
Report by an ENQA review panel

Quality Assurance of Higher Education in Portugal

An Assessment of the Existing System and Recommendations for a Future System

ISBN 952-5539-15-6 (PAPERBOUND)

ISBN 952-5539-16-4 (PDF)

ISSN 1458-1051

This is the final report of the ENQA review of the accreditation and quality assurance practices in the Portuguese higher education (EPHE) and will be published in the series of ENQA Occasional Papers.

The EPHE project has been funded by the Portuguese Ministry of Science, Technology and Higher Education (MCTES).

The present report can be downloaded from the ENQA website at <http://www.enqa.eu/pubs.lasso>

© European Association for Quality Assurance in Higher Education 2006, Helsinki

This publication may be photocopied or otherwise reproduced without permission of the publisher.

Cover design and page layout: Eija Vierimaa

Helsinki, Finland, 2006



Table of contents

Foreword.....	5
1. Executive summary.....	6
Abbreviations.....	12
2. Introduction.....	13
2.1 Background.....	13
2.2 Mandate.....	14
2.3 Organisation	14
2.4 Documentation	15
2.5 Content of the report.....	17
3. The national context	18
3.1 The national system for higher education	18
3.2 Regulation of higher education	19
4. The existing quality assurance system for higher education	21
4.1 Historical background	21
4.2 Roles and responsibilities.....	22
4.3 The content of the legal framework	23
4.4 Organisational structure	23
4.5 Independence.....	24
4.6 Methodological model.....	26
4.7 Focus	31
4.8 Coverage and scope	31
4.9 Involvement of stakeholders	32
4.10 Follow-up	32
4.11 Information on labour market and employability.....	33
4.12 Major conclusions on strengths and weaknesses	33
5. Accreditations conducted by professional associations	36
5.1 Professional associations conducting accreditations	36
5.2 Methodological model.....	37
5.3 The consequences of professional accreditations	37
5.4 Strengths and weaknesses	38
5.5 Future	39
6. Conditions for a new Portuguese quality assurance system	40
6.1 Mandate of the ENQA panel.....	40
6.2 The basis for the recommendations of the ENQA panel	40

7. Key issues and recommendations for a Portuguese quality assurance system	42
7.1 Quality assurance terminology	42
7.2 National versus international accreditation.....	43
7.3 Methods and levels of a Portuguese quality assurance system	45
7.4 One strong national agency	47
7.5 Independence of the agency	48
7.6 Data and information system.....	49
7.7 Cross-sector reviews	50
7.8 Professionalism and consistency in the work of the quality assurance agency	50
7.9 Use and role of experts	52
7.10 Use of international experts.....	53
7.11 Inclusion of students in the quality assurance process.....	54
7.12 Stakeholder involvement	55
7.13 International cooperation and networking.....	55
7.14 Internal accountability procedures and compliance with the European standards	56
7.15 Pre-accreditation, accreditation and relevance	57
7.16 Financing of the new quality assurance agency.....	58
7.17 The focus of the accreditation criteria.....	59
7.18 The process for defining the accreditation criteria	60
7.19 Categories of accreditation decisions and follow-up	60
7.20 Consequences of accreditation.....	61
7.21 Length of the accreditation cycle	62
7.22 The need for an appeals forum for accreditation decisions	63
 Appendices	
Appendix I – Terms of reference.....	64
Appendix II – ENQA panel.....	68
Appendix III – Professional associations.....	70
Appendix IV – Site visit programme	71
Appendix V – Summary list of European standards for quality assurance	76
Appendix VI – Overview of recommendations	80
Appendix VII – Budget for the quality assurance agency	85
Appendix VIII – Criteria for accreditation of university study programmes and polytechnic study programmes	90

Foreword

In 2005 the Portuguese government invited ENQA to appoint a panel of international experts with two interrelated tasks. First, to review the existing Portuguese quality assurance practices as conducted by the Portuguese National Council for the Evaluation of Higher Education, CNAVES. Secondly, to provide recommendations to the Portuguese government on the organisation, processes and methods of establishment of a national accreditation system which would meet the European Standards and Guidelines for Quality Assurance in the European Higher Education Area.

The Board of ENQA accepted this invitation and appointed an international review panel.

The following report presents the results of the panel's work on its double task. It is our hope that the conclusions and recommendations of the panel will serve not only as a platform for the future Portuguese quality assurance system, but also as an inspiration and benchmark for other national quality assurance systems.

Peter Williams
ENQA President

Christian Thune
Chair of the review panel

1. Executive summary

The purpose of this report is to review the past and present external quality assurance for higher education in Portugal and to recommend a future quality assurance and accreditation system that meets the standards for quality assurance in the European Higher Education Area. The review was carried out on the initiative of the Portuguese Ministry of Science, Technology and Higher Education (MCTES) which requested ENQA to appoint an international panel to conduct the review.

During the review process, the Portuguese government announced that the present evaluation system will be dismantled by the end of 2006 and replaced by a new system for accreditation by the beginning of 2007. This initiative parallels activities in a growing number of European countries that are applying quality assurance systems for higher education that are based on an accreditation approach. The panel is, however, convinced that the new system would benefit from a broader quality assurance approach than one based exclusively on accreditation.

The panel has completed a review of the past and present system in accordance with the agreement with MCTES, and the European standards for the review of external quality assurance agencies have formed the basis for the review process. Considering the fact that the European standards were only recently adopted by the relevant ministers of the Bologna signatory countries, the current quality assurance agency, the National Council for Evaluation of Higher Education (CNAVES), cannot in all fairness be expected to have developed its organisation and processes according to those standards. However, it has been the conclusion of the panel that the review would suffer from a serious lack of transparency and comparability if the standards were not applied as the frame of reference for the review.

Overall conclusions

Quality assurance of higher education in Portugal has been based on the Higher Education Evaluation Act 1994. This act was closely developed in cooperation with the Conference of Rectors of Public Universities (CRUP) and forms the backbone of what is widely termed “the contractual model”. The act resulted in the establishment of CNAVES as a national agency for quality assurance of higher education.

The act was highly inspired by the Dutch model and retains many characteristics from this, including, above all, placing responsibility for the quality assurance system with an organisation representing the institutions of higher education.

The contractual model, which reflects the large extent of institutional representation through the representative entities and evaluation councils, has created a strong sense of ownership and commitment to the quality assurance processes, which would otherwise have been extremely difficult to achieve. The model was fit for purpose at the time of its establishment, but was from the early days also associated with a number of weaknesses, which are analysed in this review.

Ten years of CNAVES’s evaluations have, however, also accumulated a number of positive experiences that should be considered carried over into a new quality assurance system.

The major strengths and weaknesses of the past and present quality assurance system identified by the panel are summarised in the following.

The major strengths include:

ESTABLISHMENT OF A SELF-EVALUATION CULTURE

The evaluation processes have contributed to the build up of a self-evaluation culture at many higher education institutions. A number of institutions have developed their own internal quality assurance systems as a result of CNAVES's evaluations. The evaluations have further assisted many institutions in becoming more reflective about their practice, and the institutions have made their education programmes more transparent to the public and students. The panel therefore believes that the future quality assurance system should maintain a strong focus on quality improvement.

APPROPRIATE METHODS

The methodological model applied by CNAVES is in principle appropriate and in many respects in compliance with European standards and practice. The model contains most characteristics of other European models and includes self-evaluation, external review by external experts, a site visit and a published report. The model should, therefore, in outline continue in the future quality assurance system.

ASSURANCE OF A MORE EQUAL REPRESENTATION OF SUB-SECTORS

The existing quality assurance system is comprehensive and includes all higher education institutions; public/private and universities/polytechnics. The inclusion of the private sector in CNAVES's evaluations has helped improve the recognition and reputation of the sector. To some extent, the division into four evaluation councils has contributed to a more equal representation between the sub sectors in the quality assurance processes, though this is not fully realised. Although the panel strongly recommends a comprehensive system for the future, the new quality assurance system should also be able to reflect the present divided structure.

The major weaknesses include:

LIMITED INDEPENDENCE

The European standards emphasise that agencies must be independent from ministries as well as from higher education institutions. The representative nature of CNAVES and the evaluation councils, with the strong domination of particularly the public universities, compromises the independence of the system.

The involvement of representatives of the public universities in the design process indicates clearly that the methods and procedures were not defined and developed in a manner that was sufficiently autonomous and independent of the higher education institutions.

Furthermore the procedures for the appointment and nomination of external experts are not sufficiently independent of either the institutions or the Ministry.

LACK OF SUFFICIENT OPERATIONAL EFFICIENCY AND CONSISTENCY

The two-tier organisational structure that includes CNAVES as the meta-organ and the evaluation councils as the operational organisations is complex and has created an organisation that suffers from a certain level of operational inefficiency

and inconsistency. The many levels in the structure are time-consuming and result in an unduly complicated system detracting from the quality improvement purpose.

The limited staff capacity at CNAVES and the evaluation councils has reinforced these weaknesses. As a consequence of the two-tier structure, the technical and administrative support is fragmented in several secretariats. The few support staff in CNAVES and in each council do not have the capacity to provide a proper quality control of the processes. The consequence is a limited degree of consistency in evaluation processes and in the final reports prepared by the various expert teams.

LACK OF CONSEQUENCES

A crucial deficiency of the existing quality assurance system is the lack of consequences or follow-up on evaluations. The distinct lack of follow-up is due to a number of factors. The passiveness on the part of the Government is a major part of the explanation as is the lack of commitment from higher education institutions. But CNAVES's lack of activity does also bear part of the responsibility. Follow-up visits to discuss reviews and to explore what institutional actions have been taken in response to the reviews could also have been undertaken by CNAVES itself, and this would have been consistent with the professed goal of self-improvement. Additionally, the fact that the reports have often been formulated in a vague manner, without clear conclusions and recommendations, has further constrained the possibility for follow-up.

The evaluations are cyclical, with a first round from 1995-2000 and a second round from 2000-2005. The cyclical basis had in principle provided some sort of feed-back on the follow-up to the previous evaluations, but this has evidently not been the case. The evaluations in the second round did not cover or reflect the results from the first round. On the other hand it should be added that a third cycle was in the planning that would have addressed several key problems identified during the first two cycles.

RELIANCE ON NATIONAL EXPERTS

The reliance on national Portuguese experts poses a problem. The pool of Portuguese experts is limited and, as is generally the case with academic communities in small countries, there is often considerable familiarity between reviewers and the reviewed. This combination potentially compromises the necessary independence and objectivity of the external evaluations. Secondly, the dominant use of national experts has limited inspiration from experts with an international background and perspective.

Major recommendations

On the basis of the ENQA panel's review of the experience with the present system, the panel agrees that a system change is now due regarding quality assurance of Portuguese higher education. The recommendations in the report specify the panel's view on the direction and specific content of these changes. The basic change is the introduction of a new accreditation system. The ENQA panel defines the purpose of the new accreditation system to be partly the obvious one of assuring that

quality at higher education institutions meets the requirement of the government and stakeholders and provides institutions with benchmarks on which to build their further development. But the panel wishes to emphasise that accreditation must also make the quality of Portuguese higher education programmes transparent and comparable in an international context. Only in this way can Portuguese higher education secure its place in the global context of higher education, and thereby the necessary international mobility for staff and students.

Higher education has, namely in a global context, begun to take on some of the characteristics of a market place, and the new accreditation system must be designed to support efforts to attract the best staff and students from abroad and to provide access for Portuguese staff and students in academically attractive institutions abroad.

Therefore, the starting point for the ENQA panel is that the coming quality assurance system must comply with the code of practice expressed in the European standards. On this overall background, the panel recommends to:

COMBINE ACCREDITATION WITH ACADEMIC AUDIT AT INSTITUTIONAL LEVEL

The decision of the Portuguese government to establish a new agency for accreditation should not preclude a combination of programme accreditation with, for instance, academic audit at institutional level. It is the opinion of the panel that a mature quality assurance system should operate at both programme and institutional level.

A combination of different quality assurance methods will make it possible for the Portuguese government to include in its design for quality assurance both the element of control (accreditation) and the element of improvement (academic audit).

ESTABLISH ONE STRONG INDEPENDENT NATIONAL AGENCY FOR QUALITY ASSURANCE

The panel's recommendation for a future quality assurance system is a single one-tier system. The agency should be responsible for accreditation as well as for audit processes. The tasks should be combined in one comprehensive agency to ensure a strong financial and staff base, and to benefit from the synergy between accreditation and academic audit.

The agency must be truly independent of the government and higher education institutions. A small independent board with members appointed in their personal capacity should guarantee the independence of the agency. The board should be government appointed, but on the basis of a procedure that secures representation in relation to Portuguese society and higher education institutions. The board should be vested with the authority to make accreditation decisions. The membership of the board should reflect established professionalism in overseeing quality assurance processes.

To ensure a wider involvement of relevant stakeholders in quality assurance, the board should be supplemented by an advisory council with representatives of relevant stakeholders, including higher education institutions, employer organisations and professional associations.

ENSURE OPERATIONAL INDEPENDENCE OF A NEW QUALITY ASSURANCE AGENCY THROUGH A LEGAL FRAMEWORK

The operational independence of the agency should be rooted in official documents, e.g. a legislative act, which is the case in most European countries. The mandate of the new agency should be clearly described in the legal framework. At the same time, the legal framework should be formulated in a way that allows a certain degree of flexibility in the development and operation of the agency, e.g. determination of standards, adjustments in procedures, etc.

ENSURE PROFESSIONALISM AND CONSISTENCY IN THE WORK OF THE QUALITY ASSURANCE AGENCY

The credibility of external quality assurance processes depends on a high level of professionalism in the agency responsible. The level of credibility is closely related to the consistency between processes. Therefore, the European standards emphasise that quality assurance agencies should have adequate human and financial resources to match the tasks they are required to perform.

The agency should have a strong, highly qualified staff with experience in quality assurance and with knowledge of the higher education system. The professional staff of the agency should carry a major obligation for the consistency of operational processes and reporting.

This is especially important in relation to programme accreditations, which may otherwise suffer from the fact that different experts may view various elements differently and arrive at their own individual interpretations of the standards.

CREATE A QUALITY ASSURANCE SYSTEM WITH CLEAR CONSEQUENCES AND WELL-DEFINED PROCEDURES FOR FOLLOW-UP

Consequences of accreditation and follow-up procedures in connection with academic audit should be clearly defined in the legal framework, and the agency should be responsible for providing the higher education institutions with proper information concerning the practical implications.

An accredited programme should in the coming Portuguese system be ensured public funding and grants to the students. An accredited programme should also give the programme provider an added position of strength in the global market and thus attract researchers and students from abroad. Likewise, failure to obtain accreditation will involve a number of consequences – typically loss of financial grants or loss of the right to provide those specific programmes.

The agency should be responsible for overseeing the follow-up on academic audits by carrying-out follow-up visit to discuss and explore what actions institutions have taken in response to a review.

USE OF INTERNATIONAL EXPERTS

It is an element in the European standards that European external quality assurance systems should be encouraged to open their processes as much as possible to international expertise. In many European countries the inclusion of international experts is now being introduced. The new agency should ensure that international experts are invited as members of the expert panels in order to

bring in an outside perspective and increase the credibility of the panels. The new agency should therefore itself be ensured sufficient funding to cover the added costs involved in basing quality assurance processes in a non-national language.

ABOUT THE RECOMMENDATIONS

The recommendations summarised above reflect the panel's main priorities in relation to the establishment of a future quality assurance system. The report thus contains more recommendations than those summarised here. All of the recommendations will be presented in chapter seven. Furthermore, Appendix six contains a list of all recommendations.

Abbreviations

AACSB	<i>Association to Advance Collegiate Schools of Business</i>
ABET	<i>Accreditation Board for Engineering and Technology</i>
ADISPOR	<i>Evaluation Council for Public Polytechnics</i>
ANET	<i>Association for Technical Engineers</i>
APESP	<i>Evaluation Council for Private Universities and Polytechnics</i>
CCISP	<i>Council for Polytechnics</i>
CNAVES	<i>National Council for Evaluation of Higher Education</i>
CRUP	<i>Conference of Rectors of Public Universities</i>
DGES	<i>Ministry of Science and Higher Education</i>
ECA	<i>European Consortium for Accreditation</i>
ENQA	<i>European Association for Quality Assurance in Higher Education</i>
EHEA	<i>European Higher Education Area</i>
EU	<i>European Union</i>
EUA	<i>European University Association</i>
EUR-ACE	<i>Project for Accreditation of European Engineering Programmes</i>
EQUIS	<i>European Quality Improvement System</i>
FUP	<i>Evaluation Council for Public Universities</i>
INQAAHE	<i>International Network of Quality Assurance Agencies in Higher Education</i>
MCTES	<i>Ministry of Science, Technology and Higher Education</i>
OE	<i>Order of Engineers</i>
OECD	<i>Organisation for Economic Cooperation and Development</i>
UK	<i>United Kingdom</i>
US	<i>United States</i>
VSNU	<i>The Evaluation Agency of the Dutch Association of Universities</i>

2. Introduction

The Portuguese government decided in 2004 to launch an extensive, independent and objective assessment of the Portuguese higher education system. The assessment should be conducted following international criteria and with the goal to guide the reorganisation and rationalisation of the system.

This exercise was structured in three main tasks:

- The Organisation for Economic Cooperation and Development (OECD) was commissioned to undertake the overall assessment of the Portuguese higher education system and its policies.
- The European Association for Quality Assurance in Higher Education (ENQA) was invited to appoint a team of international experts to firstly review past and current Portuguese quality assurance practices as conducted by the Portuguese National Council for the Evaluation of Higher Education, CNAVES and including the related activities of “Representative Institutions”. Secondly to provide recommendations that could ensure the establishment of a national accreditation system meeting the European Standards and Guidelines for Quality Assurance in the European Higher Education Area.
- In addition to these two tasks, an exercise of institutional evaluations was launched, which will become the ultimate responsibility of the higher education institutions themselves. The evaluations are run by the European University Association (EUA) in cooperation with the European Association of Institutions in Higher Education (EURASHE).

2.1 Background

MCTES drafted the terms of reference (see Appendix 1) and negotiated the contract with ENQA. In addition, the chair of the panel and the review secretary held a meeting with MCTES before commencing the review process to clarify outstanding issues and questions. MCTES was not involved in the review process as such, but provided logistical support in relation to the site visit.

The European standards and guidelines for the review of external quality assurance agencies have formed the basis of the review process. The standards are summarised in Appendix five and can be read in their full length in the ENQA report “Standards and Guidelines for Quality Assurance in the European Higher Education Area” available at ENQA’s website www.enqa.eu.

In accordance with the European standards, the key elements of the review process are:

- a self-evaluation by the Portuguese National Council for the Evaluation of Higher Education (CNAVES) and its four evaluation councils, and six accounts by professional associations;
- site visits by the ENQA panel;
- a public review report.

It is also in accordance with the European standards that the external ENQA panel has aimed to ensure that the review process is as transparent as possible, and that the process has allowed the institutions involved commitment and co-ownership.

2.2 Mandate

The review has a dual dimension. One task is to review the past and present evaluation system, and another task is to provide recommendations for a future accreditation system. Accordingly, the review provides an analysis of:

- The existing Portuguese quality assurance practices as evident in the work of CNAVES and in the related activities and procedures of the four Evaluation Councils.
- The review also takes into account the available knowledge of professional accreditation practices connected with professional educations, e.g. engineering and architecture.

Furthermore the report provides:

- Recommendations that will lead to the establishment of a national quality assurance system and practice. The system and practice, based on programme accreditation and institutional audit, will meet the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (EHEA), and, finally, will ensure appropriate academic and management structures for implementing adequate quality assurance and accreditation practice.

The Portuguese government has announced that the present evaluation system will be dismantled by the end of 2006, and replaced by a new agency for accreditation by the beginning of 2007. Decisions on the design of the future accreditation system await the recommendations of this ENQA review.

The ENQA panel has considered its mandate in the light of the terms of reference and recent developments concerning CNAVES. The panel does not consider these developments to imply any changes to the already agreed terms of reference for the review. Therefore, the panel has conducted the review of CNAVES according to the agreement with MCTES, and the panel's views and conclusions based on the lessons learned from the CNAVES period are brought into the recommendations for a future system.

The panel is convinced that this system will benefit from a broader quality assurance approach than one based exclusively on accreditation. Accordingly, the panel's focus is on a new quality assurance system incorporating both accreditation and other more improvement-oriented approaches.

2.3 Organisation

The ENQA review has been carried out by a group of international experts appointed by the Board of ENQA.

