On the further development of the accreditation system - the Institutional Quality Audit model

Resolution of the General Meeting held on 24 April 2012

HRK German Rectors' Conference

The Voice of the Universities

Abstract

Whilst accreditation processes have seen positive developments from the perspective of higher education institutions (HEIs) since their introduction, they still remain based on a control-oriented approach. Although system accreditation has been made more straightforward[1], the General Meeting of the HRK still sees a need to emphasise self-assessment within the HEIs' quality development more strongly than is currently the case. The General Meeting of the HRK is, therefore, calling to develop system accreditation into an Institutional Quality Audit (IQA) as soon as possible. The primary objective of an IQA will be to promote the development of quality in teaching and learning by initiating and implementing an ongoing process of improvement at HEIs. Teaching staff and students will be expressly granted some freedom in designing these processes, so that they are motivated to continue striving for better quality in the long term. This will both support a decentralised understanding of quality development in teaching and learning and specifically allow greater autonomy, thus strengthening the sense of responsibility in departments and faculties when designing programmes. The IQA proposed here also realises the fundamental philosophy of studying within the European Higher Education Area. Regarding these matters, the IQA has the following advantages:

- it connects with the self-defined objectives, strategies and programmes of an HEI and therefore promotes its autonomy and profile development;

- it applies the standards of the European Standards and Guidelines (ESG). It is, therefore, compatible with the European and international external quality assurance processes for HEIs and can facilitate international student mobility;

----

1) Regulations for the accreditation of degree programmes and for system accreditation, http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/Beschluesse_AR/Beschluss_Regeln_S tudiengaenge_Systemakkreditierung_23022012.pdf, accessed on 15.3.2012

- its results are aimed primarily at prospective students, students, parents, potential employees and employers, and it is, therefore, an instrument that HEIs can use to attract the "best minds" nationally and internationally;

- it does not induce any immediate statutory administrative approval and is, subsequently, not directly controlled by the government, although it still justifies the confidence of the state in transferring, for example, with target agreements, the right to approve, amend and withdraw study programmes to any HEI that has been successfully audited;

- it represents a further stage of development compared to system accreditation.

The basic idea behind the audit is to lend credibility to the performance of the internal quality management system at HEIs. The following features will support this:

- a focused self-evaluation report prepared by the HEI, in which its vision and mission, goals and strategies are presented;

- a concisely written quality management handbook specific to each HEI documenting the structures and processes of quality management that the HEI uses to pursue its self-defined quality objectives in teaching and learning within internal and external reference frameworks.

The IQA is to be arranged jointly by the HEI undergoing an audit and the "Quality Council" .The "Quality Council" is formed from the current Accreditation Council with academic expert members providing the majority on the main committees. In coordination with the HEI undergoing an audit, the Quality Council shall name the group of auditors that will report on the performance of the HEI's internal quality management system. This report shall also include details of any obligatory and optional fields of improvement in the quality in teaching and learning and conclude by advising on the success or failure of the audit. If successful, the Quality Council will award a "Quality Label".

The introduction of the IQA will require some changes in the roles of the agents within the system:

- the "Foundation for the Accreditation of Study Programmes in Germany" (Accreditation Council) will be converted into a "Quality Council" by restructuring and re-constituting its committees. The Quality Council will consist of a committee of renowned experts in quality management for higher education and will show a much greater degree of academic influence. Decentralised subdivisions may help to avoid capacity bottlenecks and counteract any undesired effects of centralisation. Members will be nominated by mutual consent of the HRK, the German Council of Science and Humanities, the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) and external shareholders. These institutions themselves are represented on the Foundation Board. An administrative arrangement between the federal states will strengthen the new institution in its role as an institution for coordination, monitoring and development.

- accreditation agencies will be given the role of consultants that may, if desired, provide HEIs with support in improving quality.

- HEIs may select agencies from the European Quality Assurance Register (EQAR).

HEIs will still have the option of programme accreditation for individual study programmes.

Details regarding the need for and design of the IQA may found in the following full version.

Full version

1. Developing the accreditation processes: needs and objectives

Accreditation was introduced in Germany with the two-fold aim of safeguarding quality in teaching and learning as well as continually improving it. Replacing the unwieldy system of general examination regulations that had to be negotiated in a lengthy process between the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) and the German Rectors' Conference (HRK), the swift accreditation of study programmes was intended to enable HEIs to design their range of study programmes in keeping with their own particular role in the academic system and their responsibility to society. However, this requires a system of quality assurance and development that expressly provides teaching staff and students with more freedom to shape teaching and learning, so that they are motivated to continue to strive for better quality in the long term. Such a system strengthens the faculties' autonomy in designing study programmes and motivates the teaching staff to develop quality in teaching and learning and to assume greater responsibility.

