Seminar on "Methodological common instruments for assessment and accreditation in the European framework"
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Dear friends and colleagues,

After the excellent session we had yesterday, when we discussed "quality assessment", we will today focus our attention on the issue of accreditation. The separate treatment of these two subjects might easily give rise to the conclusion that these are apparently two entirely separate worlds. Yet this would be too quick a conclusion, and today I will try to convince you of the opposite. After all, accreditation cannot exist without quality assessment. A significant part of my argument will therefore to a certain extent overlap the outstanding contributions of yesterday. The reason for this is not that I don't have anything else to say, but that I don't want to say anything else. Accreditation and quality assessment are not each other's opposites, but rather two expressions of systems that pay serious attention to quality improvement and quality assurance.

1.Introduction

Let me begin by looking at some definitions of the term accreditation. In doing this, I'll base myself on a book, published in December 2003 in the Netherlands, to which Dirk van Damme, who most of us know very well, contributed an outstanding chapter on the build-up to and the consequences of Bologna.

Let us start with Van Damme's own definition: "Accreditation is a formal, public statement, made by an independent body and based on quality assessment, that certain previously agreed standards are realised". We will continue with a random selection of other definitions that were published by ENQA in 2001. The CRE's definition (dating from 2001): "Accreditation is a formal, published Statement regarding the quality of an institution or a programme, following a cyclical evaluation based on agreed standards". Then there is the definition of the CHEA (from 2000): "Accreditat ion is a process of external quality review used by higher education to scrutinise colleges, universities and higher education programmes for quality assurance and quality improvement". And another one, from the European Training Foundation, dating back to 1998: "Accreditation is the award of a status. Accreditation as a process is generally based on the application of predefined standards. It is primarily an outcome of evaluation". And finally a recent definition from an as yet unpublished book of Schwarz and Westerheijden: "Accreditation schemes are institutionalised and systematically implemented evaluation schemes of higher education institutions, degree types and programmes that end in a formal summary judgement that leads to formal approval processes regarding the respective institution, degree type and/or programme".

These five different definitions clearly have many points in common: accreditation is about a formal judgement that the quality of a degree course or an institution meets certain standards. This judgement is based on quality assessment. And precisely this necessary quality assessment shows that accreditation and quality assurance are connected.

2. Reservations against accreditation

So why then are there so many reservations and objections to accreditation? Why is there at times so much campaigning against accreditation, both on matters of principle and in pragmatic areas? I'll list the objections:

An objection of principle against accreditation is raised by those who adhere to the view that the higher education sector itself should be responsible for the quality provided by the sector. Their opinion is that each confident and mature economic sector must have a system of quality assessment in place that guarantees the quality provided by all parts of the sector. The sector should therefore not be inspected by outside bodies but by itself;

the second objection is that accreditation will by its nature lead to uniformisation. In view of in particular the legal consequences of a decision about awarding accreditation, the body responsible for the decision will have to be constricted by regulations, guidelines, criteria, benchmarks and such things in order not to run the risk of not treating equal cases equally. In its attempt to avoid this risk, accreditation is said to show a tendency towards uniformisation;

the third objection is related to the inevitable bureaucracy and extra costs that accreditation entails. In this view, the extra accountability has to result in additional procedures

and therefore to more paperwork and costs, which will be at the expense of the primary tasks of the institutions of higher education;

the fourth objection concerns accreditation processes and accreditation procedures that are perhaps too much focused on the national context. After all, one of the objectives of accreditation should be that it increases staff and student mobility. Due to the fact that the obligation to obtain accreditation is often spurred by national accountability mechanisms it could easily become very tempting to work with national frameworks and forget international coordination;

the fifth and last objection is again a matter of principle: accreditation (an external evaluation of quality) will cause extrinsic values in education (such as "society" and "the economy") to become more important than intrinsic (academic) values. As a result the quality system will end up in the hands of managers and administrators rather than those who should be the owners: those closest to the actual teaching.

3. And yet............

Despite these serious reservations, accreditation is introduced in an increasing number of European countries. The most significant considerations that lead to the decision to introduce accreditation are related to quality assurance and accountability.

The latter is clearly the result of changes in society, in particular in the relationship between the government and institutions of higher education. This change implies that the

institutions are given greater autonomy (out of conviction or for harsh economic reasons) in combination with obligations as regards accountability that at times border on the absurd. The most important question asked by the government on behalf of the tax payer – for in Europe most institutions are still predominantly government funded – is whether they give value for (the large amount of) money. And though until recently professors still took an unthreatened position at the top of the league of prestigious professions, higher education has now become strongly democratised due to a massive influx and the university[*], and therefore the professor, have become a much more common feature in society. This is one of the reasons why the blind trust in the universities' correct deployment of government means has crumbled.

