

International Benchmarking of External Quality Assurance Agencies (Looking in from Top to Bottom)

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EXTERNAL QUALITY ASSURANCE AGENCIES**

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March 2008

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Preface

This is the Report of a benchmarking project between ACQUIN (Accreditation, Certification and Quality Assurance Institute), AUQA (Australian Universities Quality Agency) and HETAC (Higher Education and Training Awards Council). Each of these agencies recently underwent a self-review and external evaluation, which provided the basis for the benchmarking relative to internationally accepted standards.

The decision of the three agencies to participate in this unique exercise stems from their desire to place these recent external panel evaluations in an international context. Specifically, this project offers an opportunity to share experience and learn from each other in asking the fundamental question – who has responsibility for quality assurance? The standards developed by trans-national agencies such as ENQA and INQAAHE offered a framework within which such experiences could be shared. While the national systems, organisational contexts and operational environments are different for ACQUIN, AUQA and HETAC, it is possible to identify some common strands in the conduct of their own self-reviews and the external evaluations. This facilitates the emergence of some views on the sharing of good practices and the lessons that were learned, which may also serve to offer some guidance for peer agencies embarking upon similar exercises.

Based on their variety of experiences, the participants intend to offer some views on the extent to which the standards promoted by ENQA and INQAAHE may assist the transformation process from written statements into reality. In many respects, this lies at the heart of debates on quality assurance — per the many quality assurance manuals found on shelves. Higher Education Institutions (HEIs) must be genuine living documents which permeate all strands of their operations. The authors also believe that there are inherent risks in the uncritical promotion of common standards, in that they can easily become set in stone – advocates of quality assurance must also be “creative destroyers” of unquestioned assumptions. They must challenge some of the comfort zones which exist in higher education and encourage all of those in the system to embark on the quality assurance journey.

Planning for this project commenced in December 2005. It was then agreed that all three agencies would use the ENQA standards (reference standards 2.1 to 2.8 and 3.1 to 3.8) as a template to map the outcomes of the respective self-reviews and external panel reviews. While the broad structure of the Report was agreed early in 2006, the final structure was agreed to during the course of meetings between representatives of the three agencies at ACQUIN offices at Bayreuth in September 2006. Unless it is indicated otherwise in the text, organisational arrangements described in the benchmarking were those that applied at that time.

It was agreed all three agencies should place the input to the evaluations at each others’ disposal, and address fundamental questions which would serve to benchmark each review. These questions form the structure of this Report. It is also important to state that the exercise is not an attempt to rank one approach over another. Such an approach would have been counter-productive, and minimised the opportunity to genuinely learn from each other.

This project commenced in earnest in September 2006. For this reason, the ENQA standards and *INQAAHE Guidelines of Good Practice* in operation at that time served as the benchmarks for this project. Furthermore, during the course of 2007, the authors presented papers on its deliberations at the biennial INQAAHE conference in Toronto (March 2007) and at the European Quality Assurance Forum in Rome (November 2007). The authors were grateful for feedback received during these deliveries and took on board comments and observations from their peers.

The authors would like to thank ACQUIN for the courtesy and hospitality extended during the course of their visit.

Finally, in the course of this project, ACQUIN suffered the loss of two dear friends and colleagues. The authors dedicate this report to the memories of Dr Stefanie Hoffman and Professor Klaus Wolff. Stefanie's vision led to this project. Her sad and untimely death in July 2006 created a vacuum in this project which was ultimately filled by Klaus. Both Ian and Rob worked with Klaus during September 2006. Even in the context of our short stay in ACQUIN offices, his love of higher education and his determination to ensure the centrality of the student to our deliberations was very clear to us. The authors hope that this Report in some small way bears testament to their work, and fulfils their ambitions for the project.

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February 2008

Chapter 1: Introduction to the Agencies

*This Chapter, along with **Appendix A** and **Appendix B**, introduces the reader to the three agencies involved in this unique project. It also outlines the quality philosophy underlying their operations. Finally, some conclusions are drawn on the similarities and differences between the three agencies and their missions.*

NATIONAL CONTEXT

HETAC

Ireland is a parliamentary democracy with a written constitution (*Bunreacht na hÉireann*). It is a unitary State and, in terms of education, has a very highly centralised education system. The Minister for Education and Science has overall responsibility for all education matters, ranging from pre-school to higher education. The higher education in Ireland which follows the binary model is provided by seven universities, fourteen institutes of technology (IoTs, otherwise known as recognised institutions) and over thirty other providers of various size and character. HETAC is the awarding body for providers of higher education and training other than the universities and the Dublin Institute of Technology. However, other providers availing themselves of HETAC services are private providers of higher education; specialist public services providers, including the Garda (Police) College and the Military College; or specialist providers centered on specific disciplines. All providers may run programmes from Certificate level up to PhD doctorate level.

The higher education landscape in Ireland is one which has seen rapid growth in recent decades. The participation rate has risen from 11% in 1965 to 57% in 2003. In 2003/ 2004, there were some 134,000 students in all State-aided higher education institutions. Of these, some 54,000 were in the IoT sector, while an additional 5,000 or so were in institutions with HETAC accredited programmes. Since 1996, full-time undergraduate students are not liable for course tuition fees. In this environment, public higher education institutions rely substantially on the State for their source of income. The OECD¹ noted that the State contribution to the university sector was 85%, while the corresponding figure for the IoT sector was 90%.

ACQUIN

Germany has a federal system in which the 16 States (*Laender*) are autonomous in passing their own university laws (*Landeshochschulgesetze*) concerning higher education and the establishment of new Higher Education Institutions (HEIs). Most of the German HEIs are State run and officially recognised and, as such, are fully or partly funded by the States. However, cooperation in higher education was achieved through the Standing Conference of the Ministers of Education and Cultural Affairs (KMK). Before 1999, the responsibility for contents, organisation and examination procedures of study programmes and quality of higher education rested with the 16 States who defined the framework regulations for studies and examinations. The introduction of the Bologna-Process in Germany, which began in 1999, caused an immense paradigm change through the implementation of the two-cycle degree structure bachelor/master. As such, the framework regulations for studies and examinations with their strong input orientation were no longer applicable.

