

THE WORLD BANK GROUP

International Experience for Assessing the Quality of Educational Services at Higher Education Institutions

A Policy Note for the Government of Poland

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BACKGROUND AND OUTLINE

The Government of Poland benefits from a Technical Assistance Activity in support of the reforms under way in the Ministry of Science and Higher Education. This Technical Assistance accompanies Development Policy Loans financed by the World Bank; its activities have been identified jointly by the Government of Poland and the World Bank. One activity is focused specifically on the assessment of the quality of educational services at Higher Education Institutions, specifically for post-graduate courses and training (adult education).

Specific terms of reference

The objective of the consultancy is to prepare a concise Policy Note focused on international experience for Assessing the Quality of Educational Services at Higher Education Institutions (specifically for post-graduate courses and training). This policy note should describe and compare 4-8 international strategies that are followed by OECD countries (and other countries that may be particularly innovative and interesting) that are of particular relevance to conducting the quality assessment for institutions and programs offering this level of training. A specific framework should be defined to compare the characteristics, the evaluation and the political economy of these systems.

Outline

This note is divided into three parts.

- **Part 1 (pp. 1 - 15)** develops a critical analysis of the aims and methods of quality assurance processes to assess the quality of educational services in higher education institutions and proposes a set of criteria to assess the relevance and efficacy of different methods;
- **Part 2 (pp. 16 - 33)** presents different methods used in Europe and elsewhere, and assesses their relevance, efficiency and impact with respect to the criteria identified in Part 1;
- **Part 3 (pp. 34 - 38)** develops a synthetic view of some of the best practices and draws up several recommendations to set up an efficient system.
- **Abbreviations (p. 39)**

PART 1

AIMS AND METHODS OF QUALITY ASSURANCE PROCESSES TO ASSESS THE QUALITY OF EDUCATIONAL SERVICES IN HIGHER EDUCATION INSTITUTIONS AND IDENTIFICATION OF A SET OF CRITERIA

Despite the fact that the first initiatives for developing quality assurance processes are almost 50 years old, quality assurance or assessment (QA) is still in a state of adolescence. This means that significantly different systems have been put in place in various countries and that most of them were modified several years later or are being constantly modified in order to adapt to a changing environment or simply because the institutions concerned learn how to use the system to get a better evaluation. This also means that a great number of different terms have been used (and misused) to identify different approaches to QA and that the policy-makers and specialists are far from unanimous regarding the exact meaning of the terms used and the investigation methods they imply¹. It is not surprising, therefore, that much confusion still reigns and that countries are still implementing – and often – experimenting with quite different methods.

In order to help the Government of Poland choose what might be a good system to assess the quality of higher education at postgraduate level, we shall examine what are, from our point of view, the critical characteristics of an efficient QA system focused on teaching and learning in general, that is covering bachelors, masters – consecutive or part of continuous education – in public, as well as private institutions. We shall look at the full scope of teaching and learning assessment as it raises basically the same questions of principle and also because we have not identified a system of assessment focused exclusively on Masters. To us, a good system of QA focused on teaching and learning should fulfil the following key objectives:

- Make sure that higher education institutions (HEIs) and programs satisfy at least a minimum level of quality,
- Contribute to the improvement of all institutions and programs, whatever their level, acceptable, good or (already) excellent,
- Manage to fulfil this double objective at a cost, with respect to the financial and time burden for all those involved, which is lower than the benefits measured in terms of the economic and societal benefits of an improvement.

¹ See in particular VLASCEANU, GRÜNBERG & PÂRLEA, *Quality Assurance and Accreditation, a glossary of basic terms and definitions*, CEPES, Bucharest, 2004, 2nd ed 2007;
<http://www.cepes.ro/publications/pdf/QA&A%20Glossary.pdf>

The examination of these crucial methodological points will allow us to identify a set of criteria, which will serve to examine and compare the practice in a couple of countries. In order to identify these criteria, we shall successively:

1. Examine the consequences for QA of the role and characteristics of Higher education (HE).
2. Describe the objectives and tools of quality assurance for teaching and learning.
3. Examine the key methodological solutions in establishing a good system of QA at national and institutional level.
4. Propose criteria to compare and evaluate QA systems.

1. Consequences for QA of the role and characteristics of Higher education (HE)

1.2 Role of Higher Education Institutions (HEIs)

Today we live in a knowledge-driven society and in an increasingly competitive environment. The private as well as the public sectors increasingly need well-trained people to cope with the complexity of today's products, services and organizations, to respond to additional or new demands, and to innovate. Moreover, both sectors are responsible for training the workers and citizens of tomorrow; this is not only a question of quantity, but also more and more a question of quality of those people trained in schools and in HEIs.

To state that countries need well trained people and therefore that education and higher education institutions should provide quality education for the traditional students as well as for the second chance or lifelong learners is indeed important, but it does not take us very far. The big challenge for quality assurance in Higher education is to grasp what is quality in HE and – if this can reasonably be done – to find ways to measure it. It would at least be useful to identify “proxies” for that quality, that is measurable indicators strongly correlated with real quality.

1.3 What is quality in Higher Education?

The definition and measurement of quality have been successfully developed, mainly by engineers, in industry (i.e. cars) and for services (i.e. public transport systems). In these cases, measuring quality is relatively straightforward when the production function is well established, that is when the best way to transform the inputs (labour, capital, raw and intermediary products) into outputs (products, services) is known. But, for higher education and research, the best production function is not yet well established, even though there are often many good solutions. There are many reasons for that:

- **Nature and importance of inputs:** The production of quality education depends on two types of inputs that have very little in common.
 - The students. They enter HE with a general education depending on their family background and their life experience. Their engagement in a study and/or

research program depends also on their ambitions and motivation, which, among other factors, depends on their interest and aptitude for the chosen discipline and the standing of the discipline in society.

- The teachers. The personal contribution of teachers depends on their training and life experience and on their personal motivation to do a good job. Furthermore, the collective contribution of an institution and a program depends on various factors like the composition of the teaching staff, the suitability of the programs and the pedagogy.

The potential of these two inputs depends on the quality of their working environment, in particular buildings, teaching and scientific equipment, including the new technologies of information and communication and on the content of the curricula and courses, as well as the way they are taught.

- **Measuring the outcome and impact of Higher Education:** Assessing the quality of HE is even more difficult for the following reasons.
 - Obviously, it is in general possible to measure the **quantity** of output in absolute terms (i.e. number of graduates and drop-outs, number of publications and citations, etc.) and in relative terms or as ratios (i.e. number of students per teacher, ratio drop-outs/graduates, number of publications, computers or square meters per students, etc.). However, the meaning of these figures in terms of the quality of the HE system, in particular the meaning of ratios, are often not clear in the Higher Education sector. For example, most HE systems and many institutions consider a high drop-out rate as a weakness of the pedagogical system. There are good measures to pay attention to this weakness. For ex. a more personalized student pedagogical support will contribute to cutting the drop-out rate, but the costly additional human resources will decrease the financial efficiency of the institution. And there are, of course, bad measures as well, in particular reducing the level of requirements for passing exams; this would certainly decrease the drop-out rate, but also reduce the quality of teaching and learning in the institution and/or specific programme. Moreover, comparing quantitative figures (absolute or relative) between institutions should be done with great care as institutions are to a large degree not all alike. Comparisons which are possible between similar institutions can lead to totally incorrect conclusions if made between institutions from a different type. This being said, the huge majority of HEIs do not make enough efforts to establish spontaneously the necessary management control data that should at least allow them to follow their development.
 - The **quality of output, which is so important in an HE system,** cannot be measured in quantitative/or absolute terms. It can only be measured in relative terms with respect to the knowledge profiles demanded on the labour market and in society in general, which are enormously diversified and changing - although slowly.
 - Contrary to a car, most of whose "qualities" can be measured simply by scientific means, the quality of a teaching program (output) depends on the learning

outcomes of the graduates, in other words on what they can do on the basis of what they have learned, and on the impact these graduates have on the economy and the public sector. In other words, what really counts is whether the graduates have, after several years of practice, a positive impact on the way things are done in their occupation. The debate between the proponents of training responding as much as possible to the needs of the labour market as perceived by the employers at some point in time and those insisting on training brains – that is people able to learn by themselves – is a good illustration of this dilemma.

- o The intrinsic qualification and motivation of the teachers in charge of a program impact on the learning outcome of graduates more than the programme courses and the organization of studies. In other words, an excellent teaching program on paper does not have much weight if the teaching staff are not qualified and/or not motivated.

These characteristics of the production function in higher education should make anyone responsible for QA in HE aware that it is anything but easy to measure quality in HE. The fact that the systems of higher education differ, sometimes greatly, from one country to the next and that HEIs may position themselves quite differently in these systems is probably the clearest indicator of the difficulty in defining the ideal production function in HE.

This huge diversity in HE systems justifies the efforts made in Europe to harmonize some aspects of the national systems in the framework of the Bologna process, in particular the organization of studies in three cycles, the establishment of a European qualification framework², the definition of learning outcome³ or Dublin Descriptors⁴. These efforts are remarkable, but it is important not to forget that they are courageous endeavours to describe roughly how studies should be organized and what knowledge students should acquire. However, there is still huge room for interpretation of how best to train students with different backgrounds, aptitudes, interests and ambitions for the needs of society and for the labour market of tomorrow.

1.4 Why do Higher Education Institutions not necessarily pay enough attention to quality?

Before examining what should be done with respect to QA and who should do it, it is important to briefly describe what can be expected from HEIs.

² The framework of qualifications for the European Higher Education Area (EHEA) <http://www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/QF-EHEA-May2005.pdf> and http://www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/050218_QF_EHEA.pdf

³ ADAM, Stephan, Learning outcomes current developments in Europe: update on the issues and applications of learning outcomes associates with the Bologna process, February 2008, http://www.ond.vlaanderen.be/hogeronderwijs/bologna/BolognaSeminars/documents/Edinburgh/Edinburgh_Feb08_Adams.pdf

⁴ Shared 'Dublin' descriptors for Short Cycle, First Cycle, Second Cycle and Third Cycle Awards, October 2004, http://www.tcd.ie/vp-cao/bd/pdf/dublin_descriptors.pdf

- HEIs operate in a complex system of incentives and constraints, rewards and sanctions, which is often non-transparent and even contradictory. This is due to the fact that decisions influencing the system are taken under different umbrellas and through time, often due to short-term political initiatives, without paying much attention to the logic and coherence of the whole (see Reichert, 2009⁵).
- The system of rewards and sanctions which operates in HE system, as in any other sector, does not function optimally.
 - In public universities, the excellence or poor quality of a program only marginally impacts on the numbers of students attending the programme, and even less the financial budget allocated to the programmes. Moreover, if the degree of autonomy of an institution is low, the system is caught in a vicious circle: the smaller the autonomy and therefore the greater the political micro-management, the less the institution is motivated to improve, which in turn brings with it even more intervention⁶. On the contrary, a high level of autonomy encourages institutions to be proactive and to search for excellence. This situation at the institutional level is also visible at the staff level (academic or administrative): it is extremely difficult, even impossible, for public universities to penalise those staff members who clearly underperform – by imposing remedial courses on them to make sure they fulfil more fully their terms of reference – or even by firing them. Universities also have difficulty rewarding exceptional or above-average performance; in the academic world, rewards generally come from outside, mainly as enhanced academic reputation or additional financial resources, in particular for research.
 - The situation is somehow different in the private HE sector, but is not free from difficulties. The climate of competition to which private institutions are confronted can be positive as well as negative. Competition has in general a dominant positive impact on good not-for-profit or for-profit private institutions as it drives them permanently to improve to beat their competitors. On the other hand, the climate of competition can be negative in mediocre private institutions as it encourages them to save money, in particular in keeping the teaching staff levels as low as possible and paying staff as little as possible, in order to make profits or often just to survive.

