The Quality Assurance System for Higher Education at European and National Level

Bologna Seminar
Berlin, 15 and 16 February 2007

Beiträge zur Hochschulpolitik 13/2007

Kultusminister KONFERENZ

Bundesministerium
für Bildung
und Forschung

Diese Publikation dokumentiert das vom Projekt Qualitätsmanagement der Hochschulrektorenkonferenz organisierte Bologna-Seminar "The Quality Assurance System for Higher Education at European and National Level", das am 15. und 16. Februar 2007 in Berlin stattfand.

This publication is a documentation of the Bologna-Seminar "The Quality Assurance System for Higher Education at European and National Level", organised by the Quality Management Project of the German Rectors' Conference, held in February 2007 in Berlin.

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1. Welcome Addresses

1.1. Christoph Ehrenberg
Ministerialdirigent, Federal Ministry of Education and Research

Ladies and Gentlemen,
I would like to welcome you to the seminar "The Quality Assurance System for Higher Education at European and National Level". I am pleased about three things:

- firstly, that I have the honour to open this Bologna Seminar,
- secondly, that almost 200 participants from government departments, universities and accreditation organisations as well as from the social partners and international organisations have come to Berlin specifically for this seminar, two thirds of them from abroad,
- and thirdly, that we are not just meeting here because the Bologna Process is important and because Berlin is an interesting city! At the end of the meeting we plan to have concrete recommendations for the conference in London in May. In London, we will critically review the development regarding the recognition of qualifications, the changes in study structures and in quality assurance. Under the co-chair of Great Britain and Germany, the next steps for the realisation of the European Higher Education Area can be defined at the conference in London.

Ladies and Gentlemen,
The London Conference and our meeting today are milestones of the German Council Presidency. In the field of education, we chose the motto "Education Unites" for this Presidency, and are thus taking up one of the leitmotifs of a great European, Jean Monnet:

"We do not build coalitions of states. We unite people."

The sum total of individual opportunities in the life of European citizens decides on the competitiveness of European industry, social cohesion and not least on whether Member States grow together on the basis of a common understanding of democracy, the rule of law and values. Education plays an important role. It facilitates an understanding of others on the basis of a consolidated identity; it builds bridges and brings people and cultures closer together.

At the beginning of this year, Germany – in addition to European responsibility – has also assumed particular international responsibility: Besides holding the G8 presidency, Germany also holds the chair of the Bologna Process. We – and I mean all 45 countries in the Bologna Process – are facing a double task:

- We must mobilise forces for the final spurt to the creation of a joint European Higher Education Area in 2010. 2010 – that is, more or less, tomorrow!
- At the same time, we will have to develop ideas for how to continue cooperation between the Bologna states beyond 2010.

Let's take a closer look at the past: What has happened in Germany since the last Bologna conference? We have been particularly successful in introducing the two-cycle study structure:

- The German institutions of higher education have largely implemented the "European Standards and Guidelines for Quality Assurance in Higher Education" and established quality assurance systems for higher education.
- Germany is in a good position regarding quality assurance. However, there is still a need for action, for example in internal quality assurance or regarding the question of how to deal with programme and process accreditation in future. In this national process, our institutions of higher education are playing a decisive role since they themselves decide on their quality management (higher education autonomy).
- Greater autonomy of the institutions of higher education is linked to an obligation for accountability.

- Furthermore, external certification is necessary which lives up to the quality management used by institutions of higher education or builds on it (compatibility of criteria).

Nevertheless, much remains to be done until 2010, also in Germany. But we are on the right way. From my point of view, three criteria seem most important:
- diversity,
- transparency, and
- quality.

Bologna does not aim at a single Europe-wide project but at diversity as Europe's strength. As a prerequisite for our future, quality must be the main criterion everywhere. Quality assurance and quality development must be the central tasks for institutions of higher education.

The accreditation of study courses plays an important role. In Germany, we have discussed this extensively and tested it in a pilot project. Both have shown that there are good prospects of successfully developing our present system further. So far, individual study courses are accredited. The future objective is a true quality management of an entire institution of higher education. Accreditation should then aim more at supporting the management of the higher education institution and the departments in their efforts for effective quality management.

The accreditation agencies are playing an important role in this process. This is reflected in our efforts to create a "European Register for Quality Assurance Agencies". The Register can:

- promote student mobility as it strengthens people's confidence in higher education and encourages the mutual recognition of degrees in the Bologna states;
- contribute to inspiring confidence in the agencies of the Bologna states and thus to reducing fears of an excessive accreditation bureaucracy;
- serve as a basis for the selection of an accreditation agency across national borders, thus promoting the establishment of a European Higher Education area;

- and last but not least, the Register can contribute to improving the quality of quality assurance agencies both nationally and throughout the Bologna states by promoting competition between the agencies as well as mutual confidence.

We want to intensify cooperation between nationally recognised agencies. What we want is coherence, not standardisation, of the accreditation agencies.

In this context, we need to consider in detail how national and international quality assurance systems can interact in an optimal way. Therefore we will take a close look at the quality assurance systems of different countries during this conference. I believe and hope that this will provide us with ideas for how to link national and international aspects in the best possible way.

Ladies and Gentlemen,
German and European institutions of higher education find themselves in an international competition in which we can only succeed on the basis of excellence and clear profiles. We need excellence in research and in teaching. That is a prerequisite for excellently trained students.

At the same time, the structural change of European economies is gathering speed. It brings about a growing demand for university graduates on the labour market. This also means that we need exchanges of European students, graduates and researchers, but we must also be attractive for young researchers from outside Europe.

Encouraging student mobility is an independent objective in education and science policy. We need considerably more university graduates who have spent some time abroad since excellent training does not only take place at home. Industry, science and politics need experts with European and international experience and background. Promoting mobility and the recognition of credits earned abroad are therefore one of the leitmotifs of the Bologna Process.

On the one hand, we must campaign for studies and science in Europe even more, on the other hand we must also establish the necessary framework conditions – at national and European level.

An attractive research environment, good working conditions for researchers and for their families, and appealing professional and private prospects will bring back to Europe more qualified European researchers who went abroad.

Politicians can launch ambitious international projects such as the Bologna Process, but these projects can only become a success story if they are supported and promoted by the stakeholders. On this note, I would like to thank you for participating in this conference and hope that we will have intensive discussions and fruitful cooperation in order to realise and develop the Bologna Process further. In conclusion, I would like to wish you an interesting seminar, which – and now I am quoting George Bernard Shaw – you should leave with at least one new idea: "If you have an apple and I have an apple and we exchange these apples – then you and I will still each have one apple. But if you have an idea and I have an idea and we exchange these ideas, then each of us will have two ideas."

1.2. Dr Josef Lange
State Secretary, Lower Saxony Ministry of Science and Culture

State Secretary Thielen,
President Wintermantel,
Ladies and Gentlemen,
Bologna seminars form a permanent feature of activities necessary to prepare ministerial conferences. These seminars provide opportunities to evaluate the interim results of the Bologna Process and to work on developing joint ideas about the European Higher Education Area. In preparing the conferences of ministers, they also serve to raise public awareness of selected aspects of the Bologna Process, to reflect international experiences in the implementation of both long-term and interim objectives and also draw attention to national characteristics. At the same time, they motivate all stakeholders to report on the highly complex and demanding obligations to which the Bologna signatory states committed themselves in order to realise the European Higher Education Area.

As representative of the *Länder* in the Federal Republic of Germany, I am very pleased to welcome you to this seminar in Berlin dedicated to aspects of quality assurance. There is no doubt: quality assurance is one of the key elements of the Bologna Process. Without the certainty that the Bologna states create not only the structural prerequisites for compatible and transparent study structures but also assure the quality of the study courses, there would be very little cross-border recognition of academic performance and higher education degrees without comprehensive and detailed checks. This mutual recognition facilitates student mobility immensely. And this recognition is encouraged if the responsibility for the quality of courses is initially perceived as a national and higher education institutions' responsibility oriented at standards agreed upon at international level.

On the other hand the issue of quality assurance demonstrates that the Bologna Process has to include the considerations and initiatives of other organisations and institutions. The discussed register of quality assurance agencies also concerns the European Union. OECD and the Council of

Europe have adopted recommendations for cross-border quality assurance. The comprehensive qualification framework the European Union is striving to achieve must be compatible with the qualification framework for the European Higher Education Area developed in the Bologna Process. The national quality assurance institutions are participants of an international network far beyond the Bologna Process area.

Quality assurance, to be discussed today and tomorrow, especially the role of national and European players in the quality assurance process - that means agencies, higher education institutions, provinces or Federal States and the federal government in Federations - is one of the key questions. And I suppose we expect different answers depending on how the Bologna states structure their national quality assurance systems.

As you know, the accreditation of study courses is a central element in quality assurance in Germany. The accreditation system was developed in cooperation between the institutions of higher education and the Federal States as well as the Federal Government. In the federal system of Germany, accreditation was and is the responsibility of the *Länder.* Despite all criticism regarding the financial and personal costs of the procedure and the efforts associated with course accreditation in higher education institutions and accreditation agencies, especially for the peers, accreditation in Germany has proven itself as successful: this is the conclusion of the National Bologna Report 2007. The central accreditation body in Germany, the Accreditation Council, was converted into a foundation under public law in Bonn at the beginning of 2005. The accreditation of courses is regulated consistently for all higher education institutions in Germany via *Länder* laws on higher education, resolutions and recommendations by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and relevant resolutions of the Accreditation Council.

The accreditation procedures are based on the European Standards and Guidelines (ESG). With resolutions adopted between December 2005 and June 2006, the Accreditation Council revised all basic procedures, rules and accreditation criteria. Approved agencies are bound by the rules of the Accreditation Council to observe the ESG.

In the beginning of the last winter term 45% of all around 11.500 courses in German higher education institutions started as Bachelor and Master courses, among them 70% of all courses at Fachhochschulen (universities of applied sciences) and 39% at universities. One third of these courses have been accredited.

Therefore a discussion has started how to develop our quality assurance system. One aspect discussed is to strengthen the role and the responsibility of higher education institutions in the quality assurance process. Quality assurance is the main task of higher education institutions themselves. Nevertheless it is said in our constitution that the education system is under responsibility of the state. As the higher education system in Germany is a state founded, state organised and state financed higher education system – in the around 20% private institutions in Germany only 2% of all students in Germany are enrolled – the state, and that means after the reform of federalism in 2006: the federal states are responsible for guaranteeing the quality of institutions and courses. That is the reason for discussions on introducing the possibility of system accreditation or process accreditation in supplementing programme accreditation. The object of accreditation will no longer be the individual study course but the quality assurance and improvement management of a higher education institution as a whole. A pilot project with four higher education institutions has been concluded successfully as a proof of principle at the end of 2006.

Higher education is a public good and a public responsibility – to quote the communiqué of the first follow-up meeting of ministers in Prague in May 2001. Underlining this, the *Länder* in the Federal Republic of Germany are convinced that, despite the increasing autonomy of higher education institutions and despite quality assurance by means of competition and delegation of accreditation to agencies, the state

remains responsible for higher education institutions and their study courses, at least in state financed and also in state acknowledged higher education institutions. The state remains responsible for ensuring quality of courses and degrees as well as mobility of students and graduates – at least by ensuring appropriate procedures of accreditation processes.

This includes accreditation by other than national quality assurance institutions or agencies. However, their procedures and standards have to take account of national requirements within the Bologna Process. This is the reason why there are reservations in Germany about regarding accreditation as a for profit service offered on a global education market.

In the Berlin communiqué of September 2003, the member states of the Bologna Process agreed upon the European Higher Education Area being a contribution to make Europe "the most competitive and dynamic knowledge-based economy in the world, capable of sustainable economic growth with more and better jobs and greater social cohesion". This requires taking responsibility for the quality of education provided in higher-education and employment systems.

I wish you and us fruitful discussions and future oriented results in this seminar. On behalf or the *Länder* in Germany: welcome again in Berlin.

1.3. Professor Dr Margret Wintermantel
President of the German Rectors' Conference

Ministerialdirigent Ehrenberg,
State Secretary Lange,
Ladies, Gentlemen, dear colleagues,
It is my pleasure to welcome you on behalf of the German Rectors'
Conference to the Seminar "The Quality Assurance systems in Higher
Education on European and national level" here in Berlin.

We all remember that 10 years ago the name Bologna strictly referred to
Europe's oldest university and a beautiful historic city. Nowadays, the
name Bologna immediately evokes the date 2010 and the imagination of
a tremendous goal: the approach of a common Higher Education Area
characterised by transparency and comparable degrees, common
European standards and worldwide competitiveness. The participation of
meanwhile 45 partner countries from in- and outside the European Union
underlines the persistent will to pave the way for the mutual recognition
of degrees, for student and staff mobility and a high level of quality in
the field of Higher Education.

Today's universities have been granted more autonomy by the public
authorities in recent years. This plus of autonomy is welcomed by
institutions, but goes hand in hand with enlarged responsibility and
accountability. With this in mind, the message after the Bergen
Conference is clear: We must keep an eye on the quality assurance
instruments in order to create comparability and compatibility in the
education systems across national borders. The amount of reflection in
this process, however, is enormous. And whether we like it or not, Quality
Assurance is one of the major tools for achieving the goals of the
Bologna Process. It will not only facilitate the mutual recognition of
degrees and therefore increase the students' and teachers' mobility, but
also enhance the comparability of degrees and the chances of
employability due to more transparency in the study contents.

Taking a closer look, we do have to recognise that all signatory countries have found and will continue to find their own approach towards the implementation of the "European Standards and Guidelines" passed in Bergen. We have a wide variety of models for the implementation – and obviously these variations are fruitful. In the United Kingdom, for example, institutional Quality Audits are the method of choice whereas in Germany the quality assessment of study programmes is the established course of action.

It should not be overlooked that the already existing heterogeneity of models and approaches will undoubtedly increase in the future. As of today, Sweden gives both models a chance to stand the test of reality. Other countries are still busy building up their own national quality assurance system. The "European Standards and Guidelines" - this we have to keep in mind – are the foundation for our common efforts and open the door for broad international recognition of European degrees and interinstitutional cooperation, for example in the form of joint degrees. The fact that the German Rectors' Conference has published a German translation of the "ESG" proves the great importance the HRK attaches to the "European Standards and Guidelines".

In order to create more transparency and international cooperation the "E4" group consisting of representatives of universities (EUA), other HE institutions (EURASHE), students (ESIB) and ENQA has published a report about the possible creation of a European Register of quality assurance agencies. I am sure we will have a lively discussion about this topic tomorrow as the question of how such a register can serve as a source of information for the recruitment of reliable agencies highly impacts the further development of the international academic landscape. In the end we will have to answer the question about the added value of our joint efforts.

Additionally, questions of the distribution and balance of competencies as well as of subsidiarity between institutional and national levels on the one hand and between natioiial and European level on the other hand need to be addressed in this context.

Dear colleagues, the seminar you are attending here today and tomorrow serves as one step towards the upcoming ministerial conference in London in May. First of all we will hear of the endeavours of the signatory countries to implement the "European Standards and Guidelines for Quality Assurance" and draw some conclusions concerning the connection of the national and the European level. Secondly, we will explore how the growing importance of the European Standards and Guidelines for Quality Assurance creates new challenges for the future of European higher education. Thirdly, we will try to put our ideas and thoughts down in words as recommendations for the Ministers in London. However, facing the large number of participants today and the fact that some of the finest experts are gathered here to guide our efforts I do not doubt that we will succeed in this task – just as much as I do not doubt the significance of our subject.

From the very start, the Bologna Process has been characterised by the strong self-commitment of the partners involved – governments, universities, institutions, students, international organisations. That you have travelled to Berlin to attend to our seminar today and tomorrow surely is a promising sign for the significance of that long-standing commitment. Interpreting these signs – and hopefully being correct in doing so – it is my great pleasure to offer you the opportunity for an extensive update on "The Quality Assurance system in European Higher Education".

Speakers and participants from all over Europe will offer us a variety of models and approaches. In many countries the agreements and the allocation of accountability and autonomy between universities on the one hand and ministries as well as quality assurance agencies and institutions on the other, led to diverse and sometimes difficult debates. Therefore not only today, but also in the workshops tomorrow, we will have the chance to gain insights into the recent developments on the national level in some selected countries. The stakeholders will sum up these experiences and reflect upon them from their particular perspective in the afternoon.

During tomorrow's workshops tangible results and practical proposals for the enhancement of the "Standards and Guidelines" shall be outlined and will be discussed in the final session, together with the recommendations for the London communiqué.

This seminar was organised by The Quality Management Project of the German Rectors' Conference and financed by the German Ministry for Education and Science and the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany KMK. Therefore, I would like to take the chance to thank the Ministry and the KMK for their kind support. Furthermore I want to express my gratitude to our speakers for their willingness to share their expertise with us and to all of you for coming and sharing your knowledge and your views on a topic that – as the Berlin communiqué has it – "has proven to be at the heart of the setting up of a European Higher Education Area".

I wish you all a lot of interesting and challenging discussions and an inspiring and fruitful seminar!

2. Plenary sessions

2.1.   The Cornerstones of Quality Assurance at the European Level

Ian McKenna
Higher Education and Training Awards Council (HETAC)

"It is not the strongest species that survives, not the most intelligent, but the ones most responsive to change." – Charles Darwin

Introduction

I was struck by the title of the presentation – I like the notion of construction and of many parties collaborating to build a shared vision. Cornerstones are in essence the foundation stones which will support further constructions. One could continue with this image and note how the process is supervised by a Project Leader whose specific task is to ensure that all participants are clear on their roles, material is delivered on time and that the project is completed on time and to the satisfaction of those commissioning and paying for the construction. I should stop there, as I am now surfacing issues such as ownership and policy leaders within the Bologna Process.

During the course of researching for this presentation, I also came across an alternative title which I have to credit to Peter Williams, President of ENQA – So, how are we getting on? Such a title would suit the Irish approach – discursive, at times long-winded but genuine in our attempts to realise the vision. I often think many take a similar view of the Bologna Process – we will get there in the end, but we have to work very hard at it. It is not as though we will all wake up in a magical land called the European Higher Education Area where each of the 10 action lines will have been implemented consistently throughout all 45 participating members. Needless to say, this is slightly removed from reality. As one who was deeply involved in the first stocktaking report on the Bologna Process, I do not think that I will shatter any illusions by saying that this project will not finish by 1st January or indeed, 31st December 2010. This,

however, should not depress us – there is much to acknowledge. The fact that 45 participating countries, along with key stakeholders are pushing forward a series of reforms on a dynamic and voluntary basis reform is remarkable in itself. Leaders in higher education institutions have embraced to varying degrees the Bologna agenda and are leading their institutions through reform programmes. I also think it is noteworthy that a quiet revolution has taken place – common approaches and understandings are emerging and this is very evident in quality assurance.

This paper explores the evolution of quality assurance in the Bologna context. It will also identify external influences which will assist its construction, but also run the risk of compromising the voluntary dynamic associated with the Bologna Process. Finally, some thoughts are offered on the value of the common standards articulated by ENQA in assisting participating members to embed quality assurance in higher education.

Where have We Come From?
When we look at the Sorbonne Joint Declaration of May 1998, the Ministers of France, Germany, Italy and the United Kingdom, there was no reference to quality assurance. Notwithstanding this, the document remains critical to the shaping of the Bologna Process – some of the key objectives were established. The concepts of mobility, recognition of qualifications, emergence of two-cycles, impact of the ever changing landscape in higher education and the need to collaborate were articulated and in effect, the future agenda was set. As we know, the following year in Bologna, these four countries were joined by 25 other European countries, which resulted in the Bologna Declaration. We now see reference to quality assurance – it spoke of the promotion of European co-operation in quality assurance "with a view to developing comparable criteria and methodologies.[1]" Needless to say, there was no explanation of precisely what this means.

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[1] Joint Declaration of the European Ministers of Education, Bologna 19th June 1999.

Two years later in Prague, the Ministers provided to a certain degree the clarity required to facilitate progress in this area. They noted the critical role played by quality assurance in facilitating the pursuit of high standards, and the promotion of comparability of qualifications across Europe. More importantly, there was recognition of the role to be played by key stakeholders in this area – universities, other higher education institutions national agencies and ENQA, and Ministers urged that they collaborate in the establishment of "a common framework of reference.[2]"

For me, the Berlin communiqué was seminal for a number of reasons. It has, I believe, set the tone for participating members in the Bologna Process. On previous occasions, I have spoken about "Bologna Lethargy". Now, Ministers wanted action and evidence of the impact of the process. In other words, the process is not just about a Ministerial high level meeting every two years, littered with a series of meetings in between.

In the Communiqué[3], the Ministers envisioned that quality assurance systems would include:
- A definition of the responsibilities of the bodies and institutions involved;
- Evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results;
- A system of accreditation, certification or comparable procedures;
- International participation, co-operation and networking.

Again, there is a very explicit recognition of the central role of higher education institutions, in line with the principle of institutional autonomy, which "provides the basis for real accountability of the academic system within the national quality framework." Also, reflecting the mature evolution of ENQA, it was charged with responsibility "to develop an agreed set of standards, procedures and guidelines on quality assurance,

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[2] Prague Communiqué, "Towards the European Higher Education Area", Prague, 19th May 2001.
[3] Berlin Communiqué "Realising the European Higher Education Area", Berlin, 19th September 2003.

to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Follow-up Group to Ministers in 2005."

In Bergen in 2005, Ministers adopted the standards promulgated by ENQA, and accepted the principle of peer review of quality assurance agencies on a national basis.[4] Whilst accepting the concept of a European Register of Quality Assurance, it called for further development work on the "practicalities of implementation". The Ministers also noted that almost all countries have made provision for a quality assurance system based on the Berlin Communiqué.

And so, Where Are We?
It is fair to say that all of us have been exercised by the ENQA standards. The Bologna Process Stocktaking Report[5] noted that even in 2005, more than half of the participating countries had quality assurance procedures in place, based on the key elements identified in the Berlin Communiqué. However, it did also raise concern on two levels. In the first instance, it referred to the weakness of systems when it came to student involvement and while a number of institutions may remark on the difficulty of securing student participation, it behoves all of us to recognise the important contribution they can offer in this area.

However, the report reminded us all not to lose sight of the true objective of this movement, and highlighted the risk of us blindly assuming that progress on the adoption of common quality assurance is the end result – clearly, it is not. It stated: "The ultimate success of this objective relies on the willingness of institutions, their staff and their students to embrace systematic quality assurance as central to their respective roles in the delivery of higher education."

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[4] Bergen Communiqué "The European Higher Education Area – Achieving the Goals", Bergen, 20th May 2005.
[5] http://www.dfes.gov.uk/bologna/uploads/documents/BPStocktaking9May2005.pdf

The message mirrors a similar message in Trends IV Report[6] which noted: "…it was felt that improvements in quality had not been considered strategically or in central policy-making, but has rather been dominated by structural discussions concerning course units to offer at what level".

In this respect, it may be that the optimism of the Bergen Stocktaking has masked a serious dilemma or struggle within the Bologna Process – the extent to which a voluntary movement of 45 diverse participating members can genuinely achieve the desired result within the timescales required.

What are the Key Influences in this Direction?

I have previously alluded to some of the key drivers which are determining our commitment to the construction of a genuine quality movement – the communiqués have advanced the impact of quality assurance in terms of mobility and improving the prospects of recognition of qualifications. I would also cite the key influence of the EU Commission. As far back as 1998, there was a Council Recommendation[7] on quality assurance in higher education, which cited key economic influences on the development of transparent and comparable quality assurance systems. Whilst recognising national competency in higher education, it emphasised the challenges facing higher education institutions in addressing the "education and social requirements of a world-wide 'knowledge society' and the resulting developments"[8]. The increased massification of higher education and the desire to promote mobility in the context of the research programmes were also cited. The Recommendation could be described as the "velvet touch" – the elaboration of a series of features which should be central to the development of quality assurance in European higher education institutions, with strong political support from the European Council.

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[6] "Trends IV: European Universities Implementing Bologna", EUA Publication April 2005.
[7] Council Recommendation (98/561/EC), 24th September 1998.
[8] ibid.

The 1998 recommendation was followed up in 2006. The new recommendation acknowledged the solid progress made. Citing the Lisbon strategy, it encouraged its members to move quickly on the adoption of the standards promoted by ENQA in the context of the Bologna Process and called for the establishment of the European Register, which in the first instance, would underpin the national quality assurance process, but also more controversially, "enable higher education institutions active within their territory to choose among quality assurance or accreditation agencies in the European Register and agency that meets their needs and profile"[9]. This is now signalling a transnationality in quality assurance, which may well be a trend for the future.

What Else Drives Us?
The need for moving to certain standards comes through in other ways. The most notable of these is the Qualifications Framework movement. This has been gathering momentum, in particular since the Bergen Communiqué. Two countries – Ireland and Scotland – have participated in a pilot project, in which the national frameworks are mapped onto the overarching framework for the European Higher Education Area – the so-called Bologna Framework. Given the vanguard nature of the exercise, quite an amount of thought was given to the rigour and nature of the criteria which would determine the verification process. All participants in this exercise emphasised the need to factor quality assurance systems into their deliberations. Accordingly, one criteria was set for verification to be that national systems for higher education must be consistent with the quality assurance standards articulated in the Berlin Communiqué.

Similarly, quality assurance is playing a role in the framework discussions at EU level. In advancing the case for its introduction, the EU Commission noted that "Europe is characterised by a great diversity of education and training institutions and systems. This mirrors a widespread and strong consensus that education and training should reflect and respond to learning needs at local, regional and national level."[10] It continued "A

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[9] ibid.
[10] Recommendation of the European Parliament and of the Council on the Establishment of

situation where education and training systems and institutions operate in isolation from each other could lead to fragmentation and hinder rather enable citizens to develop their knowledge, skills and competences." The proposal argues that inherent in the proposed 'filter' or EQF is an explicit commitment to quality assurance.

What's Happening on the Ground?

Moving from the international level, we must recognise the centrality of higher education institutions. Both the Berlin and Bergen Communiqués quite rightly recognised that the primary responsibility for quality assurance rested with the higher education institutions themselves. Again, we can rely on the ENQA standards as a source of guidance. However, this is perhaps one of the main battlegrounds of quality assurance, and as previously noted in its Trends IV Report, the EUA acknowledged this challenge. It emphasised the need for the discussion to move from the process to genuine implementation.

This message is repeated in its Report on the Three Rounds of the Quality Culture Project 2002 – 2006[11]. While the report cites the need for financial support to promote quality within higher education institutions, it addresses the institutional leaders. The report noted "success factors for effectively embedding a quality culture include the capacity of the institutional leadership to provide room for grass-roots approach to quality (wide consultation and discussion) and to avoid the risk of over-bureaucraticisation." This is a theme I would like to return to.

What's Happening Elsewhere?

Clearly, within a short timeframe, it is impossible for me to do justice to global trends. The Bergen Communiqué recognised the need for the Bologna Process to look outward beyond its immediate remit. Julie Bishop, the Australian Minister for Education, Science and Training said

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the EQF for Lifelong Learning (5th September 2006)

[11] "Quality Culture in European Universities: A Bottom-up Approach", EUA Publications 2006.

that "The Bologna Process [...] is likely to influence developments in higher education in many parts of the world including our region"[12]. For example, my organisation HETAC is collaborating with ACQUIN and the Australian Universities Quality Association to reflect on the experience of external evaluations, with the ENQA standards serving as the benchmark. Minister Bishop is also mindful of the potential of the Asian countries to view European higher education institutions becoming more attractive as a location for their student body. In effect, there is a clear acknowledgement of the success of the Bologna Process and the vision it represents.