This lack of trust transpires in a number of areas, including the area of quality assessment. The sector is apparently not or no longer sufficiently trusted to pass judgement on its own quality. For this reason the decision about the quality of institutions and courses is increasingly left to independent institutions and organisations. Many accreditation organisations are therefore structured as independent organisations that, though largely or wholly government funded, have to be able to reach a decision independently from this government.

An advantage for the government is that these decisions on accreditation may subsequently also be used for other political decisions. In the Netherlands, for instance, a positive

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[*] I am using the term university for all institutions of higher education, irrespective of whether the institutions concerned are research universities, universities of professional education or any other type of institutions.

decision on accreditation qualifies the relevant degree course for government funding, students of the course receive study grants and the institution that provides the course is entitled to issue degree certificates that are recognised by the government. A decision not to award accreditation has the opposite consequences.

In addition, decisions on accreditation can play a useful part in the information given to students, prospective students and the public at large. In Flanders, for instance, the public Higher Education Register lists degree courses that have been awarded accreditation by the NVAO.

Apparently, the current system of public administration requires mechanisms to carry out inspections, preferably by independent inspectors. By adopting such mechanisms, the state takes a distance, at times to such an extent or in so many areas that this itself is cause for some resistance. The inspectors together form a new echelon in the administrative domain, which either has to be under scrutiny itself or whose powers have to be limited when politicians want to take over primary powers again. But you may regard these last sentences as the words of someone who has his doubts about a possible democratic deficit, not as a contribution to the subject of today.

4. Forms of accreditation

The choice for a particular form of accreditation can be influenced by all kinds of policy objectives. One of them is the choice for the level at which decisions about accreditation are taken, as there is rather a difference between accreditation at

the level of institutions or accreditation of degree programmes. The Netherlands-Flemish Accreditation Organisation, for instance, awards accreditation to degree programmes, as it was felt in the Netherlands that it should be made possible for universities of professional education to provide academic courses and for universities to provide courses with a professional orientation. In addition, there was a certain distrust of universities that argued that accreditation at an institutional level would be good enough, as there was sufficient quality awareness within the universities to improve any less good courses. The problem is that accreditation of degree courses is very time-consuming. In the Netherlands and Flanders together there are some 4,000 courses!

For this reason other countries have decided in favour of the much less intensive form of accreditation of institutions. Such choices present themselves in other areas as well. Is accreditation voluntary or mandatory? Will it concern government-funded institutions only or does accreditation have to apply to all institutions that operate in the higher education sector? Does it concern absolute, yes or no decisions, or could one think of forms of accreditation that can impose conditions in terms of measures to effect improvement or in terms of the period of validity of decisions on accreditation? More importantly: is a decision on accreditation taken on the basis of a strict and normative assessment framework or is there room for diversity and distinctive profiles, which would mean that the assessment frameworks have to be broad and general?

The above shows that there are all kinds of decisions to take, which may result in different kinds of accreditations and

therefore may have consequences for the compatibility of the systems.

5. The ideal

We don't need to tell each other tales about quality assurance in higher education. Up until the eighties of the last century, just 20 years ago, the quality of teaching in higher education was paid relatively little attention. I don't think that the teaching was bad, but I do think that we were relatively indifferent about the performance both of ourselves and of our students. It was almost taken for granted that drop-outs were the result of a lack of effort on the part of the students and were hardly or not thought of in terms of a didactic model that was not up to standard or a mediocre didactic performance. I feel that the universities in particular were until that time basking in the relative self-satisfaction caused by centuries of experience.

There are three reasons why all this changed. Firstly, higher education went through a period of rapid democratisation from the end of the sixties, which meant that the elitist nature of the old universities underwent a drastic change and the slogan Higher Education for Many caught on in all western societies. In just a few years time, the influx into higher education doubled. And higher education was prepared for anything but a mass influx.

Secondly, in the seventies and eighties it became clear that economic growth was not a given fact, as many had hoped. This could also be felt in higher education. Up until then, university funding had in many countries been relatively automatically linked to the number of students, but the massive influx of students made this impossible. Institutions

of higher education now received considerably less funding per student, yet at the same time had to achieve better results, for society and the students themselves became much more critical about the quality delivered.