1.5 Consequences for quality assurance

The above brief description of some of the intrinsic characteristics of higher education systems and institutions leads us to two conclusions which will underlie the whole report.

⁵ REICHERT, Sybille, *Institutional Diversity in European Higher Education, Tensions and challenges for policy makers and institutional leaders*, EUA, Bruxelles, 2009, 160 p.

⁶ See WEBER, Luc, "University Governance, Leadership and Management in a rapidly changing Environment", in (chap A2.2-1) E. FROMENT & Co (eds) *EUA Bologna Handbook: Making Bologna Work*, EUA & Raabe, Berlin, 2006

1. **HEIs**, public as well as private, should spontaneously develop a quality culture in order to improve: The rapidly changing world, the climate of intense competition, limited budgets and the need to work with human resources (students and staff) as they are, should impose on HEIs a desire to do their best to utilize the resources efficiently and, at the same time, to promote equal access based on merit and independence from income. This signifies that HEIs should develop a culture of improvement by which they develop a vision that they pursue strategically, fix priorities as well as "posteriorities" , nurture their capacity for change, pay great attention to the quality of all their services, teaching and learning, research, service to the community and administrative or support services. This sounds like wishful thinking to many people, in particular at the level of ministries and QA agencies. This is understandable when one looks back over fifty years or so, to a time when professors enjoyed unlimited academic freedom and therefore considered themselves the best judge of what should be done. But the deep changes which have and are happening in the higher education environment have meant that HEIs as such have become much more conscious that they are making their future themselves and are organizing themselves to act more collectively. The development of an internal quality culture and its impact on the strategy of the institution are becoming an important element of the competitive strategy of many institutions, whether public or private.
2. **Government or preferably independent agencies** should make sure HEIs (public and private) take quality seriously and/or make sure HEIs satisfy a minimum level of quality: The shortcomings of the system of incentives, disincentives, sanctions and rewards means that the behaviour of actors and the decisions made within HEIs are rarely optimal. In other words, neither public policies and regulations, nor the market, succeed in producing decisions that are the best for HEIs and its components and the higher-education sector in general. This justifies the need for guarantors of the system to make sure that HEIs look at themselves critically to see how they perform in this framework. Such self-criticism requires the involvement of external evaluators. The relative importance of internal efforts and external view should depend on the degree of autonomy of HEIs. It is the responsibility of a largely autonomous institution to make sure it performs well in order to be accountable, whereas it is the responsibility of the State to evaluate a strongly regulated institution, as the latter cannot be made totally responsible for what it is doing.

2. Objective and tools of QA for teaching and learning

The objective pursued and the main tools or processes implemented to secure the quality of teaching and learning are the following⁷⁹.

⁷⁹ See, WEBER, Luc, "Quality assurance in European higher education: from adolescence to maturity", in (pp. 17-30) Weber & Dolgova-Dreyer (eds) *The legitimacy of quality assurance in higher education: the role of public authorities and institutions*, Council of Europe higher education series No 9, 2007, Strasbourg

⁸⁰ For an extensive list of terms used and processes implied, see in particular VLASCEANU, GRÜNBERG & PÂRLEA, *op cit*.

2.1 Minimum standard accreditation

The objective is to make sure that all institutions and programmes satisfy a level of quality that is considered as a strict minimum. The aim behind this is basically to protect the students against enrolling in a very poor institution and programme. Indeed, it is extremely difficult for young students and even for their parents to know what they should expect from an HE programme and to judge if the promises made in leaflets or on websites are fulfilled. Even if the program looks good, many institutions might be unable to fulfil their promises as they are unable to attract experienced teachers. This risk is probably higher with private institutions – certainly the small and newer ones – which have difficulties offering broad, quality programmes and breaking even financially. But the risk is not totally absent in public institutions that are strongly regulated and therefore deeply immersed in the vicious circle described above. This primary preoccupation regarding quality requires some sort of sanction. The most common is produced in a process of accreditation which should conclude in such a case with a non-accreditation. But there are other ways to sanction poor institutions, in particular the publication on internet of an evaluation report describing objectively all its shortcomings. Considering the variety of terms used in the field of QA and accreditation, we consider it useful to add that "minimum standard accreditation" aims basically at the same objective as "licensing" or "certification". However, while accreditation is indifferently used for public and private institutions, "licensing" and "certification" are more generally – but not exclusively – used for private institutions.

2.2 Accreditation of excellence

Alternatively the process of accreditation aims at determining if an institution and possibly a program have reached a pre-defined degree of excellence. In that case, the aim is not to protect the students-consumers, but to deliver a label attesting that an institution has reached a specific standard. This is useful for the institution to attract students and for the students to be willing to be admitted into such an institution. This process has the same importance for public and private institutions which aspire to being good institutions. However, if past experience in those countries that apply accreditation shows that it is not always easy to decide that an institution does not reach the minimum standard, attesting that an institution (or a program) is of good quality or even excellent is even more delicate. Indeed, it requires the judgment of peers and a set of criteria of good quality against which the performance of a specific institution can be compared and evaluated.

If the world were static, this would not be too difficult. But the world is changing rapidly with clear consequences for business, public organizations and universities. The programmes, the content of their components and methods of delivery have to be adapted continuously – although more or less rapidly depending on the discipline. Changes in technology are so abrupt that teaching programmes have to be regularly adapted. Consider, for example, the devastating impact of the development of digital watches for keeping time, lasers for measuring distance and internet, as well as Google, on specific industrial or service sectors. The great danger of establishing a set of criteria based on best practice at some point in time is that they tend to freeze the process of change within universities, which is in any case already slow as HEIs are very conservative institutions.

2.3 Supportive evaluation

Ratifying a level of quality – minimum or good – is not directly geared towards quality improvement. Although the two approaches above are aimed at approving a specific level of quality, they contribute only indirectly to a better quality through the fact that institutions have to make some or a great effort to improve in order to reach the standard. If the objective of the effort is primarily – as it should be – quality improvement, other methods which are more formative or supportive than summative should be employed. This is certainly what HEIs should spontaneously do if they are responsible and want to be accountable. It should also be the policy (strategy) of governments if they have granted a large autonomy to their institutions and, therefore, trust them.

2.4 Audit of internal quality assurance processes

Encouraging HEIs to develop their own internal quality culture does not mean, however, that they should be let totally unchecked. In a higher education system that is conscious of the importance of quality, some sort of system of verification should be set up. More precisely, the quality assurance processes internal to HEIs should be audited by an external agency in order to evaluate if there is an effort, if it is seriously done and if it contributes to quality improvement. But here again, there are at least two levels of objective. Either the audit is limited to specific QA tools – for example the evaluation of courses by students – or a real effort is made to be more comprehensive in trying to bridge any QA with the capacity of change of the institution at the level of its missions, visions and strategies⁹. Such audits of internal quality assurance measures can be formative, that is aim at helping an institution to improve their methods, as well as summative, that is sanction institutions, in most cases negatively, if their internal QA procedures are considered insufficient.

2.5 Comparative evaluation of the state of a discipline

QA systems may also concern the state of a discipline, like physics or economics, all over a country. The main objective is to evaluate the relative strength of a discipline in different institutions or in comparison with other countries. This approach to QA can be focused on the way a discipline is taught, but, in general, it responds more to a research concern; we shall therefore not follow up on this approach, although it is a useful tool to help formulate science and research policy at national level.

2.6 Benchmarking between institutions

While comparing institutions which look similar, it appears that their output in terms of research and reputations differs, often significantly. It can therefore be very instructive for an institution to launch a benchmarking exercise with one or two “sister” institutions, in order to compare the resources and outputs and to try explaining the difference in efficacy. This instrument is mostly implemented by good or very good research institutions and is mainly focused on research; we shall not comment any further on this possibility in this report.

⁹ See WEBER, Luc, “If you Believe You Are Good, Try Institutional Evaluation!” in (chap 17, pp. 259-268) A. AMARAL & Co (eds), *Essays on Supportive Peer Review*, Nova, New York, 2009

2.7 Rankings (league tables)

Since they were first released in 2003, the rankings established by the Center for World-Class Universities and the Institute of Higher Education of Shanghai Jiao Tong University¹⁹ have gained considerable interest and provoked heated polemics about how to correctly measure the relative quality level of institutions²¹. However, due partly to the difficulty of measuring the quality of teaching and learning, this ranking and most other rankings developed since then²² focus on the quality of research, which can be better measured with publications, citation and impact indexes and – although this is a weak indicator of the true quality of a whole institution – Nobel Prizes. Therefore, leagues tables identify the best research intensive universities. This is certainly a limitation of this approach, but quite an acceptable one when one considers that quality teaching and learning depend greatly on quality research, at least at the Masters and PhD levels. This technical note being focused on teaching and learning, we shall not consider league tables as a useful instrument of quality assurance.

3. Key methodological solutions in establishing a good system of quality assurance at national and institutional level

In this section, we shall look once again at the main tools and processes of QA, but from quite a different perspective. We shall concentrate on the key methodological possibilities available to set up an efficient QA system. This analysis will allow us to identify in the next and last section of Part 1 a set of relevant criteria which we shall use in Part 2 to evaluate and compare different European and non-European systems of QA.

3.1 Object of evaluation

As a matter of principle, the ideal would be to look exhaustively at all outputs, that is teaching, research and service to the community, but also at the internal processes (decision-making, management, internal quality assurance) and services (library, Information technologies, culture and sport, internationalization, etc...). However, such a comprehensive evaluation would obviously imply a huge task which would take a lot time and funds. Clear priorities should therefore be fixed and the methodology should be chosen so as to focus on a few elements which at the same time give a fair idea of quality. If we concentrate now, according to the purpose of this technical note, on the evaluation of teaching and learning, the main question is to decide if it

¹⁹ Academic Ranking of World Universities: <http://gse.sjtu.edu.cn/EN/centers.htm>

²¹ See in particular SADLAK Jean & CAI, Liu Cai (eds), *The World-Class University and Ranking: Aiming beyond Status, Higher Education for an Knowledge Society*, UNEXCO-CEPES, Bucharest, 2007 or SALMI, Jamil, *The Challenge of Establishing World-Class Universities*, The World Bank, Washington D.C., 2009 and VAN VUGHT, Frans A. , *Mapping the Higher Education Landscape; Towards a European Classification of Higher Education*, Higher Education Dynamics 28, Springer, 2009

²² For example the World University Ranking established by the Times Higher Education Supplement <http://www.timeshighereducation.co.uk/hybrid.asp?typeCode=430&pubCode=1&navcode=105>

is sufficient to evaluate or accredit institutions, assuming – or even better – making sure, that institutions care for the quality of the programmes they deliver. If one considers, on the contrary, that – for any reason – it is not possible to completely trust institutions to evaluate their programmes rigorously enough, it is also necessary to have an external evaluation process to make sure a specific program is of acceptable quality or is improved. Considering that a comprehensive university is simultaneously running several hundred different programmes leading to a grade, extending the process of evaluation to each program increases work by at least an order of magnitude. It is therefore crucial not to forget time and money factors in making this decision and at least try to find a solution to decrease the order of magnitude.