It is also worth noting the thrust of the recent Spelling Report[13] in the United States. The Commission Report refers to the crisis in the US higher education system, and its failings across a series of issues including access and participation, literacy amongst graduates and its tardiness in responding to the challenges which lie ahead for the US economy. It is possible to map many of its proposed responses onto the Bologna action lines. For example, it talks of, inter alia, the need to establish a workable credits system, increased transparency in qualifications, increased use of learning outcomes. In the midst of these, the Commission recommends that US higher education institutions "embrace a culture of continuous innovation and quality improvement"[14].

So, Pull the Threads Together
At the outset, I would propose that we celebrate where we are now. As far back as 1998, in Sorbonne, Ministers identified the importance of higher education, and the vitality it brings to European social, economic and cultural fabric. The Bologna Process has grown from 29 to 45 participating countries, each committed to the implementation of 10 action lines. This strength of this voluntary, dynamic structure is acknowledged, not only by the European political structures such as the EU Commission, but it is also acknowledged on the global stage. More importantly, the philosophy of quality assurance permeates throughout

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[12] The Bologna Process and Australia: Next Steps (DoEST, April 2006)
[13] "A Test of Leadership – Charting the Future of US Higher Education", Report of Commission appointed by Secretary of Education Margaret Spellings.
[14] ibid

this process. In this respect, we have laid the cornerstones for the "temple of quality assurance".

But do we generate risks in the construction of this temple? I fear we do for a number of reasons. Let me first refer to the famous European Register. We must heed the warning signs. Both the first Bologna Stocktaking and the Trends IV reports refer to the need to view the ENQA standards as just that – standards. They are part of a process, but not the end result. Since Bergen, the E4 Group has battled with the issue of the Register, and to my knowledge, while progress has been made, no decision has yet emerged from this forum. Whether it can be resolved in advance of London remains to be seen. If we were afforded the luxury of going back in time to 2003 or 2004, would we start here? I would ask the question "What is the added value?" and I sense this is missing from the debate. Perhaps, it would also be worth stepping back and asking what value does it bring to the learner, as they strive for their qualification. The Register may be perceived as either an endorsement of some kind or an information tool. The EU Commission see it as a means of encouraging competition. Is it not possible to fulfil these ambitions through other means without the creation of another layer of bureaucracy, potentially being the source of legal argument and conflict?

I spoke earlier on of the trust being built, and yet potentially, here we are creating the opposite. The fact is that it must be within the realm and imagination of quality assurance agencies, and indeed higher education institutions to build the required trust and exchanges without recourse to a register. As more agencies undergo an external quality assurance in line in ENQA membership requirements, and as more European higher education institutions engage in collaboration through joint degrees and research programmes, the mutuality, information and respect is being built. Is it not time to ask what more do we want, and is a new agency overseeing a European register the only way of solving it?

I would now like to look at the institutions. While for many of our institutional leaders, it is an exciting time of change, it is also an incredibly crowded agenda. Our institutions are being pulled in many

directions and being asked to respond to many policy demands. They are regularly challenged by sometimes competing demands. We must give our institutions space, but equally, leaders of higher education institutions must respect the right of those beyond the academic walls to input and shape their activity. I am loathe to think of Government and higher education institutions as two different sides, though often it appears so. Internal competition and rivalry distracts us all, whether within national boundaries or on the European stage. In Ireland, after many years of "loud speaker" talks, there is now more coherence and a sense of unity of mission. The fact is that Government and higher education institutions have responsibilities and are accountable. Both are accountable to the citizens and tax payers, many of whom will not see the inside of the institutions that their taxes fund. Quality assurance is a key element of the fulfilment of this accountability.

Finally, I will turn to ENQA – it has emerged as a key player in this arena, but I would urge two things. As the volume of reports increases, it is vital that each are treated consistently to build trust in its procedures. It would be preferable that each report is assessed by a consistent group of its Board. Secondly, we must all recognise that quality assurance is a journey for agencies and higher education institutions. We cannot stand still. Mechanisms must be built for review of the standards and the promotion of best practice. The risk in opting for minimum standards or the lowest common denominator is exactly that. Standards should represent a challenge for us all, irrespective of the age or history of institution or agency. We can no longer rely on reputation and history. Institutions are not about buildings, but about helping a diverse group of persons to fulfil ambitions. Such aspirations change, and organisations like ENQA have a duty to encourage and exhort similar change amongst its members, and ultimately, the higher education institutions.

Finally, let me finish with a quote from Winston Churchill:

"Every day you may make progress. Every step may be fruitful. Yet there will stretch out before you an ever-lengthening, ever-ascending, ever-improving path. You know you will never get to the end of the journey.

But this, so far from discouraging, only adds to the joy and glory of the climb".

Let us all continue the climb, let us keep a strong focus on the construction of the temple of genuine quality assurance and not become distracted by processes and bureaucracy.

2.2. From Transnational Co-operation to National Implementation

European politics of quality assurance and the introduction of the Standards and Guidelines for Quality Assurance in the European Higher Education Area

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The paper addresses the growing importance of quality assurance in the Bologna Process by focusing on how the Standards and Guidelines for Quality Assurance in the European Higher Education Area, adopted in 2005, affect higher education policies at the national level. Indeed, the adoption of the ESG introduced a significant change in quality assurance policies throughout Europe. This change could be qualified as a shift from transnational co-operation and co-ordination to the implementation of a policy-agenda at the national level: quality assurance in the European higher education area, irrespective of whether it is conducted by the institutions themselves or by the agencies, shall be based on the same principles.

By addressing recent developments in Sweden, the United Kingdom, Hungary and Germany, the study highlights the importance of the national setting, i.e. the national quality assurance policy and the legal framework, for the implementation of the ESG.

1. Quality Assurance in the Bologna Process

When the Ministers responsible for higher education met in May 2005 for the Bologna follow-up conference in Bergen and adopted the Standards and Guidelines for Quality Assurance in the European Higher Education Area (henceforth ESG)[1], it was clear that evaluation and accreditation would gain a growing importance in the realisation of a European higher education area. Indeed, the adoption of the ESG introduced a significant

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[1] ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki.

shift in European policies of quality assurance. This shift could be qualified as the transition from transnational co-operation and coordination to the implementation of a full-blooded policy-agenda at the national level.

Quality Assurance and National Politics

It is important to recall the national roots and development of quality assurance in order to understand its role in the Bologna Process.[2] Indeed, the search for appropriate methods for the systematic enhancement of quality at higher education institutions has been a key issue in political and scientific debates in most European countries for the last two decades. Moreover, it is likely that issues of quality assurance will remain at the top of the political and institutional agenda for the next decade.

The very reasons for the growing importance of quality assurance in higher education vary from country to country. Nevertheless, at least three international trends can be named for having substantial influence on the evolution of national quality assurance systems:
-    the emergence of obvious quality problems in the provision of higher education, due to the transition of universities and colleges to providers of mass higher education;
-    the growing financial constraints since the 1970s, inducing cost-cutting strategies in most public sectors;
-    the increasing pressure for accountability as a result of a deregulation process furthering the autonomy of the higher education institutions.

Especially the latter of these trends indicates that the establishment of quality assurance systems refers to much more than to technical exercises developed by higher education institutions for assuring the quality of their study programmes. Rather, evaluation and accreditation processes have been set up as part of a new steering strategy. According to the principles of the New Public Management introducing substantial

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[2] Harvey, L., and Green, R. (1993): Defining Quality. In: Assessment and Evaluation in Higher Education Vol. 18/No. 1.

administrative reforms in all public sectors since the 1970s[3], higher education institutions were given more autonomy and responsibilities. However, the independence from state regulation went hand in hand with the necessity to account for the quality (i.e. the effectiveness and efficiency) of their services.[4] Shortly after 1989, Western European evaluation methods and processes spread across former communist countries and accompanied the development of their small scale higher education sector to modern, differentiated and open systems of tertiary education.[5]

Apart from these developments that followed – although internationally shared – national agendas, a non-governmental actor tried to push through a higher education agenda very distinct from the national one. In 1994 the European Commission launched the project "Quality Assessment in the Field of Higher Education" focusing on the development of procedures and methods in external quality assurance.[6] In September 1998, the Council of the European Union approved a recommendation Concerning European Cooperation on Quality Assurance in Higher Education and proposed to establish a European Network of Quality Assurance Agencies (henceforth ENQA) in order to promote the exchange of expertise and enhance cooperation between national agencies.[7]

Although the quality assurance procedures varied (and currently still vary) from country to country, the EU project contributed to transmit some shared principles of quality assurance. These common principles are the foundation of a multi-stage approach: a self assessment acting as the first stage and an external peer review as the second. The third stage –

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[3] Lane, J. (2000): New Public Management. London.
[4] van Vught, F. (1994): Intrinsic and Extrinsic Aspects of Quality Assessment in Higher Education. In: Changing Contexts of Quality Assessment – Recent trends in Western European Higher Education (Westerhijden, D. et al. eds.). Utrecht.; Trow, M. (1996): Trust, Markets and Accountability in Higer Education. In: Higher Education Policy Vol. 9, pp. 309-324
[5] Tomusk, V. (2000): When East meets West: Decontextualizing the quality of East European higher education. In: Quality in Higher Education Vol.6/No. 3, pp. 176-185.
[6] European Commission (1995): European Pilot Project for the Evaluation of Quality in Higher Education. Brussels.
[7] EU Council 1998

the so-called "follow-up" – has increasingly become established as an obligatory part of the process.

In conclusion, quality assurance has to be considered as 1) an attempt to resolve quality problems and as 2) a steering instrument for (public) higher education.

Quality Assurance "from Bologna to Bergen"
Having recalled this, it seems surprising that quality assurance did not play a more influential role at the beginning of the Bologna Process. It was hardly mentioned when the ministers of 29 European countries signed the Bologna Declaration on June 19, 1999 and agreed to create a European Higher Education Area. During the follow-up conference of 2001 in Prague, the ministers restricted themselves to furthering international cooperation and experience-sharing in quality assurance among member states.[8] It was only two years later, at the Berlin conference in 2003, that quality assurance entered the "Top 3" of Bologna's reform agenda. The Ministers stated, "the quality of higher education has proven to be at the heart of the setting up of a European Higher Education Area. […] They also stress 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".[9]

The Ministers gave ENQA the mandate to develop – in collaboration with the European University Association (henceforth EUA), the European Association of Institutions in Higher Education (henceforth EURASHE) and the National Union of Students in Europe (henceforth ESIB) – "an agreed set of standards, procedures and guidelines on quality assurance" and to "explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies".[10]

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[8] Prague Communiqué (2001): Towards the European Higher Education Area. Communiqué of the meeting of European Ministers in charge of Higher Education. Prague.
[9] Berlin Communiqué (2003): Realising the European Higher Ecuation Area. Communiqué of the conference of Ministers in charge of Higher Education. Berlin, p. 3
[10] ibid.

A close inspection of the main outcomes of the 2005 Bologna follow-up conference in Bergen indicates that quality assurance not only beheld a prominent position on the European reform programme, but that a new stage of policy-making was reached.

The Ministers
- adopted the ESG applicable to all institutions, procedures and actors. Quality assurance in the European Higher Education Area, irrespective of whether it is conducted by the institutions themselves or by the agencies, shall be based on common principles. The shift from sharing national experiences to implementing European aims at the national level "will not only lead to more consistency and a better mutual understanding of quality assurance but […] will lead to a common understanding of, at least, principles of quality assurance"[11];
- welcomed the principle of a European register of quality assurance agencies. The second recommendation of the Ministers concerned the introduction of a register of quality assurance agencies. This register should list all certified agencies operating in Europe. Higher education institutions would be entitled to choose any service provider on this list. A standing committee of experts in quality assurance would administer the register. The second recommendation will be one of the critical issues to be debated in 2007 in London and might affect the national quality assurance systems to a very large extent if agencies are no longer contingent upon nation-state recognition;
- underlined "the importance of co-operation between nationally recognised agencies with a view to enhancing the mutual recognition of accreditation or quality assurance decisions".[12]

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[11] Hopbach, A. (2006): The European Standards and Guidelines and the Evaluation of Agencies in Germany. In: Quality in Higher Education. Vol. 12/No.3, pp. 235-242.
[12] Bergen Communiqué (2005): The European Higher Education Area – Achieving the Goals. Communiqué of the conferences of European Ministers in charge of Higher Education. Bergen, p. 3.

Until the Bergen conference, discussions about and development of quality assurance at the national and the European level were dominated by the leading role of national actors: Experiences on the national level affected the European discourse and understanding of quality assurance by sharing experience and promoting best practice. With the Bergen conference however, the national influence on the European reform debate changed. According to the Ministers, the ESG shall be adopted by the national actors, thereby introducing significant changes in the aims, the structure and the procedures of national quality assurance. Furthermore, Ministers added new aims and objectives of quality assurance to be implemented in the national systems of quality assurance. These objectives are related to broader political aims of the European reform process such as enhancing mobility. They signalise the adoption of Bologna's overall policy-making approach to quality assurance.

2. Implementing the European Standards and Guidelines Implementing Bologna

The national implementation of European politics and policies of quality assurance faces two substantial problems:

First of all, the dichotomy between the national interpretation of evaluation/accreditation as part of a new governance strategy in higher education on the one hand (some observers describe this process as a move from the "interventionary state" to the "facilitory" or "evaluative state"[13]), and the Bologna project to realise a European network of consumer protection on the other. Thus, there is a fundamental difference in the way the function of quality assurance is perceived and defined 1) at the national level and 2) at the European level, as outlined previously in this study.

Another problem is linked to the nature of the European policy process (i.e. its historical evolution, the generation of policy outcomes and its implementation). Bologna is not a 'traditional' Europeanisation-process

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[13] Neave, G. (1998): The Evaluative State Reconsidered. In: European Journal of Education Vol. 33/Nr. 3, pp. 265-284.

resulting in supranational institution-building and the delimitation of a new, supranational policy field. Rather, the Bologna-process is essentially intergovernmental: Although European stakeholders are involved in the drafting process of the policy-documentation, nation-states retain decision-making powers and an ultimate veto right. Furthermore, due to its intergovernmental structure, the Bologna-process/the Bologna Follow-Up Group does not dispose of any means to enforce national implementation of the European reform principles. Except for the newly established report- and benchmarking system, there is no possibility to identify and correct deviations in national implementation strategies. Following Francis Snyder, the Bologna Process can therefore be considered as soft law, i.e. as "rules of conduct, which, in principle, have no legally binding force but which nevertheless may have practical effects".[14]

What are the implications of these two problems on the implementation of the ESG in particular?
Since the beginning of the EHEA project, issues of recognition and comparability of learning outcomes nourished reflections on the organisation of a reliable and all-encompassing system of quality control. Recent European efforts in this direction entail the creation of European Standards and Guidelines of Quality Assurance in the European Higher Education Area.

Whereas Bologna focuses on the regulation of study structures throughout the European Higher Education Area (i.e. the introduction of diploma supplements and ECTS), the formal and qualitative equivalence of study contents are examined by nationally organised assessments. To assure the reliability and comparability of such assessments at a European scale, a common understanding of the methods and organisational aspects of quality assurance was needed. Hence, in May 2003, the European ministers mandated ENQA, EUA, EURASHE and ESIB to prepare a policy paper on European standards for evaluation and accreditation for the intergovernmental conference held in Bergen two

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[14] Snyder, F. (1994): Soft Law and Institutional Practice in the European Community. In: The Construction of Euope (Martin, S. ed.). Dordrecht.

years later. The standards and guidelines were ratified in 2005 and are now fed back into the national policies.

The ESG are composed of three parts:
- Part 1: European Standards and Guidelines for Internal Quality Assurance of Higher Education;
- Part 2: European Standards and Guidelines for External Quality Assurance of Higher Education;
- Part 3: European Standards and Guidelines for External Quality Assurance Agencies.

As previously stated, the guidelines apply to higher education institutions, agencies of quality assurance and policy-makers (i.e. the state). The ESG thus form an all-encompassing framework of reference for all stakeholders. The ESG are formulated in a very generic way in order to fit very diverse national settings. Let us focus on a detailed description of the ESG's content and focus instead on the fundamental principles of the policy-document:
- "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 in heavy responsibilities
- The need for external quality assurance to be fit for its purpose and to place an appropriate and necessary burden on institutions for the achievement of its objectives".[15]

Again, it should be highlighted that the standards reflect basic good practice in Europe as outlined in other policy documents as for instance INQAAHE's Guidelines of Good practice[16] or ECA's Code of Good Practice.[17][18] At the very core of the ENQA-project is the idea to further

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[15] ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki, p. 10
[16] INQAHEE (2005): Guidelines of Good Practice. Dublin.
[17] ECA (2004): Code of Good Practice.
[18] Aelterman, G. (2006): Sets of Standards for External Quality Assurances Agencies – A Comparison. In: Quality in Higher Education Vol. 12/No. 3, pp. 227-233.

institutional autonomy of both higher education institutions and quality assurance agencies.

Being a child of the Bologna Process, the ESG did not escape the European implementation dilemma. As their (legal) status remains highly unclear, the implementation strategies differ from one country to another. "The standards […] do not attempt to provide detailed guidance about what should be examined or how quality assurance activities should be conducted. Those are matters of national autonomy, although the exchange of information amongst agencies and authorities is already leading to the emergence of convergent elements".[19]

The implementation of the ESG thus depends on 1) the way the ESG cope with the national quality assurance policies and the priorities of its main actors, 2) the way the ESG fit into the legal setting in place and 3) the enforcement-possibilities at the supranational level.

In order to assess the implementation of the ESG in Sweden, the United Kingdom, Hungary and Germany, it is essential to 1) establish a clear distinction between the national interpretation, regulation, and evolution of quality assurance and 2) control for the permeability of the national setting to European quality assurance policies.

3. National Quality Assurance Systems: Policies and Regulations

3.1 Quality Assurance in Sweden
Compared to the high enrolment rate of school leavers in tertiary education, Sweden has a relatively small higher education sector composed of 39 higher education institutions, most of which are independent state agencies reporting directly to the government. This organisational status confers an important amount of autonomy to public institutions and can be considered as the result of an early deregulation process. The 1993 Higher Education Act gave universities the right to award all degrees including doctoral degrees, whereas the university

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[19] ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki, p. 14

colleges were only allowed to award the Bachelor's degree. "The University Act (together with the University Ordinance) replaced thousands of pages of national regulation".[20] The government's role then shifted from providing ex-ante regulations to checking the attainment of the institutions' goals.

The Swedish quality assurance agency Högskoleverket (henceforth HSV) has been established by governmental decree in 1995 in order to provide higher education steering with a central information and coordination platform (a role formerly attributed to an all-encompassing planning organ, the Office of the Chancellor).

Its duties include quality assessment and accreditation, supervision and research. The HSV is also responsible for higher educations statistics, evaluation of foreign education and provision of study information.

Legal Embeddedness of Quality Assurance and Quality Assurance Agencies

Swedish quality assurance policies and laws make a fundamental distinction between evaluation (i.e. institutional audit and programme evaluation) and accreditation, which is considered to be a form of certification or approval of the institution's/the programme's status. Any institution that wishes to award a degree which it is not eligible to award must apply to the HSV. This examination procedure has to be differentiated from the regular evaluation business of the agency. General legal regulations governing quality assurance activities are set out in the Higher Education Ordinance. In the Swedish political context, the government funds the agencies, defines their tasks, and appoints their directors. Decisions regarding the procedure, the stages of the processes and the outcomes are left to the agency. This is to say that the HSV owns the evaluation process. Hence, it can be considered as politically independent or formally independent with regard to methodology and decision-making. Critics in academia remain

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[20] Wáhlen, S. (2004b): Does National Quality Monitoring Make a Difference. In: Quality in Higher Education Vol. 10/No. 2, p. 139.

nevertheless sceptical as to the real scope of the government's influence in the business of quality assurance.[21]

Evolution of the National Quality Assurance Policy

Previous to 2001, no attempt was made to directly assess the quality of teaching or student learning. Rather, academic audits focused on those processes by which academic institutions exercised their responsibility to assure academic standards and improve the quality of their teaching and learning.[22] The aim was to determine whether universities and colleges were developing a culture that enables a continual improvement throughout their operations.[23]

After two successive evaluation cycles however, institutional audit has been supplemented (some would say replaced) by programme evaluation. In addition to a regular thematic review at institutional level (focusing on issues such as gender equality), programme evaluations are carried out every sixth year. They have the threefold aim of development, control and information to the stakeholders (i.e. students, government and employers). The 2001 reform was partly the result of student pressures; student unions complained that institutional quality audits did not provide information on the quality of the study subjects. Furthermore, it seems as if institutional audit brought about a limited scope of change. Although institutional audit raised the awareness of the effective coordination and management of academic life, the so-called quality culture did not permeate to the basic academic units.[24]

The general idea behind the programme evaluation exercise as well as its general structure were thus developed by the government and presented in a government bill. The purpose of programme evaluation is to draw a

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[21] Sjölund, M. (2002): Politics vs. Evaluation – The Establishment of three New Universities in Sweden. In: Quality in Higher Education Vol. 8/No. 2, pp. 173-183.

[22] Dill, D. (2004): Designing Academic Audit – Lessons Learned in Europe and Asia. In: Quality in Higher Education Vol. 6/No.3, pp. 187-207.

[23] Crozier, F. et al. (2005): Quality Convergence Study – A Contribution to the debates on Quality Convergence in the European Higher Eduction Area. ENQA Occasional Papers 7. Helsinki.

[24] Wáhlen, S. (2004b): Does National Quality Monitoring Make a Difference. In: Quality in Higher Education Vol. 10/No. 2.

detailed picture of the quality of the study programmes, i.e. to control for a minimum quality at every level. The HSV's function with regard to quality assurance consequently shifted from contributing to quality enhancement to providing accountability in a perspective of quality enhancement.

What was completely new is that, contrary to previous evaluation cycles, this kind of evaluation can be linked to negative and positive sanctions (i.e. the up- and downgrading of the institutions' degree-awarding status). Even though programme evaluations are now carried out in a comparative manner, no methodological modifications were introduced. It is the public perception of quality assurance that changed, motivating a lively debate on the finality and methods of evaluation/accreditation between higher education institutions and the HSV: Is the HSV really autonomous in its decision-making? How far do the competences of the agency go? Is the institutional autonomy at risk?
Does programme evaluation lead to standardisation? What kind of indicators could possibly reflect the quality output of an institution and legitimate far-reaching accreditation decisions?

Permeability of the National Quality Assurance Policy to European Developments
The permeability of Sweden's quality assurance policy to European developments is difficult to evaluate. It seems as if Sweden has always been influenced by and has partaken in European reform projects such as the 1994-1996 European pilot project. Furthermore, the HSV is an active member of the European Association for Quality Assurance in Higher Education and participated in the Joint Quality Initiative.

Nonetheless, Sweden proves to handle the implementation of the Bologna principles very carefully. In 2002, a working group was appointed by the Swedish Ministry of Education and Science in order to undertake a national degree-review. The group eventually produced a proposal circulating among the stakeholders and which shall come into effect by July 2007.

In the national Bologna report 2005, one of the main challenges of implementation identified by the Swedish rapporteur is "the protection of different national traits within the framework of the Bologna Process".[25] This statement points to the importance of national regulations and national quality culture (here defined as the national specificity of policy-makers and stakeholders to deal with issues of quality assurance) with regard to the ongoing Europeanisation process.

3.2 Quality Assurance in the United Kingdom

The most important feature of the English quality assurance system (and with some variations also of the Welsh and Scottish quality assurance systems) is that English universities are autonomous to a large extent. Indeed, universities are not even regarded as part of the public sector. Thus, the government cannot intervene directly in the business of the higher education institutions. The 'Department for Education and Skills' issues policies and programmes instead of attempting legal actions. The latter enables the state to establish an indirect relationship to the universities via intermediary bodies. The funding councils provide an externally defined framework for strategic action in higher education institutions.

The quality assurance system, as it is known today, came into being with the resolution of the Further and Higher Education Act of 1992, which transformed the existing funding bodies into three new funding councils for England and Northern Ireland, Wales, and Scotland and charged them with the responsibility for assuring the quality in teaching and learning. After having performed this task on their own for approximately four years, the funding councils withdrew from this field of activity. As a consequence, the Quality Assurance Agency for Higher Education (henceforth QAA) was established in 1997 as an independent body funded by subscriptions from universities and colleges of higher education and through contracts with the main higher education funding bodies. The agency was given the duty to review the degree programmes of all higher education institutions and to "safeguard the public interest

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[25] Röding, K. (2005): National Report 2004-2005, p. 14.

in sound standards of higher education qualifications".[26] The establishment of the QAA can be considered as the result of the growing public interest in ensuring that universities and colleges provide higher education awards and qualifications of both acceptable quality and appropriate level.

Legal Embeddedness of Quality Assurance and Quality Assurance Agencies

The legal framework of quality assurance, the Further and Higher Education Act of 1992, is of a general and abstract nature. Within this framework, the higher education institutions themselves are responsible for key processes like student admission, staff appointment, the design and evaluation of courses and curricula, the examination of students and, finally, the awarding of degrees (in the case of universities). Only in the field of regulated professions like engineering and medicine are the awards to be accredited by professional bodies.

The existence of widely autonomous institutions with self degree awarding/self accrediting power and indirect state steering structured the British quality assurance system. In 1992 the three new funding councils were given the statutory duty to ensure that the teaching provision they funded with public money was of high quality. Today, the funding councils fulfil this duty by contracting the Quality Assurance Agency on an annual basis. The QAA has to devise and implement quality assurance methods on their behalf. Incidentally, neither the law nor the funding councils define in detail how the quality procedures should be developed. Hence, the QAA itself is responsible for defining methods and criteria for the quality procedures.

Evolution of the National Quality Assurance Policy

From the beginning, the QAA conducted both institutional reviews and 'Teaching Quality Assessments' (TQA), a system-wide disciplinary review of degree programmes. Given the self-accrediting status of British universities outlined above, the quality assessments represented a major change for the higher education system. Consequently, the work done by

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[26] QAA (2003): The QAA – An introduction. Gloucester, p. 3.

the QAA, especially the TQA procedures, provoked tremendous concern among the teachers. Not only did they blame the QAA for wasting their time and resources they also criticised the organisation for interfering in the autonomy of the institutions. After the first TQA cycle had been completed in 2001, the agency switched to a lighter procedure and restricted its work to the external review of the institutions; a process that was revised again in 2003.

The evolution of the QAA procedures was accompanied by the establishment of a comprehensive external framework for quality assurance in higher education known as the 'academic infrastructure'. The academic infrastructure consists of four elements:
- a code of practice for the assurance of academic quality and standards in higher education,
- qualification frameworks,
- subject benchmark statements setting out expectations about standards of degrees in a range of subject areas,
- programme specifications which contain concise descriptions of the intended outcomes of learning in a given study programme.

These four elements are supplemented by the so-called 'external review', which means that, in principal, reviewers from other universities are involved in student assessments.

In the British case, the principle of autonomy must not be understood as the absence of external influences or regulations on internal quality assurance. On the contrary: The specificity of the British quality assurance system is its strong external component, which is integrated in the internal mechanisms of evaluation.

Permeability of the Quality Assurance Policy to European Developments
The permeability of UK's quality assurance policy to European developments is difficult to evaluate. One the one hand QAA has always played a very active and influential role at the European level. On the other hand, it is easy to get the impression that British higher education

institutions are reluctant to adopt the Bologna principles (especially in the early days). Examples such as the growing student involvement in expert groups and decision making bodies show that British higher education institutions gave in to European reform trends only recently. The introduction of accreditation mechanisms is at the core of a heated discussion: In the national Bologna report 2005, the UK stated that the institutional audit approach provides "significantly greater public information than that conveyed by a simple accreditation label".[27] Although the decisions made by QAA are quite similar to accreditation decisions, the UK sticks to the position of not introducing accreditation. In conclusion, the permeability of the quality assurance policy to European developments should be estimated as rather high as the UK was one of the European pioneers in quality assurance. European developments were heavily influenced by British evaluation activities.