In 1999, the possibility to design new study programmes that were learning-outcome oriented instead of input-oriented gave more autonomy and responsibility to the HEIs, not only in implementing these new degree programs but also for quality assurance. This shift in the relationship between the Laender and the HEIs led to the implementation of the accreditation system in Germany with the establishment of the German Accreditation Council (*Akkreditierungsrat AR*). It was given the authority for accreditation of agencies, whose major tasks are the accreditation of individual study programmes. All HEIs implementing bachelor and master programmes have to approve the quality of their courses through external quality assurance (accreditation).

ACQUIN is one of six accreditation agencies in Germany and is accredited by the German Accreditation Council (AR). It is authorised to accredit study programmes and award the seal of the AR. The core competence is in the assessment and accreditation of degree programmes based on an outcome-orientated approach across a variety of HEIs within Germany and abroad.

Currently, in Germany, there are 383 State and officially recognised HEIs with 124 universities and equivalent colleges, 206 universities of applied sciences (*Fachhochschulen*) including colleges of public administration, and 53 colleges of art and music. In 2006/2007, 1,970,000 students were registered in a total of 11,800 study programmes. Meanwhile the percentage of the bachelor and master programmes of the entire study options is 48% with 3,370 bachelor and 2,280 master courses offered.

AUQA

Like Germany, Australia also has a federal system of government where power is shared between the Government of the Commonwealth of Australia (the federal government) and the governments of the nation's states and territories. The six Australian states are essentially self-governing in certain areas designated under the Constitution, while the two "territories" (Australian Capital Territory and Northern Territory) are more directly controlled by the Commonwealth. In the Australian higher education system, the Commonwealth Government sets national policy directions and is the major source of public funding, while the states and territories have the legislative authority to pass Acts establishing new universities. They also have established statutory bodies or government departments with the power to recognise non-university providers of higher education and to approve the quality of their programs by subjecting them to external accreditation.

There are currently 39 Australian universities and four other non-university self-accrediting institutions² (SAIs) that are subject to "whole-of-institution" quality audit by AUQA. The scope of this type of audit is very broad, and in theory could focus on anything that is done in the name of the auditee. In 2005–2006 approximately 950,000 students were studying for higher education awards in Australia, of which approximately 170,000 were full fee-paying international students. There are also approximately an additional 60,000 international students studying for Australian higher education awards overseas. This explains why AUQA pays particular attention to auditing both onshore and offshore operations. In addition, AUQA is required to quality audit the higher education accreditation functions of the Commonwealth and the states and territories approval bodies for the non self-accrediting part of the sector (see Section 1.2 below). Such bodies are usually attached to a state or territory education bureaucracy, or set up as a qualifications authority.

The non self-accrediting higher education sector in Australia is also subject to considerable growth, but reliable figures on the number of students studying in it are currently not available.

Appendix A contains a detailed profile of the organisational context of each partner agency in this project, while **Appendix B** outlines the operational processes to support the delivery of the organisation objectives.

QUALITY PHILOSOPHY – "THE VISION"

HETAC

In advance of any discussion on the vision of HETAC, it is important to note the ever-changing landscape of higher education in Ireland. In its most recent strategic plan³, HETAC identified a number of key drivers of changes which impact on different areas of its remit. These included, for example, the changing nature of the Irish economy. In the 1990s, Ireland was labour intensive, with foreign industry employing well-educated and skilled persons in the manufacturing environment. More recently, a combination of increasing labour costs and the impact of globalisation on Ireland's very open economy led the Government to conclude that Ireland required a world-class research base which would

allow enterprises to move up the “value chain” and to attract the high value research arms of industry. This change has influenced providers and, specifically, the IoTs. There is now an increased focus on the needs of individual learners by ensuring their departure with an award of standing which will enhance their capacity to contribute to society.

In its strategy statement, HETAC articulated its vision that by 2010 providers will view the services undertaken by HETAC as an important value-added component in fulfilling their role. Furthermore, its firm intention is that HETAC will be recognised in Ireland and internationally as the principal agency of assurance of standards and quality in its sector. It will also be a source of opportunities and encouragement for higher education providers to achieve increasingly higher levels of quality.

The underlying philosophy of HETAC is one of partnership or collaboration with providers. This requires a generosity of spirit and flexibility in its dealings with providers, recognising that the “one size fits all” approach is no longer suited in today’s context. While HETAC wishes to avoid this model, it does expect the provider as the main owner of the quality assurance processes to build such processes to suit their specific needs. HETAC evaluates the HEIs on that basis. However, such flexibility must also be measured — it is critical for any stakeholder to have the confidence in the integrity and consistency of its operations. This approach is in keeping with the values espoused by HETAC, including policies supportive of learners and those engaged in the delivery of higher education.

As an organisation, HETAC also has a vision for itself. It wishes to conduct its business in a professional manner operating in accordance with good corporate governance principles and to international best practice.

HETAC views quality assurance as a tool for improvement and encourages providers to embed it at the heart of their activities. For this reason, in addition to the formal quinquennial reviews, quality assurance is reviewed at other intervals in the context of programmatic reviews and individual programme accreditation panels. HETAC’s quality assurance policies are built on the idea of “fitness for purpose” — each formal review is set in the context of the provider, their strategic objectives and the regional and social environment in which they operate. The rapid expansion of higher education provision, including the growth in the number of providers and learners, as well as diversification in terms of providers, learners and programmes, has led to growing concern about the quality of higher educational provision. External verification of the quality assurance policy and procedures of providers is necessary to provide some degree of accountability and transparency. It does not imply that there may be something wrong.

ACQUIN

ACQUIN is an instrument of and for HEIs and reflects the expressions of the Berlin Communiqué, its view is that all responsibility for quality assurance lies in the HEIs themselves. ACQUIN seeks to achieve its vision through the following objectives:

- (a) *The accreditation procedures of ACQUIN are recognised in the public and in HEIs as independent, fair, transparent, constructive, correct, useful and they promote the quality of study programmes.* The accreditation procedures are developed having regard to the principle of respecting and protecting HEI autonomy and academic freedom. This ensures acceptance of the analyses, assessments and judgements which ACQUIN makes. ACQUIN has established a reliable and transparent accreditation procedure which ensures the independence and objectivity of all persons involved.
- (b) *The work of ACQUIN promotes the quality culture in the universities through its Fitness for and Fitness of Purpose Approach.* In accordance with its principles, ACQUIN evaluates study programmes on the basis of the degree programme profile, which has been defined autonomously by the HEI, having regard to its mission and competence. Each HEI is therefore required to define its own quality definition and the objectives of the degree

program. This is often the first time that HEIs start to discuss and develop their own quality definition according to their own profile

- (c) *ACQUIN gives impulses for a constant enhancement and for new procedures of quality assurance within higher education.* The Bergen Communiqué exhorted HEIs to continually improve quality. Against this backdrop, ACQUIN developed a two-year pilot project aimed at optimising process quality for teaching and study programmes as well as to develop and implement a process accreditation procedure, as part of Project Q launched by the German Rectors' Conference (HRK).

