

External Quality Assurance in the EHEA: Quo Vadis?

Reflections on functions, legitimacy and limitations

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Maintaining the quality of European higher education at a high level and raising it even further has been one of the major goals of the Bologna Process.

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Abstract

The paper takes a broad view of the present status of QA in Europe, as most of the structural goals of the Bologna process have been achieved and new challenges are mounted by the BFUG. It mainly addresses the question of how external QA can contribute to quality enhancement, beyond the obvious improvements and correction of weaknesses that follow from the control function. Discussing this topic, the issues of internationalisation, diversity and cost – all of them concerns of the BFUG – are also commented on.

The paper examines methodological characteristics and constraining circumstances concerning external QA and how these impose certain limitations on what external QA can actually achieve. The basic argument is that external QA is now heavily based on mechanisms that are methodologically single-purpose oriented but made to answer complex purposes in national ‘systems’. In order to make further progress in the direction of enhancement orientation, systematic controls must be ‘economical’, so as to give room for more genuinely enhancement-purpose processes, of which some examples are sketched.

Introduction

By 2010 the Bologna process will have reached a new stage, with many of the structural goals fully or partly achieved. In the field of quality assurance, the *European Standards and Guidelines* (ESG) and the *European Quality Assurance Register* (EQAR) are two milestones.

The *Bologna Follow-Up Group* (BFUG) is given a main role in monitoring the reform process and its effects. While expressing its general satisfaction with the effects of the ESG and the maturing practice of quality assurance agencies, the BFUG now recognises ‘new and developing areas affecting quality assurance in the EHEA’¹:

- How to balance accountability and improvement
- How to balance the shared responsibilities of HEIs, QA agencies and policy-makers
- How to handle the increasing diversity across higher education (diversity of pedagogies, institutions, subject areas, students, expectations, missions, etc.)
- How to react to the growing internationalisation of higher education
- How to prevent the bureaucracy and cost of quality assurance from growing

The BFUG goes on to remind us that ‘what always need to be borne in mind is that quality assurance mechanisms are not an end in themselves and that their ultimate goal is to enhance the quality of teaching and research.’

¹ *BOLOGNA beyond 2010* (BFUG, 2009)

With the structural framework more or less in place now, it may be time to take a more inward look at our practice again, discussing the fitness of our mechanisms in relation to this variety of purposes. How should external quality assurance now proceed to fulfil these expectations? The short answer is, I think: by doing several things; by *not* burdening a single mechanism with all these tasks and challenges.

External Quality Assurance: Aims and expectations

The instruments of external quality assurance of higher education have almost exclusively been *evaluations* of some kind or other, using ‘expert’ panels. Let us therefore start by taking a look at some of the different aims and purposes that such evaluations can have. To mention the most obvious:

1. to check that educational quality and quality management comply with set standards
2. to provide transparency through public exposure, thus indirectly moving institutions to improve, in case ‘all is not well’
3. to contribute towards improvements by engaging in an informed dialogue with the institutions, offering recommendations and (hopefully) kindling inspiration
4. to pronounce judgements on how good or weak this or that institution or programme is in relation to other institutions and programmes.

Indeed, other and more detailed aims could be mentioned. But more interesting, perhaps, is the fact that these aims, different as they are, often appear in combinations. Typically, QA agencies rely heavily on one ‘basic’ mechanism and the danger is then that the operation gets a double, or blurred, focus, or that a method that is designed specifically with one purpose in mind tries to do other things – and does it less well. Here I am tempted to quote the former President of ENQA, Peter Williams. In his introductory speech to a quality assurance conference hosted in Vienna by AQA in 2008 he stated:

The first thing, I think, is that we ought to be very clear about what external quality assurance is trying to achieve. And that is not quite as obvious as it sounds, because very often I talk to people about quality assurance and they can’t tell me what the purpose is, they tell me about how they are doing it, but they can’t tell me why they are doing it.²

Obviously, external QA will always be doing more than one single thing, and so must single mechanisms. But if too many diverse purposes are put into one specific type of operation, evaluations may have to carry a load of expectations that are impossible to fulfil.