The members of the panel are:

- Dr. CHRISTIAN THUNE, Chair, Executive Director of the Danish Evaluation Institute (EVA), past President of ENQA;
- Professor DAVID DILL, Professor of Public Policy at the University of North Carolina;
- Professor HELMUT KONRAD, past member of the ENQA Board and past President of the Austrian Accreditation Council;
- Professor GEMMA RAURET, Executive Director of the Spanish Agency for Evaluation of Quality and Accreditation (ANECA);

- Dr. ANETTE DØRGE JESSEN, Review Secretary, Director of Projects at the Danish Evaluation Institute (EVA).

Ms. BRIT BUCHHAVE, MA, Communication Consultant at the Danish Evaluation Institute (EVA), participated in the site visit and provided secretarial assistance to the panel.

Further details regarding the panel members are provided in Appendix two.

On 30 January 2006, the panel organized a launch seminar in Lisbon for CNAVES and the Evaluation Councils, where panel members Christian Thune, Anette Dørgje Jessen and David Dill introduced the procedure and schedule for the review and the self evaluation manual for CNAVES. Later the same day, these panel members also held a meeting with representatives of the professional associations concerning their inclusion in the review process.

The ENQA panel held a one-day meeting 1 May 2006 in Copenhagen to discuss the self-evaluation documents of CNAVES and the professional associations, and to prepare for the site visit in May 2006. Furthermore, the panel convened for a one-day meeting in 4 September 2006 in Copenhagen to discuss the draft report. Further communication between the panel members has primarily been via e-mail.

15 September the panel sent CNAVES a first version of this report and invited comments on any factual errors or misinterpretations. Comments were also invited on the extent of the report's fulfilment of the terms of reference for the review. CNAVES and the Evaluation Councils gave their comments in written statements. 23 October 2006 the panel chair and the review secretary met in Lisbon with representatives of CNAVES and the Councils whose statements were discussed in an open and frank atmosphere.

On the basis of the statements and the meeting 23 October the panel has made adjustments to the report as presented here in its final version.

2.4 Documentation

Three main types of documentation have formed the basis for the review. Firstly, the self-evaluation report prepared by CNAVES and the accounts prepared by six professional associations, including appendices; secondly, the site visit to Lisbon; and thirdly, the MCTES provided extensive documentation in English on the Portuguese higher education system.

The views on the Portuguese system referred to throughout in the report are based on from the analysis of documentation by the ENQA panel. An important element of this documentation is the interviews with the stakeholders during the site visit

Self-evaluation

CNAVES conducted a self-evaluation, analysing the strengths and weaknesses of the past and present evaluation system and the evaluation procedures and processes. The self-evaluation was designed to fulfil two distinct aims:

- to provide documentation to be used by the ENQA panel in relation to the site visits and preparation of the final report;
- to stimulate discussions about strengths and weaknesses related to the focus areas of the review in order to ensure continuous improvement in the practice of the organisation.

The self-evaluation was carried out in accordance with a set of guidelines outlined by the ENQA panel. The questions in the guidelines were formulated in order to assess CNAVES' compliance with the European standards. The ENQA panel is conscious of the fact that the European standards were adopted by the relevant ministers of the Bologna signatory countries as late as May 2005, and that CNAVES cannot, therefore, in all fairness be expected to have developed its organisation and processes according to the standards. However, ENQA drafted the standards in accordance with generally agreed and shared best practice among European quality assurance agencies. Furthermore, it is an important dimension in the European standards that agencies must be regularly reviewed in terms of their compliance with the standards.

Accordingly, it has been the conclusion of the ENQA panel that the review of CNAVES would suffer from a serious lack of transparency and comparability if the standards were not applied as the frame of reference for the review. The panel cannot of course expect full compliance of the present system with the standards, but it is the view of the panel that the standards may nevertheless function very adequately if interpreted as relative benchmarks for the quality and relevance of the Portuguese quality assurance system

CNAVES and its four evaluation councils submitted their self-evaluation report at the end of April 2006. The ENQA panel recognizes the report as a valuable and comprehensive insight into the recent Portuguese quality assurance system. The report should be applauded for its satisfactory level of critical self-reflection and for its outline of the main strengths and weaknesses of the system and the key issues, from CNAVES' point of view to be addressed by a future system. Many of the critical observations made by the ENQA panel in this report may also be identified in the CNAVES self-evaluation report itself. This testifies to the excellent work effort of the CNAVES self-evaluation group. It should finally be mentioned that the report further benefits from the extensive and representative written documentation supplied as annexes.

Accounts

Six professional associations accepted the invitation to submit a brief account of their accreditation activities and plans. These accounts provide valuable knowledge of the experiences, competences, concerns and expectations of the professional associations towards a future accreditation system. The ENQA panel has especially noted the impressive account of the Professional Order of Engineers concerning their elaborate and extensive accreditation work. A list of the six professional associations is provided in Appendix three.

Site visit

The site visit took place between 14-19 May 2006. The programme for the visit was designed to ensure that both aspects of the review exercise were duly covered. The panel had drafted the programme and set up criteria for the selection of higher education institutions to be visited. In order to ensure that all relevant stakeholders were included, the MCTES had subsequently added a number of meetings for the approval of the ENQA panel. As a result the final programme was very comprehensive, but therefore also very rewarding in terms of the insights and understanding gained by the ENQA panel.

See Appendix four for the programme for the site visit.

2.5 Content of the report

In addition to this introductory chapter 2, the report contains six chapters.

Chapter 1 provides an executive summary of the main conclusions derived from the assessment of the existing quality assurance system, and a summary of the most important recommendations for the design of a future quality assurance system.

Chapter 3 analyses the national context for higher education in Portugal. Chapter

4 provides an analysis of the past and existing quality assurance system; chapter 5

concerns the professional associations; chapter 6 outlines the conditions for a new

quality assurance system; and chapter 7 provides specific recommendations for a new

Portuguese system.

3. The national context

3.1 The national system for higher education

In comparison to other EU countries, Portugal has a distinctive history and structure to its higher education system. An analysis of the existing and possible future quality assurance system in Portugal must, therefore, take into account these characteristics as well as the dynamic changes currently underway.

The higher education system in Portugal is binary, comprising university institutions and polytechnic institutions, which can be public or private. There are more than 150 higher education institutions. The public sector includes 14 universities and a non-integrated university institution; 15 polytechnics and a number of polytechnic schools integrated in universities; 9 non-integrated nursing schools; 4 university-level military schools; and 5 polytechnic military schools. The private sector includes 34 university level institutions and no less than 66 polytechnics. The private sector also includes a Catholic university¹.

The university and polytechnic subsystems are mainly differentiated by their formative role in research, as is seen, for example, also in Denmark and the Netherlands. The polytechnics are vocationally or professionally oriented and do not carry out fundamental research as the universities do. Only applied research is conducted at the polytechnics.

The number of higher education institutions expanded rapidly in the eighties and early nineties as a response to an increase in student enrolment. The number of students in higher education institutions has grown from 30,000 in the sixties to nearly 400,000 in 2000². The expansion of higher education was mainly seen in the private sector and particularly in the polytechnic subsystem, as the present high number of polytechnic institutions makes evident.

The expansion of the higher education system is also reflected in a large number of undergraduate courses and study programmes. In 2004, the total number of undergraduate study programmes was 1,763, of which 647 were offered by public universities, 58 by the Catholic university, 299 by private universities, 532 by public polytechnics and 227 by private polytechnics³.

A recent and projected downturn in enrolments has led to a marked imbalance between supply and demand for higher education study programmes. The result is enhanced competition across the higher education sector and has increased the need both for a more effective means of assuring academic standards as well as for more effective institutional management and governance.

It is a shared view among stakeholders in Portugal that the uncontrolled expansion of the higher education system and, in particular, of the private sector has affected the quality of the education and compromised the credibility of the system. There was a national consensus in the early nineties to establish a national quality assurance system,

¹ Tertiary Education in Portugal: Background Report prepared to support the international assessment of the Portuguese system of tertiary education, April 2006, page 106.

² Tertiary Education in Portugal: Background Report prepared to support the international assessment of the Portuguese system of tertiary education, April 2006, page 9.

³ Source: Self-evaluation report of CNAVES, April 2006

to guarantee a minimum level of quality of existing study programmes. This system is the main object of this review. It can be said at this stage that the system was probably fit for purpose at the time of its establishment. However, from its early days the system was also associated with a number of weaknesses. Chapter four of the report includes a thorough analysis of the existing system's strengths and weaknesses.

3.2 Regulation of higher education

The higher education system in Portugal is regulated through a number of degree laws⁴. The common fundamental principle of the degree laws is the prevalent autonomy of the public universities. These universities are, in terms of the law, entitled to statutory, scientific, pedagogical, administrative and financial autonomy. This means that the universities have almost complete freedom to initiate, suspend or cancel study programmes. The Ministry of Science and Higher Education (DGES), which holds the formal responsibility for the universities, registers all new study programmes and degrees. With the University Autonomy Act of 1988, this approval process was reduced to a bureaucratic procedure without any actual impact. The Ministry is only entitled to refuse study programmes or degrees if they are inconsistent with formal requirements in terms of duration of the programme or number of total credits needed to obtain a degree. Regardless of this, decisions are not based on evaluations or accreditations.

The autonomy of the public polytechnic institutions is almost similar to that of the universities, but the procedure for approval of new study programmes is somewhat more restrictive. The public polytechnics are not allowed to create new study programmes without a formal approval by the Ministry. They are obliged to submit all proposals to the Ministry (General Director for Higher Education at the Ministry of Science and Higher Education) for approval. The proposals are subjected to a technical review at the Ministry where the compliance with formal requirements in terms of duration and number of credits is tested. The review usually takes about a year.

The private universities and the private polytechnics are regulated through the Private and Cooperative Higher Education Act. The institutions must be officially recognised in order to award degrees. The procedure for approval of new study programmes and degrees is much more restricted compared to the approval process applied to the public universities and polytechnics. The approval procedure can take up to four years and includes not only a ministerial technical review but also an academic review by an external expert committee. The prolonged duration of the approval process is due to the extended process for feed-back from the expert committees. However, there is no clear evidence that this extended procedure has improved the quality of new study programmes provided by the private sector, but it has undoubtedly created a more self-disciplinary behaviour in terms of number of applications for approval of new study programmes. This assumption is substantiated by the relatively low number of undergraduate study programmes offered by private institutions compared with the number of undergraduate study programmes offered at public institutions, even though the number of private institutions is substantially higher (see previous section).

⁴ The comprehensive act for the education system (act 46/86 of 14 October); The University Autonomy Act (act 108/88 of 24 September); the Autonomy of Polytechnic Higher Education Institutions Act (act 54/90 of 5 September); the Private and Cooperative Higher Education Act; etc. (see page 10-11 in CNAVES Self-Evaluation report).

The actual number of new degree study programmes registered at DGES illustrates the difference in the approval procedures between the private and public sector. In 2005, a total of 141 new degree study programmes for public universities were registered. In comparison, 61 of a total of 157 degree programme applications from private institutions were approved, and 43 of a total of 94 for public polytechnics.⁵

Due mainly to the extended self-regulating mechanism of the public universities, the provision of new study programmes suffers from a lack of national steering and effective coordination. The implication is a large and inflated higher education sector that was previously absorbed by an increasing demand, due to a high degree of student enrolment. However, this has now changed due to a considerable decline in the number of new students, and the situation calls for stricter regulation and a more consistent system of quality assurance.

Combined with the development of recent years in Europe (in particular, the Bologna process), these factors formed the background for the Government decision to launch a new degree law in March 2006. An important element of this degree law is the provision of a legal framework for the establishment of a national accreditation system. The accreditation system is to guarantee a more efficient regulation of the provision of new study programmes and ensure a consistent system for the quality assurance of all existing study programmes within the higher education system. In chapter seven of this report, detailed recommendations for the design of a quality assurance system are provided.

⁵ Tertiary Education in Portugal: Background Report prepared to support the international assessment of the Portuguese system of tertiary education. A working Document, April 2006, MCTES (page 64).

4. The existing quality assurance system for higher education

4.1 Historical background

Quality assurance of higher education in Portugal has been based on the Higher Education Evaluation Act (act 38/94), which was passed by the Parliament in November 1994. The law was closely developed in cooperation with the Council of Rectors of Public Universities (CRUP) and forms the backbone of what is in Portugal widely termed “the contractual system”.

As stated earlier in the report, the rapid development in the number of higher education institutions, particularly in the private sector, seemed to affect the quality of the education and raised the need for establishing a national quality assurance system. Especially the public universities regarded a national quality assessment system as a guarantee of their quality, vis-à-vis the private sector. In 1993, CRUP launched a pilot project involving five scientific disciplines: physics, computer sciences, electrical engineering, economics and French. The pilot project was designed with assistance from the Dutch agency for the evaluation of universities (VSNU) and the research institute CHEPS from the Dutch University of Twente. The pilot project was comprehensive and involved all public universities and the Catholic university. Simultaneously, a range of seminars were organised for the rectors, the faculty deans and the representatives of the institutions under review. The seminars were organised with assistance from VSNU and focussed on procedures for the preparation of self-evaluation and external evaluation.

The procedures discussed were highly inspired by the so-called Dutch model. The Dutch university organisation VSNU had in 1988, in agreement with the Dutch government, set up an agency for cyclical evaluation of university study programmes. What the Dutch over the coming years presented across Europe as their model was partly based on the argument that a national external quality assurance agency must, like the VSNU, be owned by the universities themselves in order to ensure that evaluations furthered the improvement perspective of universities, and not the control perspective of government. This argument did not convince other contemporary European agencies, which were government owned, but still considered their activities to be improvement oriented.

The Portuguese acceptance of the Dutch model was in terms of organisation reflected in the fact that a declared independent evaluation council was set up within the Foundation of the Portuguese Universities (FUP), resembling the model of VSNU, to activate the evaluation processes. The methodological framework, involving a two-phase process of self-evaluation followed by on-site peer review, was a copy of the Dutch model as well.

The pilot project and the seminars were carried out in agreement with, and with support from the Ministry of Higher Education and provided the basis for a dialogue between CRUP and that Ministry. The latter was at that time responsible for higher education institutions. Later in 1994, this dialogue resulted in the approval and publication of the Evaluation of Higher Education Act. The act provided a legal framework outlining the general characteristics of the quality assurance system.

Due to the complexity of the Portuguese higher education system (universities and polytechnic, both public and private), it was decided that the detailed requirements for a quality assurance system should be negotiated with each of the sub-sectors of higher education. In consequence, the Ministry signed protocols defining the rules of operation for quality assurance systems within each sub-sector, and these recognised the establishment of representative entities each with its own evaluation council: The Evaluation Council for Public Universities (FUP), The Evaluation Council for Public Polytechnics (ADISPOR); and The Evaluation Council for Private Universities and Polytechnics (APESP).

The members of the evaluation councils include: a chairperson appointed by the representative entity; one person of recognised merit appointed by the Minister; three persons of recognised merit appointed by the representative entity; two professors appointed by the coordinating body of the respective higher education sector; one member of the representative entity's governing body; and two students from the students' unions. The fact that the membership was thus weighted towards representatives from the four higher education sectors did open the independence of the councils to questions.

To co-ordinate these sub-systems, and to ensure the harmony, cohesion and credibility of the overall system, a meta-level organisation was established in the form of the National Evaluation Council for Higher Education (CNAVES). In that way, a complex and differentiated two-tier system for quality assurance was established. Already from the beginning, the system was associated with a number of challenges in terms of operational efficiency, consistency and independence. These challenges will be dealt with in more detail in the following sections of the report.

4.2 Roles and responsibilities

The two-tier model includes an operational level consisting of the evaluation council and a meta-level organisation with the overall responsibility for the coordination of the evaluation processes and for consistency between the sub-systems. The model is certainly complex, but the respective responsibilities of the two levels may be broken down as follows:

The specific responsibilities of evaluations councils are to:

- organise and coordinate the external review process;
- propose to CNAVES the composition of the peer review panels;
- propose to CNAVES the guidelines for the self-evaluation process;
- monitor and support the development of the self-evaluation process;
- ensure the publication of the external review reports as well as any refutations offered by the institutions whose study programmes are assessed;
- issue suggestions and recommendations with the aim of stimulating quality and improving the evaluation model.

The specific responsibilities of CNAVES are to:

- appraise the global coherence of the quality assurance based on a comparative study of the evaluation reports;
- appoint review panels based on the coordination of the proposals from the evaluation councils;

- ensure that the same review procedures apply in each field of study, both in the public and the private sectors of each sub-system;
- ensure that the same guidelines for self-evaluation are applied within each subsystem, allowing, however, for differentiation between the subsystems;
- produce global and prospective reports concerning quality assurance in higher education as well as issue recommendations for the rationalisation and improvement of the higher education system.

4.3 The content of the legal framework

The Evaluation Act 1994 retains most characteristics of the Dutch model, primarily by placing the responsibility for the quality assessment system with an organisation representing the higher education institutions. In this way the evaluation system strengthens institutional autonomy, particularly that of the universities. In the process of importing the Dutch model, it was not taken into account that in the Dutch case a government inspectorate effectively supervised the processes and results of VSNU. The Ministry may have been expected to take such a role upon itself, but the Ministry obviously refrained from imposing on the CNAVES run system, even in cases where it had the formal background for doing so, as described below.

The methodological framework is treated in more detail below in section 4.6. The self-evaluation of the programme under review is placed in the centre of the quality assurance process, followed by external review teams. This, too, is presented as a copy from the Dutch model. It should be mentioned, however, that this procedure was by 1994 already an element in the state-of-the-art practices in all European national quality assurance systems in place. Other characteristics similar to the Dutch model are that the system is national (all higher education institutions are involved), periodic (cyclical reviews) and comprehensive (all disciplines and study programmes will be assessed). Students are invited to participate in the quality assurance activities and the review teams are formally obliged to take into account the opinions of the students. The final evaluation report is made public and the draft report should be subject to a hearing process at the institutions responsible for the study programmes under assessment.

The evaluations are cyclical. The first round (cycle) of external evaluations of study programmes took place between 1995–2000 and included the public university sector. The polytechnics and the private universities were first included with the second round that took place between 2000–2005.

The law clearly states that in the first round of evaluations there should be no direct link between the results of the evaluation and the level of funding. However, in case of successive negative evaluations or lack of follow-up on recommendations, the Government can take one or more actions in terms of decreasing or suspending funding, suspending degree awarding, etc. As is mentioned in section 4.10 concerning follow-up, the Government has never used this possibility.

4.4 Organisational structure

The two-tier organisational structure is complex and has created an organisation that suffers from a certain level of operational inefficiency and inconsistency. However, as stressed in several interviews during the site visit, the complexity in the system was borne out of the prevailing mood at the time it was established. Autonomy had very recently been won by the higher education institutions, and they had little inclination

to reduce autonomy on a key issue such as external evaluations. Therefore strong interests among the higher education institutions argued to be represented at all levels of the system, while the government of the day avoided taking responsibility for the system.

On the other hand it must be strongly emphasized that the contractual model, which reflects the large extent of institutional representation through the representative entities and evaluation councils, has created a strong sense of ownership and commitment to the quality assurance processes on the part of the institutions. This commitment would otherwise have been very difficult to achieve.

Another justification for the complexity of the system relates to the institutional diversity of the Portuguese higher education system. The division into four evaluation councils has to some, even if certainly not full extent, contributed to a more equal representation between the four sectors (public/private, universities/polytechnics) in the quality assurance processes. During the site visit, this perspective was especially emphasised by representatives from the private sector and the polytechnics. They recognise this issue as one of the major advantages of the two-tier system. In other words, the divided structure has prevented a total domination by the public sector, especially the public universities (and CRUP) that are very influential in the Portuguese higher education system.

The private institutions and the polytechnics have never obtained the same degree of political influence. For the latter, this is further underlined by the observation made during the site visit that the Council for Polytechnics, CCISP, is generally perceived as a significantly weaker political stakeholder than its university counterpart (CRUP).

The major weaknesses in terms of operational inefficiency and inconsistency seem to be recognised by all relevant stakeholders including CNAVES. CNAVES itself critically analyses these problems in its self-evaluation report.

The many levels of involvement in the evaluation processes cause the operational inefficiency. The various levels include CNAVES as the meta-organ, the evaluation councils as the operational organisations and the external experts (reviewers) that are further divided into a two-layer structure of review panels and review teams. The complexity in the operational structure is further underlined by the fact that MCTES has to approve the members of the review panels and teams. The many levels in the structure are time-consuming and provide a system of bureaucratic control, detracting from the quality improvement purpose.

The limited staff capacity at CNAVES and the evaluation councils reinforce these weaknesses. As a consequence of the organisational structure, the technical and administrative support is fragmented into several secretariats. The few support staff (on average three) in CNAVES and in each council do not have the capacity to provide a proper quality control of the processes. The consequence is a limited degree of consistency in evaluation processes and in the final reports prepared by the various expert panels.

Consequently, CNAVES has not been able to adequately fulfil its main role as a meta-organisation monitoring the global coherence of the quality assurance.

