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## **Accreditation and Quality Assurance; Accreditation as Quality Assurance – A Skeptical View<sup>1</sup>**

All European countries now have formal mechanisms for the quality assurance of higher education, whereas only some of them have introduced accreditation. Nations usually operate only one official system of external quality assurance, so accreditation – where that is chosen – must then perform everything that is expected of quality assurance. Since ‘quality assurance’<sup>2</sup> is a term that covers much more than ‘accreditation’ (in its simplest definition), there will always be interest in the way that an accreditation regime takes care of *all* aspects of quality assurance. I am thinking here particularly of the developmental aspect, of course.

### **Accreditation as a model for Europe?**

Quality assurance with an emphasis on control mechanisms is the twin sister of deregulation. In today’s world – in Europe certainly no less than elsewhere – deregulation is the name of the game, creating – or upholding - institutions of higher education that are autonomous and self-regulatory, carrying the weight of public accountability on their own shoulders. Accreditation, with its defined standards and threshold levels, and with its ring of product guarantee and quality control, looks like a forceful and efficient mechanism in this context. With accreditation, quality assurance is seen to ‘deliver’ effective customer protection and accreditation is now very much on the rise throughout the Bologna area. The ‘movement’ gets momentum from external forces like political drives on the one hand, and from ‘internal’ forces – from quality assurance itself – on the other. There seems to be an operational logic that favours the no-nonsense and decision-oriented approach that accreditation represents. Accreditation is concerned with *clear answers* and *equity* and this may have its appeal for quality assurance operatives and customers alike. However, in order to become a model for Europe, accreditation still has to win through also in those countries whose legislations do not today include this mechanism. Among these are large nations with long-standing traditions in quality assurance, such as Great Britain and France. Skepticism against accreditation is also deep-seated in the Nordic countries, but even here it is gradually being introduced in partial or ‘light’ versions.

### **Accreditation ‘deconstructed’: Methodological considerations**

Although the term ‘accreditation’ is easily defined in its crudest technicality (the yes/no question), it is presently more a name than a method, or a consolidated practice. First, there is the gap between ‘private’/‘label’ and ‘official’/‘public’ accreditation, that mean very different things; then there are the differences between public regimes that are either

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<sup>2</sup> In spite of the restricted associations that the word ‘assurance’ gives, ‘quality assurance’ is commonly understood to mean both ‘assurance/control’ and ‘enhancement/development’.

mandatory or voluntary, between those that are limited in time and those that are not, and between programme and institutional accreditation. The fact that several nations have now written accreditation into their laws of higher education is – at least in some cases - more a matter of terminology and political symbolism than an option for an alternative approach. This is also why it is difficult to approach accreditation from a methodological angle: there simply isn't any body of methodology specific to accreditation.

The only *specific* feature of accreditation – as compared with other forms of quality assurance - is the yes/no-decision in relation to a set of fixed standards that define a threshold level. Accreditation is thus seen to establish a framework for *accountability*. But this is in effect little else than the 'recognition' function that most nations have always had in various forms, only now moved out of the government offices (or wherever it rested) to become part of the operation of an independent quality assurance agency. As this happens, the accreditation *function* gets identified with an accreditation '*type*' of *quality assurance* that the particular agency operates and this is likely to have methodological and attitudinal consequences. For one thing, the emphasis on control, minimum standards and exact judgements will easily carry a *distrust* towards the evaluated institution or programme – more distrust than is actually warranted in this age of increased transparency and quality assurance?

Another pitfall lies in the possibility of reductionism. Concern with yes/no means concern with equity, which in turn means that one needs clear standards in order to secure consistency in the assessments. And the clearest standards, of course, are those that either force a yes/no answer, or can be measured. So not only will this influence the body of reference against which assessments are to be made, but it is also likely that those standards that can be reduced to numbers will overrule the 'rounder', more qualitative ones. With one-dimensional, unambiguous standards *validity* increases, but possibly at the expense of the *legitimacy* that holistic evaluation by peers is supposed to secure.

It remains to be demonstrated that the assurance that is reaped from accreditation is any more real than what can be gained from other quality assurance regimes that largely employ the same evaluation methods, but with a less aims-directed twist to them. At worst, quality assurance defined as accreditation may become more one-dimensional and mechanistic. Also, evaluative practices that promote genuine improvement – beyond the acceptable minimum – will require a degree of trust and honesty that is hard to create when yes/no decisions with palpable consequences are looming too high on the horizon.

Although accreditation, then, covers many different nuances of actual practice, there are these three points to be made about it in relation to other 'types' of quality assurance: it carries with it a certain attitude to the evaluated object, it involves the danger of reductionism and it adds little value to the two well-established concepts of 'recognition' and 'quality assurance'. The two main objectives of external quality assurance may then perhaps be defined something like this:

- **Recognition:** Issuing an authoritative and (reasonably) trustworthy guarantee that a course/a degree/an institution holds an acceptable educational quality and level.

- **Quality assurance:** Producing information (knowledge<sup>3</sup> or indications) about quality variations (including quality failure) and their reasons, so that measures can be found that will promote continuous and general enhancement.

Interlinked and partly overlapping as these objectives are, they are still functionally different and they call for different approaches. The appealing neatness about accreditation is that it claims to do both at once, but can it do both equally well?