Control vs. enhancement: the never-ending dilemma

Purposes 1, 2 and 3 above take us right into the never-ending question of control versus enhancement orientation. Of course, this dichotomy poses a dilemma to which no definitive answer can be found. Solutions will always have to be chosen critically in the light of contextual needs and the service of higher goals. But what are the general tendencies? Isn’t there a discrepancy to be observed between the rhetoric and the actual practice? In a plenary session at the 2nd EQAF in Rome two years ago, Francois le Poutier painted a picture of ‘maturing’ external quality assurance in Europe: moving *away from* control and ‘reductionism’ and in the direction of complexity and enhancement:

From	Towards
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² AQA: *Trends der Qualitätssicherung und Qualitätsmanagement im Hochschulwesen*, (Vienna, 2008)

Quality is absolute	Quality is relative
One quality feature dominates	Many aspects are considered
Product is central	Service is vital
End product is inspected	Attempts to optimise process
Fixed standard	Changing standards

But how true is this? Whereas a dynamic and developmental approach is almost unanimously promoted as ‘politically correct’, more hard-line control practices are indeed stubbornly resistant, and in many countries even on the rise, usually in the form of accreditation schemes.

In most Central and Eastern European countries accreditation-based systems dominate. But an even more interesting feature is the tendency for many countries in Western Europe to move in the same direction, where formerly – and ideologically – there has always been a tradition for trust and enhancement orientation. Two cases in point are Denmark and Sweden.

Admittedly, in Germany, the Netherlands and Flanders comprehensive systems of programme accreditation have quite recently been replaced by simpler schemes, but mainly for reasons of cost and burden, while still remaining solidly accreditation-based. Accreditation or accreditation-like methods also play a part in the external assessment regimes in Norway, Spain, Austria, France, Switzerland, Italy and Finland³.

The other main tendency has been for several countries to adopt an institutional audit method. This is now the core method in e.g. Great Britain, Norway, Finland and Switzerland. In other countries it co-exists with accreditation in hybrid models (e.g. Spain, Austria, Germany, the Netherlands and Flanders). In the control-versus-enhancement discussion the audit method has been profiled as a more enhancement-oriented approach, but even audit is essentially a *control* method, although it controls at an institutional level and is therefore less intrusive and burdensome.

Control, enhancement and multi-purpose mechanisms

Accreditation

Since accreditation is now perhaps the most widely used instrument of external quality assurance in the EHEA, it be useful to take a closer look at what it actually is. It then turns out that it is presently more a name than a method. It takes on so many different forms that it is difficult to discuss accreditation from a methodological angle: there simply isn’t any body of methodology specific to accreditation.

Still, the most *specific* feature of accreditation⁴, as compared with other forms of external QA, is the yes/no decision in relation to a defined threshold level – and the serious consequences that a ‘no’ will have. This is in effect the *recognition* function. When accreditation moves beyond this core function to become *the national QA approach* purposes tend to get blurred. The separate functions of ‘recognition’ and ‘evaluation’ are rolled into one procedure; a narrow function mixed with a much wider one. The narrow function (recognition), the one with *consequences*, is most likely to influence the broader process, moving the focus towards control. Of course, in most accreditation schemes the standards are formulated so as to reflect a ‘complex’ concept of quality, and usually there will be valuable observations and recommendations from the evaluating panel, but I would argue that the danger of reductionism is great. Concern with yes/no also entails a particular concern with consistency

³ Sources: Several, including *Accreditation: in International Perspective* (The Inspectorate of Education in the Netherlands, 2006) and *Quality Procedures in the European Higher Education Area and Beyond* (ENQA, 2008).

⁴ I am speaking here of the national, or ‘official recognition’ type of accreditation.

and fairness, which in turn means that one needs clear and unambiguous assessments. This gives priority to a bundle of key measurable ‘facts’. Accreditation – as an evaluation type – is therefore not ideally ‘positioned’ when it comes to actually evaluating in depth in order to assist the institution, or a specific programme, to enhance the overall educational quality.

Accreditation, understood as a formal system of official recognition, carried out on strictly academic grounds by an independent and authoritative agency, is a very sensible idea. As higher education increases in volume and becomes more of a market-related business there is probably a growing need to protect degrees (and students) from inadequate provision and ‘rogue providers’. But must one therefore burden institutions repeatedly with full-scale evaluations in order to perform this task? Accreditation could be streamlined to a format that is fit for its core purpose of providing quality control *at a reasonable level*.

