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Osaka University
External quality assurance in European higher education: between the State, the market and academia

Michaela Martín

Introduction

Policy-making and management of higher education have been traditionally concerned with the maintenance and enhancement of academic standards and processes. The expansion, diversification and privatization of higher education systems in the European region have brought with them an increased concern with the quality of higher education. In addition, globalization is widely affecting higher education in Europe and elsewhere, and creates new challenges for its regulation. An increasing number of students travel abroad to study in a foreign country and professionals tend to move more easily from one country to the other. In addition, institutions and programmes move across borders, either in the form of e-learning, franchising or branch campuses, and add considerably to the traditional offer of local public higher education institutions.

In Western Europe, quality assurance mechanisms used to be highly dependent on the administrative tradition of a country. Higher education systems in Continental Europe used to be tightly controlled by the State and thus laid the emphasis in quality management on bureaucratic input steering. In the United Kingdom, on the contrary, much of the authority over higher education was left to the professional authority of higher education institutions and their academics which used to design and implement their own quality assurance systems.

There is, however, nowadays a noticeable convergence towards external quality assurance (EQA) systems within the European region. This convergence is largely motivated by the so-called Bologna Process, whereby governments of the European region have agreed to a process aiming at the harmonization of qualification structures and quality assurance processes by 2010. The proposed convergence in the quality assurance processes seems to address the perceived shortcomings of the traditional mechanisms for quality assurance found in both administrative realities. While national authorities seem to lack the competence to make judgment about the quality of academic programmes and institutions, there is little comparability of standards when academic institutions are both providers and judges of their own services. For this reason, external quality assurance is most commonly organized through the creation of a new independent administrative structure, an agency, which tends to function as a professional buffer organization between public authorities and higher education institutions. This professional buffer organization forms a new locus of control and authority, which may reinforce the authority of the State, the professional community (in a collective fashion) or the market, depending on the particular shape the external quality assurance scheme takes.

One of the main concerns of newly emerging EQA systems is the quality of teaching and/or academic programmes, whereas earlier instruments tended to concentrate on the quality of research. Another emphasis is the growing concern with outcomes, linked to an overall change in the steering policy by the State. From the input steering approach used traditionally in Continental Europe (i.e. provision of equal resources to institutions and clear rules over the use of such resources), governments tend to delegate more autonomy to these institutions and.
to request "accountability", i.e. a demonstration of valuable outcomes. Finally, there is also a new emphasis concern on **periodic assessment**, based on the premise that quality is not a static condition and that it needs to be assessed and enhanced regularly.

Beyond this convergence in common concern, external quality assurance systems take, however, many different forms across a Europe where academic traditions, culture, as well as structures vary from one country to the other, and sometimes even within educational systems themselves. This paper takes as its fundamental assumption that under a common umbrella of emerging elements of convergence, there are many differences which can be explained by the relative power exercised by the three prevailing forces of co-ordination in any higher education system—that is the state bureaucracy, the academic/professional community and the market. The relative strengths of these co-ordinating forces is changing predominantly under the newly arising imperative of “new public management” which gives major power to the market and redefines the role of the State.

1. General trends in European higher education systems which enhance the need for external quality assurance

Higher education systems in the European region are currently heavily affected by a number of common trends, frequently interrelated, which request ongoing change and adaptation, both at the national and institutional level.

**Expansion of systems and privatization of the sector**

A rapid increase in the late 1980s and early 1990s allowed an important number of countries in the region to reach a participation rate in the order of 40% which has by now leveled down to what is currently estimated to be an overall participation rate of 55%

Given a frequently insufficient financial capacity to respond to the social demand for higher education in Eastern Europe, many countries there that were formerly completely committed to exclusive public systems of education have adopted legislation that allows for the development of the private higher education sector. This has led to tremendous growth in the private provision of higher education in Eastern Europe over the last decade. In addition to this quickly developing higher education offer under private rule, public higher education institutions have also undergone major privatization processes throughout the European region through a growing reliance of cost-sharing arrangements and income-generation measures. The concept of the “entrepreneurial university”, which is able to generate a considerable part of its funding, has become a new model for university development.

