

ENQA training of agency reviewers

**European Standards and Guidelines (ESG)
national context and consistency**

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What should be borne in mind when conducting an evaluation of a QA agency for ENQA membership purposes?

National Context

“External QA agencies established and officially recognised as national agencies by a Bologna signatory state should normally be reviewed on a national basis, thus respecting the subsidiarity principle – even if they also operate beyond national borders”

ESG (2005)

Standards and guidelines

Standard:

- an acknowledged measure of comparison for quantitative or qualitative value; a criterion
- a degree or level of requirement, excellence, or attainment

Guideline:

- Recommended practice that allows some discretion or leeway in its interpretation, implementation, or use

Standards and guidelines

One can comply with a standard

One cannot comply with a guideline

ENQA membership

Each ENQA membership criterion is followed by guidelines which provide additional information about good practice. Although the guidelines are not part of the criteria themselves, the criteria should be considered in conjunction with them.

[\[Application form for membership of ENQA\]](#)

National context

ESG were drafted to try and accommodate all systems

- Principles-based versus rules-based legal systems
- ESG have to apply to accreditation, evaluation, audit systems
- Differing levels of autonomy of HEIs
- What is internal QA in one system is external QA in another (programme approval, for example)
- Different national legal issues to do with publication of information (33 of the 47 countries in the EHEA have some form of Freedom of Information legislation)

National context

- There may be occasions where a strict reading of the ESG would indicate substantial rather than full compliance with one or more standards, but a panel may come to the conclusion that this should not jeopardise an overall judgement of compliance
- This may occur when national legislation requires a different approach, or where an alternative way of achieving an objective is used, or because of other justifiable reasons
- That said, national governments in the EHEA do have an obligation to ensure that their national QA legislation (where this exists) is not inconsistent with the ESG that they adopted in 2005

Multiple purposes for review

National review of (all) functions of QA Agency

- As part of (statutory) review of agency

ENQA (full) membership (exclusive)

- For full membership (new members)
- For re-confirmation of membership (for existing members by September 2010)

EQAR listing (exclusive)

- For listing on EQAR

ENQA (full) membership review

- Undertaken according to ENQA document *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*
- Against ENQA membership criteria (ESG + additional criteria)

Review for listing on EQAR

- Undertaken according to EQAR document *Guide for Applicants*
- Against ESG solely

An external review of an agency must involve examining compliance with:

- the 3 Parts of ESG, linked one to the other
 - Part 3 , 8 standards
 - 6 corporate
 - 2 on external QA processes (**in Part 2**)
 - Part 2, 8 standards
 - 7 on external QA
 - 1 on internal QA in HEIs (**in Part 1**)

The review of an external QA agency must involve examining the operation of the agency (ESG: Pt 3) which should take into account the presence and effectiveness of the external QA processes that the agency operates on HE institutions (ESG: Pt 2) which must take into account the internal QA processes operating within the HE institutions (ESG: Pt 1)

Consistency in Agency Reviews:

- Report from EQAR Register Committee
 - Based on 25 applications (September 2009/October 2010)
- ENQA Board project
 - Learning from agency reviews: application of the ESG (published Spring 2011)

Compliance

The notion of compliance will be discussed in Padraig Walsh's presentation

[Even where a judgment of full compliance with an ENQA criterion/ESG standard is made, a panel may wish to make recommendations that the agency should consider in the development of its processes]

Consistency in Reports

EQAR Reports – **General** comments based mostly on an analysis of 13 applications (the first round)

*"The external review reports which the Register Committee (RC) has considered so far **vary widely** in their scope, details and readability in addressing the ESG and the terms of reference"*

*"**Most** external review reports considered by the RC **provide a clear and comprehensible analysis** of the reviewed agency's compliance with the ESG and **present a persuasive conclusion**, allowing the RC to make a confident decision fairly easily"*

- "A few reports have been found to be **too brief** or **overly simplistic** in arriving at the conclusion that an agency complies substantially with the ESG."*
- "Some reports make use of **rather creative arguments** in concluding that an agency complies with certain standards or consider national legislation in a **fairly generous manner** as a reason for not fulfilling the ESG." (In the 2010 report: "...the Register Committee noted that national legislation was **generously accepted as a reason for not complying with the ESG.**")*
- "For **virtually all applicants** the RC has identified some areas where substantial compliance with the ESG is **less obvious** than in others and/or its sustainability is **considered fragile.**"*

ENQA Criterion 1: Activities (ESG 3.1, 3.3)

Attention: take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines (ESG)

Consistency in Reports

EQAR Report (Sept 2009)

"In some external review (and self-evaluation) reports, the standards of ESG Part 2 were only dealt with under ESG 3.1 without referring to ESG 2.1-2.8 individually. This has sometimes rendered the process of identifying evidence for substantial compliance with ESG Part 2 more difficult for the RC as compared to external review reports that address ESG Part 2 standard-by standard"

EQAR Report (Oct 2010)

"Lately, the Register Committee has seen a positive development towards review reports which address ESG part 2 on a standard-by-standard basis."

