

External audits as ‘special events’ in internal quality assurance processes – or:

Quality Begins at Home¹

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Introduction

It may seem as a direct contradiction of the general theme of this conference to present a paper that deals as much with external as internal quality assurance. However, by discussing the *limitations* of external quality assurance we shall advocate the primacy of internal over external processes and argue that these limitations are related to the knowledge claims that can be legitimately made on behalf of external peers or experts. Further, we shall argue that external quality assurance works best when it relates rather directly to internal quality assurance and does not descend on institutions from Olympian heights as isolated events. Taking seriously the generally accepted notion that ‘responsibility for quality rests with the institution itself’, we would like to see external evaluation procedures that primarily function as ‘special events’ in the institutions’ own continuous work with educational quality.

This point of departure has at least two important implications; First, the limitations of external QA would indicate that a demarcation line runs somewhere between such aspects of quality as lend themselves to legitimate, ‘objective’ and ‘absolute’ judgements from the outside and those areas where quality cannot easily be summed up and assessed in absolute terms. The legitimate authority of external verdicts must therefore be discussed in terms of exactly what kinds of verdicts are attempted. Second, this approach presupposes that robust internal QA mechanisms are really in place. External QA cannot effectively relate to internal processes unless these exist in a developed form, with documentation that is readable to outside observers or investigators.

The views presented in this paper are based on experience gained from three years of quality audits and programme accreditations in higher education institutions, carried out by the Norwegian Agency of Quality Assurance in Education (NOKUT). The agency has not yet conducted a systematic analysis of effects and outcomes and the views presented do not claim to represent the official position of the agency.

Institutions serve, agencies rule?

Mass education, institutional autonomy, the Bologna process and the influence of new management philosophies are usually given as the main reasons why external quality assurance has been strengthened over the last 10 – 15 years. However reasonable this development may have been, it is also somewhat paradoxical that external distrust seems to be increasing with ever higher levels of external control. Is this a self-driven spiral? What’s more, external QA regimes have over the last 5 years drifted in the direction of *accreditation*,

¹ Paper presented at the European Forum for Quality Assurance, Munich, Nov. 2006.

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which sets out to give absolute verdicts with reference to fixed quality standards. This new stress on *external authoritative control* is commonly ascribed to political pressures, but it is only fair to ask if sometimes it may not also be driven by the QA agencies themselves. An operational logic that favours clear answers and no-nonsense decisions may have an appeal for customers and agencies alike.

It is no wonder that institutions and academics have often reacted with protest or by dragging their feet. They have referred to a long-standing culture of self-management, based on the strict demands of science. They may further argue that any concept of quality in education must be extremely complex and that any attempt to measure it through outcomes is a slippery affair: neither the 'product' nor its quality can be defined in precise, measurable terms. It is only fair that the authority of external quality assurance is not allowed to go unchallenged.

After Bergen 2005: A better match between internal and external?

Although it has long been axiomatic that institutions are themselves responsible for educational quality, public expectations as to how this responsibility is to be discharged and documented have so far been rather vague in most countries – or absent altogether. Consequently, external evaluations have had to grapple with the problems of quality directly and in a rather ad hoc way, without systematic reference to the actual intentions, quality monitoring and quality enhancement work of the institution. This practice, as we see it, overestimates the capacity of external experts – at one stroke, as it were – to come up with a profound and valid quality analysis. For its 'evidence base', the method usually depends heavily on a self-evaluation that the institution produces with this special event in mind and this lack of linkage to documentation from everyday internal quality assurance raises the question of 'window dressing' and leaves doubts about the chances of lasting effects.

The recently agreed *Standards and Guidelines for Quality Assurance in the European Higher Education Area* may represent a new and welcome orientation. By defining certain basic principles and a number of standards for internal quality assurance, it takes the principle of institutional responsibility seriously and begins to provide external QA with a reasonable frame of reference. As institutions introduce quality assurance procedures in compliance with the standards a more reliable body of documentation will also be at hand for the external investigations and assessments. This helps tilt the balance between internal and external back to a more sensible position and may present external review with a task that it may legitimately and practically handle. But it is also arguable that these European standards are rather too general and 'minimal' to be of great operational use. Consequently, they ought to be beefed up at national level in order to secure a level of internal quality assurance that is really 'responsible'.

