

External Quality Assurance in the EHEA: Quo Vadis?

Reflections on functions, legitimacy and limitations

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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 Among these:

- 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 prevent the bureaucracy and cost of quality assurance from growing.

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

External Quality Assurance: Purposes and Expectations

The instruments of external quality assurance have almost exclusively been *evaluations* of some kind or other. Let us therefore start by taking a look at some of the different 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 kindling inspiration
4. to pronounce judgements on how good or weak an institution or a programme is in relation to other institutions and programmes.

Indeed, other and more detailed purposes could be mentioned. But more interesting is the fact that these purposes, 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 for one purpose tries to do other things – and does it less well. In an introductory speech to a quality assurance conference in Vienna in 2008 the former President of ENQA, Peter Williams stated:

¹ *BOLOGNA beyond 2010* (BFUG, 2009)

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

Control vs. Enhancement: the Never-ending Dilemma

Purposes 1, 2 and 3 above take us right into the question of control versus enhancement orientation. Where should the emphasis now lie and what are the general tendencies? In a plenary session at the 2nd EQAF in Rome two years ago, Francois le Poulthier 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
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? In my view there is a discrepancy to be observed between the rhetoric and the actual practice. Whereas a dynamic and developmental approach is almost unanimously promoted as 'politically correct', more hard-line control practices are 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 more interesting, perhaps, is the tendency for many countries in Western Europe to move in the same direction, where formerly – and ideologically – there was always 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 have also found their way into the external assessment regimes of 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). 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.

Control, Enhancement and Multi-purpose Mechanisms

Accreditation

Accreditation is now perhaps the most widely used instrument of external quality assurance in the EHEA. However, it takes on so many different forms that it is presently more a name than

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

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).

a method, which makes it difficult to discuss accreditation *practice* from a methodological angle. Still, the most *specific* feature of accreditation⁴ is the yes/no decision in relation to a defined threshold level – and the serious consequences that a ‘no’ will have (the *recognition* function).

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? Could not accreditation be streamlined to a format that is fit for its core purpose of providing quality control *at a reasonable level*?

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, mixing a narrow function with a much wider one. The recognition function, the one with *consequences*, is most likely to influence the broader process, moving the focus towards control. Of course, most accreditations will 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 entails a particular concern with consistency and fairness, which in turn means that one needs clear and unambiguous assessments. This gives priority to a bundle of key standards, preferably supported by performance indicators. 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.

Quality audit

Like accreditation, quality audit is a method with a very specific purpose. Quality audit 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 management system secures and promotes educational quality and improvement. 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. 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.

Maybe we have to accept that the main purpose of external quality assurance is – and should be – one of control. How can we then orient our external QA activities in order to increase their contribution to enhancement at the same time? I think this can best happen when evaluators get sufficiently close to the actual teaching and learning process, approaching their object as ‘critical friends’ in an open and trusting discourse, 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

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

For all their ubiquitous presence now in the form of national systems, the status of HE evaluations is still precarious. 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 and students, who ‘need’ the evaluations to underpin their policies and agendas, tend to express their trust in evaluation outcomes as valid information. Conclusions are taken at face value, to 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 who will doubt the knowledge that evaluations produce. These are the research-trained academics, the ones who typically find themselves at the sharp end of evaluations as well as policies and reforms. Seen from their 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. 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

The various arguments that ‘warn against’ the legitimacy of evaluation results are well known. They were all heavily discussed in what now seems like the early days of external quality assurance (about 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. Evaluations that carry with them the danger of tangible consequences will be met with counter-strategies. Hence we have evaluation games with less reliable outcomes.
- Higher education institutions and even programmes are very complex entities. Evaluators only get to see a small fraction of the numerous processes and components that make up an institution’s educational practice – and quality.
- With an indefinite number of aspects included in any ‘quality concept’ and a variety of legitimate ‘quality aims’, most of them formulated in not too precise prose terms, how can such a complex frame of reference be ‘operationalised’?
- 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 and recommendations on these complex matters, often with limited specific training for the task. Frequently, conclusions 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 who well can this information, such as it is, be systematised, analysed and weighed under the merciless pressure of limited time?

‘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. 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. Needless to say, this makes very ambitious knowledge claims. Such a procedure implies by necessity a reductionist use of indicators and other information, it belies the circumstantial limitations of the exercise and it disregards the many options that exist in the interpretation of quality and the choice of aims. Finally, it will have a tough task 'correcting' for cultural and other contextual factors. 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

How can external QA be impartial and omniscient judge when institutions compete in relation to a universal benchmark – without grossly reducing and simplifying the concept of quality?

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. But it may be a rather simple and specialised process.

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 represent 'the public eye' into these matters. By offering expertise in quality assurance – and not in every aspect of 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. 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.

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

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.

Through the last decade attention has focused 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. But if external QA is going to yield more than control effects its fitness for purpose must be considered more seriously. Evaluations that aim at enhancement 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, one may look at things like ‘programme coherence’, or ‘internationalisation’, or ‘quality of teaching’, 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 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 course design 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 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 take their cooperation beyond ‘mutual recognition’ and into truly transnational evaluation projects. Such projects would be enhancement-oriented, as they would inspire participating institutions to fresh thinking through the description, comparison and discussion of different practices in heterogeneous educational systems. Further added value might follow from the effective dissemination of findings and analyses to the wider HE community.

Conclusion: External QA and Enhancement

One needs to be aware that there are limitations to what contributions to enhancement external quality assurance can bring, beyond what ‘repairs’ are achieved through control measures. The general rhetoric overplays the capacities here. 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 cultures.

In order to make further contributions to enhancement, QA agencies must (also) conduct evaluations that are more specific, with a more demanding interrelationship between purpose and methodologies. 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. For example, would it not suffice to accredit *institutions*, extending trust to programmes delivered by proper – and properly managed – institutions?

Governments and the general public have a right to know something about the quality of higher education. Naturally, they want this information to be as extensive, clear and unequivocal as possible. Therefore, governments tend to 'beef up' their national (external) QA system.. But 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 a *legitimising, symbolic mechanism of convenience* for providing just those answers that 'society' is asking for. A function we should *not* embrace!