**Deregulation and the New Public Management concept**

In most European countries, governments have redefined their roles as public authorities under the **New Public Management** concept. NPM suggests, as one of its pillar ideas, greater reliance on the deregulation and decentralization of power from the government or its agencies to institutions. In many European countries, deregulation has become part of a broader reform of public organizations where the decentralization of decision-making, incentives for units and individual staff, negotiation of objectives and targets, as well as output-control and a funding system based on output measures are the predominant tools.

In the area of higher education, the **New Public Management** concept has led to so-called indirect steering of

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higher education, where public authorities tend to limit their role to the setting guidelines and provision of resources and incentives, and where institutions and the State negotiate more detailed objectives in terms of activities and outputs. However, the demand for accountability and trust is also raised on political agendas, parallel with the greater freedom for higher education institutions to take decisions at their own discretion. Governments in Europe, now more than ever, expect institutions to be accountable to their students and the public at large for the quality of their services and the utilization of resources. Consequently, institutions in European countries worldwide have been urged to provide information on their results as well as on their expenditure.

The New Public Management concept also suggests a greater reliance on market mechanisms. Some countries have a long-standing tradition in this area, whereas others have adopted instruments which give a greater role to the market more recently. In highly diversified and market-oriented systems, the provision of information to the public through accreditation is a longstanding practice with consumers and the public at large, in addition to governments requesting market transparency, hence public information on institutional performance. Requests by students and parents for information on the quality and performance of higher education institutions have now also become apparent in the European regions that tend to be steered, to a larger extent than before, by market forces.

Regional integration processes within the European Union and the Bologna Process for higher education

The European Union provides a framework whose main aim is the creation of an internal market with the free movement of goods, services, capital and persons. The European Economic Treaty and its subsequent amendments have entailed a level of professional mobility in certain professions never experienced so far. This creates stronger pressure on European countries for a comparability of educational standards and on institutions to confer recognized qualifications for a European labour market. Within this context, the Bologna Process, launched in 1999 in the European region, aims at establishing by 2010 a common qualification structure within the so-called European Higher Education Area (Bachelor’s, Master’s and PhD) which is by now composed of 45 signatory countries, a credit transfer system and a national quality assurance mechanism, all of which are jointly aiming at facilitating the mobility of students and professionals and increasing the quality of European higher education. Since 1995, the European Commission, supported by the Council of Education Ministers, has actively supported the development of common standards in external quality assurance, first through the 1994-1995 European Pilot Project which helped to establish a methodological framework for QA, and then through support directly provided to the European Network of Quality Assurance Agencies (ENQA).

In the European region since 1999, the concept of the quality of higher education was strongly influenced by the follow-up of the Bologna declaration in which the EU Ministers of Education called for more visibility, transparency and comparability of quality in higher education. Quality assurance agencies throughout the European region had to determine their understanding of what quality is and the main approach they would take to the definition of quality, the stakeholders they would consult, the way in which it will take into account international standards and definitions, and the means to legitimize and make this definition acceptable throughout the system. A common understanding was reached to involve students in the process of quality assurance not only as providers of information, but also in the assessment teams.

One of the tensions emanating from the Bologna Process is the one between a tradition of European higher education conceived as a public service and thus predominantly publicly funding and a more market-oriented system, which is by definition the more favored approach by the European Commission. This has led to a major controversy about the relative weight of and linkage between internal and external quality assurance of higher education. The Conference of Ministers requested the European Network of Quality Assurance Agencies (ENQA) to develop guidelines that all European quality assurance systems should comply with. It was proposed to create a register of all quality assurance agencies allowed to perform accreditation in Europe. This idea was, however,
rejected at the last Ministerial Conference in Bergen in May 2005 because governments, with the consent of collective bodies of European higher education (both institutions and student bodies), were not ready to give away the sovereignty over their QA systems and agencies.

**Alternative policy instruments for regulating academic quality**

Quality assurance of higher education is by no means a new practice or request. Traditionally, all systems of higher education have established control mechanisms over academic activities.

However, the nature and extent of these mechanisms vary widely according to different higher education systems. The systems of higher education strongly influenced by State control and intervention in Continental European higher education systems (as opposed to institutions in the United Kingdom) have traditionally operated through ex ante control of inputs such as yearly item-line budgets, civil servant status of academic staff with control over entry qualifications, and State-regulated admission systems. Educational processes used to be controlled by means of procedures of approval for the curriculum of new study programmes, detailed prescriptions of the workload and minimum contents, as well as types of examinations to be conducted. At the institutional level, evaluations of the academic performance of individual scholars—in particular, their research performance—has been conducted most commonly by heads of departments or departmental committees, or otherwise by disciplinary committees at the national level. Performance has been measured generally taking account of the number and quality of publications. This type of staff appraisal has been conducted in relation to decisions on either promotion or recruitment. The assessment of research outcomes within the community of scholars, most often informally by peer assessment, is a rather well-established practice in most higher education systems.

