interval more generally allowed for additional reflection on the site visit, and the dialogue itself, as separate from that visit, took place in a relaxed atmosphere, beneficial to an open and development-oriented exchange of ideas.

On a more critical note, it could be argued that in this pilot project, the only part of the peer review process

that was specifically development-oriented was the concluding development dialogue, so that the site visit itself was experienced by both the programmes' representatives and the panel members as a – more or less – regular visit, albeit one at which the panel's findings were available to the programmes in advance. In that sense, Looijenga's vision of trust-based, development-oriented quality assessment has not been fulfilled yet. The challenge remains to manage a programme assessment in such a way that a site visit may be even more comprehensively devoted to the development and improvement of the programme in question to the extent that a separate development dialogue might ultimately become redundant. However, as this article has tried to demonstrate, useful and productive steps in this direction are already being taken, and there are encouraging signs that several more programmes are preparing to follow the lead taken by the WUR Biology programmes. To do so requires more than a little self-confidence, but if the history of higher education quality assurance in the Netherlands can tell us anything, it must be that such trust in one's own ability to deliver high standards in education is, by and large, amply justified and therefore deservedly recognised by the Dutch accreditation authority in the current assessment framework.

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Lifelong learning in QA:

the AAC-DEVA experience in assessing quality of doctorate programmes

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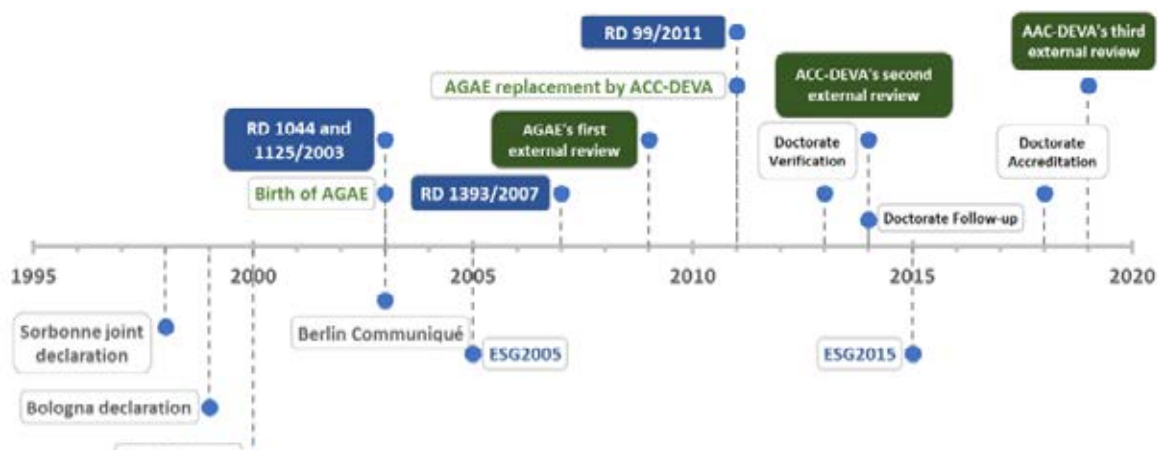


Figure 1. Major milestones in EHEA constitution (bottom) and in Spanish legislation and Andalusian quality assurance (top).

Introduction

Since the signature of the Bologna declaration (1999), which represents the formal constitution of the European Higher Education Area (EHEA), each member country has developed its own roadmap to adapt their national system to a common two-cycle degree structure consisting of a first (undergraduate or Bachelor) and a second (graduate or Master) cycle. In 2003, the Berlin Ministerial Communiqué defined doctoral programmes as the third cycle in higher education setting the final three-cycle degree system.

