European Standards and Guidelines in a Nordic Perspective

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Abstract

By presenting experiences from a project of the Nordic Quality Assurance Network in Higher Education (NOQA), this paper provides a contribution to the debate on international standards and guidelines for external quality assurance agencies.

The paper argues that the European Standards and Guidelines for quality assurance represent a major step towards transparency and mutual trust across national borders. The decision to establish a register for external quality assurance agencies operating in Europe illustrates the commitment to base quality assurance of higher education on a set of joint standards.

However, the establishment of a register naturally also entails a number of challenges. The paper focuses on possible obstacles, which should be addressed in order to ensure an effective implementation of the standards and consistent assessments of agencies across Europe. The paper also suggests some ways to handle the identified challenges and present some recent developments in relation to the implementation of the European Standards and Guidelines.

Introduction

Nordic Quality Assurance Network in Higher Education (NOQA) is a forum for information dissemination, exchanging experiences and pursuing projects of mutual interest. The main objective is to create a joint understanding of different Nordic viewpoints on issues related to quality assurance of higher education. The network has a long tradition of conducting an annual joint project. The 2005-06 project, which resulted in a report published in the ENQA occasional paper series in 2006[1], focused on the – at the time of the initiation of the project - just agreed European Standards and Guidelines for Quality Assurance in the European Higher Education Area[2].

Purpose

The project aimed at sharing and comparing practices among the Nordic agencies, for mutual inspiration concerning how organisations, processes and procedures could be enhanced in light of the new European standards and guidelines. By making different national solutions known, and by sharing experiences, it was an expressed hope that the Nordic agencies could inspire each other – and maybe also other agencies around Europe – with ways of coping with present and future challenges related to the themes covered by the European standards and guidelines for quality assurance agencies. Furthermore it was an expressed desire that the project would lead to a clarification of how the European standards and guidelines for external quality assurance agencies could be interpreted and made operational for assessments of agencies' compliance with the requirements they contain. In that sense, the project also aimed to contribute to discussions at a European level - e.g. the discussions about implementation of the planned register of European quality assurance agencies - and to internal discussions in other countries, e.g. countries preparing an application for inclusion of their national agency in the register.

Focus

The project took its point of departure in The Standards and Guidelines for Quality Assurance in the European Higher Education Area as proposed by ENQA and adopted by the responsible ministers under the Bologna Process at their meeting in Bergen in May 2005. The standards and their attached guidelines are in three parts covering (1) internal quality assurance of higher education institutions, (2) external quality assurance of higher education, and (3) quality assurance of external quality assurance agencies.

The project only focused on the standards and guidelines in part 3, concerning external quality assurance agencies, and included discussions of each of the standards and guidelines in this part of the ENQA report. One exception, though, is the standard 3.1, as this refers to the large number of standards in part 2, concerning external quality assurance . This means that the project has included reflections on the following themes:

- Official status
- Activities
- Resources
- Mission statement
- Independence
- External quality assurance criteria and processes used by the agencies

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[1] *Vinther-Jørgensen, Tue & Hansen, Signe Ploug (eds.), European Standards and Guidelines in a Nordic Perspective, ENQA Occasional Papers 11, Helsinki, 2006.*

[2] *European Association for Quality Assurance in Higher Education, Standards and Guidelines for Quality Assurance in the European Higher Education Area, Helsinki, 2005.*

- Accountability procedures.

In the project report each of these standards and guidelines are discussed at a general level, focusing on the different aspects related to the wording of the text. Furthermore, the requirements contained in each standard and its attached guidelines are discussed in detail.

Outcome

The European Standards and Guidelines for quality assurance represent a major step towards transparency and mutual trust across national borders. The common reference points have generated a high degree of attention to and awareness of the importance of quality assurance both at institutional and national level. The quality assurance agencies have benefited from the fact that they are now able to benchmark themselves to a set of joint standards and expectations. This has initiated processes of reflection, development and change throughout Europe. The establishment of a register will also enhance the credibility of the work of the external quality assurance agencies.

However, the discussions and reflections in the course of the Nordic project have also pointed to a number of general dilemmas and uncertainties in the current set of European standards and guidelines for external quality assurance agencies. These have been gathered and formulated into six challenges, which are presented in the subsequent sections.

A. National traditions and legislation versus European Standards and Guidelines

Do national traditions and legislation allow an agency not to comply with the European standards and guidelines?

It is stated in the ENQA report presenting the standards and guidelines that they are designed to be applicable to all quality assurance agencies in Europe, irrespective of their structure, function and size, and the national system in which they operate.

The NOQA project indicates that these aspirations can only be met, if the standards and guidelines for quality assurance agencies are perceived as addressing the whole national system of higher education, and not only the agencies as such. The project has brought about the experience that a quality assurance agency must be regarded in the context of its national higher education system, its role within the quality assurance system and even the national culture and traditions. For instance, it gives only little meaning to ask an agency to comply with the standards and guidelines if its national legislation distributes roles in the quality assurance system in such a way that the agency cannot operate in line with the European requirements.