In the UK, up until the election of the Thatcher Government in the 1980s, the assurance of academic quality in the publicly-supported university sector was primarily through professional self-regulation, as academics monitored and assured the standard of university degrees through collective mechanisms such as the external examiner system.

The newly emerging concern and pressure for external quality assurance, requested in particular by European governments, bring with them three types of innovation:

- First, they refer to areas of academic life in which governments or funding agencies have interfered only marginally before. In particular, a special interest in the quality of teaching/learning has strongly emerged in countries worldwide where governments either create mechanisms to investigate the teaching or learning conditions or encourage institutions to set up their own mechanisms for assuring that established standards are met.
- Second, national authorities or institutions request assessment to be conducted on a regular basis (and not any more on an ad hoc basis for certain types of decisions).
- Third, the current movement of quality assurance is concerned more with outcomes than with inputs and throughputs.

Governments have a broad range of policy approaches for influencing academic standards. Based on a theoretical notion phrased by Burton Clark (1984) of the three coordinating powers in higher education: the academic/professional oligarchy, the State, and the market—these encompass, broadly speaking, three different types of instruments:

- directly monitoring the quality of institutions and programmes by the State;
- providing incentives to professional organizations for their self-regulation;
• relying on market mechanisms for the improvements of academic quality.

There is now widespread agreement that social and economic changes are altering the traditional balance among these forces in many countries, lessening the influence of the professional authority, while increasing the influence of the market and the State. It is the state, however, through its public policies which influences the degree of both professional self-regulation and market forces through a grant of authority.

The below Table 1 suggests a matrix developed by David D. Dill of alternative instruments for the regulation of academic quality.

Table 1: Alternative policy instruments for regulating academic quality by locus of influence

<table>
<thead>
<tr>
<th>Focus</th>
<th>Professional self-regulation</th>
<th>State (direct) regulation</th>
<th>Market regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Research</td>
<td>Professional peer judgments</td>
<td>Research assessment (RAE)</td>
<td>Competitive allocation of research funds by the State</td>
</tr>
<tr>
<td>Teaching/learning</td>
<td>Certification/licensing by professional disciplines/organizations</td>
<td>Assessment “regulation” Academic audits Subject assessment State certification/licensure State conducted accreditation Performance indicators National examinations</td>
<td>Student-based funding and tuition fees Information provision</td>
</tr>
<tr>
<td></td>
<td>External examining systems</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Voluntary accreditation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


Alternative policy instruments under Table 1 present a full list of instruments each pertaining to teaching and research. Each of the categories assumes a different locus of control and authority. According to D.D. Dill², “Professional or self-regulation clearly assumes producer sovereignty in which academics themselves are principally responsible for defining and enforcing the rules and norms governing academic quality. Direct State regulation of academic quality assumes that the State’s authority and control would be paramount in defining and enforcing academic quality regulations. For the market to work effectively as a means of quality regulation, it is necessary to assume consumer sovereignty over quality by the free market choices of the clients of education programmes and research”.

In the following section, we will discuss convergence and variation in the newly developed mechanisms of external quality assurance in the Europe region, to see whether there are any noticeable trend in the shift of authority for the regulation of academic quality.

2. Major organizational and methodological choices in European external quality assurance systems

In 2002, a study was conducted by ENQA among 34 member organizations operating in 23 countries³. It brought to light that most agencies adhere to the so-called four-stage model which conceives the QA process as composed of a self-study, site visit and the publication of a report, and being conducted by an autonomous QA

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² David D. Dill (2003), The regulation of academic quality: An assessment of university evaluation systems with emphasis on the United States. PPAQ Public Policy for Academic Quality Research Programme. www.unc.edu/ppaq
body. The general adherence to these process elements may give the impression that the methodology and organizational options are relatively homogeneous in practice in the European region. In spite of this apparent conceptual similarity, quality assurance agencies use the term “external quality assurance” in Europe to denote different practices to serve various purposes and they exercise the responsibility of quality assurance through many modes. The definitions of the various approaches are not sharp and, in practice, quality assurance agencies frequently follow a combination of basic approaches and options to adapt their quality assurance system to the particular requirements of the local context. Many important differences become evident in a comparative analysis of methodological options. They quickly bring to the fore that a set of basic process elements form a common structure, but that EQA systems vary even in their underlying objectives as well as basic approaches.