4.5 Independence

The independence of quality assurance agencies is a key requirement of the European standards. The standards emphasise that agencies must be independent from ministries

as well as from higher education institutions and other stakeholders. Independence is, however, not a one-dimensional concept. This is partly due to the fact that in many European countries, including Portugal, higher education and the quality assurance agencies are funded and regulated by governments. Therefore, one important distinction lies between organisational independence on the one hand, and operational independence on the other. The standards do not imply that agencies should have no formal connections with ministries, higher education institutions or other stakeholders (i.e. be totally organisationally independent), but the operational independence of an agency should be unambiguous and guaranteed in official documents.

Operational independence requires that the definition and operation of procedures and methods, the nomination and appointment of external experts, and the determination of the final outcomes, e.g. conclusions and recommendations, are undertaken autonomously and independently.

The four elements that enable an understanding of operational independence can thus be summarised:

- unambiguous guarantees in official documents;
- independence in the definition and operation of methods and procedures;
- independence in the nomination and appointment of external experts;
- independence in the determination of outcomes.

Guaranties in official documents

The operational independence of CNAVES is partly assured through the legal framework regulating the quality assurance system. CNAVES was established with the Degree Act 1998 recognising CNAVES as the national coordinating body, with delegated responsibility for the credibility of a national quality assurance system. However, it can be claimed that the representative nature of CNAVES and the four councils has compromised the independence of the organisations from the higher education institutions.

Definition and practice of methods and procedures

CNAVES and the four respective councils have developed a common framework of guidelines for the self-assessment and external reviews. The guidelines are comprehensive and include all relevant aspects in relation to evaluation processes. The process by which the guidelines were developed is described in the self-evaluation report of CNAVES. From this it appears that the guidelines were developed and coordinated by a standing committee under CRUP with representatives from each university. The private universities were also invited to provide input through APESP. The evaluation councils for the polytechnic institutions (ADISPOR and APESP) were not directly involved in the formulation of the guidelines, but these two councils subsequently adopted the guidelines. Neither the Ministry nor the professional associations or other stakeholders were significantly involved in the discussion or preparation of the guidelines.

The establishment and development of quality assurance systems has in most European countries included the necessary dialogue among authorities, agencies and stakeholders, including not least higher education institutions. If such a dialogue is based on mutual openness and trust it can be a strong mover towards a well working system. But it is also important that the system is credible in terms of its independence

and therefore the line must carefully be drawn between dialogue with and undue influence from the higher education institutions. The involvement of representatives from the public universities as outlined above indicates clearly that the evaluation methods and procedures were not defined and developed in a manner that was sufficiently autonomous and independent from the higher education institutions.

Nomination and appointment of external experts

Independence in the nomination and appointment of experts is another critical issue in the Portuguese context. Formally, the appointment of experts is the responsibility of CNAVES. However, the appointment is based on recommendations from the four councils that invite the institutions (under assessment) to propose names. In the case of the public universities, proposals are submitted to FUP by the Advisory Thematic Committees in each of the study fields, which are composed of representatives from the member universities. Only in very few cases has CNAVES dismissed the nominations of the councils. MCTES finally approves the names.

CNAVES has formulated a set of criteria for the selection of experts. One of these criteria concerns conflicts of interests and states that the experts may not have any formal relations with the institutions under evaluation or family ties with directors or teachers at the institutions.

As indicated above, the formal procedures of CNAVES cover the issue of independence (no conflicts of interests) in the appointment of each specific expert team. However, the general process and the influence of the institutions in proposing names makes evident that appointment of experts does not take place independently of either the institutions or the Ministry. This seems to be generally recognised as a highly critical problem by most stakeholders engaged in quality assurance of higher education in Portugal, and an issue that was repeatedly confirmed as problematic during the site visit.

It should be added, though, that the issue raised is not meant to imply that the experts involved necessarily lacked independence or honesty. The implication is that there are no formal procedures in the system to ensure that this is not the case.

Determination of outcomes

The final outcome in terms of conclusions and recommendations of the evaluation process should be the responsibility of the agency. However, this does not imply that the institutions under review are prevented from providing comments to the draft report. On the contrary, the higher educations should be consulted prior to the finalisation of the report. The procedure of CNAVES is in compliance with the European standard. The institutions are invited to comment on factual errors for correction or to contest the report by presenting a refutation. The review panel can then decide to introduce corrections to the report or to keep it unchanged. The final report and the refutations are published on the websites of both CNAVES and the respective council. The publication of the refutations adds positively to the transparency of the process.

4.6 Methodological model

The methodological model applied in the evaluation processes is thoroughly described in the self-evaluation report of CNAVES. Some of the elements that belong to the

methodological model, e.g. nomination and appointment of experts, were addressed in the previous section and will thus only be presented here briefly.

The elements in the model will be described and assessed against part two of the European standards and Guidelines (where relevant), which concerns external quality assurance of higher education. According to the guidelines (standard 2.4) the quality assurance agencies in Europe undertake different external processes for different purposes and in different ways. However, there are some widely used elements of external review processes, which not only facilitate the validity, reliability and usefulness of the agencies, but also form the basis for the European dimension to quality assurance. These elements concern:

- Institutional improvement as a fundamental element in the quality assurance;
- Experts;
- Student participation;
- Self-evaluation/site visit/draft report/published report/follow-up as the significant elements in external evaluation processes.

Institutional improvement

According to the CNAVES self-evaluation report, the main objective of the quality assurance system is to contribute to the improvement of quality within the higher education institutions, while fostering responsibility and accountability towards society. The element of self-evaluation validates the improvement perspective in the evaluation process. The site visit provided clear evidence that the self-evaluation processes have brought a cultural change to many higher education institutions and a greater awareness of democratic processes, e.g. how to include students in the development of the institutions. The evaluations, especially those conducted in the first round of evaluations from 1995–2000, have contributed to building up a self-evaluation culture at many institutions, which has continued after the completion of the external evaluation process.

The improvement perspective was seemingly stronger in the first round. That phase was considered as an experimental phase focusing on the learning process to build up ownership towards an external quality assurance system, and to develop an evaluation culture at the institutions. Institutional improvement was a major concern at this point, while the issue of accountability played a secondary role.

However, this changed gradually with the second round which took place from 2000 to 2005. In that round, a rating scheme to reinforce the accountability dimension was applied on a trial basis. The study programmes were assessed against fourteen fields and achieved an assessment score within each field ranging from “excellent” to “negative”. The rating system, however, never worked as intended due to a high degree of inconsistency in the reports and in the interpretation of the ratings by the various expert panels. The issue of inconsistency will be further elaborated in the following section on experts.

Profile of experts

The issue of independence in the nomination and appointment of experts is addressed in section 4.5 of the report and will thus not be discussed further here.

The reliability of an external evaluation process depends to a high degree on the competences and credibility of the expert teams. According to the European standards,

attention should be given to the skills and competences of the expert teams, to the careful selection of the experts, to the provision of appropriate briefings and training, and to the use of international experts.

According to the self-evaluation report, CNAVES gives priority to experts that are recognised as experts in their field of research and who possess a certain academic rank (preferably full professors). On the one hand, these concerns are justified in order to achieve the necessary legitimacy, particularly at the universities. On the other hand, they favour one specific type of competence at the expense of other highly relevant professional skills such as experience with quality assurance and knowledge of the labour market. Moreover, CNAVES and the four councils do not have mechanisms to verify the assumed quality of the skills and competences of the experts by inviting appraisals of potential experts from other independent sources. The performance of the experts is evaluated by the chairman of the panel, but the performance of the chairman is not itself subject to evaluation.

The CNAVES guidelines for external reviews of both subsystems address explicitly the organisation of the work of the review panels, including the meetings to be held by the expert team. The type and frequency of the meetings seem appropriate and sufficient, and include:

- a preliminary meeting within ten days of receipt of the self-evaluation report to discuss the preparation of the external review, including working methodology, division of tasks, analysis of the self-evaluation and identification of the need for further information from the institutions;
- a second meeting that takes place three weeks after the preliminary meeting, with the aim of deepening the analysis of the self-evaluation reports and preparing comments and questions to be addressed during the site visit;
- a third and final meeting to discuss and approve the report from the external review.

While the frequency in meetings between the panel members is appropriate and comparable to standards of other European agencies, the training of experts is insufficient, with implications for the consistency of the reviews. Due to the limited staff capacity of CNAVES and the four councils, training is limited to one annual preparatory meeting. For the university sector, this meeting includes, in principle, all members of the panel, whereas in the polytechnic system, it only includes the chairpersons and vice-chairpersons. However, during the site visit, the ENQA panel gained the impression that it was only in a few exceptional cases that all members (or a majority of them) attended this meeting. In a quality assurance model like the Portuguese one, where the responsibility for drafting the external reports relies on the external reviewers, proper training and briefing is crucial in order to obtain the required consistency and level of professionalism.

In this respect, CNAVES's evaluation process has failed. One example to illustrate the implication of insufficient training is the differentiation in the application of the rating scheme that was introduced in the second round of evaluations. According to the CNAVES self-evaluation report, the rating scheme has led to somewhat heterogeneous approaches by the different review panels. The inconsistency is also seen in the structure of the reports, where great varieties pose difficulties in the comparison of results. There is an obvious risk that the experts are subjective and biased in their

approach, with a tendency to view and evaluate a programme on the basis of their own home institution programme.

One frequently noted weakness of the experts is the degree of reliance on reviewers from Portugal. CNAVES stresses that a measurable percentage of international evaluators was utilized in the reviews and increased over time. CNAVES also notes that it did not have the authority to require reviews in English, which would be necessary for foreign teams. Many of those interviewed observed that Portugal was a “small country”, and that reviewers and the reviewed frequently knew each other well, and this sometimes compromised the independence and objectivity of the external reviews. Also that many Portuguese faculties are in-bred (composed primarily of their own graduates), and, therefore, that Portuguese higher education needs the stimulation provided by the introduction of European standards and practice.

Private institutions were particularly outspoken in the need for international reviewers. They noted that almost all of their external reviewers came from the Portuguese public sector (i.e., their competitors) and often appeared biased against private programmes. Finally, while there was strong support for international reviewers among both private and public institutions, there was also widespread support for CNAVES' view that members of external review teams need to be knowledgeable about Portuguese culture and the system of higher education.

An increased use of international experts would of course add substantially to the costs and work involved in the process, but, at the same time, would create a much more credible quality assurance system for two main reasons. Firstly, it would add an international comparative dimension to the external quality processes, which is normally not achieved by using purely national expert teams. Secondly, it would fortify the impartiality and independence of the review teams by expanding the potential pool of experts.

It should be added that for a number of years a very strong argument has been established for adopting international experts, as these have been the backbone of the external reviews initiated by the Portuguese government for research units. The ENQA panel had during the site visit the opportunity to meet several key individuals involved in, or with experience of, the research review exercise. The feedback to the panel was very clearly that the exercise had been successful and credible especially due to the use of non-Portuguese experts. Obviously the research reviews have acted very positively as catalysts for an increased awareness of the implications of successful external reviews.

Student participation

In Portugal, student unions are an important actor in the higher education system, as a consequence of the 1974 revolution. Following this event, students now participate at all levels of institutional governance.

In the quality assurance of higher education, students are also formally playing an active role at all levels. Students are formally represented in CNAVES, the four councils and other committees engaged in quality assurance, e.g. the Bologna Committee, but their real influence is limited. During the site visit the students argued that they are not being listened to in CNAVES or the councils, where the majority of the members are senior academics.

In the quality assurance processes, the students have never managed to manifest themselves as a key player - neither in the internal self-evaluation processes nor

as members of the external review teams. However, the role of students in quality assurance is not only constrained by the resistance of the institutions to involve students, but also by the fragmented structure of the students' organisations and by a degree of non-assertiveness and lack of commitment on the part of the students. A less differentiated organisation would potentially provide a stronger basis for the influence of students at all levels. At the same time it must be added that the influence of the students in the quality assurance process constitutes also a problem in a large number of European national quality assurance systems.

Self-evaluation/site visit

Appropriate and comprehensive guidelines for the self-evaluation and site visit have been prepared by the evaluation councils for both subsystems and approved by CNAVES.

The guidelines for self-evaluation are almost identical for the two subsystems but are slightly more detailed for the polytechnics, the latter perhaps due to the fact that the polytechnics first joined the existing quality assurance system in the second round from 2000 to 2005. The guidelines reflect a proper balance between the need for factual description and critical self-evaluation. Moreover, the guidelines include a standardised format for the presentation of data in order to facilitate a systematic and homogeneous presentation of data. In addition to the format, the guidelines include procedural advice on, for instance, the composition of the self-evaluation groups. Concerning the guidelines to institutions, CNAVES has confined itself to recommendations and has acknowledged that the composition of the self-evaluation groups is an internal matter for the institutions. The ENQA panel does, however, consider it a mistake that institutions did not receive clearer directions on these and other issues. One obvious example could be to have unmistakably conveyed to institutions that students should join the self-evaluation groups and be given an active role.

The procedures for site visits are defined in the guidelines for external reviews and include all relevant aspects in relation to the organisation of a site visit. The procedures include a format for the terms of reference for the site visit, interview protocols and a draft site visit schedule.

In summary, the guidelines for self-evaluation and site visit are generally appropriate and in compliance with the European standards.

Report

The external review reports are drafted by the various expert teams themselves, and the staffs of the evaluation councils have no role in the drafting or approval of the reports. Guidelines for the structure of the reports exist, but they are often not followed by the various teams, as was made evident during the site visit. The result is an obvious risk of inconsistency in structure as well as style. In other words, the variety of the reports makes it difficult for general readers to combine and compare results of the individual reports and to arrive at an understanding of quality across programmes.

The writing style of the external review reports is another concern, which was raised by a number of persons during the site visit. The reports are often formulated in a vague manner, without clear conclusions and recommendations. This can either be explained by the limited impartiality of the review teams (friends evaluating friends) or as a result

of an inconsequential evaluation system. This latter issue will be further elaborated in section 4.10 regarding follow-up.

Accordingly, the format and content of the reporting does not fully comply with the European standard 2.5 which stresses that the reports should be written in a style which is clear and readily accessible to its intended readership. The standard further stresses that any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Publication of final report

The final reports are published on the web sites of both CNAVES and the evaluation councils in compliance with the European standards.

CNAVES has, however, seemingly not been very successful in making evaluation processes and results apparent and known to the Portuguese society.

4.7 Focus

The guidelines for the self-evaluation and external reviews include relevant concerns about programme curricula, teaching and student performance as well as quality assurance. However, these guidelines are rather different from the Dutch approach that served as the model for the reviews, and which was particularly concerned with the quality of teaching and student learning in academic programmes. The categories of the CNAVES reviews, as well as the sample reports themselves, focus much more on programme capacity, including the numbers and compositions of academic faculties and staffs as well as the adequacy of facilities and equipment. The Dutch reviews focused to a greater extent on programme goals, the structure and content of the curriculum, student assessment, the quality of student work, and methods of quality assurance.

This difference is also obvious in the global or summary reports produced in the two different countries. The Dutch published reports that included an extensive discussion of the nature of teaching and curricula in each subject field, while the CNAVES global reports appear to primarily contain summaries of the team judgments of each programme. The potential for using the study programme reviews to share issues and discovered best practices in curricula content, teaching, and student assessment in each subject field appears not to have been exploited. In comparison, the teams carrying out the Portuguese research evaluation reports included discussions of the state of research in each field assessed.

Predictably a number of Portuguese institutional leaders interviewed during the site visit reported frustration with the orientation of the CNAVES review recommendations, which seemed to emphasize personnel, resource, and facilities issues that they as institutional leaders could do little to address, rather than the academic curricula, teaching, and assessment issues where self-improvement might have been more feasible.

4.8 Coverage and scope

In the first round, a total of 376 study programmes were assessed, involving 14 public universities, the Catholic University and one university institute.

In the second round the number of study programmes assessed increased to a total of 1,209 divided between 596 in the university sector (432 public and 164 private) and 613 in the polytechnic sector (421 public and 192 private)⁶.

The first evaluation round between 1995-2000 was narrowly focussed on the programme level. From the second round, the focus gradually shifted to a study-field approach with grouping of study programmes (but still with a programme-oriented approach). For the university programmes, 44 fields of study were identified and the polytechnic system was grouped in 12 wider areas. A third round was planned from 2005, but in light of the Government's initiative to undertake a comprehensive international review of the higher education system and the quality assurance system, the process was put on hold. The panel received many comments on this during the site visit, and not only from CNAVES. The general point made was that the de facto moratorium on external reviews was highly problematic and de-motivated the champions of CNAVES's evaluation process – not least because CNAVES was pre-empted from putting its own revisions of its system in place.

The cyclical basis on which the study programmes were evaluated complies with European standard 2.7 concerning periodic reviews.

The level of coverage increased from the first to the second round. 376 university study programmes were assessed in the first round, and 596 in the second. This could indicate that the approach of grouping increased the efficiency of the system and thus the level of coverage, but the explanation is rather that the private university sector joined the evaluation system for the second round.

The panel is puzzled by the information received that there were no consequences in cases where higher education institutions simply did not wish to submit their study programmes to evaluation. Unlike the Ministry CNAVES had no tools to enforce participation. However it informed the Ministry regularly.

4.9 Involvement of stakeholders

Employers' organisations and representatives have not been very visible in the current quality assurance system. Even if employers have had some representation in CNAVES or in the evaluation councils their activity and participation have been low. Employers have been invited to join panels, though not to very great extent and recruitment has been difficult because of the low priority given by many employers to this kind of work. In the polytechnics sector, however, institutions have included questionnaires to employers as part of the self evaluation process.

4.10 Follow-up

A widely acknowledged weakness of CNAVES's evaluation process is the lack of consequences of or follow-up on the reviews. CNAVES makes this a central point in its self evaluation report and argues that this was a failure on the part of the Ministry. In The Netherlands, for example, which was a model for the Portuguese process, the reviews made by the university agency, VSNU, were followed by a site visit by the Inspectorate for Higher Education, which first checked to see whether the university had developed an "Action Plan" in response to the evaluations, and checked back again several years later to ensure that the quality improvement plans were implemented.

⁶ The self-evaluation report (page 31).

Follow-up visits to discuss reviews and to explore what institutional actions had been taken in response to reviews might also have been undertaken by CNAVES itself and would have been consistent with the professed goal of academic self-improvement. However, in fairness, effective follow-up to quality reviews has been an issue in many EU countries and until recently most countries in practical terms, or even formally, delegated responsibility for the implementation of review recommendations to the institutions themselves.

The cyclical basis of the evaluations should in principle provide some sort of feedback on the consequences from the previous evaluations, but this was evidently not the case and there seems to have been a complaint from the public universities that reviews in the second round did not cover or reflect results from the first round.

In summary, the current system for follow-up is not in compliance with European standard 2.6 concerning follow-up.

4.11 Information on labour market and employability

Valid Information on employability and labour market exists in Portugal and is collected by the Ministry for Employment and Professional Training on a regular basis. The data collected is, however, not published or distributed to the higher education institutions or coordinated with the quality assurance processes of CNAVES. The panel finds this to be a serious shortcoming of the current system. The collection and use of data relating to the labour market would strengthen the capacity of institutions to improve their academic study programmes. Just as important is the use of output data in the external quality processes to verify the assessment of the quality of the study programmes.

4.12 Major conclusions on strengths and weaknesses

The ENQA panel has in the preceding pages identified the essential strengths and weaknesses of CNAVES. Many of these, not least the weaknesses, were, very commendably, already identified in the CNAVES self-evaluation and are thus validated by the ENQA review.

Major strengths and considerations for carrying-over

The evaluation also identifies a number of strengths in the quality assurance system that the Portuguese Government should consider carrying-over into a new quality assurance system. These strengths are summarised in the following.

- CNAVES's evaluation process has introduced into Portuguese higher education the concept and process of self-evaluation. In a number of institutions, surveys among students had not been conducted until required by the CNAVES reviews. A number of institutions have developed their own internal quality assurance systems as a result of the CNAVES reviews. The CNAVES reviews further assisted many institutions in becoming more reflective about their practice and the institutions have made their education programmes more transparent to the public and to students. This was particularly true in the private sector, where institutions were generally quite new and had little experience with self-evaluation.

- The ENQA panel therefore believes that an emphasis on institutional self-improvement as well as quality enhancement should also be an important part of any future quality assurance system for Portugal. This consideration is further elaborated in the next chapter concerning recommendations for a future system, where it is suggested that this is realised through a comprehensive quality assurance system covering programme accreditation and institutional academic audit.
- CNAVES's evaluation process (self-evaluations of subject fields, external reviews by teams of experts, and published reports) is consistent with accepted international quality assurance practice and specifically with the European standards. The methodological model should, therefore, in outline continue in a future quality assurance system. However, the future model should ensure the involvement of students and other stakeholders to a greater extent; until now, these have been almost absent in the quality assurance processes. This concern is included in the recommendations in the chapter seven.
- Private institutions indicated that their inclusion in the CNAVES reviews helped improve the recognition and reputation of their sector. To some extent, the division into four evaluation councils has contributed to a more visible representation in the quality assurance processes between the corresponding four sub-sectors.