### **Recognition**

Recognition is more a matter of *level* than *quality*. When recognising higher education, we ask questions like: What is this? Is it higher education? (i.e. does it have certain acknowledged characteristics of higher education, e.g. in syllabus and in the teachers' competence?) What volume does it have (ECTS)? What level is it at (Ba/Ma)? Are there overlaps (e.g. from the bachelor qualification into a masters programme) that prevent full recognition? And finally: Is it quality assured in a satisfactory way? When such recognition is transferred from one country to another, the questions are exactly the same, but *trust*, based on established knowledge of the other country's higher education and quality assurance systems, makes it unnecessary to ask all of them in individual cases. These are questions that relate to minimum requirements and standards and only in terms of minimum standards is quality promoted via recognition – as such.

### **Quality assurance beyond recognition: the issue of enhancement**

As noted at the outset, we are used to think of quality assurance as something more than just *assurance* in the narrow sense of 'control', although this is also an important aspect of it. Just as we like to think of 'quality' in education as a complex, dynamic and extendable phenomenon, quality assurance must be geared to promote quality development, to *extend* quality to all relevant aspects and in the direction of excellence. I have tried to argue here that accreditation may have certain limitations in this respect, but this must not be understood as a position 'against accreditation'. The point is that accreditation is well suited for the *recognition* aspect of quality assurance, and that it might therefore be a good idea to 'diminish' it to that role, leaving the fuller external examination to another 'basic' approach. Examples of alternative (and well-established) methods are quality audit and other types of thematic, programme, subject or institutional review. Common to all these are a relatively open and holistic attitude and a reliance on the qualitative assessment made by peers or experts. There will usually be a frame of reference – or even explicit benchmarks – but ideally *the question of accreditation/recognition is not (a dominant) part of the mandate*. The yes/no question of recognition, if it is at all realistic and 'threatening', will tend to steal attention from other aspects of the exercise and to create an oppositional atmosphere between external review and its object and a defensive attitude with the evaluated party. Trust, honesty and transparency then suffer.

### **Accreditation's role in quality assurance**

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<sup>3</sup> The knowledge status of information produced through evaluations is a different – and difficult – issue that will not be commented upon here.

Accreditation, understood as a formal, national system of *recognition* that embraces the entire higher education sector, and carried out on strictly academic grounds by an independent authoritative agency, is a very sensible idea. In most countries there is a need to protect degrees (and students) from inadequate provision and ‘rogue providers’. As higher education is becoming more and more of a business this need is probably growing. But what kind of accreditation regime should that be? Obviously, a regime that answers the need of trustworthy recognition or validation without invading the entire area of quality assurance with its stern logic of control. This would suggest *initial* accreditation rather than a fixed cycle of repeated accreditation ‘renewals’ and *institutional* accreditation rather than programmatic – albeit with certain modifications.

Initial accreditation will make it clear in advance whether the demanded preconditions for providing education are in place. And institutional accreditation will here serve particularly well as a quality protection mechanism as it secures that only responsible, well-defined and resourceful institutions – private or public, but *proper* institutions – are allowed to offer this service. This is probably the best answer to the problem of ‘rogue providers’. But initial accreditation is an *ex ante* exercise and as such it says nothing about quality of performance. Therefore, there is also a need for a complementary mechanism that makes it possible to revise or check – *ex post* – if actual educational practice is up to the given standards. As this ‘revision’ will usually have to go in depth inside more specific areas of the institutions’ portfolios, accreditation review at the level of programme or subject must also be possible. The point, however, is that initial and institutional accreditation should be the ‘normal’ procedure, with programme and ‘revision’ accreditation as the ‘second weapon’, used more as an exception and on the basis of some kind of indication. Also, if institutional accreditation is graded (giving different rights to different types of institutions) initial programme accreditation may be needed in those cases when an institution wants to provide a type of degree that goes beyond its powers as an accredited institution.

### **Accreditation and mutual recognition in Europe**

Obviously, one of the main drives behind the accreditation wave has been the enticing prospect of turning accreditation – internationally ‘converged’ through the Bologna process - into an instrument for safer and more direct transfer of qualifications from one European country to another. This begs the question of ‘how much converged’ European accreditation schemes must eventually become, since accreditation – in practical and legal terms – means different things in different countries.

Academic recognition is still a national affair, anchored in national legislation. And in spite of the Bologna degree structure, academic degrees must still be considered to be ‘owned’ by national authorities. Therefore, it is politically determined in each country how much accrediting authority is transferred – or delegated – in the two directions: ‘downwards’ to the institutions themselves and ‘upwards’ to any super-national level. In the downwards direction European countries follow slightly diverging paths but the typical feature is that institutions now have great freedom to self-accredit their own provision. In the upwards direction collaborating countries must act in unison and by

agreement, based on acknowledged or negotiated 'common denominators'. The super-national level can never go further than this.

Mutual trust and recognition exists today under the Lisbon Convention, based on the present level of quality assurance in Europe nations. If 'converged' programme accreditation is made into an instrument for a more easy and direct *application* of transferred qualifications than what takes place under the Convention's 'general' (ECTS) recognition, it is hard to see how this must not also affect the content side of higher education and thus challenge national structures that lie beyond the powers and mandates of quality assurance agencies: legal and political powers of governments on the one hand and, even more importantly perhaps, the legitimate powers of autonomous higher education institutions to design and profile their programmes inside broad degree definitions. Easy mobility and interchangeability may then come at the expense of diversity and experiment and - ultimately – educational development?