3.2 Methodology

3.2.1 Summative methods (accreditation)

A summative evaluation process leads to a ratification. In general this takes the form of accreditation (or non-accreditation) for an institution or a program, or the allocation of a special additional budget and greater reputation. This is what happened in Germany for those universities which have been considered excellent¹³ or in France for those which received investment money to modernize their buildings. A formative (or supportive) method aims at helping an institution to solve a specific problem or more generally to improve. If we look at the two most used words defining QA, accreditation is clearly a summative method – even if it is based on an evaluation – and evaluation is a supportive one.

At first sight, summative methods (accreditation) seem better as they certify that an institution satisfies a minimum level of quality or must either improve or close. In other cases, it means additional financial support, or, when excellence is accredited, it implies in general additional resources and greater reputation.

Accrediting an institution is based on the evaluation made by experts. There are in principle two ways to benefit from their expertise:

- either, they are invited to evaluate the institution on the basis of their knowledge and experience of the sector,
- or they are invited to judge how far an institution or program is fulfilling a set of pre-defined criteria which are used across the board for many institutions of the system, at least of the same category. This set of objective criteria is almost unavoidable in an accreditation procedure as a decision of non-accreditation can be contested in justice. Any organization responsible for accreditation processes is therefore bound to fix as much as possible criteria which are transparent and verifiable. However, this will not prevent experts having to interpret them according to the particular institution.

Establishing these criteria of quality is very delicate for at least three reasons:

¹³ See the German excellence initiative, <http://www.excellence-initiative.com/> or the Campus plan in France: <http://www.enseignementsup-recherche.gouv.fr/pid20637/l-operation-campus.html>

- A distinction has to be made according to what is accredited, an institution or a program? If an institution is the object of accreditation, it is obviously not possible to use criteria strongly related to disciplines. Criteria have to remain relatively general and focus therefore mainly on how the institution is coping with quality. This is the essence of the Standard and guidelines jointly set up by ENQUA, EUA, EURASHE AND ESU¹⁴ ¹⁵ within the framework of the Bologna process and adopted by the ministers in Bergen in 2005¹⁶. These standards for quality assurance are applicable to institutions for their internal quality assurance processes, as well as to national or regional agencies in charge of accreditation or of auditing internal quality assurance measures.

Inevitably, these criteria are often "proxies" for quality. They describe, in general terms, what institutions should do in the matter of quality assurance. However, this does not guarantee that an institution with a good internal evaluation process is necessarily of good quality. Fulfilling the "proxies" translates an effort towards quality, which is very positive, but does not guarantee that quality is reached. For example, establishing that a training programme for elite sportsmen and women is excellent does not guarantee that the participants will win a competition. In other words, the effort goes in a good direction, but there is no assurance that it works.

- If the accreditation applies to teaching programmes, it is necessary to get close to the discipline in an effort to identify the characteristics of a minimum program in the specific discipline and transform them into criteria. The challenge is even more serious if one wants to accredit the excellence of a programme because its quality depends also very much on its implementation within an institution; i.e. a programme judged good on paper can be poor in reality if, for example, the teaching staff are weak. This is why it is important to always keep in mind that most criteria are only "proxies" of desirable outcomes.
- Moreover, considering the rapidly changing world and the fact that the production function leaves a lot of room for personal initiatives, it is more difficult to identify criteria of good teaching practice in research intensive institutions and at master or doctorate levels than in teaching colleges and at bachelor levels. The more an institution is moving along the knowledge frontier, the more it is difficult to know what to teach and how. The teachers' drive and learners' curiosity become important factors of the success of a programme. A similar challenge exists with lifelong learning because the learners are bringing practical experience and are much more demanding for the teachers.

¹⁴ ENQUA: European Association for Quality Assurance in Higher Education, EUA: European University Association, EURASHE: European Association of Institutions in Higher Education, ESU: European Students' Union

¹⁵ *Standards and Guidelines for Quality Assurance in the European Higher Education Area*, European Association for Quality Assurance in Higher Education (ENQUA), Helsinki, 2005

¹⁶ *The European Higher Education Area- Achieving the Goals*; Communiqué of the Conference of European Ministers Responsible for Higher Education, Bergen, 19-20 May 2005

- Finally, the very fact that the process will be concluded by a sanction is not neutral on the behaviour of the organizations and people concerned. Conscious they can make an error of appreciation and be unfair, the experts, the accreditation agency and the decision-making body, if different, will be prudent, trying to avoid making a mistake. They will be rather reluctant making a proposal of non-accreditation. Nor will the institutions remain passive. In order to put all the chances on their side, they will show their best face, insisting on what they are doing well and trying to hide their weak points. No one can blame them, but this behaviour is obviously counterproductive in terms of quality improvement.

3.2.1 Formative or supportive methods (evaluation)

Formative or supportive methods represent quite a different approach. The basic idea is to help institutions to improve thanks to an evaluation of what they are doing. There are also different approaches possible. If some are totally voluntary¹⁷, most are compulsory: institutions are legally obliged to proceed to internal evaluations and to do so on a regular basis. The most profitable approach is when the methodology succeeds in creating a situation of trust encouraging institutions to share with the evaluators their strong as well as weak points to facilitate the task of the latter making recommendations to improve. This approach assumes that institutions should spontaneously make a great effort to identify their SWOT¹⁸ and be willing to dialogue openly with the experts. It is obviously easier to create this climate of trust if the evaluation is totally voluntary. An audit of the internal quality measures of an institution when conducted to make recommendations instead of sanction is also better accepted than an accreditation. This is why formative or supportive approaches have a greater impact on improvement than summative approaches. This is also due to the fact that institutions themselves are more clearly involved. Indeed, in the case of an accreditation, the report which has to be written will be drafted by a small team which is more interested in communication strategies than in analyzing strengths and weaknesses. In a formative evaluation, the best evaluations are on the contrary done when a large part of the institution is involved. This is probably why the Ministers in Berlin¹⁹ proposed a clear division of tasks: institutions should be made responsible for their internal quality, but to make sure they are taking this responsibility seriously, their internal quality assurance processes should be checked from time to time by an external agency. This verification can be relatively narrow if focused on measures promoting quality *stricto sensu* or relatively broad if the concept of quality takes into account visions, strategy, governance and the capacity for change.

The traditional criticism of formative approaches is that they do not end up with clear penalties and are only marginally based on objective criteria of quality. This would be a serious criticism if the summative approaches could in fact be severe with regard to penalties and if it was easy to identify objective criteria of quality. As we have seen above, unfortunately this is not possible.

¹⁷ For example the Institutional Evaluation program of the European University Associations; <http://www.eua.be/events/institutional-evaluation-programme/home/>

¹⁸ Strengths, Weaknesses, Opportunities and Threats

¹⁹ "Realising the European Higher Education Area" *Communiqué of the Conference of Ministers responsible for Higher Education* in Berlin on 19 September 2003

We cannot therefore say that formative approaches are too soft; inversely, they are clearly superior at promoting improvement.

Considering the relative advantages and disadvantages of both approaches, it appears that no unique and rigid system will do. The methodology employed should be adapted to the different types of institutions. For good universities – and this is much more easily measured through their research impact – competition for students, staff and resources has a positive impact. It is therefore much better to help them to improve than to penalise them. Competition does not at all play such an important role for regional universities and most teaching universities. They benefit from a captive market and recruit most of their staff locally. The incentive to do better is therefore much smaller. Moreover, for poor private institutions trying to make easy profits or to survive, as well as strongly regulated public institutions which have no incentive to improve, it is probably advisable to be stricter, that is to be ready to penalise those which do not reach a minimum standard. As we have seen, financial sanctions taking the form of additional financial support encourage more competition, which is positive. One should nevertheless not forget that these institutions are fighting for the extra money, not necessarily to improve.

3.3 Respective roles of the government, agency(ies) and institutions

It is widely agreed that quality assurance and quality improvement are a shared responsibility between HEIs and quality assurance agencies, and, in many cases, governments. This is exactly what the ministries said in Berlin²⁹ that “... consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework”. But the agreement stops here. There are widely diverging views regarding who should have the leading role – HEIs or agencies, possibly governments. The observation of different European systems shows clearly that the two paradigms exist. The chosen solution depends very much on the degree of trust governments have in their HEIs to guarantee at least a minimum level of quality or to make a permanent effort to improve their quality. It is therefore also related to the dominating philosophy: are the quality assurance processes mainly formative or summative? As mentioned before, the best solution depends on the type of institution we are dealing with. If autonomy is granted to a public institution, it should logically be trusted to be transparent and accountable. In other words, autonomous universities should be made responsible to develop all the necessary internal quality improvement processes. This should cover not only the functioning of the institution in general, but also the teaching programs delivered by the different subdivisions. Autonomous universities should be responsible for all the programs they are running. In other words, it is against the principle of autonomy to accredit programs. However, human nature being what it is, it is indispensable to check from time to time if and how it is done. This is the role of an agency – to audit the internal quality measure of an institution. However, this role remains a secondary role in the whole chain of quality measures.

The adequate relative importance of an agency compared with the institution is inverted for institutions with restricted autonomy. Basically, the public sector should check what is done

²⁹ “Realising the European Higher Education Area” Communiqué of the Conference of Ministers responsible for Higher Education in Berlin on 19 September 2003

with the money it provides, which justifies control by an external agency, control which is in general an accreditation. This logical relation between autonomy and external control is important; there is a real danger that the authorities of those countries that have difficulty in trusting their HEIs refrain from granting enough autonomy to part of their institutions simply to guarantee that they can continue to intervene. This has long-term consequences on quality as it is clearly proved that the huge majority of top class universities are very autonomous. The "business" of higher education and research is so complex that the belief of public authorities they know better than the leadership and the academic staff of a university is an illusion.

As we have seen above, the situation is different for private universities. Independently of what they are doing, the government has a responsibility to make sure they reach a minimum standard. This justifies an accreditation process, which however should be lighter for good institutions.

In the above discussion about whether the QA process should mainly be "institutions-driven or centred" or on the contrary "agency-driven or entered", we have eluded another set of questions: in particular what is the respective role of the Government, in principle represented by its ministry of education and/or higher education and research, and of a QA agency or set of agencies. The "Standards and Guidelines for QA in the EHEA"²¹ adopted by the Ministers of Education in Bergen in 2005 unambiguously give the sole responsibility of external quality assurance to agencies: *"Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders"*. The Guidelines state further that:

- *"...its operational independence from higher education institutions and governments is guaranteed in official documents"*,
- *"its procedures and methods, the nomination and appointments of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence"*,
- and, finally, *"while relevant stakeholders in higher education are consulted in the course of the QA process, the final outcomes of the quality assurance processes remain the responsibility of the agency"*.