In Spain, the responsible Ministry has been legislating on the adaptation of the Spanish university system to the EHEA since 2003 (Figure 1). The establishment of the European Diploma Supplement (Royal Decree 1044/2003) and the European Credit Transfer System (ECTS; Royal Decree 1125/2003) were the first steps. In 2007, the Royal Decree 1393/2007 adapts the organisation of official university education to the three-cycle system and establishes the internal and external evaluation of educational programmes, in line with the *Standards and Guidelines for Quality Assurance in the EHEA* (ESG), in a three-phased evaluation cycle: ex-ante or verification, intermedium or follow-up, and ex-post or accreditation renewal. These evaluations are conducted by the competent agency, which is determined by the Autonomous Community, provided they are registered in the European Quality Assurance Register (EQAR). Moreover, the same Royal Decree establishes that

“The renewal of the accreditation of official university degrees will be carried out within the following deadlines: a) Official Bachelor’s degrees of 240 ECTS must renew their accreditation within the maximum period six years. b) Official Bachelor’s degrees of 300 ECTS must renew their accreditation within a maximum period of seven years. c) Official Bachelor’s degrees of 360 ECTS must renew their accreditation within a maximum period of eight years. d) Official Master’s degrees must renew their accreditation within a maximum period of four years. e) Official Doctorate’s degrees must renew their accreditation within a maximum period of six years”.

In 2011, the Royal Decree 99/2011 developed the third cycle (Doctorate) in line with the foundations of the Revised Lisbon Agenda (The Lisbon Strategy in short, 2005) as well as the construction of the European Research Area (ERA) (ERA, 2020). The main purpose is that the doctorate plays a fundamental role as an intersection between the EHEA and the ERA, which are both fundamental pillars of the knowledge-based society in Europe.

Simultaneously with the legislation, the Spanish Network of Agencies for University Quality Assurance (REACU) developed a common framework to assess the quality of higher education programmes and higher education institutions. In Andalusia, the Andalusian Act of Universities (Act 15/2003, of December 22) provided the creation of the Andalusian University Evaluation and Accreditation Agency (AGAE), whose competences in higher education evaluation were assumed by the Directorate of Evaluation and Accreditation (DEVA)¹ of the Andalusian Agency of Knowledge (AAC) in 2011. This Agency is a member of ENQA, has been externally reviewed three times, is registered in EQAR since 2009, and has its evaluation reports published in DEQAR. Besides quality assurance activities related to programmes and higher education institutions, AAC-DEVA also evaluates higher education institution staff and research, development

1 See the website here: <http://deva.aac.es/?id=&LAN=en>



Figure 2. Distribution of universities in Andalusia.

and innovation projects and groups, being a major player in the Andalusian Knowledge System.

The current Andalusian University System (SUA) consists of eleven Andalusian universities: ten public, representing 20% of the Spanish Public University System, and one private. These universities are distributed across the territory with at least one public university in every province. In addition, the University of Granada has campuses in Ceuta and Melilla (Figure 2).

For the next academic year 2020/21, the SUA provides a total of 599 Bachelor and 808 Master degrees and 171 doctorate programmes (Table 1). The oldest public universities, Granada and Seville, offer the highest number of degrees.

University	Bachelor	Master	Doctorate	Total
Almería (UAL)	34	52	14	100
Cádiz (UCA)	77	69	19	165
Córdoba (UCO)	53	72	11	136
Granada (UGR)	96	187	28	311
Huelva (UHU)	38	48	11	97
Jaén (UJA)	50	68	20	138
Loyola Andalucía (LA)	23	19	3	45
Málaga (UMA)	72	86	22	180
Pablo de Olavide (UPO)	47	50	9	106
Sevilla (USE)	109	140	32	281
UNIA	0	17	2	19
Total	599	808	171	1578

Table 1. Distribution of official Bachelor and Master degrees and doctoral programmes at Andalusian universities in 2020-21. Sources: Distrito Unico Andaluz (Acceso a la Universidad, 2020) and University Loyola Andalusia website (Programas de Doctorado, 2020).

The evaluation of Andalusian university degrees started in 2009 with the verification and follow-up processes of the Bachelor and Master degrees. In 2017, in accordance with the ESG standard 3.4 “Thematic analysis”, AAC-DEVA held a seminar entitled Analysis and evaluation of verification, follow-up and accreditation cycles of official bachelor’s and master’s university degrees in Andalusia (2009-2016), which aimed to favour open participation and debate among stakeholders involved in the process of transformation of the academic offer at Andalusian universities. A report with a detailed analysis of results and performance, including future improvement measures was published.² Doctorate programmes started the verification process in 2013 and completed the first accreditation cycle in 2018.