AUQA

AUQA's core activity is set out in the first two objectives referred to previously. AUQA emphasises self-audit, which may be either a specific activity carried out in preparation for external audit or a standard part of the auditee's own quality processes. AUQA then uses the "fitness-for-purpose" process of *quality audit* against the auditee's own objectives, i.e. it investigates the extent to which institutions and agencies are achieving their missions and objectives.

With this in mind, AUQA's vision can be articulated as follows:

- (a) *AUQA's judgements will be widely recognised as objective, fair, accurate, perceptive, rigorous and useful.* To achieve this, it has established detailed and effective procedures for audit that include auditor appointment and training, extensive and thorough investigation, and consistent implementation.
- (b) *AUQA will work in partnership with institutions and accrediting agencies to add value to their activities.* Its audit is based on self-review, acknowledges the characteristics of the institution or agency being audited, and accepts comment from the auditee on the best way of expressing the audit findings.
- (c) *AUQA's advice will be sought on matters related to quality assurance in higher education.* To fulfil this, it undertakes consulting activities, including workshops and publications in addition to the maintenance of a database of good practices.
- (d) *AUQA will be recognised among its international peers as a leading quality assurance agency.* On this basis it will build international links to learn from and provide leadership to other agencies, and will work with other agencies to the benefit of Australian institutions.

CONCLUSION

Each of the three organisations decided to embark on the process of external review with a clear view of self-improvement. In the case of HETAC and ACQUIN there was an added imperative of evaluating their performance against the recently articulated standards by ENQA. No such imperative existed for AUQA. The process must be viewed against the backdrop of the organisational context of the three agencies, some aspects of which are as follows:

- (a) Both HETAC and ACQUIN are legislatively based, with their mission and objectives set within such framework. AUQA is the product of a political decision of the federal Ministers with responsibility for higher education.
- (b) In terms of mission, AUQA is focused very directly on quality audit, while HETAC's remit embraces both programme accreditation and quality assurance. ACQUIN's mission is very much within the programme accreditation domain and quality assurance is pursued within that context.
- (c) All Australian HEIs are subject to quality audit by AUQA, while HETAC is responsible for the Irish extra-university sector, both State-aided and private providers. In the case of ACQUIN, HEIs may avail themselves of accreditation services from any of the six accreditation agencies in Germany.

- (d) Income from the government (either at federal or central levels) represents a substantial part of the income for AUQA and HETAC, while ACQUIN relies on income accrued from the provision of its services.
- (e) All three agencies have made efforts to include stakeholders within their Boards/ Councils, and have representation from and external to the higher education system. In the case of ACQUIN and HETAC this wider representation extends to further governance and regulatory processes, including programme accreditation panels, and for AUQA, participation in its audit panels.
- (f) As noted, AUQA is required to audit the higher education accreditation functions of the Commonwealth and the states and territories approving bodies for the non self-accrediting part of the sector. This aspect of AUQA's quality function is actually more akin to the role played by AR/Foundation in Germany, in formally reviewing higher education accrediting bodies such as ACQUIN. This particular function distinguishes AUQA significantly from the other two agencies in this benchmarking exercise.
- (g) Reflecting more on their mission, HETAC and ACQUIN make extensive use (*including the delegation of decision-making power*) to a subcommittee structure to assist their Board /Council in the performance of its role.
- (h) The consequence of the decisions of the three agencies impacts in different ways. While HETAC and ACQUIN could potentially impact on the financial viability of the provider, AUQA relies on the reaction of the public to generate an appropriate response to an adverse report about an organisation.

However, despite all of these differences, the engagement of all three agencies with their constituencies is predicated on the desire to embed quality improvement in higher education. All agencies recognise the need to promote institutional ownership of quality assurance processes, which will ultimately increase the relevance of higher education to the economic and social fabric of their respective countries.

Looking at the operational procedures detailed in **Appendix B**, it is possible to identify some common threads. For example, while the processes may vary between accreditation and quality assurance reviews, all organisations use a panel of peers with the capacity to deliver independent judgements. Those appointed to the panel also represent the diversity of stakeholders within the higher education community. Both the ACQUIN and the HETAC approach to accreditation are closely aligned, with emphasis placed on the site visit and role of the organisational representative playing a key role in managing the process, including report preparation, but with no involvement in the decision of the panel. Similarly, the self-evaluation report forms the central platform of the quality assurance review, a task which requires the institution to critically evaluate its processes and procedures. The same conclusions apply equally to AUQA in its role as the national quality auditing body in the Australian higher education sector.

At this stage, the emerging evidence is that across a diverse group of agencies the desire to realise best practice will always bring forward certain key aspects (selection of panel members, independence of panel decision, use of self-evaluation reports, etc.), which are common in such organisations. But in order to determine what good practice is, it is necessary to critically analyse the effectiveness of such quality processes against some known standards or clearly stated assessment criteria. On the other hand, to only evaluate oneself against such criteria is in itself insufficient. First, the nature of the outcome will depend very much on the agency's main motivating factor in undertaking a review and on the intensity of the evaluation undertaken. For example, was it for basic compliance or for continuous improvement? Second, such evaluations must be externally validated by a body of recognised expert peers.

These issues are taken up in **Chapter 2**.

Chapter 2: Yes, but is it good practice?

This Chapter outlines the approach to the external reviews adopted by each agency and details the outcome of the reviews by reference to the European Standards and Guidelines (ESG)⁴, in particular those standards detailed in Parts 2 and Parts 3 of the ESG. In order to facilitate comparison, AUQA mapped the INQAAHE Guidelines of Good Practice (GGP) against the appropriate standards of the ESG.