Quality audits as the main instrument of external QA: the Norwegian model

Since its formation in 2003, the purpose of the independent Norwegian Agency for Quality Assurance in Education, NOKUT, has been to oversee the quality of Norwegian higher education by means of evaluation, accreditation and approval of quality systems, institutions and programmes. It is mandatory for all institutions to have a quality assurance system that covers all aspects of the educational provision, and students' evaluations of teaching and learning must be part of such a system. Authorised by a Government Regulation, NOKUT has issued 10 criteria of what constitutes a satisfactory quality assurance system. Cyclic auditing of the institutions' quality assurance systems, then, is the core element of the external QA apparatus in Norway.

It is important to observe, though, that the quality audits are supported by other mechanisms. There is also an accreditation scheme that performs initial accreditation of programmes and institutions (no period restrictions) and accreditation revisions. Through revision procedures an institution may lose accreditation for any of its programmes – or lose its institutional accreditation altogether. Revisions are supposed to be triggered by indications, first and foremost detected in the quality audits. There is currently a debate about how ‘heavy-handed’ NOKUT should be in its use of revisions.

The development of the audit model was a long process.³ One challenge was to construct a model containing the necessary control and indication elements while simultaneously avoiding bureaucratic overload and evaluation burden. One way of meeting this challenge was to understand external audits as a special event in the internal quality assurance process. The Norwegian Agency has organised the quality system audits in accordance with this understanding when it comes to the construction of the expert panels, the type of documentation asked for, and the carrying out of the institutional visit. However, this understanding of the processes cannot override the fact that the quality system audits make up one part of a national system of sanctioning and reward. Based as they are on authentic documentation from internal quality assurance, the Norwegian audits are probably the ones in Europe that go furthest in resembling audit processes as we know them from other areas of public and private enterprises (financial audit).

The role of internal QA

It would take too long to discuss in detail here the function and multiple tasks of ‘responsible’ internal quality assurance, so we shall concentrate on a few essentials. To take the European *Standards and Guidelines* as a point of departure, the document says sensible things about *what* aspects of quality must be assured but little about what characterises good quality processes. In Norway these discussions now evolve around the formal demands that have been defined for the institutions’ quality assurance systems, which are mandatory by law since 2003. The question, of course, is not so much whether such systems are formally and legally required or not, but whether internal quality assurance is *systematic*, which in practice may amount to the same thing. But what does it take for internal QA to be systematic and functional?

The most obvious use of internal quality assurance is to function as a tool of quality *steering*. If institutions are to be truly responsible – not to mention if they want to improve and excel – people in steering or managing positions must be able to take the right decisions in areas that affect educational quality. In order to do this on an informed basis, they must first be able to analyse – or have analysed for them - the state of quality variations around the institution. Areas of weak quality must be found and measures chosen. An institution where this is the situation can fill the function of ‘academic leadership’ with an added meaning, beyond the mixture of strategic politicking and administrative chores that is so often the case.

But analysis and well-aimed measures do not materialise out of thin air. The other obvious thing about systematic quality assurance is that it works as an *information system*. What is required is that data about quality is extracted and processed at the level of delivery (where quality actually ‘exists’ and where basic information must be generated) and transported to bodies and persons whose responsibility it is to monitor and react to this information. The information must be presented in formats that are readable, manageable in volume and

³ The forerunner of NOKUT, the Network Norway Council, started the development of this system in 1998 and carried out a pilot project in four institutions in 2000 – 2001.

compatible with the level and function of responsibility. Often this implies a series of intermediate steps (e.g. programme, department, faculty) where information will be aggregated, sifted and distilled before it reaches the top level.