The major weaknesses identified by the panel include:

- The independence of CNAVES operations in relation to the reviewed institutions was perceived as a key critical issue in most of the ENQA panel's interviews outside the CNAVES constituency. The essential ownership of CNAVES by the higher education institutions and the low level of government attention contributed to the image of the CNAVES reviews being too uncritical towards the higher education institutions, thus bringing into question the value added, in terms of quality assurance, of the many reviews.
- Variability and inconsistency in the focus, conduct and reporting of the external teams was perceived to be a common problem, although there is some evidence that the consistency and reliability of the CNAVES external reviews have improved over the two cycles of implementation. The limitations on training was probably a factor, but the highly decentralized structure of CNAVES and its dependence upon collective meetings as a means of coordination proved to be quite expensive and also likely to have contributed to the inconsistencies among the reviews. This decentralized organization also made it more difficult for CNAVES to develop and utilize a professional staff in quality assurance. A staff with such qualifications is a common characteristic of effective agencies in other EU countries.
- Another frequently noted weakness of the external reviews was the heavy reliance on national Portuguese reviewers. The main problem in this regard is that Portugal is a "small country", and that reviewers and the reviewed frequently knew each other well and this sometimes compromised the independence and objectivity of the external reviews; many Portuguese faculties are in-bred (composed primarily of their own graduates) and, therefore, Portuguese higher education needs the stimulation provided by the introduction of European

standards and practices. Moreover, CNAVES and the four councils do not have mechanisms to verify the assumed quality of the skills and competences of the experts by inviting appraisals of possible experts from other independent sources.

- A fourth crucial deficiency of CNAVES's evaluation process is the lack of consequences, or follow-up on the reviews. The passiveness on the part of the Government is part of the explanation, but CNAVES's lack of activity does also bear part of the responsibility. Follow-up visits to discuss reviews, and to explore what institutional actions have been taken in response to reviews, could also have been undertaken by CNAVES itself, and this would have been consistent with the professed goal of academic self-improvement.
- Finally, CNAVES's evaluation process, publications, and meetings provided less evidence than expected of what is described in other countries as "quality enhancement", i.e., encouraging the identification, communication, and implementation of "best practices" in curricula design, teaching, student learning, and institutional academic quality assurance.

5. Accreditations conducted by professional associations

At a time, when there is no national systematic accreditation system in place, neither run by the state nor by an independent agency, a number of professional associations conduct or plan to conduct professional accreditations. Like the CNAVES reviews the professional accreditations only deal with the programme level. However, the professional accreditations are in no way coordinated with the CNAVES reviews.

The interest of the professional associations in accreditation is primarily due to the recent and projected turndown in student enrolments that has enhanced competition across the higher education sector and created an apparent mismatch between the outputs of the higher education and the needs of the labour market. Combined with the perceived deficiencies in the current national quality assurance system, concerning lack of consequences or follow-up on the CNAVES reviews, these developments have further influenced the interest among the professional associations in the regulation or control of market access for their candidates.

Below, the scope, methodological model, consequences and main strengths and weaknesses of the professional accreditations are outlined, as well as the views of the professional associations on a future national accreditation system.

5.1 Professional associations conducting accreditations

There is a large number of professional associations in Portugal, including: pharmacists, economists, engineers, lawyers, nurses, doctors, veterinary doctors, dentists, architects, biologists and certified accountants. Only three of these are currently pursuing professional accreditation: the associations of engineers (Order of Engineers), architects and pharmacists. The documentation reviewed by the ENQA panel clearly shows that the level and extent of accreditation activities vary significantly among these three associations and that their accreditation procedures are at very different stages of development.

The association of engineers (Order of Engineers) is obviously the more significant player and has certainly the most well developed accreditation procedure. The association was also the first among the professional associations to establish an accreditation procedure in 1994. There is a parallel association for technical engineers called ANET that, until recently, offered accreditation of three-year technical engineer courses offered by the polytechnic institutions. However, ANET's accreditation activities are for the time being suspended. The association of architects established an accreditation system in 1999 similar to that of the Order of Engineers, while the association of pharmacists established their accreditation procedure a few years later in 2001.

No other professional associations have so far established a system of accreditation, and the articles of association of some do not allow them to. However, several associations are in the process of changing their articles in such a way that they will be allowed to pursue accreditation. This applies, for example, to the association of veterinary doctors. The association already has an EU-wide accreditation process in place and has adopted European minimum standards for veterinary surgeons. The

panel has noted that the veterinary association is the only one in Portugal with a clear European focus that will automatically involve a process with EU-wide standards as well as an international external review team.

5.2 Methodological model

The professional accreditations rely on a methodological model that, at a general level, is similar to the one of the existing quality assurance system and the model of most European quality assurance systems: accreditation is cyclical and is supported by a self-evaluation report and a site visit by an external review team.

However, one distinct difference is the non-publication of the final report. While the CNAVES reports are public, the accreditation reports are held confidential and can only be made public with permission from the institution being accredited. In this regard, the professional accreditation in Portugal is not in accordance with the European standards and other European accreditation procedures.

The accreditation process is lengthy and takes on average 13 months.

A professional accreditation has usually three possible results:

- accreditation for a period of six years, when renewal of the accreditation will be necessary;
- conditional accreditation for a period of three years with recommendations for improvements that need to be implemented within the period and confirmed by a review team;
- refusal of accreditation (non-accreditation).

The three forms follow the pattern of most other European accreditation systems and strengthen the credibility of the system. The reason for this is that in a system with only a yes/no option, the accrediting body would often refrain from refusing accreditations because of the serious implications for the institutions concerned. The vast majority of the programmes would thus receive an accreditation, and this would significantly compromise the credibility of the system.

In addition, the inclusion of conditional accreditation adds an improvement dimension to accreditation that is basically more control-oriented than other external quality assurance methods, such as evaluation and audit.

5.3 The consequences of professional accreditations

The professional accreditations are not formally linked to funding or degree awarding due to the voluntary nature of the system. However, the accreditations do have clear consequences.

Refusal of accreditation implies a loss of prestige and of the capacity to enrol students in the study programme, with a lower budget as a consequence.

Awarding of accreditation of a programme has the important result that it is made easier for graduates of the programme to become members of their respective associations. This is of high importance to the graduates, as membership of the association is often a prerequisite for exercising their profession.

The requirements for becoming a member of a professional association vary substantially from association to association. In some cases, holding the appropriate degree is a sufficient condition, while in others admission is first allowed after a training period and/or and examination. The latter situation is where accreditation

comes to mean a great difference for the students, as graduating from an accredited programme in some professions (e.g. engineering) allows the students to skip this training period and/or examination and automatically become a member of the association.

The implication is that students graduating from accredited programmes often have a competitive advantage compared to students from programmes that have either not completed an accreditation process or have received a conditional or refused accreditation. The professional accreditations thus create rather unequal conditions for the students – a fact that especially the student representatives, with whom the ENQA panel met during the site visit, were very concerned about.

5.4 Strengths and weaknesses

The ENQA review panel has identified three particular advantages of professional accreditation in comparison with the CNAVES reviews. The analysis is especially based on the example of the engineers association

First of all, the accreditations have consequences and a high degree of credibility, as demonstrated by the results from the more than 200 accreditations of study programmes that the Engineers' Association has carried out in the period 1994–2005. Of these 33 achieved a negative accreditation.

Secondly, it is an advantage of the system that the level of credibility is closely linked to the consistency between processes. Consistencies in the processes and reports are created through the involvement of staff from the professional association in the site visit and by careful reviewing of the reports by the professional staff of the associations. The engineers association plans to strengthen the consistency element further by handing over the responsibility for drafting the reports to the staff of the association. Report writing is until now usually the responsibility of the external review teams.

Thirdly, the criteria for the professional accreditations are focused on student learning outcomes as well as educational input. This outcome focus is in contrast to the CNAVES reviews that mainly emphasise input indicators like personnel, resources and facilities.

The professional accreditations do have some evident weaknesses as well:

First of all, the professional associations rely heavily on national experts. This was mentioned several times during the site visit as a deficiency of the professional accreditations. However, with increasing international cooperation and the adaptation of international criteria and standards, more international experts are likely to be included in future expert panels. For instance, the engineers association is involved in the EUR-ACE cooperation and has recently revised the standards of the association to ensure compliance with those of EUR-ACE. Also, as mentioned earlier, the association of veterinary doctors has an EU-wide accreditation process already in place that will involve international review teams.

Secondly, the coverage of the accreditations is quite low. The engineers association reported coverage of only 40% after 11 years of accreditation. The Architects' Association has completed 25 accreditations from 1999-2005 and the Pharmacists' Association has conducted seven from 2001-2005.

Thirdly, the transparency of the accreditation processes is limited due to the previously mentioned problem that the reports are not made public. This makes

the accreditations out of step with the development in European quality assurance practices.

5.5 Future

The panel received many comments during the site visit on the obvious lack of coordination of the processes of CNAVES and the professional accreditations. In particular, a number of institutional representatives expressed their frustration with the lack of coordination and pointed to the double impact and overloading of institutions that were responding to the requirements of both processes. Another noted frustration was related to the disturbing fact that the two processes in many cases lead to different conclusions on the quality of individual programmes. Some professional associations shared this frustration and expressed the need for one national mandatory accreditation system. They agreed that the capacity to pursue accreditation should be vested in the new national agency for accreditation, and that the accreditation power of the professional association as a consequence should be transferred to the new agency. The risk of having two systems running in parallel was too evident.

However, the associations also stressed that they should continue to play a role in accreditation and that the valuable experience of many years of accreditation deserves early consideration by the new agency. In the chapter on recommendations for a future Portuguese quality assurance system, specific recommendations for the role of the professional associations in the future system are provided.

6. Conditions for a new Portuguese quality assurance system

6.1 Mandate of the ENQA panel

ENQA has been asked by the Portuguese government to provide recommendations that will lead to the establishment of a national accreditation system and practices which will meet the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (EHEA) and ensure appropriate academic and management structures for implementing adequate quality assurance and accreditation practices.

This initiative from the Portuguese government parallels activities in a growing number of European governments that are applying quality assurance systems for higher education that are based on an accreditation approach. At the same time, it is notable that there are often variations in the interpretation of what the exact resulting demands and implications are in terms of organisation and basic methodological choices.

It is an important recent development that European external quality assurance agencies have, to an increasing extent, accepted the common denominator “quality assurance” as the cover term for methodological specialisations such as evaluation or accreditation. The decisive expression of this development is the consistent use of the term “quality assurance” in the ENQA report to the ministerial meeting in Bergen 2005, rather than combinations such as “quality assurance and accreditation” or “accreditation and evaluation”. The ENQA panel considers the consequence of this development in section 7.1. below on quality assurance terminology.

6.2 The basis for the recommendations of the ENQA panel

In fulfilling its task the ENQA panel has drawn on its members’ considerable experience of international and European best practices within quality assurance, including accreditation. Furthermore, the panel has based its considerations on its high degree of familiarity with the content and intentions of the European standards of quality assurance adopted at the Bologna conference of ministers in Bergen in May 2005, at which three panel members were very involved in the formulation and agreement of the standards.

Accordingly, it is a basic premise for the ENQA panel that the recommended future system must meet the code of practice expressed in the European standards.

Therefore the recommendations of the panel are based on the view that the coming Portuguese accreditation system of higher education should not deviate from the fundamental principles on which quality assurance of the higher education system is now based in most European countries.

The following are basic elements of this practice.

- The process of quality assurance is independent of public authorities as well as education institutions and is, therefore, normally based in an independent quality assurance agency.
- External experts carry out the academic assessment.

- As a main rule, the basis of the assessment will be a self-evaluation report prepared by the programme under review in combination with a site visit.
- The process is completed by the publication of a report.

The ENQA panel has further carefully considered strengths and weaknesses of the existing system as reflected in the first section of this report. The strengths are identical with those good practices and experiences that will benefit the new accreditation agency. The weaknesses point to those procedures and elements of organisation that provide valuable learning experiences, but that should not be carried on into the new system. The analysis and recommendations in this section will therefore also be based on the links to the CNAVES experience as reviewed by this panel.

The ENQA panel made use of its site visit week to discuss with a broad range of stakeholders their views on and priorities for a future quality assurance system for higher education. The panel must make its own analysis and arrive at its own conclusions, but it was struck by the overall consistency of views and expectations expressed. The main points may be summed up in the following statements.

- There is a distinct need for an accreditation system to adequately place Portuguese external quality assurance of higher education in an international or European framework.
- The European standards for quality assurance of higher education should form the basis of the future system.
- The new system must be constructed in a manner that ensures credibility based on the necessary independence of operations from the higher education institutions as well as from government.
- The new system should cover the programme level, but be paralleled by a system of academic audit and accreditation at the institutional level.
- The improvement perspective should be maintained in the new system.
- The processes should, as a rule, involve international experts.
- The new agency must ensure consistency of its processes and therefore be strong in terms of professional administration and staff.
- The new agency must respect the structure representing public/private universities/polytechnics.
- The new agency must cover all study programmes of higher education, and, accordingly, the accreditations carried out by the Portuguese professional associations must cease as independent activities.
- The new agency must be consistent and possess well-defined and operational procedures for follow up on.

7. Key issues and recommendations for a Portuguese quality assurance system

7.1 Quality assurance terminology

In the following sections, the ENQA panel will analyse and discuss a number of key issues that are relevant for the coming establishment of a Portuguese accreditation system, and present its resulting recommendations to the Portuguese government. However, the broader heading of quality assurance is applied by the panel to present its analysis, because this leads to conclusions that point towards the need for a comprehensive Portuguese quality assurance system that includes not only accreditation, but also academic audit. An academic audit is an external review of the internal quality assurance processes and mechanisms that academic institutions employ to assure the academic standards of their study programmes.

The ENQA panel recommends that the name of the new agency reflects the recommendation below that the agency covers accreditation and evaluation/audit. The panel's specific recommendation bears the title "The Quality Assurance Agency" and not "The Accreditation Agency".

The quality assurance name is compatible with the terminology used in the European Bologna process (see the ENQA report adopted at the Bergen meeting of Ministers 2005). At the same time, the name opens up the possibility for further methodological diversification of the agency. Innovation must be possible in order that the new Portuguese agency can adopt other methodological approaches than accreditation, for example audit.

Internationally, accreditation is often defined and interpreted differently. In several national systems accreditation processes are equal to what in Europe is called evaluations, i.e. quality assurance processes that are not based on criteria and do not lead to authoritative decisions on quality levels. The ENQA panel, however, finds that accreditation differs from evaluations primarily in terms of its point of departure and outcome.

The ENQA panel recommends, therefore, that the new agency adopts the following definition of accreditation: The characteristic of accreditation is that the process is based on established external criteria and that the result of the process is a decision as to whether these criteria have in fact been met by the institution or programme under accreditation.

Whether labelled accreditation or something different, the important point is that the method used is based on agreed and published criteria, and makes a formal statement about whether or not the evaluated object meets these criteria.

Further accreditation is used with two different meanings: signifying either a stamp of approval/disapproval or describing a method and process of quality assurance. To indicate that an institution or programme has been awarded the stamp of approval, the

term "accredited" is used, and, likewise, the term "non-accredited" is applied in the event that an institution or programme fails to achieve such a stamp.

A distinction is made between pre-accreditation (ex-ante) and accreditation (ex-post). Pre-accreditation is a preliminary review of the basis on which a programme is to be established and will result in either a yes or no to launch the programme. Such reviews may be based on desk research reviewing study regulations, the availability of qualified teachers, admission requirements and facilities. Pre-accreditation usually replaces the ministerial approval of new study programmes.

The ENQA panel recommends further that academic audit be defined by the new agency as a method for evaluating the strengths and weaknesses of the quality assurance frameworks and mechanisms adopted by a higher education institution for its own use in order to continuously monitor and improve its activities and results.

The fundamental issue in academic auditing is how an institution knows that the standards and objectives it has set for itself are being met. It should also be stressed that academic audit has accordingly a very strong enhancement dimension.

7.2 National versus international accreditation

The purpose of accreditation in the new quality assurance system is partly the obvious one of assuring that quality at higher education institutions meets the requirement of the government and stakeholders, and provides institutions with benchmarks on which to base their further development. But accreditation must also make the quality of Portuguese higher education programmes transparent and comparable in an international context. Only in this way, can Portuguese higher education secure its place in the global context of higher education and, thereby, the necessary international mobility for staff and students.

Higher education has namely in a global context begun to take on some of the characteristics of a market place, and the new accreditation system must be designed to support the efforts to attract the best staff and students from abroad, and to provide access for Portuguese staff and students to academically attractive institutions abroad.

In this context, considerations of the new Portuguese system must also take into account that external quality assurance of higher education is increasingly a global affair. Accreditations across borders are offered by agencies such as the US regional accreditation commissions and by private professional organisations such as the US based Association to Advance Collegiate Schools of Business (AACSB) or the Accreditation Board for Engineering and Technology (ABET). In Europe, the European University Association (EUA) reviews universities, and professional organisations such as the European Quality Improvement System (EQUIS) review business schools, and the veterinary professional organisations work together to set up shared procedures and criteria for accreditation.

In Portugal the EUA has been active in reviewing several universities, and among the professional associations, the Order of Veterinary Doctors is deeply involved in European cooperation on shared standards for accreditation of veterinary programmes.

The point could therefore be made that Portuguese higher education institutions should be permitted to shop globally – and European – for accreditations performed by international accreditation operators, whether agencies of professional organisations

or not. However, the ENQA panel considers it a very important point that the Portuguese government launches a new and strong quality assurance system that ensures that accreditation results over a broad range of fields are credible, consistent and comparable; thus providing essential information for young Portuguese searching for their preferred study place and for employers searching for graduates with the best educational background.

If that is the goal, the new system should be totally informative and its results be comparative. Therefore, the system must firstly be based on comprehensiveness and the mandatory inclusion of all study programmes within the coming accreditation cycles. It is essential that all study programmes within a field are held to measure against the same minimum criteria for quality. A search for the right study place or the identification of the relevant graduate would be seriously hampered if three study programmes were accredited by the new national agency and one programme accredited by some international provider of accreditations with its own set of criteria.

Secondly, the need for international transparency should be served by the anchoring of the new Portuguese system to the European Standards. Furthermore, the use of international experts, the implementation and reporting in English will ensure an international dimension in quality assurance processes.

At the same time, it should be recognized that Portuguese institutions and programmes may perceive an added value in submitting themselves to accreditation by international operators. It is an evident implication of institutional autonomy that the institutions should be permitted to do so. But it should also be evident that in such a case institutions must fund the accreditations out of their own budgets and that the programmes in question would still have to undergo the mandatory, cyclical accreditations by the new Portuguese agency. Furthermore, the institutions should be restricted to contract with quality assurance agencies that will be recognised in the so-called European register. In 2005, the Bologna ministers invited ENQA and its partners to submit to the ministers the plan for a register of quality assurance agencies. The register is planned to identify and list those agencies that in terms of organisation, procedures and methods are fully compliant with the European Standards.

In other words there is an argument that the future quality assurance system leaves room for other national and international operators, but it is even more important that the system ensures a high degree of consistency and comparability in processes and results. Therefore care must be taken to

- restrict the use of other operators to those that are listed in the coming European register
- apply the same minimum criteria for quality
- give the board of the new national agency a mandate to validate and endorse the reports that are produced as a results of processes implemented by other national or international operators
- give the board the mandate to refuse reports that do not comply with the European standards or the general quality criteria set by the national agency
- give the board the mandate to make all accreditation decisions irrespective of operator responsible for the process

The ENQA panel recommends that the new agency covers all Portuguese study programmes of higher education and, accordingly, that the accreditations carried out by the national professional associations do not need to continue.

The ENQA panel recommends that higher education institutions and programmes have the formal right to let them be accredited by international accreditors, but on a self-funding basis and without the option of excusing themselves from the mandatory accreditations of the new Portuguese agency.

The ENQA panel recommends that the board of the quality assurance agency has the mandate to accept or refuse reports from other national or European operators and to make all accreditation decisions irrespective of operator responsible for the process

7.3 Methods and levels of a Portuguese quality assurance system

Two issues are covered in this section, namely the number and types of methods that a Portuguese national quality assurance system should cover and how these are to be applied with regard to institutional and programme levels.