3.3 Quality Assurance in Hungary

The evolution of the Hungarian quality assurance system echoes the history of democratic transition. Although the national quality assurance agency, the Hungarian Accreditation Committee (henceforth HAC) has been established as soon as 1993 by parliamentary decree, its functions were limited to the implementation check of the Higher Education Reform Act issued the same year. Its very mission and budget were then fixed by the parliament. Within this framework, the HAC's main responsibility was to accredit all higher education institutions and programmes that issued state recognised degrees, including private and denominational universities and colleges. Accreditation is still the prerequisite to a ministerial licence of operation, even though HAC statements are not binding for the government.

Although a system of internal quality assurance should have been established by 2001, few higher education institutions actually implemented such cost-intensive units. Moreover, Hungarian policy initiatives concerning the quality of higher education were/are rather modest. The system lacks clear policy guidelines and a definition of

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[27] Green, R. (2005): National reports 2004-2005. England, Northern Ireland and Wales, p. 5.

quality in higher education. It establishes a fundamental difference between the national responsibility over quality assurance, which resides with the ministry (responsible for the policy-making) and the HAC (responsible for the quality attestation) on the one hand, and the institutional responsibility of the universities and colleges on the other.

Legal Embeddedness of Quality Assurance and Quality Assurance Agencies

Hungarian quality assurance is entirely regulated by law, whereby the Higher Education Act represents the highest level of compliance. Nearly every recommendation or reform proposal is transferred into a detailed legal framework. For instance, the primary standards against which the HAC measures quality are state provisions in the Higher Education Act. The HAC has thus to control the actual realisation of the law and is accompanying the transition of the Hungarian higher education sector from a fragmented and centrally planned elite school-sector to a full-blooded, modern tertiary education system involving more than 34% of a student group.

Since 2001, the tasks of the HAC were broadened in order to include programme evaluation, as well as the evaluation of recruitment procedures and National Qualification Requirements.[28] Although the government preserves the main steering function, the HAC's evolution over the past decade, the widening of its scope of activity, can be read as the story of an incremental detachment of its accreditation activities from the legal state support and the government's sphere of intervention. One of the reasons for this change can be found in Hungary's growing European engagement.

Evolution of the National Quality Assurance Policy/Permeability of the National Quality Assurance Policy to European Developments

A first renewal of the accreditation framework took place in 2000, at the end of the first accreditation cycle. This moment coincides with the European engagement of Hungary and the HAC. The evaluation of the

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[28] NQR define the expectations and formal requirements i.e. examinations, ECTS and standards for study courses in Hungary

agencies activities by the EUA in 1999/2000 and the accession of
Hungary to the Bologna Process (1999) had a great impact on the
reformulation of the HAC's and the government's strategy in quality
assurance matters: Since then, competition, transparency and mobility
became new impetuses to higher education institutions' management.
Academic leadership and the ministry started to consider issues of
institutional efficiency, internal quality assurance and the international
dimension of quality assurance. Furthermore, one should keep in mind
that, "comparing the individual approaches of the European Association
for Quality Assurance in Higher Education (ENQA), of the European
Consortium for Accreditation (ECA) as well as the European University
Association (EUA), the high degree of similarity becomes immediately
obvious" (Hofmann 2006, p. 12). Hence, some of the ESG-principles
might already have been discussed and implemented following the EUA's
institutional evaluation of the HAC in 1999/2000.

The reform of the quality assurance framework in 2000 (especially with
regard to the finality and the methodology) pointed to
- the need of transparency and
- the need of a new strategy leading to the improvement of higher
  education quality in establishments at the aftermath of
  transition.

The HAC thus took on a new role. It became a consultant to higher
education institutions with regard to management and financial issues,
problems related to the study structure and internationalisation. The new
function repositions the national agency with regard to the government.
This emancipation from immediate political influence can be illustrated
by different points: Prior to 1999 the HAC conducted institutional
accreditation measures against very general, state-proclaimed standards
set down in the Higher Education Act. The focus was then put on higher
education input and accountability. Reports were not published and
stakeholders were not included. From 1999 on, however, the HAC
experts from various disciplines worked out sets of minimum standards
for all disciplines.[29]

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[29] Those standards and criteria are however included in the Higher Education Act's annex.

The new deal of quality assurance gears accreditation towards quality enhancement. This, in turn, had methodological implications[30]:
- the evaluation process focuses on quality output (introduction of SWOT analysis at the institutional level),
- higher education institutions have to produce a yearly 'Quality Report', which will serve as an information basis to programme and institutional evaluation,
- evaluation reports are now to be published. Stakeholder involvement is encouraged.

The HAC develops its own criteria and standards, thus gaining full control over its activities. In the past few years, issues of professionalisation have increased dramatically within discussions concerning quality assurance. The idea is to gain a professional status that would guarantee the accreditor more autonomy in its decision-making. The adoption of internationally valid standards is considered to be part of the professionalisation strategy of the HAC. Consequently, the adoption of the ESG reveals a highly political aspect in the Hungarian higher education sector.

3.4 Quality Assurance in Germany
The introduction of quality assurance in the German higher education sector has clearly been influenced by the EU project 'Quality Assessment in the Field of Higher Education'. Building on the experience of this project, the German Rectors' Conference signed the resolution Evaluation in German Higher Education Institutions with Particular Reference to the Evaluation of Teaching in 1995 and outlined the fundamental principles of quality assessment procedure in higher education.[31]

It might seem surprising that the Rectors' Conference took the lead in this development since, traditionally, the German higher education sector

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[30] It is, however, difficult to establish a clear causal link between Bologna and the reform undertaken by HAC/HAC emancipation, as European developments occur at the same time as the reorientation of the state's steering strategy: deregulation (supervision role of the state under review/financial reform), HEI autonomy.
[31] German Rectors' Conference (1995): Resolution: Evaluation in German Higher Education Institutions with particular reference to the evaluation of teaching. Bonn.

has always been subject to a high level of state control. It should be noticed that the Rectors' Conference was highly aware of the international trends and was therefore the first to engage in European projects and programmes. In 1998, quality assurance finally reached the level of legal regulation. The Higher Education Framework Law was amended to include quality assurance in teaching and learning as a statutory obligation for higher education institutions. The regional higher education laws were amended accordingly. At the end of the same year, the Standing Conference of the State Ministers of Education and Culture (henceforth KMK), took the decision to realise a German quality assurance system by introducing accreditation procedures for the new Bachelor's and Master's degree programmes. Accreditation would replace the former system of the so-called 'Framework Examination Regulations' (Rahmenordnungen) as well as the constitutive supervisory approval of degree programmes by the *Länder*. Over the years, experience has shown that the development and the promulgation of the Framework Examination Regulations was an extremely ponderous process. As it took many years to get to a conclusion, most of the regulations were already obsolete and in some cases counter-productive when they came into use.[32] In fact, the implementation of the German accreditation system has to be seen as a core element of the reform of the state approval procedure for degree programmes.

The accreditation system was implemented as a two level system with the Accreditation Council as the central player, responsible for enforcing comparable quality standards within a decentralised accreditation system. Actual programme accreditation is however performed by accreditation agencies. The duties of the Council involve: 1) agency accreditation, i.e. assigning them power of authority for a limited period of time to accredit degree courses by awarding the Accreditation Council seal, 2) monitoring agency compliance and periodic re-accreditation, 3) defining the minimum requirements for the accreditation process. The

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[32] HRK (2004): Quality Assurances at Higher Education Insitutions. Bonn.;
Schade, A. (2004): Shift of Paradigm in Quality assurance in Germany – More Autonomy but Multiple Quality assessment? In: Accreditation and Evaluation in the European Higher Education Area (Schwarz, S. and Westerheijden, D. eds.). Dordrecht.

Council also strives to ensure fair competition between the accreditation agencies.

Legal Embeddedness of Quality Assurance and of Quality Assurance Agencies

Due to the framework conditions as stipulated under constitutional law, responsibility for higher education lies mainly with the sixteen *Länder*. Recently, the federal system underwent an extensive reform, which resulted in shifting almost all responsibilities for higher education that still remained in federal hands to the *Länder*.

Quality assurance in German higher education is only partly regulated by law. The regulations concerning the two pillars of quality assurance, i.e. accreditation of degree programmes and evaluation of teaching and learning differ a great deal. The accreditation system has a clear legal basis set out in Article 9 of Germany's Framework Act for Higher Education. Article 9 states that the *Länder* are jointly responsible for ensuring equivalence of degrees, examination grades, qualifications and the possibility of their transfer from one higher education institution to another. By establishing an accreditation system under the supervision of the central Accreditation Council, the sixteen *Länder* transferred implementation of this joint responsibility to the Council.

Whereas this led to the establishment of a consistent accreditation system for Germany, there is no equivalence for the second pillar of quality assurance, the evaluation of teaching and learning. Only relatively recently, in autumn 2005, did the KMK pass a recommendation entitled "Quality Assurance for Higher Education Teaching", which recommended that higher education institutions implement a comprehensive internal quality assurance system with external components. Most of the sixteen *Länder* higher education acts contain regulations for evaluation. They are however restricted to the general duty given to the higher education institutions instead of stating details as to the aim, the methods and, most importantly, the consequences of evaluation. Thus, only two out of the sixteen German *Länder* have implemented a system and a policy for evaluation of teaching and learning.

Evolution of the National Quality Assurance System

After completion of a three-year trial period, the KMK decided to introduce accreditation on a permanent basis in 2002. From then on, accreditation is valid for all *Länder* and higher education institutions. In 2005 the Accreditation Council has been put on a new legal basis by establishing a Foundation for the Accreditation of Study Programmes in Germany. This would resolve the remaining legal insecurities of the system.[33]

Besides the fact that the accreditation council has regularly developed and reviewed accreditation standards and criteria since 2000, no major changes have been made concerning the overall accreditation approach. Only recently the Accreditation Council has been mandated by the KMK to draft recommendations on the feasibility of carrying out institutional evaluations. The reasoning behind this mandate goes back to the criticism that programme accreditation is a heavy burden for the higher education institutions (in terms of costs and human resources). This well-known debate has been reinforced by the argument that institutional approaches of quality assurance would be more compatible with the principle of autonomy of higher education institutions as basic reference point for quality assurance set forth in the Berlin Communiqué.

In the evaluation sector, a variety of agencies and networks emerged between 1994 and 2003. They all adapted the principles of evaluation established in the mid-nineties. The evolution of the evaluation sector is not easy to describe, since it has never become a consistent system based on common rules. Surveys of the German Rectors' Conference, however, point to the fact that an increasing number of higher education institutions use internal and external evaluation mechanisms.[34] This development indicates the growing importance of internal quality assurance, which is closely linked to internal management decisions.

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[33] Accreditation Council (2006): 2005 Activity Report. Bonn.
[34] German Rectors' Conference (2005): Wegweiser 2004. Bonn.

Permeability of the Quality Assurance Policy to European Developments

The permeability of Germany's quality assurance policy to European developments seems quite obvious. This is not surprising since the European pilot project 1994-1996 directly influenced the most important recommendations of the German Rectors' Conference in that matter. Subsequently, several German agencies were founding members of ENQA and of other European initiatives such as the Joint Quality Initiative or the European Consortium for Accreditation (ECA). Some of the German developments echo the discussions at the European level, as for example the addition of a follow-up as an additional phase in the evaluation process. With regard to student involvement, Germany can even be considered as example for other countries. From 1999 on, students played an active role in every phase of the accreditation process (including decision-making).

4. The Implementation of the ESG in Sweden, the United Kingdom, Hungary and Germany

4.1 ESG Implementation in Sweden

The Swedish reaction to the ESG is captured by the NOQA report on the implementation of the ESG.[35] Although this report is not to be considered as an official statement and groups together the views of as many as five Scandinavian countries, it provides the reader with a rough idea on how the ESG are regarded by Swedish stakeholders.

The NOQA reports points to four issues considered to be of importance for the implementation and the evolution of the ESG:
- the ESG focus more on what should be done, rather than on how they should be achieved. Written documents and formal arrangements are given precedence over informal practices and arrangements.
- the ESG contain a number of concepts and terms assumed to be commonly used and understood in European quality assurance

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[35] Vinther-Jørgensen, T., and Ploug Hansen, S. (2006): European Standards and Guidelines in a Nordic Perspecitve. Helsinki.

agencies. However, these terms need some clarification (i.e. organisational independence, core function, follow-up).
- more precise threshold values regarding the different standards are required if the European agencies are to be reviewed and assessed in a consistent manner.
- there is an absolute need to clarify the status of the guidelines (especially with regard to the national legal framework).

It seems as if the first reaction towards the ESG was to check national compliance with the European expectations. Most of the ESG form an integral part of Swedish quality assurance since the early 1990s. Stakeholder participation, for instance, is an important feature of Swedish higher education policy-making and management since the 1960s. Hence, students have always been involved in evaluation processes.

The guidelines that were not already implemented in the national setting were opened up to discussion. This was the case with guideline 3.7, stating the possibility to appeal against the agency's decision. The legal consequences entailed by the implementation of standard 3.7 proved to be very important as it would require the revision of the constitutional text: "This appeal possibility must […] be adapted to the legislation in force in the country in which the evaluating organisation operates. Sweden's Higher Education Ordinance lies down that no appeal may be made against a decision made by the National Agency for Higher Education pursuant to the Higher Education Act and Higher Education Ordinance".

Thus, the effects of the ESG on the national setting are de facto limited as most of the guidelines were valid before 2005. Those standards and guidelines that were not, were considered to be inapplicable to Swedish quality assurance as they were not compatible with state law. ESG 3.7 has initiated a broad and lengthy debate on the possibility to change the Swedish constitution. The outcome of this debate is not yet to be foreseen.

4.2 ESG Implementation in the United Kingdom

In accordance with the legal framework of quality assurance in higher education, the main responsibility for implementing the ESG lies with the higher education institutions themselves. Whereas universities and colleges are in charge of implementing the first part of the ESG, the national quality assurance agency, the QAA, is responsible for the realisation of part two and three of the ESG. Hence, nothing changed with regard to the distribution of tasks and responsibilities in the realm of quality assurance. Neither the ministry nor the rectors' conference took the initiative to formulate an official or formal policy statement concerning the implementation of the ESG. Not even a joint working structure for advising and/or organising the implementation process has been set up.

The overall attitude towards the ESG is not easy to capture. The current discourse on Bologna does not consider the ESG as being an urgent reform matter compared to the problematic introduction of ECTS. This is not to say that the ESG are not of interest. Rather, this situation should be seen as a sign for an overall and broad acceptance of the principles set forth in the ESG. A second possible interpretation may be that quality assurance in British higher education is already based on principles complying with the European reform agenda. The "UK Higher Education Europe Unit", an organisation funded by the British rectors conference, the three funding councils, GuildHE and the QAA, that coordinates the involvement of the UK higher education sector in the Bologna Process, stated: "The European Standards and Guidelines are, on the whole, compatible with UK quality assurance arrangements and have the potential to support the development of a quality culture and mutual trust in European higher education. […] The Standards and Guidelines will not create an additional layer of evaluation or bureaucratic burden for UK higher education institutions".[36]

Since the QAA provides the higher education institutions with substantial guidance for designing and conducting internal quality assurance, the

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[36] UK Higher Education Europe Unit (2006):
http://www.europeunit.ac.uk/resources/Submission.doc (accessed 28 July 2007).

agency plays also a major role in implementing part one of the ESG. As neither the ministry nor the funding councils have stipulated detailed regulations for the manner with which the QAA is to conduct external quality assurance, it seems as if it was entirely responsible for the implementation process. The agency has conducted a comprehensive exercise to map the compliance of the ESG to several parts of the academic infrastructure and to the principles/policies of the agency. It does not come as a surprise that the outcome of this exercise showed a broad alignment with the ESG. As far as adjustments seem to be advisable or even necessary, QAA opted for, as they called it, a "light touch", revising the respective standards or procedures within the regular terms instead of initiating a special ESG-driven revision: "Audit teams will, in practice, use the UK's Academic Infrastructure as their prime point of reference, but they will be interested to know how institutions have considered the expectations of the ESG and other guidance relating to European or international practices".[37]

Only one major change is to be expected with regards to the ESG implementation: Student participation in quality assurance procedures varies between England/Northern Ireland and Scotland. While in Scotland students are regular members of the review panels and the decision-making bodies of QAA Scotland, this is not the case in England. This is not to say that students do not participate in audits carried out by QAA England. Rather, their role focuses on providing information before and during the site visits. Recently, the co-operation between QAA England and the National Student Union has been intensified, and practicalities for having students as full members of the board of directors are explored.[38]

It seems as if British quality assurance is, on the whole, in line with the ESG. This is no surprise, since the UK was one of the European pioneers in internal and external quality assurance in higher education. Not only were international and European trends always taken into account in the

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[37] QAA (2006a): Handbook for Insitutional Audit – England and Northern Ireland. Gloucester, p. 9.
[38] QAA (2006b): Strategic Plan 206-2011. Gloucester.

development of national evaluation methods and practices; the QAA was also one of the major driving forces in the reform discussions at the European level.

4.3 ESG Implementation in Hungary

The introduction of the ESG in Hungary correlates with the amendment of the Higher Education Act in 2006, according to which new Bachelor and Master programmes shall replace the traditional, single stream college or university programmes. All require accreditation. Although the amendment of the HEA was the object of heated debates concerning the HAC's legal background, the new HEA can be considered to be the legal framework to the ESG's implementation. For instance, it established an appeal's procedure against the Committee's decisions.

Yet, the introduction of the ESG seems to entail one aspect, which differs from the implementation strategies in Sweden and the United Kingdom. The ESG are viewed by the national accreditation agency as a professional codex or an (in)formal framework for the profession. In its 2006 policy-statement statement, the HAC considers the ESG to be a means of guaranteeing its independence, its autonomous status against state-intervention: "The ESG, as articulated by ENQA and its partners and now generally established in Europe, must govern our work. This will set a solid basis on which the organisation can unequivocally define its position within higher education and the educational government, and safeguard its independence from these two vital actors in higher education".[39]

The ESG thus becomes a political stake insofar as they contribute, in the agency's view, to gain full control over its activities, i.e. to establish itself as a professional organisation independent from state control. In this respect, the HAC follows a much more offensive implementation strategy compared to the implementation strategies of agencies in other Central European countries: "While complete independence cannot be guaranteed, independence in the sense that the conclusions of an

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[39] HAC (2006): Strategy for the Hungarian Accreditation Committee.

accreditation decision should be free from outside influence should be".[40]

4.4 ESG Implementation in Germany

Given the legal framework for higher education in Germany and the binary structure of quality assurance composed of a regulated accreditation system and a diverse (not to say incoherent) system of evaluation, the responsibility for implementing the ESG lies with different actors: Due to the lack of legal regulations for internal quality assurance, part one of the ESG has to be implemented by the higher education institution individually – unless respective laws were stipulated by the regional governments. As to the second and the third part of the ESG, one has to make a difference between accreditation and evaluation. Since the accreditation system is regulated by law and the Accreditation Council issues the binding regulations, responsibility lies with the Council.

This very situation led to different implementation policies, out of which two are central: 1) The non-binding recommendations in the field of internal quality assurance and external evaluation and 2) the binding regulations for accreditation.

The so-called "National Working Group on Continuing the Bologna Process" set up a joint working group that included all relevant actors and stakeholders in the field of quality assurance (i.e. actors at the regional and state level, the Rectors' Conference, students, the Accreditation Council and the agencies) to develop overall recommendations for the implementation of the ESG. In September 2006, the National Bologna Working Group presented the outcomes of this exercise comprising a German interpretation of the ESG, as well as recommendations addressed to the higher education institutions; the *Länder* and the quality assurance agencies. Since the KMK rejected the recommendations, there is nothing like a co-ordinated or common implementation strategy for the moment.

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[40] CEE (2005): Summary and Minutes of the Steering Committee Meeting and the Workshop. Poznan, 28-29 May 2005.

Besides this joint effort, most of the actors took similar initiatives within the framework of their own responsibilities. With reference to the first part of the ESG, the KMK has issued recommendations for the design of internal quality assurance systems. The German Rectors' Conference is planning to publish recommendations in spring 2007. The German Accreditation Council finally issued recommendations on the implementation of the second and the third part of the ESG, thus affecting indirectly the overall ESG-implementation. The Accreditation Council took the opportunity of a necessary review of its standards and criteria in order to integrate those ESG that were not yet part of the framework. As a result, the ESG are today part of the regular accreditation criteria.

Generally speaking, the different implementation strategies have yet to deal with serious problems concerning the adoption of the ESG. Most of the ESG principles were already included in the accreditation and evaluation framework before 2005. After all, the German quality assurance system has been reviewed and developed with regard to international standards. Nevertheless, two major challenges are to be mentioned: In the field of external evaluation, only very few agencies are recognised by a competent public authority as requested in standard 3.2. To resolve this problem and confer international credibility on them, the *Länder* would have to implement a mechanism of recognition, i.e. to create a national evaluation system. This kind of scenario is, however, unlikely, as the *Länder* want to retain their far reaching policy-making competences at the regional level.

With reference to internal quality assurance, one has to concede that, even though the principles of the ESG are widely accepted by the higher education institutions, very few actually implemented comprehensive mechanisms for internal quality assurance.

In conclusion, the case of Germany resembles the implementation procedure in the United Kingdom and Sweden where no official/legally binding implementation strategy has been designed. As the German system of quality assurance has always looked for growing international

trends, the implementation of the ESG does not lead to fundamental changes in the quality assurance procedures. The implementation of the ESG is realised by the higher education institutions and by the quality assurance agencies, rather than through legislation or ministerial policies.

5. Conclusion

The implementation dilemma for European quality assurance policies arises from the fact that the national level of implementation has reform priorities on its own. Indeed, quality assurance fulfils a very specific function in national higher education systems and is often part of an all-encompassing deregulation strategy. Thus, quality assurance takes over steering functions, which make it highly resistible to transnational reform endeavours. All the more so, since the European reform principles are not binding for the nation states.

The adoption of the ESG introduced a significant change in quality assurance policies throughout Europe. This change has been qualified as a move from transnational co-operation and co-ordination to the implementation of a full-blooded policy-agenda at the national level: Quality assurance in the European Higher Education Area, irrespective of whether it is conducted by the institutions themselves or by the agencies, shall be based on the same principles. However, the ESG did not escape the Bologna-typical problem of implementation. As their (legal) status remains biased, the ESG-implementation strategies differ from one country to another. The national adoption of the ESG thus depends on the way 1) the ESG cope with the national quality assurance policy, 2) the ESG fit into the legal setting in place and the priorities of its main actors and 3) the enforcement-possibilities at the supranational level.

All in all, the ESG were found to be roughly in line with the national quality assurance policies and the professional self-understanding of the accreditors/evaluators. In fact, very little divergence from the ESG has been found in Sweden, the United Kingdom, Germany and Hungary. This might be due to the fact that all four countries look back on an early

engagement into quality assurance projects and programmes at the European level. The actual implementation process of the ESG thus started well before 2005.

Since responsibility over quality assurance differs from country to country, the implementation strategies vary, too. While the ESG are partly transferred into the legal framework in Hungary; Sweden, the United Kingdom and Germany handle the ESG as non binding recommendations:

- In Sweden the actual design of internal and external quality assurance in higher education is strongly based on autonomous regulations by the national agency, and not by legislation or national policies. Thus, the implementation of the ESG lies with the agency in the first place.
- This also applies for the British quality assurance system. Existing policies and the legal framework make the implementation a matter of the higher education institutions and the QAA. Since the QAA has implemented the ESG in its procedures, it seems to be the most important actor in the implementation process.
- The German federal system and the binary structure of quality assurance make a nationwide implementation strategy almost impossible. Due to the lack of legal regulations for internal quality assurance, part one of the ESG has to be implemented by the higher education institution. The Accreditation Council as part of its biannual review implemented ESG II and III.
- The Higher Education Act regulates Hungarian quality assurance in detail. Some of the ESG were thus transferred into legally binding standards.

Given the variety of actual implementation strategies, it seems highly unlikely that the ESG will lead to the emergence of a unified/unique European quality assurance system. The impact of national policies and regulations on the implementation process raises questions concerning the consequences of non-compliance. This, however, sends us back to the issue of the ESG's status, a much debated and unresolved problem in the four countries under investigation.

Therefore, there can be little doubt that the biannual conferences will continue to play a key role in shaping a common understanding of the vision, the working mechanisms, and the actual objectives of the ESG.

Bibliography

Accreditation Council (2006): 2005 Activity Report. Bonn.

Aelterman, G. (2006): Sets of Standards for External Quality Assurance Agencies – A Comparison. In: Quality in Higher Education. Vol. 12/Nr. 3. p. 227-233.

Beerkens, E. et al. (2005): Issues of Higher Education Policy – An Update on Higher Education Policy Issues in 2004 in 11 Western Countries. Den Haag.

Bergen Communiqué (2005): The European Higher Education Area - Achieving the Goals. Communiqué of the Conference of European Ministers Responsible for Higher Education. Bergen.

Berlin Communiqué (2003): Realising the European Higher Education Area. Communiqué of the Conference of Ministers in charge of Higher Education. Berlin.

CEE (2005): Summary and Minutes of the Steering Committee Meeting and the Workshop. Poznan, 28-29 May 2005.

CEE (2006): Summary and Minutes of the Steering Committee Meeting and the Workshop and the General Assembly. Schloss Retzhof, 29-30 May 2006.

Crozier, F., Curvale, B., and Hénard, F. (2005): Quality Convergence Study – A Contribution to the debates on Quality Convergence in the European Higher Education Area. ENQA Occasional Papers 7. Helsinki.

Csizmadia, T. (2006): Quality Management in Hungarian Higher Education – Organisational Responses to Governmental Policy. CHEPS.

Dill, D. (2000): Designing Academic Audit – Lessons Learned in Europe and Asia. In: Quality in Higher Education Vol. 6/Nr. 3, pp. 187-207.

ENQA (2003): Quality Procedures in European Higher Education. Helsinki.

ECA (2004): Code of Good Practice.

ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki.

European Commission (1995): European Pilot Project for the Evaluation of Quality in Higher Education. Brussels.

German Rectors' Conference (1995): Resolution: Evaluation in German

Higher Education Institutions with particular reference to the evaluation of teaching. Bonn.

German Rectors' Confrence (2005): Wegweiser 2004. Bonn.

Green, R. (2005): National reports 2004-2005. England, Northern Ireland and Wales.

Högskoleverket (2005): Quality Assurance Policy for the National Agency for Higher Education's Evaluation Operations.

HAC (2005): Main Elements in the 2004 Higher Education Act.

HAC (2006): Strategy for the Hungarian Accreditation Committee.

Harvey, L. and Green, D., (1993): Defining quality. In: Assessment and Evaluation in Higher Education Vol. 18/No. 1, pp. 9-34.

HRK (2004): Quality Assurance at Higher Education Institutions. Bonn.

Hofmann, S. (2006): Mapping External Quality Assurance in Central and Eastern Europe – A Comparative Survey by the CEE Network. Helsinki.

Hopbach, A. (2006): The European Standards and Guidelines and the Evaluation of Agencies in Germany. In: Quality in Higher Education Vol. 12/No. 3, pp. 235-242.

INQAAHE (2005): Guidelines of Good Practice. Dublin.

Lane, J. (2000): New Public Management. London.

Neave, G. (1998): The Evaluative State Reconsidered. In: European Journal of Education Vol. 33/Nr. 3, pp. 265-284.

Prague Communiqué (2001): Towards the European Higher Education Area. Communiqué of the meeting of European Ministers in charge of Higher Education. Prague.