And what is good Phaedrus, and what is not good, need we ask anyone to tell us these things?⁵

A central proposition of this benchmarking project is that in order to answer a question about “values” with any degree of certainty, it is necessary to bring an external (i.e. third party) perspective to the question at issue. A self-assessment or self-evaluation of “what is good” and what can be improved, whether performed by an institution, or by an External Quality Agency (EQA), is a necessary but insufficient condition for the purpose of achieving assurance of quality. Unless subject to some form of external validation, pure self-assessment no matter how detailed and well executed is always only a self-referencing activity. This axiom applies equally to the assessment of the academic work of undergraduate or PhD candidates performed by universities, as it does in reviewing the work of EQAs. Not only that, the third party perspective being brought to the validation must be a judicious mix of relevant technical expertise and detached external stakeholder perspective.

ACQUIN, AUQA and HETAC all routinely employ a combination of self-assessment / evaluation and external peer-review processes in the performance of their core quality assurance functions, albeit for different purposes, such as programme accreditation or institutional audit. Similarly, ACQUIN, AUQA and HETAC each undertook a self-review of its own quality assurance functions, which was then subject to review by an external third party.

By such process, it is possible to test the quality of the judgements being made or delivered and state what was found to be “good” and what was “not good” with some degree of external validity.

The three benchmarking partners then took this external testing process a step further by exchanging the three complete sets of review findings in order to share good practice and to learn from each other’s experiences in order to improve. In effect the three benchmarking partners each asked the others, “What is good practice in QA, and what is not good practice in QA?” based on their experience of external reviews.

HETAC AND THE EUROPEAN STANDARDS AND GUIDELINES

In 2006 HETAC was evaluated to determine compliance with the ESG. The composition of the seven member panel was:

- Dr Séamus Smyth, President Emeritus, National University of Ireland, Maynooth
- Ms Marion Coy, Director, Galway-Mayo Institute of Technology, Ireland
- Dr Steven D. Crow, Executive Director, Higher Learning Commission of the North Central Association of Colleges and Schools, Chicago
- Reverend Darren McCallig, former Education Officer, Union of Students in Ireland
- Dr Angelika Schade, Chancellor, Fachhochschule im Deutschen Roten Kreuz, Goettingen, Germany
- Mr Norman Sharp, Director, QAA for Higher Education, Scotland.

The panel secretary was David Perry, former Assistant Principal and Dean of Academic Quality and Standards Service, Southampton Solent University, England.

In preparation for the review, HETAC undertook an extensive exercise which resulted in the Self-Evaluation Report. This exercise included a media campaign to solicit submissions for stakeholders, stakeholder surveys and a series of internal reports. In addition to this material, the panel conducted a series of interviews with stakeholders drawn from providers, peer agencies, the Department of Education and Science, Higher Education Authority and professional bodies.

The External Panel offered the following observations on HETAC's compliance with the ESG that apply to EQA (Parts 2 and 3):

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

2.1 Use of internal quality assurance procedures

HETAC has agreements with its providers of the way in which external quality assurance procedures relate to internal procedures.

2.2 Development of external quality assurance processes

HETAC has developed valid processes for external quality assurance procedures, underpinned by extensive stakeholder involvement. Guidelines for the external quality assurance processes have been developed and are available.

2.3 Criteria for decision

HETAC has clearly defined criteria for decisions.

2.4 Process fit for purpose

The quality assurance policies by HETAC are built on the idea of "fitness for purpose". Each formal review is set in the context of the provider, their strategic objectives and the environments in which they operate. The development processes have been shown to be fit for purpose. Through the self-evaluation process HETAC has also identified improvement areas in its processes.

2.5 Reporting

While HETAC has a policy of publication of its reports, this did not apply to all reports. The panel recommended that consideration should be given to all reports as a matter of principle.

2.6 Follow-up procedures

HETAC recognised through the self-evaluation process that there is a need to give greater attention to the transparency and effectiveness of mechanisms for follow-up procedures. A more systematic and transparent approach will be taken to following-up the implementation by providers of recommendation or conditions made by the expert panels.

2.7 Periodic reviews

All providers have to undergo a review at periodic intervals. Programmes are accredited typically for five years. Re-accreditation is subject to the review of a programme.

2.8 System-wide analysis

An analysis of degree, diploma and certification awards as well as a review of award classifications was already carried out. However, as part of the self-evaluation HETAC identified the need for further system-wide analysis to be undertaken.

European standards for external quality assurance agencies (Part 3)

3.1 Use of external quality assurance procedures for higher education

HETAC has taken account of the presence and effectiveness of external quality assurance processes.

3.2 Official Status

HETAC was established in June 2001 under the *Qualification (Education and Training) Act 1999* as one of three bodies established under the Act. HETAC is a State body.

3.3 Activities

HETAC undertakes on a regular basis external quality assurance activities at institutional and programme level.

3.4 Resources

HETAC has appropriate resources (human and financial) to organise and run external quality assurance processes in an effective and efficient manner.

3.5 Mission Statement

HETAC has a clear mission i.e. the development, promotion and maintenance of higher education training awards to the highest international standards and quality. Through the increased use of delegated authority, HETAC was allowed to increase its focus on the implementation of strong quality assurance processes among its providers.

3.6 Independence

Under the Act, HETAC has a very high degree of independence and autonomy. The decisions made are not influenced by third parties. HETAC is also independent of its providers.

3.7 External quality assurance criteria and processes used by the agencies

The process, criteria and procedures used by HETAC are predefined and publicly available on its website and in printed form in some cases.

3.8 Accountability procedures

HETAC has put in place procedures for its own accountability.

ACQUIN AND THE EUROPEAN STANDARDS AND GUIDELINES

ACQUIN was formally required to undergo a re-accreditation procedure by the Accreditation Council in 2006. The re-accreditation was based on the “Criteria for Accreditation of Accreditation Agencies” which were developed by the AR according to the ENQA Standards and Guidelines in December 2005. This means that they were considered in the external review without direct reference to them later in the final report.

The composition of ACQUIN’s external expert panel was:

- Professor Dr Johann Schneider, member of the AR (chairperson)
- Professor Dr Konstantin Meskouris, RWTH Aachen University (national expert)
- Dr Stefan Bieri, president of the Swiss Federal Commission of Universities of Applied Sciences (international expert)
- Stefanie Geyer, student representative, Marburg University.