Overall purposes of EQA

EQA in higher education refers to a wide range of purposes and related methodological frameworks. Some of these reflect governmental interest and demand, whereas others address more directly internal needs of institutions. As a consequence, the purposes of EQA are tightly linked to the use that will be made of information outcomes. A broad distinction of purposes aimed at accreditation in an institution of higher education can be drawn between the following three elements:

- quality control;
- accountability/public assurance;
- improvement purposes.

Quality control relates to the traditional function governments have to assume to make sure that a higher education provision is in line with minimum requirements of quality. Where higher education systems are public in the majority, as is the case in Western Europe, this function used to be less prominent because it was assumed that sufficient input steering would necessarily produce acceptable levels of quality. This is now questioned and, in addition, the ongoing process of privatization in Eastern Europe, and in particular, the proliferation of private national and international providers, has enhanced the need for Eastern European governments to check on minimum levels of quality, be it only to protect national consumers and to make sure that a higher education provision relates to national development objectives, in one way or another.

Secondly, EQA which is mainly geared towards accountability, is commonly also commissioned by public authorities as part of their higher education policy agenda. It is frequently linked to “value for money concerns” and the creation of transparency and public assurance. Accountability and conformance concerns reflect the need to provide public information and to make judgments about the fitness for purpose (including a fitness of purpose concern), soundness, or level of satisfaction achieved. EQA, conducted with a predominant accountability objective, is commonly used to provide assurance to external stakeholders about levels of ‘quality’, acceptable or high level standards, as well as ‘international comparability’ of both public and private providers.

Through the quality model it uses and the setting of criteria and standards to be measured, accreditation as one of the standard-based approaches among the EQA models can also be used by the government to make higher education institutions more conformant with policy preferences in general, and recent reform initiatives in particular. It is certain that accreditation standards communicate a detailed framework of preferences against which institutions know they will be judged. Together, with legal frameworks and funding methodologies, external quality assurance has become a strong instrument for the steering of academia. This is particularly the case with regard to

4 see Lee Harvey, p.24
reporting systems between institutions and governmental authorities, which can be highly enriched through the regular provision of data and reports from quality assurance agencies.

Thirdly, EQA may also be geared explicitly towards the **improvement** of existing practices. In order to achieve this purpose, it will have to largely rely on an involvement of the people responsible for teaching and research activities, the academic staff, whether individually or collectively. It seems evident that EQA will lead to improvement, partially through the compliance objective, and partially through the setting of so-called high level standards which are expected to provide targets towards which institutions and their departments will be striving. But the main reason for the improvement brought about by EQA is the formal and systematic self-assessment procedures it helps establish within HEIs. It is argued that ‘transformative’ quality improvement happens more easily when academics start from their own teaching reality and assess it openly. Otherwise, an EQA system may simply produce what it now phrased as a ‘compliance culture’.

In the Western European region, where most higher education institutions are financed in the majority from public funds, quality assurance mechanisms tend to focus on both the improvement and accountability issue. In Eastern Europe, QA systems tend to emphasize the control function because public authorities frequently have become discredited for the regulation of the system, which over and above has been privatized to a large extent. The European Association for Quality assurance in Higher Education (formerly ENQA), in its *Standards and Guidelines for Quality Assurance in the European Higher Education Area* presented in 2005 at the Ministerial Conference in Bergen, emphasizes that quality assurance is primarily a function of the higher education institution, and thus a responsibility of the professional community. EQA systems should thus “take into account the effectiveness of the internal quality assurance processes” whose components and processes are also spelled out under the same guidelines.

**Compulsory vs. voluntary quality assurance systems**

One of the most important options of a quality assurance system is whether it is of a **compulsory** or of a **voluntary** nature. A compulsory system requires all institutions or programmes which fall under the EQA mechanisms to periodically undergo QA at specified intervals. A compulsory EQA system is generally, however not exclusively, concerned with checking on minimum standards. Compulsory systems are thus frequently set up because there is a deficient or non-existent licensing scheme, or they apply to types of programmes where the State has a special responsibility, such as teacher training or programmes preparing for professions which are vital for national development and security such as medical professions, architecture and civil engineering.