QAA (2003): The QAA - An introduction. Gloucester.

QAA (2006a): Handbook for Institutional Audit – England and Northern Ireland. Gloucester.

QAA (2006b): Strategic Plan 2006-2011. Gloucester

QAA (2006c): Code of Practice for the Assurance of Academic Quality and Standards in Higher Education. Gloucester.

Röding, K. (2005): National Report 2004-2005.

Rozsnyai, C. (2005): Qualitätssicherung in Bewegung – Das ungarische Hochschulwesen der ersten Akkreditierungsphase. In: Akkreditierung im Hochschulraum Europa (Schwarz, S. et al. eds..), Bielefeld.

Rozsnyai, C. (2004): A Decade of Accreditation in Hungary – Lessons learned and Future Directions. In: Quality in Higher Education Vol. 10/Nr. 2, pp. 129-138.

Schade, A. (2004): Shift of Paradigm in Quality assurance in Germany – More

Autonomy but Multiple Quality assessment? In: Accreditation and Evaluation in the European Higher Education Area (Schwarz, S. and Westerheijden, D. eds.). Dordrecht.

Sjölund, M. (2002): Politics vs. Evaluation – The Establishment of three New Universities in Sweden. In: Quality n Higher Education Vol. 8/Nr. 2, p. 173-183.

Snyder, F. (1994): Soft Law and Institutional Practice in the European Community. In: The Construction of Europe (Martin, S. ed.). Dordrecht.

Temple, P. and Billing, D. (2003): Higher Education Quality Assurance Organisation in Central and Eastern Europe. In: Quality in Higher Education Vol. 9/Nr. 3, pp. 243-258.

Tomusk, V. (2000): When East meets West: decontextualizing the quality of East European higher education. In: Quality in Higher Education Vol. 6/No. 3, pp. 176–85.

Trow, M. (1996): Trust, Markets and Accountability in Higher Education. In. Higher Education Policy Nr. 9, pp. 309-324.

UK Higher Education Europe Unit (2006): http://www.europeunit.ac.uk/resources/Submission.doc (accessed 28 July 2007).

Vinther-Jørgensen, T. and Ploug Hansen, S. (2006): European Standards and Guidelines in a Nordic Perspective. Helsinki.

Van Vught, F. (1994): Intrinsic and Extrinsic Aspects of Quality Assessment in Higher Education. In: Changing Contexts of Quality Assessment – Recent trends in Western European Higher Education (Westerhijden D. et al. eds.). Utrecht, pp. 31-50.

Wáhlen, S. (2004a): From Audit to Accreditation-Like Processes – The Case of Sweden. In: Accreditation and Evaluation in the European Higher Education Area (Schwarz, S. and Westerheijden, D. eds.). Dordrecht.

Wáhlen, S. (2004b): Does National Quality Monitoring Make a Difference. In: Quality in Higher Education Vol. 10/Nr. 2, pp. 139-147.

Williams, P. (2006): Qualitätssicherung im Vereinigten Königreich – Aus Erfahrung gelernt und den Grundstein gelegt. In: Handbuch Qualität in Studium und Lehre. Berlin.

3. The Stakeholders' Perspective

Reports and comments

3.1. The Bologna Process in a Swedish Perspective
Dr Clas-Uno Frykholm

- The Higher Education Act and the Higher Education Ordinance have been rewritten and adapted to the Bologna agreement.
- The new regulations concerning the degree system and the grading system will enter into force as from July 1, 2007.
- Reform activities at the Higher Education Institutions (HEIs) mostly focus on
    1. reworking curricula and syllabi,
    2. rewriting aims and objectives into learning outcomes, and
    3. developing new Master programmes.

Implementation of ENQA's Standards and Guidelines at HEIs
- The reform process is promoted by specially appointed academics and other experts (Bologna promoters) on a national and institutional level.
- There have been four Bologna seminars with special reference to the Standards and Guidelines; targeting middle management at all HEIs in Sweden.
- Institutions have largely accepted the Standards and Guidelines, and most of the institutions have started to implement them.
- There are big differences between different institutions in how far they have reached in implementing the Standards and Guidelines. Some are already in compliance with the ESG, while others have just begun to build up their internal quality assurance (QA) systems.

Implementation of ENQA's Standards and Guidelines at national level

- At the level of national quality assurance, Sweden has been in line with most of the Standards and Guidelines for several years.
- We take into account internal QA procedures of higher education institutions, criteria have been publicly available, processes are fit for purpose in the sense outlined in the Standards and Guidelines, the reports are public and there are follow-up procedures.
- Reviews are periodic in six-year cycles and we produce yearly summary reports, including analyses on specific themes such as internationalisation, student support etc.
- The Swedish National Agency for Higher Education (HSV) has an internal monitoring system for its own evaluation activities, and is to be externally evaluated at least every five years.
- HSV has been revised by external experts, and thus approved by ENQA as one of the first national agencies for full membership.

Components of the new Swedish system for external Quality Assurance

- Quality audit of HEI's internal QA systems, to make sure that they are in compliance with ENQA's Standards and Guidelines. All HEIs will be assessed within a six-year period.
- Subject and programme reviews in two steps:
- production of an overview based on documents, key-figures and simplified self-evaluations,
- selection and in-depth studies of subjects and programmes at risk. All subjects and programmes will be assessed within a six-year period.
- Accreditation of new programmes, especially the Bologna Master for what we call university colleges.
- Thematic studies on specific topics related to quality in higher education.
- An award for excellence, to be given to outstanding teaching and learning environments.

Some comments on the development of the new Swedish system for Quality Assurance

- The new system has been developed with the active involvement of stakeholders, including HEIs and students, through seminars, meetings with quality assurance staff from HEIs, circulation for comment to all the HEIs and the National Union of Students.
- The stakeholders' comments have on the whole been favorable, but suggestions for improvement have been given and taken into account.
- It may be seen as a rather ambitious model which includes both audits of all HEIs and subject and programme reviews. But the latter will be selective in the sense that only 30 per cent of programmes will be singled out for special attention. And the institutions that have a well functioning QA system can be expected to have programmes that do not run the risk of being singled out.

Further developments at the European level, and possible contributions to the London communiqué

- Comparisons between the Swedish system and other QA systems in the Nordic countries showed that national traditions and legislation could be in conflict with the Standards and Guidelines, and the question if national contexts should be viewed as a reason for exemption from the European standards was raised.
- The fact that national agencies should be revised on a national basis also raised the question of how to assure the consistent use of the standards, and a call for more precise threshold values regarding the different standards was made.
- The wording of some of the standards, the meaning of some specific terms and the status of the guidelines as compared to the standards will also need some clarification.

- In the future, cooperation between institutions and QA agencies across national borders will become more important. On institutional level, we will probably see more of joint degrees, which will call for common strategies and procedures for quality assurance. Further development of the work that was carried out in the Transnational European Evaluation Project II (TEEP II) will thus be needed.
- In general, comparisons, benchmarking of QA activities and cooperation in carrying out quality audits, reviews and evaluations of subjects and programmes should be encouraged to ensure unity in use and a continuous development of the Standards and Guidelines.

3.2 The European Standards and Guidelines: A View from the UK
Lee Harvey

Introduction
The following account explores the European Standards and Guidelines[1] from a UK point of view. The extent to which the ESG are an integral part of existing arrangements will be highlighted although this is not meant to be an account of how well the UK complies with a checklist of criteria. As there are four countries in the UK with somewhat different systems, most of these comments will apply to England.

The UK was one of the 'pioneers' of quality assurance in higher education, which started around 1990, although it has a long history of professional accreditation and external standards checking that predates 'quality revolution'. It should be noted that the initial introduction of quality assurance procedures into higher education in the UK was as much about the political accountability of institutions as it was about any concern with quality of provision.

ESG: underlying principles
There are three principles underlying the ESG. The first is that the Guidelines take into account the interests of students as well as employers and, more generally, of the society in good quality higher education. The second reinforces the central importance of institutional autonomy, tempered by a recognition that this brings with it heavy responsibilities. The third argues that there is a 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.

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[1] ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki.

These underlying principles reflect the situation in the UK, although some academics might argue that institutional autonomy is being eroded by increasing scrutiny and requirements to conform to quality procedures and that the burden has not been appropriate and necessary.

The ESG are in three parts, the first dealing with internal procedures, the second with external quality assurance and the third with the quality assurance of the external agencies. The following addresses some of the sections in the ESG.

Approval

This important section suggests that institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards. In the UK, all institutions have this in place in one form or another. For the new universities, especially those that were once regulated by the Council for National Academic Awards, such a process has evolved over 40 years. Key elements of this process that are clearly found in the UK system are publication of explicit intended learning outcomes; careful attention to curriculum design; formal programme approval procedures by a body other than that teaching the programme; monitoring of the progress and achievements of students; regular periodic reviews of programmes (including external panel members) and appropriate learning resources.

Perhaps the UK is not as strong as it might be on securing "regular feedback from employers, labour market representatives and other relevant organisation". Institutions make an effort to engage employers but the level and consistency of such engagement varies considerably within and between institutions.

The UK is also not as good as some other countries (particularly the Nordic countries) in developing the participation of students in quality assurance activities. More often than not, students are seen as clients of the quality assurance approach rather than power sharers or even contributors to it. The audit contributions now provided by Students' Unions in the UK gives students a higher profile. Students are not,

though, included in external evaluation teams and there is no consistent approach to the involvement of students in institutions' internal processes.

Assessment of students (section 1.2)

Assessment of students is another key area of the ESG and the UK has, for some time now, been assessing students using published criteria, regulations and procedures, which are applied consistently. Procedures adopted in the UK are not completely consistent within and between all institutions but in the main they do measure the achievement of the intended learning outcomes; are appropriate for their purpose and have clear and published criteria for marking. However, the marking criteria are often generic for a programme rather than specific to every piece of assessed work.

Procedurally, there are clear regulations covering student absence, assessments are conducted securely in accordance with the institution's stated procedure and are usually subject to administrative verification checks to ensure the accuracy of the procedures.

There are three other items to guideline 1.2 which are rather more problematic. The problem is not so much that they cannot or are not achieved in the UK but that the Guidelines are themselves problematic. Firstly, there is a statement that assessment should "be undertaken by people who understand the role of assessment in the progression of students towards the achievement of the knowledge and skills associated with their intended qualification". In principle, this occurs but it is hard to verify this in any specific case because the theoretical understanding of the role of assessment goes beyond 'normal' pedagogy and requires quite sophisticated understanding of learning theory.

The second contentious area is the requirement not to rely on the judgement of single examiners. The key issue here is not the 'single' (albeit sometimes difficult to assess certain coursework using more than one assessor), the problem word is 'examiner' as this implies that valid assessment involves examinations. Perhaps the term examiner is meant

to imply a generic assessor (of theses, essays, laboratory reports' creative arts) rather than specifically someone who marks examination scripts. If that is the case then the use of the term 'examiner' is unfortunate.

The third contentious area is that institutions should take account of "all the possible consequences of examination regulations". There is no way that, in practice, all the possible consequences can be covered. This is clearly an ongoing process and requires flexibility in the application and modification of assessment regulations. Again the term 'examination' in the Guidelines rather than 'assessment' is unfortunate.

Teachers (section 1.3)

Section 1.3 suggests that institutions should have ways of satisfying themselves that staff involved with the teaching of students are qualified and competent to do so. The older universities in the UK have not traditionally sought qualified teachers when making appointments to lectureships, often focusing on research credentials. The newer universities, with a more teaching-focused mission have been more inclined to recruit on the basis of teaching experience or qualification. However, most higher education institutions now have in place a form of in-house training for new (and in some cases existing) staff.

Nonetheless, there is still a widespread use of graduate students and teaching assistants especially in the research-focused universities in the UK. There is little evidence to suggest that such teachers are qualified and competent to do the job. What training, if any, these assistants have is usually derisory. It is claimed that they are often expert in their area but such expertise, where it exists, does not mean that they are competent to teach. Furthermore, assistants are often used to teach in areas in which they have cursory or background knowledge. It is often first-year students, the very ones that need to be motivated by good quality teaching, who suffer at the hands of inexperienced and inadequately trained staff.

A specific area in the Guidelines is the ability of teachers to access feedback on their own performance. In the UK, there is a well-developed process of collecting feedback from students at a variety of levels,

including feedback on teacher performance at the module level. The key question, though, is not the collection of feedback but the use of it to modify practice and course content.

Public information (section 1.7)

Public information is an area where, on the face of it, the UK excels. The ESG propose that institutions should regularly publish up-to-date, impartial and objective information, both quantitative and qualitative, about the programmes and awards they are offering.

In the UK, not only do institutions publish curricula and other forms of marketing material but they also contribute to the Teaching Quality Information web site[2] and their information is also available on the Universities and Colleges Admissions Service website.[3] Further, the reports of Quality Assurance Agency for Higher Education (QAA) for each institution are available on line from the QAA site[4] and there are also a plethora of league tables produced by various organisations.

TQi Site

The UK TQi (2007) site is probably a development without parallel in Europe. It claims to give access to up-to-date information about the quality of higher education in UK universities and colleges. The site is supported by the government and the National Union of Students and is aimed primarily at potential students. It provides official statistics including actual entry qualifications, progression through the course, degree results and careers of graduates. It also includes the results of the national student survey, information provided by the universities, including teaching and learning strategies, summaries and links to QAA reports, employer needs and trends, as well as abridged external examiner reports and internal reviews.

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[2] Teaching Quality Information (TQi), 2007, Website home page,
  http://www1.tqi.ac.uk/sites/tqi/home/index.cfm, accessed 20th March, 2007.
[3] Universities and Colleges Admissions Service (UCAS, 2007), Website home page
  http://www.ucas.ac.uk/ ,accessed 20th March, 2007.
[4] Quality Assurance Agency for Higher Education (QAA, 2007), Website home page
  http://www.qaa.ac.uk/ accessed 20th March, 2007.

However, it is not easy to find actual curricula as these are still on the separate UCAS site, although there are plans to link them.

The presentation of the national student survey results, though, is limited. The national student survey, which covers just final-year students, asks rather general questions on several scales. The results have, so far, been of limited value for institutions as an improvement tool (they are used mainly as league tables although not intended as such) and have been of little value to potential students as the results are grouped together in a way that provides little insight into the views of students on a particular course.

The data, such as it is, is presented for subject areas. Thus, for example, the data is provided for a subject area as wide as Sociology, Social Policy and Anthropology. In one university this covers:
-   BA (Hons) Social & Policy Studies,
-   BA (Hons) Sociology,
-   MA Applied Social Research.

While at second institution it covers:
-   BA (Hons) Applied Social Science/ Criminological Studies/ English Literature and Language/ Screenwriting (at an associate college),
-   BA (Hons) Business and Public Policy,
-   BA (Hons) Criminology (and Social Policy/ Sociology/ Psychology),
-   BA (Hons)/Dip in Social Policy, Sociology, Social Studies, Applied Social Studies, Social Science and Law, Psychology and Sociology, Social Policy and Sociology,
-   BSc (Hons) Law and Psychology, Psychology,
-   LLB Law. LLB Hon Maitrise en Droit (France). BA (Hons) Law and Business; Legal Studies; Law and Criminology,
-   MA Cultural Policy and Management,
-   MA Social Science Research Methods,
-   MA Social Science Research Methods Business and Management,

- MA Sport in Popular Culture/ MSc Sport Management/ MSc Exercise Science and Wellness/ MSc Sport Injury (Medicine)/ MSc Sport Injury (Physiotherapy)/ MSc Sport Injury (Science)/ MSc Sport Development/ MSc Sport and Exercise Science,
- MA/PgD/PgC Criminal Justice.

Such divergence means it is impossible to compare courses.

In addition, there has to be a minimum number of responses to be reported and the numbers are also rounded to the nearest 5. So, an entry within insufficient data might appear as follows:

"Data cannot be displayed for Sociology, Social Policy and Anthropology for the latest year at University XXX because, although at least half of the surveyed students responded to the survey, there were less than 30 responses. The data displayed is for Sociology, Social Policy and Anthropology for the latest and previous years combined."

Stakeholder reactions to the TQi site are varied. According to the Association of Graduate Recruiters (AGR), most employers have never heard of it. The few that have heard of it do use it but as it is designed for intending students it is not attractive to employers. It would be more useful if there was a version for employers (which focused on information relating to graduates rather than recruits). Employers' first reference points are university league tables (not that they always understand how league positions are arrived at). Employers are swayed by other employers, the reputation of the institution and their past recruitment experience.

According to a Students' Union officer at Sheffield Hallam University, many students have never heard of the TQi site, although they all use the ACAS site when applying. Linking the TQi and ACAS sites will give higher visibility to the former. Despite its intention, the TQi site does not currently act as a main determinant of student choice for prospective students.

Development of EQA processes (section 2.2)
Moving to the second section of the ESG, Britain has a well-established
system of external quality assurance. The history is a chequered one with
the different countries in the UK having different experiences. England,
by far the biggest system, experienced a period of tension between the
universities and the quality agency. The Guidelines suggest that the aims
and objectives of quality assurance processes should be determined
before the processes themselves are developed, by all those responsible
(including higher education institutions) and should be published with a
description of the procedures to be used. While the details were
published, there were times when the methods appeared to be
determined (in part because of political interference from ministers)
before the aims and objectives were properly developed through a
process of meaningful consultation. The UK has been characterised by
"consultations on the margin", that is the basic idea or structure has
been predetermined and the sector has been asked to comment on (often
methodological) detail. This resulted in a long period of lack of trust and
animosity on both sides, which spilled over into internal conflicts within
institutions as the quality process seemed to endorse managerialist
approaches. Currently, consultation with the sector is improving and
there is a growing acceptance of the new quality assurance processes.

Criteria for decisions (section 2.3)
The ESG propose that any formal decisions made as a result of an
external quality assurance activity should be based on explicit published
criteria that are applied consistently. Here the UK has a good track record
with very few situations where the applications of criteria have been
fundamentally challenged.

Processes fit for purpose (section 2.4)
The ESG propose that all external quality assurance processes should be
designed specifically to ensure their fitness to achieve the aims and
objectives set for them. This guideline raises the hoary problem of
whether "fitness for purpose" is an appropriate approach to quality
assurance.[5] The UK approaches are "fit for purpose" in as much as

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[5] Harvey, L. (2006a): Understanding Quality. In: Purser, L. (Ed.): EUA Bologna Handbook:

purposes are specified but whether that means they improve quality, surely the underlying purpose, is a moot point.

What has tended to happen is that a particular methodology has become enshrined in stone. The process of self-assessment, peer review, supported by statistical indicators where appropriate, and publication of outcomes has become the standard approach, irrespective of whether it is the most appropriate.[6]

Follow-up (section 2.6)
An area where there is room for improvement in the UK is follow-up action. The Guidelines suggest that quality assurance processes that contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently. The extent to which the follow-up process is predetermined and the consistency of implementation appears to be variable. Furthermore, there is a difference between having recommendations and an action plan and actual implementation, especially in a large, complex institution.

Inconsistency in follow-up also applies for internal procedures, where often there is not the process in place or resources for comprehensive follow up.

Periodic and overviews (sections 2.7 and 2.8)
The Guidelines also suggest that reviews are undertaken on a cyclical basis and that the agency provide system overviews. The UK system is cyclical and there is a history of good system reviews already in place.

Making Bologna word. Berlin.
[6] Harvey, L. (1998): An assessment of past and current approaches to quality in higher education. In: Australian Journal of Education Vol. 42/No. 3, pp. 237-55.

Standards for agencies (section 3)

The standards identified in the ESG for agencies closely mirror those set
out in the Guidelines of Good Practice of the International Network of
Quality Assurance Agencies in Higher Education[7], which are based on an
ongoing evaluation of best practice among agencies worldwide. In many
respects, these practices were initiated and developed in agencies in
North West Europe, including those in the UK.

There is an official system of agencies in the UK, both central quality
assurance agencies and registered professional and regulatory bodies.
The recognised agencies undertake quality assurance on a regular basis.
In the case of the QAA, quality assurance is its *raison d'être* and it has a
clear mission statement to that effect, is adequately resourced,
independent in its decision-making and accountable for its activities and
expenditure of public money.

QAA also has clearly articulated processes reflecting the ESG, although it
is a moot point whether the ESG should specify processes and criteria.

Conclusion

Overall, the ESG reflect the process already in place in the UK. That the
UK is already largely commensurate with the Guidelines may result in
them not being taken too seriously, as little fundamental has to change.
On the other hand, being a leading player in a European initiative may
encourage a more internationalised perspective from the UK higher
education sector.

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[7] INQAAHE (2006): Guidelines of Good Practice. Dublin;
Harvey, L. (Ed.) (2006b): Guidelines of Good Practice: International Network of Quality
Assurance Agencies in Higher Education. In: Quality in Higher Education Vol. 12/No. 3,
pp. 221-6.

References

European Association for Quality Assurance in Higher Education, (ENQA) (2005): Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki. Known as the ENQA Guidelines as the European Association was, until November 2004, the European Network for Quality Assurance in Higher Education, hence the initials ENQA, which have been retained despite the change of name.

Harvey, L., (1998): An assessment of past and current approaches to quality in higher education. In: Australian Journal of Education Vol. 42/No.3, pp. 237–55.

Harvey, L. (2006a): Understanding quality. In: Purser, L. (Ed.): EUA Bologna Handbook: Making Bologna work, Brussels European University Association and Berlin, Raabe. http://www.bologna-handbook.com/.

Harvey, L. (Ed.) (2006b): Guidelines of Good Practice: International Network of Quality Assurance Agencies in Higher Education. In: Quality in Higher Education Vol. 12/No.3, pp. 221–6.

International Network of Quality Assurance Agencies in Higher Education (INQAAHE) (2006): Guidelines of Good Practice. Dublin.

Quality Assurance Agency for Higher Education (QAA, 2007), Website home page http://www.qaa.ac.uk/ accessed 20th March, 2007.

Universities and Colleges Admissions Service (UCAS, 2007), Website home page http://www.ucas.ac.uk/ ,accessed 20th March, 2007.

Teaching Quality Information (TQi), 2007, Website home page, http://www1.tqi.ac.uk/sites/tqi/home/index.cfm, accessed 20th March, 2007.

3.3. The Implementation of the European Standards and Guidelines (ESG) in Hungary and some Comments on the ESG

Dr Tibor R. Szanto, Hungarian Accreditation Committee (HAC)

The Hungarian Accreditation Committee (HAC)
The HAC was officially established by the Higher Education Act of Hungary in 1993. It is a national agency with a rather wide scope of activities including evaluation based accreditation of HEIs (new and operating, public and private) and study programmes (new and operating, public and private), and giving expert opinion on various QA related issues, including e.g. the appointment of professors at universities.

As to its organisation, the HAC consists of a Body and a Secretariat. The Body has 29 members delegated by the Rectors' Conference (15), the Hungarian Academy of Sciences (8), and various stakeholder organisations (7). Currently also 6 non-voting experts are invited to cover disciplines not represented by the members. The HAC has disciplinary subcommittees chaired by the respective member/invited expert of the Body. Members of the subcommittees are external experts.

The HAC is a public service organisation funded from the state budget (~ 90%) and expert fees paid by HEIs (~ 10%).

Accreditation is compulsory in Hungary for state recognition of HEIs and degrees to be awarded. The accreditation decisions and reports on HEIs include recommendations for quality enhancement. The accreditation of HEIs is performed in an 8 year cycle. In its current activities the HAC introduced some shifts of emphasis as follows:
- ESG became a major reference point in institutional accreditation (2006/07),
- evaluation of internal QA mechanisms at HEIs is part of institutional accreditation (2005/06),

- disciplinary (or "parallel") evaluation and accreditation of the same study programmes taught at different institutions is introduced (2003/04).

ESG Part 1, QA of HEIs in Hungary

The HAC conducted a full scale survey (internet questionnaire) as to the internal quality assurance of HEIs in 2004. Out of the then 68 existing HEIs in Hungary[1], 49 responded which means a very good response rate. The main results of the survey were the following (data are given in relation to all HEIs):

- 2/3 of all HEIs had separate QA organisation or person responsible for internal QA;
- in 1/3 of all HEIs there was student involvement in the internal QA organisation;
- 28 % (19 HEIs) stated to have an operating QA system, in 22 % (15 HEIs) the establishment of such a system was in progress;[2]
- Half of the HEIs had conducted needs analysis (mainly among students and/or instructors);
- 2/3 of HEIs had conducted satisfaction surveys among students, 1/3 among instructors and/or alumni.

The major difficulties the HEIs encountered when introducing the internal QA mechanisms were the resistance and reluctance of instructors and the lack of capacity and competence to build a QA system.

The most important gains and results for them were considerable improvement as to the internal information and documentation processes, more reliable and objective assessments as to the performance of individual instructors, and clarification of the various roles and responsibilities on the institutional and faculty levels.

As to the advice to other institutions the following were the most characteristic:

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[1] In March 2007 there are altogether 72 state recognised HEIs in Hungary.
[2] An interesting background information is that the Higher Education Act in force at that time prescribed for the HEIs to establish an internal QA system by the end of 2002.

- Quality assurance should not be introduced just for its own sake;
- The need for tailor-made models, the fitness for purpose principle;
- All faculty, staff and possibly students should actively be involved.

The overall national situation in relation to ESG Part 1 in Hungary in Spring 2007 can be described as follows:

a) There is a definite influence of ready-made QA models (ISO, EFQM).
- There are several HEIs and faculties having certified ISO systems (e.g. medical faculties).
- There are several QA projects ongoing, financed from EU funds (the National Development Plan I). Four consortia have been awarded a grant ranging from 300,000 to 1,000,000 EUR, involving 4-6 HEIs each. All four projects are based on the EFQM self assessment model, only two of them taking note of the ESG.
- The Quality Award for Higher Education is to be introduced. From 2007 on, the yearly awards will be given in various categories by the minister of education based on EFQM self- and external assessments and the proposals of a special committee.

b) The new Higher Education Act of 2005 (in force from March 2006) introduced a new element as to the internal quality assurance of HEIs. Institutions are expected to introduce quality development programmes, the monitoring results of which should be made public on the HEI's website.[3]

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[3] Section 21 (6) The higher education institution shall prepare a quality development programme. The institutional quality development programme shall specify the process of operation of the higher education institution, as part thereof the execution of management, planning, control, measurement, assessment, and consumer protection related tasks. The institutional quality development programme shall also regulate the rules pertaining to the evaluation of teacher performance by the students. The higher education institution shall annually revise the implementation of the institutional quality development programme, and shall publish its findings on the website of the institution as well as in customary manners.

c) Beyond the regular evaluation and accreditation activities the HAC has made the following initiatives in this respect.

- The translation of the substantial chapters of the ESG into Hungarian, their publication on the HAC website (together with a link to the full English version), and writing of a letter to all HEIs drawing their attention to these documents.
- ESG Part 1 became a set of reference points built in the institutional accreditation process from 2006/07 on. The HAC organised a conference on this issue for QA representatives of HEIs. The ESG has been integrated in the training of experts (visiting panels).
- The HAC introduced the Place of Excellence Award for study programmes and institutional organisational units in 2005, available to those involved in the actual disciplinary accreditation procedure.

ESG Part 2, External QA in Hungary
The establishment and actual operation of the quality development programmes and the monitoring results of those programmes (see above) are to be taken into consideration in the external quality assurance process.

Otherwise, external QA procedures in Hungary are rather robust and well developed, as they were briefly summarised in part I of this paper. Nevertheless, there is still some room for enhancement, especially in the following respects.

- Standard 2.2, goals and procedures: When revising the current institutional and disciplinary accreditation standards and procedures, a preliminary impact assessment could be made.
- Standard 2.3, criteria: The consistency in the application of accreditation criteria could be enhanced.
- Standard 2.4, fitness of processes: Even more emphasis should be laid on the proper training of experts, and their more active participation in the training seminars and briefing sessions should be ensured. More foreign experts should be involved in the external QA processes.