The total independence of agencies from influences of government and institutions is essential for their credibility, hence these strong statements of the authors of the Standard and Guidelines, ENQUA, the two HE organizations and the students. However, observation of the European scene shows that this objective is still far from being accomplished in Europe. On one hand, HEIs still manage to influence the activities of QA agencies, in particular the methodology and the scope of an evaluation made by the agency. One of the main points of contention is whether QA audits should focus exclusively on the QA processes implemented within the institution or should spill over into the institutions' missions, visions and strategies, as well as

²¹ *Op cit.*

their governance. However, the worst infringements on the independence of agencies are committed by governments. In many country systems, the agency is chaired by a high-ranking civil servant of the ministry, the choice of members decided mainly by ministries, the chief of staff chosen by the ministry and the accreditation decision, if it applies, made by the Ministry. Considering the Standards and Guidelines accepted by the "Bologna" Ministers of education in 2005, and the fact that, to be a member of ENQUA²² and of the Register²³, an agency needs to satisfy the Standards and Guidelines, the whole system will be put to the test in the years to come. However, in trying to forge one's opinion about the system, one should keep in mind that the HE sector is an extremely complex and costly organization; therefore it should be protected from short-term political influences and calculation. Politicians and their advisers should refrain from politically micro-managing the system and use their time and energy to conceive, get through and implement mid- and long-term policies responding to the challenges of the knowledge society.

3.4 Impact and consequences of an evaluation or accreditation

The consequences of quality assurance processes are different from one methodology to the next and also depend on the object of accreditation or evaluation, the institution or programme. In the case of accreditation, the situation is relatively straightforward if the result is positive. The situation is more complicated if the result is negative; the institution will have to abandon its project or present an improved project. In some systems, there is no limit to the number of attempts possible. In the case of evaluation, the most important differences of practice lie with the publication of the results. Either, the experts' evaluation results and recommendations are published so that everyone interested has access to them; or they are given confidentially to the president or rector of the institution, and in case of programs, to those responsible, who are then free to keep them for themselves or to publish them. The publication of evaluation results is a good practice as it creates transparency and increases the climate of competition. This practice is strongly recommended by the European standards and guidelines. However, there is also a risk that the experts remain very prudent in formulating negative appreciations.

The main weakness of quality assurance or improvement processes is the follow-up. The tension which built up during the process and reaches a peak when experts visit the institution rapidly falls immediately afterwards. In case of a formative evaluation, the follow-up on recommendations is often too soft in particular because a procedure has not been put in place to secure the involvement of all parties concerned, the program or unit evaluated and the university leaders at different levels. In the case of accreditation, an institution makes an effort to be accredited, then tries to gain as much degree of freedom as possible, without penalizing its chance to be re-accredited.

3.5 Costs in relation to benefits

Finally, it is of great importance – as all resources are limited – to keep down the costs of these procedures (in financial expenses and in working time) in relation to the expected benefit. As we

²² European Association for Quality Assurance in Higher Education (ENQUA) <http://www.enqa.eu/>

²³ European Quality Assurance Register for Higher Education (EQAR), <http://www.eqar.eu/register.html>

have already noticed, one should not develop unrealistic illusions about the impact of quality assurance processes. Quality depends first of all on means and human resources. What quality assurance should and can do is to help institutions to better utilize their resources in order to make the best of them. The cost dimension makes the idea of accrediting all programs quite questionable. Alternative approaches where institutions are made responsible to control their program and are controlled how they are doing it are as efficient, but less costly.

4. Criteria to compare and evaluate QA systems

According to our experience as a university leader and evaluator, the strategic choices in putting up a system of QA or revisiting an existing system examined above covers well the set of strategic choices to be made. Before designing a new system, it is:

- indispensable to know the possibilities and limits of any evaluation process and
- necessary to fully understand the consequences of a specific system on the behaviour of those concerned and on decision-making, as well as its financial implications.

In order to analyse systematically in the next session a range of various systems, we have chosen a set of four criteria drawn from the various important methodological solutions envisaged above. They are:

- The object and nature (formative or summative) of evaluation
- The relative role of HEIs, agencies and possibly Government
- The consequences and impact of decisions and/or recommendations
- The cost in relation to the expected benefits

PART 2:

DESCRIPTION AND BRIEF EVALUATION OF EIGHT COUNTRY CASES

In this second part, we describe and evaluate eight national systems which appear to us as quite representative of what should be aimed at regarding promoting QA in teaching and learning in HE. The systems described range from systems which are institution-centred and/or formative to systems which are agency-driven and often concluded with a ratification. This sample appears to us as representative of the possibilities. This does not mean that they are all good or even sustainable. We shall begin with those systems that are definitely formative and finish with those that are "sanctioning". With regard to the terms of reference of this technical note, it is necessary to note immediately that none of these systems focus exclusively on academic and professional masters. Some cover all activities of HEIs, including in particular research, other are focused exclusively on teaching and learning, but cover indifferently all levels and forms of teaching. The systems examined are:

1. The institutional evaluation program of the European university Association (IEP/EUA)
2. The Irish system
3. The Hong-Kong system
4. The Scottish system
5. The French system
6. The Swiss system
7. The Austrian system of accreditation of private universities
8. The German system

1. Institutional evaluation program of the European University Association (IEP/EUA)

The Institutional Evaluation Program of the European University Association (IEP/EUA)²⁴ was launched almost 15 years ago by the Association of European Universities, better known as CRE (European Rectors' Conference), one of the two organizations which, by merger, gave rise in

²⁴ Institutional Evaluation Programme: <http://www.eua.be/events/institutional-evaluation-programme/home/>;
http://www.eua.be/type3conf/ext/bzb_securelink/pushFile.php?cuid=1410&file=fileadmin%2Fuser_upload%2Ffiles%2FInstitutional_Evaluation_Programme%2FEUA-IEP_review_report_final.pdf

2001 to the European University Association (EUA)²⁵. The programme offers to members of the Association, as well and to some non-members, on a voluntary basis, a formative evaluation of their institution. Almost 250 universities throughout Europe, as well as a few in Latin America, South Africa and also one in Japan, have been evaluated with this programme. If the methodology has been basically the same since the beginning, big efforts have been made to improve the implementation (documentation, guidance of institutions, recruitment and training of experts, encouragement to the institution to follow up on the results of the evaluation)

1.1 The object and nature of evaluation

The evaluation looks at the institution, basically how it functions and its capacity for change. In other words, it looks at the governance of an institution (missions, visions, strategies, decision-making), including internal quality assurance processes. Basically, the evaluation process tries to respond to four simple questions:

- what is the institution trying to do?
- how is the institution trying to do it?
- how does the institution know that it works (quality assurance)?
- what does the institution do to improve?

This is clearly a "fitness for purpose" approach. Instead of evaluating the institution on the basis of predefined criteria, one looks at the mission, vision and strategies of the institution and evaluates how and how far the objectives pursued are fulfilled.

The IEP/EUA is clearly formative or supportive. It was created as a service to the members of the organization who can request it if they are interested. The result of the evaluation is communicated to the President/Rector, who is nevertheless strongly advised to publish it. More recently however, interested by the methodology of the programme, some governments (i.e. Ireland, Portugal, Slovakia, Serbia, Catalonia) have mandated IEP/EUA to evaluate all their universities and their quality assurance processes. The IEP evaluation process is straightforward. The institution is invited to write a self-evaluation report, including a rigorous SWOT analysis. Then a group of five experts, including a coordinator and a student, visit the institution twice in order to check the veracity of the self-evaluation report and to examine some neglected topics. The 2nd visit is concluded with an oral report given on the spot and, one or two months later, with a written report that the institution is invited to amend if there are factual errors. The institution is invited to publish the report and to organize a follow-up visit two or three years later in order to take advantage of the criticisms and recommendations of the experts.

1.2 The relative role of HEIs, agencies and possibly the State

The respective roles of the institution and the agency are well balanced. The evaluation is requested by the institution itself, which has an important role of introspection to make in writing a self-evaluation report and in particular in going through a SWOT analysis. In the

²⁵ EUA at a glance: <http://www.eua.be/about-eua/>

traditional case where the evaluation is requested by the institution, a dynamic of improvement takes place between the institution and the IEP experts. The situation is different if the evaluation has been mandated by the national government or any authority dependent on the government. For example, the Irish University Board (IUQB) invited the IEP/EUA to evaluate the internal quality assurance processes of Irish national universities in 2003-4²⁶. In that case, the IEP/EUA report is used both by the institution to improve and by the authority to judge the efforts made by the institutions they are financing to improve and, possibly, to take action. It is useful to add that the mandate given to the IEP/EUA by public authorities may be ambiguous: some have in mind simply an audit of the internal quality assurance processes of the institution, others are more ambitious and are interested in the capacity of the institution to change²⁷. But, in any case, the IEP/EUA has been, since the beginning, strongly protected from political influence; and for the last couple of years, EUA has also made a great effort to run the Institutional Evaluation Programme independently to avoid any influence from the University World.

1.3 The consequences and impact of decisions and/or recommendations

If the evaluation has been done on a voluntary basis, it is concluded with a report given to the rector/president of the institution. If the initiative has been taken by the government, the final report is delivered to the institution, as well as the public authorities. In most cases, the institution hopes to take advantage of the evaluation to improve. For responsible leaders and institutions, this is an excellent means of contributing to the development of a quality culture. At least for good universities, the competitive climate encourages them to pay more attention to their quality, the word being used here very broadly to focus on the necessity to have a vision and a strategy and being able to implement them. However, and even if the evaluation has been done on the initiative of the institution, there is always a risk that the leadership of the university does not take on board the experts' recommendations; or the leadership might not be determined to make changes where it is very difficult to get the support of a sufficient majority of the institution. The lack of obligation to address the weaknesses is certainly the weak point of the institutional evaluation program.

1.4 The cost, in relation with the expected benefits

The cost of an institutional evaluation is not negligible, but low compared with an extensive system of accreditation of institutions and programmes. It is composed of the fees charged by the program, the expense of hosting the experts and in particular the time spent by 10-20 people to write the self-evaluation report and the time of all those interviewed during the experts' visit. Regarding the benefits, all depends on what the institution does with the report and more generally with its initiative to launch a process of improvement. In other words, the net result can be highly positive; but one cannot exclude the possibility that the institutional evaluation leads nowhere.

²⁶ <http://www.iuqb.ie/GetAttachment.aspx?id=09d7a7a9-4c5a-43f9-99e8-5de9d421ec02>

²⁷ See WEBER, Luc, "If you Believe You Are Good, Try Institutional Evaluation!" in (chapt. 17, pp. 259-268) A. AMARAL & Co (eds), *Essays on Supportive Peer Review*, Nova, New York, 2009.

2. The Irish system

The Irish university act of 1997²⁸ has put in place a very original and forward-looking system of quality assurance and enhancement. According to the 1997 Act, Irish universities are required to establish and implement internal procedures for quality assurance and arrange for a review of the effectiveness of these procedures from time to time. In addition to the strategies put in place in each university, the seven Irish universities set up in 2002 the Irish University Quality Board (IUQB)²⁹ to support their individual initiatives and in 2003, in collaboration with the Higher Education Authority (HEA)³⁰, they engaged the EUA to review the effectiveness of the procedures put in place in each university³¹. At present, IUQB is organizing the second cycle of institutional quality review, called "institutional Review of Irish universities"(IRIU)³². The process takes into account the recommendation made by EUA and is operated in accordance with the agreed European standards and guidelines. It begins in 2010 and will be organized along the lines of the handbook³³ prepared for this occasion.