This is no easy task. So far in the cycle of Norwegian quality audits we often find that institutions have managed to build rather impressive QA system structures and that they are also strong on aims, ideals and general discussions relating to quality. But we also find that these discussions – and the decisions they result in - are rather weakly founded in actual information about quality at the level of delivery. Typically, one of two things (or a combination) will then be the cause: Either the system is an empty structure, with not much happening in it, or (which is the real challenge) the institution has not managed to handle the information in a way that produces sufficient analysis and remedial or developmental action. If we imagine that a lot of information is assembled annually at course or programme level, consisting i. a. of quantitative data on intake, input and outcomes, students' course evaluations, relevance studies (occasionally) and the teachers' own assessment and analysis, it goes without saying that many bureaucratic dangers are lurking in the wings. This requires a conscious distinction between information that is *registered and stored* for documentation at 'ground level' and acted upon locally and, on the other hand, the distilled essentials of this information that are *reported* along the prescribed channels for discussions and decisions higher up in the steering hierarchy.

A third point about internal quality assurance is the necessity of *wide ownership and participation*. This should be seen in relation to the previous point. Systematic quality assurance not only runs the hazard of degenerating into empty bureaucratic routines ('feeding the beast'). It may also all too easily become the exclusive property of management and administration ('the beast'!), thus reinforcing the dragging of feet among rank and file faculty. A system like this will hardly work if course teachers cannot be persuaded to take ownership in it. That, in turn, requires that real functions and real powers are delegated locally. Only by attaching a lot of significance to quality work at ground level, where teachers and students interact, is there a chance of creating that 'culture of quality' of broad participation that the European *Standards and Guidelines* are calling for. It also helps securing that internal quality work remains focussed on actual teaching and learning performance. So actually, we are talking here not only of finding a good balance between internal and external QA, but equally much about internal QA finding a good balance between levels in the institution.

The external experts: insiders as outsiders?

External quality assessment takes different forms, but experts play a crucial role. In the Norwegian audit system, the task of the expert panels is to assess the institutions' quality assurance systems in accordance with given criteria. The expert panels have, through their report, to give the Board of NOKUT advice on whether or not an institution's internal quality assurance system should be found satisfactory.

For the audits, NOKUT has a pool of experts, i.e. a group of experts that ideally function for a number of years. 3 to 5 persons from this pool make up an expert panel. NOKUT has defined what competencies each expert panel should consist of: at least one professor, at least one person with experience from high level academic leadership, at least one person with expert knowledge in the field of quality assurance or evaluation, at least one member from abroad (usually an academic who speaks a Scandinavian language) and one student with experience from governing bodies at an institution and/or other relevant experience from student organisations. The students are nominated by the national student unions, the other experts are

suggested by NOKUT's staff on the basis of prior knowledge, public information and informal references.

In the Norwegian context, the expert panels for audits do not so much resemble an academic peer review as the juridical peer system. Expert panels may not be a good term in English, as the members of the panels in one way are as much 'laypersons' as experts. One can say that the panels to a certain extent make up a microcosm of the higher educational institutions. The expert panels are outsiders to the institutions they audit. However, most of the experts are insiders in relation to the field of higher education, and usually connected to another institution of higher education. With the exception of one of the competencies (evaluation method or quality assurance), it is precisely the insider experience that qualifies the persons for the panels. They know the everyday life of higher education institutions, they have experience as to what sort of matters tend to be problematic, and they do not have unrealistic expectations about quality assurance systems.

The legitimacy of the national quality assurance regime rests heavily on the work of the experts. So far, there have been some discussions e.g. about experts overstepping their roles, but on the whole the expert panels in the audits seem to function very well. However, we will not delve further into a discussion of the actual work of the expert panels. One important concern in a relatively small sector of higher education, like the Norwegian one, is to avoid too close ties between the members of the panels and the institutions. The external experts are often specific others in the sense that many persons know each other. It is hardly possible to set up expert panels with persons that have no relations whatsoever with the staff at the audited institution. For each audit, the institution is asked if it has comments on the composition of the panel. The institution can give an opinion on the composition, but cannot refuse to accept the panel. There have been several comments from the institutions on the panels, but very few of those are related to a named person. Rather, the institutions have been concerned if the panel as a group have experience from the relevant institutional level, the relevant educational fields etc.