- Standard 2.8, system-wide analyses: More effort should be devoted to regularly draw the general conclusions from the external QA activities, to make system-wide analyses focusing on individual disciplines, various types of programmes and HEIs, and national level QA lessons in general. Research and development activities could also be promoted.

ESG Part 3, QA agency in Hungary
As to the national QA agency in Hungary, the Hungarian Accreditation Committee, the Higher Education Act of 2005 introduced some changes and new elements.

- Standard 3.4, resources: The state financing is to be provided (from 2008 on) as a fixed proportion of a defined part of the overall national higher education budget. Moreover, HEIs have to pay (since July 2006 on) an expert fee to the HAC for giving opinion on the launching of new study programmes and doctoral schools. (The HAC's supportive expert opinion is needed for launching new programmes and doctoral schools.)
- Standard 3.7, external criteria and processes: The appeals procedure has been refined. The HAC's standing Appeals Committee has been established. Members of this committee are not HAC members (but must have some earlier experience in national level external QA). In the decision making process related to a given appeal, those experts cannot take part in any way who took part in the first level procedure.

As to the European standards for agencies, the following can be considered for possible refinements and enhancement.

- Standard 3.5, mission statement: Currently, the HAC does not have a separate mission statement. There was such a section in the previous strategic plan of the HAC (2001) but the new one (2006) is a more focused and streamlined document which, after giving an overview of the current problems of HE in Hungary, concentrates on the major strategic directions and tasks of the HAC. Otherwise, the mission and tasks of the HAC in general are

included in the relevant legal regulations (Higher Education Act of 2005, Government Decree on the HAC, 2006.)
- Standard 3.6, independence: The independence of the individual members of the HAC from HEIs could be strengthened by paying even more attention to the adherence to the Code of Ethics of the HAC.
- Standard 3.8, accountability: An overall quality policy document could be made and published on the HAC's website. The next[4] external review of the HAC is to be made (scheduled for 2008).

Summary of parts II-IV.
The implementation of the ESG in Hungary can be briefly summarised as follows.
- There were no dramatic changes needed in Hungary in relation to either parts of the ESG.
- The new Higher Education Act of 2005 (in force from March 2006) introduced some new elements both as to the internal and external QA processes.
- Some refinements and improvements are still (as always) possible.
- An important task is to monitor the implementation of the various regulations and national and international requirements that is, to check the congruence of theory and practice in relation to QA of HE in Hungary. This task is to be accomplished by both HEIs themselves, the national QA agency (system-wide reports!), and the external panel reviewing the agency in 2008.

I. Comments on the ESG
The ESG is a document approved by the European Ministers of the Bologna Process and as such it can only be revised or modified by the same procedure as it was accepted. Nevertheless, as actual implementation began in many countries, experience with working with the Standards and Guidelines suggests the need of some possible

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[4] The first external review of the HAC was accomplished in 1999-2000. The major documents of that review including the self-evaluation report and the final evaluation report are accessible at the HAC's website:
http://www.mab.hu/english/doc/extevalhac.pdf

clarification and further elaboration.[5] The 'simple' tasks ahead can be summarised as follows.

- Some refinements could be made as to the terminology of the ESG.
- Further clarification is needed in relation to the difference and "weight" of standards and guidelines respectively, especially from the point of view of current and prospective future decisions on compliance with the ESG (ENQA membership applications, and the planned European Register), e.g. the appeals procedure is suggested in 3.7 among the guidelines. Is it then a requirement to be met for "substantial" compliance?
- The operationalisation of the standards and guidelines would be very useful. This could also be facilitated by providing examples of evidence for making self-evaluations and compliance judgements easier and more objective.
- Regular advice could be provided in an organised way to both HEIs and agencies (and, possibly, governments?) as to the implementation of the ESG, presenting the major challenges and examples of good practice. This could be a little more than organising various meetings and workshops.
- As a closely related activity, regular feedback should be collected as to the experience of HEIs, agencies and national governments with the implementation of the ESG.

Beyond the "simple" tasks above, there are some other considerations worth noting.

- There are still some uncertainties as to the interpretation of standards. Are they simply reference points or well defined norms to be followed? Should they be interpreted in a relative or in an absolute way? The ESG document itself emphasises the relative interpretation, saying that "In both the Standards and

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[5] See for example the study by the Nordic Network of QA Agencies: Tue Vinther-Jørgensen, Signe Ploug Hansen (eds.), European Standards and Guidelines in a Nordic Perspective. Joint Nordic Project 2005–2006. ENQA Occasional Papers 11, Helsinki, 2006. http://www.enqa.eu/files/nordic_v02.pdf

the Guidelines, the report prefers the generic principle to the specific requirement."[6] Clear enough.

- But then how can we interpret 'compliance' (even 'substantial' compliance) with the ESG? If the standards themselves are relative i.e. contextual, context-dependent, then how can consistent decisions be made as to the compliance with the standards? (ENQA membership, European Register.) Is compliance to be different regarding different HEIs, agencies, and countries in Europe? What is acceptable in relation to a certain country is not acceptable in relation to another one? Do the ESG really mean this?

- Considering all of the above, how should we proceed with the intended European Register of Quality Assurance Agencies? How will the prospective Register Committee defend its decisions on inclusion of individual agencies in the Register? Will a rejected agency be happy with the reasons of the decision stating e.g. that the selection of the Head / President / CEO of the agency by the minister of education is not acceptable from the point of view of independence of the agency while, based on the relative interpretation, the 'reference points' principle, an agency operating in another country will be accepted in spite of having the same feature? How will the prospective Appeals Committee deal with such problems?

At this point it is useful perhaps, to remind us to some 'basics of life' and quality assurance in general.

- There are no 'perfect' systems in higher education in the world. HEIs and agencies are far from being perfect in any sense of the word. It is hard to believe that there are HEIs and/or agencies or national QA systems meeting all the standards and guidelines of the ESG to 100 %. There is always room for improvement, regarding any actual organisational setup or operational activity. Even 'substantial' compliance to the ESG is difficult to define and to judge in a really objective, reliable and, for the entities

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[6] Standards and Guidelines for Quality Assurance in the European Higher Education Area, p.10., italics added. http://www.enqa.eu/files/ENQA%20Bergen%20Report.pdf

- involved, in an acceptable (!) way.
- Moreover, continuous improvement is a basic principle of quality assurance.
- Having all the above in mind, what can we say about the possible operationalisation of the ESG, which is badly needed for well-based and sound decisions on compliance? A formal way out could be defining the minimum level ("threshold") of compliance. That could involve also creating scales and/or grades in relation to the individual standards (and guidelines?). But this, intended or not, clearly would mean an accreditation of the QA agencies on the European level.

Yes, the bad news is this: although the majority of those involved in working out the ESG did not intend to establish and introduce an overall European accreditation scheme for QA agencies, what they did is exactly this.

The two major characteristics of accreditation are:
- there is a predetermined (and usually public) set of criteria (or "reference points") against which compliance is judged and, on this basis
- a decision is made.

(And no, it is not relevant here that the exercise is compulsory or not. Examples for both voluntary and compulsory accreditation schemes exist in Europe and worldwide.)

Predefined criteria and making a decision. That is exactly what ENQA currently practices when deciding on the membership application of agencies and this is what is intended with the European Register on even a possibly wider scale.

Is this really the only way forward? Or is there another way to choose?

Additional information is available on the HAC's website at www.mab.hu/english/index.html

3.4. Quality Assurance in Germany's Higher Education Institutions – A Perspective from Within

Professor Dr Ilse Helbrecht, University of Bremen

1. Introduction: A paradox

Teaching, learning and research at German higher education institutions are facing a number of challenges. Whereas in Great Britain the concern of quality assurance in higher education was accompanied by a strong political will that was substantiated by a government programme to increase (financial, intellectual, structural) investment in education, the German situation looks like an almost complete inversion. The debates about quality assurance in Germany's higher education institutions are situated in the midst of turbulent discussions between universities and politicians: Since the early 1980s students, teachers and researchers in Germany have been confronted with unsustainable financial conditions and – in spite of great political rhetorics on the importance of education and knowledge – a lack of thorough political support and sound political actions. Therefore, improvements in quality assurance are expected at times of parsimony and shrinking room for manoeuvre.

Who raises the issue of quality assurance in German universities has, thus, to consider this specific background. Speaking from a perspective within a German higher education institution (being vice-rector of the University of Bremen), I am absolutely convinced that we do need an intense debate about quality enhancement in higher education. Yet, I am also certain that we do need a realistic debate, too. And realism teaches us to consider carefully the circumstances and profoundness of the situation. A realistic perspective on quality assurance in German higher education institutions is, henceforth, facing a paradox:

- Yes: we do need quality assurance procedures at German higher education institutions, very much indeed.
- No: we don't need bureaucratic approaches towards quality assurance in higher education, because that might soon be throwing out the baby with the bathwater.

If we analyse the current state of our national debates on quality assurance it might be wise to consider a great concern. The sad fact is that we are perhaps in danger of destroying the very quality of teaching that we try to foster through quality assurance. How to sustain such a paradoxical thesis? And how to construct and built a fruitful pathway out of that dilemma?

2. The situation: A black box

The "European Standards and Guidelines on Quality Assurance" make a distinction between three different levels of quality assurance:

1. external quality assurance (e.g. programme accreditation)
2. peer review of quality assurance agencies and (e.g. national register)
3. internal quality assurance (e.g. in Germany …? A black box!)

Whereas 1) external quality assurance (programme accreditation) and 2) peer reviews of quality assurance agencies (national register) are highly standardised routines in Germany that are being performed on a thorough level of professionalisation and transparency, the third level of quality assurance (3. the internal quality assurance) still suffers from a lack of transparency. To this day, internal quality assurance systems at German universities are rarely transparent for outsiders; to most of them they are a black box. Given that every German university has unique routines to secure the quality of each study programme, the competence of the teaching personnel, and the student services provided, it is still barely professionally debated, in which ways exactly the quality of teaching and learning is assured and enhanced in German universities and universities of Applied Sciences.

Therefore, internal quality assurance in Germany is a highly intimate business of each and every single German university. There are neither scant national standards nor common debates on such standards. Though there might be sound rationales for this situation – one being that the enhancement of quality assurance belongs to the precious realm of university autonomy – I would still like to argue that the real challenge

for German higher education institutions lies in this very field of quality assurance, the internal quality assurance of each and every institution.

So yes, I am pro quality enhancement. And I am positive about the necessity to move forward in Germany in this third field of quality assurance. The university I stand for (University of Bremen) has, thus, partaken in a national model project organised and financed by the German Rectors' Conference and the Federal Ministry of Education and Research. In this national model project, called 'process quality' (Prozessqualität), the invention of a German model of internal quality assurance for teaching and learning was at stake. This project has just ended in fall 2006. And I will not have the time here to present any results in detail. But I do want to stress that this is a much needed first move by some *Länder* (federal states), some universities (Bayreuth, Bremen) and universities of Applied Sciences (Erfurt, Münster) towards a systematic internal quality assurance in Germany. In line with this model project the accreditation council (Akkreditierungsrat), as well, is steadily moving towards discussing an internal quality assurance system in Germany that might be part of the accreditation system.

Nevertheless, it is still difficult for external partners – be it the state or international partner universities or organisations like the European University Association (EUA) – to understand and rumble the internal quality assurance in German universities. Therefore, I would suggest that internal quality assurance in German HEIs can by and until now be associated with a "black box".

3. Perspectives

Currently, there is an intense debate in Germany on possible national standards for 'process accreditation' (Prozessakkreditierung) as a new way of accreditation in Germany. This so called 'process accreditation' could help establish and foster internal quality assurance systems. Yet, the question is still open: what is quality in higher education? Who preserves the quality of teaching? And with which methods, instruments and strategies; can university leaders encourage the enhancement of teaching and learning quality on their campus?

The transformation of teaching: Who preserves quality – and how?	
old academia	new managerialism
• individual ethos	• institutional responsibility
• informal communication	• formal procedures
• personal approach	• standardisation
• teacher-student interaction	• manager-teacher-student interaction
• individual (departmental) culture	• institutional quality assurance

Figure 1: The transformation of teaching (design: I.H.)

The European debates about quality assurance are probably – especially in the United Kingdom – much more advanced than in Germany. Yet, the timewise advancement does not necessary mean that British or Scottish or Irish approaches towards quality assurance systems provide the proper answer to the German situation. Especially one concern that has also been discussed in the international arena might apply to the German situation: the concern that with a transformation of teaching under a new managerialism we do gain more transparency, standards, and control – yet we are also in danger of more bureaucracy, more streamlining, and more disengagement of the individual teacher.

Could it be possible that we creating a new paradox?
- Because the more institutional routines we establish perhaps the less individual responsibility we get for teaching?
- Perhaps the more administrative procedures and routines we demand from our faculty members the less motivation and interest we harvest?
- Thus, through the introduction of institutional quality assurance the biggest threat we might create is the erosion of quality culture (academic ethos).

Especially given the complex German situation with low tuition fees, high teaching loads and an unfavourable faculty-student-ratio, the intrinsic motivation of researchers and teachers at the universities is the biggest and most fragile resource. Therefore, when we think about establishing quality assurance systems in every faculty and every study programme at

the University of Bremen – and we are well on our way – what the rectorate is most attentive to and mindful watching is the perception of a quality culture lived through and by the academic staff. Because the main thesis on the quality of teaching in Bremen is: front-line academics are the real makers and shapers of teaching quality! Thus, it is them whom we have to convince of our idea of an institutional quality assurance and integrate into the standards and procedures.

4. The Bremen model

The idea of teaching quality itself is a highly contested concept. Teaching quality has multiple meanings to multiple people. Neither teachers, nor students, nor university leaders, nor politicians, nor employers or employees would easily agree upon what exactly defines the quality of teaching or the quality of competences students need to acquire. Therefore, creating up spaces for debate on various possible qualities of teaching and learning is immensely fruitful and precious for an academic institution. At the University of Bremen we are convinced that the quality of teaching on our campus can only be measured troublesome and fragmentary in a way by indicators or evaluations. Of course, we do collect measures. And yes, we build indicators. And certainly, we evaluate the teaching on campus.

Yet, at centre stage is a policy of enhancing the quality culture on the campus. Quality culture is dependent upon the intensity and fruitfulness of communicative routines on the campus. Why, when, how and with which results do faculty members, students and staff interact and communicate with each other? How good are the faculty members in each study programme and the university administration in contact? And what are the issues that are at stake on the various levels and forms of communication? Are all important issues being covered and thought through?

In the Bremen model of quality assurance the heart of achieving a living institutional quality culture pulsates with the implementation of a quality circle in every study programme. With such a quality circle we are hoping to advance systematically the objectives, practices and results of our programmes.
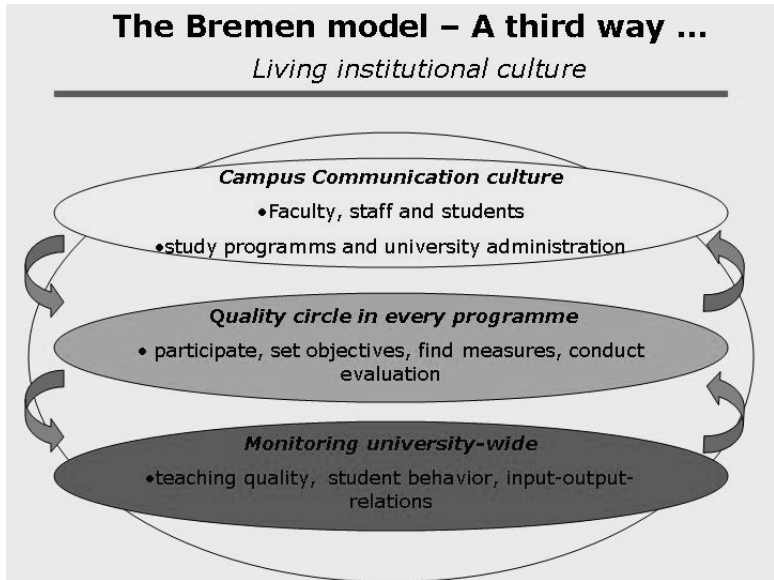
Figure 2: The Bremen model of quality assurance (design: I.H.)

5. Conclusion

There are rival conceptions of quality assurance in higher education. And there are various national situations in Europe that make the standardisation of quality assurance difficult.

Speaking from a German perspective within a university, the dramatic mismatch between inaccurate state funding on one hand and growing societal demands on the other hand puts all universities and universities of applied sciences in a difficult position. Quality assurance systems are very much needed in Germany. Yet, the real circumstances for introducing them are characterised by shrinking resources, i.e. educating more students with fewer personnel.

Therefore, it is all the more important to find ways and systems of internal quality assurance in Germany that focus on the continuing interactions between teachers and students as the cornerstone of excellent teaching and learning. The very nature and substance of internal quality assurance must take this central relationship into focus.

Abstract management routines within bureaucratic quality assurance systems that neglect the centrality of teacher-student-interactions are in danger of discouraging students and teachers likewise. We need quality managers – but only of a certain type. We need those administrative experts and quality enhancing professionals that help us to carefully establish a quality circle in every study programme. The implementation of the quality circle has to go along with an institutional policy that bears in mind that campus communication culture is the bedrock of academic quality (teaching and research). This trail, this "Bremen model", might open up a third pathway between old academia and new managerialism – a fruitful way towards the enhancement of quality culture in Germany's higher education institutions.

Fostering teaching quality in European Higher Education Institutions (HEI)	
Strengthen:	Preserve:
• Institutional and individual responsibility	• European standardisation of quality concepts and policies
• Embedding quality culture in national systems	• European register
• European debates as professional discourse arenas	• Control of learning outcomes

Figure 3: Fostering teaching quality in European HEIs

3.5. The Employers' Perspective
Dr Christoph Anz, BMW Group

The success of the BMW Group depends on our employees. To be better than our competitors we have to attract the best students, the best graduates and the best young professionals. Therefore we have different strategies to get in contact with students and with higher education institutions. For us it is very important to know what kind of study programmes are offered by the different higher education institutions – and what kind of quality these programmes have. At the same time we try to give information about the needed skills and competences within the BMW Group. Both students and professors ought to know what kind of competences, skills and qualifications are needed to get a job and an attractive career-path at our company.

We need a competitive higher education system with an outstanding quality of both research and teaching. Within a more and more global world this competition of higher education regarding study programmes is getting more and more intense. It is more or less the same situation we as a company have to face: To be successful and to be able to hold a leading position within a global market our products have to be the best. Also the products of higher education institutions, their study programmes, have to be the best or at least as good as possible.

Therefore quality assurance is crucial for both the world of industry and for higher education institutions. For us, for industry this is no new idea; quality assurance systems are a prerequisite for being successful. For higher education institutions the idea of an external review system is a rather new one – at least in Germany. The implementation of such a form of quality assurance and the establishment of several accreditation agencies was supported right from the beginning by our company. We think that it is very important to support higher education institutions in their struggle for better quality.

Even more important for us is the aspect of transparency. We need reliable information about the contents and about the quality of study programmes – and the system of quality assurance we now have established in Germany is a good provider of transparent information – at least in principle. In practice the world is slightly different.

After several years of active engagement regarding the implementation of the accreditation system in Germany and within different processes of accreditation we have a lot of questions whether or not we are doing the right things. The overall question is: Do we get any added value out of this form of quality assurance? – I would like to answer this question from two different points of view.

On the one hand we have the overarching political aspects and arguments. Of course it is very important to implement a new and reliable form of quality assurance which helps each higher education institution to improve the quality of their programmes. At European level it is a prerequisite to implement a system that is comparable and compatible all over the European Higher Education Area. This positive decision was taken several years ago and since that time ENQA has developed the "European Standards and Guidelines". So it seems to be a rather successful process and a rather fast one as well.

At national level the accreditation is – compared with our former instrument of quality assurance – almost a revolution. The implementation of external peer reviews with students and practitioners participating was a radically new form of quality assurance. We are now discussing the further development of our instrument. The interest of our company is to change the programme-oriented form of accreditation into a more process-oriented form.

We are convinced that such a form of accreditation gives additional information to the persons responsible for quality within each higher education institution. If you take into account the internal processes in addition to the contents of the study programmes you are able to change the processes which are crucial for excellent quality not only of study

programmes but also of other relevant aspects. So within the higher education institution the added value is even larger and more useful than using the programme-oriented form of accreditation.

To give a first concrete answer to the question of added value: Quality assurance in the form of external peer review provides very useful information for the higher education institution. And if the institution takes this information seriously, we are in a very important process of change and increasing quality. So there definitely is an added value.

But coming from outside and trying to recruit the best graduates for our company we need different information or additional information. We have to know whether or not the graduate is employable. This is the most important and most relevant information about a study programme. Employability is – at least from our point of view – a combination of technical training in the relevant field of study, practical training in the real world of industry and several soft skills. As long as our form of quality assurance does not provide information about this crucial target, our recruiters and Human Resources managers do not get any added value.

What is missing is a reliable set of criteria regarding the quality of study programmes in regard to employability. No, that´s not true! – To be honest, we already have such a set of criteria, but my impression is that most of the higher education institutions don't take them into account.

Several years ago the employers' side in Germany has developed a catalogue of criteria regarding employability and how to use these criteria within the accreditation process. This catalogue was meant as a first attempt to describe how to evaluate this very important aspect. Some of the accreditation agencies have taken this catalogue into account. But there was no response from the higher education institutions which are responsible to ensure that their graduates are employable.

What kind of criteria are we talking about? Just to give you some examples I would like to mention the most important ones: Was there any form of integration of practice during the phase of design and implementation of the study course? And – even more important – is there an integration of practice in teaching and research as well? Is there a clear, transparent and relevant definition of vocational fields aimed at – both regarding science, administration and business? How is it being guaranteed that the students receive an insight of the relevant vocational field? Are internships obligatory and how long do they last?

Furthermore, each study programme should teach different soft skills. What kind of soft skills that might be depends on the vocational fields desired – but even for a successful career of a scientist these are crucial. I would like to mention the following:
- team-competences;
- presentation and feedback-techniques;
- creativity and flexibility in the use of knowledge;
- entrepreneurial thinking and acting;
- intercultural understanding;
- ability to continuous learning.

I entirely agree that it is very important to develop common standards and guidelines for quality assurance both at national and European level. But what has been developed so far is just a framework. What we need as soon as possible are reliable and transparent criteria what we mean by quality. And these criteria have to ensure that the whole procedure is providing an added value for all, for higher education institutions as well as for students and employers.

One of the most important prerequisites for a successful development and implementation of criteria is transparency. We need transparency during the whole process. Otherwise we won´t be able to establish any form of trust in the system of quality assurance. As an example I would like to mention the intense debate about the so called European register. From our point of view, this debate has nothing to do with quality and how to ensure quality within the European Higher Education Area. It is

an academic or political discussion about the question who might be the most influential party in the game. I think we should focus on the important issues – and to increase the quality of higher education is really important.

How to manage quality assurance and how to ensure that quality assurance agencies are trustworthy are of course relevant issues in the whole process. But I can imagine other forms of control at European level than to establish a register. We already have several networks and co-operations with clearly defined quality standards. Why do we need more? Essential is the transparency of those networks regarding their own quality standards and the criteria they use.

As long as transparency is guaranteed we don´t need any form of monopolising in quality assurance in Europe. I think diversity and variety are better, for then we will have more competition and this will contribute to a continuous improvement of quality assurance. Our common aim should be to ensure that quality assurance is a lively process, run at every higher education institution and involving every relevant partner, including employers.

What I tried to show in this presentation is the importance of employable graduates. I think it´s very simple. Companies need employable graduates and therefore they are willing to support higher education institutions to reach that objective. Industry is even willing to participate in the complex system of quality assurance, is willing to expand the engagement in accreditation. – But if the results are not sufficient we might try to get the relevant information by other activities. In that case we will focus on those institutions and agencies providing the information we need.

But to be honest: We would definitely prefer that our system of accreditation changes into a form of quality assurance where all partners – and I think higher education institutions, ministries and companies are partners in this process – can be sure that they all get an added value. And employability of graduates should be our common interest.

What we still have to do is to ensure that this common objective is reviewed by the processes of quality assurance and that the results become transparent.

4. Contributions to the Workshops

4.1. Developing Quality in the Knowledge Society

Dr Andrée Sursock, European Universtiy Association

1. Introduction

Quality assurance processes were developed during the industrial era in order to ensure the quality of manufactured products. Although QA methodologies in higher education have been adapted to the sector's specific needs, they have nevertheless remained somewhat anchored in the industrial age. When they examine educational or research products in a linear way, they fail to capture the transactional nature of education and research. The current emphasis on developing QA standards reflects this industrial approach.

With the emergence of the knowledge society, it may be opportune to question the philosophical underpinnings of current QA methodologies. If knowledge creation and dissemination are more fundamentally processes inscribed in relationships rather than products, what kinds of QA procedures are needed to foster higher levels of knowledge?

2. The policy context

The combined requirements of creating a European knowledge society and promoting the Bologna Process constitute central challenges for Europe. In both cases, quality is seen as essential to achieve these objectives.

A consensus has emerged among all key policy actors – including higher education institutions – on the role that these institutions can and should play in these processes. This aspiration implies vesting greater responsibilities in higher education institutions and should translate into improved strategic leadership and management, in part through the development of an institutional quality culture. It is in this way that higher education institutions will justify and expand their autonomy and

increase their credibility. Thus, the challenge for higher education institutions is to take the lead in order to ensure that academic rather than bureaucratic principles and values are respected and the processes correctly implemented.

3. The institutional level: Enhancing internal quality

It is clear that all higher education institutions, however good their teaching and research activities, experience challenges that are shared across Europe. These challenges require robust internal decision-making processes and a quality culture.

The Quality Culture Project, funded by the Socrates Programme, is one of the responses that EUA devised to increase the capacity of universities to meet the accountability needs and the heightened demands upon higher education to deliver more, with greater levels of quality, despite diminishing resources.

The choice of title – 'Quality Culture' – was deliberate. When speaking of quality, it is easy to revert back to such managerial concepts as quality control, quality mechanisms, quality management, etc. These concepts, however, are not neutral. They convey a technocratic and top-down approach that will only backfire in academic settings. By definition, academics are successful 'knowledge professionals' who are committed to excellence and dislike being managed. Therefore, the term 'culture' was chosen to convey a connotation of quality as a shared value and a collective responsibility for all members of an institution, including students and administrative staff.

Quality culture signals the need to ensure a grass-root adhesion, to develop a compact within the academic community through effective community building, as well as a change in values, attitude and behaviour within an institution. It points to the importance of the rectoral team in creating appropriate conditions for the academic community to deliver quality provision and to the attention that must be paid to developing an agreed institutional profile, the identification to the institution of all of its members, and clearly defined and agreed

objectives and strategies to meet them.

How to develop and embed a quality culture? What are the lessons learned in the EUA's Quality Culture Project? The project formed networks that included about 120 institutions from over 30 countries and drew the following conclusions:

-   In terms of culture, it is important to promote shared values and attitudes – rather than simply managerial processes. This implies building a university community by strengthening the staff's identification with the institution and introducing staff development schemes in order to ensure that internal quality processes are an opportunity to improve rather than punish. There is no single way of developing internal quality processes: the specific internal and external environments of each institution must be taken into account. Each institution should organise its internal review to fit its own objectives and be coherent with its own academic and organisational values. At the same time, each must balance these against national external accountability requirements.
-   In terms of processes, there should be no bureaucratic, uniform or mechanistic internal quality processes but processes adapted to specific activities. The cycles and scope of internal evaluations should be linked, in a pragmatic and cost-effective way, to the strategic and the external evaluation cycles of each institution. Attention should be paid to the global picture that emerges through the internal evaluation of the different components, and the internal processes must promote creativity and innovation.
-   In terms of actors, it is important to engage students and alumni, academic and administrative staff. The role of leadership consists in communicating the need for these processes, framing them in consultation with the campus community, and using their results in the strategic cycle.
-   In terms of data, institutions must ensure central data collection and analysis to measure institutional performance.