Concerning methods, there is great variation in the scope and scale of quality assurance systems in Europe, as well as internationally. The Netherlands and the USA have "pure" accreditation systems, while Denmark, Austria and to some degree Germany employ a number of methods ranging from accreditation to academic auditing and evaluation. Concerning levels, the European trend is moving towards a distinction between accreditation at the programme level and academic audit, and evaluation at the institution level.

The decision of the Portuguese government to set up a quality assurance agency should not preclude a combination of accreditation with, say, academic auditing at institution level. It is the opinion of the panel that a mature quality assurance system should operate at both programme and institution levels. A combination of different quality assurance methods will make it possible for the Portuguese government to include in its design of quality assurance both the element of control (accreditation) and the element of improvement (academic audits).

The above argument is based on the emerging agreement among many in the field of quality assurance that academic standards will most likely be best assured when increasingly autonomous institutions have in place strong and effective mechanisms for improving the quality of all their academic study programmes. Therefore an important evaluation function of the proposed Portuguese quality assurance system would be to help develop the capacity of higher education institutions to assure academic standards and to improve teaching and student learning.

A number of quality assurance agencies in EU countries now conduct both program accreditations as well as academic audits. Academic audit processes are particularly well developed in Denmark, Finland, Norway, Sweden, and the UK. Because academic audits examine an institution's own processes for assuring the quality of its academic programmes, their focus can be a well functioning compliment to programme accreditations. The central attraction for the institutions is that they receive a comprehensive analysis of the level of their own internal quality assurance, and one on which they may base their future quality work. It follows that higher education institutions have, as a rule from the beginning, adopted a positive attitude

towards academic audits, in contrast to the prevailing critical attitude towards evaluations in the 1990s.

The ENQA panel recommends that accreditation at programme level be combined with academic audit at the level of higher education institutions.

The ENQA panel has considered whether this recommendation should argue for two parallel systems: an accreditation system and an academic audit system. The panel's conclusion is that one comprehensive agency is preferable, because such a quality assurance agency covering accreditation and academic audit would have a stronger financial and staff base. At the same time the agency and the institutions would all benefit from the synergy between accreditation and academic audit.

The ENQA panel recommends

- *that the new quality assurance agency decides on a first cycle of accreditations at the programme level, beginning in the second half of 2007;*
- *that this first cycle covers at least the BA level of study programmes in all public and private university and polytechnic study programmes;*
- *that the new quality assurance agency announces a future cycle of academic audits and then carefully designs an academic audit process appropriate to the needs of Portuguese higher education to be introduced following the completion of the first cycle of programme accreditations;*

This schedule would allow the institutions time to adapt to the implications of the new system of programme accreditation as well as provide further incentive for the development of their own internal quality assurance processes. The academic audits themselves could then focus on sharing best practice, providing an external assessment of existing processes and recommendations for improvement as a means of advancing the development of institutional quality assurance processes.

In order to regulate the number and quality of higher education institutions the agency should consider also introducing institutional accreditation. Institutional accreditation is relevant in three connections.

Firstly, in the case where a new institution is established and applies for approval to offer either undergraduate or post graduate study programmes. It can be either a private or public institution.

Secondly, in the case where an institution applies for an elevated institutional status. In Portugal as in a number of other European countries the distinction between the university sector and the polytechnics is being eroded, and an increasing number of polytechnics are introducing research activities and postgraduate study programmes. Therefore, it is expected that a number of polytechnic institutions will aim to elevate their institutional status to become universities

Thirdly, in the case where the Ministry suspects that the programmes offered by a certain institution suffer from poor quality. One type of evidence could be that institution's repeated failures in obtaining programme accreditation.

In all three cases the institution should undergo an institutional accreditation that determines whether the institution in question has appropriate and credible structures and mechanisms in place to ensure the quality of its activities. The result of an

institutional accreditation process should then be a yes/no decision. The process of institutional accreditation would then replace the existing ministerial approval of institutions. The main argument of the review panel is that institutional accreditations should not be organised on a systematic, cyclical basis but should take place on an ad hoc basis.

In the first two cases mentioned above the initiative for accreditation should be that of the higher education institutions in question. Only in the third case would an initiative by the Ministry be the normal procedure.

The ENQA panel recommends that the new agency consider introducing institutional accreditation in order to steer and regulate the number and quality of the higher education institutions.

7.4. One strong national agency

A widely acknowledged weakness with the existing quality assurance system is the complexity and inconsistency in the system.

The panel's recommendation for a future quality assurance system is a single one-tier system. As argued in section 7.3, this agency should be responsible for accreditation of study programmes and institutional audit of all higher education institutions. The agency should have the following characteristics:

The authority to make accreditation decisions

The accreditation decision should be entirely based upon an assessment of the academic quality of the study programmes resulting from the accreditation process. The decision to launch new study programmes according to criteria for national relevance should be vested in the Ministry. The dual decision procedure will be further elaborated in the next section.

Vesting the authority to decide on accreditation in the quality assurance agency contributes to creating a high level of transparency as far as criteria and the procedure are concerned. The drawback is that the same body is responsible for both the process and the decision that follows from the process. To make an allowance for this, it is necessary to establish a well-functioning appeals system for the benefit of the accredited study programmes. The issue of an appeal system is dealt with in 7.22.

In order to reduce the risk that a decision to launch an accreditation or set up an accreditation cycle is mingled with political interests or motives, however, it may be an obvious solution to vest the right of the initiative in the board of the quality assurance agency.

The board

The agency should be truly independent of the government, higher education institutions and other parties, as stressed in the European standards. An independent board with members appointed in their personal capacity should guarantee the independence of the agency.

The board should be small and comprise approximately ten members. The board should meet frequently (once a month) and should have the authority to initiate programme accreditations and institutional audits on a cyclical basis, approve the

external experts and the composition of the panels, and, in accreditation cases, decide whether a programme meets the specific quality criteria or not.

The membership of the board should reflect established professionalism in overseeing quality assurance processes and understanding the process of accreditation decisions. However, the panel wishes to point to the possibility that the board establishes itself with subcommittees representing sector specific knowledge. Such a construction could contribute towards enhancing credibility.

The integrity and independence of board members must rest on the fact that they are all appointed in their personal capacity. This prerequisite should prevent a situation where board members could bring their institutional interests into board decisions.

There must be continuity in the work of the board, but membership of the board attaining semi-permanent status should be avoided. Members should therefore be appointed for a three-year period, with the possibility of this being prolonged once. The members should be appointed on staggered terms in order to avoid the whole board changing over the same year. This leads to the key issue of the procedure for appointing board members.

It is a central lesson from CNAVES that the composition and affiliation of an agency's governing body is essential for the way in which institutions, stakeholders and government perceive the agency's degree of independence. The ENQA panel has considered various models based on their international experiences. The conclusion is that the government should appoint as chairperson a respected member of Portuguese society, but without any present employment, either in a higher education institution or in government.

The government further should appoint ordinary board members based on the nominations from the constituent member groups in the advisory council recommended below.

The government may at its discretion also appoint two or three non-Portuguese members with international experience in quality assurance of higher education. Nominations for these members could naturally be invited from the board of ENQA.

An advisory council

To ensure a wider involvement of stakeholders in, the board should be supplemented by an advisory council with representatives from relevant stakeholders, including higher education institutions, employer organisations, professional associations, student unions and perhaps international experts. The advisory council should not have any formal decision making authority but should provide advice to the board on issues related to the quality assurance of higher education.

The ENQA panel recommends establishing an agency with clear responsibilities for quality assurance and accreditation. An independent professional board appointed by government with decision-making authority should guarantee the independence of the organization. In addition, an advisory council should be established with a broader representation of relevant stakeholders.

7.5 Independence of the agency

The independence of quality assurance is a key element of the European standards. The independence of quality assurance agencies concerns independence from ministries

as well as from higher education institutions. There is no doubt that the most often mentioned critique of the existing quality assurance system is the lack of independence in relation to higher education institutions.

The European standards highlight the issue of operational independence as the most important aspect of independence. This implies that definition and operation of procedures and methods, nomination and appointment of external experts, and formulation of conclusions and recommendations in the reports are undertaken autonomously and independently from ministries, education institutions and other stakeholders.

The operational independence should be ensured through official documents, e.g. a legislative act, which is the case in most European countries. The legal bases of the quality agencies in Europe guarantee to different extents the operational independence of the agencies.

It is important that the mandate of the new quality assurance agency is clearly described in the legal framework. An unclear mandate can open a window for ministries, institutions, and other kinds of organs with political interests to influence operations. On the other hand, the legislation must not be too detailed, for instance in its specification of the criteria that form the basis for the accreditations. The formulation of the assessment criteria is a process that should be vested in the quality assurance agency in order to ensure that the criteria are continuously adjusted and revised in accordance with actual quality developments that take place at the higher education institutions.

The point here is that, on the one hand, the legal framework should ensure that the mandate of a new quality assurance agency is clearly defined to protect the agency from political pressure and opportunistic behaviour. At the same time, the legal framework should be formulated in a way that allows a certain degree of flexibility in the management and operation of the accreditation system, e.g. determination of criteria, adjustment in procedures, etc. The flexibility is needed to ensure that the accreditations do not promote conservatism and rigidity in the quality assurance of higher education.

The ENQA panel recommends that the operational independence of a new quality assurance organisation in Portugal be ensured through a legal framework that clearly describes the mandate and tasks of the quality assurance agency, while providing the necessary flexibility for the operational level to make necessary adjustments to operational procedures.

In most European agencies an independent board or council is perceived as the major guarantee of independence. Section 7.4 above contains reflections and recommendations on the role of an independent board for the new agency.

7.6 Data and information system

A common concern is the inadequacy of information relevant to the improvement of academic programmes, particularly information relating to programme graduates, the labour market and employees. In a mixed and competitive system of higher education, such as in Portugal, the provision of valid information on academic programmes can be a critical component of an effective quality assurance framework.

The European standards have as a key element the need for higher education institutions to possess elaborate and operational information systems. A number of countries are also attempting to define the essential academic programme information that should be publicly available to ensure the effective functioning of their quality assurance systems. This issue is currently being debated in Australia, the UK, and the US. While a number of these initiatives are motivated by a desire to better inform students on choice of institution or study programme, the more significant contribution of these data may be to strengthen the capacity of institutions to improve academic programmes. The collection and publication of these data reveal quality variations among academic programmes, thereby helping institutions discover best educational practices, as well as identifying programmes in need of improvement. Encouraging such a “culture of evidence” is often an essential first step to motivating effective collective actions for self-improvement within academic communities.

The ENQA panel recommends that an early project of the new agency be to ensure that information for each study programme needs to be publicly available and to make recommendations to the Ministry regarding the best means of providing these data.

There are various approaches to providing the necessary data. Academic institutions may be required to produce and publish the data themselves, and accreditation reviews may be required to verify the accuracy of the relevant data. A government agency may collect the necessary data and publish the reports. Alternatively, third parties may provide the necessary data under contract with individual institutions or with the government.

7.7 Cross-sector reviews

The European standards emphasise that quality assurance agencies should produce summary reports describing and analysing the general findings of their reviews, assessments and evaluations. The rationale for this recommendation is that quality assurance agencies collect a wealth of information about individual programmes and institutions that provides material for structured analyses of the entire higher education system. Such analyses about developments, trends, emerging good practice and areas of persistent difficulties can become useful tools for policy development and quality enhancement.

The ENQA panel recommends that the new agency establish a procedure for producing summary reports every second or third year.

7.8 Professionalism and consistency in the work of the quality assurance agency

The credibility of external quality assurance processes depends on a high professional level in the agency responsible. The level of credibility is also closely linked to the consistency between processes. Therefore, the European standards include a recommendation that quality assurance agencies should have adequate human and financial resources to match the tasks they are required to perform. This is not the case in the existing quality assurance system where the decentralized organization

made it very difficult for CNAVES to develop and utilize a professional staff in quality assurance, as is the common characteristic of effective agencies in other EU countries.

In other words, there must be in the new agency a staff, which both in terms of number, qualifications and resources is capable of ensuring methodical professionalism and consistency of the individual accreditation processes and from one accreditation to the next. This concern is especially important in relation to programme accreditations, which may otherwise suffer from the fact that different expert panels are going to view various elements differently and will make their own independent interpretation of the criteria.

The professional staff of the agency should ensure therefore the consistency in the operational processes and reporting in relation to accreditations and audits. However, considering that in the current model of CNAVES and the four evaluation councils the processes and reporting are the responsibility of the external experts this recommendation absolutely implies a role reversal in the new system for the external experts in relation to the staff of the agency.

The external experts should have the responsibility for the academic assessments of the accreditations and audits and the resulting conclusions and recommendations. But the responsibility for the applied methodology, the quality assurance process and the drafting of the report should be vested with the professional staff of the agency. This division of labour would reduce the risk of inconsistency in the interpretation of the criteria and in the reporting from one accreditation or audit to the next.

A similar division of responsibilities between review panels and professional staff is in place in a large number of established national systems. This has not been the source of conflicts and on the contrary it is the Danish experience that recruitment of panel members is substantially eased by the argument that experts are not expected to spend weekends or holidays drafting reports.

In Denmark the division of responsibilities is included in the formal contract signed by the individual panel members and EVA's executive director.

It should be added that a strong professional staff will be able to secure the necessary methodological innovation of the agency; it will be able to organise proper processes; and it will be in a position to form the necessary links and networks with other European or international quality assurance agencies.

One of the first tasks of the board of the new agency must be to consider and define the relevant profiles of staff members. In this task it is important that focus is not exclusively on recruiting staff members with high academic credentials and seniority. Being a good professional in the management of quality assurance depends on additional qualifications than that of a PhD in an academic field. Professional staff members must have strong analytical resources and the capacity to work in teams. Strong qualifications in English will be necessary, partly because review processes will involve English speaking experts, and reports must be drafted in English, and partly because skill in written and spoken English will be the entry ticket to participation in European and international cooperation.

Additionally, it is important to secure staff members with high qualifications in applied methodology, qualitative as well as quantitative. Special attention should also be given to establishing the necessary expertise in communication and information

services, so that the new agency experiences greater success than CNAVES in making processes and results transparent and publicly available to Portuguese society.

The panel does not wish to be unduly explicit on the qualifications of the executive head of the new agency. The priority must be to recruit an executive whose profile is one of the highest personal integrity and who will be respected in the higher education system. Political acumen and sensitivity is also necessary, but must be combined with the knowledge and flair with which to build up a strong organisation with committed staff and enjoying the trust of the higher education community.

In the establishment phase the new quality assurance agency would benefit from the use of external consultants with relevant international experience to advice on organisational and methodological matters.

The ENQA panel recommends establishing an agency with a strong and highly qualified staff and with a clear division of responsibilities between external expert panels and the staff

The ENQA panel recommends further that an executive director be appointed with a strong personal profile and relevant experiences in organisation building and quality assurance.

The ENQA panel recommends further that the quality assurance agency be established on the basis of a budget, which provides for a professional staff consisting of not less than twenty-five qualified members.

The ENQA panel recommends that in the establishment phase the quality assurance agency cooperates with external consultants with international experience to advice on organisational and methodological matters.

7.9 Use and role of experts

Considering the prevailing criticism of the external experts appointed in the existing quality assurance system, it is of course important that the new quality assurance agency sets up procedures for the recruitment of experts that secure academic expertise at a high level, coupled with personal integrity and independence of institutional or governmental interests. Integrity and independence are the keys to the credibility for which the new agency must be recognised by the higher education institutions and other stakeholders. This point is also reflected in the European standards and leads to a recommendation, which should of course be seen in the context of the arguments and recommendation in section 7.10 on international experts.

The ENQA panel recommends that the quality assurance agency establishes and enforces a no-conflict-of-interest mechanism in the appointment and work of its external experts.

The panel observes that in the existing quality assurance system there is a marked tendency to equate expertise and integrity with the appointment of elderly, mostly male, full professors from the public universities. The panel does on its part consider it very important that the national Portuguese experts appointed represent a fair proportion of younger and/or female qualified academics in order that experiences of quality assurance gained by experts create a positive spread effect in higher education

institutions. Neither does the panel support the argument it met during several interviews that integrity and independence of interests necessarily increase with age.

The ENQA panel recommends that experts are appointed through a process that ensures a balanced age and gender profile and an appropriate insight into quality assurance.

In the existing quality assurance system inconsistency in the focus and conduct of the external expert teams is perceived to be a common problem. CNAVES points in its self-evaluation to the fact there was never an adequate level of training of experts. The reasons given for this are lack of funding and organisation, combined with a low level of motivation among the experts to attend the training that was in fact offered.

The ENQA panel recommends that the new quality assurance agency receives the necessary funding to organise systematic training of experts for the review panels.

At the same time, the panel recognises that if the agency staff is sufficiently strong in terms of process-administration and methodology, the training of experts could focus primarily on preparing them to conduct themselves professionally and efficiently during site-visits.

7.10 Use of international experts

It is an element of the European standards that European external quality assurance systems should be encouraged to open their processes as much as possible to international expertise. In this perspective a definite weakness of the external reviews in the existing quality assurance system is the heavy reliance on reviewers from Portugal, even though CNAVES asserts in its self-evaluation report that a measurable percentage of international evaluators are utilized in the reviews, and that this increased over time. CNAVES also notes that it did not have the authority to require of the institutions that reviews were conducted in English, which would be necessary in the case of international teams.

Private institutions were particularly outspoken on the need for fair balance in panels and for international reviewers. They noted that almost all of their external reviewers came from the Portuguese public higher education institutions (i.e. their competition) and often appeared biased against private study programmes.

Finally, while there was strong support for international reviewers, there was also support for CNAVES' viewpoint, namely that members of external review teams be knowledgeable about Portuguese culture and the national system of higher education. The panel notes that the international teams successfully used in the research evaluations were also sensitive to this issue. That is, these teams were chaired by Portuguese researchers, although the latter were not permitted to vote on the team's evaluations.

The panel recommends that members of external review panels typically number four-five members. Of these, at least two members must come from countries and or higher education institutions outside Portugal. At least one member must be from Portugal, but not represent a Portuguese higher education institution.

In many European quality assurance systems the inclusion in review panels of international experts is now being introduced. The major obstacle is in most cases the added resources involved in basing review processes and their documentation on a non-national language, because international experts do not speak the local language. One solution to this problem could be to appoint, if possible, Portuguese academic expatriates as experts, but in that case the recommended procedure should be that such experts have not been working in Portuguese higher education institutions for at least five years.

In any case, the use of international experts will add to the costs and burden of the quality assurance system, but it was evident from the interviews with representatives from higher education institutions on the site visit that the burden, if not necessarily the cost of this change, would be accepted as *quid pro quo* for increased credibility and better experts.

The ENQA panel recommends that the funding of the new quality assurance agency is at a level which makes it feasible to conduct reviews in English or another international language.

7.11 Inclusion of students in the quality assurance process

The extent of student participation in the quality assurance processes in higher education institutions presents a differentiated picture across Europe. Participation may take place in three contexts: Firstly, as part of the process at the institution or programme under review; secondly as members of review panels; and thirdly, through representation on boards/councils.

Students will in most cases be represented in the self-evaluation process. Nevertheless, they do not seem to influence these processes in any significant manner. The impact of the students will therefore in most cases be linked to interviews with student groups during site visits. This state of affairs has also been characteristic in the existing quality assurance system where the role of students in the quality assurance processes has been unduly reduced. As is the case in most European countries at present, students have not been invited to join review panels.

The European students' organisation ESIB had an important role in the work leading to the ENQA report for the European ministers in Bergen. All involved parties accepted the position of ESIB and that the European standards should stress the importance of student participation as well as possible panel members in quality assurance processes.

The ENQA panel recommends, therefore, that the new quality assurance agency firstly ensures that it is an unconditional element in the self evaluation processes and the site visits that student representatives have a roll that can lead to actual contribution to the process. Secondly, the new agency should set up procedures that ensure that appropriateness of including students is considered when external review panels are composed.

It must be recognised that the process of identifying student members of review panels is not necessarily an easy one. Care must be exercised that student members introduce the specific interests and concerns of students placed within the study programme into the work of the panels. They should be accepted therefore as panel members in their

personal capacity rather than as spokesmen for the general political platforms of the national student organisations.

Student participation should also be considered in relation to the advisory council of the new agency. In case of participation, student members should, in contrast to the argument above concerning panels, be able to articulate in the advisory council more general student related quality assurance policies. There is a significant number of student organisations, but these could be invited to nominate members to the advisory council to the board.

The ENQA panel recommends that the Portuguese government appoint representatives of student organisations to the advisory council.

7.12 Stakeholder Involvement

A deficiency in CNAVES's evaluation process is the lack of active participation of relevant stakeholders in quality assurance processes. In other European countries, employer representatives in particular are invited to join expert panels to bring in an external perspective that supplements the perspectives of experts from the higher education system. Another applied approach used especially in the Danish quality assurance system is the inclusion of user surveys as an important source of documentation to complement and verify the self-evaluation documentation of the institutions. The user surveys will typically cover employers or graduates.