During the audit ACQUIN was reviewed against the criteria of the AR and against its own mission and objectives. The external review was therefore also carried out under the light of the fitness for and fitness of purpose approach. The assessment was therefore an overall assessment of ACQUIN’s work.

The following table, Table 1, shows the correspondence of the AR criteria with the ESG criteria 3.1 to 3.8 (Part 2 of the ESG is also included in Part 3, and therefore it is also included in the German Accreditation Council (AR) criteria).

Table 1

European Standards and Guidelines Part 3	Criteria for the Accreditation of Accreditation Agencies and Foundation Law: Establishment of a Foundation for the Accreditation of Study Courses in Germany
3.1	Criteria Part I (Agency's general institutional functionality and fitness for purpose) and Part II (Content-related quality elements of programme accreditation).
3.2	Criteria 2.1, 2.2 (Legal form and modalities of conducting business) Foundation Law Article 2, 1.1 (Temporary authorisation by the AR to accredit study programs).
3.3	Criteria 1 (The degree program-specific definition of quality; the principles of the review method derived from this, the agency's understanding of its task) Foundation Law Article 2, 1.1 and § 9 (Temporary authorisation by the AR to accredit study programs, accreditation of agencies who perform study programme accreditations).
3.4	Criteria 5 (Equipment sustainability).
3.5	Criteria 1 (The degree program-specific definition of quality; the principles of the review method derived from this, the agency's understanding of its task).
3.6	Criteria 2.12 (Autonomy of the agency), Criteria 2.13 (Personal independence of decision-making bodies), Criteria 16.2 (Impartiality of experts, fairness of the process).
3.7	Criteria Part II (Content-related quality elements of programme accreditation); Criteria 2.9 (Stakeholder representation in decision-making bodies), Criteria 3 (Procedural organisation of the agency), Criteria 4 (Accountability), Criteria 15 (Acquisition), Criteria 16 (Organisation of the accreditation process), Criteria 18.1 (Compliance with conditions).
3.8	Criteria 1.1 (Development of definition of quality related to the degree program), Criteria 4 (Accountability), Criteria 6 (Internal quality management), Criteria 17.2 (Decisions and reasons for the decision, correct and integer use of the seal of the AR) Criteria 19.1 (Internal appeals process: process for internal checking of accreditation decisions), Foundation Law Article 2, 1 (regular external assessment of the agency).

During its re-accreditation process, ACQUIN carried out a critical analysis of its own mission and objectives including all of its documents and procedures. As a direct result of this review, ACQUIN published the internal quality management system on its website to increase the transparency of its work.

During the review the peer panel interviewed members of the Board as well as the managing director and, in separate discussions, the staff members. The peers also participated in a meeting of the Accreditation Commission to audit the final decision-making processes.

Furthermore, the head office of the Accreditation Council monitored two completed accreditation procedures on the basis of the accreditation procedure documentations (e.g. correspondence with the peers, HEI and SEC, procedure of peer selection and appointment, preparation of the peer report, statements of the HEI and the Standing Expert Committee (SEC), final accreditation decision). Finally, a member of the AR's head office also attended the General Assembly of ACQUIN in March 2006.

After the external review, there was an additional meeting with the Accreditation Council in May 2006 with the chair and the managing director of ACQUIN.

The following observations are offered on ACQUIN's compliance with the ESG that apply to EQA (Parts 2 and 3):

European standards for external quality assurance agencies (Part 2)

2.1 Use of internal quality assurance procedures

In the external quality assurance processes of ACQUIN the assessment of internal quality assurance processes of study programs are also included. In ACQUIN's guidelines for external quality assurance internal QA policies, processes, systems and procedures are therefore covered.

2.2 Development of external quality assurance processes

ACQUIN has developed external quality assurance processes in which all relevant stakeholders are involved. In the ACQUIN guidelines, the processes for external quality assurance processes are clearly described. The guidelines are published on the website. In the external review the panel members recommended that students as stakeholders should be represented not only in the peer groups but also in the SECs.

2.3 Criteria for decisions

Criteria for decisions are clearly formulated in the guidelines of ACQUIN which include the relevant legal requirements of the Accreditation Council (e.g. Criteria for Accreditation of Degree Programmes) and the KMK.

2.4 Process fit for purpose

ACQUIN's accreditation procedures are suitable for all different types of subjects, study programme profiles and higher education institutions. Each study programme is assessed against its own defined objectives, profile and performance. The internal structures and the quality assurance processes of ACQUIN have been shown to be "fit for purpose".

2.5 Reporting

After completion of the accreditation procedure, positive accreditation decisions are published (including a brief summary of the peer report and the names of the peers) on ACQUIN's website and the website of the Accreditation Council.

2.6 Follow-up procedures

ACQUIN has developed follow-up procedures in such cases where study programmes have been accredited with conditions or there was a deferral of the accreditation decision of the study programme.

2.7 Periodic reviews

The Accreditation Council requires each study programme and each accreditation institution in Germany to undergo a re-accreditation procedure every five to seven years.

2.8 System-wide analysis

As a registered non-profit association, ACQUIN reports on its work at least once a year to its members. The discussion of the annual report, which takes place at the association's General Assembly, allows a joint review of the association's work.

European standards for external quality assurance agencies (Part 3)

3.1 Use of external quality assurance procedures for higher education

The analysis of ACQUIN's self-evaluation report indicates that ACQUIN broadly complies with the requirements of the ENQA standard 3.1. ACQUIN behaves in a manner which is consistent with the relevant guidelines in this Part.

3.2 Official Status

The Accreditation, Certification and Quality Assurance Institute (ACQUIN) was founded on 26 January 2001 as a non-profit independent association. It was accredited in 2001 and re-accredited in 2006 by the Accreditation Council. Therefore, officially it has the right through delegated authority to award the seal of the Accreditation Council.

3.3 Activities

ACQUIN undertakes on a regular basis external quality assurance activities.

3.4 Resources

The expert panel concluded that the resources of ACQUIN are appropriate, with well qualified and highly motivated staff in the head office and sufficient financial resources. The expert panel was also aware that with its status of a non-profit association ACQUIN is not allowed to have a high capital surplus.