Quality audit

Like accreditation, quality audit is a method with a very specific purpose and orientation. Quality audit is a system-oriented approach that directs itself towards the institution’s internal quality management. As such, it is a ‘meta’ approach in relation to educational quality, always one move away from the actual educational practice. The method’s influence on quality is therefore also indirect: it relies on its ability to see how the institution’s internal quality assurance system secures and promotes educational quality and improvement, perhaps with a few deep dives down into programme practice to see some examples. It is a very useful method indeed, and one that allocates responsibility for quality assurance where it first and foremost belongs: with the autonomous institution itself. Having said that, it naturally follows that this is so precisely because it is only the institution itself that really *can* develop its own quality. The external accreditation or audit, as basically single-purpose mechanisms, can make a contribution through a limited repertory of stimuli – some of them punitive, others encouraging, but their influence as quality enhancers should not be exaggerated.

If we have to accept that the main purpose of external quality assurance is – and should be – one of control, how can we orient our external QA regimes in order to increase their contribution to enhancement and development at the same time? This is no easy task, as I think this can only happen when evaluators get sufficiently close to the actual teaching and learning process, and when they approach their object as ‘critical friends’ in an open and trusting discourse, without a control purpose at the back of their heads, addressing the provider’s learning-directed *performance* and the many interrelated aspects of educational quality that come into play. It demands a process that would sit uncomfortably with a control purpose.

The question of legitimacy and acceptance

For all their ubiquitous presence now in the form of national systems, the status of HE evaluations is still precarious. When it comes to legitimacy and acceptance, it is quite interesting to observe the way in which attitudes to evaluation outcomes seem to be divided along predictable lines, determined by position and ideology. To oversimplify somewhat, many politicians, external stakeholders, students – and the press, who ‘need’ the evaluations to underpin their policies and agendas, tend to express their trust in evaluation outcomes as valid and useful information. Conclusions are taken at face value: as evidence-based assessments that can be used as a legitimate foundation for refusals, demands, ‘repairs’, improvement measures – or even wholesale reforms and regulations. On the other hand, there is usually an opposing side, often the research-trained academics, the ones who typically find themselves at the sharp end of policies and reforms, who will raise doubts about the

knowledge that evaluations produce. They will question the ‘evidence’ as well as the methodology that produces it. Seen from this point of view, there is something amateurish about most evaluations, both in terms of how themes are not sharply enough defined, how the body of empirical data is random and incomplete, and how the process is insufficient in terms of validation and analysis of the data. Squeezed between these two positions we often find the institutional leadership, depending of course on which way the evaluation goes. Their gut feeling may be one of ‘academic scepticism’, but as responsible leaders they must honour the process and they can take support from its outcomes in their own internal steering.

‘Quality in a deeper sense’: limitations and realistic aims

This sceptical outlook does not explain what evaluations actually do well and why they are useful. So that must be added to balance the picture. But in order to build a strong foundation for external evaluations, it is extremely important to be aware of their limitations. Like the famous philosopher, we must clear the ground of uncertainties in order to build our house on solid ground.

The various arguments ‘against’ evaluations and the legitimacy of their results are well known and can therefore be dealt with rather briefly. They were all heavily discussed in what now seems like the early days of external quality assurance (less than ten years ago!), but the fact that they are less prominent in today’s discussions does not mean that they are outdated. Perhaps there is a particular need today – in this age of convergence, legalism, quality indexes and system building – to remind ourselves again of these arguments, ‘lest we forget’. So here is a quick reminder:

- Even institutions have identities and ‘egos’! And they have much to defend: first of all their resources and reputations. Consequently, ‘authoritative’ evaluations that carry with them the danger of tangible consequences will be met with defence strategies. Hence we have evaluation games with less reliable outcomes.
- Higher education institutions and programmes are complex entities and evaluations are supposed to take into account all processes and structures that have an influence on quality – across the institution. To speak nothing of what may affect learning outcomes. Evaluators only get to see a small fraction of the numerous processes and components that make up an institution’s educational practice – and quality.
- Then there is the question of reference. With an indefinite number of ‘aspects’ included in any ‘quality concept’ and a variety of legitimate ‘quality aims’ (Many textbooks operate with 5), most of them formulated in not too precise prose terms, how ‘operational’ are these? We all know that arriving at authoritative, comparable verdicts on ‘quality in depth’ is a very difficult task indeed.
- Evaluations use *peer review*, a practice that has not changed significantly since the early days of quality assurance. Panels of ‘peers’, new ones from one case to the next, who do this on top of their ordinary busy jobs, pronounce their assessments, conclusions and recommendations on these complex matters, often with limited specific training for the task. Do not forget either that these conclusions will frequently come about as the result of discussions where individual peers ‘defend’ diverging views. Evaluation outcomes are typically *negotiated statements* rather than objective ‘truths’.
- Finally, there are the circumstances of the exercise. An abundance of relevant information is normally collected, but the information, such as it is, must be systematised, analysed and weighed under the pressure of limited time. Researchers

may well maintain that the methodological processing of the collected material often leaves much to be wanted.

‘The whole truth’?

Because of their epistemological limitations, external peer reviews with ‘broad’ targets, i.e. the ‘total’ quality of institutions, discipline communities or programmes, must be executed with appropriate caution and reserve when it comes to pronouncing definite conclusions. This is all the more important when the review is mandatory, and as such represents a use of power by society, power to inflict consequences on the evaluated institution. The panels’ verdicts easily become ‘authoritative’ in the sense of ‘official truth’.

On this background, the most obviously overambitious task for external evaluation regimes to undertake is to try to make comprehensive ‘measurements’ of institutional or programme quality in such a way that individual ‘scores’ can be read and compared directly. When attempting to do this, external quality assurance functions as a user’s guide in a HE market that is supposed to cover a wide scale of quality variations. This is of course ‘ranking’ and needless to say it makes very ambitious knowledge claims. Is that the reason why panel members have now changed from being ‘peers’ to being ‘experts’? Of course, external quality assurance can never tell *exactly* how good an institution or a programme is. Such a procedure implies by necessity a reductionist use of indicators and other information, it belies the circumstantial limitations and it disregards the many options that exist in the interpretation of quality and the choice of aims. It was therefore a surprise to find an official statement recently issued by ECA that points in this direction:

Data collection and development of performance indicators should strictly adhere to the principles of transparency, readability and accountability of European higher education, thus allowing for measuring and comparing the strengths of institutions Measuring the strengths of diverse institutions across borders will pose an entirely new challenge. To this end compatible instruments for both external institutional assessments and internal quality assurance systems will have to be developed.⁵

Should, and could, external quality assurance have this task? Is it comparison and competition in relation to a universal benchmark, with external QA as an impartial and omniscient judge, that will improve and develop European higher education to higher quality levels?

The use of external quality assurance

After this exercise in limitation and denial, what remains as useful functions for external QA? Quite a lot, actually. External QA has an essential contribution to make, provided that it does what it does best. I will sum this up in four points:

a) The obvious

1) External QA may accredit – or recognise – higher education institutions or provision as meeting the basic criteria for being, or delivering, just that: higher education of satisfactory quality. This alone is an extremely important function and probably the main reason why external quality assurance regimes were set up in the first place. On this function also rests the cross-border mobility of qualifications in the EHEA.

2) External QA may oversee the internal QA of HEIs. The EHEA consists of autonomous institutions that are themselves responsible for the quality of their provision and who must have internal mechanisms in place in order to honour this responsibility. External QA should

⁵ ECA (European Consortium for Accreditation): *Position Paper on the BFUG ‘Bologna Beyond 2010’ Report*

represent ‘the public eye’ into these matters. By offering expertise in quality assurance – and not educational quality – external QA may bring professionalism and added value to the total chain of quality work.

3) External quality assurance may undertake ‘broad quality’ evaluations of institutions and provision with a development and improvement perspective, although in general this is actually the institutions’ own task. If no objective standard is invoked and no exact measurement against a universal benchmark is attempted, such an evaluation may take its point of departure in the institution’s own perception of its situation and evolve as a discussion between the panel and the institution inside a SWOT-like framework. This is peer review in its proper sense, and conducive to actually achieving improvement.

b) – and beyond...