2.1 The object and nature of evaluation

The general system put in place in Ireland is - to me - the closest to the model recommended in the communiqué of the Conference of ministers responsible for higher education in Berlin in September 2003³⁴. The QA system described above is clearly founded on two pillars:

- Internal procedures focused on the teaching and research in departments or other units, as well as administrative divisions (for ex. human resources) and services (for ex. libraries). Although internally organized by a quality assurance unit at the level of the leadership of the institution, these reviews are done by a group of foreign and national experts,
- An external review organized from time to time to examine the rigor and effectiveness of these internal procedures at the level of each institution.

The Irish system is basically formative. The experts visiting a department or administrative service do not come as controllers, but as peers who take advantage of their independence and experience to make recommendation based on their reading of the self-evaluation report and the result of their visit. Their criticisms and comments are meant to be constructive in helping

²⁸ Extracts from the University Act 1997:

http://www.iuqb.ie/info/quality_reviews_introduction.aspx?article=dd0cb9c8-b9cd-423d-a36b-09459be326f4

²⁹ <http://www.iuqb.ie/en/homepage.aspx>

³⁰ <http://www.heai.ie/>

³¹ EUA, Review of quality assurance in Irish Universities: Sectoral report, Brussels, February 2005; as well as 7 institution reports published in 2004 or 2005.

³² IRIU, Institutional Reviews of Irish Universities; <http://www.iuqb.ie/info/iriui.aspx>

³³ IRIU Handbook; <http://www.iuqb.ie/GetAttachment.aspx?id=c095c8f1-9b2d-4ad4-bc36-b7b121d8b458>

³⁴ Communiqué of the Conference of Ministers responsible for Higher Education, "Realising the European Higher Education Area", Berlin, September 2003

the unit to do more with what they have. The same is true for those who are evaluating the QA system implemented at the level of an institution. But the fact that there is no ratification or penalty does not mean that the criticisms and recommendation are friendly. The key to success is that the follow-up is taken very seriously both at the level of a unit and of the institution.

2.2 The relative role of HEIs, agencies and possibly the State.

The effort for quality assurance and improvement is shared between the HEIs and an agency, none being more important than the other. Most of the work is done at the level of the institution, which is made responsible for promoting quality in teaching, research and services. Nevertheless, their efforts are checked from time to time by external evaluators, to reduce the risk that internal procedures are not taken seriously enough. This task-sharing avoids the danger of establishing great machinery external to the institution, which risks being out of touch with the specificities of the institution. As the process is clearly formative, the government refrains from intervening during the cycle, but will probably, as it did for a couple of years after the EUA evaluation, proceed to an evaluation of IRIU and introduce changes to the process.

2.3 The consequences and impact of decisions and/or recommendations

The experts visiting a department or unit make recommendations. The unit is then invited to put to the leadership of the institution proposals to correct the weakness identified. The leadership then follows up on the implementation. Contrary to most other systems, the Irish system takes the follow-up measures very seriously. The same is true with the analysis and recommendations of the external agency – the EUA – in 2003-4. The EUA report³⁵ has been taken very seriously by the IUQB and HEA, who proposed a series of measures to improve the efficacy of the system and decided to launch a new institutional evaluation five years after, called IRIU³⁶.

2.4 The cost, in relation with the expected benefits

The Irish system is a rather costly one as there is a systematic review of each department and of administrative units, as well as an external evaluation of the internal quality measures. But, due to the fact that these evaluations are inspired by the fitness for purpose, the evaluation is more susceptible to help units or institutions than a system concluded with a sanction. This is in particular due to the fact that the evaluated unit or institution is more likely to participate positively in the whole exercise than when there is a risk of negative sanction at the end.

³⁵ EUA Review of Quality Assurance in Irish Universities, University Reports, HEA & IUQB, Dublin, 2005, <http://www.iuqb.ie/GetAttachment.aspx?id=09d7a7a9-4c5a-43f9-99e8-5de9d421ec02> and Sectoral Report : <http://www.iuqb.ie/GetAttachment.aspx?id=e6113579-af17-4e5f-ba45-324625d11019>

³⁶ *Ibidem*

3. The Quality Assurance system in Hong Kong

Although influenced by the former close relationship of Hong Kong with Great Britain, it is interesting to look at the system put in place in Hong Kong as it has been more influenced by practices in the United States, Australia and New Zealand than those of Continental Europe, which are more drawn to a logic of command and control.

3.1 The object and nature of evaluation

As for all systems of quality assurance, the rationale of the QA process in Hong Kong is to provide public accountability and confidence to society at large. The approach to quality organized by the Quality Assurance Council (QAC)³⁷ stems from the recognition that the HEIs in Hong Kong have distinct and varied missions. Therefore, the system does not attempt to straitjacket institutions through a single set of standards or objectives, but recognizes that each institution has objectives appropriate to their missions. The QA system therefore defines quality in terms of "fitness for purpose". As with the Scottish system which we shall examine later, the main objective is to assure the quality of student learning in those institutions funded by the University Grant Committee (UGC)³⁸. Although the audit is not done against a predefined set of standards, it does however oblige institutions to articulate and justify the standards they set for themselves and demonstrate how the standards are achieved. In brief, the model looks at the students' learning experience and is focused on enhancement. Moreover, as the institutions have self-accrediting status, which means that they are themselves – and not an external agency – responsible for the quality of all their teaching programmes, the audit is freed from the necessity to validate internal accreditation or to reaccredit programs. The audit process involves institutional self-evaluation followed by peer reviews and there is no attempt to make a comparison between institutions. Moreover, the process tries to avoid excessive intrusiveness.

As with the EUA approach, the audit is organized around a set questions:

- What is the institution's purpose?
- How does the institution achieve its purpose?
- What evidence does the institution have that its purpose is being achieved?
- What processes are in place for improvement?

The process followed by the QAC on a four-year basis is quite standard. Institutions are invited to write a self-review followed by an audit visit by a team of peers for three to four days. Then, the panel drafts an audit report with findings and recommendations, inviting the institution to amend the factual errors and to submit a brief response. The report is submitted to the QAC for consideration, publication and transmission to the UGC. The final report is published in full.

³⁷ Quality Assurance Council; <http://www.ugc.edu.hk/eng/qac/index.htm>

³⁸ University Grants Committee; <http://www.ugc.edu.hk/eng/ugc/index.htm>

3.2 The relative role of HEIs, agencies and possibly the State.

As shown above, the responsibility for QA is clearly shared between institutions and the QAC. Institutions are encouraged by the process to pay attention to quality and to self-review their efforts every four years so that their endeavours can be evaluated by a panel and the QAC.

3.3 The consequences and impact of decisions and/or recommendations

Approximately 18 months after publication of the report, the institution is required to submit a progress report on its responses to audit findings and recommendations. The QAC assesses the adequacy of the institution's action in response to the audit and offers advice if appropriate. The QAC then publishes the progress report on its website, and forwards the report and the QAC's comments to the UGC.

3.4 The cost in relation to the expected benefits

As the approach is directed towards the institution, the cost of the process is reasonable. Moreover, most of the effort made directly serves the institution which is made responsible for its improvement. The visit by peers and appreciation by the QAC, as well as the publication, mainly serve the purpose of making sure that institutions are taking quality assurance seriously and to encourage them to develop a quality culture.

4. The Scottish system of enhancement-led institutional review (ELIR)

The Scottish system of quality assurance should be particularly interesting to Poland as it focuses specifically on the enhancement of the learning experience of all types of students. The Scottish system is run by the Quality Assurance Agency for Higher Education (QAA)³⁹ which is a British agency. It is the fruit of the experience acquired over many years, since the United Kingdom was one of the pioneers in implementing QA processes. The role of QAA is to review and report on how universities and colleges of higher education maintain academic standards and quality. However, due to the devolution of government in Great Britain, QAA carries out its task using a variety of methods depending on the country and type of institutions. For example, England and Northern Ireland carry out an institutional audit which is an evidence-based process carried out through peer review. It aims at meeting the public interest in knowing that universities and colleges in England and Northern Ireland have effective means of ensuring that the awards and qualification in HE are of a specific academic standard and permanently improved. England and Northern Ireland, as well as Wales, carry out in parallel other QA methods.

4.1 The object and nature of evaluation

³⁹ <http://www.qaa.ac.uk/>

The solution carried out in Scotland⁴⁰ is particularly interesting as it is clearly focused on enhancement of the student learning experience. It is institution-led, it engages students in quality management, it is reflexive in the sense that the quality enhancement framework is also exposed to evaluation, and institutions provide a set of public information.

According to the Enhancement-led institutional review handbook for Scotland⁴¹, the quality enhancement framework reviewed by QAA is a commitment to:

- Students and the enhancement of their learning
- Partnership between agencies and higher education institutions and other stakeholders
- A theory of educational change that places far more weight on consensual approaches than on the more coercive stances embedded in some quality assurance regimes
- A culture shift – away from top-down compliance-inducing processes to participative and critical supported self-evaluation; away from audit and towards improvement; away from ruffling the surface of higher education practices and towards permeating the system with practices compatible with the quality enhancement framework; away from mechanistic models based solely on inputs and outcomes and towards other more sensitive forms of evidence of cultural change, while maintaining rigor and challenge
- Reflexivity in the sense of exposing quality enhancement itself to evaluation.

At the heart of this approach, there is a professional partnership with Universities Scotland (the "Rectors' conference"), with the individual autonomous institutions, with the Scottish Funding Council and with students and their associative bodies. One vital piece of evidence on the importance of building further on a partnership model comes again from the final external evaluation report of the system which indicates⁴²: "Not surprisingly, we have found evidence of the persistence of behaviours redolent of the displaced quality assurance regime. We have also noticed, though, that when it comes to enhancement-led institutional review (ELIR)⁴³, institutions are increasingly willing to lay out areas of imperfect practice and publicly consider ways in which they could improve on them in coming years. Perhaps the shift from the concealing behaviours associated with the previous quality assurance regimes operating in UK HE in the 1990s towards – and let it be clear that this is a direction of travel – disclosure of areas for improvement is the biggest cultural shift in thinking and the most distinctive feature of Scotland's fresh thinking about quality."

⁴⁰ <http://www.qaa.ac.uk/scotland/default.asp>

⁴¹ QAA, Enhancement-led institutional review handbook: Scotland (second edition), 2008, <http://www.qaa.ac.uk/reviews/ELIR/handbook08final/ELIRHandbook2008.pdf>

⁴² <http://www.qaa.ac.uk/reviews/ELIR/handbook08/draft/default.asp>
<http://www.google.ch/search?rlz=1C1CHM1frCH296CH303&sourceid=chrome&ie=UTF-8&q=final+report+from+the+joint+quality+review+group+to+council,+sfc+august+2007>

⁴³ <http://www.qaa.ac.uk/reviews/ELIR/handbook08/draft/default.asp>

4.2 The relative role of HEIs, agencies and possibly the State

The Scottish system is clearly institution-led. In order to bring about continuous improvement, institutions (and their constituent departments, faculties, schools, etc.) are invited to ask themselves where they are now, where they want to be in the future, how they are going to get there and how they will know when they have got there. In addressing these questions, institutions will make use of a wide variety of reference points, such as the academic infrastructure which is a set of nationally agreed reference points which give all institutions a shared starting point for setting, describing and assuring the quality and standards of their higher education courses. This set has been established in close collaboration with the UK HE sector. It takes also into account the HE qualifications framework and has regard to the Standards and Guidelines for quality assurance in the EHEA. Another reference point used by institutions will be the vision agreed by the sector and other stakeholders in Scotland of the meaning of a high quality higher education sector, namely a sector which is flexible, accessible and responsive to the needs of learners, the economy and society, a sector that encourages and stimulates learners, a sector where learning and teaching promote personal and intellectual development and employability of students, a sector where learning and teaching are highly regarded and appropriately resourced, a sector where there is a culture of continuous enhancement of quality.