Thirdly, the massive influx, reduced funding and the urgent need for higher education graduates in society meant that more attention was given to educational reform. Experiments with Problem Based Learning at the McMaster University in Toronto in Canada were copied in many new universities, in particular in North-west Europe, including Aalborg, Maastricht and Warwick. Many more experiments were carried out as well, partly in response to the new opportunities offered by information and communication technology, in which open universities and distant-learning institutions play a stimulating part.

Quality assurance is therefore a relatively new phenomenon and we have had to gain experience with it. Student evaluations became common, teaching was considered a serious task and, consequently, was discussed in performance interviews and assessment interviews with staff, facilities expanded rapidly and were updated, and the development of didactic concepts was seriously considered. Quality assurance really gained momentum at the introduction of visitations in which external assessors scrutinised the teaching (and sometimes research) performance of course providers. Part of the visitation process was a self-assessment, carried out by the course providers themselves, in which a number of aspects were assessed, including the topicality of the course content, outcome of the course, staff quality, internationalisation and any other aspect of the course considered important.

These self-assessments and external visitations have given a tremendous boost to the quality of teaching. I am positive that the care and attention paid to teaching in the last decades have caused a dramatic increase in its quality. Without this attention higher education would certainly not have managed to accommodate such vast student numbers with the smaller contribution per student just mentioned.

On the other hand, I am also of the opinion that the visitation system has in many places not been able to keep quality assurance a priority within the organisation. We have not yet managed to create a culture of quality. Visitations have too often been a reason to deck out the circus again, and once the visitation report had appeared there would be a considerable risk that everybody heaved a sigh of relief and then moved on to the order of the day. This applies to many courses and institutions and although I would be the last to urge for even more paperwork, bureaucracy and silly rules, I am at the same time disappointed because the attention for quality assurance comes in leaps and bounds: only when an external assessment is looming will action be taken.

Ideally, institutions and degree courses work with a internal quality assurance system that is not only aimed at teaching-related processes and procedures, but that attaches great importance to the quality of the content of the programme. There are various systems, ranging from the ISO model, which is in my view unsuitable for the higher education sector, to advanced models of Total Quality Management. But every system would do as long as it follows the P – D – C– A – cycle. Let us look at this system once more. The institution or course has a plan or degree programme that it intends to carry out. It is

their purpose to achieve something with this plan or programme: there is therefore an objective, a profile or an ambition that will result in graduates who will be useful for society as a whole. The programme or plan is drawn up and carried out in a manner that the providers expect to lead to the desired result. As a matter of course, the provider keeps a watchful eye on this by means of monitoring: is the knowledge base up to standard, have correct skills been taught, are the competencies gained the proper ones to function adequately on the labour market? To establish this, the views held by the course providers, its graduates and the job market are very relevant. Based on measurements, views and evaluations, the programme or plan is then adapted: Plan – Do – Check – Act (or Adjust).

All this is not particularly complicated and should actually be an entirely normal course of action: a degree course serves a certain purpose and it is continuously checked whether its promises are still being fulfilled. And this obviously at a level that meets the standards of Bachelor's and Master's degrees internationally. In such a system the course would therefore constantly gather data about and experiences with the course and its graduates, as an intrinsic part of realising its ambition.

This is an ideal and not very complicated situation which might lead to a scenario whereby it should be possible to carry out an audit or visitation at any moment, in order to validate the ambitions and performance of a course. Once this situation has been achieved, simplified forms of quality assessment and quality assurance can be developed as well. Any debates about the frequency and level of aggregation would then become irrelevant.

6. The reality

But we are still very far off this situation. As so often, we have to make do with a reality that is at times a long way off the ideal. This is also the reason why the sector is not considered able to assess itself yet and ways, methods and systems are sought that will be able to give the required guarantees. It means that agreements have to be made about assessment frameworks, data collection, visitation protocols, validation instruments and the experts who have the competence to judge the courses and institutions that have to be assessed. I think that the experience of many years that has so far been gained with the system of external quality assessment in many countries has led to a high level of agreement on how such a system should function. A certain form of self assessment takes place, external experts validate this self-assessment, they draw up a report that is made public and contains recommendations for quality improvement of the degree course or institution. I also think that by now there is almost general consensus about the indicators to apply: it concerns objectives, the content of the programme, the quality of staff, the quality of the students, examinations and qualifications that have been realised, facilities and internal quality assurance. These subjects feature in greater or less detail in all protocols. The quality assurance gurus from the very beginning, including Vroeijenstein in the Netherlands, Van Damme in Belgium, those responsible for the QAA in the UK, the Northern European countries, the Hungarians, Czechs and other Central-European countries, generated this consensus by their many contacts, publications and experiences. There is therefore no particular problem with the indicators.