Most currently existing EQA systems in the Western European region are of a **voluntary** nature. This means that institutions and departments have the option to not undergo EQA. Their motivation to apply for EQA may be either a concern to obtain special status (being accredited), which would give them an advantage in a competitive environment for students and funding, or access to specific funding (for instance student funding or special incentive schemes). When EQA systems are voluntary, there is commonly an expectation that the advantages related to EQA will create a momentum through which all or at least the majority of institutions will be pulled into the system. Voluntary EQA systems are more commonly related to a policy agenda of quality improvement, because institutions and departments can decide themselves whether they wish or not to join the process depending on whether they wish to adhere or not to the proposed quality model. Voluntary EQA systems are also more easily acceptable to the higher education community because they generate less opposition from a usually well-organized societal force.

If in the past most Western European quality assurance schemes used to be of a voluntary nature, more recently, many systems tend to become of a compulsory nature. In particular, again in Eastern Europe, most QA systems are control-oriented and are thus set up as a compulsory regular mechanism, as is the case in Hungary.
Fitness for purpose vs. standard based approach

The above-mentioned dichotomy of purposes and fundamental nature (compulsory/voluntary systems) is also directly related to the question whether the point of departure in QA should be either ‘fitness for purpose’ or ‘standard-based’. The ‘fitness for purpose approach’ departs in its analysis from the stated purpose of a higher education institution or a programme (mission statement), while also asking whether this purpose is an acceptable purpose of higher education or not (fitness of purpose). This approach has been heavily supported with the argument that institutions and programmes cannot all be judged against the same standards since they may serve specific clienteles and service groups in a diversified system of higher education. For instance, a traditional university located in a major urban environment heavily emphasizing the excellence of its research may not necessarily be judged against the same set of standards as a teaching-only institution whose aim is to train non-traditional student groups. It has, however, also been argued in the discussion about accreditation systems that certain standards (in particular minimum norms) must be requested from all higher education institutions, and that they must be held accountable against them. This is more and more the prevailing thinking, in particular within the context of a growing request of international comparability and, as a consequence, more and more systems of quality assurance move towards a standard-based approach of accreditation. The ‘fitness for purpose’ approach is usually understood as being the more appropriate approach for quality improvement, whereas the standard-based approach is more easily associated with accountability and conformance.

While most quality assurance schemes in Western Europe used to be based in voluntary and fitness for purpose approaches, there is, however, a more recent trend to adopt criteria and standard-based approaches. This of course is particularly true for accreditation, where threshold criteria or minimum standards are used in order to pass judgment. The French system of quality assessment has been based for close to 20 years in a rather open system of review whose aim it was to assess the particular strengths and weaknesses of a higher education institution, and aiming at the provision of information to improve the internal processes at a given institution while making information available to the broader public. In 2003, it was decided to adopt a series of standards which would serve both evaluators and higher education institution in their internal management.

Assessment, accreditation and quality audit

EQA systems may focus on the quality of activities and services themselves or on internal quality assurance systems. If they focus on the quality of activities and services, these will be judged from the point of view of institutional goals or on the basis of a set of standards which is usually the function of assessment and accreditation. Assessment is the more general approach to quality assurance and usually aims at identifying the strengths and weaknesses of an institution or a programme. Assessment is a relatively open approach and, depending whether it is of voluntary or compulsory nature, will make available information on the quality of programmes and institutions to all actors in the system and thus reinforce the market, while also reinforcing opportunities for professional self-regulation (in particular to the management of higher education institutions). When it is of compulsory nature, it certainly reinforces the authority of the State.

Accreditation generally means a process which precedes the launching of a new programme (ex ante), also frequently called licensing, or the accreditation which applies to establish one—ex post). Accreditation is usually conducted against minimum/threshold or good practice standards. Its major rationale is to provide assurance and information to the public of acceptable programmes or institutions, in particular to: government, students, employers, funding organizations, and institutions of higher education.

While accreditation systems are put in place to ensure governmental authorities and other societal stakeholders that higher education is performing and will perform adequately, they accomplish broader purposes including those related to the management and planning of higher education institutions as well. Most quality assurance sys-
tems in Eastern Europe have adopted accreditation as the preferred mechanism. More recently, however, Germany, Norway, Switzerland and the Netherlands have transformed their earlier assessment systems into an accreditation mechanism.

