

A discussion document pertaining to the presentation of Achim Hopbach “Reflecting on the future of quality assurance” on 18 October at 12.15.

Higher Education: a rapidly changing world and a next step for the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*

Introduction

The ESG, since their adoption in 2005 have made a significant contribution to achieving some ultimate goals of the EHEA, namely mutual trust in the quality of higher education provided, and the qualifications as basis for mutual recognition and mobility of students. This significance demonstrates how important a common framework for external quality assurance is for the development of the EHEA.

Since the adoption of the ESG we are witnessing the world of higher education evolve and, as it seems in ever-accelerating pace and with increasingly deep changes as regards purpose, nature and provision of higher education, and of the higher education institutions.

At the same time, we are witnessing a growing diversity of approaches to external quality assurance across the EHEA and beyond. This diversity covers the organisational and legal framework of external quality assurance, its purpose, subject focus, and methodology. In addition, quality assurance agencies show a great diversity as regards nature, remit etc.

These changing world of higher education and broader asks for a next step in the development of a common framework and understanding of the system of quality and external quality assurance, without spoiling the successes and values achieved so far. While, on the one side this seems natural and acknowledging that external quality assurance has admittedly always shown a high level of dynamism one has to acknowledge that the foundations of external quality assurance and the fundamental agreements as regards purpose, scope, methodologies and instruments haven't changed in the last 25 years.

A critical and self-critical discussion about the purpose, the principles, and the methodologies of external quality assurance is due in order to develop an EHEA-response to the current challenges and to the challenges ahead without spoiling the successes and values achieved so far by the ESG.

This paper wants to lay-out a rough analysis and some of the pertinent questions and topics to be discussed without aiming at being comprehensive. The paper is the result of discussions among colleagues from quality assurance agencies and consequently focusses on external quality assurance acknowledging that the discussion about the future of external quality assurance cannot be separated from similar discussions about internal quality assurance.

I. External quality assurance in higher education

The Bologna Process is one of the most influential reform agendas in the higher education systems of wider Europe; it had a very significant impact on the development of higher education in the European Higher Education Area (EHEA) and will likely continue to do so. Since quality assurance is one of the key commitments of the Bologna Process and one pillar of the European Higher Education Area this also applies to the development of internal and external quality assurance.

Starting with the self-commitment of ministers at the 2003 ministerial meeting in Berlin to implement national quality assurance systems that include, among others

- evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results, and
- a system of accreditation, certification or comparable procedures.¹

Tremendous efforts have been made to design and implement external quality assurance procedures for degree programmes and to link these to various kinds of state approval of degree programmes. This focus of external quality assurance on learning and teaching was determined by the original limitation of the Bologna Process to degrees and to degree structures.

The adoption of the ESG at the 2005 ministerial conference in Bergen re-confirmed this focus and paved the way for convergence of external quality assurance procedures based on principles for the design of the review methodologies. The adoption of the revised ESG 2015 emphasized this focus even more. On the one hand the purpose of the revision was to enhance „their clarity, applicability and usefulness“, while the originally foreseen revision of its scope was omitted, hence no fundamental modifications were introduced. On the other hand, references to the implementation of other instruments of the Bologna Process such as qualification frameworks, ECTS, etc. were added which strengthened the focus on learning and teaching.

Over time, in several EHEA countries, the focus in external quality insurance shifted from the programme- to the institutional level. In some cases, the perspective of quality assurance at institutional level was broadened to include other missions than education alone. Although the ESG allows for such a shift, ESG maintains an emphasis on programme evaluation, from an external and/or an internal perspective.

Consequently, the common practice in external quality assurance of higher education is characterized by reviews of degree programmes and/or institutional arrangements, supporting educational quality.

The purpose of external quality assurance is often referred to as “the twin purposes of *accountability* and *enhancement*. Taken together, these create trust in the higher education institution’s performance. A successfully implemented quality assurance system will provide information to assure the higher education institution and the public of the quality of the higher education institution’s activities (accountability) as well as provide advice and recommendations on how it might improve what it is doing (enhancement). Quality assurance and quality enhancement are thus inter-related.”²

The main principles applied in external QA over the past years are:

- Main responsibility of HEI: In taking account of the main responsibility of HEI for quality of their provision and for quality assurance, the basis for any kind of external review is a self-evaluation by the reviewed programme or HEI.
- Peer review: Expertise of and review by peers is at the core of the methodologies. A broad concept of peers is applied, including students and practitioners from the labour market.
- Transparency: Methodologies and standards used, as well as the outcomes have to be published.
- Cyclicity: Reviews have to be repeated on a cyclical basis.