Neither is there a problem with the fact that visitation committees, panels or auditors assess the quality of courses or institutions as external experts. Yet a slight risk does present itself in this area; it becomes apparent if people wish to cast doubt on the ability of the higher education sector to assess itself. This is where "trust" is drawn into the equation and we again touch on the above-mentioned scepsis from the government and the public regarding the self-assessments that are propagated by the universities.

Let me give a few examples of such risks from personal experience. The peers are part of what is in fact a relatively small world of experts in a particular subject. As a consequence, the assessors and the assessed know each other. In particular in smaller countries this is almost self-evident. Is it odd in the given situation that visitation reports often only suggest improvements to certain matters with the greatest of caution? Is it odd that for instance the assessed's passion and enthusiasm for the course are made part of the weighting by the assessors? Is it odd that critical notes about a course are accompanied by remarks on the trust the assessors have in their colleagues? Is it odd that the assessors find it very difficult to mark components as unsatisfactory in reports that will be made public?

No, dear colleagues, this is not odd, but it isn't good either! We generally understand the risks carried by these assessments by peers and even respect them as fare as the improvement function of the assessment system is concerned, but in view of the increasing emphasis on accountability they are now considered undesirable. Both the composition of the panels, their training, and the way in which they arrive at their decisions therefore deserve ample attention.

Let us discuss the composition of the panels first. The panels and their individual members must meet the AIE-criterion: they must be Authorities, Independent and Expert. The panel as a whole must represent the domain of the course that is to be assessed, and possess the required didactic expertise, organisational and administrative expertise and expertise in auditing. This is quite a lot to ask, even more as in a number of countries panels must have international expertise and a student member as well. To arrive at a well-considered assessment it is in my opinion vital that the panel is able to verify whether the ambitions of the course are fulfilled. For this reason it is necessary that one or two members of the panel are given audit training. An interesting outcome so far is that great authorities in the academic world and experts from the absolute top of the business world sometimes tend to impose their own opinions as assessment criteria. This is in fact the opposite of what the purpose should be: the course programme has to state its aims and promises clearly and the panel has to assess whether these are achieved and fulfilled. It appears that some panel members take the Authority aspect of the AIE criterion very literally: in practice this now means that the NVAO sometimes prefers to deal with experts from the second highest echelon rather than with the absolute top! A serious flaw can be observed in the considerations and reasons underlying the panel's assessment. Too often the outcome of the assessment is worded along the following lines: "the panel considers .... satisfactory". However, if such assessments are to inspire confidence in the sector and the quality this sector claims to deliver, they must be convincing; nothing must be based on authority alone, but everything should be substantiated with clear argumentation.

This takes more time and effort and has given rise to much debate between the NVAO and the assessing organisations and panels in the Netherlands. The duty to state the reasons on which the outcome of the assessment is based has often led to the reproach that the emphasis on this aspect will drive up the costs of external assessment considerably. Yet this cannot serve as an argument to ease the duty to give reasons; it rather indicates a shortcoming from the past when the improvement factor of visitation was given much more emphasis than the accountability factor. The assessment of the visitation reports by the accreditation organisation is therefore one of the methods to increase the authority that the decisions on accreditation carry.

7. Some other musings

Before concluding my talk, I would like to share some more musings with you, namely the role of the administration of courses and institutions in the quality assurance process, the facilities required to provide proper teaching and the comparisons between and comparability of courses that are required to increase mobility.

First of all the administration. Although I would have liked to conclude that the quality and the role of the administration in quality assurance are unimportant, I can't. Rather the opposite, I am now inclined to think. Too often have we noticed how restraining but also how stimulating the role of the administration can be. Misplaced arrogance has often been contrasted by sincere enthusiasm, indifference by a well developed awareness of quality. Although I am quite aware that research, services to society, competition and rivalry as

well as everyday concerns compete for attention and financial input, I dare to say that for most of our institutions of higher education the quality of their teaching will be the decisive factor for their ranking in the European knowledge society. For this reason, encouragement, attention and involvement are vital, not just from the point of view of control, but also in the interest of good education for our countries.