The model of the expert panel was constructed with a concern for taking care of the external/internal dynamic in mind; hence the panel as a modified 'micro-universe' of the institution, representing a sort of jury of one's peers. Seeing that the pool arrangement makes many experts take part in quite a few audits and evaluations, professor Berit Askling has put the following question on the agenda: Are some experts in the process of constituting a new 'profession' – a new 'evaluation priesthood'?⁴ Is it so that the panels and the leadership of the institutions develop a common set of modes of thoughts, concepts and terms, different from those one commonly finds in the institutions? If this is the case, then the idea of a jury of one's peers for the institution as a whole can be undermined.

On the other hand, leaning too heavily on the insider-position may also have its problematic sides. It might give a weight to a more conservative side of the institutions. Stensaker⁵ has

⁴ See e.g. paper presented to the 28th Annual EAIR Forum, *Quality Tellers: The Status of Knowledge Produced by Expert Panels Assessing Educational Quality.

⁵ As a part of the evaluation of the Norwegian Quality Reform, NIFU STEP-researcher Bjørn Stensaker has evaluated the implementation of quality assurance systems in higher education. Relevant reports and papers (in Norwegian):

Stensaker, B. (2006a), Kvalitet som forhandling – Institusjonell autonomi og statlig styring anno 2006. Paper presentert på NOKUT konferansen 3.-4. mai 2006, Trondheim, URL

<http://www.nokut.no/graphics/NOKUT/Artikkelbibliotek/Generell/NOKUT%20konferansen%2006/Stensaker.pdf>

sketched four possible implementation processes for an internal quality assurance system: the implementation ends in technical/legal activity, as imitation, as tradition and as innovation. Too much stress on an insider-position might, and we say only might, undermine the innovative elements in the development of systems.

‘A good process’ – comments from the audited institutions

In the Norwegian audits, the first phase of the evaluation process consists of a document study. The institution provides documentation of their quality work. In line with the ideal of the external being a special event of the internal, documentation prepared especially for the audits is not required. Some institutions may prefer to produce such documentation, but it is not a part of the system. However, one of NOKUT’s evaluation criteria specifically asks for an annual report of the institution’s quality work, and this (or *these*, as an evaluation cycle covers several years) generally ‘counts’ as a self-evaluation report. So one may say that there is a certain formative influence as to what sort of documentation the system should produce for internal use. But this again is exactly the point of the audit: to assess how an institution assembles, orders, analyses, presents and (itself!) makes use of quality information.

The officer of the agency prepares the programme for the site visit in cooperation with the expert panel and the institution. According to their mandate, the panel always meets with leadership, academic staff, administrative staff and students. In addition, the panel can speak to anyone and visit whatever part of the institution it would like. The institution gets a draft of the audit report for commenting on mistakes and misunderstandings. It is up to the expert panel to decide how such comments will influence the final report.

By September 2006, 32 institutions have had their quality assurance system approved of by the Board of NOKUT.⁶ When an evaluation report is presented to the Board of NOKUT, the institution’s own comments on the report are also part of the formal basis for the Board’s decision. Both the report and the comments are public documents and published on NOKUT’s website.⁷ 16 out of the 32 institutions have offered positive and explicit comments relating to what the external audit meant to the development of their internal system and quality work.