Thus, the standards and guidelines for quality assurance agencies do not only imply a challenge to agencies, but might also challenge institutions, governments and other stakeholders as well. In the process of a review of an agency, it seems to be an open question as to how to assess an agency operating under legislation which is not in line with European standards. Will it be necessary to change the national legislation, and later on the agency's operations, before the agency can be said to comply with the standards and guidelines? Or should the national context be viewed as a reason for allowing exemption from the European standards when considering the compliance of the agency?

B. The status of the guidelines

How can a consistent assessment of the many European agencies' compliance with the standards and guidelines be assured?

The ENQA report recommends that any European agency should, at no greater than five-year intervals, conduct, or be submitted to, a cyclical external review of its processes and activities. The reviews of agencies should include an assessment of whether the agencies are in compliance with the European standards for external quality assurance agencies. The report suggests that national agencies should normally be reviewed on a national basis, respecting the subsidiarity principle. Assuring a consistent use of the standards thus becomes a challenge. The report also attempts to pin down the dimensions that should be taken into account when assessing an agency's compliance with the many requirements.

The NOQA project has experienced that more precise threshold values regarding the different standards are required if the European agencies are to be reviewed and assessed in a consistent manner. One very important issue to clarify in this respect is the status of the guidelines. In some cases, the guidelines can be viewed as attempts to establish threshold values that provide more detailed information on how the standard should be interpreted. In other cases, they are formulated as new standards without direct reference to the wording of the standard.

In contrast, another experience of the NOQA project has been the importance of respecting the different national contexts and models when assessing an agency's compliance with a standard. Therefore, it is equally important that the wording of the standards is kept generic and open to different systems, approaches, cultures and traditions.

C. The value of informal practises

What is the value of informal practices when considering an agency's compliance with the standards and guidelines?

The ENQA report states that the generic principle applied in the formulation of standards and guidelines has the consequence that these focus more on what should be done than how they should be achieved. Nevertheless, the actual wording of the standards shows that priority is often given to written documents and formal arrangements, taking precedence over informal practices and arrangements.

The discussions during the NOQA project have shown that it is important to take into account both formal arrangements and the more informal, yet well-established, practices in order to gain a reliable picture of the actual situation of an agency. The argument goes both ways. The legislation and other formal arrangements surrounding an agency can be in full compliance with the relevant standards, but this does not guarantee that the actual practice also is in line with the European requirements. For instance, an agency can be formally independent from ministries and other formal stakeholders, but not independent in practice if the government places a high level of pressure on the agency through informal channels. The opposite situation can also be found, where an agency with poor formal foundations is actually permitted to act with a very high level of autonomy and independence.

The fact that legal documents and other formal arrangements are necessary, but insufficient factors concerning the operations of an agency, is a challenge that must be dealt with in the procedures and

methods applied in the reviews of the European agencies. There is no doubt that the assessment process will become more complicated – and the determination of threshold values more delicate – when informal arrangements and practices are to be taken into consideration.

D. Definition of central concepts
How can the terminology used in the standards and guidelines become clearer?

The standards and guidelines contain a considerable number of words assumed to be commonly used and understood by European agencies. In reality, the terms can be interpreted in different ways, and might very well gain different meanings as they are translated from English into other European languages.

The work with the standards and guidelines in the NOQA project has pointed to a number of terms which may need further clarification. One example is the term policy. What is a policy, and what should be the minimum requirements for the content of a document if it is to qualify for the label policy? Another example is the term procedures. Can procedures be well-established habits or cultures, or must the way to conduct operations be described in writing if it is to be accepted as a procedure? If the latter is the case, yet another question is how long must it have been in operation to be accepted as more than just a piece of paper? A similar line of questioning arises concerning the terms: goals and objectives, legal basis, management plan, mechanisms, etc.

Reflections on the meaning of these terms might be useful to both agencies and their assessors, but it is equally important that such reflections do not result in formulations that are too narrow and prescriptive.

E. The impact of non compliance with specific standards
Must an agency comply with all standards in order to be considered as being in compliance with the European standards and guidelines?

The ENQA report explicitly demands that agencies should comply with all standards if they are to be included in the planned register of external quality assurance agencies operating in Europe. This might imply that very few agencies could be accepted as being in compliance with European standards unless the agencies (or national governments) are willing and able to immediately follow-up on their shortcomings.

The discussions during the NOQA project concerning the Nordic agencies' compliance with the standards have shown that, although their operations in general have a very high level of compliance with the intensions behind the standards, specific operations and circumstances of minor importance can make compliance with certain standards questionable. This can, for instance, be due to national legislation, e.g. legislation concerning the role of an agency in the follow-up on external quality assurance processes.