Similar to assessment, accreditation systems may either be an instrument to reinforce professional authority (at the management level) when they are of a voluntarily nature, or otherwise the authority of the State, when they are compulsory in nature.

**Quality audit**, in opposition as defined above, is a method which judges the extent to which an institution has a monitoring system in place which conveys a clear view over its strengths and weaknesses. This means that an institution needs strong internal reporting mechanisms as well as data collection mechanisms on ‘teaching performance’, and to collect systematic data on student, graduate and employer satisfaction. It also means that an institution has mechanisms in place to deal with low quality and to continuously enhance good quality. Since it focuses on processes, quality audit is thus very much in line with the ‘improvement’ objective of external quality assessment, but it does not lead to the certification of or compliance with a particular level of expected quality, neither to comparability of such levels of quality, which is the case of quality assessment when it is standard-based. If a quality assurance agency conducts quality audits, it assesses whether higher education institutions have a reliable and adequate internal quality assurance system in place.

Quality audit has proven to be a preferred option for mature and relatively homogenous higher education systems such as Norway, where quality improvement is the major objective. Quality audit is also the preferred mechanism for governments that wish to strengthen the authority of the management of the professional community. Quality audit in Europe is conducted by approximately one-third of all agencies and it usually focuses on institutions. Institutional audit is used by all Irish and British agencies, for example, and some of the agencies in Nordic and associated countries.

**Institutions and/or programmatic EQA**

Another basic option with which all EQA systems have to address is the *unit of analysis*—that is, whether EQA should be institutional or programmatic. EQA of institutions is naturally much broader than EQA programmes, and focuses most frequently on the following domains of analysis:

- mission
- governance
- effective management
- academic programmes
- teaching staff
- learning resources
- students and related services
- physical facilities
- financial resources

Institutional EQA investigates whether the mission and objectives of a HEI is appropriate and whether its resources and processes are appropriate to achieve them (under the fitness for purpose approach) or whether certain standards are attained. Institutional EQA looks at the institution as a system of which academic programmes are a part. It needs thus to be relatively generic and only relatively modestly take into account the differences in objec-

5 Marjorie Peace Lenn, *ibid*, p.8
tives and performance existing among the different institutional sub-units. Institutional EQA may be the preferred option in a system where quality varies widely between institutions and when institutional management is rather weak. It may thus be a strong means to strengthen the management capacity of a HEI.

Programmatic EQA focuses on individual study programmes, many of which prepare students for a specific profession. Since each study programme may have its own policy on student recruitment, standards and criteria for curriculum, and in addition be subject to requirements arising from National Qualification Frameworks, it makes sense to quality assure individual programmes. Programmatic EQA may particularly assess whether an educational programme is related to the professional expectations for entry into a specific profession. Over and above, institutions may offer programmes of different quality in different disciplines which institutional EQA cannot recognize. Programmatic EQA is thus a strong tool to address issues of deficient quality at the level where improvement decisions have to be taken, that is at the department.

It is, however, also true that programmatic EQA necessarily has to address many of the dimensions which relate to the broader institutional environment, such as the management of the institution and the department and facilities which have a direct impact (constraint or enable) the quality of the study programme. Any programmatic EQA has thus necessarily also an institutional dimension.

Both types of EQA are thus very much interwoven. Institutional EQA cannot be conducted without looking at programmes, but programmatic EQA needs to look into the broader institutional environment. Countries usually start off with a focus on either the institution or on its programmes. However, they eventually understand that both are very complementary and nurture each other. Many systems that formerly had a clear focus on one specific aspect have decided throughout time to incorporate the other aspect. Some countries conduct both and attempt to link them up in one single process.

In the European region, programmes are the most frequently chosen focus of both assessment and accreditation activities, especially in the non-university sector. This is probably the case because of the strong professional emphasis of the programmes in the non-university sector and the tradition of private, professional accreditation of programmes. Prevailing approaches are the assessment and accreditation of programmes, the latter to be found more in Eastern Europe, but also in Germany and the Netherlands. Many agencies conduct both institutional audit and programmatic assessment/accreditation, or apply both in an integrated fashion, such as in Hungary. The basic choice really depends on what element, institution or programme is perceived to be in need of strengthening.