Programme accreditation has not achieved this to the desired extent. The procedures have often proved to be overly bureaucratic, focusing on minutiae. As a consequence, such processes were seen as control mechanisms that had little to do with the efforts towards quality made by the faculties/departments or the HEI as a whole, and which rarely inspired a desire to actively shape improvement processes.

Looking beyond the national situation to the European Higher Education Area also confirms that the trend in external quality assurance - depending on the "maturity" of the system of external quality assurance - is away from the accreditation of individual programmes towards a development-oriented audit of the institution as a whole. This can also be seen in amendments to the German accreditation system: the introduction of system accreditation was the first step in this direction, particularly after the initial, excessively rigid regulations had been relaxed. Although there has, therefore, been some development in system accreditation to the HEIs' advantage, this can only be regarded as an interim step as the process approach is essentially still based on regulations that are rather control oriented.

A further stage of development in the accreditation system is required to initiate a continual process of improvement in the quality of teaching and learning at HEIs, so that even in a changing environment (such as scientific advances, or changes in the demands of the employment system) students still have access to a consistently high-quality range of study programmes that meets their needs and is oriented toward the HEI profile. The introduction of an Institutional Quality Audit (IQA) would achieve this required development. The following sections outline some first considerations regarding the IQA.

2. Characteristics of the Institutional Quality Audit (IQA) in comparison with previous accreditation procedures

Since the Conference of Higher Education Ministers in Berlin in 2003 at the latest, it has become clear 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."[2].
Following this principle, European HEIs are responsible for organising teaching and learning independently against the background of an increasingly differentiated higher education landscape. HEIs design study programmes with a regard to institutional vision and mission, goals and strategy so that they can offer a wide-ranging academic education to both national and international students. The different goals and strategies of HEIs are crucial in defining the qualification objectives of their study programmes and the intended learning outcomes of each part of the study programmes.

The internal quality management system at the HEI has the role of initiating and maintaining the process of continual quality improvement in teaching and learning, as well as designing and drafting the internal processes for quality assurance and development. An important element here is that teaching staff and students are given enough leeway to shape the curricula in accordance with the constitutionally safeguarded principles of academic freedom. A prerequisite for operational implementation is that the HEI formulates precise objectives and that they are "broken down" at the level of the programmes. This will create an outcome-oriented connection between the objectives in teaching and learning, the learning outcomes and quality management, thus supporting accountability. HEI management and the deans of the faculties/departments are to cooperate in this implementation process, since as representatives of the central and decentralised levels respectively, they each have a specific responsibility under the principle of subsidiarity: HEI management and the academic senate are responsible for the overall concept of quality assurance and development;

----

2) "Realising the European Higher Education Area", Communiqué of the Conference of European Ministers on 19 September 2003 in Berlin, p. 3, http://www.bologna-berlin2003.de/pdf/Communique_dt.pdf

the faculties/departments and their boards are responsible for quality in the design of the individual degree programmes.

Supported by regular, academic-led assessment, external quality assurance has the task of examining the HEI's internal processes of quality assurance and development for teaching and learning and of ensuring that they are, in fact, improving the quality. This will enable the HEI to prove to prospective students, students, parents, employers, politicians and legislators that they are indeed fulfilling their duties and responsibilities to society. An Institutional Quality Audit (IQA) is ideally suited to meet the requirements of an academic-led review process with the focus on assessing the performance of the internal quality management system in achieving the institution's own objectives for teaching and learning.

The IQA measures the HEI not only against generally agreed standards, but also against the quality standards claimed by the HEI itself. This enables the IQA to provide appropriate assessments of the different visions and missions of the individual HEIs.

An IQA may apply to the entire HEI or to distinct sections of it that have an independently controlled quality management system (e.g. selected faculties, departments or departmental groups). Conducting an IQA in individual sections strengthens quality management relating to academia in the faculties and provides valuable suggestions for improvements to the quality management system throughout the institution.

The IQA is also to be regarded as an iterative process; it makes it possible to understand and evaluate the progress of a HEI in pursuing its quality objectives and developing its learning process as an organization over an extended period of time. To this end, it should be repeated every seven years.

Even where an IQA is introduced, the option of accrediting study programmes will remain, because programme accreditations examine the quality of an individual degree programme in detail, which may be of interest for HEIs with regard to continuing education subject to study fees or in initiating and maintaining international cooperation agreements. In addition, the universities will still be able to have individual programmes certified through internationally operating agencies and professional bodies.

3. Consequences of a successful Institutional Quality Audit

On completion of a successful IQA, the HEI is awarded a "Quality Label", based on the votes of the auditors. This certification is awarded by the Quality Council, which consists of a restructured Accreditation Council. This Council is to have several regional subdivisions, the precise number of which has yet to be agreed. This certification shall serve primarily as a proof of quality for prospective students, students, parents and employers.