And now the facilities. Yes, there is inequality within Europe; and no, the facilities are not the same everywhere. This is true, but it is not a determining factor for the intrinsic quality of the teaching. An adequate provision of space, libraries, and the information and communication infrastructure are of course important factors that support the quality of the teaching, but they are rarely decisive factors. The ambitions of those who create and provide courses must be realistic in the given context; the assessment must be concerned with how realistic the ambitions are!

Finally, I would like to discuss the issue of comparisons and comparability. Many people doubt or even deny the possibility of comparisons between and comparability of institutions and course programmes. There seems to be a certain logic to this point of view, but the examples used by the criticasters also show how preposterous their proposition is: "how can you compare Oxford and Cambridge with a university in Romania?" Now that would indeed be a nonsensical question, but it would not be if the question was phrased like this: "Which institution or which degree course does the institution or degree course that is to be assessed want to compare itself to and why?". Then the question suddenly does make sense

and the assessed are asked to define their own benchmark. In practice we can see something like this happening already: a number of "leagues" have been formed in which like-minded people discuss ongoing developments and make agreements on them with each other. Whether it concerns excellent research universities, entrepreneurial universities, educational innovators or regional institutions, diversification between the institutions of higher education is inevitable as well as something to be applauded!

8. The Grail

Nobody, except true conmen, consciously develops bad degree programmes. Certainly if higher education is largely funded by the government, it at least attempts to provide acceptable courses. This is to a certain extent different for commercial education. It may be true on paper that the discipline of the market is its executioner, but over the past months I have been most surprised about the ease with which in the commercial sector courses are developed and presented for accreditation. Just perceive a niche in the market, get a couple of modules from the shelf, attach the label "MBA" or a combination of management, communication and international to it, and submit it for recognition. This of course does not work and will in for instance the Netherlands lead to a drastic "shake-out" among private, commercial course providers.

On the whole, however, courses are in fact up to standard and I assume that our observations in the Netherlands and Flanders are shared by our colleagues in Europe. This also means that the most effective instrument of assessors and accreditors is not the iron rod but the velvet glove. What

matters is in fact that quality awareness is raised, that proper advice is given that may lead to quality improvement and that suggestions are made to study good or even best practices elsewhere. At the same time it is also about preventing uniformisation and the reduction of courses to a common denominator. Not only are differences in quality allowed, differentiation and the development of distinctive profiles should also be encouraged. More-of-the-same would be of no avail to our own national students, and definitely not to the "European" student, as differentiation and distinctive profiles are to their advantage. It should therefore be part of our task to provide clarity to the students about where to go for certain specialisations, a particular didactic method, certain profiles and where they can obtain the necessary information to make the right choice of (higher) degree.

This policy of stimulation should also be adopted by those who are in the position to impose consequences as a result of decisions on accreditation. It may seem really firm to have a negative decision on accreditation be followed by for instance termination of government funding, student grants for the course or the right to award titles that are recognised by the government. Yet here too, the question is whether the loss of knowledge and effort in society would not be greater than the short-term gain of firmness. One could also think of a number of examples of sectors in which such government policies have been counterproductive. Think for instance of the sectors of teacher training and health care: virtually all our societies struggle with serious shortages in these areas. For this reason I not only argue in favour of a velvet glove policy among assessors, but also of an even wiser course of action from the responsible politicians and administrators.

9. Conclusion

I must conclude. I have tried to make a tour d'horizon with you along the conditions, modalities of execution and consequences of accreditation in higher education. In the process I mainly emphasised the link between accreditation and quality assurance. Accreditation is impossible without quality assurance and quality assessment. For this reason accreditation procedures and decisions on accreditation must be based on the teaching quality assurance that is vital in our sector. This also applies to those who have to take measures as a consequence of decisions on awarding accreditation. Those measures, too, should aim at stimulating quality assurance.

This is not about occasional stimuli. In fact, the aim of all who are working in the higher education sector and those who carry administrative responsibility in the sector should be that quality awareness must be disseminated widely and that a culture of quality must be created that is based on the repeated question: "Do I fulfil my promises and how do I prove this to myself (and others)?". Once this has become the common attitude, quality assurance will have become part of the genetic make-up of our courses, institutions, lecturers and administrators. Then we can be certain that there will be only winners in the end: the students, the labour market, and society as a whole.

The antithesis between quality assurance and accreditation is therefore a false one. Both systems can only serve to work towards quality improvement!

Ik hope that my contribution has been able to convince you.

Thank you for your attention.