- In terms of structure, quality units are now standard in many institutions. It is important to ensure their academic staffing in order to avoid over-bureaucratisation.
- In terms of inter-institutional co-operation, the national conferences of rectors must play an important role in negotiating with the national authorities and accreditation agencies the scope of internal and external evaluation processes and of institutional autonomy. The link between autonomy and internal quality is fundamental. The Trends IV report confirmed the findings of the Quality Culture Project: the greater the institutional autonomy, the more robust are the internal quality processes.

4. The national level: Enhancing external accountability procedures

The external quality processes need to take into account the combined requirements of the Bologna Process and Lisbon agenda and ensure that external accountability measures are useful in promoting creative and innovative institutions, both in their teaching and in research.

5. The European level: Promoting the development of a European dimension for quality assurance

European discussions about the development of a European dimension for quality assurance started in September 2001 and are ongoing. The E4 group, which gathers representatives from ENQA, ESIB, EUA and EURASHE, has developed the text on "European Standards and Guidelines for Quality Assurance in the European Higher Education Area", which was adopted by Ministers in Bergen.

These Standards and Guidelines should not be taken as a compliance list but as principles for the internal and external quality processes. The E4 is currently discussing the possibility of developing a register of QA agencies operating in Europe. Inclusion in the register would be based on an external review of the agencies. The register would enable institutions to select a QA agency, if this is possible within their national legal framework. This possibility has been enshrined in a European Parliament

and Council Recommendation agreed in 2006.

6. The QA Forum: A shared understanding of quality

The emphasis on creativity and innovation in higher education points to the importance of adopting a 'knowledge society' approach to academia, based on an understanding that quality in higher education is essentially a reflection of the quality of relationships – between students and teachers and among researchers – and that the role of HEIs leadership is to ensure that all the preconditions are met within the institution to enhance these relationships.

The fundamental role that institutions play in quality was acknowledged in the Berlin and Bergen Communiqués. This acknowledgement should not be interpreted narrowly as leading to a division of labour: with the QA community in charge of external accountability and HEIS of internal quality. On the contrary, it should be based on a partnership between the HE and QA communities – both at national and European level – based on a commitment to promote vibrant academic community.

It is for this purpose that the E4 group co-organised the first European QA Forum (23 – 25 November 2006) in Munich to discuss internal quality processes in the light of the Bergen Communiqué. It is anticipated that this event will become an annual one and follow closely European policy developments.

4.2. The Role of the National Levels referring to Quality Assurance Institutions

Dr Ir. Guy Aelterman, Nederlands-Vlaamse Accreditatie Organisatie (NVAO)

Introduction

One of the major objectives of the Bologna declaration was to create a European Higher Education Area and to further academic and professional mobility. Although the agenda was educational, there were aspects on economic development and expectations in it as well. If we say mobility, this implicitly means recognition of qualifications.

Bologna tools

To realise these Bologna objectives, the Ministers gave us a set of wonderful tools:

- Create the same qualification structure for the whole of Europe;
- Promote the development of a sustainable quality assurance system all over Europe.

Hence, we created the bachelor/master qualification structure and – mostly national – quality assurance agencies to ensure good quality of programmes and institutions on the national and international level. The key factor and the only option to further academic and professional mobility is the external supervision of assurance agencies to ensure quality in higher education.

Before Bologna

We all know that quality assurance did not start with the Bologna declaration, but was already in place since the early sixties of the last century. The modern approach towards quality assurance started after World War II, in a period when the European cohesion was not as strong as it is today and the European idea was only beginning to grow. Quality assurance developed much stronger on the national level than on the European level. Therefore, different quality assurance systems were applied in several countries.

Bologna implementation

Furthermore, we need to take into account that the implementation of Bologna implies:
- that it has to be translated into national legislation;
- that this does not take place at the same pace in all countries;
- nor does it take place in the same way.

As a consequence, the way quality assurance systems are developed may differ considerably between countries, which manifests itself in the chosen quality assurance system and in the aims and objectives, the topics, the general focus and the evaluation methodology that are adopted.

The picture mentioned below and borrowed from Lee Harvey is a perfect illustration of the enormous variety in external assessment models.

Approach	accreditation	audit	assessment	external ex
Object	provider	programme	learner	output

Focus	govern-anace & regulation	curriculum design	learning experience	medium of delivery	student support
	content of program-mes	financial viability	qualifi-cation	admin support	organis-ational processes

Rationale	accountability	control	compliance	improvement
Methods	Self-assessment	PIs	peer visit	inspection
	document analysis	stakeholder surveys	direct intervention	proxy dlegate

(Systems of external evaluation, Lee Harvey)

The differences can be found on the level of approach, output, focus, rationale and methods. The external assessment can be limited to programme assessment as is the case with NVAO, a combination of programme and professional assessment as we see in the CTI approach or can be an institutional assessment.

Berlin communiqué (2003)

Taking into account the different systems in Europe on quality assurance and the consequences that this may have on the development and creation of an European Higher Education Area, Ministers decided in Berlin (2003) to develop a set of standards and guidelines to enable the different countries and quality assurance agencies to harmonise quality assurance systems.

Bergen communiqué (2005)

This leads us to the Bergen communiqué in which the Ministers of Education agreed upon a set of tools to put in force the view and pathway to a European Higher Education Area:

- An overarching framework derived from the Dublin descriptors. This framework sets down the outcome levels for all masters and bachelors. This tool is extremely important for the realisation of a European Higher Education Area and more specifically for the mutual recognition objectives;
- Standards and Guidelines for quality assurance (ESG) at the level of the institutions, the external assessment and the assessment agency were accepted. Those ESG are generic, applicable on programme and institutional evaluations and in line with those used in other international networks such as INQAAHE;
- The principles of a European Register for Quality Assurance Agencies;
- And finally, for the first time, mutual recognition was explicitly mentioned in a Bologna follow-up communiqué.

ESG

However, the implementation of the ESG leads to discussions about some tricky points:

- What do we mean by independence?
    - on the level of the panel composition;
    - in the production of a panel report;
    - and in the final decision-making (who decides);
    - the question of independence directly and indirectly concerns human resources.

How public do reports need to be and what is the underlying meaning of the different levels of publicity applied by the agencies?

- The complete report as well as the final decision (NVAO);
- Only the positive decisions, including the report (OAQ);
- Only decision with summarised conclusions and recommendations (some German agencies);
- Only an assessment report but not the final decision (VLIR);
- Only mention of accredited programmes or institutions (EFMD).
- Appeal
    - In Sweden, appeal is prohibited by law;
    - In the Netherlands and Flanders, there is an internal and external appeal.

We believe that the most logical approach is to take into account cultural and historical differences and to give agencies indications as to measures for improvements to be taken in account for the coming years.

Mutual recognition

Meeting the ESG means that we meet the quality criteria or standards on higher education shared within the European community of higher education. It is a guarantee for quality and therefore creates trust. However, this is only the first step towards mutual recognition. The final aim is the recognition of qualifications. An accreditation decision by a quality assurance agency cannot immediately lead to mutual recognition of qualifications; at the most it can lead to mutual recognition of the accreditation decision itself.

We need good procedures or at least guidelines to come to mutual recognition of accreditation decisions, we need to be explicit in what exactly we recognise, knowing that recognition of qualifications cannot be the task or competence of an QA agency.

What do we mean exactly by mutual recognition of accreditation decisions? In simple terms, it means that "If I, as agency A, were to implement the accreditation that agency B has implemented, I would achieve the same result."

To come to mutual recognition of accreditation decisions, we need to go through a step-by-step process,
- Analysis of mutual standards and procedures (a);
- Recognition of mutual standards and procedures (b);
- Recognition of results of assessments (c);
- Recognition of accreditation decisions (d).

Such process is certain to succeed provided that
- there is mutual trust between the cooperating agencies;
- people accept a certain diversity of criteria and procedures;
- people accept mutual verification of data and results.

This assumes that
- where necessary, national regulations must be amended;
- exchange and cooperation projects between the different accreditation or quality assessment agencies will be set up;
- networks of accreditation or quality assessment agencies will be developed.

The mutual recognition of accreditation decisions rather easily allows a statement to be made on the level of a programme (bachelor's or master's). The statement regarding the orientation of the programme (to what degree is the orientation academic or professional) and regarding the subject-/discipline-specific requirements will be more difficult to make.

Both the bachelor's and master's levels are clearly described in the Dublin descriptors or in the overarching qualification framework, both of which are widely accepted.

The following steps are more difficult to take. First of all, there is the aspect of programme orientation: the bachelor's and master's professional or academic orientation and to what degree a programme is embedded in research. The approaches of the different countries, usually

laid down in legislation, differ considerably. This has to do with the historical and/or cultural background, or the (national) reference frame according to which higher education is organised.

One has to conclude that the division into professional and academic qualifications as such is becoming untenable. The focus is more often on qualifications that are a mix of professional and academic orientation, the concept of research ranging from fundamental, via applied, to practice-based research. How then do we deal with orientation in international comparisons and in mutual recognitions? The answer is that this should be based on the comparison of competences acquired within the programme and validated by assessment and accreditation and possibly confirmed in a diploma supplement.

As to subject-/discipline-specific requirements, here we can use the same approach as for the programme orientation. A lot of projects try to determine the subject-/discipline-specific requirements on an international, i.e. European level: examples are projects like Tuning, EURACE, and Polyphonia. They can offer an appreciable help in the mutual recognition of qualifications.

Finally, the last step, namely the mutual recognition of qualifications is determined by the institutions themselves. Taking into account the Lisbon recognition convention (1997), mutual recognition of the accreditation decisions, diploma supplements and the task of the ENIC/NARIC's, the HEI take the final decision in recognising qualifications.

In the approach just mentioned, we always speak about academic recognitions. Professional recognitions are still more complicated. Those recognitions regulate the entrance into the labour market and are largely dependent on the competences of trade organisations, ministries of economic affairs, in other words, they are generally subject to national regulations, even economic protective measures.

The interaction between mutual recognition of accreditation decisions, the Lisbon convention, agreed multinational subject-/discipline specific competences and learning outcomes and European professional guidelines for entrance into the labour market should stimulate both academic as well as professional mobility.

4.3. Requirements for a System of internal Quality Assurance in Higher Education Institutions

Dr Uwe Schmidt, Johannes Gutenberg University Mainz

In accordance with the findings of the Bologna follow-up conference in Berlin, the European Standards and Guidelines in Quality Assurance lay down that the higher education institutions themselves are primarily responsible for quality assurance.[1]

This can be implemented by the institutions in different ways: On the one hand, it is to be expected that some institutions will be able to establish a comprehensive internal system of quality assurance independently. On the other hand, some institutions will only be capable of building up a rudimentary system due to lack of resources and will subsequently require the assistance of external agencies. This contingency is already covered by the European Standards and Guidelines insofar as the Guidelines differentiate between Standards applying to agencies and those applying to higher education institutions.[2]

It is, however, problematic that some of the Guidelines, especially those concerning procedural standards, are not as far-reaching as some of the standards already established in different European countries today. Therefore one could ask whether the Guidelines have defined anything substantially new apart from the formal requirements for the recognition of agencies. In part, this can be attributed to the inherent character of guidelines per se and, although it would be possible to make further critical remarks, it is not the topic of my presentation today.

Founded upon the central underlying question of this workshop my topic is: How can accreditation help to further the recognition of competences acquired in study programmes? I wish to illustrate certain aspects which are relevant for the establishment of an internal system of quality

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[1] http://www.hrk-bologna.de/bologna/de/download/dateien/Berliner_Kommunique.pdf
[2] http://www.enqa.eu/files/ENQA%20Bergen%20Report.pdf

assurance. By doing so, I will also offer my favourite answer to this central question: In the long run, the reciprocal recognition of study programmes will be succeeded by the comprehensive reciprocal recognition of higher education institutions and the quality standards which are adopted and practised within them. However, this can only lead to success in accordance with the concept of the European Standards and Guidelines, if the quality assurance systems of the institutions fulfil specific requirements.

Therefore, I will consider
- firstly, the common understanding of quality assurance in the context of both the development and the management of higher education institutions,
- subsequently, I will depict the structural requirements of an internal quality assurance system that I consider to be essential,
- and lastly, I will briefly report on the intention and status of the system accreditation project that is currently being carried out at Mainz University.

Due to space limitations only a cursory overview of the listed topics can be offered in this article.

1. Quality Assurance in the context of Higher Education
If one reads the Standards and Guidelines attentively, it becomes apparent that, for the most part, quality assurance is discussed without taking matters of the management and development of higher education institutions into closer consideration.

This is also the case in the current discussion elsewhere: Quality culture, quality circles or quality processes are often discussed, but there is very little mention of the connection between quality development and the development of higher education institutions or between quality development and the management of these institutions.

In German-speaking countries in the last few years, the discussion on the management of higher education institutions has been reduced to a few aspects.

Discussion points from the perspective of an autonomous higher education institution are: The strengthening of the position of the president and the respective deans, the installation of a governing body and at the same time the inefficiency of existing committees. In sum, one could put it positively and say that the management of higher education institutions is being strengthened by this view and being more closely tied to individual responsibility, thus also allowing a quicker implementation of decisions.

Regardless of one's assessment of this development and the decision-making structure that it implies, it is clear that it involves a high demand for current information that should be presented logically, viewed in a comprehensive manner and interpreted in a context adequate fashion. Due to the fact that all higher education institutions aim at high quality in all of their areas of activity, their direction inherently involves information and quality management, strength and weakness analyses and assessments. Inversely, quality development is dependent on having access to the relevant information of the management of the respective higher education institution in order to assess appropriately the decisions made and the general philosophy of that management, and be able to integrate this information into the quality development concept.

The aforementioned informational dependency notwithstanding, quality assurance and the management in higher education should also be independent of each other. To use a term from social systems theory one could denote this relationship as structural coupling or as relative autonomy of both "systems". While the management of higher education institutions has the aim of decision-making, quality development has to a great degree consultative and supportive function.

Experience in the field of evaluation – especially in the case of a formative approach to evaluation – has shown that the quality of strength-weakness-analyses depends to a high degree upon the amount of trust given to the proper use of data and especially to a relative decoupling of evaluation and resource allocation. On the other hand, management in higher education as decision-making body also constantly requires a certain amount of detachment.

In a general sense, one could therefore differentiate between a political-administrative function of management in higher education institutions and a technical function of quality development, which has the main task of gathering information analytically.

These requirements, i.e. the simultaneity of participating in matters of management without being an integral part of the management system, and the involvement in decision-making without losing the relative independence of the quality assurance system, lead to an especially difficult balancing act within the field of higher education. The European Standards and Guidelines emphasise this precarious position for external quality development agencies that should also be relatively independent of the respective higher education institution. However, the same also applies to internal systems of quality assurance.

2. The Center for Quality Assurance and Quality Development at the University of Mainz (ZQ)

At Mainz University this ambivalence has been solved structurally insofar as the Center of Quality Assurance and Development (ZQ) has the support of a senate committee concerning matters of general principle on the one hand, and on the other hand works in close co-ordination with the university management.

The important factor here is that ZQ is a scientific institution that is both free to decide on the type of data-gathering methods utilised, as well as being solely responsible for the usage of the respective findings from the quality development process.

Although ZQ does indeed act as chair in agreements, such as in agreements on action plans in the final phase of the evaluation process, it does not have any management or decision-making function.

The central prerequisite for relative autonomy of quality development is, therefore, the detachment from administration and a scientific approach to matters of evaluation and both quality as well as organisational development.

Organisational Embedding of ZQ
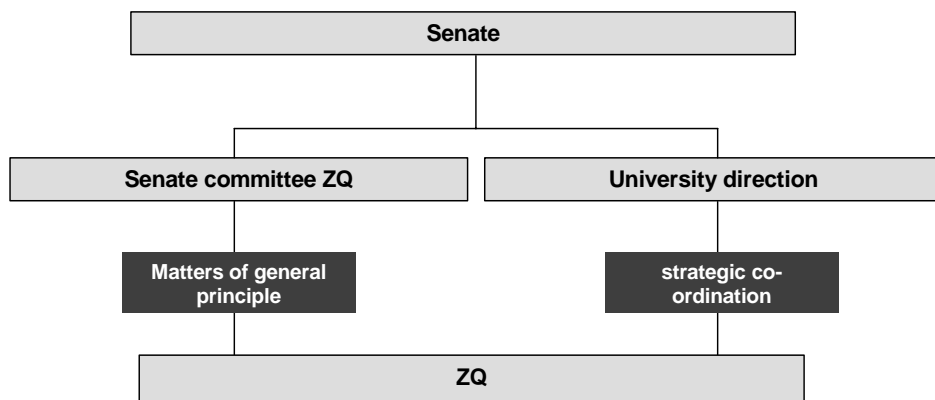
Figure 1: Organisational embedding of ZQ

The organisational approach I just presented is paralleled in ZQ's fields of work, and the cross-section of ZQ's activities also influences ZQ's internal status at Mainz University. Besides the evaluation of disciplines and university departments, ZQ's main fields of work are the promotion of young researchers, programme evaluation with an emphasis on pilots within the educational system, course evaluation via student surveys, alumni surveys, the implementation of research projects in the area of research in higher education, and the evaluative accompaniment of the establishment of new courses in the field of system accreditation.

Moreover, ZQ also acts as the administrative agency of the Network of Evaluation in Higher Education South-West, an association of 15 institutions of higher education.

Important factors contributing to ZQ's high reputation and the trust it inspires at the university are the carrying out of its own research projects and the participation of its employees in teaching. To evaluate teaching without teaching oneself or to evaluate research without researching, causes evaluation processes to become precarious.

Keeping abreast of current research topics avoids the notorious pitfall of evaluation being reduced to simplistic measurement. Instead, evaluation is enabled to explain cause-effect relationships.
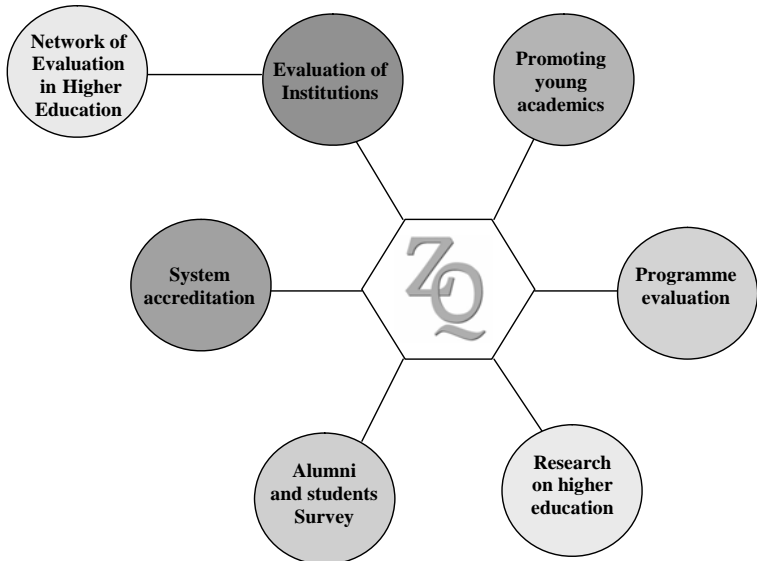
Figure 2: The Center for Quality assurance and Quality development: Fields of Work

3. The System Accreditation Project at the University of Mainz
Before going back to my initial question and giving a final summary, I'd like to remark briefly on the relatively new project in Mainz called System Accreditation. A rough programme regarding system accreditation had

already been developed at Mainz University more than two years ago. This was, however, shelved in favor of another project called "Process Accreditation".

In my opinion the findings of the latter project are ambivalent: On the one hand, the project obviously led to very important and pioneering internal developments within the four higher education institutions that participated. These developments would be best summarised by the term quality culture. On the other hand, the project showed that the concentration on processes alone is not sufficient; the respective structures of the institution must be taken into consideration.

This does not mean that institutions have to be rebuilt completely. Rather, one finds that there are positions within the institution where the relevant competences and the related fields of work are already present, such as controlling, Bologna representatives, and different forms of quality assurance and evaluation.

It is a first substantial step to co-ordinate these areas of work in a sensible and efficient manner. To define quality assurance not just in terms of processes, but also in terms of structures seems to be prudent, because quality development is not a purely technical system; people and their specific competences are an integral part of the equation. Therefore, quality assurance in higher education institutions cannot concentrate on gathering data and interpretation only; it must be an intelligent system of data interpretation, organisational development and consultation. Of course, we will develop a process handbook and measure process quality. However, when looking at the bigger picture, the aim of a pilot project is not only to describe and evaluate processes, but to evaluate the whole system of quality assurance and to have it accredited.

Furthermore, we believe it is crucial to consider different levels of quality and to look at structure and output quality besides process quality. It is vital that the levels of analysis are seen in correlation with one another; then it is possible, for instance, to gain causal explanations of effects at

the output level. The question is not whether or even how processes are organised, but which output they lead to.

The implementation process of study programmes is closely connected to the procedures of accreditation agencies and the recommendations of the Accreditation Council. Therefore, I will only illustrate two characteristics of our System Accreditation Project today:

Firstly, we are concerned to integrate external expertise as soon as possible, i.e. already during the conceptual development of the study programmes. We feel that this is an advantage because experts as consultants and specialists are already involved at a time when changes in the fundamental management of the study programme are more viable.

Secondly, we explicitly integrate matters of research quality. We feel that this factor is particularly crucial in the area of master programmes and also in the area of development processes in higher education.

Moreover, there are of course further modifications concerning particular processes and responsibilities. The pilot project is being accompanied by a scientific advisory board, which brings together renowned experts and institutions in the field of Quality Assurance.
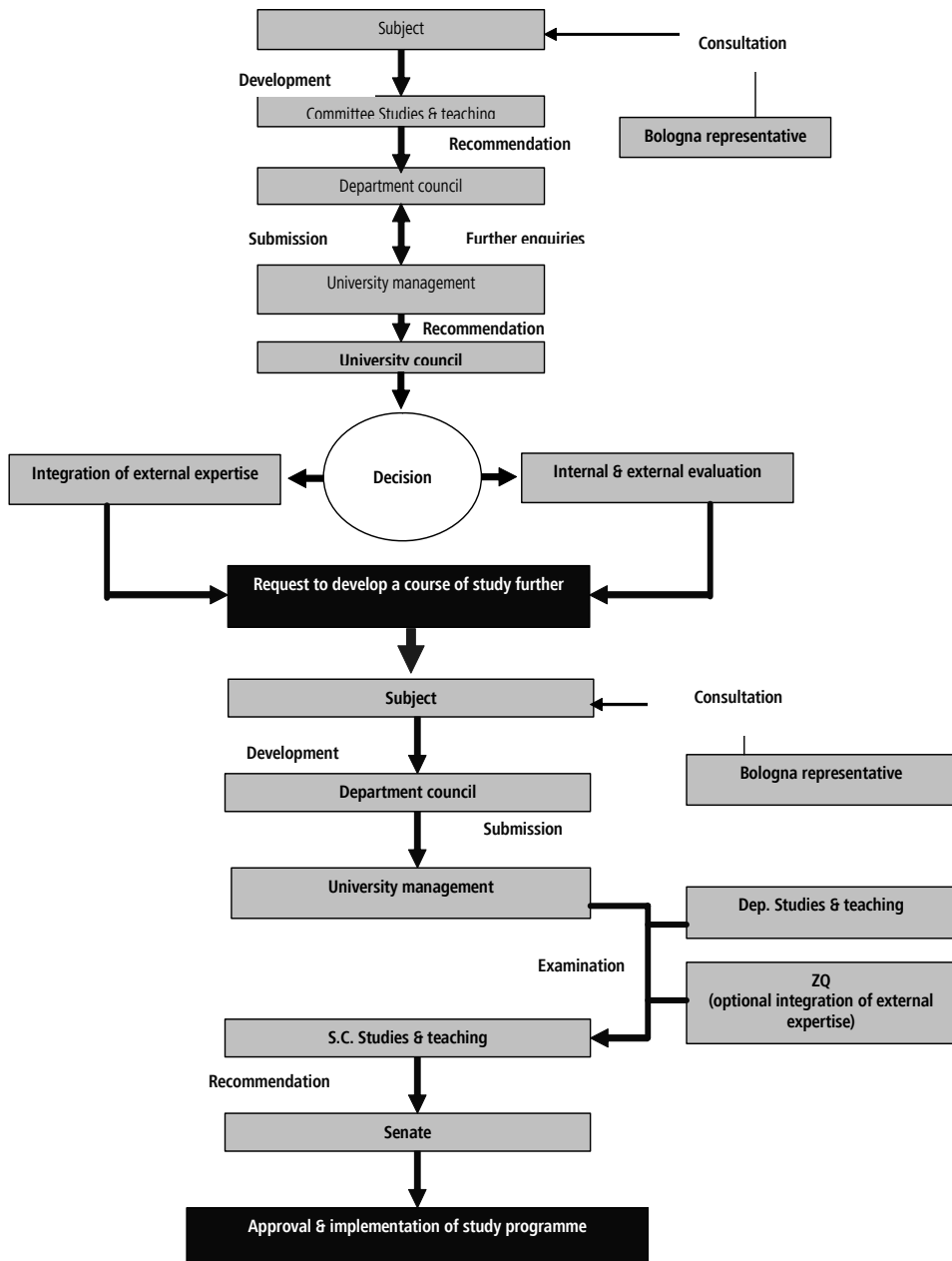
Figure 3: Concepts of a study programme

Finally, I would like to return to my initial question and offer a brief summary:

- The ideal of the Bologna Process to reciprocally recognise study programmes across borders cannot be accomplished by the laborious recognition of individual programmes. The reciprocal recognition of quality assurance systems of higher education institutions, however, can help to achieve this goal.
- Quality assurance in higher education cannot be defined in terms of processes only, but must also encompass structures as a means to build up the necessary expertise in quality assurance.
- Internal quality assurance systems require autonomy, especially regarding the methods employed. A sufficient overview of management processes without inherent leadership functions are essential.
- The System Accreditation Project shows a possible way forward to long-term reciprocal recognition of quality assurance systems between higher education institutions.

4.3. The Register of Quality Assurance Agencies

Bruno Curvale, Comité national d'evaluation, ENQA Vice President

Quality Assurance in Higher Education

The register of quality assurance agencies
An occasion for better European synergies (?)