The scope of ELIR includes the mechanisms to support all credit-bearing provision within the institutions: undergraduate and post-graduate, course and research students, full-time and part-time students, including those involved in credit-bearing continuing professional development, campus-based, work-based, distance-learning students.

The ELIR process is conceived and designed to support institutions' self-evaluation and reflection. Central to the methods is the institution's reflective analysis which will highlight the main and the distinctive features of the institution's arrangements for enhancing the student learning experience and securing academic standards. In order to promote that, the method is particularly linked with strategic management. The different phases of the process are

- An annual discussion facilitating the review process
- QAA will prepare an institutional profile, that is a descriptive document providing outline information for the ELIR's team
- In advance of the visit by experts, the institution is invited to prepare and submit a reflective analysis where the institution should demonstrate its capacity for self-reflection and critical evaluation. This evaluation should be evidence-based. This process should include students
- Afterwards, there are two visits of experts for a total of 5-7 days. The team is composed of 6 reviewers, a student, 4 senior academic managers, including a foreigner, and a coordinator. The visit will be concluded by a report whose aim is to provide informed peer feedback to individual institutions and to provide public information on quality and academic standards. Moreover, the ELIR team will express their confidence in the management of quality of the institution in one of the three standard forms: confidence, limited confidence and no confidence.

4.3 The consequences and impact of decisions and/or recommendations

Great importance is given to the follow-up to the report. One year after publication of the ELIR report, the institution is invited by QAA to produce a year-on response focusing on the action taken following the review and will include as much as possible consideration of the effectiveness of that action. Institutions are invited to pay particular attention in setting action that has been taken in relation to any recommendation that is associated with the confidence statement. However, institutions will continue to have flexibility in the length and style of the year-on responses they submit to QAA. QAA will then comment on these actions.

4.4 The cost in relation to the expected benefits

Obviously, most of the cost of the system lies with the institution which has to develop a rigorous quality culture at the level of the institution, and of each unit. The cost at national level is much more reasonable. It is made of the effort to develop in collaboration with different partners an efficient system of quality enhancement which is adapted to the complex and diversified higher education system and the organization of visits by experts. The question which should be asked is where the cost of QA is better invested? In external expertise evaluating institutions and programs in order to make a statement about their quality, possibly to propose not accrediting them; or to develop a global system where all those who can effectively contribute to the improvement of the teaching experience of students – students, teachers, head of department or dean, leadership of universities, QA agencies, rector's conferences – are simultaneously involved in a common process to promote improvement. The separation between evaluated and evaluators and the audit character of the process cannot obviously bring the same quality result.

5. The French system

The French system deserves a lot of attention as it is probably the most comprehensive coordinated system which pushes evaluation far in the direction of accreditation without making this final step.

5.1 The object and nature of evaluation

A new law on research⁴⁴ aimed at promoting scientific research and increasing the autonomy of higher education institutions in France gave the task to a new Agency, the "Agence d'évaluation de la recherche et de l'enseignement supérieur" (AERES)⁴⁵ – a global mission of evaluation of higher education and research. The system, which has been rapidly put in place, is very comprehensive. It covers:

⁴⁴ La loi de programme no 2006-450 du 18 avril 2006 pour la recherche:
<http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT0000000426953&dateTexte=>

⁴⁵ <http://www.aeres-evaluation.fr/>

- The institutions and organisms of research, of higher education and research, of scientific cooperation, as well as the national agency of research, in line with their missions and activities,
- Research activities of the research units within the institutions and organisms,
- The teaching programs and the diplomas of higher education institutions,
- The validation of the evaluation procedures of the academic staff employed in the institutions and organisms.

Within this extremely broad perimeter, the Agency evaluates in particular the institutions that are under four-year contracts with the Ministry of higher education and research. The Agency produces and publishes a report for all these evaluations and follows a calendar which serves to support periodical contract negotiation.

If the first and fourth evaluations are essentially of an institutional nature, the second and third are typically evaluations according to recognized national and international standards.

The Agency employs thousands of experts, some mainly disciplinary, others more institutionally orientated. These experts have to go through a load of documents relative to the object of their evaluation and then visit the institutions for a couple of days. They then draft a report, which is discussed in a wrap-up meeting and then harmonized by the staff of the Agency.

Basically, the French approach can be classified as a supportive one. The Agency evaluation contributes to showing to the evaluated institution where it stands regarding teaching and research in its different units and how the institution is performing collectively. This certainly is supportive as it helps the institution to work on its weaknesses and to move towards established standards. Moreover, the Agency organizes meetings and produces documents which could help institutions in their efforts to improve.

However, the formative aspect of the French approach is not pure. We mean by that that the institution is not the sole responsible to use the information. Two aspects have a summative note:

- The fact that the results of an evaluation are published. This has the advantage of making the evaluation transparent to all stakeholders, but it puts additional pressure on institutions and their units which may encourage them to hide their weaknesses as much as possible.
- The fact that the results are published means, if they are not good, that it is a sanction. This remark is not a criticism, but simply the identification of a fact. The Ministry and research organizations inevitably use this information in their funding decisions, which is fair. Nevertheless, an institution confronted with an evaluation is encouraged to hide its weaknesses as much as possible, instead of entering into a positive dialogue with the experts. In conclusion, and contrary to the statement of the Agency, the approach does not contribute as much as it could to a quality assurance culture.

5.2 The relative role of HEIs, agencies and possibly the State.

The above description reveals that the French system is fundamentally a centrally driven QA process. This is not surprising considering the tradition of a powerful central State which tends to regulate many things. As a matter of fact, the new Agency is somehow a return to the past. Before 2006, the institutional evaluation of institution was done by the Comité National d'Evaluation (CNE)⁴⁶, whose independence was greater. The new Agency is deeply marked by the tradition of the relevant Ministries, education and research, which have been partly merged to create a Ministry of higher education and research. Both ministries traditionally evaluated research and certified programmes. The work done by the AERES has therefore been partly aligned to the Ministry tradition. The fact that the agency is independent of the Ministry as requested by the European Standard and Guidelines⁴⁷ and the European Quality Assurance Register for Higher Education (EQAR)⁴⁸ does not change the fact that the system which has been put in place is strongly marked by the French administrative system. This is not without consequences for the separation of roles between the Agency and institutions. The simple fact that the system is agency-driven means that the role played by institutions is slightly more passive. Concerning the institutional evaluation in particular, higher education institutions are not invited to write a self-evaluation report before the visit by experts. The analysis which we would normally find in a self evaluation report, in particular a SWOT analysis, appears only incidentally in a report evaluating the implementation of the previous quadrennial contract and in a few arguments justifying the new contract. Moreover, the experts do indeed look at internal quality assurance measures, but only in a very general and non-systematic manner. In other words, the system does not efficiently promote the development of a quality culture.

5.3 The consequences and impact of decisions and/or recommendations

It is difficult to judge at first sight the impact of the Agency, in particular because the system of four-year contracts was already in practice previously. This raises a double question:

- are the decisions made by institutions to prepare the activities they would like to be financed by the contract, as well as the decisions to finance them by the ministry, better informed?
- More generally, are institutions encouraged to develop an internal quality of improvement shared by the whole university as hoped by the Agency? Logically this should be the case, but it does this certainly less than if institutions had a greater role to play with this respect than the Agency. The French solution, while comprehensive and respectful of institutions, does not escape the trade-off – the more the responsibility for quality assurance is on the shoulder of an agency, the less institutions feel themselves concerned and the more they try to minimize the consequences of a bad evaluation.

⁴⁶ <https://www.cne-evaluation.fr/>

⁴⁷ [http://www.enqa.eu/files/ESG_3edition%20\(2\).pdf](http://www.enqa.eu/files/ESG_3edition%20(2).pdf)

⁴⁸ <http://www.eqar.eu/>

5.4 The cost in relation to the expected benefits

The cost of the French system is obviously very high as it tries to be comprehensive, evaluating in parallel institutions, research units and teaching programs and diplomas. This implies major staffing at the level of the agency and thousands of paid experts. In addition, institutions are invited to draft many reports to describe what they have done with the money they received and what they would like to do in the next contractual period, or describing their research and teaching programs. The density of the system (three parallel evaluations for an institution), as well as the four-year cycle, imposes a serious stress on the staff, and finding experts competent and available at fixed dates is a nightmare. This shows how important it is when one conceives a system not only to look at what should be done in an ideal world, but also what can be done in the real world.

6. The Swiss system

The Swiss system can be described as hybrid. It tries to respond to the needs of a complex and diversified higher education system, composed of public research and professional universities, and also from small and specialized private universities, as well to respond to the necessity, at an international level, for disciplines like medicine and engineering to have their programmes accredited.

6.1 The object and nature of evaluation

With regard to the multiple aims of the system, some procedures are clearly summative, others are supportive. An accreditation procedure is applied in four cases:

- To accredit those new public institutions which are potentially eligible for public (federal) subsidies; this is a necessary condition.
- Private institutions can ask for accreditation, mainly for recognition and marketing purposes.
- For protected disciplines, which are accredited or certified the world over like medicine and engineering; without accreditation, they cannot make sure that their graduates are recognized internationally.
- Finally, some programmes in some universities are also interested in an accreditation to improve their international recognition, although they are not obliged to. This is often the case when their potential competitors abroad are in a system where accreditation is the rule (in particular Germany).

The Swiss system is also clearly formative. This is particularly the case for the 14 research universities or Federal Institutes of technology which are submitted, on a four-year cycle, to an audit of their internal quality assurance procedures.

The Swiss quality assurance system is ruled by two Federal laws on the support for cantonal universities and collaboration in the higher education system⁴⁹. It is organized around two organizations: an accreditation/evaluation agency, the Centre of accreditation and quality assurance of the Swiss universities (OAQ)⁵⁰ and the Swiss University Conference⁵¹; a political body composed mainly of the ministers of education of the cantons financing a university and the State secretariat for education and research. The agency plans and executes the different types of evaluations/accreditation, but the decisions are made by the political coordinating organ. This is due to the necessity to accommodate the double sovereignty characteristic of the Swiss constitutional (federal) system; hence, the decision-making organ is clearly not an independent organ as requested by the European Standards and Guidelines.

6.2 The relative role of HEIs, agencies and possibly the State

The responsibility for QA is somehow shared between institutions and the Agency, as well as the political decision-making body; however, as in France, the system is centrally driven. This means that most initiatives are taken by the Agency, according to its legal mandate, and universities are compelled to act or react accordingly. This is clearly the case when an accreditation is compulsory (i.e. when it is a necessary condition to be eligible for a federal subsidy or for a programme in protected disciplines, or for private institutions).