**Affiliation and accountability of the agency**

Quality assurance needs a structure, which is most commonly materialized through the creation of an agency. This agency may be organized under the direct control of a ministry of education or a public buffer, it may be a para-statal agency, or an agency organized under the ownership of a collective body of HEIs. The ownership of the quality assurance agency is directly related to the issue of whether the system is focusing on control, accountability or improvement, and who is exercising the power over the quality assurance agency (professional community, the State or the market).

For instance, in the case of agencies established by governments, governmental officials, such as a representative from the Ministry of Education, tend to sit on or even chair the governing body. In addition, the government may have various mechanisms such as calling for annual reports to monitor the performance of the agency. When owned by the HEIs, the quality assurance agency becomes accountable to the HEIs. There are wide variations in the way the accountability measures are implemented and some of them are discussed below.

- **Built-in checks in the functioning of the quality assurance agency brings in an element of accountability.**
  There are many built-in checks that ensure that stakeholders are involved in shaping and monitoring the
quality assurance processes. Representation of the various stakeholders and, especially, the cross-section of the academia in the governing bodies is one way of ensuring that the agency remains accountable. Some agencies have a representative from the public. Some others involve a representative from the user end in the governing board. There are quality assurance agencies that have elaborate procedures to receive nominations for the public representative to serve in the governing board. Quality assurance agencies in general submit their plans and annual reports to the governing bodies which may even be made public to ensure transparency and to enhance accountability. Making the reports public helps in public accountability. Having international presence in the governing bodies is another way to ensure that the policies and procedures are compatible with practices in other countries and add an element of comparability.

In the European region, most QA agencies are set up as autonomous, bodies which shows that the State wishes to maintain an important role in their steering and policy-making. Most agencies have board or a council and some kind of academic board members to represent the academic community. In half of the agencies, the labour market representatives are on board, in 1/3 students and in 2/5 of the cases the government is represented. The main source of funding is the government, but also higher education institutions in 1/3 of the cases).

• **An umbrella organization may look into the accountability of the quality assurance agencies**

When quality assurance agencies are set up under private law, they frequently need to obtain recognition from an umbrella body as an accountability measure, since they fulfill a public service function. In the European region, most QA agencies are public in nature. One exception is Germany, where several regional private equality assurances exist which themselves need to obtain accreditation from a public umbrella body, the Akkreditierungs rat. This umbrella body has been created in 1998 to provide recognition to those private not-for-profit accreditation agencies which offer their services to German higher education institutions. These agencies are recognized or not on the basis of the below criteria.

• **Voluntary coordination in regional networks and adherence to their standards and criteria**

It has become common practice that quality assurance agencies join voluntarily together as networks and follow commonly agreed principles or practices. This is also the case in Europe where 34 agencies are part of the ENQA network. Although they may not have the accountability concern as the main driver for joining networks, adherence to common standards and criteria simultaneously enhances their credibility and serves to demonstrate the accountability of the agency. Good practices developed by the ENQA network are grouped together under the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” which represents a series of good practice standards.

• **Register of agencies to ensure accountability**

The idea of creating a register of QA agencies allowed to deliver QA services all over the European region under a commonly agreed framework of principles and standards was presented and discussed at the Ministerial Conference in Bergen 2005. This option was not adopted by the ministers of education, most likely because the member countries were not willing to give away their sovereignty over educational standards and QA procedures. This option would have considerably reinforced market mechanisms in the regu-

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6 The Danish Evaluation Institute (2003), Quality procedures in European higher education. An ENQA survey. ENQA occasional papers 5. ENQA. Helsinki, p. 8
lation of higher education quality, widely to the detriment of both the State and professional authorities. The non-adoption of the register idea demonstrates the limits existing in the European tradition of State regulation and of public service to handing over more sovereignty of the market, which would be the preferred option of the European Commission.

3. Conclusions

The above discussions show very clearly that quality assurance brings with it an inherent tension of local applicability of processes, criteria and international/regional compatibility. All quality assurances have to respond to both imperatives and they try to do so within available options, many of which have been discussed in this paper. *Table 2* presents a comparative analysis of the linkages that exist between the basic purposes (linked to the predominance of the State, professional of market co-ordination) and major options in EQA.