The comments from the institutions must be understood on the backdrop of more factors. Having a mandatory internal quality assurance system is relatively recent (from 2004) and NOKUT is performing the first cycle of auditing these systems in 2004-2007. Many of the systems that have been audited are still developing and most probably the evaluation procedures have contributed to the institutions’ quality work. One can easily imagine that the leadership of the institution, who in most cases write the comments, will be quite satisfied with an expert panel that recommends their system for approval, and will be rather generous in issuing positive comments. It is also relevant to make another point here about the Norwegian situation: it is probably fair to say that the relationship between the sector and the

Stensaker, B. (2006b), *Institusjonelle systemer i høyere utdanning – vil de bidra til bedre kvalitet?* Evaluering av Kvalitetsreformen, Delrapport 3, Norges forskningsråd – Røkkansenteret – NIUFSTEP, 2006. URL http://www.nifustep.no/norsk/publikasjoner/delrapport_2_2006_institusjonelle_kvalitetssystemer_i_hoeyere_uttanning_vil_de_bidra_til_bedre_kvalitet

Stensaker, B. (2006c), *Institusjonelle kvalitetssystemer i høyere utdanning – vil de bidra til bedre kvalitet?* URL <http://www.forskningsradet.no/servlet/Satellite?blobcol=urlvedleggfil&blobheader=application/vnd.ms-powerpoint&blobkey=id&blobtable=Vedlegg&blobwhere=1158652822201&ssbinary=true>

⁶ 4 institutions have failed to have their system approved of after one audit. 3 of these have been audited twice, with satisfactory result the second time, while 1 institution is still to have a second audit.

⁷ <http://www.nokut.no/sw8854.asp>

agency is based on a trust that still seems to hold. Both the criteria for and the content of educational quality can best be understood as negotiated (Stensaker 2006a).

Although the main focus of the audit is system approval or not, it is still relevant, on the background of the referred comments, to ask about the added value of an external audit compared to what comes out of internal processes. The main and obvious point is that an external view is often useful. A qualified and experienced panel are simply able to ask relevant questions and make good comments. This alone may fuel internal processes. The trained gaze from the outside sees other elements, constellations, obstacles etc. than an internal one. The institution is not one solid entity in the sense that it consists of groups/categories that always have harmoniously shared views of important issues in the organisation. An external view may, in some cases, help to shift stalled positions.

To illustrate another point we will draw on our own informal knowledge. One group of interviewed institution representatives were asked what elements of the internal quality system they thought should be strengthened in the future, loosely formulated as ‘what do you want more of?’. ‘This!’ was the answer – an answer the panel did not interpret as more agency interference as such. Rather, what was asked for were overarching discussions, based on the sharing of experience, in a cross-disciplinary collegial setting. The rector of a smaller institution called some time after a site visit and said he felt he had to tell how much creativity relating to quality work that had developed amongst the teaching- and research staff in the wake of the auditing process. In both these cases, the panels through their questions created an atmosphere of qualified discussions amongst the institution’s own staff.

We do not argue that the institutions are now saying unanimously that the external audits have had a positive effect on the development of educational quality. It is too early to state what the implementation of internal quality assurance systems actually means on the bottom line of educational quality. Of course, the internal effects that issue from of an external audit will differ, too. As agency staff we can say in general that the performance of the audit panels play a main role in creating a good process. In this connection, their competence as informed communicators is probably more important than their assumed authority as unflinching judges.

External quality assurance revisited

This takes us back to what external evaluations by peers *can legitimately do*. If standards are unequivocal, and the information clear and adequate, external experts can pass legitimate and fair judgement on issues of recognition. (That clear standards can also be tools for creating undue uniformity, is a different issue and beyond the scope of the present discussion.) Experts can assess if the necessary qualities in terms of institutional responsibilities, infrastructure, internal quality assurance, research activity, staff competencies, curriculum and teaching provision etc. are in place. When moving beyond the question of standard requirements, however, more restraint and modesty is called for. External assessments are still valuable and even necessary but any claim on ‘absolute’ insight and judgement will simply not be consistent with the complexity of the issue, the competence of peers and the body of information that is normally available in such processes. It follows that peer expertise, where it is most needed and valuable, should be probing, tentative, and ‘negotiating’ – even creative! – in its attitude to the evaluated object.