The philosophy is not as clear for audits of internal quality measures. Research universities – contrary to professional universities – fundamentally act within the framework of their institutional autonomy – which is relatively large in Switzerland. Having to report on their internal procedures to avoid the risk of being criticised, they are inclined to gather everything they do that might be considered as improving quality and put it under the label "quality assurance", hoping in this way to obtain an acceptable evaluation. There is, however, no certainty that they have really developed a coherent quality assurance system.

6.3 The consequences and impact of decisions and/or recommendations

They are clear in case of an accreditation. The decision made by the Swiss University Conference is a life-death question for those institutions which count on federal subsidies and is also extremely important for other institutions, in particular private ones which need this recognition to promote their business. The situation is less clear in case of an audit of internal quality assurance processes. Those institutions that are audited, in particular research universities, obviously prefer a positive report to a negative one. However, it does not mean that they will necessarily – because of the audit – give first priority to improving their quality assurance procedures. A change of attitude will be more likely if the threat foreseen in the law to take into account the quality of their internal procedures to fix the federal subsidies will be put in effect, although the implementation of such a threat would create a political row.

⁴⁹ Bundesgesetze von 8 Oktober 1999 über die Förderung der Universitäten und über die Zusammenarbeit im Hochschulbereich (Universitätsförderungsgesetz, UFGH)

⁵⁰ Organ für Akkreditierung und Qualitätssicherung der Schweizerischen Universitäten

⁵¹ Schweizerischen Universitäts Konferenz ou Conférence universitaire suisse

6.4 The cost in relation to the expected benefits

The Swiss system is rather heavy: in addition to the audit of institutions, many programmes are accredited. This requires hiring a lot of experts and much preparatory work by the institution.

7. The Austrian Accreditation Council for private universities

The Austrian case is interesting as it proposed ten years ago a solution to protect the name "university" at national level and to restrict the attribution of the official grades – bachelors, masters and PhD – to public institutions and to those institutions that have been accredited as a "private university". A parallel organization has been set up to accredit professional universities (*Fachhochschulen*). The principle of accreditation of private universities and the setting up of an Accreditation Council has been regulated in law⁵².

7.1 The object and nature of evaluation

The objects of evaluation with the final purpose of accreditation are both the institution as such and each study program, whatever the level, Bachelor, Master or PhD. As both evaluation and decision-making organ, the Accreditation Council⁵³ elaborated during its first years of existence a set of criteria⁵⁴ aimed at synthesizing the important conditions to satisfy to guarantee a sufficient level of quality and financial sustainability of private institutions. These criteria fix in particular the minimum number of academic staff for the institution and each teaching program, their level of qualification and experience, their recruitment process, the required proportion between internal and external staff and the duration of their contracts. It looks also at the institutional autonomy of the institution, at building and other equipment, internal quality assurance processes, as well as its midterm financial plan. They also request that, to be accredited, a new university must propose a minimum of two disciplines.

7.2 The relative role of HEIs, agencies and possibly the State

The accreditation process is essentially driven by the Accreditation Council, which is at arm's length from the ministry of education and science. The evaluation process concluded with accreditation is formalized and uniform for any type of institution. Institutions interested in setting up a private university have to prepare an application, that is a document describing in detail the aims and means of the new institution. This first document will be examined by the secretariat of the Accreditation Council to see if it contains the most important information; otherwise, a supplementary document will be requested. Then, the Council, which is composed of eight experts, four Austrian and four foreign, chooses 2-4 experts of the discipline, mainly from outside Austria, to examine the request and visit the institution accompanied by a member

⁵² Bundesgesetz über die Akkreditierung von Privatuniversitäten (Uni AkkG), BGBl 1999/168 idF BGBl I 2000/54; http://www.akkreditierungsrat.at/cont/en/council_legal_foundations.aspx

⁵³ See information about missions, organization and practice of the Austrian Accreditation Council at <http://www.akkreditierungsrat.at/cont/en/index.aspx>

⁵⁴ http://www.akkreditierungsrat.at/cont/en/acc_standards.aspx

of the council and of the Secretariat. These experts are invited to send the Council a report, which is submitted to the institution for comments. Then the members of the Council and of the staff who visited the institution write a report preparing the decision of the Council. The Council listens to the rapporteur and discuss, generally at length, how far the Accreditation Council's criteria are fulfilled. The discussion is concluded with a vote; accreditation is given for five years if the majority of the eight members accept the principle. The Austrian Accreditation Council is the decision-making organ, and the final "seal of approval" – given by the Federal Ministry of Science and research – is mainly formal. The accreditation lasts for five years, after which the university has to apply for reaccreditation for another period of five years. After ten years of accreditation, the accreditation is more or less secured.

The Accreditation Council also has a checking function. Accredited universities have to write an annual report which is evaluated by a member of the Accreditation Council who informs the Council when one or many criteria are no longer fulfilled. An accredited university which wants to set up new programs has to ask for the accreditation of each new program.

It is worth noting that in the Austrian system is clearly agency-centred with regards to the accreditation of private universities. The experts mandated to evaluate an accreditation request and the member of the Accreditation Council chosen as rapporteur have the most important roles. Institutions applying for accreditation have a range of conditions to satisfy, among which internal quality assurance process is minor. The Ministry itself has just a formal role.

7.3 The consequences and impact of decisions and/or recommendations

In the Austrian system, the consequences of the process are severe: accreditation or non-accreditation. The impact of the decision is nevertheless reduced as institutions aware of a negative decision are allowed to withdraw their request and present a new one immediately and as many times as they want. At first sight, the Accreditation Council has a record for severity as only half the projects presented to it have been accredited. However, this result is largely due to the fact that it is extremely difficult to launch a new private university, which explains why many projects are really poor. It is interesting to note also that the secretariat, and sometimes the board members, voluntarily or involuntarily plays a coaching role of the institution in responding to many questions and giving advice to the promoters during the preparation of their request. This is disputable in terms of the total independence of an organ, but it contributes at least slightly to improving projects, which is the ultimate role of a quality assurance process.

7.4 The cost in relation to the expected benefits

Even without taking into account the preparation cost from the university side, the process of accreditation is expensive, in particular for institutions with many programmes (university of music), as they have all to be accredited, in addition to the institution itself. However, because of the very fact that private universities have to be accredited in order to offer university programmes and deliver Austrian degrees, the process prevents the creation of very poor institutions. However, from my point of view, the law that has been passed under the initiative and pressure from people wanting to open private universities is not tough enough regarding the necessary conditions for opening a private university. This explains why a few accredited universities do not have much to do with a university. This being said, the law has had the merit of putting some order into the domain of private institutions and to protect – although

insufficiently – the name “university” in Austria. There are at present political discussions to revise the law in order to make the process lighter (with the risk of weakening it completely). The accreditation council also proposes to submit lifelong learning programmes within universities to an accreditation process, arguing that they are mostly the result of a private initiative. This is disputable, at least for those who are convinced that universities should be responsible for all their output.

8. An alternative system in a state of great flux: Germany

It is necessary, in order to be fair to all systems, to make a short description of the German system as it has been for a long time considered as the leading and most comprehensive accreditation system. However, a couple of years ago the system entered a period of turbulence, as it was considered by many as much too heavy. Although the problem was recognized much earlier, the most visible reaction up to now has come from the German Association of University Professors and Lecturers, which includes 25,000 academics, which recently refused to participate to accreditation processes⁵⁵ as a protest against the Bologna bureaucracy. It is nevertheless useful to describe what the system was trying to do and how, and to identify the difficulties it was facing justifying a reform.

Without entering into detail, let us say that the German system is organized as a Foundation for the Accreditation of Study Programmes in Germany and is organized around an “Accreditation Council”⁵⁶ at the federal level as the central decision-making body and nine accreditation agencies⁵⁷ it has accredited. The purpose is to accredit approx. 15,000 teaching programmes (bachelors and masters) offered by state or state-recognized universities and professional colleges (*Fachhochschulen*). The accreditation process is made up of several stages and is based on a peer review principle. When a higher education institution submits an application for the accreditation of a study programme to the relevant agency, the chosen agency deploys an evaluation group whose composition must be a reflection not just of the specialist of the content focus of the study programme, but also its specific profile. On the basis of their assessment report, and in accordance with the regulations provided by the Accreditation Council, the responsible accreditation commission from the agency decides either to grant an accreditation for the relevant study program, to grant an accreditation with conditions, to abandon the process or to reject the accreditation.

Accrediting all study programmes was obviously a huge task, simply because of the size of the country, even though the task was spread over nine agencies. In consequence, the rate of evaluation for final accreditation was slow so that it was not realistically accrediting all

⁵⁵ DHV Ruft Mitglieder auf, sich nicht mehr als Gutachter an Akkreditierungsverfahren zu Beteiligen, 18.12.2009: <http://www.hochschulverband.de/cms1/pressemitteilung+M513434c0079.html>

⁵⁶ Foundation for the accreditation of study programmes in Germany; http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/Stiftung/recht.Grundlagen/Foundation_Law.pdf <http://www.akkreditierungsrat.de/index.php?id=9&L=1>

⁵⁷ Foundation for the accreditation of study programmes in Germany; <http://www.akkreditierungsrat.de/index.php?id=5&L=1>

programmes in a reasonable timeframe. Moreover, only a handful of programmes have not been accredited or accredited under condition. It would be nice to be able to pretend that this apparent success was due to the efforts made by institutions to make sure their programmes would be accredited. Unfortunately, the hard truth is more probably that it is very difficult to refuse accreditation for programmes which are obviously not good, but not clearly bad, in particular if they more or less fulfil the formal written criteria.

Aware of these difficulties, the Accreditation Council decided in 2008 to move to what they have called "system accreditation"⁵⁸. Although it is not quite clear to many external observers exactly what it means, we can say that the new system puts more importance on the internal quality assurance system of an HEI in the fields of teaching and learning⁵⁹, with a final aim to trust those institutions which have a good internal system of quality assurance to judge for themselves the quality of their teaching and learning programmes. The structures and processes relevant for teaching and learning are assessed with regard to their appropriateness for achieving the qualification objectives and for ensuring the high quality of the study programs; they should comply with the European standard and guideline for QA in HE, the standards of the Ministry of education and cultural affairs, as well as with the criteria of the Accreditation Council itself. A positive system accreditation attests that the quality assurance system of a Higher education institution in the field of teaching and learning is appropriate to achieve the qualification objectives and to ensure the quality standards in its study programmes. To be admitted as an institution to system accreditation, an institution must have at least one accredited program for every 2,500 students enrolled in the last winter semester. In other word, system accreditation aims at decentralizing the accreditation of programs, provided institutions are accredited for system accreditation. As the system is still in launch phase, it is very difficult to evaluate how it will be implemented by both agencies and institutions. The positive point about this change is that the whole system will be lighter and probably cheaper to run. It is nevertheless interesting to note that it is only with resistance that the Accreditation Council trusts higher education institutions to evaluate the quality of the programmes they are providing, under the supervision of an agency.