The ENQA panel recommends that the view of relevant stakeholders, e.g. employers and graduates, be taken into account in external quality assurance processes.

The following approaches could support this recommendation:

- Accreditation review panels could include at least one member with a qualification as employer of graduates from the programme
- Higher education institutions could be encouraged to establish within the major programme fields permanent panels of employers and/or recent graduates. Partly these panels could serve as running feedback to institutions on the quality of the programmes in question. Partly the panels could contribute directly with their observations to external quality assurance processes.
- In connection with accreditation processes higher education institutions could be encouraged to initiate quantitative surveys of employers' or recent graduates' impressions of quality of the programmes under accreditation. This approach would be especially relevant in the cases where programmes face substantial employment problems for their graduates.

7.13 International cooperation and networking

A priority must be to ensure the international significance and relevance of the Portuguese quality assurance system. Here, active participation in European and international cooperation is a very important tool. The highest priority should go to achieving membership of the ENQA where there is a continuous sharing of knowledge of best practices. In several European countries, a process is now well under way towards translating the European standards into the respective national quality assurance systems and processes. A shared methodological platform

and shared standards are very important elements towards assuring international transparency, comparability and compatibility between individual national quality assurance processes.

Another potentially relevant framework for cooperation could be the somewhat more exclusive European Consortium for Accreditation (ECA) where seven European national agencies work together towards harmonisation of their accreditation processes with the aim of establishing mutual recognition of accreditation results.

At the global level, the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) is the obvious platform for introducing the new Portuguese system internationally.

However, active international and European networking does put a strain on a quality assurance agency's resources, human as well as financial. It is, at the same time, important that international activities are not exclusively the domain of the top management of the agency, but also include ordinary staff members, so that these may have the opportunity to improve their own quality assurance professionalism through meetings and workshops with international colleagues. Another relevant instrument is staff exchange or trainee periods at other agencies. The Danish agency has had staff exchanges twice with the Swedish agency and has over the years received trainees from several European agencies.

The ENQA panel recommends that the new quality assurance agency be given the directive and the means to engage actively at all levels of the agency in international and European cooperation and networking.

7.14 Internal accountability procedures and compliance with the European standards

A core element in the European standards is the requirement that external quality assurance agencies must have procedures in place for their own accountability. The background for this standard was an ENQA process from several years ago that was focused on the idea that agencies must be prepared to "take their own medicine" to quote the title of an ENQA workshop on this subject in 2004 in Barcelona. The ENQA membership standards specify accordingly what elements must be included in the internal quality assurance of agencies.

According to the European standard on this issue, agencies are expected to have a published policy for the quality assurance of the agency itself, and made available on its website. This documentation must, along with other documentation, demonstrate that the agency's processes and results reflect its mission and goals for quality assurance; that the agency has internal quality assurance procedures in place which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

Finally and most importantly, the agency is required to undergo a mandatory cyclical external review of its activities at least once every five years. The results of the cyclical external reviews lead for one thing to the decision of ENQA as to whether the agency is - or continues to be - fit for membership. Just as important, however, the results should

form the basis for the decision as to whether the agency can be listed in the coming European Register as an agency complying with the European standards.

The European Register was introduced in the ENQA report to Bergen. The task of the register is to invite external quality assurance agencies operating in Europe to be listed according to their compliance with the European standards. In the communiqué from that meeting Ministers say that the register must be formalised and established through the work of ENQA in cooperation with the European organisations of universities (EUA), polytechnics (EURASHE) and students (ESIB). The discussions among these four organisations are ongoing and will end with a recommendation to the Bologna ministerial meeting in May 2007. The exact format and rules of the European register are therefore not yet determined.

The standard on internal accountability is perhaps in the full scope of its requirements that standard which will demand the greatest efforts for many established European agencies to comply with. The panel realises this fully and understands that the new quality assurance agency needs proper time to develop its own accountability. If the new agency is established by the beginning of 2007, the first mandatory external review must take place by 2012 at the latest.

It is the view of the panel that a full five year period is a rather long period to wait for a new agency before it achieves learning feedback and corrections from an external review.

The ENQA panel recommends that a mid-term review of the new agency takes place by the end of 2009.

This review can identify the extent to which the agency at that time complies with the European standards and provide advice and feedback on how to achieve full compliance prior to the end of 2012.

The ENQA panel recommends that the new agency gives a high priority to a process leading towards full compliance with all the European standards and thus secures its placement in the coming European register of external quality assurance agencies at the very latest by the end of 2012.

7.15 Pre-accreditation, accreditation and relevance

Recent years' explosive growth in the number of new study programmes in Portugal, caused particularly by the extended autonomy of the public universities and their ability to propose and subsequently launch new study programmes, calls for a more effective national steering and the coordination of the provision of new study programmes in Portugal. Pre-accreditation could be an effective instrument to ensure that the approval of new study programmes is based on a proper quality assessment. The process of pre-accreditation would in the case of private institutions replace the current Portuguese system of ministerial approval of new study programmes.

The process of pre-accreditation should be placed in the same agency that is responsible for the accreditation process of study programmes (ex-post) to create a high degree of transparency and consistency in the preliminary screening of the quality and in the subsequent assessment of the quality of existing study programmes.

Accreditation (first cycle) is carried out three to four years after the initial approval to ensure that existing study programmes continue to live up to declared requirements and criteria.

However, the issue of national relevance, e.g. employment possibilities, student recruitment patterns, duplication of study programmes among institutions, is a process that should be vested in the Ministry and separated from the academic assessment. Providing a positive pre-accreditation (the board of) the quality assurance agency can recommend the approval of a new programme to the Ministry which can subsequently conduct a screening of the programme according to a set of pre-defined criteria for relevance.

The ENQA panel recommends:

- *introducing a two-step accreditation process of pre-accreditation and ex-post accreditation in order to create a high degree of transparency and consistency in the two processes;*
- *that the final decision for provision of new study programmes be vested within the Ministry based on criteria for relevance and national concern.*

7.16 Financing of the new quality assurance agency

It follows from several of the recommendations for the new agency that this must be financed at a level that, among other issues, ensure adequate professional staff, appointment and training of (international) experts and active participation in global and European cooperation. Appendix VII includes a budget for the estimated running costs of the agency, and the establishing costs.

There are various approaches for the financing of the recommended quality assurance agency. Financing could in principle be a government responsibility. A hundred percent government-funded model is applied in the Nordic Countries and in a number of European countries that have a primary focus on programme accreditation.

Another approach is a co-financing model where part of the costs of running operations should be split between government and higher education institutions.

The consideration of co-financing could be based on two principles. One principle could be a fixed ratio between the contribution of the quality assurance agency and the higher education institutions. If this principle is applied the higher education institutions could be asked to contribute a maximum of fifty percent of the full costs of the process. This contribution from the higher education institutions should cover the direct costs for running an accreditation process including salary and other costs that are directly linked to the operation processes. The contribution from the higher education institutions should thus not cover the general costs of the agency. If this approach to co-financing is followed the fifty percent contribution could be gradually introduced with a lower level in the beginning, for instance 30 percent, rising to 50 percent in the next cycle.

Another principle for co-financing could be a variable ratio between the contribution of the quality assurance agency and the higher education institutions. The primary parameter could then be size of the institution in terms of the total budget and student enrolments of the programmes offered. This principle could be realised in two ways: One model is an overall fee that the institutions pay in order to be part of the

accreditation system. Another model is a fee payment that is linked to every single accreditation.

The ENQA panel recommends this second principle for co-financing is followed and that the first model is applied in order to minimise the administration load for the quality assurance agency. The degree of variation according to the size-parameter between the highest and lowest possible contribution from the higher education institutions could then be settled between a 25 and 50 percent contribution.

Accreditation of new programmes could be based on a full fee from the institutions. It is the assumption of the panel that a model of institutional self-financing will regulate the number of new programmes submitted for approval via a process of pre-accreditation and thus avoid a continuation of the recent years' explosive growth in the number of new study programmes

The ENQA panel recommends that accreditation of new programmes is based on a full fee from the institutions.

7.17 The focus of the accreditation criteria

The criteria for programme accreditation should be formulated at two levels. One level concerning generic criteria and one level that focuses on area specific criteria. The area specific standards should, where relevant, take into account criteria that are applied internationally, e.g. those applied by the Order of Veterinary Doctors.

The generic criteria should function as minimum requirements that apply to all types of study programmes and relate to the two cycles of bachelor and master. Thus the generic criteria should be formulated within the framework of national legal requirements and the Bologna process that specifies the outcome requirements for bachelor and master levels respectively.

The reference framework for the generic criteria should be the European framework for qualifications. The framework has been developed by a Bologna working group on a qualifications framework and comprises an overarching framework with a high level of generality. The framework includes cycle descriptions in the form of generic qualification descriptions that should be used as a common framework across Europe. The so-called Dublin-descriptors developed by the Joint Quality Initiative have formed the background for the cycle descriptors for the framework. They offer generic statements of typical expectations of achievements and abilities associated with awards that represent the end of each Bologna cycle.

The area specific criteria on the other hand should focus on the characteristics of specific study programmes within a certain study field, e.g. engineering, economy, etc. The criteria should be comprehensive, covering input, process and learning outcomes, and comply with the European standards. When relevant, the criteria should take into account criteria applied internationally by professional associations in the respective fields, e.g. engineering, economy, veterinary doctors, etc.

Due to the different requirements for universities and polytechnics, separate criteria for each type of institutional programmes should be formulated. Appendix VIII includes a proposal for such differentiated criteria.

The ENQA panel recommends:

- that programme accreditations be based on generic as well as area specific criteria in order to provide a comprehensive picture of the quality of the study programmes;
- that differentiated criteria are formulated to reflect the characteristics of study programmes offered at universities and polytechnics, respectively;
- the application of the European Qualification Framework in the definition of generic cycle-based criteria;
- that the area specific criteria cover input, processes and learning outcome that comply with the European standards, and when relevant take into account criteria applied internationally by professional associations in the respective fields.

7.18 The process for defining the accreditation criteria

Another key question is who should be responsible for defining the accreditation criteria? Should it be the Ministry, the quality assurance agency, the professional associations or the education institutions – or should they be formulated through interaction or actual cooperation between the parties?

A crucial element in this connection may be whether the final decision on the content and delimitation of the criteria is made sufficiently independently of the education institutions.

Another important consideration, as stressed earlier in the chapter, is to ensure that there is sufficient flexibility and broadness in the legislative framework to allow further development and adjustment of the criteria over time, in turn to ensure that the criteria reflect both the continuous quality development at the institutions and the academic development of the study programmes.

The ENQA panel recommends:

- that the criteria be formulated through appropriate interaction between the legislative/framework-setting and the operational agency level, and that this process guarantees sufficient independence in relation to the education institutions involved;
- that the criteria for professional programmes be developed in close cooperation with the professional associations, taking into account the criteria that already exist.

In addition, thought should be given to the element of innovation of criteria. One of the dangers of any accreditation system is that of ossification of criteria. The unfortunate result may be conservatism in accreditation decisions leading, for instance, to non-accreditation of new untraditional, innovative or cross disciplinary study programmes. An import priority is, therefore, flexible and broad legislation that opens up for further development and adjustment of the criteria.

7.19 Categories of accreditation decisions and follow-up

The number and types of categories of decisions is yet another important issue where different practice exists. Is it to be exclusively a yes/no option, as in the USA and the Netherlands? Or should it be possible to award conditional accreditation allowing the programme the possibility of meeting unfulfilled criteria within a specific deadline and subsequently being awarded positive accreditation?

International experience to date makes the answer to this question reasonably obvious. The consequence of a sharp yes/no option is that over time the system will

lose its credibility. The reason is that accreditation agencies – expert panels – shy away from giving a “no”, because the implications and consequences would be so grave for the programme or institution concerned. So far, the American and Dutch experience of accreditation clearly demonstrates this tendency.

Another point is that an accreditation process should result in a positive added value, such that study programmes or institutions are motivated to transform the process into a tool for continuous improvement, and as a management tool. This motivation would be strengthened when there was a case for a conditional accreditation instead of a final “no”.

The ENQA panel recommends that an accreditation system includes all three categories of decision, and that the credibility of the agency is consciously supported by the use of all three categories.

In the case of conditional accreditation, the agency will define a time frame and deadline within which the programme concerned must provide the further documentation to establish that it meets the criteria. This procedure secures the basis for renewed assessment and accreditation by the agency.

It must be a key goal that there is the necessary consistency and uniformity between the first accreditation and the ensuing renewed accreditation. Therefore, the operational, methodological and professional responsibility for the first and for the renewed accreditation process should be vested in the same agency.

The ENQA panel recommends that the quality assurance agency carries the responsibility for follow-up on conditional accreditation.

7.20 Consequences of accreditation

The defining characteristic of accreditation processes is that they are concluded by the making of an authoritative decision on compliance, partial compliance or non-compliance with criteria. From this follows that a key issue is how far-reaching the consequences of the individual accreditation decisions should be.

The consequences of awarding a programme accreditation should ensure public financing and grants to the students. Accreditation should also give the programme provider an added position of strength in the global market and thus attract researchers and students from abroad.

If an institution over a period of time achieves a generally satisfactory record in programme accreditation, that institution should be entrusted by government with a higher degree of freedom in a number of ways, e.g. be allowed to provide education programmes within certain areas or at some specific levels.

Refusal of accreditation will involve a number of consequences – typically loss of financial grants or loss of the right to provide specific study programmes. The consequence of a conditional accreditation is dealt with in 7.19.

The ENQA panel recommends that the consequences of accreditation are given a clear legal basis and that practical implications for higher education institutions are clearly spelled out by the new agency.

Irrespective of the combination of rewards and sanctions in any accreditation system, it is furthermore very important to be aware of the risk that a culture of compliance towards accreditation processes may emerge in the higher education system. The panel considers here the possibility that some higher education institutions will concentrate on complying with the criteria of accreditation only at the very minimum level required. Such a strategy should not be rewarding for institutions, either in the short or long term.

The issue here is a basic implication of accreditation processes. If these are to be systematic and cost efficient, the focus on a minimum criteria approach is most often a consequence. However, accreditation reports could be tailored to make evident quality results well above the minimum thresholds and to highlight which programmes have contributed with significant examples of best practice for quality.

The ENQA panel recommends that the new accreditation processes are planned in such a way that higher education institutions are encouraged to respond to the criteria applied at the highest level appropriate.

One strategy to be considered in this respect could be that the accreditation reports include a section that recognise in a qualitative manner to what extent individual programmes have excelled at a higher level than the minimum thresholds.

Under all circumstances, the panel trusts the higher education institutions to consider the desired quality level of their programmes within the overall design of the respective institution's strategy and development.

7.21 Length of the accreditation cycle

The question of the duration of a time interval or cycle between accreditations should be viewed within the context of two overriding concerns and their mutual relationship: First of all, the burden placed by the accreditation process on the institutions and their study programmes should be taken into consideration. This concern favours a longer cycle. Secondly, it is important to keep in mind the value of accreditations as a mechanism whose credibility, in terms of continuing institutional quality development and the academic development of study programmes, must be apparent. This concern favours a shorter cycle.

The ambition for a Portuguese accreditation process should therefore be that the proper balance is achieved between concern for the burden and concern for the credibility of accreditations. Other European agencies have over the years been faced with the same challenge, and the resulting best practice is reflected in the following recommendation.

The ENQA panel recommends that the length of the cycle be no less than five years, and no greater than six years.

In order to cover all study programmes within a cycle of five to six years, clustering of individual study programmes into larger discipline areas or study fields is one of the first necessary tasks for the new agency. For instance, physics study programmes at university level must all be clustered together for accreditation. The panel realises that grouping may be difficult because physics and other study programmes appear in many

different variations, but this problem has been solved in other European countries. For example, the Danish evaluation cycle of the 1990s was based on approximately 60 discipline areas covering almost all existing study programmes.

Another more serious concern that should be taken into account is the preserving effect on study programme “thinking” that can be caused by a fixed model of clustering. Ultimately, the risk is that new cross-disciplinary study programmes are prevented from being developed. The panel is, however, convinced that this risk can be reduced by paying continuous attention to the issue.

7.22 The need for an appeals forum for accreditation decisions

When ENQA, in cooperation with its European partners from higher education institutions and student organisations, drafted the proposal for the European standards it was considered a very high priority that any quality assurance system provided an appeals forum allowing the higher education institutions the formal possibility of appealing against decisions. It is particularly crucial that a system involving accreditation is characterised by a due process and appeals approach, as a negative accreditation decision will have profound consequences for the institutions involved.

The ENQA panel recommends that the formal framework and jurisdiction of an independent appeals forum be an element in a Portuguese accreditation system.

In the work process of preparing the legislation for the quality assurance agency, attention must be given to the following issues: Firstly to secure the necessary high degree of independence; secondly to define criteria for the nomination and appointment of members of the appeals forum; and thirdly to define the specific procedures for appeals.

Appendix I

ENQA review of the accreditation and quality assurance practices in the portuguese higher education

TERMS OF REFERENCE

INTRODUCTION

In the Bologna Declaration, the European Ministers emphasised the need to improve co-operation in higher education quality assurance. The Declaration mentions co-operation in the field of quality assessment within Europe. More and more countries are adopting accreditation as a tool to enhance transparency. Following the Bergen Conference, in May 2005, the Bologna Process considers a convergence of quality assurance practices in order to achieve the goals determined by the signatory States.

An emerging question with the Bologna process is that it steers the Portuguese and other European governments towards a common solution in formal terms that may find little support in the realities of national strategies towards quality assurance. One of these realities may be linked to the remarkable growth in recent years in the fields of transnational education and of what is termed new means of delivery: distance education programmes, branch campuses, franchises and more. The identification of relevant strategies is going to be a challenge in the near future. A list of possible scenarios could include:

- National strategies with an emphasis on regulation of importers or exporters of education.
- International or regional strategies based either on supra national quality assurance or on meta-recognition of established national agencies.
- Multi-accreditation implying either international recognition of national evaluation organisations and education structures or national recognition of a foreign accreditation organisation.

The Portuguese Ministry of Science, Technology and Higher Education (MCTES) commissions this review exercise, which does not conflict with the responsibilities awarded to the higher education institutions and to the quality assurance agencies under the national evaluation law (Law 38/94, 21 November; Article 9, n. 3).

This exercise was designed to ensure that the higher education system and its stakeholders gain maximum benefit from comprehensive evaluations by teams of experienced international experts and that the procedures and processes in place in the Portuguese higher education system can be benchmarked against best practice internationally.

The review is taking place in the wider context of:

- the Government's strategic objective to guarantee a system of higher education fully integrated at European level, namely in terms of quality, levels of participation and employability of graduates;
- the Government's commitment to support efforts to protect and improve the quality of academic teaching and learning, in a way that will foster participation in international networks of higher education and the full recognition of Portuguese higher education institutions and degrees;

- the Government's acknowledgement that the challenges of maintaining quality, responsiveness and competitiveness in higher education are a major priority against the background of unprecedented levels of expansion, change and diversification in the sector in Portugal;
- the Government's strategy of promoting a diversified system of higher education, coping with heterogeneous publics and able to enlarge the overall number of students in Portugal, in a way that will foster quality at the various types of institutions (i.e., both polytechnics¹ and universities);
- the Government's commitment to acknowledge the increasing importance of research, development and innovation for the knowledge society, to further support research and development in the higher education sector to achieve the highest international standards and to promote the transfer of outcomes of this research aiming at better supporting social, cultural and economic progress and maintaining the integral connection between research and teaching and their balanced development in higher education institutions.
- the Government's commitment to develop quality assurance procedures and processes, in line with best international practice and to facilitate the conduct of reviews of the effectiveness of quality assurance agencies, their procedures and their outcomes;
- the Government's commitment to increase the access of new publics to higher education and to increase the provision of lifelong education.

LEGISLATIVE BACKGROUND

The Government, through the MCTES, establishes and implements procedures for quality assurance, and arranges for a review of the effectiveness of these procedures, under the evaluation law (Law n. 38/94, 21 November, followed by Decree-Law n. 205/98, of 11 July and Decree-Law n. 88/2001, of 23 March) and/or other legislative instruments in force at the time of the review.

The National Council for the Evaluation of Higher Education, CNAVES, has a statutory function (Decree-Law n. 205/98, 11 July) to assist and assure the credibility of the process of higher education evaluation, and to review and report on the quality assurance procedures.