**Table 2: Classification of basic options used in EQA systems**

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Quality control (State)</th>
<th>Accountability/public assurance (State/market)</th>
<th>Improvement/guidance (professional community)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nature</td>
<td>Compulsory</td>
<td>Compulsory or voluntary</td>
<td>Voluntary</td>
</tr>
<tr>
<td>Preferred mechanism</td>
<td>Licensing</td>
<td>Accreditation/assessment</td>
<td>Quality audit</td>
</tr>
<tr>
<td>Framework for QA</td>
<td>Standard-based approach</td>
<td>Fitness for purpose + fitness of purpose</td>
<td>Fitness for purpose</td>
</tr>
<tr>
<td>Procedures</td>
<td>Mostly external assessment</td>
<td>Both external and internal assessment</td>
<td>Mostly self-assessment</td>
</tr>
<tr>
<td>Agency affiliation</td>
<td>Ministry</td>
<td>Ministry or para-statal</td>
<td>Autonomous or under collective HE body</td>
</tr>
</tbody>
</table>

While the approach to quality assurance has variations to serve unique national contexts, there is agreement among European agencies on certain common features of QA systems:

- They base assessment on predetermined and transparent criteria.
- They use a combination of self-assessment and external review.
- The extent of the evaluative nature of the self-assessment may vary. Many of the specialized or professional accreditors just ask for information, without requiring analysis or evaluative judgments on the part of the programmes being assessed.
- They emphasize public disclosure of the outcome (although the extent of public disclosure varies from disclosure of only the final outcome to disclosure of the full assessment report).
- They ensure the validity of the assessment outcome for a specific period of time.

Within this overall similarity of EQA systems, the above discussions have exposed the manifold options in setting them up. It has been argued, in particular, that EQA systems tend to be set up with the aim of reinforcing one or several co-ordinating forces, i.e. the professional community, the State and the market. It can be argued that the setting up of a new quality assurance mechanism takes away the decision-making power from the individual and collective bodies of academics at the institutional level and puts it in the hands of a new professional actor, i.e.
the quality assurance agency which fulfills a new function in the regulation of academic quality.

The type of quality assurance: assessment, accreditation or quality audit is of particular importance. Compulsory systems which usually aim at reinforcing certain standards tend to reinforce the power of the State, whereas voluntary systems tend to maintain authority within the professional community. Compulsory accreditation, for instance, maintains much power in the hands of the State, while voluntary accreditation reverts power back to the professional community. It should, however, be noted that even voluntary systems tend to shift authority from individual academics to the management level of departments and institutions, and thus inform management decisions.

Since QA systems do usually provide public information on the quality of higher education institutions or programmes, they tend to strengthen market transparency and competition of institutions. This is particularly true when students can choose their institutions and have the capacity to access and choose their higher education institutions and make use of this information. The information provided by quality assurance systems will reinforce market mechanisms in particular then, when there is a real market for higher education services and when students have to pay fees to access this higher education. In Western Europe, this is not yet the case, since governments are still the main funders of higher education systems, and thus there is no real market in place. This is, however, much more the case in Eastern Europe, given the fact that many public institutions accept a great number of fee-paying students and there are a considerable number of private providers in place. The non-adoption of the register idea for quality assurance agencies, which would have put in place a real market for QA, shows that governments in the European region are not yet ready to convey such a prerogative to the market.

At the end of the 1990s, QA agencies in Europe were sticking to assessment, while more recent years have seen a growing number of accreditation schemes in place. There is also a shift away from the fitness for purpose approach to the use of pre-defined criteria or standards, which is a direct consequence of the shift from assessment to accreditation. This seems to indicate that, after a period of experimentation, governments wish to see agencies perform a substantive role for the regulation of the system. While delegating power to a professional QA body, they themselves indirectly maintain the control over the quality of academic processes.

Agencies in Europe more and more tend to combine different types of quality assurance processes (audit, assessment, accreditation with focus both on the programme and institutional level). This shows that quality assurance is a complex undertaking and one mechanism cannot fulfill the many related purposes.

The above-discussions of mechanisms and approaches developed recently under EQA schemes in Europe show that there is no clear trend indicating a shift of authority from one actor to the other. There is still a great variety of adopted options set up under predominant types of purposes and certainly a dichotomy of purposes of the QA systems set up in Western and Eastern Europe, given different traditions and current funding schemes. QA systems are, however, also transforming themselves with the adoption of accreditation and standards as one of the noticeable trends.

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