3.5 Mission Statement

The expert panel found that ACQUIN has a profiled mission statement. ACQUIN's mission is to apply independent, objective and quality-oriented accreditation procedures in order to safeguard the quality processes in higher education, guarantee transparency, promote innovation and ensure that a diverse range of courses is offered.

3.6 Independence

ACQUIN is an autonomous, self-governing association that is neither influenced by the State nor by lobbyists. Its decisions are not influenced by third parties as the structure of ACQUIN ensures an independent decision-making process.

3.7 External quality assurance criteria and processes used by the agencies

The processes, criteria and procedures used by ACQUIN are clearly defined and publicly available on its website and in printed form. The expert panel found that it has well defined and valid processes. However, it noted that their open structure placed a high demand on communication for all persons involved.

3.8 Accountability procedures

All relevant processes including the policy of ACQUIN are described in its brochure. Through the self-evaluation and the external review, it realised that some of its internal processes required clearer communication to the public.

AUQA AND THE EUROPEAN STANDARDS AND GUIDELINES

In 2006 AUQA was externally reviewed in order to determine if it was being effective in its role as a national quality agency for Australian higher education. The panel was tasked to evaluate AUQA's performance and suggest improvements with regard to the achievement of its objectives and vision, and to determine compliance with the *INQAAHE⁶ Guidelines of Good Practice (GGP)*. The composition of the five-member external panel was:

- Dr Stephen Jackson, Director of Reviews, Quality Assurance Agency (QAA), United Kingdom (Chair)
- Dr Mala Singh, Executive Director, Higher Education Quality Committee of the Council on Higher Education in South Africa (Deputy Chair)
- Mr Ken Smith, Director General, Department of Education and the Arts in Queensland

- Professor Gerard Sutton, Vice-Chancellor of the University of Wollongong (and President of the Australian Vice-Chancellors’ Committee)
- Mr Peter Hendy, Chief Executive, Australian Chamber of Commerce and Industry.

In contrast to the two European benchmarking partners, AUQA was not formally reviewed against the ESG requirements. Therefore, to facilitate comparability, the GGP were “mapped” onto the ESG. Table 2: INQAAHE GGP Mapped onto ESG, below, illustrates the strong correlation between both sets of standards.

Table 2: INQAAHE GGP Mapped onto ESG

No	INQAAHE Guidelines for Good Practice for EQAs	Relevant European Standards & Guidelines (Parts 2 and 3)
1.	The objectives of the agency	2.2, 2.4, 3.5
2.	The relationship between the EQA and the higher education institutions	2.1, 3.3
3.	Decision making	2.3
4.	The external committee	3.1, 3.7
5.	The public face	2.8, 3.2, 3.5, 3.6, 3.8
6.	Documentation	2.5
7.	Resources	3.4
8.	System of appeal	3.8
9.	Quality assurance of the EQA agency	2.4, 2.5, 2.6, 2.7, 3.1, 3.7, 3.8
10.	Collaboration with other agencies	n/a to the INQAAHE GGP
11.	Transnational Higher Education	n/a, but see comment at 3.2 below

In order to provide a common point of comparison across all three agencies, as part of the benchmarking project AUQA undertook to reference its external review findings against the ESG standards that apply to EQA. The results of this mapping are summarised below. (Parts 2 and 3):

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

2.1 Use of internal quality assurance procedures

AUQA audits of institutions cover all internal QA policies, procedures, systems and processes. Its focus on internal quality assurance processes therefore satisfies the requirements for ESG standard 2.1.

2.2 Development of external quality assurance processes

When AUQA was established in 2000 it had four objectives. These, along with the AUQA Audit Manual (which describes the procedures to be used) were published on its website prior to the first audit in 2002. The external review panel made several Recommendations to review and revise AUQA’s objectives 3 and 4 in preparation for its second cycle of audits. For the second cycle, the review panel suggested also that AUQA put a greater emphasis on the enhancement function of quality audit. The panel was also of the opinion that AUQA’s international profile should be strengthened with the inclusion of a “new objective”, namely to:

Develop partnerships with other quality agencies in relation to matters directly relating to quality assurance and audit, to facilitate efficient cross-border quality assurance processes and international transfer of knowledge about those processes (new AUQA Objective number 4).

AUQA's participation in this international benchmarking project is in itself evidence of increasing activity in this area.

2.3 Criteria for decisions

AUQA audits Australian universities against their own mission, vision and objectives, and against the statutory requirements of their Act, and any enabling legislative requirements. AUQA also audits entities against any other relevant external criteria. In the second cycle, greater emphasis will be given to auditing of entities against external reference points and to investigating the setting of standards and the achievement of appropriate learning outcomes by the auditees' students.

2.4 Processes fit for purpose

AUQA has adopted a "fitness-for-purpose" approach to quality assurance (QA), for both internal and external QA processes. The review panel commended AUQA for successfully establishing a credible peer review approach and the fitness-for-purpose model for quality audits in the first cycle. One of the Recommendations of the AUQA external review was to reconsider the skills mix of AUQA audit directors and audit panel members to adequately address increasing levels of financial, legal and international higher education complexities.

AUQA therefore satisfies the requirements for ESG standard 2.4.

2.5 Reporting

AUQA audit reports are all published and available on the AUQA website. One of the Recommendations of the AUQA external review was that AUQA should continue to consider additional strategies that will further minimise the time lag in producing the audit reports, between audit site visit and publication. AUQA has also adopted a new audit report production target of two months from the date of the site visit to the date of the definitive draft of the audit report going back to the auditee.

2.6 Follow-up procedures

AUQA has established follow-up procedures after the review (originally there was an action plan and a follow-up report, but in 2003 this was replaced with a Progress Report which is made public on the auditee's website with a link to the AUQA website). One of the Recommendations of the external review was to review the strategy for monitoring and reporting on the implementation of Recommendations and Affirmations following the submission of the Progress Report.

2.7 Periodic reviews

AUQA currently audits approximately 50 entities in a five-year audit cycle, meaning about 10 whole-of-institution/organisation audits are performed each year.

2.8 System-wide analyses

AUQA has produced three such analyses during the first cycle so far (2002–2006). One of the Affirmations of the external review was to prepare reports on selected countries annually and report on the quality assurance systems in place and the audit findings in relation to these countries.