The evaluation law (Law n. 38/94, 21 November) determines that the evaluation of higher education includes procedures of self- and external-evaluation, with the latter attributed to "Representative Institutions, which include:

- *The Foundation of Portuguese Universities (FUP)*
- *The Portuguese Association of Polytechnic Institutes (ADISPOR)*
- *The Portuguese Association of Private Higher Education (APESP)*

In addition, these procedures should be complemented by an overall evaluation of the system of higher education (Law n. 38/94, 21 November; Article 9, n. 3), which has never been made.

The accreditation of the higher education system has been attributed (through Law 1/2003, of 6 January; article 36, n.3) to the Institutions also in charge of the

¹ In Portugal the term Polytechnics is used to characterise what is generally known as non-university higher education institutions.

evaluation process, but its practice has not been regulated and, therefore could not be implemented. As a result, the accreditation of the higher education system needs to be designed, regulated and implemented following current trends at European and international levels.

OBJECTIVES

The exercise will examine the following topics:

- a review of the available accreditation and quality assurance practices;
- a review of the *Portuguese National Council for the Evaluation of Higher Education*, CNAVES, and the related activities and procedures of “Representative Institutions”;
- a review of the available professional accreditation practices;
- recommendations that will guarantee the establishment of a national accreditation system and practices which will meet the European Standards and Guidelines for Quality Assurance in the European Higher Education Area, EHEA, as adopted by ministers in Bergen in May 2005.

This exercise should follow the European trends for an increased internationalisation of the quality assurance and accreditation approaches and agencies, as stated in the ENQA Report to the Ministers meeting in Bergen, “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (2005). In particular, the ENQA recognises the need for a cyclical review of the national member agencies, and recommends: “any European agency should at no more than five-year intervals conduct or be submitted to a cyclical external review of its processes and activities”.

TERMS OF REFERENCE

The *European Association for Quality Assurance in Higher Education* (ENQA) will appoint an International Review Team (IRT) to review the present Portuguese National Council for the Evaluation of Higher Education, CNAVES, and the related activities and procedures of “Representative Institutions” (FUP, ADISPOR, APESP). The review team appointed by ENQA will be responsible for preparing recommendations aiming at meeting the standards and guidelines for quality assurance in the European Higher Education Area, EHEA.

The review team will evaluate the quality assurance practices coordinated by CNAVES and will report on their effectiveness. The MCTES will provide other relevant statistical information on the Portuguese higher education system.

The main objectives of this task are:

- to review the accreditation and quality assurance system for Portuguese higher education and related practices.
- to advise the CNAVES and the MCTES on appropriate academic and management structures for implementing adequate quality assurance and accreditation practices.
- to promote the idea of quality as a core value that is integrated with the principal research, teaching and administrative activities of higher education institutions.
- to provide recommendations for fulfilling the European standards for quality/ accreditation agencies in the EHEA.

Guidelines and obligations

The CNAVES and the “Representative Institutions” (FUP, ADISPOR, APESP) will cooperate with MCTES in the evaluation exercise and will prepare self-evaluation reports. The ENQA will provide a set of guidelines for use by the CNAVES and the “Representative Institutions” in order to allow the preparation of their self-evaluation reports and the other parts of the review process.

Outcomes:**DRAFT REPORT**

The ENQA, through the responsibility of the review team, will provide the CNAVES and the “Representative Institutions” (FUP, ADISPOR and APESP) with a draft report on the findings of the review. ENQA will specify a period for the CNAVES and the “Representative Institutions” to comment on its contents.

FINAL REPORT

The ENQA, through the responsibility of the review team, will provide the MCTES and the CNAVES with a final report on the findings of the review. The report will also include recommendations for improvement and for achieving the European standards for quality/accreditation agencies.

The CNAVES will make the final report publicly available and will organise its public debate.

Appendix II

ENQA panel

Christian Thune was for a number of years Professor in International Politics at the University of Copenhagen, and he was Dean of the Faculty of Economics, Law and Political Science when in 1989 he was appointed by the Danish government Director of the new Centre for Quality Assurance and Evaluation of Higher Education.

During the period of 1992–99 the Centre evaluated all higher education programmes in Denmark. In 1999 Christian Thune was appointed Executive Director of the new Danish Evaluation Institute that was established by the government with the mandate systematically to evaluate all levels and sectors of Danish education.

From 2000–2005 Christian Thune was President of the European Association for Quality Assurance in Higher Education (ENQA). He was from 1997–99 a director of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). He was a member 1994–2003 of the Hong Kong Council of Academic Accreditation.

In 2000 Christian Thune was a member of the panel of experts who reviewed the Hungarian Accreditation Council (HAC) and he is now a member of the international advisory board of HAC. Christian Thune is also a member of the Quality Assessment Commission of the Catalan Quality Assurance Agency (AQU), and of the board of the Evaluation and Accreditation Organisation of Lower Saxony, Germany (ZEWA).

David Dill is Professor of Public Policy at the University of North Carolina at Chapel Hill and Director of the Ford-Foundation funded Research Program on Public Policy for Academic Quality (www.unc.edu/ppaq). From 1984–94 Professor Dill also served as Assistant to the Chancellor for Planning at UNC-CH.

Professor Dill has been a Visiting Research Fellow at the University of Manchester Business School, a Visiting Fellow at Wolfson College, Cambridge University, a Visiting Professor at the Center for Higher Education Policy Studies (CHEPS) at the University of Twente in the Netherlands, and a Visiting Lecturer at the Norwegian Institute for Studies in Research and Higher Education (NIFU). He is a Past-President of the Society for College and University Planning in the US and a Fellow of The Society for Research in Higher Education in the UK.

In 1999 Professor Dill was part of an international team that evaluated the University Grants Committee of Hong Kong's Teaching-Learning Quality Process Reviews. Professor Dill has also been a consultant and/or evaluator on quality assurance to the Finnish Higher Education Evaluation Council (FINHEEC), the University Grants Committee in Hong Kong, the Hong Kong University for Science and Technology, the Council of Universities in Ontario Canada, the Swedish National Agency for Higher Education, and in the US to the Iowa Board of Regents, The University of Missouri System, and the Western Association of Schools and Colleges Accreditation Agency.

Helmut Konrad has since 1984 been a full professor of History at the University of Graz and he has received a number of academic honours and held important positions in the field. He was from 1987 dean of the Faculty of Humanities. From 1993–97 he

went on to serve as Rector of the university and after his period as Rector he continued till 1999 as Pro-rector. From 1995–98 he was Vice-president of the Austrian Rectors' Conference.

Helmut Konrad was from 2000–2005 President of the Austrian Accreditation Council and he has since 1999 been a member of the German Accreditation Council.

From 2004–2005 Helmut Konrad was a member of the ENQA Board.

Gemma Rauret has developed her academic career at the University of Barcelona, in the Analytical Chemistry Department as well as in the Faculty of Chemistry. She became a full professor in 1984. She has been Dean of the Faculty of Chemistry and General Secretary of the University of Barcelona.

In 1998 she was appointed Director of the Quality Assurance Agency for the University System in Catalonia (AQU Catalunya) by the University Minister of Catalonia and President of the Quality Assessment Commission of AQU. As Director of AQU Catalunya she has been very active in promoting quality assessment in the Catalan university system. She has also participated in the National Plan for university assessment of the Spanish Ministry of Education as a member of the Technical Committee.

In 2006, she was appointed Director of ANECA, the national Spanish agency for evaluation and accreditation.

Gemma Rauret has been involved in various international assessment projects, including the TEEP Project I and II (Trans European Evaluation Project, ENQA) devoted to build up and test international assessment methodology for Bachelor and Joint Master's programmes. She was a member of the ENQA working group that did the initial drafting of and discussions on the European standards for quality assurance agencies of higher education.

Anette Dørge Jessen has her academic background in administration and international development studies.

She has extensive experience with evaluation and quality assurance gained from different professional contexts. She worked from 1994–1996 as desk officer in the Danish Ministry for Foreign Affairs with responsibility for the evaluation of projects funded under the Danish governmental aid and development programme. From 1997–2001 she worked for one of the major Danish private aid organisations, first as programme coordinator for the programmes in Asia and from 1999 as programme director with the overall responsibility for the strategic development and quality assurance of the entire programme portfolio of the organisation.

Since 2001 Anette Dørge Jessen has worked in the Danish Evaluation Institute, first as evaluation officer and from 2005 as director of projects with responsibility for the department for quality assurance and accreditation of higher education. She has been responsible for several major projects, including an international comparative review of agricultural science programmes in Denmark, the Netherlands, Germany and Ireland.

She is the deputy chairman of the board of the Danish Evaluation Society.

Appendix III

Professional associations

According to the terms of reference the ENQA review should take into account the existing accreditation practices regarding professional educations. In order to document these activities the ENQA panel invited a number of professional associations in Portugal to submit a brief account on their current accreditation practices.

Six associations accepted the invitation and submitted an account:

- The Portuguese Association of Technical Engineers (ANET)
- The Portuguese Order of Engineers
- The Portuguese Veterinary College
- The Portuguese Order of Architects
- The Portuguese Order of Nurses
- Portuguese Pharmaceutical Society

The ENQA panel interviewed the six associations during the site visit in Lisbon in May, 2006 in order to further elaborate the panel's understanding of the associations' practices and views on a future quality assurance system.

Appendix IV

Site visit programme

MONDAY, 15 MAY

TIME SLOT	ACTIVITY	PANEL PARTICIPANTS	PLACE
8:00 – 9:15 am	Panel meeting	All panel members	Hotel Marriott
9:30 – 11:00 am	Meeting with the Director General for Higher Education, António Morão Dias, and experts from the Ministry of Science, Technology and Higher Education (Afonso Costa, Teresa Patricio)	All panel members	Ministry of Science, Technology and Higher Education
11:00 am – 12:30 am	Meeting with José Mariano Gago, Minister of Science, Technology and Higher Education and Manuel Heitor, State Secretary of Science, Technology and Higher Education	All panel members	MCTES
13:00 – 14:30 pm	Lunch with Luis Magalhães, President of Knowledge Agency, UMIC, (Former President of Science Foundation and coordinator of first evaluation panel of R&D centres in 1996)	All panel members	Hotel Marriott
14:30 – 16:00 pm	Meeting with the CNAVES management (Adriano Moreira, President) and the self-evaluation group – Sergio Machado dos Santos	All panel members	Hotel Marriott
16:00 – 17:30	Evaluation Council for Public Universities (FUP)	Christian Thune, Gemma Rauret and Anette Dørge Jessen	Hotel Marriott
	Evaluation Council for Public Polytechnic (ADISPOR)	David Dill, Helmut Konrad and Brit Buchhave	Hotel Marriott
17:30 – 19:00	Evaluation Council for Private Universities (APESP)	Christian Thune, Gemma Rauret and Anette Dørge Jessen	Hotel Marriott
	Evaluation Council for Private Polytechnic (APESP)	David Dill, Helmut Konrad and Brit Buchhave	Hotel Marriott
20:00	Dinner with President João Sentieiro and Vice-President Lígia Amâncio of the Science and Technology Foundation	All panel members	Hotel Marriott

TUESDAY, 16 MAY

TIME SLOT	ACTIVITY	PANEL PARTICIPANTS	PLACE
9:00 – 11:00 am	Meeting with Representative Institutions for Public Universities (FUP)	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Hotel Marriott
	Meeting with Representative Institutions for Private Universities (APESP)	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Hotel Marriott
11:00 am – 13:00 pm	Meeting with Representative Institutions for Public Polytechnics (ADISPOR)	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Hotel Marriott
	Meeting with student associations: AAL FPolytechnics FAIRe FA Porto	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Hotel Marriott
13:30 – 14:45 pm	Lunch with Eduardo Marçal Grilo, Member Administration Calouste Gulbenkian Foundation; Former Minister of Education	All panel members	Gulbenkian Foundation
15:00 – 17:00 pm	Meeting with the National Committee of the Bologna Process: José Luís Cardoso, Sebastião Feyo Azevedo, João Francisco, Jorge Carvalhal, Alberto Amaral, Bruno Carapinha	All panel members	DGES
17:00 – 18:30 pm	Meeting with CRUP – Council of Rectors	All panel members	DGES
20:00	Dinner with Manuel Heitor, Secretary of State for Science, Technology and Higher Education		

WEDNESDAY, 17 MAY

TIME SLOT	ACTIVITY	PANEL PARTICIPANTS	PLACE
9:00 – 11:00 am	Meeting with representatives from one public university: Instituto Superior Economia e Gestão Universidade Técnica de Lisboa	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Universidade Técnica de Lisboa (ISEG)
	Meeting with representatives from one public polytechnic: Politécnico de Lisboa	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Politécnico de Lisboa
11:15 am – 13:00 pm	Meeting with representatives from one private university: Universidade Lusíada	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Universidade Lusíada
	Meeting with representatives from one private polytechnic: Escola Superior de Educação João de Deus	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Escola Superior de Educação João de Deus
13:30 – 15:00 pm	Lunch with President of the Coordinating Council of S&T, João Lobo Antunes	All panel members	Hotel Marriott
15:30 – 17:00 pm	Meeting with legal expert Paz Ferreira	All panel members	Hotel Marriott
17:00 – 19:00 pm	Meeting The Architects' Professional Association	All panel members	Hotel Marriott
20:00	Dinner with the Minister of Science, Technology and Higher Education	All panel members	

THURSDAY, 18 MAY

TIME SLOT	ACTIVITY	PANEL PARTICIPANTS	PLACE
9:00 – 11:00 am	Meeting with professional association for Engineering (Ordem dos Engenheiros)	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Hotel Marriott
	Meeting with Veterinarians Professional Association	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Hotel Marriott
11:00 am – 13:00 pm	Meeting with the Nurses' Professional Association Meeting with Pharmacists' Professional Association	Chair Christian Thune, Gemma Rauret, Anette Dørge Jessen	Hotel Marriott
	Meeting with the Technical Engineers' Professional Association (ANET)	Co-chair David Dill, Helmut Konrad, Brit Buchhave	Hotel Marriott
13:00 – 15:00 pm	Lunch with National Council of Education Júlio Pedrosa	All panel members	Hotel Marriott
15:00 – 16:00 pm	Meeting with teachers unions. Fenprof	Chair Christian Thune, Helmut Konrad, Anette Dørge Jessen	Hotel Marriott
	Meeting with teachers unions. SNESup	Co-chair David Dill, Gemma Rauret, Brit Buchhave	Hotel Marriott
16:00 – 17:00 pm	Meeting with Employers Association: CIP	All panel members	Hotel Marriott
18:00 – 19:00 pm	State Secretary for Employment and Professional Training	All panel members	Ministry of Labour
20:00	Dinner with Council of Associate Labs. and directors of main research centres	All panel members	Hotel Marriott

FRIDAY, 19 MAY

TIME SLOT	ACTIVITY	PANEL PARTICIPANTS	PLACE
9:00 – 10:30 am	Meeting with the State Secretary for Education Jorge Pedreira	All panel members	Ministry of Education
11:00 am – 13:00 pm	Meeting with the Director General for Higher Education and team	All panel members	DGES
13:30 – 14:30 pm	Lunch at the DGES	All panel members	DGES
15:00 – 17:00 pm	Meeting with the Minister of Science, Technology and Higher Education José Mariano Gago	Chair Christian Thune, David Dill, Anette Dørge Jessen and Brit Buchhave	MCTES
17:30 – 18:30 pm	Wrap-up meeting	Chair Christian Thune, David Dill, Anette Dørge Jessen and Brit Buchhave	Hotel Marriott
20:30	Dinner with the OECD review committee: Abrar Hasan, Daniel O'Hare, Jane Wellmann, Jon File, Michael Gallagher, Paavo Loppunen	Chair Christian Thune, David Dill, Anette Dørge Jessen and Brit Buchhave	Hotel Marriott

Appendix V

Summary list of European standards for quality assurance

This appendix lists the European standards for quality assurance in higher education. It omits the accompanying guidelines. The guidelines can be found in ENQA's report "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (2005) at www.enqa.eu.

The standards are in three parts covering internal quality assurance of higher education institutions, external quality assurance of higher education, and quality assurance of external quality assurance agencies.

Part 1: European standards and guidelines for internal quality assurance within higher education institutions

1.1 POLICY AND PROCEDURES FOR QUALITY ASSURANCE

Institutions should have a policy and associated procedures for the assurance of the quality and standards of their programmes and awards. They should also commit themselves explicitly to the development of a culture which recognises the importance of quality, and quality assurance, in their work. To achieve this, institutions should develop and implement a strategy for the continuous enhancement of quality. The strategy, policy and procedures should have a formal status and be publicly available. They should also include a role for students and other stakeholders.

1.2 APPROVAL, MONITORING AND PERIODIC REVIEW OF PROGRAMMES AND AWARDS

Institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards.

1.3 ASSESSMENT OF STUDENTS

Students should be assessed using published criteria, regulations and procedures which are applied consistently.

1.4 QUALITY ASSURANCE OF TEACHING STAFF

Institutions should have ways of satisfying themselves that staff involved with the teaching of students are qualified and competent to do so. They should be available to those undertaking external reviews, and commented upon in reports.

1.5 LEARNING RESOURCES AND STUDENT SUPPORT:

Institutions should ensure that the resources available for the support of student learning are adequate and appropriate for each programme offered.

1.6 INFORMATION SYSTEMS

Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes of study and other activities.

1.7 PUBLIC INFORMATION

Institutions should regularly publish up to date, impartial and objective information, both quantitative and qualitative, about the programmes and awards they are offering.

Part 2: European standards for the external quality assurance of higher education

2.1 USE OF INTERNAL QUALITY ASSURANCE PROCEDURES

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

2.2 DEVELOPMENT OF EXTERNAL QUALITY ASSURANCE PROCESSES

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

2.3 CRITERIA FOR DECISIONS

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

2.4 PROCESSES FIT FOR PURPOSE

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

2.5 REPORTING

Reports should be published and should be written in a style, which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

2.6 FOLLOW-UP PROCEDURES

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

2.7 PERIODIC REVIEWS

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

2.8 SYSTEM-WIDE ANALYSES

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

Part 3: European standards for external quality assurance agencies

3.1 USE OF EXTERNAL QUALITY ASSURANCE PROCEDURES FOR HIGHER EDUCATION

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

3.2 OFFICIAL STATUS

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

3.3 ACTIVITIES

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

3.4 RESOURCES

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

3.5 MISSION STATEMENT

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

3.6 INDEPENDENCE

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

3.7 EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

3.8 ACCOUNTABILITY PROCEDURES

Agencies should have in place procedures for their own accountability.

Appendix VI

Overview of recommendations

Quality assurance terminology

- The ENQA panel recommends that the name of the new agency reflects the recommendation below that the agency covers accreditation and evaluation/audit. The panel's specific recommendation bears the title "The Quality Assurance Agency" and not "The Accreditation Agency".
- The ENQA panel recommends that the new agency adopts the following definition of accreditation: The characteristic of accreditation is that the process is based on established external criteria and that the result of the process is a decision as to whether these criteria have in fact been met by the institution or programme under accreditation
- The ENQA panel recommends that academic audit be defined by the new agency as a method for evaluating the strengths and weaknesses of the quality assurance frameworks and mechanisms adopted by a higher education institution for its own use in order to continuously monitor and improve its activities and results.

National versus international accreditation

- The ENQA panel recommends that the new agency covers all Portuguese study programmes of higher education and, accordingly, that the accreditations carried out by the national professional associations do not need to continue.
- The ENQA panel recommends that higher education institutions and programmes have the formal right to let themselves be accredited by international accreditors, but on a self-funding basis and without the option of excusing themselves from the mandatory accreditations of the new Portuguese agency.
- The ENQA panel recommends that the board of the quality assurance agency has the mandate to accept or refuse reports from other national or European operators and to make all accreditation decisions irrespective of operator responsible for the process

Methods and levels of a Portuguese quality assurance system

- The ENQA panel recommends that accreditation at programme level be combined with academic audit at the level of higher education institutions.
- The ENQA panel recommends that the new quality assurance agency decides on a first cycle of accreditations at the programme level, beginning in the second half of 2007;
- The ENQA panel recommends that this first cycle covers at least the BA level of study programmes in all public and private university and polytechnic study programmes;
- The ENQA panel recommends that the new quality assurance agency announces a future cycle of academic audits and then carefully designs an academic audit process appropriate to the needs of Portuguese higher education to be introduced following the completion of the first cycle of programme accreditations;

- The ENQA panel recommends that the new agency consider introducing institutional accreditation in order to steer and regulate the number and quality of the higher education institutions.

One strong national agency

- The ENQA panel recommends establishing an agency with clear responsibilities for quality assurance and accreditation. . An independent professional board appointed by government with decision-making authority should guarantee the independence of the organization. In addition, an advisory council should be established with a broader representation of relevant stakeholders.

Independency of the agency

- The ENQA panel recommends that the operational independence of a new quality assurance organisation in Portugal be ensured through a legal framework that clearly describes the mandate and tasks of the quality assurance agency, while providing the necessary flexibility for the operational level to make necessary adjustments to operational procedures.