If quality assurance is to work well, then, it will be useful if (a) the tools of internal and external procedures, and (b) the purposes of control and enhancement, are *both* distinctly defined *and* made to interconnect. On the one hand, an accreditation-like procedure,

understood as a formal, national system of *recognition* that is run by an independent and authoritative agency, will serve a useful control purpose. In most countries there is a need to protect degrees (and students) from inadequate provision and ‘rogue providers’. Institutional accreditation, for instance, will secure that only responsible, well-defined and resourceful institutions – private or public, but *proper* institutions – are allowed to offer higher education services.

On the other hand, external quality assurance is also thought of as something more than just ‘assurance’ in the narrow sense of ‘control’. Just as we like to think of ‘quality’ in education as a complex, dynamic and extendable phenomenon, quality assurance should be geared to promote quality development, to help *extend* quality to all relevant aspects and in the direction of excellence. Moving into this terrain, clear answers and absolute judgements are harder to come by. External evaluations must then be characterised more by flexibility, discourse and even ‘negotiation’. So if accreditation is well suited for the *recognition* aspect of quality assurance, it might also be a good idea to confine it to that role, leaving the fuller and cyclical external reviews to an approach that is better suited for broad purposes. This approach should be characterised by a relatively open and holistic attitude, dynamic rather than rigid processes and outcomes that are more tentative and suggestive than absolute. On the other hand, we fear that where recognition/accreditation and broader purposes become ‘muddled’ in the same evaluation procedure, the logic of recognition will prevail and invite reductionism and doubtful authority claims, along with an oppositional atmosphere between reviewers and their object and a defensive attitude on the part of the evaluated party. Chances are that trust, honesty and transparency will then suffer.

Then there is the question of how heavy-handed external review ought to be. Questions of trust/distrust, intrusion and evaluation overload are implied here. How can external review be minimally intrusive, while remaining meaningful in the sense that it promotes quality development and at the same time exercises a ‘reasonable measure of control’? If accreditation/recognition is taken care of through a separate, limited mechanism, a basic system of cyclical evaluations is needed that meets higher education at the institutional level, where responsibility rests. External QA must then be able to discuss strategy and/or quality issues constructively with the institution on a commonly accepted platform of information and – at the same time – it must be robust enough to detect at least indications of weak quality in the portfolio. In a well-developed form, institutional audit may just be the right medium for this.

External QA cannot perform these tasks well unless it communicates with the institution’s own quality work. And not just any kind of quality work. This work must be *systematic, comprehensive, documented and transparent*. An institution’s internal quality assurance must first of all have these qualities for the benefit of the institution’s own quality management. If institutional autonomy and responsibility are to be more than token, symbolic words, the institution itself must know about the quality of its provision, so as to be able to do sensible things to improve it. Quality begins at home. But – fortunately - such internal quality work as will enable institutions to monitor and steer quality effectively will also enable external QA to perform *its* function in a meaningful way.

Knowledge ambitions and a realistic role of external QA

Regimes of external review may have several objectives, among these (a) to act as a whip and a spur to internal quality work, (b) to contribute to quality enhancement by inspiring and assisting the institutions, (c) to simply control quality in relation to standards and (d) to act as

a consumers' guide in a market of good and weak institutions and programmes. Methodologies and costs will vary, depending on how each of these tasks is emphasised. Some of them are harder than others too: Particularly the function of providing reliable market guidance (ranking?), often combined with quality control, may seem like 'mission impossible' and would in any case demand more resources than is normally at hand if it were to be undertaken with any accuracy. Still, isn't this what often seems to be expected of the external quality assurance agencies now? To present 'truth' and demand the correction of shortcomings through authoritative verdicts and follow-up rules. If this discrepancy between ends and means really exists, *one* of the roles of external QA is symbolic: to serve as a legitimising tool of convenience. A more realistic aim is for external QA to exert *control at a reasonable level* (leaving some room for trust), while simultaneously seeking to advise and assist institutions in their efforts to develop the quality of their provision. This, however, would mean that extreme knowledge claims on behalf of external QA must be limited to areas where they are actually sustainable. It may also mean that the usual dichotomy/'tension' between control and enhancement is after all less critical than the one between what external evaluations can and cannot actually deliver.