4) The argument so far has tried to show that adherence to the principle of fitness for purpose will not be reconcilable with achieving all ends with one methodology. Hence, specific methodologies are needed in order to make substantial advances along the road towards increased enhancement effects. External valuation (I hesitate at this point to call it quality *assurance!*) must widen its scope in order to reach such goals.

Through the last decade’s quality assurance ‘wave’ attention has been concentrated on national systems, mainly one-mechanism regimes. Debate has raged about whether accreditation or audit is the best way forward, with the result that some nations have created hybrid systems that combine the two. In my view, however, further progress towards enhancement orientation can only be made if we base our evaluation procedures on a more critical analysis of fitness for purpose. External evaluations (or some of them) must become more focused and ‘narrow’ in the sense that they scrutinise more specific objects, with methodologies that are more specifically tailor-made for the purpose at hand. For instance, there should be more evaluations that look at specific quality ‘aspects’ or processes (e.g. ‘programme coherence’, or ‘internationalisation’, or ‘quality of teaching’, etc.) across a number of institutions and disciplines, identifying different approaches and practices and discussing useful aims and ways to improve. Another idea would be to examine – again across institutions and disciplines – the relationships between learning aims, teaching and learning processes, student assessment and actual learning outcomes, with a view of either fine-tuning learning aims, optimising learning processes or improving student assessment. A third approach might be to evaluate a specific type of programme nation-wide, not in order to benchmark or establish a ranking list of programmes, but rather to get a view of the national ‘state of affairs’, to sample good and less good practices, make international comparisons and discuss general improvements from that platform.

And indeed: why not carry out more of these types of evaluations *across* national boundaries in order to improve the prioritised aspect of internationalisation and to discuss quality phenomena in a truly EHEA context. A next step now, as national systems are more or less in place, might be for national agencies, given the necessary resources, to cooperate more than they currently do in transnational evaluation projects. Such projects would be truly enhancement-oriented, as they cannot – and should not – cover and ‘monitor’ whole national or European sectors; rather, they would inspire participating institutions to fresh thinking through the description, comparison and discussion of different practices in heterogeneous educational systems. Further added value would follow from the effective dissemination of findings and analyses to the wider HE community.

Conclusion

For a start, one needs to be aware that there are limitations to what contributions to enhancement that external quality assurance can bring, beyond what is achieved through control measures. Often the general rhetoric overplays the capacities here. Unless very heavy systems indeed are put in place, and the BFUG warns explicitly against that, the contribution of external QA must be secondary and supportive, while the basic drive towards better quality must come from the institutions themselves. From their quality systems and their quality culture.

In order to make further contributions to enhancement, beyond the kind of systematic assurance that has now been built up, QA agencies must conduct evaluations that are more varied and specific, often drawing on the collective experience and competences of the entire EHEA. We need evaluations with a more demanding interrelationship between purpose and methodologies, and evaluations that come closer to actual educational quality and show a variety of practices. Unless we fossilize in our national systems, there is much interesting and meaningful work ahead. However, as resources are not endless, it probably means that some of the available resources will have to be re-allocated *from* control systems and *to* evaluations with a defined developmental purpose. In turn, that would require smart and less resource-demanding methods for quality control. By the way, ‘trust’ is a highly rated concept in the quality discussion.

Governments, other stakeholders and the general public have a natural wish to know as much as possible about the state of affairs in higher education and they all look to external QA to provide the answers to their questions. Naturally, they want these answers to be as extensive, clear and unequivocal as possible, to serve as foundation for their choices or interventions. Therefore, governments provide the legal framework and often even prescribe the method as well. But it is always easy to blame the politicians. What about the agencies themselves? Can they too act as drivers for more controls and increased knowledge claims on behalf of their operations? Is there perhaps an alluring ‘something’ about the control function and the authoritative statements that is both more convenient and more self-affirming than acting as facilitators for constructive dialogue and sound advice? Agencies cannot deliver any kind of answers and they must themselves, as professional agents, define the premises and limitations of their activities. If they take on functions and powers that go beyond the information value of their products we shall have to add a fifth function to our list: the function of providing a *legitimising, symbolic mechanism of convenience* for providing just those answers that ‘society’ is crying for. A function we should *not* embrace!