Design of the evaluation guide for doctoral programmes accreditation

According to the criteria and guidelines for the evaluation of the accreditation of Bachelor, Master and doctoral

degrees established by REACU in 2014, the aims of the accreditation of the official doctoral programmes are to:

- assure the quality of the doctoral programme according to the established standards and criteria dictated by the current legal regulations;
- guarantee that the results obtained by the doctoral programme meet the commitments acquired by the higher education institution during the verification process;
- verify that the doctoral programme has an appropriate follow-up and that the available quantitative and qualitative information has been used in order to analyse its progress and to implement improvements;
- assure the availability and easy access to public, valid, reliable, applicable and relevant information, which is useful for students and other users; and
- provide recommendations for improvement that support the internal processes for quality assurance of the doctoral programme and its development, which will be considered in the future follow-up process and accreditation.

According to these principles, the experience gained during the Bachelor and Master degree accreditation, and long before that the first accreditation process for doctorate programmes was launched, AAC-DEVA set up in 2014 a working group to discuss and agree on indicators for doctorate programme assessment, to design the process and to develop the accreditation guide. The working group held an intense debate focussed on conceptualising and differentiating the most unique aspects of a doctorate compared to undergraduate and Master training programmes. In line with other AAC-DEVA programmes and the ESG 2015, accreditation of the doctoral programmes is based on seven criteria:

- I. **AVAILABLE PUBLIC INFORMATION.** The doctoral programme features and results and the actions taken to ensure quality are adequately communicated by the university. Key evidences and indicators: doctoral programme website and the procedure to keep it updated, satisfaction of stakeholders.
- II. **INTERNAL QUALITY ASSURANCE SYSTEM.** The programme has a formally established Quality Assurance System, which is implemented with the necessary mechanisms to obtain information about the degree’s establishment process and is focussed on continuous improvement. Key evidences and indicators: Quality policy and objectives for doctorate programmes, documented procedures, data of indicators and improvement plans.

² A full copy of the report can be found here: http://deva.aac.es/jornadas/analisisyevaluacion/pdf/documento_base_en.pdf

III. DESIGN, ORGANISATION AND PROGRESSION OF THE EDUCATIONAL PROGRAMME.

The design of the doctoral programme (lines of research, skills profile and educational activities), is progressing in an adequate manner, in accordance with the latest verified report, and it is adjusted to the academic level required by the Spanish Qualifications Framework for Higher Education (MECES). Key evidences and indicators: internal follow-up memory, formative plan for doctorate students, internal regulations about thesis defence, student satisfaction.

IV. TEACHING STAFF. The academic staff is sufficient; they have dedication, experience and qualifications that are consistent with the doctoral programme in accordance with the scientific field and the number of students. Key evidences and indicators: funded research projects in each research line, staff associated to each research line and their scientific contributions.

V. FACILITIES, SERVICES AND RESOURCE ALLOCATION. The available material resources and services are adequate for the progression of the programme, in accordance with its features, scientific field and number of students. Key evidences and indicators: research budget, higher education institution facilities and student satisfaction with resources.

VI. PROGRAMME RESULTS. The doctoral thesis, academic activities and evaluation are consistent with the programme's academic objectives. Key evidences and indicators: student formative programme, results of research (publications, patents, etc.), student and staff satisfaction.

VII. INDICATORS. The satisfaction and performance indicators and the information about the employment status provide useful information for the decision-making process and the improvement of the programme. The complete list of key indicators can be consulted in the accreditation guide (AAC-DEVA, 2017).

The assessment of the criteria is based on four levels:

- A. Passed with excellence.** The corresponding standard for the criterion has been reached completely, providing an example that exceeds the basic requirements. The evidence shows that the achievements in this criterion surpass the required standard. The university stands out in a remarkable manner in the assessment of this criterion.
- B. Passed.** The corresponding standard for the criterion has been reached. Evidence shows that the

university meets the assessment criteria in a significant manner. However, there is some space for improvement in order to reach excellence.