Over the past 10-15 years, the ESG had an important function in developing and safeguarding quality of higher education throughout the EHEA. In combination with other ‘Bologna-tools’, such as the qualifications framework, recognition based on the Lisbon Recognition Convention, and ECTS, the ESG have set a minimum standard, a threshold for quality in HE programmes, have stimulated improvement in quality of HE in many countries and have guaranteed important basics such as involvement of students in quality assurance procedures. As a consequence, ESG make a significant contribution to achieving the goals set for the Bologna Process such as recognition of qualifications and mobility of students by way of creating

¹ ESG, p. 5, https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

² ESG p. 7.

and fostering trust and mutual understanding among the higher education systems and the HEI in the countries of the EHEA.

The ESG had also an obvious and a significant impact at organisational level by going beyond standards for external quality assurance and adding standards for the actors in external quality assurance. Consequently, existing bodies, such as quality assurance agencies modified in order to comply with the ESG and new agencies were set up based on the implicit model underlying the ESG. As a result, most countries or higher education systems have national quality assurance agencies whose organisational structure and governance comply with the ESG, and that are independent from undue external –in particular political and state-influences.

Based on the inter-relation of the three parts of the ESG, and due to the fact that a successful external review against the ESG is the core element of recognition of quality assurance agencies at European level and beyond, the external reviews of agencies de facto turned into reviews of the national quality assurance systems. Although originally not intended, this development added even more relevance to the reviews, and in addition it strengthened the application of principles such as autonomy and independence of quality assurance agencies.

Above all the ESG facilitated a common understanding of quality assurance among all parties involved, namely higher education institutions, teachers and students, quality assurance agencies, ministries and other public authorities, and other stakeholders.

II. The current state of development of external quality assurance: Between Convergence and Diversity

Despite the focus and impact of the ESG and the obvious convergence in the design of many external quality assurance procedures in the last twenty years one has to acknowledge a diversity of approaches to external quality assurance in the higher education systems of the EHEA. This diversity goes beyond the notion of diversity that has always been enshrined in the ESG by stating that “the ESG may be used and implemented in different ways by different institutions, agencies and countries. The EHEA is characterised by its diversity of political systems, higher education systems, socio-cultural and educational traditions, languages, aspirations and expectations. This makes a single monolithic approach to quality and quality assurance in higher education inappropriate.”³

The diversity covers:

- Diversity in organisation of the quality assurance system: In some systems a quality assurance agency is the main or even sole actor in the field of external quality assurance whereas in other systems more actors or instruments are used such as national student surveys, various reporting systems, system-wide analyses of key performance indicators or other types of usage of data. In particular as regards the transparency-function of external quality assurance one has to acknowledge that the use and analyses of data by other external bodies affects the ‘traditional’ role of quality assurance agencies.
- Diversity in purpose: In some quality assurance systems the purpose of reviews is first and foremost public recognition or approval/licence to operate of programmes or higher education institutions by assuring that certain standards and priorities are met, and accountability, especially for public money spent on higher education. In other systems reviews are conducted first and foremost in order to support the development of programmes or fully autonomous and self-accrediting higher education institutions without any links to formal approval.

As a consequence, the boundaries of external quality assurance become blurred as far as the purpose is concerned. In practice this means that on the one side there are procedures whose ‘pure’ quality assuring functions are complemented or even dominated by regulatory or accountability functions that are rooted in formal, public characteristics or refer to certain political priorities that

³ ESG p. 8.

might not be linked to quality of provision in the narrow sense. On the other side there are procedures that predominantly support the development of programmes and institutions without any regulatory aspects. Nevertheless, both approaches are subsumed under one concept of quality assurance.

- Diversity in subject focus: In many national quality assurance systems external quality assurance follows a comprehensive approach by going beyond the limitation to learning and teaching and instead addressing more or even all areas of activities of the HEI. In doing so the comprehensive approach takes into account that the design and delivery of programmes which normally follow institutional policies and take also into account the interrelations or even interdependencies of the HEI's activities, including research and third mission. Normally speaking, the internal management and quality assurance systems as such do not necessarily have to differentiate in their approach to the several activities of an institution. Hence a broader approach to external quality assurance would fit the logic of the internal quality assurance and internal management systems of many institutions.

In addition, in many national quality assurance systems external quality assurance comprises more than just one approach but various procedures of which some might address the programme level, and some might address the institution as a whole or just its internal quality management system.

- Diversity in methodology: External quality assurance makes use of other instruments and methods than peer review alone, such as national student surveys, quantitative or qualitative analyses of data, regular monitoring, and non-cyclical procedures such as risk-based approaches which form an important part of the procedures but are not addressed by the ESG.