European standards for external quality assurance agencies (Part 3)

3.1 Use of external quality assurance procedures for higher education

Analysis of AUQA's self-description, available in Part 2 (see above) indicates that AUQA broadly complies with the requirements of the ESG standard for Section 3.1, and that AUQA generally behaves in a manner which is consistent with the relevant guidelines for that section.

3.2 Official status

As the only non-European agency in the benchmarking project, Section 3.2 is problematic for AUQA, in that it states:

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 jurisdiction within which they operate.

AUQA was established in May 2000 by the MCEETYA as a not-for-profit company, limited by guarantee of, and majority funded by, the Members (*ex officio* the nine federal, state and territory ministers with responsibility for higher education).

As such, AUQA is recognised as a national legal entity within the Commonwealth of Australia, but that is not part of the European Higher Education Area. Therefore, though AUQA does not (and cannot) *formally* comply with the letter of the ENQA standard for Section 3.2 it would comply if the same standard was applied in the area of Australian legislative jurisdiction. In this respect, AUQA certainly complies with the spirit of Section 3.2 of the ESG.

3.3 Activities

AUQA undertakes regular external quality assurance activities at the institutional level (including sampling at the programme level) and therefore complies with the ESG standard for Section 3.3, and behaves in a manner consistent with the relevant guidelines.

3.4 Resources

AUQA has adequate and proportional resources, human and financial. The higher education sector's general perception of AUQA staff was that they were highly efficient and professional. The review panel confirmed these perceptions. The staff demonstrated allegiance to the organisation. The staff is working to full capacity.

3.5 Mission statement

AUQA's Mission Statement, which is publicly available on its website, emphasises the notion of audit for quality improvement (rather than compliance or an accreditation focus):

By means of quality audits of universities and accrediting agencies, and otherwise, AUQA will provide public assurance of the quality of Australia's universities and other institutions of higher education, and will assist in improving the academic quality of these institutions.

However, two of the external review's Recommendations were to:

- ensure regular reviews to revise AUQA's Mission, Vision and Values to adequately reflect changing educational contexts, and
- establish a periodic strategic planning process that prepares AUQA for ongoing changes in the higher education policy, funding, and regulatory environment.

3.6 Independence

AUQA is an independent company limited by guarantee. However, the governance arrangements adopted for AUQA mean that the interests of both the Members and the educational institutions are reflected in the membership of the AUQA Board. The external review commended AUQA for successfully establishing a credible peer review approach and the fitness for purpose model for quality audits in Cycle 1.

3.7 External QA criteria and processes used by the agencies

The QA processes, criteria and procedures used by AUQA are all clearly documented and publicly available in the AUQA Audit Manual, which is available on the AUQA website. In its report, the panel made the following observation:

...the review panel considered that AUQA utilises a number of strategies in pursuit of consistency in the quality audit process...⁷

The panel then enumerated seven strategies that were already in operation, and observed that “with any sampling strategy a certain level of variation is inevitable”.⁸

However, the external review made the following two Recommendations, viz:

- (a) employ further strategies to minimise possible or perceived inconsistencies in judgements of audit panels, including review of selection processes and training of auditors as well as additional moderation strategies
- (b) look at ways in which student participation can be increased in the review process of higher education institutions.

These issues will be addressed as AUQA prepares for its Cycle 2 audits.

3.8 Accountability procedures

There are many separate documents available on the AUQA website which, if taken together, cover the assurance of the quality of the agency itself. AUQA has a number of procedures for its own accountability in place, but these are not necessarily in a form that is fully consistent with the descriptors of the relevant ESG guideline. On balance, AUQA considers that it complies with the intent of the ESG standard for 3.8, if not with the letter of the statements in the relevant guideline.

CONCLUSIONS

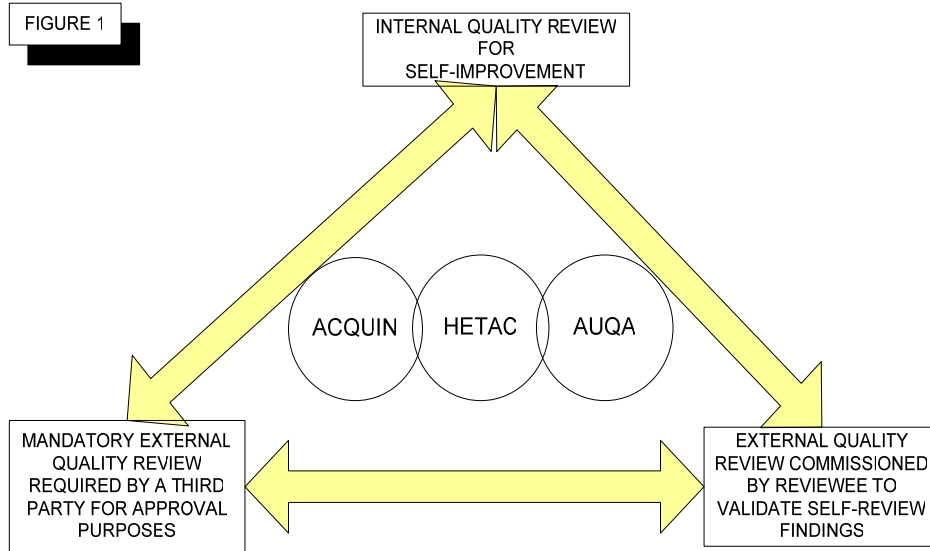
As noted earlier, AUQA differs significantly from both ACQUIN and HETAC in that it performs fitness-for-purpose quality audits at the whole-of-institution / organisation level, and it is not involved in programme or institutional-level accreditations, as Australian universities enjoy “self-accrediting institution” status. All German universities’ programmes are subject to accreditation by external accreditation, certification and evaluation bodies, such as ACQUIN. HETAC also performs programme-level accreditations. In addition, HETAC has a brief to evaluate the quality assurance processes for new providers, prior to the accreditation of programmes. However, the Irish universities are governed by the *Universities Act 1997* and, accordingly, their quality assurance arrangements are performed under different auspice. AUQA is also responsible to MCEETYA for the quality auditing of the accreditation agencies of the Australian Commonwealth, states and territory governments and, as already noted, in the German context this makes AUQA more akin to AR than to ACQUIN.