- C. Partially passed.** The minimum standard is met but some specific aspects must be improved. Evidence shows that the university meets the minimum standard of assessment but there are limitations, and some aspects can be substantially improved. It is mandatory to have an improvement plan that must be conducted and reported during the monitoring of subsequent courses. During the claims period, the universities will have the opportunity to design a specific action plan focussed on the improvement of the criteria that obtained a low result. The expert panel will evaluate the relevance and viability of the action plan and might reassess the necessary criteria.
- D. Not passed.** The minimum standard is not met. Evidence shows a low level of achievement in the assessment criteria. Substantial modifications are necessary to reach a minimum standard; motivation and thorough action plans are required to correct these deficiencies.

The accreditation is not granted if the result is “not passed” in any of the following criteria: IV. Teaching staff, V. Facilities, services and resources allocation, and VI. Programme results.

The accreditation of doctoral programmes in Andalusia (2013-2018)

The anticipation in preparing the accreditation process allowed AAC-DEVA to launch a pilot programme for doctorate accreditation in 2017 with the participation of 10 doctorate programmes, covering different scientific areas, from five Andalusian universities. Since most universities had received a site visit during Bachelor and Master degrees accreditation, AAC-DEVA tested for the first time the virtual visit in the accreditation process of doctorate programmes. Moreover, to minimise risks, particularities of each doctorate programme, such as the area of knowledge, were taken into account in order to assign a virtual visit. The methodology for the virtual visit was defined jointly by AAC-DEVA and the expert panels, which included doctoral students.

The analysis of the assessment of each criterion in the evaluation reports resulting from the pilot programme showed that, even if all programmes passed, Criteria I and IV were those worse evaluated (Table 2). In particular, some aspects related to the doctorate programme webpage and the organisation of the research lines and the corresponding staff were areas of improvement highlighted by the expert panels.

	Passed with excellence	Passed	Partially passed
Criterion I	0	5	5
Criterion II	0	10	0
Criterion III	0	8	2
Criterion IV	0	6	4
Criterion V	0	10	0
Criterion VI	1	7	2
Criterion VII	0	9	1

Table 2. Results of the assessment of each criterion for the doctorate programmes participating in the pilot phase of the accreditation programme

In the satisfaction survey, both the expert panels and the higher education institutions stated their satisfaction with the evaluation planning, the technical support provided by AAC-DEVA and the composition of the expert panels. While the virtual site visits were run smoothly and were well accepted, some doubts about the guarantee of unobstructed participation were raised.

The first official accreditation call for doctorate programmes was launched in October 2018 and resulted in the participation of 107 doctorate programmes from nine universities. On this occasion, all universities experienced a virtual visit. Results show that the criteria related to the internal quality system (II), the organisation of the programme (III) and the indicators for the evaluation of the results (VII) were not fully achieved by most doctorate programmes (Table 3).

	Passed	Partially passed	Not passed
Criterion I	8	99	0
Criterion II	10	86	11
Criterion III	41	56	10
Criterion IV	35	71	1
Criterion V	50	56	1
Criterion VI	36	70	1
Criterion VII	6	15	86

Table 3. Results of the assessment of each criterion for the doctorate programmes participating in the first official call for accreditation.

A major commitment of the higher education institutions with the implementation of an effective internal quality assurance system and the use of the generated information for improvement were key elements highlighted in the evaluation reports.

In most cases, mandatory improvement plans were required to pass the accreditation process and one doctorate programme was not granted accreditation.

The current situation of doctoral programmes in Spain and Andalusia and challenges ahead

The establishment of evaluation and accreditation methodologies, together with the consolidation of quality assurance systems adapted to the uniqueness of the third cycle, are contributing to the advancement and improvement of the doctoral training processes and the quality of the results derived from the doctoral career. Some indicators of the success of doctorate programmes in Spain are:

- Reduction in the time needed to prepare and defend the doctoral thesis. The average time has been reduced from 6.1 years in 2015 to 3.9 years in 2018. This results in early incorporation of highly educated people to the labour market.
- Reduction in the age of the doctoral students. In 2018, 59.4% of doctoral theses were presented by people under 35 years while in 2019, 24.0% were under 29 years.
- Increase in the number of students enrolled in doctorate programmes. As shown in Figure 3, the number of students enrolled in doctorate programmes continues to increase since 2015 in Spain and in Andalusia. In the academic year 2018-19, there were more women than men enrolled in doctorate programmes.