In addition, quality assurance agencies show a much greater diversity as regards nature, remit etc than one could expect since most of them undergo external reviews against the ESG. This diversity covers:

- Diversity as regards the legal framework: Whereas some higher education systems have one nationally recognized agency conducting one type of review, other systems foresee more than one agency and/or more than one procedure. Some agencies don't have any national legal framework but act at discipline or at regional or international level. Very often linked to this, some agencies are statutory bodies and publicly funded whereas other agencies are private service providers based on the market model and dependent on commercial fees.
- Diversity as regards remit: Some agencies' remits go beyond external quality assurance of programmes and cover other activities of HEI, functions like ENIC/NARIC, research and analyses, data collection, rankings, other educational sectors and/or levels, law enforcement in other than quality-related agendas. Consequently, part of the activities of agencies are left out of consideration in ESG review procedures. Other agencies' remits foresee a division of responsibilities with other actors.

Despite this diversity the ESG broadly present a 'one size fits all' approach to these agencies that is based on an assumption of 'one national agency' conducting one type of procedure. Further, even where ESG permit diversity, its interpretation by some actors can be narrower and its use by agencies remarkably diverse.

III. Higher Education in motion

Let us turn now to the object of quality assurance, higher education. We observe changes in society and in the political field, we are working in. Demand for, and access to higher education increases tremendously, not only in the EHEA but also, and even more, in other regions of the world. The weight of higher education is shifting towards the east, China and south-east Asia. Globalisation influences the world of higher education in many ways, and at the same time on the other hand political tensions across Europe and in the world increase. Higher education (and research) remains one of the fields that allows for peaceful exchange and collaboration in an ever more complicated world. The world of higher education is evolving and, as it seems in ever-accelerating pace and with increasingly deep changes:

- Massification of higher education continues.

- New modes of delivery spread: flexible and personalized education, several forms of blended learning are ever more important, an increasing importance of life-long learning, joint programmes, higher education provision crossing borders and recently, the rise of 'credentials'.
- Digital access to advanced information changes the nature of higher education
- Sometimes competing tensions such as demand for skills seems to outweigh the demand for knowledge for some.
- The growth of non-traditional providers
- The rising numbers of fraudulent providers such as degree mills and thesis mills create a ubiquitous challenge
- IC-Technology is already affecting the provision and experience of higher education and will cause a substantial transformation.
- In Europe, it seems that there is no clear choice between private and public funded higher education, however it is obvious that in many European countries with traditionally public higher education systems it seems increasingly difficult to maintain an adequate level of public funding, given other competing demands from defence to health care or sustainability.

The question whether traditional HE institutions will be able to maintain their function in delivering recognized degrees might sound provocative at the moment. Does this also apply to five or ten years from now? The higher education institutions are undergoing substantial changes:

- Competition as one of the traditional driving forces ever gains importance, and increasingly on a global basis.
- Diversification of profile, partly as a consequence of competition, partly driven by political agendas increases. This includes diversification as regards mission: elitist vs broadened access approach, regional vs international orientation, engagement in third mission vs 'ivory tower' or teaching vs research.
- HEI have to make stronger contributions to fulfilling political agendas, not the least contributing to find solutions for the global challenges such as climate change, consequences of population growth, global peace, flight and expulsion. Ironically, this political pressure can lead to convergence in mission and function as well as distinctiveness.
- The institutional structures and governance are changing, partly as a consequence of diversification: one campus vs multi-campus possibly incl. cross-border provision, centralized vs decentralized.
- Management changes: Common to many HEI is a raising level of autonomy that leads to professionalisation of management and also to a strategic relevance of (internal) quality assurance. Consequently, the management capacity and systems have are developing and improving. In particular internal information management systems allow for much more elaborated evidence-based management of HEI than in the past.
- As a counterbalance to a raising level of autonomy HEI's are held more and more accountable for their activities and have to show that they take responsibility in this perspective.

Although external quality assurance has proven to be an equally dynamic field, it is questionable whether these significant or even fundamental changes are addressed adequately by external quality assurance whose general principles and procedures haven't changed. On the other side the question arises whether external quality assurance needs to explicitly address all such changes. Particularly as regards the above mentioned legitimate political agendas and priorities one has to ask whether these should be dealt with in external quality assurance, or via other instruments, such as performance contracts or funding arrangements between government and institutions.