Bruno CURVALE

Project Manager
Comité national d'évaluation, France

ENQA Vice President
(European Association for Quality Assurance in Higher Education)

National Academic Contact Point for QA
(Bologna Promoters)

Outlines of the presentation

☐ Foreword

☐ ENQA

☐ The register
  ■ The official order
  ■ The reasons behind the idea
  ■ The purposes of the register today
  ■ The situation before London 2007
  ■ The stakes (issues)

☐ A new context after London 2007
  ■ Some potential issues

Bruno Curvale, Berlin, 16th of February 2007

2

Foreword

- ☐ My vocabulary
  - ■ Evaluation: an organised process …
    - ☐ With different possible purposes
      - ■ Recommendations for improvement
      - ■ Judgement about reliability
      - ■ Accreditation
      - ■ Accountability
      - ■ Licensing
      - ■ State approval ("French habilitation")
      - ■ …
  - ■ Accreditation: a decision that engages the responsibility of the accreditation body towards society (students, stakeholders, …)
- ☐ My viewpoint
  - ■ A free speech
  - ■ … dialogue as the engine of progress

Bruno Curvale, Berlin, 16th of February 2007

3

The official order

In Bergen in May 2005, the ministers took stoke of the achievements and set the objectives of the next step:

" We adopt the standards and guidelines for quality assurance in the European Higher Education Area as proposed by ENQA. We commit ourselves to introducing the proposed model for peer review of quality assurance agencies on a national basis, while respecting the commonly accepted guidelines and criteria. **We welcome the principle of a European register of quality assurance agencies based on national review. We ask that the practicalities of implementation be further developed by ENQA in cooperation with EUA, EURASHE and ESIB with a report back to us through the Follow-up Group.** We underline the importance of cooperation between nationally recognised agencies with a view to enhancing the mutual recognition of accreditation or quality assurance decisions. "

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

The method:

Searching for a consensus among the E4 and making proposals to the BFUG

The deadline:

London May 2007

Bruno Curvale, Berlin, 16th of February 2007

4

ENQA

- □ What is ENQA?
  - ■ The European Association for Quality Assurance in Higher Education

- □ An association of QA agencies
  - ■ An open question: Why do we have QA agencies in Europe?
  - ■ Clarification of roles between State and universities
  - ■ Peer review as a corner stone

- □ The origin of ENQA
  - ■ EU recommendation (98/561/EC)

- □ The issues of ENQA
  - ■ To protect agencies ... (?)
  - ■ To develop the European dimension of QA
  - ■ To become a reliable partner within the E4 and the BP

Bruno Curvale, Berlin, 16th of February 2007

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The register: the reasons behind

An idea that emerged in 2003, took shape in 2005 and should be approved in 2007

- □ To protect HEIs against invasive QA agencies
  - ■ The balance between internal and external procedures;
  - ■ The balance between enhancement and control.

- □ A tool that will facilitate mutual recognition
  - ■ ... of accreditation results, degrees, ...
  - ■ ... and will make mobility easier.

- □ A way to clean up the accreditation market
  - ■ The risk of having accreditation mills, bogus agencies, operating in the EHEA;
  - ■ Stakeholders and "society" information issues.

Bruno Curvale, Berlin, 16th of February 2007

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The register: the purposes today

The Register will help to:

☐ promote student mobility by providing a basis for the increase of trust among the higher education institutions;

☐ reduce opportunities for "accreditation mills" to gain credibility;

☐ provide a basis for governments to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements;

☐ provide a means for the higher education institutions to choose between different agencies, if that is compatible with national arrangements;

☐ serve as an instrument to improve the quality of the quality assurance agencies and to promote mutual trust between them.

Bruno Curvale, Berlin, 16th of February 2007

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The present situation

☐ The E4 has reached a consensus that:
  ■ Preserves ENQA capacity to act as a political organisation;
  ■ Avoids the risks of duplication, competition, incoherence between ENQA and the register (link between ENQA membership and the register);
  ■ Ensures the independence of the Register Committee

☐ In brief:
  ■ The technical feasibility is demonstrated;
  ■ The political dimension of the question is under debate.

☐ It will be a new step for the Bologna process
  ■ Until now the process has produced tools for interrelations (BMD, ECTS, DS, ESG, …);
  ■ The register + the EU (2006/143/EC) recommendation are a first step in touching HE steering mechanisms.

Bruno Curvale, Berlin, 16th of February 2007

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That said, what are we taking about...

ENQA full membership | "would normally constitute prima facie evidence for" | Inclusion in the REHEQA

ENQA — Evaluation of the evaluation | Evaluation of the evaluation — Register Committee

Evaluation against ESG 3

External review
- "on a national basis"
- for ENQA membership
- "non national" for application to the Register

Agency — Procedures, "behaviour"

Purposes Q Standards

National regulations

Specific objectives

Bruno Curvale, Berlin, 16th of February 2007

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The register: the stakes (1)

Getting to the bottom of things

☐ The original proposal was an <u>inclusive information-based publication</u>;

☐ The project is now an exclusive list.
- The list of the agencies that fulfil the requirements of the ESG ;
- Not only the ENQA agencies but all the agencies that would like to operate in the EHEA.

→ **The register will be a kind of accreditation;**
→ **To some extent, it will be an assessment of national measures.**

Bruno Curvale, Berlin, 16th of February 2007

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The register: the stakes (2)

From theory to practicalities : the Register Committee will have a huge responsibility

☐ Compliance or substantial compliance with the ESG?
- Recognition shouldn't be automatic;
- A need to take into account specificities and localism, but how far?

☐ The nature of the decision is challenging
- The issue of independence
- The appeal procedure

→ The responsibility of the Register Committee will be important and might (will) have legal consequences;
→ The composition of the committee and the decision making processes will have to be fine tuned (and accepted by all).

Bruno Curvale, Berlin, 16th of February 2007

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A new context after London 2007

Some possible issues for the European QA dimension:

☐ A new dimension of the Bologna process:
- As regard the steering of HE (EU recommendation + register);

☐ The register: A license to practice abroad
- That will meet the needs of HEIs for:
  ☐ "image" (signs of communication);
  ☐ Independent assessments.
- The beginning of a competition between agencies.

☐ A dissociation between terms of reference and evaluation processes:
- States or decision makers being in charge of the definition of the terms of reference of evaluation;
- Agencies proposing their capacity to run independent procedures.

Bruno Curvale, Berlin, 16th of February 2007

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Bruno Curvale, Berlin, 16th of February 2007

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Inclusive grid proposed in Bergen (2005)

PROPOSED REGISTER STRUCTURE		Reviewed		Not reviewed
		Compliance with European Standards	Non-compliance with European Standards	
European national agencies	National operators			
	Cross-border operators			
European non-national agencies				
Extra-European agencies Operating in Europe				

Bruno Curvale, Berlin, 16th of February 2007

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5. Reports from the Workshops

5.1. Workshop 1:
The Role of the National Levels referring to the Standards and Guidelines for Quality Assurance
Séamus Puirséil

Working Group 1 discussed the role of the national levels referring to quality assurance institutions and had a very lively and useful discussion. Encapsulating that into ten minutes is impossible and so I will endeavour to do it in two minutes.

- Andrée Sursock gave a general background of the Bologna Process in terms of quality assurance. We had an outline of the quality culture project with a particular emphasis on the importance of creating the culture of quality in institutions.
- We moved on to look at the Standards, rather than the Standards and Guidelines I have to add, but the Standards from the European Standards and Guidelines for institutions, i.e. the section 1 of the Standards and Guidelines.
- The cultural differences between institutions and particularly cultural differences between countries engaged the group.
- We also discussed the question of learning outcomes and the fact that that these have not become embedded as yet in the higher education system in many countries throughout Europe although they are very relevant to quality assurance and to that quality culture.
- It was the view of the group that the greater the degree of acceptance of the concept of learning outcomes, of a quality culture and of ownership of quality by the institution the less need there would be for an intrusive approach to external quality assurance.
- It was stated that the standard on student assessment had not been operated in any meaningful way in a large number of

institutions.

- We had an outline of some of the results of the Trends V project and some discussion on whether cultural and external regulations are preventing an internal quality system.

5.2. Workshop 2:
The Role of the National Levels referring to Quality Assurance Institutions
Thierry Malan

I am to report on Team 2 which dealt with the role of national levels referring to quality assurance institutions. We first had a general presentation of the set of problems related to the European Standards and Guidelines, focusing on the most problematic issues concerning independence. It is necessary to achieve the right balance between governments and higher education institutions and also, for internal evaluation, within the institution between its administration and the various departments in charge of teaching and research. A second difficult issue was the publication of reports, and finally a last issue discussed was the envisaged appeals procedures. There were also ideas that the open Standards and Guidelines are a first step, a generic step in developing a quality assurance culture. A second step should come with the contractualisation of these European Standards and Guidelines within the culture of every country. So this quality assurance process is a step by step process including mutual recognition of standards and procedures and of assessments, the most difficult issue being the recognition of decisions by other agencies. It was stressed that in the quality development movement joint degrees, double degrees, the creation of efficient institutional, thematic and disciplinary networks need to have more importance.

Then we had a very detailed and stimulating presentation of the quality centre of the Johannes Gutenberg Mainz University. The focus of this presentation by Dr Uwe Schmidt was on the principal aspect of the concern for quality in the Bologna Process; that higher education institutions are the first ones responsible for their quality assurance. This focuses very clearly on a formative approach of quality assurance, meaning for instance that there must be some relative disconnecting of the evaluation and resource allocation. This model of the quality assurance system within Mainz University includes programme

evaluation, system accreditation and focusses on instruments like alumni and student surveys. Important aspects of this process ought to be research on higher education, knowledge of the university about itself and about its processes and results and above all making use of this knowledge, for instance in promoting staff and especially young academics.

In the debate that followed these two presentations the important issue was that the European Standards and Guidelines are not enough if they are not embedded in a quality culture that is to be integrated by all stakeholders of the higher education institutions, whereby all missions and functions of the university have to be taken into consideration. Some quotations by participants: "If we are good, we know it already, so why do we need an external evaluation?" and "If accreditation has to help us to do things we could not do before, how shall we be able to recognise that this accreditation will help us to do it?" Or, coming from a Higher Education Institution labelled as an excellence university, "Is it really useful to have an agency telling us what we already know? And is this agency good enough to tell us what we already know and help us to improve it?"

So it was stressed in the discussion that there is a necessity to take into consideration all missions of universities, not only research, but also teaching functions and also the general services and educational mission that this university has towards society. The idea was that the quality assurance process and European Standards and Guidelines will lead to the consolidation of a movement of differentiation between higher education institutions. The evaluation tools and processes will have to be adapted to the consideration of these different missions.

At the end of the discussion, an important issue brought up by several participants was the idea that one of the most important aspects of quality assurance is its ability of integrating staff development in the results of quality assurance and making it the most important tool in implementing its recommendations. It was brought to mind that the shift from teaching to learning was rather an old movement, older than the

Bologna Process. The Bologna Process consolidated this movement by focusing on learning outcomes and competencies as compared with a pure input approach. An example was given of an application for a post which would include evidence provided by the candidates that they had followed some kind of staff development courses. There was also insistence on the creation and development of staff development centres to improve learning and teaching and focus on problem-oriented teaching.

I would like to conclude with a personal remark. Yesterday there were quite a number of fine British quotations so I shall try not to make a new one but only a transposition of a British quotation. You all know the famous quotation by George Orwell that in a society based on a principle of equality some are more equal than others. Though transparency is a very interesting objective, we have to be aware that some will be more transparent than others.

5.3. Workshop 3:
Synergy and Subsidiarity - National and
European Levels of Quality Assurance
Bastian Baumann

I have the pleasure of acting as a rapporteur in the Working Group No. 3, or Team No. 3 which had as the topic "Synergy and Subsidiarity – national and European levels of quality assurance" and mainly dealt with the issue of the proposed register for quality assurance agencies in Europe. We started off by having a presentation by Bruno Curvale from the French CNE and also active in ENQA but rather giving his personal views, not ENQA views as I have understood him, on the latest developments of the register. It covered issues about the purposes of the register, some of the technicalities of the register, some issues for consideration for the London Summit in May this year.

We had quite a lot of discussions and there were many clarifications concerning issues that were discussed before. Due to time constraints we were not able to discuss all matters associated with the register but who can assume we would be able to do this in one and a half hours whereas the E4 group has been dealing with this for one and a half years or even more. Nevertheless all the discussions I think were very useful and also necessary because there were and are lots of rumours about the register around, some of which also were put forward in yesterday's presentations and I think the workshop helped to sort out some of these issues and also made it a bit more clear what the actual intention of the register is.

So, we tried to have this dialogue and, as Bruno Curvale put it, dialogue is the engine of progress and also the leading theme of this workshop. We started discussing or explaining the reasons behind the register and some of the reasons behind the register would be facilitated recognition, improved student mobility, the possibility for higher education institutions to choose an agency which best fits their needs and demands for having some kind of quality assurance, to improve the quality of

quality assurance agencies in general, to try to avoid or make it a bit clearer, to clean up the accreditation market and get rid of accreditation mills as far as possible. Based on these reasons behind the register, which changed slightly between 2003, 2005 and 2007, but are still the guiding principles, we then moved on to the current proposal put forward by the E4 group, i.e. ENQA, ESIB, the EUA and EURASHE. And this proposal is to have an exclusive list of quality assurance agencies that prove to fulfil or comply with the European Standards and Guidelines. The initial proposal was to have an inclusive list, so just a general listing of all agencies that are operating in Europe, but now the current proposal by the E4 group is an exclusive list. So, agencies have to comply with the European Standards and Guidelines and that covers all agencies, so not just very general agencies but also subject-specific agencies, or also agencies that are already transnational or regional ones. The register is supposed to cover or to include all types of agencies.

There might be different ways of proving that there is a compliance with the European Standards and Guidelines. The normal route would be that there is a national review of an agency and that national review has to take into account whether an agency fulfils or complies with the European Standards and Guidelines. However there might be situations where there is no national review, especially in small countries (Luxembourg, Malta) that also might not want to have a national review for financial or other reasons. So there are also other ways of trying to prove that compliance, and one other option that was mentioned are the ENQA reviews that are carried out. These reviews should make clear that an agency complies with the European Standards and Guidelines.

Then the Register Committee comes into play that is supposed to evaluate those evaluations or reviews, and has to check whether the review that was undertaken makes it sufficiently clear than an agency complies with the European Standards and Guidelines or not. Based on that evaluation of the evaluation a decision is taken by the Register Committee to include an agency in the register or not. In that respect it was stressed a couple of times that the independence of the register Committee is of crucial importance. The current proposal for the register

Committee is that it would be made up more or less as a mirroring structure to the Bologna Follow-up Group so you have full members and you have observer members. The full members would be appointed by the E4 organisations and by the social partners and you would have observing members representing governments, probably elected by the Bologna Follow-up Group, any successor organisation, or one might think of other ways.

There was quite a big discussion on the market issue. First of all it has to be stressed that there already is a market for quality assurance in Europe. That market is not caused by the register as well as issues connected to the market are not solved. There might be other issues such as GATS (General Agreement on Trade in Services), such as the Bolkestein Directive, such as national regulations which actually open up for the market. But the register itself is not a tool that actually creates the market.

The register, however, could be used for market purposes, so institutions might actually want to use the register or agencies included in the register for marketing purposes. And the current proposal from the E4 also does not foresee to create a free market as was originally foreseen in the draft recommendations of the European Commission on quality assurance. So the role of national authorities is not undermined by the current proposal of the E4, because it is the national regulations which decide what are the formal consequences for an agency to operate in that respect of country, but also what are the formal consequences of the decision of an agency. Having an institution being quality-assured by an agency does not mean that there will necessarily be connected some financial strings to this. But this is up to national regulation and the register therefore does not take away any of the responsibility of the national level, nor any of the decision power of the national level. For example in the German context where an agency has to be accredited by the German Accreditation Council, that national regulation is not taken away by the register.

There are no direct legal implications to being in the register or not. There might be indirect legal implications because some countries might decide to put up regulations that would encompass a decision with regard to being included in the register, and there are already proposals on the table, but this is again a matter to be decided at the national level. One last point that was raised was the financial implications or legal implications when it comes to agencies not being happy with a decision that was taken by the register committee, so suing the register and it was stressed that every effort should be made in order to minimise the possibility for litigation issues at the European level. By not having direct legal implications at the European level, but rather putting this issue up for national legislation, agencies would have to sue at the national level.

6. Plenary Discussion

Recommendations for the London Communiqué

Sir Roderick Floud, Vice-President of EUA
Koen Geven, Chairperson of ESIB
Dr Birger Hendriks, Chair of the Bologna Follow Up Group
Peter Williams, President of ENQA

Chair:
Dr Christiane Gaehtgens, Secretary General, German Rectors' Conference

Christiane Gaehtgens

As we sit here, I think we feel the burden of responsibility again on our shoulders because time is short until we reach the London Convention and the task to come up with recommendations is a serious one. This conference started very much with the stakeholders' perspective and I feel that we should return to a stakeholders' perspective again. That is, in the sense of stakeholders taking responsibility in the process of quality assurance in its various aspects and in shaping this process. It is therefore my great pleasure to welcome very high-ranking and knowledgeable representatives of these important stakeholder groups. Koen Geven of ESIB, the students' representative; Peter Williams whom you all know as president of ENQA; Professor Sir Roderick Floud whom you also know as vice president of EUA and Dr Birger Hendriks as chair of the Bologna Follow-up Group, in this role here and in many other functions known to us in Germany.

Much talk has been given on how to make quality assurance operational and functional. The last presentation in particular gave us a view of the importance that we need to attach to detail. This detail includes how to shape a register and how to shape interaction between the national and the European level and between agencies and universities.

But I would like to remind us that it is not only about formality, about creating a structure that works but it is also about involving all those that have a part and bear responsibility in those processes. It is mainly academia that we are touching upon when we are discussing quality assurance. When we are talking about quality assurance, we are addressing the quality of teaching, the quality of courses and degrees that students receive at a university; the quality of internal management that universities stand for and of enabling universities to do this. At the end of this conference, thus, we should be aware of the fact that when structures, service organisations, agencies and the role of the state are concerned, we are empowering those who are at the centre of what university and higher education is about: teaching, research, institutions. I think we can't repeat that often enough.

When we start this discussion, we should begin with the expectations and the role that students take in quality assurance or higher education nationally within Europe. My first question would be to the representative of ESIB. I think it is important that you remind us of how students perceive the change that has taken place in the course of the Bologna reform. Considering the introduction of quality assurance and the fact that we talk about structures at the one hand and outcome and competencies on the other hand which are much more difficult to assess: How would you, on a very general note, assess the situation that students now find when entering universities? How far did we get with quality assurance in the interest of higher education for students? Where are the biggest, so to speak construction sites? Where do we need to focus for the future from your point of view?

Koen Geven

That is a very provoking question I would say. Hopefully I can also give a provoking answer. Let me start with questioning if quality assurance is always linked to quality improvement. Maybe that is an important issue because what is quality improvement about in the end? It is about improving teaching, or maybe we should not speak any more about teaching, but about learning. Still, improving teaching would be one of the major points to improve quality. We have to think about new ways of better conditions without budget cuts. All these kinds of things have a direct impact on what we would see as learners in the institutions. Another major issue for example is the issue of student/teacher ratios. We have seen increased student/teacher ratios in the past and we would like to see them reduced. I think these would be major improvements in quality, of course linked to an increase in finances. Quality improvement does happen locally first of all and is one of the main issues that should be addressed.

The next major issue in terms of procedures and process is that we as the students are actually involved in quality assurance processes and can voice our opinion on what is going on inside our universities. Unfortunately we have not seen such an increase in our powers in universities to take decisions related to quality. We rather saw a

decrease. On a national level, although we have been attempting to enter into quality assurance procedures, we have not become full participants in the quality assurance process as pointed out by Lee Harvey yesterday. We are rather treated as consumers although we would like to be participants in this process and be for instance members of governing boards of accreditation institutes.

However, on the European level there has been a nice improvement. This conference shows that we are actually part of this table and part of this group. So, on the more general level, we are happy that we have been able to find a consensus as a group called E4. In this group we are putting forward a system which is unique in the sense that it puts learners, teachers, universities and quality assurance agencies at the core of what we are doing and are enabling them to govern a system which would be called a register.

Christiane Gaehtgens
Well, thank you. Can I focus a little more on the actual reform process that is taking place? The Bologna reform was mainly meant to help internationalise higher education. But it is also and maybe even more so a process of international reform that helps us improve our national structures and, in a university, the structures of teaching. This will probably not be perceived in the same ways in all countries, particularly not in countries that have the Bologna structure, Bachelor or Master, already in place. Still, when we talk about quality for students, we are touching on compatibility and legibility of degrees. We address international recognition. We also consider the feasibility and practicability of actually entering into new programmes and moving on. Where would you see the main area of improvement, in a wider sense of quality assurance? Is there a main concern – compatibility for example, international recognition within Europe, or do you rather see problems that are based within individual universities?

Koen Geven
This is both a sense of national legislation and actual practice. It is maybe even a process of European legislation since we all know that the Lisbon

Recognition Convention - which was actually proposed before the Bologna Process started - is something that is being implemented or should be implemented at a national level. However, our main concern is also what is actually happening with the Lisbon Recognition Convention when it comes to institutions.

At a recent seminar in Riga on the issue of the recognition of the Bologna Process a very interesting point was mentioned. It proposed to move on more on the process of the recognition of degrees because we have not seen such a significant increase in recognition procedures. Even within one single country it can be a huge problem to get the time you study at a different university assessed, and also internationally this is still a major problem. If you are, for instance, going to study in Eastern Europe no Dutch university would say that you actually did something useful because Eastern European universities are not perceived as being good enough. And that is something that we have to tackle on the institutional and maybe even lower levels. One of the ideas was also to include recognition procedures in quality assurance procedures because if recognition is so much linked to quality, then maybe we should include it in this discussion. It was one of the points mentioned at the seminar in Riga. This is one of the interesting new things I saw coming out of the Bologna Process and that would be a challenge to take up.

Christiane Gaehtgens
Right, that's certainly the role for international accreditation or for compatibility of accreditation. Thank you for reminding us that quality assurance at any rate is no substitute for sufficient funding. I think that this is essential when we talk about quality in a general sense and as a general responsibility towards the higher education system. Adequate funding at all levels is important and I would like to take that as a first result again and I know myself in line with the EUA recommendations for strong universities in Europe which focused very much on that.

Roderick, representing European universities at this panel, I know you are very aware of the fact that when we address accreditation and threshold standards, we attend only to a small bit of the actual task of quality

management within universities. We also face the risk of formalising and distancing ourselves by doing so from the actual challenge that quality management or quality culture would put it, means for the universities themselves. How do we bridge that gap?

Sir Roderick Floud

Before I answer your question I will try to answer very briefly to Jürgen Kohler's question yesterday. He asked what is behind the proposals that we have been talking about, and if I had to produce a single answer to that: It would be the expansion of universities. It is the fact that we have moved in Europe over the past 25, 30 years from an elite system to a mass system of higher education. That movement is behind so many different things that have happened to the university systems and to the processes of regulation in the university systems. It has affected the workings of individual institutions; it has affected the systems, the funding and the attitude of governments to the university system.

We are now responsible for the education of 40% of the young people of the European continent and for a substantial and an increasing proportion of the continuing life-long learning in the European continent. So we are important and one of the consequences of importance is that you have to be particularly keen to demonstrate that you are providing the service that society is expecting. Therefore I think the overall context, which I will always come back to, is one of extraordinarily rapid change and extraordinarily rapid growth in higher education over the past 25 years.

Now one of the major relations of that to the issues that we are talking about is that essentially when higher education was for the elite, you could have informal systems in such areas as quality assurance. People knew each other. When we only had two or three universities in England, then everybody knew each other and could trust each other. When we have close to 150 universities in the UK, which is the case in the moment, then those informal systems essentially break down. They break down within the institution because institutions are now so big that you often do not know who your colleagues are in other parts of the university. You

need to have more formal systems of making sure that they are doing a good job for the university because it reflects on you if they do not and anyway because you are interested in the reputation and quality of the university. As we can see there are good internal reasons why you need more formal processes.

There are also good external reasons why you need more formal processes – because there are just so many institutions. Yesterday, Ian McKenna referred to one of our old processes: Why can't we have bilateral relationships between universities? Why do we need these overarching European processes? Well, London Metropolitan University has students now from 150 different countries. There are students from 150 different countries from every country of the European Union, probably from every country of the Bologna Process. We need, for our own purposes, to be able to know how we trust the quality of the institutions from which those students come. As our students also hopefully go out across Europe those other institutions that receive them also need quality. We need trust in the quality of what is produced. What we are seeing is the transformation from informal methods of trust in the university system to formal methods of trust which is due to the expansion of higher education. We can regret that but I think that it is inevitable.

It then comes down to the question of what are the processes for regulation. Here people have been producing English quotations. I will now produce a quotation in another language. „Quis custodiet ipsos custodes?" – "Who guards the guardians?" If there are to be formal methods of quality control across the whole of the European higher education area and across the university systems of those areas, then we have to be concerned about how those formal systems operate and who operates them and the quality of their operations. That is where the universities have an absolutely crucial interest in the correct, proper and efficient operation of quality assurance agencies. They are not a burden on us; they are a tool for us. We have to make sure that they are a tool that operates effectively and efficiently. And that is why I very strongly support (and I hope that the conference as a whole will support) the

recommendations that the E4 group have developed. For they leave the responsibility for quality control of the quality assurance agencies with those who should bear that responsibility – the institutions, the students, the social partners; and do not take that away to some other body. They do not take it away to governments and I think that is the important point about the register.

You can argue about issues of who is going to sue whom and in which courts and so on – it's a trivial issue in the sense that we can expect very, very little of that going on. The important issue is the universities, the higher education systems including the students and the social partners and the teachers retaining control of quality because it is in their interest to do so.

Christiane Gaehtgens
This is a very important point and we will ensure that we find it in the documentation and in the recommendations. I suspect one could put the building of trust through accountability of which you spoke as the central idea that drives quality assurance. I suppose there is another point which is competition through quality. Through quality that can be made visible, that can be documented through the result of accreditation, of individual programmes, possibly through various agencies in various countries, of accreditation, of quality assurance procedures and so on. How does that relate to each other? Trust building on the one hand and competition of accountable universities in an essentially more and more competitive system on the other hand?

Sir Roderick Floud
I have never really been terribly concerned about what is sometimes described as the increase in competition in university systems because ever since I have been in universities, I have lived in an intensely competitive atmosphere. There can be few more competitive groups of people in the world than researchers trying to get their ideas accepted, published and of course also tested. So it seems to me that the university is an intensely competitive system and that is competition in the service of higher quality. We believe in criticising each other, fiercely sometimes,

in order to produce better science and thus competition in the creation and transmission of knowledge seems to me to be just fundamental to what we do. Therefore I am not really worried about competition. It seems to me that it is in the nature of what we do.

I do think that you have to regulate the competition and that is where it comes back to what we are talking about: that unrestricted, unfair, illegitimate, misleading competition has to be dealt with. That is exactly the point about having effective quality assurance agencies: They can stop illegitimate competition. I can think that all of us in the search for students may sometimes make slightly exaggerated statements, we may produce pictures of our university which are taken from particular angles, put it that way, there are all kinds of marketing issues. But it is vital for the reputation of the universities that in a competitive situation you have people monitoring the competition. And that is what in my view the quality assurance agencies are there to do.

Christiane Gaehtgens
In an integrating, self-integrating or integrated European higher education area it seems that competition takes new forms because we are competitors increasingly and because we are learning from each other. I believe that is very important with some of the new countries in particular that very much hope for the implementation of our standards in order to enforce and develop their own system. At the same time obviously cooperation and competition are two sides of the same coin. I think we need to look at that and I wonder whether students would actually vote with their feet for the attractiveness of universities on the basis of accreditation results. I would like to know whether we need to shape accreditation, quality assurance at that level in order to meet those requirements for students. It is furthermore relevant whether we are talking about something that is very abstracted and administrative. What do you think about that?

Koen Geven
Well, the first question I would ask: Do we want students to vote with their feet? Because if we would link the financing, for example, to

student numbers and student populations, the effects on the quality of education can be basically cut. We are actually setting up a cooperative model of increasing quality by doing quality assurance. We are doing so by involving everyone in the institution in the process of improving this quality. I think it would be awful if all the students just suddenly left and went somewhere else to study. The other question is of course: Will it work? I personally do not think it is working at the moment. I hope that students are going to move around more, but I am a bit sceptical about this because of the issues of recognition that I have just been addressing. Another factor is the housing situation or a family situation that students can be in. We ought to address the idea of mobility from a completely different perspective rather than from an institutional or perhaps a quality perspective. For us the idea of mobility is to learn something that one couldn't learn at home. To learn in a different culture, in a different university with a different perspective on what education is or what the content of an education programme can be about. Are there other paradigms in philosophy in Spain than in the Netherlands? To me that is an interesting question and I believe that should be the focus of that discussion. When it comes to competition versus cooperation it is an essential question to ask in the Bologna Process and in the higher education area. For what we are seeing at the moment is rather an increase in competition than an increase in cooperation on the European level.