The inclusion of doctorate programmes in the three-step assessment cycle results in some relevant changes in the organisation and development of the third cycle in higher education in Spain:

1. Reduction in the number of doctorate programmes (Figure 4). The doctorate model has evolved from a fragmented, dispersed and heterogeneous system based on “micro-doctorate” programmes focused in specific subjects to more interdisciplinary and knowledge area focussed programmes. The ex-ante accreditation verifies the inclusion of research groups with a solid background, international projection, competitive financing, and publications in prestigious scientific media in the doctorate programmes.
2. Changes in the formative model, which has moved from the traditional classroom style to a more

flexible, dynamic, international and student-centred model.

3. Changes in the organisational model. Most universities have opted for the creation of doctoral schools to manage all doctorate programmes in a centralised way, which constitutes the most profound structural reform.
4. Contribution to the establishment and re-organisation of strategic research lines in higher education institutions. The research lines are the pillar of a doctorate programme. In verification, they have to be explicitly defined, which has helped the higher education institutions to organise the research groups and to promote collaboration with other research centres. Most of the modifications of doctoral programmes in Andalusia are related to the inclusion or removal of research lines in line with the institutional strategy and the research project success in competitive calls.
5. Promotion of the quality culture. Standardised assessment and accreditation processes similar to those implemented at the levels of Bachelor and Master degrees have been established and normalised in doctorate programmes. Moreover, the progress towards institutional accreditation models for doctoral schools similar to those applied to other university centres will contribute to enhancing the responsibility of the universities and their commitment to quality assurance.

Nevertheless, there are still important challenges ahead. Despite the main purpose of the EHEA to promote mobility, there are no international doctorate programmes in Andalusia and the origin of foreign students is mainly Latin America and the Caribbean (Ministerio de Universidades, 2020). Moreover, new models of doctorates less anchored in rhetorical-Aristotelian formats and more projected to the professional and industrial field need to be promoted and assessed accordingly (Cherkezishvili et al., 2020) resulting in a wider diversification of the criteria of excellence of the doctoral products that should be encouraged (Costley, 2013).

Quality assurance is a never-ending cycle in which doctorate programmes have been completely immersed in Andalusia and AAC-DEVA has been a pioneer in Spain in their accreditation. Although further improvement of internal quality systems applied to doctorate programmes is needed, there is no doubt that the internal and external quality assurance activities are contributing to enhance the quality of doctoral students and of research in Andalusia, Spain and Europe, reinforcing the European Research Area in respect of the rest of the world.

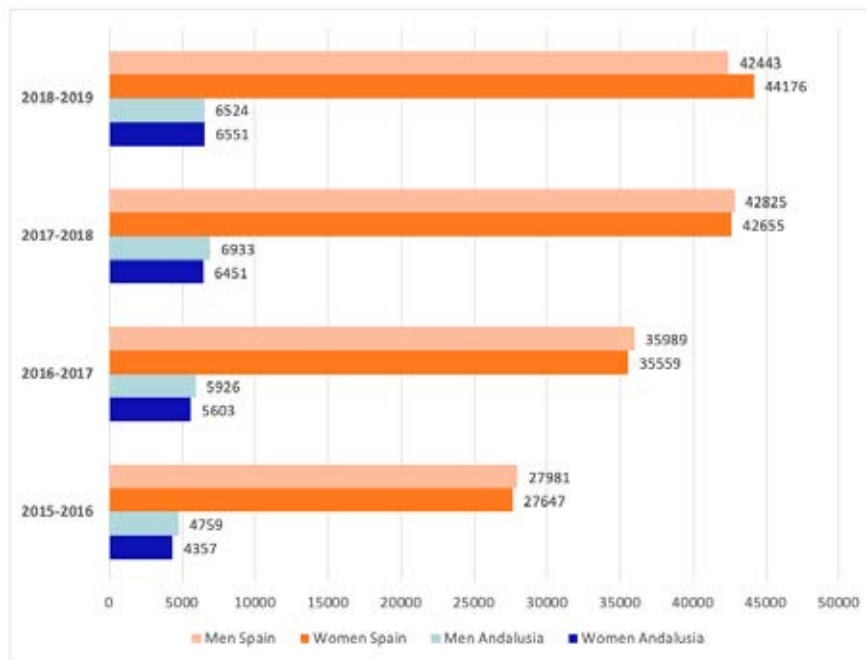


Figure 3. Number of students enrolled in doctorate programmes in Spain and in Andalusia in the last four academic years. (Ministerio de Universidades, 2020)