⁵⁸ Akkreditierungsrat, Criteria for System Accreditation, Printed Matted 11/2008; http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/Beschluesse_AR/englisch/Kriterien_Systemakkreditierung_eng.pdf

PART 3:

CONCLUSIONS AND RECOMMENDATIONS

1. About the technical note

Even if QA is still in a state of adolescence, today, no serious person is putting the necessity of QA in HE in doubt. The reasons are various:

- the high cost and fast-changing environment of HE require that the available resources are used as efficiently as possible to fulfil the multiple missions of HEIs in teaching and learning, research and service to the community,
- the high degree of autonomy granted to some institutions justifies, on their side, the need for a high level of transparency and accountability towards their stakeholders, which can be largely promoted by adequate systems of QA,
- exaggerated and often discouraging public regulation or intense pressure of competition for small and weak institutions call for some sort of QA system at national level to assure a minimum level of quality and, if possible, to promote quality,
- and in Europe, the Bologna process has made of QA an important tool for the success of the process.

QA should cover all aspects of university life, that is teaching and learning, research, service to the community, internal services and management for both public and private institutions. Moreover, QA should not only aim at making sure that the quality of an institution or a programme is acceptable, but should also promote improvement. This double level of ambition is extremely important: QA – in the narrow sense of the word – concerns essentially modest institutions or programmes for which it is desirable to make sure they nevertheless satisfy a minimum level of quality, whereas QA – in the generic sense of the word – demands that quality improvement should be a preoccupation for all institutions, whatever their level. Indeed, all institutions can improve, even those ranked among the best.

According to the terms of reference, this technical note is focused exclusively on teaching and learning, more particularly at the level of academic and professional masters. We have therefore assumed that the other aspects of university life, in particular research, are evaluated with other programs.

2. About the principles and criteria

If we consider that QA should, for most institutions, promote improvement, more than simply secure a minimum level of quality, it appears that some systems are better conceived to do it than others.

- This depends primarily on whether institutions are at the centre of the process or mainly the object of an audit. In other words, the crucial question is whether the QA process is agency driven or institution driven.
- Higher education systems being extremely diverse and institutions having to be increasingly adaptable, a system which looks at the fitness for purpose is without any doubt better adapted to the HE environment and to HEIs than an evaluation according to predefined criteria.
- Moreover, QA systems should be cost-efficient, that is justify in terms of improved quality the total cost of the evaluation process.
- Finally, experience worldwide shows that follow-up to an evaluation, whatever its nature, is very important.

These principles have led us to examine the practical national cases in looking essentially at four criteria: 1) the object and nature of the QA process, 2) the relative importance of agencies versus institutions, 3) the follow-up and 4) the efficiency (benefit-cost relationship).

Before attempting a synthesis of the good and weak points of different systems, we need to stress that all the systems that we have examined, as well as other systems we know of, are focused on teaching and learning in general, without making a special distinction between different levels. They all cover both BAs and MAs, as these two grades are considered in most countries as part of the normal length of study. Moreover, the traditional distinction between research universities and professional schools or colleges is getting thinner and thinner as both types of HEIs deliver BAs and MAs. Therefore, no clear distinction is made between programmes whose nature is more academic or more professional. If a distinction is made, it is with PhD studies. Some systems consider PhD studies mainly as studies, others as research, with the consequence that it is evaluated either as part of teaching and learning or as part of the evaluation of research. The situation is less clear with lifelong learning. Most systems ignore these programs as long as they are not concluded by a Bologna grade of BA or MA. And, when they lead to a Bologna grade, they are treated like any Masters degree, although they are not a "consecutive master", being generally followed by students a couple of years after graduating.

3. Tentative synthesis

In view of the objective of this technical note to help identify best practice in evaluating teaching and learning in all types of HEIs, private and public, vocational and research-led and for traditional students as well as for second chance or lifelong learners, we shall now make a brief – and approximate – comment on the different systems we have examined. The aim is to hint at the system we would look at if we had to develop from scratch a new system for Poland.

German system: Even though it was one of the most ambitious systems of accreditation of programmes, we would advise staying away from the German system on the whole. The main reason is that it aims at accrediting all study programmes, which is a gigantic task, as well as a disputable one for scientific and didactic reasons. Moreover, the system is too much agency-centred and therefore does not sufficiently encourage HEIs to make an effort to improve. The

necessity to pass the accreditation once in a while is not enough, all the more so because the great majority of programmes which passed the test were successful. The present transformation towards system accreditation is certainly going in the right direction, but it is too early to know if the new system will correct the weakness of the original one. For a big country like Germany or Poland, there is one element which is worth taking, the decentralization of the evaluation task over a couple of agencies which should be, if only institutions are evaluated, specialized for different types of HEIs.

The Austrian system of accreditation of private universities: Despite the fact that it is a partial system, it is worth looking at in a country which counts a great number of private universities. It contributes to creating more transparency on the private sector by fixing which universities are allowed to call themselves "private universities" and consequently deliver Austrian (Bologna grades) and which are not allowed to because their quality level has been judged insufficient by experts and the Accreditation Council. The system is therefore clearly summative and agency-led. It contributes indirectly to improving quality by fixing the minimum quality standard for accreditation; however, the internal quality processes imposed as criteria for accreditation remain very superficial. The Austrian system has without any doubt contributed to putting some order in the Austrian private university sector.

The Swiss system is one of the most hybrid systems implemented in Europe. This reflects the necessity to comply with the federal Constitution, as well as the necessity to adapt to the huge variety of institutions. The system requests a strict accreditation procedure on the basis of predefined criteria for public institution eligible for Federal State support and for private institutions; the accreditation is also used by some institutions, for some programs, in particular those in protected disciplines, to get the necessary seal "accredited". Relatively strict with regard to accreditation, the Swiss system is on the contrary relatively soft with respect to encouraging universities to develop a rigorous internal quality improvement culture. The regular audits made by the OAQ of the quality measures within universities have been – at least up to now – relatively soft and too narrowly focused on quality measures *stricto sensu*, without paying enough attention to the capacity for change. Nevertheless, the Swiss system is interesting because of its multiple tools.

The French system is probably the most comprehensive and well coordinated system in Europe. It not only looks at the governance, management and quality assurance systems of institutions, but it also goes over the research performance of research units (departments, institutes, laboratories) and the quality of all teaching and learning programs. In other words, the system is faithful to the tradition of a centralized nation used to having a strong central administration that takes decisions about more or less everything. To us, its main weakness comes from the fact that it is mainly agency-driven and that it does not sufficiently encourage units to develop a quality of improvement. Institutions and units are under pressure to receive a good mark and therefore do not play the game which would be so useful to them to recognize openly their weaknesses in order to work on them with an external support. Instead, every four years, they are confronted with an evaluation telling them either that they are good – and therefore do not have to worry, although they could certainly improve even more – or that they are weak, which is depressing and not very helpful and might invite an attitude of acceptance, instead of a determination to improve. We can nevertheless consider the French system for a Nation with a strong regulatory tradition as the most centrally driven acceptable.

The EUA institutional evaluation programme belongs to another category and should be judged accordingly. The program was set up to serve EUA members and help them, on a voluntary basis, to measure where they are regarding governance, capacity for change and quality assurance. The approach imposes a fifty-fifty effort. Universities have to make an effort to write a self-evaluation report including a SWOT⁶⁴ analysis. Then, the visit of five experts – among them a student – aims at judging the honesty of the self-evaluation report and to make recommendations. Among all systems examined and known, it is the most “fit for purpose” and formative. The impact of an EUA evaluation nevertheless depends very much on the institution, which is free to put the report in a drawer or to actively try to follow-up on the experts’ recommendations. Moreover, as the pool of EUA experts is relatively large and the guidelines open, there is no guarantee that the recommendations are not people dependent; however, this is true for all systems based on peers. The best aspect of the EUA system is that it is quite good in promoting a dynamic of change and quality improvement.

The Irish system is probably the most comprehensive we have examined. We very much like this system as it is institution-driven. The law makes it compulsory for institutions to develop a rigorous internal system of evaluation and improvement of teaching and learning, research, outreach at the level of departments as well as the efficacy of university services like computer and library services, student management, social services, along with institutional governance. The law however foresees an evaluation of these internal quality assurance measures on a regular basis by an external agency. The evaluation done in 2003-04 by the IEP/EUA showed that institutions are taking their responsibility very seriously and that, on the whole, the Irish system of quality assurance promotes quality in the higher education sector in the most efficient way, that is in making institutions responsible for the quality of all their services and in making sure that they take their responsibilities seriously.

The Scottish system is based on the same inspiration as the Irish one to make institutions responsible for promoting improvements. The main difference is that it is focused on teaching and learning, research being evaluated through other channels. This explains why the Scottish system is probably the most refined system of QA we have examined. If the aim of the Polish government is mainly to improve teaching and learning at the levels of bachelors and masters – consecutive or non consecutive (continuous education) – in public and private institutions, the Scottish system is worth examining very seriously.

The Hong Kong system does not bring anything new from a European point of view. However, it is also an interesting system as it puts a lot of emphasis on the responsibility of institutions to promote quality in teaching and learning and on the supportive role of a national agency. It is certainly interesting to realize that a system inspired as much by Australia, New Zealand and the United States as by the United Kingdom is also favourable to a system where institutions have an important role to play and where the main responsibility of agencies is to test whether they are taking their responsibility seriously.

⁶⁴ SWOT = Strengths, Weaknesses, Opportunities, Threats

4. Final remarks

This report has helped us to identify the main key characteristics of a good quality assurance system. To us, it should in particular:

- Be capable of correctly grasping the essence of university teaching and learning and being able to seize it correctly,
- Encourage universities to develop a quality culture promoting improvement instead of encouraging them just to pass the criteria necessary for accreditation or similar ratification,
- But it should also provide an external check and support.

To make it happen, the system should

- be focused on the fitness for purpose of the strategies followed by HEIs and quality assurance processes more than on pre-defined criteria,
- Be as much institution-driven as agency-driven, which means that internal quality assurance procedures are an important element of quality assurance,
- Be as light as possible by pushing the concerned institution to do a great part of the work as it is finally in its interest and by avoiding processes in which the bulk of the work is done by external experts,
- Finally be partly adapted to the type of institution. The higher the level of the institution measured by its research performance and quality of its teachers and students, the more it is advisable to have an institutionally-led system. On the other hand, modest professional schools or universities, particularly if they have been strongly regulated for a long time, as well as private institutions that are permanently fighting for survival, are more in need of a rigorous external evaluation made by an agency. This does not mean, however, that they are freed of developing their own internal QA system as it is also important for them to put quality as a high priority.

The systems which seems to us as those satisfying at best these conditions are the Irish, Scottish and Hong Kong systems, at least for public universities, the case of private universities being taken over by a system inspired from the Austrian or Swiss one with respect to accreditation.

ANNEX 1: ABBREVIATIONS

TECHNICAL EXPRESSIONS	
HE	Higher education
HEIs	Higher education institutions
QA	Quality assurance and improvement

INSTITUTIONS	
AERES	Agence d'évaluation de la recherche et de l'enseignement supérieur
CUS	Swiss University Conference
EHEA	European Higher Education Area
EQAR	European Quality Assurance Register for Higher Education
ENQUA	European Association for Quality Assurance in Higher Education
ESU	European Students' Union
EUA	European University Association
EURASHE	European Association of Institutions in Higher Education
IEP/EUA	Institutional evaluation programme of the European university association
OAQ	Centre of accreditation and quality assurance of the Swiss Universities
QAA	Quality Assurance Agency for Higher Education
QAC	Quality Assurance Council
UGC	University Grants Committee