IV. Conclusion

These developments in the world of higher education and broader ask for a next step in the development of a common framework and understanding of the system of quality and external quality assurance, without spoiling the successes and values achieved so far. External quality assurance needs to be able to address these developments and to adapt. While, on the one side this seems natural and acknowledging that external quality assurance has admittedly always shown a high level of dynamism one has to acknowledge that the foundations of external quality assurance and the fundamental agreements as regards purpose, scope, methodologies and instruments haven't changed in the last 25 years.

However, one also has to acknowledge that a careful analysis of the current ESG reveals a philosophy of diversity and flexibility as regards methodologies and provides room for innovation already. In particular the guidelines to the various standards demonstrate that ESG don't call for a one-size-fit-all approach, on the contrary. But all actors in external quality assurance, ENQA panels, governments, EQAR and agencies themselves, have to admit self-critically that the application of the ESG often looks different. Their often overly narrow interpretation of the Standards and Guidelines sometimes inhibit agencies from innovating and adapting to new circumstances which, consequently, can act as a constraint on institutions. Most of the standards are thresholds that agencies have to comply with but there is a danger that the guidelines, originally designed to identify a range of effective practices, are becoming rules that should be rigidly applied regardless of national or institutional contexts. If such a rigid approach continues it threatens continued confidence that the ESG can be a unifier across a broad range of national and organisational contexts. Moreover, some standards may have to be reconsidered, given that ESG was originally based on the idea of one national agency, looking especially at the quality of degree programmes, delivered in the traditional mode.

The recently published self-evaluation of the ENQA review process of agencies demonstrates some of the weaknesses observed. Consistency of reports, the application of guidelines, the relatively small panels and the double decision-making process of ENQA and EQAR are among the issues that could be improved. Discussions are going on about the interpretation of the requirement of thematic analysis, requirements for internal structures, for activities outside the EHEA etc. etc. All these issues have in fact led to numerous discussions about interpretation of ESG and lack of opportunity to innovate.⁴

Consequently, a new framework alone will not be the solution to current problems. Also, a meaningful application of such a framework that keeps a balance of standardization –if necessary- one the one hand and inevitable flexibility and room for innovation on the other hand will be the responsibility of all partners involved in external quality assurance.

V. The concept of external quality assurance revisited and a future common framework for external quality assurance

1. Also in the future the EHEA needs a common framework for (external) quality assurance

The significant achievements of the ESG demonstrate how important a common framework for external quality assurance is for supporting some ultimate goals of the EHEA, namely mutual trust in the quality of higher education provided, and the qualifications as basis for mutual recognition and mobility of students. The public function of external quality assurance requires common principles and well defined, clear, and simple, etc. standards also in the future. Because of the growing diversity of higher education institutions and of provision of programmes the relevance not only of such common principles and standards but also shared values grows even bigger in the future.

⁴ <https://enqa.eu/wp-content/uploads/2019/06/ENQA-Agency-Reviews-SAR-final.pdf>

2. Requirements for a common framework for external quality assurance in the future

By and large the underlying principles of the ESG like cyclical, independence, and transparency, knowledgeability, involvement of relevant external stakeholders, fairness and due procedures will remain valid also in the future. In addition, external quality assurance has to meet the following requirements:

- External quality assurance has to be value driven.
- External quality assurance has to be based on differentiated concepts according to the various purposes
- External quality assurance has to allow for diversity in terms of methodologies and instruments.
- External quality assurance has to allow for flexibility in terms of conduct of procedures.

Differentiation of purpose of external quality assurance

A future framework for external quality assurance has to address differentiate explicitly the various purposes of external quality assurance. In a future framework this might result in different chapters for external quality assurance that is dominated by its public functions, especially accountability or regulation of qualification, programmes and eventually other activities or institutions themselves on the one side, and a more developmental procedures that first and foremost support higher education institutions and their activities.

The core questions read:

Does external quality assurance focus on compliance with certain legal requirements and on accountability?

- Does external quality assurance focus on academic quality?
- Does external quality assurance focus on learning and teaching?
- Does external quality assurance focus on outcomes for students?
- Does external quality assurance focus on the HEI as a whole?
- Does external quality assurance focus on the capacity of HEI to guarantee high quality provision?

External quality assurance at the level of an institution as a whole is mostly focused on the capacity of HEI to guarantee high quality provision in learning and teaching or in all its activity fields, and achieve its own strategic and operational goals;

In the public approach the issue of quality normally would be complemented by a combination of compliance of programmes or institutions with certain legal requirements and effective and efficient use of public money;

The more external quality assurance is linked to or equals regulatory functions at programme level like state approval of degree programmes the more the exclusive focus on the quality of programmes and their compliance with legal requirements can make sense.

The more the whole learning-process and its embeddedness in the academic activities of a HEI is concerned the less a fractionalized procedure addressing only one programme makes sense.