Data and information system

- The ENQA panel recommends that an early project of the new agency be to ensure that information for each study programme needs to be publicly available and to make recommendations to the Ministry regarding the best means of providing these data

Cross-sector reviews

- The ENQA panel recommends that the new agency establish a procedure for producing summary reports every second or third year.

Professionalism and consistency in the work of the quality assurance agency

- The ENQA panel recommends establishing an agency with a strong and highly qualified staff and with a clear division of responsibilities between external expert panels and the staff
- The ENQA panel recommends that an executive director is appointed with a strong personal profile and relevant experiences in organisation building and quality assurance.
- The ENQA panel recommends that the quality assurance agency be established on the basis of a budget which provides for a professional staff consisting of not less than twenty-five qualified members.
- The ENQA panel recommends that in the establishment phase the quality assurance agency cooperates with external consultants with international experience to advice on organisational and methodological matters.

Use and role of experts

- The ENQA panel recommends that the quality assurance agency establishes and enforces a no-conflict-of-interest mechanism in the appointment and work of its external experts.

- The ENQA panel recommends that experts are appointed through a process that ensures a balanced age and gender profile and an appropriate insight into quality assurance.
- The ENQA panel recommends that the new quality assurance agency receives the necessary funding to organise systematic training of experts for the review panels.

Use of international experts

- The ENQA panel recommends that members of external review panels typically number four-five members. Of these, at least two members must come from countries and or higher education institutions outside Portugal. At least one member must be from Portugal, but not represent a Portuguese higher education institution.
- The ENQA panel recommends that the funding of the new quality assurance agency is at a level which makes it feasible to conduct reviews in English or another international language.

Inclusion of students in the quality assurance process

- The ENQA panel recommends that the new quality assurance agency firstly ensures that it is an unconditional element in the self evaluation processes and the site visits that student representatives have a roll that can lead to actual contribution to the process. Secondly, the new agency should set up procedures that ensure that appropriateness of including students is considered when external review panels are composed.
- The ENQA panel recommends that the Portuguese government appoint representatives of student organisations to the advisory council.

Stakeholder involvement

- The ENQA panel recommends that the view of relevant stakeholders, e.g. employers and graduates, be taken into account in external quality assurance processes.

International cooperation and networking

- The ENQA panel recommends that the new quality assurance agency be given the directive and the means to engage actively at all levels of the agency in international and European cooperation and networking

Internal accountability procedures and compliance with European standards

- The ENQA panel recommends that a mid-term review of the new agency takes place by the end of 2009.
- The ENQA panel recommends that the new agency gives a high priority to a process leading towards full compliance with all the European standards and thus secures its placement in the coming European register of external quality assurance agencies at the very latest by the end of 2012.

Pre-accreditation, accreditation and relevance

- The ENQA panel recommends introducing a two-step accreditation process of pre-accreditation and ex-post accreditation in order to create a high degree of transparency and consistency in the two processes;
- The ENQA panel recommends that the final decision for provision of new study programmes be vested within the Ministry based on criteria for relevance and national concern.

Financing of the new quality assurance agency

- The ENQA panel recommends that a principle for co-financing is followed using a size parameter. The degree of variation according to the size-parameter between the highest and lowest possible contribution from the higher education institutions could then be settled between a 25 and 50 percent contribution.

The focus of the accreditation criteria

- The ENQA panel recommends that programme accreditations be based on generic as well as programme specific criteria in order to provide a comprehensive picture of the quality of the study programmes;
- The ENQA panel recommends that differentiated criteria are formulated to reflect the characteristics of study programmes offered at universities and polytechnics, respectively;
- The ENQA panel recommends that the application of the European Qualification Framework in the definition of generic cycle-based criteria;
- The ENQA panel recommends that the area specific criteria cover input, processes and learning outcome that comply with the European standards, and when relevant take into account criteria applied internationally by professional associations in the respective fields.

The process for defining the accreditation criteria

- The ENQA panel recommends that the criteria be formulated through appropriate interaction between the legislative/framework-setting and the operational agency level, and that this process guarantees sufficient independence in relation to the education institutions involved;
- The ENQA panel recommends that the criteria for professional programmes be developed in close cooperation with the professional associations, taking into account the criteria that already exist.

Categories of accreditation decisions and follow-up

- The ENQA panel recommends that an accreditation system includes all three categories of decision, and that the credibility of the agency is consciously supported by the use of all three categories.
- The ENQA panel recommends that the quality assurance agency carries the responsibility for follow-up on conditional accreditation.

Consequences of accreditation

- The ENQA panel recommends that the consequences of accreditation are given a clear legal basis and that practical implications for higher education institutions are clearly spelled out by the new agency.
- The ENQA panel recommends that the new accreditation processes are planned in such a way that higher education institutions are encouraged to respond to the criteria applied at the highest level appropriate.

Length of accreditation cycle

- The ENQA panel recommends that the length of the cycle be no less than five years, and no greater than six years.

The need for an appeals form for accreditation decisions

- The ENQA panel recommends that the formal framework and jurisdiction of an independent appeals forum be an element in a Portuguese accreditation system.

Appendix VII

Budget for initial costs of establishing the Quality Assurance Agency

BUDGET ITEM	AMOUNT IN EURO		COMMENT
	Salary	Operation costs	
Renovation of the office premises		150 000,00	
Furniture		75 000,00	
IT (network, servers, pc, printers, copiers, telephone system)		100 000,00	
Development of procedures and methods	80 000,00		
Marketing/Branding	5 000,00	40 000,00	Expenditure to produce materials that can brand and market the institution, including time for presentations to explain the new role of the agency
Recruitment	15 000,00	20 000,00	
Total	100 000,00	385 000,00	
485 000,00			

Estimated annual budget for running costs Public and Private Polytechnics

BUDGET ITEM	AMOUNT IN EURO		COMMENT
	Salary	Operation costs	
6 Academic staff	199 920,00		Based on a average salary level of 33.320 ^(note 1)
Fee for experts		80 000,00	32 experts with a fee each of 2500 ^(note 2 and 3)
Travel in Portugal		17 088,00	32 experts x 534 for travel in Portugal
International travel		35 000,00	Half of the experts are international= 16 experts x 1400 for international travel ^(note 4)
Accommodation		64 000,00	32 experts x 2000 (tentative)
Accreditation of new programmes		100 000,00	Price for each pre-accreditation (desk research): 50 x 2000. To be balanced by a fee from the institutions ^(note 5)
Production of reports		76 000,00	Price for each report: 152 x 500 ^(note 6)
Total	199 920,00	372 088,00	
572 008,00			

General assumptions:

That the total number of study programmes are 759 divided by 532 public and 227 private. The 759 study programmes are divided into 20 wider study field areas. The accreditation will be conducted within a five year cycle including four groups of study programmes per year with 38 programmes in each. New programmes applying for pre-accreditation are estimated to 50 per year.

Notes:

- 1) Salary level for lectures
- 2) 8 experts in each groups of study fields. Each group covers 19 programmes. It is recommended to split the experts into two teams with four in each (2x4) to make the process manageable in terms of number of visits, etc.
- 3) The level of fee for experts is based on the level in other countries (for instance Denmark and Holland)
- 4) The estimated cost for an international flight to and from Portugal is 1400 EURO.
- 5) The estimated cost of 2000 EURO for a pre-accreditation is based on the cost for a desk research i.e. without the involvement of external experts
- 6) 152 reports with production costs of 500 EURO each

Estimated annual budget for running costs

Public and private universities (undergraduate programmes)

BUDGET ITEM	AMOUNT IN EURO		COMMENT
	Salary	Operation costs	
12 Academic staff	399 840,00		Based on a average salary level of 33.320 ^(note 1)
Fee for experts		160 000,00	2 x 4 experts in each group = 64 experts with a fee each of 2500 ^(note 2 and 3)
Travel in Portugal		34 176,00	64 experts x 534 for travel in Portugal
International travel		44 800,00	Half of the experts are international = 32 experts x 1400 for international travel ^(note 4)
Accommodation		128 000,00	64 experts x 2000 (tentative)
Accreditation of new programmes		100 000,00	Price for each pre-accreditation (desk research): 50 x 2000. To be balanced by a fee from the institutions ^(note 5)
Production of reports		100 000,00	Price for each report: 200 x 500 ^(note 6)
Total	399 840,00	566 976,00	
966 816,00			

General assumptions

That the total number of undergraduate programmes are 1004 divided by 647 public, 299 private and 58 offered by the Catholic university. The 1004 study programmes are grouped into 40 larger fields of study with 25 study programmes in each. The accreditation will be conducted within a five year cycle including 8 groups of study fields per year with 25 programmes in each. New programmes applying for pre-accreditation are estimated to 50 per year.

Notes:

- 1) salary level for lectures
- 2) 8 experts in each group of study fields. Each group covers 25 programmes. It is recommended to split the experts into two teams with four in each (2x4) in order to make the process manageable in terms of number of visits, etc.
- 3) The level of fee for experts is based on the level in other countries (for instance Denmark and Holland)
- 4) The estimated cost for an international flight to and from Portugal is 1400 EURO.
- 5) The cost of 2000 EURO is based on the cost for a desk research i.e. without the involvement of external experts
- 6) 200 reports with production costs of 500 EURO each

Common costs for the Quality Assurance Agency

BUDGET ITEM	AMOUNT IN EURO		COMMENT
	Salary	Operation costs	
1 Executive Director	60 000,00		(note 1)
1 academic secretary to the executive director	33 320,00		(note 2)
8 Administrative staff	134 400,00		8 x 16 800 EURO (note 3)
House Rent			(note 4)
Utilities			(note 5)
Cleaning		15 000,00	(note 6)
Office supplies		8 000,00	(note 7)
Postage and courier service		12 000,00	(note 8)
Telecommunication		10 000,00	(note 9)
Maintenance of computer facilities etc.		30 000,00	(note 10)
Staff Development		50 000,00	(note 11)
International networks, conferences and seminars		30 000,00	
Board		10 000,00	(note 12)
Advisory Council		10 000,00	(note 13)
Travel costs for staff		50 000,00	(note 14)
Consultancy fees		20 000,00	(note 15)
Cross-sector reports (production costs)		20 000,00	(note 16)
Other expenditure		10 000,00	Unforeseen running expenditure
Total	227 720,00	275 000,00	
	502 720,00		

Notes:

- 1) Based on the salary level for a Director-General (Administrative Career)
- 2) Based on the salary level for lectures
- 3) Based on the salary level for Administrative Assistants
- 4) House rent is not included in the budget following the recommendation from MCTES
- 5) Expenditures for heating, water and electricity are difficult to assess. For MCTES to assess
- 6) Based on an estimate compared to the salary level for administrative assistants
- 7) Include furnitures, office supplies etc.
- 8) Based on the rough estimate
- 9) Includes expenditure for phone and internet services and is based on the experiences from the other countries
- 10) The estimated costs are based on the experiences from other countries
- 11) Include participation in courses and training seminars that support the development of staff competences. The cost for staff training is expected to decrease after a few years of establishment.
- 12) Include costs for meetings and travel. Ten annual meetings
- 13) Include costs for meetings and travel. Four annual meetings
- 14) Travel costs for staff attending seminars, conferences etc.
- 15) In the establishment phase the agency will benefit from external consultanties to advice on organisational and methodological matters
- 16) The report recommends the production of summary reports describing and analysing the general findings of the reviews. It is anticipated that the agency should produce 1 report every year. The 20.000 EURO covers salary as well as operational costs.

Total Annual Budget for the Quality Assurance Agency

BUDGET ITEM	AMOUNT IN EURO		
	Salary	Operation costs	
Polytechnics	199 920,00	372 088,00	
Universities	399 840,00	566 976,00	
Common costs	227 720,00	275 000,00	
Total annual budget	827 480,00	1 214 064,00	
2 041 544,00			

Appendix VIII

Criteria for accreditation of university study programmes and polytechnic study programmes

This appendix lists an overview of relevant criteria that may be applied in programme accreditation. The criteria are differentiated by sub-sector and include criteria for respectively university and polytechnic study programmes. Accordingly, the criteria are designed to reflect the specific characteristics of both types of programmes. Concerning the university programmes the criteria are formulated to comply with the Bologna process that specifies the general outcome requirements for bachelor and master levels. Furthermore, the criteria emphasise the research profile and capacity of the programmes. Concerning the polytechnics the criteria include on the other hand knowledge and experience from the professional practice and the professional orientation of the programme.

The two types of programmes also share many characteristics so that the criteria are:

- Formulated to comply with national legal requirements;
- Generic and function as requirements that apply to all types of study programmes within the sub-sector. The criteria are not area-specific. It is the responsibility of the study programme under accreditation and part of its self-assessment to describe the compatibility with area specific quality requirements. These if possible have been laid down in an (international) frame of reference;
- Formulated to comply with the European standards and guidelines for internal quality assurance.

Criteria for University Programmes

A: Aims and organisation

- The aims and organisation of the programme (e.g. bachelor and master) comply with relevant legalisation;
- The aims of the programme are clearly formulated and made publicly available;
- The aims are operationalised so as to allow an assessment of the extent to which they are fulfilled;
- The aims are formulated and developed in consideration of the needs and requirements of the labour market broadly defined;

B: Content and structure

- The content of the programme is appropriate for the realization of the aims of the programme (e.g. combinations and prioritizations of courses and other study elements, the balance between compulsory and optional elements and between level and scope);
- The programme complies with formal requirements for the size of the curriculum
- Progression is evident in the different combinations and prioritizations of courses and elements in the programme;
- The content of the programme includes both theoretical and practical elements;

- The programme meets relevant needs and requirements of the labour market broadly defined;

C: Competences

- The programme has formulated output-competences for bachelor and master level that are comparable with the European Qualifications Framework/the Dublin Descriptors (and with a national framework, if developed);
- The final qualifications correspond to the requirements made to a study programme in the relevant domain by other study programmes in Portugal and abroad (domain specific requirements)
- The competences are expressed both in terms of academic contents and in terms of practical applications;
- The competences clearly reflect academic and didactic principles that comply with the awarded degree and are realistic in relation to the duration of the programmes;

D: Teaching methods

- The teaching and learning methods reflect the aims of the programme;
- The teaching and learning methods reflect academic and didactic principles, which support the realisation of the aims of the programme.

E: Examination methods

- The examination methods clearly reflect academic and didactic principles and sustain the realisation of the aims of the programme;
- The examination methods are in accordance with the achievement of the intended competences of the programme;
- The examination methods are coordinated across the whole programme to ensure that all competences and other learning outcomes are achieved.

F: Teaching staff and research

- Teachers' academic, research and pedagogical qualifications reflect the aims of the programme;
- Relevant research results and methods are continually presented to the students thereby sustaining the learning environment of the programmes;
- The programme attracts qualified teachers and researchers and has a strategy which secures future recruitment;
- Teaching is largely provided by academics and researchers who contribute to the development of the subject area;
- The teaching given by the regular staff is complemented by lectures or case studies presented by external guest teachers (e.g. from the industry or other universities).

G: Admission, graduation time and dropout rate

- The terms of admission are relevant and sufficient to meet the academic requirements of the programme;
- The programme can be successfully completed within the set time.

- The programme systematically monitors graduation time and dropout rate and regularly compare these with those of related programmes to detect the effect of the strategy and possible new ways to enhance it;

H: PhD studies

- The level of recruitment of PhD students is appropriate to meet the needs for research in the future.

I: Facilities

- The IT-facilities are sufficient to fulfil the aims and intended competences of the programme;
- The accommodation and material facilities support the development of teaching and research and are sufficient to implement the aims of the programmes.

J: Employment and graduates

- The programme systematically collects and uses feedback from graduates, employers, labour market representatives and other relevant organisations in the continuing development of the programmes;
- The programme monitors the employment rate of graduates and regularly compares it with those of related programmes.

K: Internationalisation

- The programme has a strategy for internationalisation;
- The internationalisation is reflected in the content and syllabus of the programme;
- The programme offers opportunities for students to study abroad and for teaching staff to teach and conduct research activities abroad;
- The programme endeavours to attract students from abroad and to facilitate the integration of these students;

L: Quality assurance

- The programme has implemented the university's overall strategy for quality assurance in operational goals and procedures;
- The responsibility for the quality assurance mechanisms is clearly allocated at the programme level;
- The quality assurance mechanisms assure approval, monitoring and periodic reviews of the programme;
- The student assessments are based on publicly available criteria, decisions and procedures that are applied consistently;
- Procedures are in place to obtain knowledge of whether teachers are qualified and competent to teach. The results are available for external reviews;
- The teaching is periodically and systematically evaluated. The evaluations should among other things cover mechanisms for receiving feedback from students;
- The resources available for the support of student learning are adequate and appropriate;
- Relevant information for the effective management of the programme are collected, analysed and used;

- Quantitative and qualitative information on the programme is published and is up to date, impartial and objective;
- There is a systematic follow-up on the evaluations of both programme and teaching. The results of the evaluations and the plans for follow-up are available at the homepage of the university.

Criteria for polytechnic programmes

A: Aims and organisation

- The aims and organisation of the programme comply with relevant legislation;
- The aims of the programme are clearly formulated and made publicly available;
- The aims are operationalised so as to allow an assessment of the extent to which they are fulfilled;
- The aims are formulated and developed in consideration of the needs and requirements of the labour market and the relevant profession;

B: Content and Structure

- The content and length of the programme are appropriate for the realization of the aims of the programmes (e.g. the combinations and prioritizations of courses and elements relate to the balance between compulsory and optional elements);
- The programme complies with formal requirements for the size of the curriculum;
- Progression is evident in the different combinations and prioritizations of courses and elements in the programmes;
- The content includes both theoretical and practical elements in a close interaction with the professional field and/or applied research;
- The programme includes practical training that is appropriate and relevant for the profession
- The programme has clear links with current developments in the professional field and meets relevant needs and requirements of the labour market;

C: Competences and professional orientation

- The final qualifications of the programme correspond to the general, internationally accepted description of the qualifications of a bachelor (currently the Dublin descriptors)
- The final qualifications and competences are partly based on the professional profiles and/or professional competences drawn up by or in conjunction with the relevant professional field
- A bachelor from a polytechnic institution is qualified at the level of starting as a professional in a specific profession or related professional field for which a degree from a polytechnic institution is required
- A bachelor from a polytechnic institution qualifies for a master programme

D: Teaching methods

- The teaching and learning methods reflect the aims of the programme;
- Students acquire knowledge by studying professional literature, course materials that originate in the professional practice, and by interaction with the professional field and applied research

E: Examination methods

- The examination methods clearly reflect professional and didactic principles and sustain the realisation of the aims of the programme;
- The examination methods are in accordance with the achievement of the intended competences of the programme;
- The examination methods are coordinated across the whole programme to ensure that all competences and other learning outcomes are achieved.

F: Teaching staff

- Teachers' qualifications reflect the aims of the programme;
- The programme attracts qualified teachers and professionals and has a strategy which enhances future recruitment of qualified staff;
- Teaching is largely provided by staff who relates the courses to the professional practice.
- The teaching given by the regular staff is complemented by lectures or case studies presented by external guest teachers (e.g. from industry and other relevant professions).

G: Admission, duration and dropout rate

- The terms of admission are relevant and sufficient to meet the requirements of the programme;
- The programme can be successfully completed within the set time.
- The programme systematically monitors graduation time and dropout rate and regularly compare these with those of related programmes to detect the effect of the strategy and possible new ways to enhance it.

H: Facilities

- The IT-facilities are sufficient to fulfil the aims and intended competences of the programme;
- The accommodation and material facilities support the development of teaching and are sufficient to implement the aims of the programme.

I: Employment and graduates

- The programme systematically collects and uses feedback from graduates, employers, labour market representatives and other relevant organisations in the continuing development of the programme;
- The programme monitors the employment rate of graduates and regularly compares it with those of related programme.

J: Quality assurance

- The programme has implemented the overall strategy of the institution for quality assurance in operational goals and procedures;
- The responsibility for the quality assurance mechanisms is clearly allocated at the programme;
- The quality assurance mechanisms assure approval, monitoring and periodic reviews of the programme;

- The student assessments are based on publicly available criteria, decisions and procedures that are applied consistently;
- Procedures are in place to obtain knowledge of whether teachers are qualified and competent to teach. The results are available for external reviews;
- The teaching is periodically and systematically evaluated. The evaluations should among other things cover mechanisms for receiving feedback from students;
- The resources available for the support of student learning are adequate and appropriate;
- Relevant information for the effective management of the programmes are collected, analysed and used;
- Quantitative and qualitative information on the programmes is published and is up to date, impartial and objective;
- There is a systematic follow-up on the evaluations of both programmes and teaching. The results of the evaluations and the plans for follow-up are available at the homepage of the polytechnic institution.