ENQA Criterion 2: Official status (ESG 3.2)

Attention: formally recognised by competent public authorities in the EHEA

This is not usually a problem where the agency is established by, for example, an Act of parliament

Where this is not the case, the agency should have an established legal basis (e.g., as a guarantee company)

In some cases, such a body can be in receipt of state funding

ENQA Criterion 3: Resources (ESG 3.4)

Attention: *adequate and proportional resources, both human and financial*

This is (unfortunately) one of only 2 of the 27 ESG standards that has no linked guideline

However, it is difficult to see how this standard could be achieved without some minimum number of full-time staff

ENQA Criterion 4: Mission statement (ESG 3.5)

Attention: *have clear and explicit goals and objectives for its work, contained in a publicly available statement*

This statement should describe the goals and objectives of the member's quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of its work.

There should also be documentation to demonstrate how the statement is translated into a clear policy and management plan.

ENQA Criterion 5: Independence (ESG 3.6)

will be discussed in Josep Grifoll's presentation

Independence (ESG 3.6)

Specific comments in EQAR RC report

*"While most agencies could prove that they are independent from other bodies in their operation and decision-making, this independence was in some cases considered **potentially fragile** or **ambiguous**."*

*"In some cases, the RC had questions regarding **the independence of experts/reviewers** recruited by QA agencies and the effectiveness of mechanisms to rule out **conflicts of interest**"*

*"In a few cases, the robustness of report drafting procedures has been a matter of concern for the RC. This related to other bodies possibly **exercising undue influence** on an expert team's analysis and report"*

ENQA Criterion 6: External quality assurance criteria and processes (ESG 3.7)

Attention: *The processes, criteria and procedures used by the member should be pre-defined and publicly available.*

Processes will normally be expected to include:

- a self-assessment or equivalent
- an external assessment by **experts**, including **students**
- **publication** of a report
- follow-up procedure
- appeals procedure

External quality assurance criteria and processes (ESG 2.4, 2,5, 2.6 and 3.7)

Specific comments in EQAR RC report

"The participation of students in external QA is an area still under development in some cases. Most agencies involve students in one way or another, but there are different understandings of their role in detail (considered as full and equal partners), as observers or as members with different rights and responsibilities from others"

External quality assurance criteria and processes (ESG 2.4 and 3.7)

2.4 “the use of international experts” (is particularly noteworthy)

(further) specific comments in EQAR RC report

*“As far as **professional experts** (i.e. persons not working in a higher education institution) are concerned the situation is similar, sometimes **their participation is even less developed** than the participation of students”*

*“Not all QA agencies involve **international experts** in their expert teams and decision-making bodies. **Language barriers** are a prominent reason cited for not doing so”*

External quality assurance criteria and processes (ESG 2.4 and 3.7)

2.4 "published report"

3.7 "publication of a report, including any decisions, recommendations or other formal outcomes"

- What is permitted under national legislation?
- Are there constitutional or legal issues to do with publication
- What is published? Full report, summary, overview or outcomes

ENQA Criterion 7: Accountability procedures (ESG 3.8)

Attention: need for

- published policy for own IQA (on website)
- a no-conflict-of-interest mechanism for external experts
- ensure the quality of work of subcontractors
- internal and external feedback mechanism

Accountability procedures (ESG 3.8)

Specific comments in EQAR RC report

*"In many cases, **internal quality assurance** of quality assurance agencies is organised on an **informal basis**. However, many agencies have begun to develop clearly formalised and structured internal quality assurance systems"*

ENQA Criterion 8i, 8ii, 8iii: Miscellaneous

Attention:

- requirements and processes are managed professionally
- judgements and decisions are reached in a consistent manner
- having an appeals procedure
- contributing to the aims of ENQA

Advanced thoughts...

Tomorrow!

When we consider the report on reviews of agencies

Thank you for your attention!