Methodological innovation

A future framework for external quality assurance has to allow for a broader range of methodologies.

The methodologies to be applied have to be aligned to the function and to the focus of external quality assurance, and the methodologies used should be up to date. It seems obvious that the developments regarding provision of information on higher education institutions and their activities, and regarding the evaluation and assessment of this information raises the question whether the methodologies agreed upon in the early 1990' are still up to date. It is questionable whether the methodological quartet self-evaluation – peer-review - site visit - published report is still the best or even appropriate choice for the diverse functions.

While recognizing the value of this methodology new methods are available, like analysis of (big) data, other sources of information, thematic analysis and other forms of research. These allow for an innovation of external quality assurance. Inclusion of new methods will enable external quality assurance work to be more efficient and effective, adapt to the several developments in education, focus actual issues at institutions, and reducing administrative workload where possible. This is especially true at the institutional level. ESG were developed for quality assurance at programme level, and more or less expanded to the institutional level. However, there needs to be room for a more tailor-made approach of quality assurance at institutional level for all activities of an institution.

Diversity and Flexibility

A future framework for external quality assurance has to build on the principles of diversity and flexibility as appropriate.

- Following the principle of diversity, a future framework for external quality assurance needs to allow for a differentiation according to the purposes of external quality assurance. Careful attention has to be observed as regards standards for methodologies and instruments. Designing them fit for purpose might lead to different methodologies and instruments for regulatory procedures that form the basis for approval and/or funding decisions and that fall under the definition of quality assurance on the one side and methodologies and instruments for procedures that predominantly serve the purpose of supporting HEI in enhancing its quality or developing its structures, policies or activities further.
- Following the principle of diversity a future framework for external quality assurance needs to allow for a differentiation according to the subject matter of quality assurance which can range from certain fields of activities like programmes or outreach, a combination of these, to the whole institution or certain relevant aspects of recent and future developments. Careful attention has to be observed as regards standards for methodologies and instruments.
- Following the principle of flexibility, a future framework for external quality assurance needs to allow for a differentiation in the conduct of a procedure. While applying a basic level of necessary and natural standardization as regards subject matter, core set of standards and underlying values etc. there needs to be room to adapt the conduct of an individual procedure to the current framework conditions of the given programme or institution in order to be able to address specific issues that might not be covered by the standardized approach or in order to be able to omit issues that are not relevant. Whereas the need for fully standardized conduct of procedures that primarily serve the public function tends to be high more flexibility might be given in procedures that shall support the HEIs in reflecting about their activities and performance and that shall support the HEIs in their further development.

Common principles

A plea for innovation of ESG certainly does not mean that all basic principles of the present ESG have to be abolished. A next version of ESG, or any other future framework for quality assurance will have to be based on a number of common principles such as:

Cyclicalit

A future framework for external quality assurance shall maintain cyclicalit as a relevant principle of external quality assurance. Cyclicalit of external quality assurance is however confused with cyclicalit (sometimes rigidity) of a certain procedure. Instead, innovative approaches to the concept of cyclicalit are due. The stage of development of an institution, a unit, an activity, or a programme and possible specific circumstances of an external review can make repetition of the same procedure meaningless. A shift from programme to institutional level, a shift from control-dimension to development dimension, and other shifts can be appropriate and will have significant impact on the necessary design of the external quality assurance system.

Independence

External quality assurance needs to be trustworthy: therefore, it should be free from political or commercial or any other undesired external influence; this means that it will always have to be provided by independent organisations. Relevant stakeholders, like students, trade unions or employers should be involved in an independent role.

Transparency:

In order to fulfil its function, external quality assurance should be knowledgeable and transparent: strategies, procedures and reports and decisions are published and easily available to the public, procedures offer room for complaints, objections and appeals.

Quality assurance agencies

A future framework for external quality assurance shall take into account that quality assurance agencies differ substantially in terms of legal status range of activities (also outside quality assurance). Hence a future framework has to assure that the relevant standards are applied to external quality assurance procedures without hindering the agencies' activities outside external quality assurance.

As we demonstrated above, import changes in the EHEA have taken place since the first development of ESG. After modest adaptations in 2015 it is now time for a more thorough revision of the ESG, taking into account the changes that have taken place in the field of higher education, especially in the EHEA, with regard to institutions for higher education and quality assurance agencies, and in the available methodologies of quality assurance.

Our call is to open the discussion on a next and up to date version of standards for quality assurance.

This document is the result of discussions between Douglas Blackstock, Michel Cosnard, Anne Flierman, Achim Hopbach, Oystein Lund, and Pdraig Walsh.