In administrative terms, it is of particular importance that there is no direct connection between a successful IQA and the state approval of study programmes. However, a successful IQA does guarantee that through its quality management system, the HEI can ensure that study programmes meet the required standards in terms of structure, design and subject content. Consequently, it renders an inspection of the degree structure and associated ministerial formalities unnecessary. A successful IQA justifies the confidence of the federal state in transferring the approval, amendment or withdrawal of the rights and obligations associated with degree programmes to the respective HEI, for example, by means of target agreements. The HEI shall then fulfil these tasks independently and shall inform the federal state of its decisions (this model has in any case already been implemented in the majority of federal states, albeit on the condition of accreditation, with the associated legal consequences).

The "Quality Label" awarded for a successful IQA can also serve as an instrument in the competition to attract new students since it testifies to the high quality of teaching and learning and to effective and ongoing improvement processes.

4. Areas of focus for Institutional Quality Audits (IQAs)

An IQA is based exclusively on the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG), which represent the standards for internal and external quality assurance throughout Europe. IQAs are conducted according to the internationally recognised evaluation principles (Self-reporting – Peer Review – Report with Recommendations – Follow-up Measures). In so doing, the IQA puts the European agreements into practice, supports the establishment of the European Higher Education Area, promotes student mobility and facilitates processes of recognition.

The ESG provide the framework for the requirements for quality in studying and quality assurance at HEIs:

  •" the interests of students as well as employers and the society more generally in good quality higher education;

  • the central importance of institutional autonomy, tempered by a recognition that this brings with it heavy responsibilities;

  • the need for external quality assurance to be fit for its purpose and to place only an appropriate and necessary burden on institutions for the achievement of its objectives."[3]

----

3) European Association for Quality Assurance in Higher Education (ENQA), (2009, 3rd ed.): Standards and Guidelines for Quality Assurance in the European Higher Education Area, p. 10f.

In addition to these ESG principles, the first part, "European standards and guidelines for internal quality assurance within higher education institutions" is of most significance for the IQA. This is reflected in the touchstones of the IQA.[4]

- Guidelines on quality (ESG I, 1)

- Quality of performance (ESG I,2)

- Conditions for student learning (ESG I,3, I,5)

- Quality of the teaching staff (ESG I,4)

- Information and communications policy (ESG I,6, I,7).

Although the IQA follows the first part of the ESG in all its breadth and depth, the "Guidelines" appended to the "Standards", on which the IQA's areas of focus are based, are not to be regarded merely as detailed checklists. This would contradict the nature of both the ESG and the IQA: the IQA assesses the quality management system and its impact but does not examine its results in detail.

Assessment as part of the IQA is not based exclusively on inspecting the documents related to individual procedures and processes. The HEI management and the individual faculties and departments at the HEI are responsible for presenting a self-evaluation report to the experts that plausibly and credibly demonstrates the way in which their quality management works and, indeed, confirmation that it does work. The primary tool for assessment is the quality management handbook, which outlines and explains the required processes. It documents how the HEI, with its faculties and departments, approach the design of ist

----

4) European Association for Quality Assurance in Higher Education (ENQA), (2009, 3rd ed.):
Standards and Guidelines for Quality Assurance in the European Higher Education Area, Part 1

study programmes and how both internal and external frames of reference are taken into account. However, similar to the ESG, it is not prescriptive, but allows freedom in the particular requirements of each subject and for innovative ideas. To assess the quality management handbook, interviews are carried out in the HEI's core areas and at the interface to faculties and departments.

5. Agents

The entirely new design of external quality assurance through an IQA compared to accreditation also changes the roles of the agents in the system. An institution that coordinates the processes at national level is, therefore, indispensable.

   - The **auditors** form a core group, which may be complemented by additional persons depending on the size and organisation of the HEI. The core group consists of three managers at HEI, faculty or department level, one expert academic, one student with experience in university self-administration and one labour market representative. Depending on the size and organisation of the HEI, additional representatives from different academic fields and, where necessary, from professional bodies may also be included in the group. The peer group will comprise at least six people and may be appropriately expanded where needed.

The auditors will have experience in a variety of backgrounds, whereby experience in quality management is indispensable. At least one auditor will be from abroad. They will be thoroughly prepared for their tasks by the Quality Council; among the most important topics will be the objectives of the IQA, the role of the auditors, interview techniques and guidance on how to steer discussions, methods of analysing the materials and guidelines on how to compile the audit report.