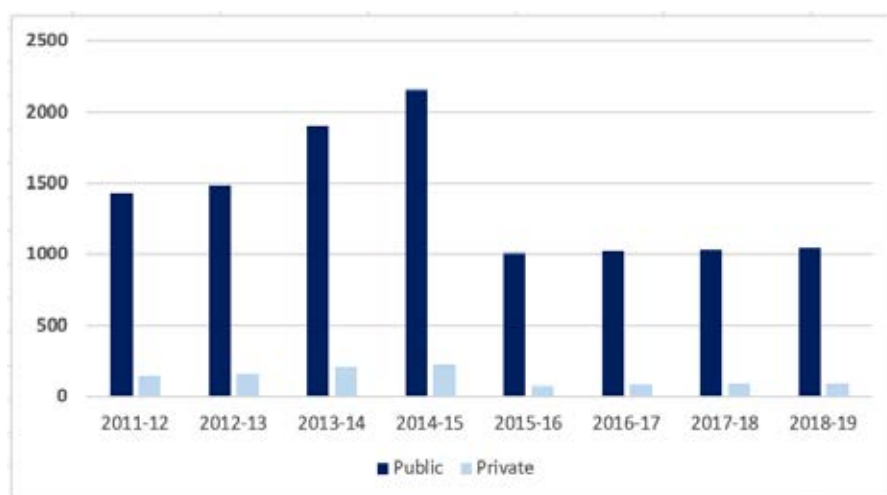
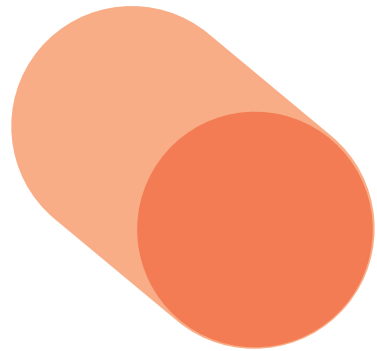
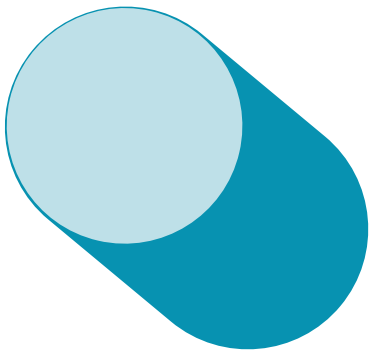
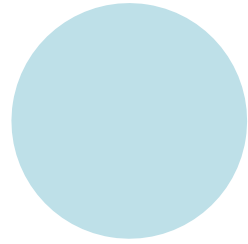
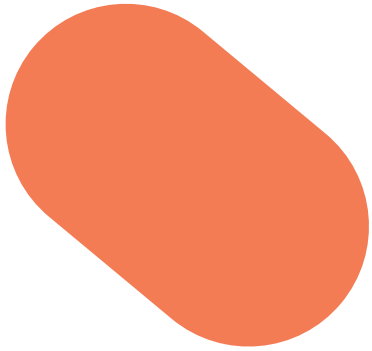


Figure 4. Evolution in the offer of official doctorate programmes by public and private universities in Spain. Source: EDUCAbase

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ENQA is a membership association of quality assurance agencies in the European Higher Education Area. This publication contains articles from the ENQA membership and former Board members and celebrates ENQA's contribution to higher education quality assurance over the past 20 years.



Co-funded by the
Erasmus+ Programme
of the European Union

ISBN 978-952-5539-94-3
ISBN 978-952-5539-95-0 (web publication)
ISSN 1458-1051