The experiences of the NOQA project suggest that while a review process conducted by a panel of peers or experts should include an assessment of the compliance with the individual standards and their attached guidelines, it should be possible for a Register Committee to make an overall assessment, distinguishing between vital and less vital requirements of the European standards.

F. The demands to reviews of agencies

Which demands should be made to assure a credible review process, including assessment of the agencies' compliance with the European standards and guidelines for external quality assurance agencies?

The ENQA report assumes that review processes of agencies will primarily be organised at the national level. Although a growing interest for reviews organised by ENQA has been notable, an assessment of the credibility of the review process, and of the quality of the documentation in the review report, becomes an important and separate task for a Register Committee.

An important experience gained from producing national descriptions and assessments in the NOQA project is that such written accounts need to be discussed and clarified in order to understand the actual nature of processes and procedures, etc. Each agency tends to interpret the requirements of the standards and guidelines from their own national perspective, and the same terminology might have different implications and meanings in different countries[3].

The NOQA project suggests that the reviews of agencies should be thorough, and that it should be considered making a site-visit a mandatory element in the process in order to ensure the necessary documentation. This would enable the peer review group, or expert panel, to gain a deeper understanding of the working mode of the agency subject to review, including its interpretations of the standards and guidelines.

The independence of the peers or experts conducting a nationally organised review of an agency will, of course, be another important issue for a Register Committee to consider.

Recent developments

The European standards and guidelines for quality assurance agencies were created with the objectives of providing common reference points for agencies and of being used as the frame of reference in assessments of agencies applying for inclusion in the planned register for quality assurance agencies active in Europe. Since the political adoption of the Standards and Guidelines for Quality Assurance in the European Higher Education Area, and since the Nordic project referred to in this paper was finalised, a number of important decisions have been taken.

One development is that so-called E4 Group[4] finalised a proposal for the specific design of the planned register for quality assurance agencies operating in Europe in February 2007. The European Ministers of Education are expected to adopt the proposal and decide on the establishment of the register at their Bologna Summit in London in May 2007. The proposed design implies an exclusive register providing clear and reliable information about quality assurance agencies operating in Europe which conform to the European standards and guidelines for quality assurance agencies. Similar to one of the outcomes of the Nordic project, the design seems to acknowledge that a distinction between vital and less vital standards and guidelines is relevant. Furthermore it states that the Standards and Guidelines for Quality Assurance in the European Higher Education Area probably will need to be revised from time to time. This will hopefully imply a definition of some

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[3] *This experience is very much in line with the conclusions in Crozier, Fiona et al., Quality Convergence Study, ENQA Occasional Papers 7, Helsinki, 2005.*

[4] *The partners in the E4 Group are ENQA, ESIB (students), EUA (universities), and EURASHE (colleges).*

of the central concepts, a clarification of the status of the guidelines and the establishment of clearer threshold values regarding the standards.

Another development is that ENQA has changed its membership regulations so that an applicant body will be required to satisfy the Board that it meets the European Standards and Guidelines concerning quality assurance agencies if to be accepted as full member. In relation to this ENQA has published guidelines for national reviews of ENQA member agencies. The guidelines are intended to help member agencies ensure that their national reviews will produce the information needed to satisfy the requirements of ENQA membership.

Like the suggested design of the register, these guidelines contain some expectations to the review process that - when followed - may assure that some of the challenges identified in the Nordic project can be overcome. One example is that the guidelines, though implicitly, make a site visit mandatory. Another is that they stress the importance of the independence of the experts and the management of the review process in general.

Furthermore, ENQA has established a "Committee for member reviews" to handle the initial scrutiny of member review reports and make recommendations to the Board. The recommendations from the Nordic project to the tasks and abilities of the Register Committee also apply to ENQA's committee. For the purpose of consistency it seems relevant that the two committees - in a transitional period - engage in a common discussion of vital and less vital standards and agree on requirements to the credibility of the review process. In the long term, one could imagine that ENQA would rely on the assessments and decisions of the Register Committee.

Recent developments also include the implementation of the first European Quality Assurance Forum in November 2006 in Munich which provided an opportunity to discuss European developments in quality assurance. A seminar on the implementation of the European Standards and Guidelines for Quality Assurance in Higher Education organised by ENQA in cooperation with the Central and Eastern European Network (CEEN) which took place in December 2006 in Vienna should also be mentioned. The main goal was to analyse the contents and implementation of the European Standards and Guidelines from the viewpoint of the European quality assurance agencies.

Finally, an initiative has been taken to establish a forum for cooperation on the internal quality assurance of the ENQA member agencies. One purpose of this IQA network is to discuss relevant interpretations of the European Standards and Guidelines as regards accountability procedures of agencies. The Danish Evaluation Institute (EVA) is the initiator and will host the first meeting of the network in April 2007.