That is admittedly perhaps a bit of a bold statement and maybe I cannot prove it but I would like to provoke you to disprove it. It was mentioned as a problem that the Bologna Process is at two speeds. But I do think the problem is also that we have a Bologna Process of two different worlds. And that means linking the Eastern European dimension to the Western European dimension. Is quality assurance only important for Western Europe? Is it only increasing the quality in Western Europe? What actually happens to Eastern Europe? I do not see a lot of participants from Eastern Europe here. What does it mean that we are talking here about a register for our sake and what does it mean for Serbian students or for Albanian students or their systems. I hope that we can actually engage more of these countries in our debate because the

Bologna Process is in the end about 45, soon to be 46 countries and not just 25.

Christiane Gaehtgens

So you are reminding us to put integration and cooperation before exclusion through competition. I think this is another result we should bear in mind when we think about how to shape quality assurance in the future. We should shape it as competition because only competition will improve the system but we should shape it as a competition that can be handled and that will not exclude part of the European Community. I believe this is a very important statement and to get that balance right will be a difficult challenge; to ask for those who are developing the system of quality assurance and of comparison and the instruments for comparison. I quite agree that competition is certainly an important aspect and students will vote with their feet. But at the same time quality and improving quality plays such an essential role for universities, as Roderick said, that we can encourage students to take into account the other aspects that come with mobility such as learning more about other countries, about other systems and developing further in that context.

We are setting the goals very high and I wonder how realistic that is. It was already said that we are based very much on our national perspectives at the moment. We improve quality in national contexts, we have accreditation in those contexts. But how do we take the step, Birger Hendriks, from those national systems and the national responsibility that lies with the state to trusting other systems, to trusting universities, to trusting agencies in other functions? And then to Peter from ENQA to see how this can be operated on a European level indeed?

Birger Hendriks

I wish I had an answer. I think in the Bologna Process we move on the trace of competition, of cooperation and of cultural diversity, and what we want to create is mobility or the frame for more mobility in this context. The Bologna Process is something which combines all three. We want to guarantee the cultural diversity in each country and we want to create more cooperation but at the same time we know that we need at

least common basic standards and one of them is, of course, quality and quality assurance. Mobility within the Bologna Process ist built on the cornerstone of quality assurance. It is indeed relying on mutual reliability itself, and mutual reliability requires a sufficient system of quality and quality assurance in each and every country. We are trying to develop a guarantee system as a basis to rely on when a foreign agency is coming up with an accreditation. And what is the frame of reliability? We need certain standards for this accreditation, and the European Standards and Guidelines have been elaborated by members of the Bologna Process to this end. Thus, we have the Standards and Guidelines as basic common standards which are not guaranteeing the best quality ever but which should guarantee the basic standards. So we can create reliability not only at universities but also in their quality in the quality assurance system.

Christiane Gaehtgens

We have got it all settled and we have got it all right. We have agreed more or less on the European Standards and Guidelines that you refer to now as sensible ways of shaping accreditation and quality assurance. In most of our countries we have established a system of accreditation agencies that manage and monitor this process. We agree among our states that our education systems should become compatible and that students should move around in Europe and still it does not work, not even in joint degree programmes. Even though we know all this already we find it most difficult to get double accreditation and we find it almost impossible (even between Italy and Germany, for instance) to accredit a single programme in just one of the countries. But if we all know this and if we agree so far, where are the actual stumbling blocks? Is it that the trust between institutions and between states that Roderick has been talking about is so difficult to establish that we need to think about totally different and new means of actually bringing that trust in? Do we need to do this by agreeing on systems of quality assurance or do we have to define every individual item and criterion on this?

Birger Hendriks
10 years ago, at least we in Germany did not have any discussions at all about quality or quality assurance. We have progressed very far to discuss that now at the national and at the European level. I am convinced that discussion and competition create more quality. I think you are right: The system of quality assurance agencies by itself will not guarantee a sufficient frame of quality. Quality depends on the financial frames or other conditions, legal conditions for example, or cultural conditions, on the competitive position. But this institutional frame of quality assurance is one step to more quality. Sometimes you need someone as an observer to enhance the quality of the system.

Christiane Gaehtgens
This defines the role of the state as that of an enabler and observer, reminding us of what Roderick said earlier: that it is important for governments to play this role but not to take responsibility for the actual quality process away from universities. Now Peter, here we are and we need to talk shop and get the details right. I think we agree basically on the general agenda, that we need a common framework. We want to encourage both competition and cooperation and we need to share responsibility for quality, but the tricky bit is on how and where do we share responsibility in order to be able to trust each other.

Peter Williams
Yes, it is difficult. We are faced with all kinds of difficulties. Some are going to be quite easy to solve and others are going to be quite difficult to solve. First of all we have to recognise that we do not have a common understanding of what the word quality means. We are all talking about this word and yet we are all probably using it in 150 different ways in this room itself. And if we do not have a shared operational meaning for the word, then the words quality assurance compound the difficulty.

The problem with quality assurance is that there is a belief in some quarters that it is the heart of all problems. But of course it is not. In many cases it is the beginning of a lot of problems. We really have to define our terms. The difficulty with Bologna is that the solutions were

arrived at before the questions were asked and so we are being faced since 1999 with a series of structures. Many of these structures are very good and imply things we might do, but they were designed as answers to a set of questions. Those questions were never explored fully before the answers were delivered and in that case we have to implement the answers. That is how we have got ourselves into a bit of a problem.

When it comes to looking at quality assurance we can probably divide it into two types of quality assurance. One is top-down bureaucratising quality assurance which is all about formalisation; I hope not too much standardisation. It is about doing things in particular ways or delivering particular pre-determined requirements. Then there is professionalising quality assurance. That is quality assurance which is about developing a careful and attentive consciousness in the part of all those who are involved in the process and the transactions of learning. That is the teachers, the support staff, everybody who is involved, and the students, anybody who is involved in the process of helping students to learn better, more effectively and advantageously. It means that everything that is done by people in higher education is directed towards that end.

That implies changing the way we think as individuals and changing the way we operate so that we do not just see quality assurance and higher education as a personal self-indulgence. It is in fact a collective and personal responsibility which involves personal responsibilities. And if we can move towards that professionalising approach, then the bureaucracy inevitably becomes lighter or at least it should do so. Finally, what bureaucracy is left, is left to help the collective endeavour work better.

Now those are very - in a sense - idealistic ideas about what quality is and what quality assurance should be. But what we have got is a series of bureaucratic structures and what we must make sure is that they are actually doing something useful. Which does suggest to me that we have to look very carefully at what there is and ask ourselves: Do we need all this? What in all the things we are doing is useful, what is helping everybody in this collective endeavour, and what can we jettison? Already within the 10 years of the Bologna Process, I fear we are creating

bureaucracies which are not necessarily adding any obvious value. I think for institutions there is an expectation that they should demonstrate their responsibility, or accountability. That responsibility means they have to know what is going on in their name. They also have to know what is being provided in their name to students, and only if we can encourage institutions to take on that responsibility we are going to achieve anything of greater value. At the same time, we have to be careful not to dehumanise or disempower the academic community.

So we have got to constantly keep our eye on what we are trying to do and how we can improve it. But we should not simply get fixated on processes and procedures that are not examined for their usefulness and effectiveness. It is really about everybody taking responsibility. It is about everybody sharing in a common endeavour from the first year's student (in fact before they arrive in the university) to the point at which they graduate. Quality and quality assurance, as has often been said, is not a destination, it is a journey. We are never going to get there; we must always be trying as best we can.

Christiane Gaehtgens

That is something we have agreed on and which would be a good basis for discussion with the floor which I would open very soon. I see there is a comment from Roderick.

Sir Roderick Floud

I would just like to follow that up slightly. Of course I think we all accept or we should all accept that quality assurance systems are a necessary but not a sufficient condition of improving quality in a higher education. That is we have to have them but they do not provide all the answers and we should not even pretend that they do. It seems to me that there are plenty of other things that universities should be concerned about in terms of enhancing quality. We have heard about the EUA quality culture project. We heard about such work as is going on in the University of Bremen yesterday. I think there are other systems level issues that university systems should be considering and thinking about. One of the oddest aspects of university teaching, given that we are in the whole

business of teaching and learning, is the lack of proper training for university teachers. We assume that because we are good at doing research therefore we can teach. That is not true. And we have all seen many, many examples where it is not true. So I think if we are going to move the focus from quality assurance to quality enhancement we should begin to think about the professionalisation of the university teaching profession. We demand that our doctors and dentists and nurses and teachers are accredited and properly trained by us. Isn't it very odd that we do not demand the university teachers are properly trained and accredited by us?

Christiane Gaehtgens

I profess a strong commitment on the side of HRK to quality enhancement and quality management and I promise you future conferences on that. But I would like to come down to the nitty-gritty. Peter said that we need to move from a formalised to a professionalised approach. And that we need to develop quality assurance institutionally that will, I may take it further, enable us in institutions and at state level all over Europe to trust the documented result of a quality assurance process in each of those countries and in each of those universities. Now this is about as ambitious as we can get and maybe it is impossible. The question I would like to ask first when we talk about the register as being one of the formalised approaches of building a framework in which trust can become reality, even over the wide range of institutions and systems that we have: Are we asking too much? It was said, and this may not be a politically very correct question but I think it is an essential one: Is an approach like that of a register actually feasible when we talk about such a diversity of institutions and systems within Europe? How detailed does a formalised and state-regulated approach need to be compared to or related to the responsibility of institutions and which universities are represented, that is, academically driven, in order to make this operational?

Peter Williams

In the last two days there has been a lot of discussion about the register. But I think there is a danger in creating a monster out of this register. The

register is a relatively small and unimportant part of the scene. It is not at the heart of what either the European dimension of quality assurance or what individual countries or institutions will be about. We hope it will be of use. And we mustn't make a big deal out of it. We will try our best to do it properly and effective. But at the end of the day as they say, this is not going to impact very greatly on what students or teachers are doing on a day-to-day basis as they go about their work in higher education. So it'll be one of many things that one needs to bear in mind.

We have to be careful and see the danger of building the register up too much. We shouldn't devote too much energy and effort into the register, in order to face other things that are probably more important. So I would say in terms of the register, let us do it as well as we can. If it is not useful we either do something else or we revise it. But give it a chance; see if it provides anything and if it does, fine. Let us not get fixated on this register, which after all is only a website. In fact it is a list with probably 60 names on it. That's all. And as a list with 60 names on it, I don't think we should get too troubled by it.

Christiane Gaehtgens
I think there is more expectation behind that which is that it will provide information. That it will spare us further consideration and effort in deciding on whether to recognise decisions that have been taken by an agency in another country, and that is quite a step to take.

Peter Williams
But let us look at the circumstances in which recognition needs to be made. There are very limited numbers of purposes for which you would need to use a register for. And if it provides that information, then fine. But we should be careful not to ignore other sources of information. They may not be the most efficient, but they do exist. We are not going to create some brand new way of inventing something called student mobility through this register. There are ways of doing it already; we are already running joint degrees and dual degrees. We are learning from our experience. The register may help in this, but it's not the answer to all known problems.

Birger Hendriks

The register may create more transparency in Europe. It should provide more information with a minimum of bureaucracy and a maximum of professionalism. I think that is very important. But of course we have to face the fact that we have already got a market of quality assurance which hasn't been seen as a danger sofar.

What we are talking about now is for example the question if the register will be a bottleneck for quality assurance agencies entering the European market. But apart from the fact that a register can provide reliable information, it will not guarantee more quality. We will have to observe if the register is developing a hierarchy or unofficial hierarchy of quality assurance agencies.

Koen Geven

There is something I want to add to Peter's statement: If we shouldn't take the register as the biggest thing happening in terms of student mobility, we should also not see it as the biggest thing in terms of the quality assurance market. It was pointed out clearly in the discussion during our workshop this morning, that there is already a quality assurance market and that this is not a development or a process we are happy with. We actually see that it would be very important to have public standards and some keeping sense of public responsibility also for quality assurance processes – I am sure that most of us at this table will agree. But that is a problem that we cannot solve within the register. The register is just providing information about what is already happening; and that information can be helpful for us. But what is happening on a quality assurance market can be regulated then by national legislation only.

The question "How can national levels react on decisions that a quality assurance agency from abroad has made?" remains for us to be discussed for example in the Bologna follow-up group or in the E4.

But let me emphasise another special approach of the register. The register is useful for transparency, building trust, mobility and so on. But it offers also a partnership approach! It is governed by both the leaders of the institutions and people on the ground and it includes the quality assurance agencies. That is something that we could also set as an example. An example for a broad exchange of methods and discussions about quality assurance processes through institutions at national but also at the European level. It would be very good to increase this partnership approach in other discussions on quality issues.

Christiane Gaehtgens
Thank you. I'd like the views and comments of the auditory now on how we could possibly develop such a framework that helps building a European higher education area, not a monster, like Peter said.

Peter Greisler
My name is Peter Greisler. I work in the German Ministry of Education and Research. I am very happy that some very important things have been said because I think it is very important that we have to be very generous in cooperation and that we have to be very strict in things like the register. I agree with Peter, the register is a small thing and compared with all the other things we are discussing in the Bologna Process it is not the most important thing. But if we do it, we should do it right and we should do it well.

I don't see any problems if there are 60 names on it. But what could happen is that there are 160 names on it and then we will have to find a way to disband it. So that is why we have to discuss the smaller things as well and we have to discuss the problems that could arise.

I also agree with what Roderick said: It's not the most important thing how the litigation works, but I think if we do it, we should do it well and we should find a way not to have all these problems and to keep it a small thing.

Christiane Gaehtgens

Yes, but we need to decide whether we want to make it legally binding or whether we can make it binding by good practice. We've seen that problem in Germany in our German accreditation system. I think we need to address this openly.

Koen Geven

Can we make something legally binding for 46 countries?

Christiane Gaehtgens

No, there we are. We invite further comments and then I'll take this back to the floor.

Lee Harvey,
Director of the Centre for Research and Evaluation of the Sheffield Hallam University

I'm afraid this is a statement as well, rather more than a question. But I think to some extent, what you chairs have been talking, is stratospheric. We and most people in higher education institutions, as teachers, researchers or students, wouldn't understand or engage in any of this at all. They would have very little interest in the European Standards and Guidelines, no interest in the register, however it materialises. They have enough trouble struggling with the ECTS system, as was pointed out, which has very rarely worked anyway. What they are interested in is the quality of what they get. They are not interested in quality assurance. Quality and quality assurance are different things.

What they are interested in, is moving from a formalised quality assurance to a professionalised quality assurance, actually I would say to a professionalised quality rather than quality assurance; and movement towards transformative learning in essence, to cut a long story short. And

that involves taking on a different focus on policy. Quality as transformation rather more than quality as fitness to purpose. I think quality as fitness to purpose has had its day, because essentially it's about accountability and about circumventing the notion of quality. It's not about encouraging engagement.

Roderick mentioned the need to think about quality enhancement and I think that is absolutely right. I would actually still like to call it quality improvement. It's very easy to enhance something by just taking it out of the cupboard and giving it a quick shine. It looks enhanced but it doesn't actually improve anything apart from the surface appearance. So I would still like to think about it as quality improvement which really should be the focus that we need to move towards. Professionalisation of quality for improvement purposes.

Christiane Gaehtgens

You're certainly right. I think we can all report that from our various backgrounds that there is a big gap between the general debate on these issues and the institutionalised debate on these issues. What is actually happening at the level of those universities that are doing the teaching and the research? This is one of the main concerns, I think, for all Rectors' Conferences. How do we get this idea of quality improvement operational at this level and how do we get this to become operational? But it is also a concern at state level even if we talk only about enabling and how we can move between the individual person and the individual responsibility within an institution to compatibility and accountability within one nation and beyond within Europe. And there is big discrepancy, I think, we all feel, between those two issues.

Jürgen Becker
Vice Rector of the University of Karlsruhe

I think we should really look now at the outcome for all of the parties. My question is, and I look especially to Mr. Hendriks, who will be one of our very important persons in London in a short time: Who is in charge that we gain access for our students not only to other universities in Europe but also to the U.S., the international industries, organisations like the

Washington Accord and so on? Can the register give a guarantee for that?

Birger Hendriks
I would like to make a remark from my point of view as somebody who works for the government. We do not guarantee the quality assurance or the quality of course but what we have to do is to work for the best conditions for higher education. To offer higher education institutions the frame for very good quality. And the rest is up to the higher education institutions.

Do we really need a frame of standards and organisations to look after the process of quality, quality discussion and so on? We see that there are some areas in Germany where the quality of higher education is not sufficient: We had long discussions about quality of training and education in the medicine sector, for example. The governments may set the frames or help the higher education institutions, but the higher education institutions themselves are the ones who have to guarantee their quality and they are the ones who have to do the work. In the Bologna Process we work on this frame. Nothing else. And we are elaborating a frame of cooperation. The Bologna Process cannot guarantee let's say recognition, but we can help to improve conditions of recognition, the Lisbon Convention is one tool here. We can motivate all the countries to have sufficient quality and quality assurance as well and that is something which may lead to a better situation one day. And that's all about it.

Christiane Gaehtgens
Which brings us back to the question of how binding such agreements should be.

Peter Williams
I think it is a very important question because it is too easy to forget the need to be explicit and clear about what programmes are for and what their purposes and objectives are. And when you are looking at questions of comparability, we're talking here about levels and about being able to

compare something quite clear and firm. The problem of higher education is that it serves a number of purposes and it is one of them to provide, if you like, a currency value for a qualification which is transferable across different environments.

But higher education has traditionally other purposes. The perpetuation of the academic species was for a long time the principal purpose of higher education: Making sure the next generation of researchers is there. Training, vocational training has always been important in higher education. But perhaps most important has been that of personal transformation, transformation of development for students.

Now it is actually quite difficult to guarantee (to plan, to design, to ensure) that all these things are actually there. But I think it is important that if you are looking at a subject area, a course in a particular discipline, with a very strong vocational element, that one does look back again at those criteria that Dr Anz put up on the slides from an employer's point of view on the first day of our conference here. That won't meet every subject. But we need to know what we are trying to do. Be explicit about that and make sure we have got ways of delivering what we are trying to deliver. And I think if we can do that, we are very conscious about that in our design and implementation strategies, for programmes to study, then we will begin to meet the kinds of challenges that you have identified.

Christiane Gaehtgens
Which is strengthening the role of individual accreditation and agencies, right, in your ABET issue?

Sir Roderick Floud
I think one should resist the temptation to try and solve every problem at once. And I think the lesson that I would draw from change in the quality assurance area and indeed more generally in higher education is that these systems evolve. If I just take the UK case, we have evolved from a system essentially of no quality assurance (or perhaps some kind of quality control through the rather peculiar Anglo-Saxon external

examiner system) through a quite rigorous programme evaluation to a light touch form of quality assurance under Peter's guidance and with an increasing emphasis throughout that process on enhancement. What we see in the Bologna Process is that different countries all go through that process of evolution at different speeds and in different national contexts. So, I would draw from this, and again re-emphasise, that the register is just another little building block. I wouldn't even put it as a cornerstone. I think it's a building block in this gradual evolution of quality assurance processes.

The problem which we have in the Bologna Process is that so many different things are going on at the same time. I mean we've been concentrating on quality but there are equally important discussions about the social dimension, about the internationalisation, about what are the principals of European higher education as well as all the issues about the development of learning outcomes, the transformation of the syllabuses in most European countries in response to the changes in the structures of higher education. So, it's an enormous agenda and I don't think we should worry too much if it takes us the next 25 years to carry it out. And I think we should certainly not expect a simple solution like the register, to solve all problems.

Christiane Gaehtgens
A few more questions and then we'll have last comments and answers from the panel. Bruno, you were first.

Bruno Curvale, Project Manager Comité national d'évaluation, France
Bruno Curvale, I am with the French quality assurance agency. We have been talking a lot about the register but we haven't talked about the Quality Assurance Forum and that is something that we should emphasise more. We make it possible for more people to be involved in the debates, in the discussion about this topic. So in perspective of the London Communiqué I would like to see more emphasis on this tool.

Hubert Jurgensen, Vice-Chairman of the European Evangelical Accrediting Association

I have been active for over 10 years now in transnational accrediting agencies and it has become obvious to me that there are different understandings of the philosophy of higher education. Just comparing Germany and Britain, there are more or less restrictive understandings of what higher education is. There is quite a difference. It goes down into the details when it comes to access conditions to higher education. There is an open philosophy in the UK, Germany is quite restrictive. Now I think this is at the very foundation of some of the differences that we sense in that quality dialogue. How do we find that framework of higher education? I would encourage the panel to have a more visionary view and not the restrictive view that I am afraid of perceiving in that entire debate about the register. Is there a difference in defining higher education? Do 50% of our young people have access to higher education or do we only have 35% as it is the case in Germany? Britain is somewhere, if I am not mistaken, around 50%. Behind that there are different definitions of higher education. Maybe I could get an answer on that issue.

Christiane Gaehtgens

We'll try. And I'm sorry if I can't take everyone with regard to time but I'll take two or three more depending on the length of your questions. There is one more here. Then Professor Kohler and I saw another hand here.

Regina Weber, Management of fzs (National Union of Students in Germany)

I'm from the fzs – that is the national union of the students in Germany. In Bergen it was stated that the social dimension is an important element to look at when you want to achieve the goals of the Bologna Process. So my question is: When we talk about quality, how can you link the social dimension to quality or quality assurance?

Professor Kohler, German Accreditation Council
I have been fascinated by the debate and worried at the same time. I'm fascinated because it oscillates in a wonderful way between the grand picture of putting everything on the table and then looking at the little corner of the register so there is plenty to comment on. The point that concerns me in this context is the comment that Peter Williams made: It is a valuable political observation that the political arena matters are agenda-driven and answers are expected before questions have been asked. Now, this is where politics and academia usually collide and this usually gives rise to concern. If you put it into terms of Lewis Carroll you could say, how do we get from Alice in Wonderland to Alles in Ordnung? Which would mean how do we manage risk management in this process?

Let's look to the future: what will be the implementation process afterwards and do we need more fine print or do we need more asking after the act in order to come to a more refined concept for instance of this committee which gives great concern to me personally, especially in view of roles in a normative sense, in a case to case decision-making role of composition, of consultation and the various rules attributed to the register committee.

Christiane Gaehtgens
Thank you. I think it's time for our answers now and summing up comments, so we'll start with you, Peter, this time.

Peter Williams
I'll answer that last question first, although this is subject to discussion within E4 of course. I think it's possibly the least difficult of the ones to answer, surprisingly. I agree that we probably need to ask the ministers to invite E4 to set up a proto-register committee that is just a group of the people involved who would then prepare the business plan in detail with the operational proposals which then of course BFUG will have to look up. Because ultimately it is the Follow-Up Group that will own the register and not E4. The BFUG will have the political control over it even though it will be an independent entity. There was discussion at the last BFUG board meeting how it might pull the plug; not constitutionally but

financially, or politically. But the important thing is to get the Follow-Up Group to agree to a process of development of the business plan of the arrangements which everybody is satisfied is watertight and will do the job. So I think that is the next stage, not to meekly set up a register but to set up a shadow register committee.

Koen Geven

I just hope that that will not be adding bureaucracy to our debate. We will be able to set it up quickly because it is highly needed, but I don't think that that is the argument behind what you are saying, Peter. There is another issue that I think I have to address which was the question about the link between quality and the social dimension. While discussing the social dimension in the Bologna Process we have already agreed a long time ago that the social dimension is something transversal. That reflects in every action line that is part of the Bologna Process. And thus it also reflects on the discussion on quality.

Internally we think that quality is essential for a social dimension. There is nothing like a trade-off between quality and actions: If there is more action, there is less quality. We think that increasing the quality will make more students actually enter into higher education because there will be more time to guide students, to actually teach them or let them learn, and set in action this transformative process that we are talking about. So, we do think that quality is essential for the social dimension. Getting a more educated society should be one of the core goals of the higher education system.

Sir Roderick Floud

I think the ESIB representative has put the answer exactly right. I entirely agree with what has just been said and don't need to say it again. What I would like to add is that if I were a minister, I would be puzzled at the length of time that it has taken to answer their suggestion that there should be a register of quality assurance agencies. Over the past 8 years we have collectively transformed the higher education systems of most of the European continent in terms of definitions, the purpose of higher education, the outcomes from higher education courses, the structure of

higher education courses, the nature of degrees etc. Why on earth are we making such a meal of this issue of the register which is a rather small thing. We've got some of the cleverest people in Europe sitting around discussing this particular issue. Can't we just decide to get on and do it?

Bilger Hendriks
I think we can.

Christiane Gaehtgens
We're getting there.

Bilger Hendriks
And I don't think it has taken too much time because it's not very easy to think about a totally new – let's say – quality assurance frame or quality assurance list like the register. Because you have to ask what the national role of the national system is. That has to be combined, that has to be brought in line with each other. Since Bergen we have been checking the practicalities. I think we will give a lot of basic answers and will have to define some special conditions on that and perhaps will have to ask questions for the time to come. And then I think it'll work. It will take some time as all these things do, and when we meet in Loewen for the next conference I hope we can say, the main work has been done and we are now having a register of quality assurance agencies that works effectively and meets the need of all stakeholders.

Christiane Gaethgens
It has been said rightly that our discussion has been oscillating between very practical, detailed approaches to problem-solving and a general discussion about the importance of quality assurance and quality improvement. I think this is a benefit. It can be seen as a defined result of this conference and put forward to the London Conference as such. First of all, there is a general consensus that even though quality assurance in all its aspects is burdensome, is a challenge and is difficult to achieve, putting quality assurance into place is essential at all levels of our higher education system: at an individual level for each individual teacher and researcher, at an institutional level, at a national level and at

a European level looking at the US and Asia as competitors. Otherwise we won't be able to meet the challenges.

Secondly, we've made it very clear that the central responsibility in a growing higher education system lies with the universities and the academics themselves. And this is not just a statement. It means that all further procedures like legal provision, agreements etc. have been based on this conviction. Institutions have to be empowered in order to take this responsibility, both in terms of funding and in terms of their rights. For example they have the legal provision to

- choose their own students,
- take their own decisions on how to use their funding,
- enter into their cooperations,
- employ their own staff at the conditions that they consider right (payment or pension rights for example).

This is quality assurance as it stands as well as talking about qualification of academic teachers and of contents and outcome of courses.

It has also been said that we need to strike the balance between framework and responsibility on the one hand and this essential academic responsibility on the other hand. And we have made it clear: While quality assurance is no substitute for sufficient funding, formalised accreditation is no such substitute for quality improvement – it's just one step towards that, but an essential one. A register or a list or an agreement between nations competing or cooperating on quality assurance procedures and on institutional level is no substitute for accreditation itself. It doesn't prove quality in itself. But they all need to go together.

Here we enter the level of realising this general challenge. We've said that the register (that has been so much talked about) can certainly be a building block in this cooperation. While there has been controversial debate about such a limited issue, we can maybe enter a zone of easier decision-taking and easier cooperation when we start. The register is one

step towards realising a kind of quality improvement in Europe. It should not become practice in the sense of a wide-reaching bureaucracy that ties in and that is watertight against all legal implications, even though this is the hope of many of those that have responsibility for the development of the Higher Education sector and for making all this recognition of degrees and of programmes operational.

It has been made very clear that the risks in this context need to be taken, which is certainly not an easy answer but one that is very adequate to what academia has been about for centuries. Thank you very much.

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