- **"Foundation for the Accreditation of Study Programmes in Germany" (Accreditation Council) – "Quality Council"**

In its current form, the "Foundation for the Accreditation of Study Programmes in Germany" is unable to fulfil the tasks related to conducting IQAs reasonably and efficiently, due to its organisational structure and current staffing. It must, therefore, be radically restructured, strengthened by an administrative agreement and be given sufficient funding to carry out its new tasks. The core of this "Quality Council" consists of a forum of experts from higher education and science and succeeds the Accreditation Council as the new, central institution for promoting quality at HEIs. Each member will be able to demonstrate their expertise and experience in quality management at HEIs and will be nominated by mutual consent by the HRK, the German Council of Science and Humanities, the KMK and external stakeholders on the Advisory Board. This will greatly increase the representation of HEIs on the "Quality Council" compared with the current Accreditation Council.

The Advisory Board, which will succeed the current Foundation Council, shall represent the stakeholders (HEIs, students, representatives of employers and employees, federal states, international experts). It will be possible to establish regional subdivisions for the operative business of the "Quality Council", in order to avoid capacity bottlenecks and any undesired effects of centralisation.

The **"Quality Council"** shall be responsible for coordinating and monitoring the entire system. Its tasks will include:

- deciding on the awarding of the "Quality Label";

- managing the pool of auditors;

- assembling peer groups;

- directly preparing the peers for the auditing processes;

14

- **(Accreditation) Agencies**

Agencies currently involved in accreditation will be given the role of consultants that may, if desired, provide HEIs with support and advice in improving quality and in the auditing process. They may also support HEIs in improving the quality of individual study programmes or awarding accreditation to individual study programmes. The agencies can prepare the experts for conducting audits in terms of content.

For the purpose of realising the European Higher Education Area, any agency that has been included in the European Quality Assurance Register (EQAR) may work for German HEIs.

6. Institutional Quality Audit (IQA) procedure

The IQA and any recommendations for improvement resulting from it are based on a self-evaluation report prepared by the HEI which includes the quality management handbook (see Section 7). The report describes the HEI's vision and mission, namely its objectives regarding quality and quality management (with particular regard to the application of quality management where quality standards are not met) in the area of teaching and learning in conjunction with research and administration. The self-evaluation report shall include the different representative groups within the HEI and take into account the various perspectives of the representative groups within the peer group. The institution's self-evaluation report shall be complemented with equivalent reports from the faculties and departments.

The HEI's self-evaluation report shall not exceed a maximum of 15 to 20 pages. Should any documents other than the quality management handbook be required for assessment, the group of auditors shall be allowed to view them either at the place where they are stored or online.

The HEI will arrange for the IQA to be conducted with the central institution, the Quality Council. Using the expert profile provided

by the HEI, the Quality Council will suggest a group of auditors. The HEI has the right to object to any conflict of interest on the part of the auditors.

The auditors will spend several days at the HEI. During their visit, the core group for teaching and assessment will interview the HEI management and deans, with every representative group, administration and other service facilities. These interviews will focus on the quality management system in terms of principles, its broad impact and the basic procedures that are intended to ensure that the HEI achieves its self-defined objectives.

When conducting interviews at the faculties or departments, the core group may be represented by some of their individual members and may be complemented by academic specialists or, in the case of the regulated professions, by their representatives. The acceptance by the agents involved is crucial for the effectiveness of the quality management in teaching and learning, and, consequently, this will be one of the core topics in the interviews at the faculties and departments. A sample of the key documents will also be assessed on the premises and an examination of how well national standards are being met will be made through the inspection of individual study programmes.

The group of auditors will then write a report of their visit to the HEI that will evaluate the plausibility and credibility of the principles, the processes, the impact of quality management in terms of its breadth and depth with regard to the HEI's objectives and how well national standards are being met. The report shall be based on the quality management handbook, the results of the interviews and a sample of documents at central and decentralised level. The improvement-oriented report should indicate strengths and examples of good practice, and should contain suggestions for improvement in less well-developed areas.

The auditors will evaluate the performance of the quality management system of the institution and assess how well it fulfils the requirements of each area of the IQA on a scale of one to four (absent - emerging - well-developed – very advanced). The quality management of the HEI must be rated "well-developed" in order to achieve a positive evaluation.

It is important for an HEI's quality development processes that the auditors' report to the HEI, faculties and departments provides specific advice on any potential for optimisation. This enables the HEI to benefit from the IQA even without achieving a positive overall result.

7. The Quality Management Handbook

A central component of the IQA is the assessment of the quality management handbook. It serves three purposes:

1. The handbook presents the HEI's quality management strategy clearly, comprehensibly and concisely for an external audience;

2. It describes the structures and processes in teaching and learning that are relevant for quality;

3. It indicates sources of further information that may be helpful for developing quality in teaching and learning.

The handbook is as such not only a source of information regarding the HEI's quality philosophy and responsibility structures for prospective and current students, parents, potential employers, and politicians, it also provides guidelines for the HEI's members and committees on designing study programmes.

The handbook is continually updated and modified to meet any new requirements.