AUQA also differed markedly from its two European benchmarking partners in this exercise, in that it was able to *initiate* its own self-review and it *commissioned* an external review as a commitment to good practice in QA, rather than having to have a review performed because it was formally required by some official arm of government. AUQA was also able to subject itself to virtually the identical quality review process that it uses in its own audits of universities, to which it then volunteered to undertake an evaluation against the *INQAAHE Guidelines of Good Practice*, adding another dimension of external reference for the quality evaluation process.

ACQUIN on the other hand was formally *required* to undergo a review by AR, and to follow an accreditation agency approval programme developed, approved and implemented by AR, which included evaluation against the ENQA standards. HETAC was somewhere in-between: like ACQUIN, it was formally *required* to undergo an external review, but (similar

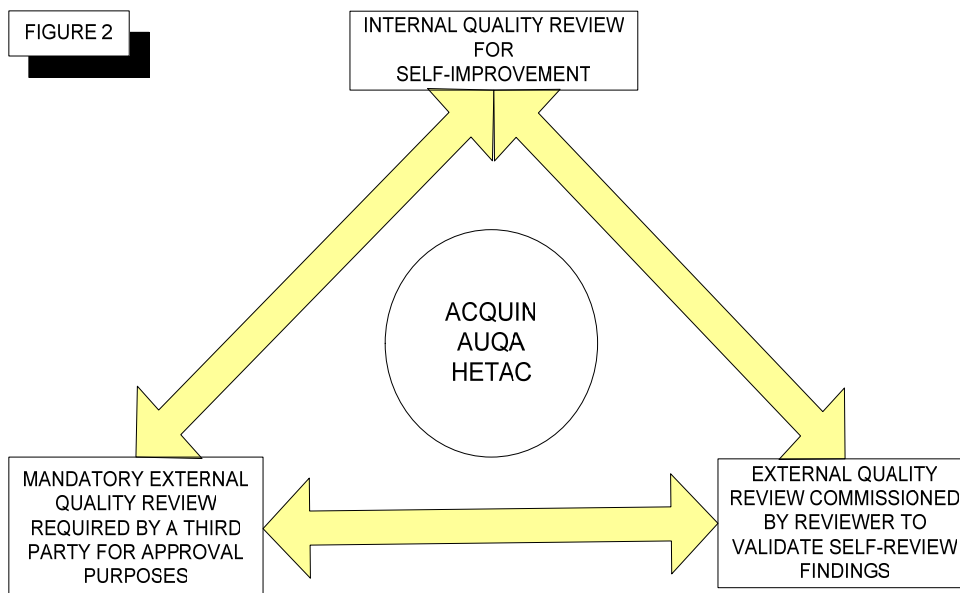
to AUQA) HETAC chose to evaluate itself (and be externally reviewed) against the ENQA standards and guidelines. These differences in the EQA review drivers are plotted in Figure 1 below:

Figure 1: Drivers of the quality reviews of the three EQAs



The findings of the three external reviews therefore differed considerably in terms of the consequences for the agency concerned, from the possible loss of formal recognition as a recognised accrediting body, through to the acknowledgement of organisational strengths and opportunities for improvement by peers. Notwithstanding this range of possible outcomes, and allowing for the differences in national contexts, all three EQAs' quality practices are guided by virtually interchangeable quality principles. They share similar values and have developed similar mission statements and therefore, not surprisingly, the elements of the quality review processes, practices, and methodologies they all employ are similar. For example, all three EQAs have adopted a self-assessment led review process, followed by an expert peer review process to validate the results of the self-assessment. Figure 2 (below) illustrates the essential similarity of the three agencies in their quality reviews of institutions, programs, and/or processes.

Figure 2: Drivers of quality reviews performed by the three EQAs:



Finally, all three EQAs agreed to swap their self-evaluations of compliance against the European Standards and Guidelines, to provide a common benchmark for the purpose of making comparisons.

As the mapping against the ESG in this study indicates, the similarities in approach to quality review are sufficient for all three agencies to fundamentally satisfy the requirements of the ESG, despite the different national contexts and traditions, and educational systems.

The major positive findings of the external reviews for the three agencies are very similar, in that they acknowledge that each agency is successfully achieving its primary purpose. Specifically, the external panels noted the following in respect of each EQA:

- (a) The HETAC external review panel found that it “is satisfied that in the performance of (its principal statutory) functions, HETAC complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area.”⁹
- (b) The Accreditation Council found that ACQUIN “has shown, in the course of an accreditation procedure, its general institutional operability and suitability for the purpose regarding the task of study programme accreditation. The procedures for the accreditation of study programmes follow both the content-related quality standards (check-field 7 to 14) and the procedure-related quality standards (check-fields 15 to 20) of the ‘Criteria for the Accreditation of Accreditation Agencies’ specified by the Accreditation Council.” The Accreditation Council also stated that ACQUIN complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area.¹⁰
- (c) The AUQA external review panel commended AUQA for “generally meeting the requirements of the *INQAAHE Guidelines of Good Practice*.”¹¹

Notwithstanding the positive thrust of the findings, the panels identified the following areas requiring specific attention as the EQAs move forward:

- (a) In the case of HETAC, the panel advised that urgent attention be given to the provision of initial and ongoing training to its reviewers, including the requirement that no-one should normally be a member of a review team unless they have undergone such training. Linked to this, it recommended that HETAC review the qualifications, experience and expertise required of its reviewers, with the aim of enabling HETAC to take a more strategic as opposed to what appears currently to be a rather pragmatic approach to their selection and deployment.

The panel also recommended that HETAC review the longer-term sustainability of the level and quality of support currently given by staff considering individual programmes submitted for validation and consider how its current approach to validation might be varied, especially where a new programme, or a programme at a level not previously offered by a provider, is involved. Finally, it recommended that HETAC consider publishing all its reports as a matter of principle, and publicising its intention in this regard.

- (b) In the case of ACQUIN, the panel however recommended improvements to some processes through a more systematic and stronger formalisation (e.g. nomination of SEC members only for a special term, nomination of chairpersons of peer groups in advance). The experts mentioned also that through the fitness of purpose approach there might be the danger that binding regulations concerning higher education are not considered adequately and ACQUIN should give more attention to this point. For ensuring also the involvement of students in the nomination of student peers, students should be also represented in the SECs.

The panel also recommended that the internal quality processes of ACQUIN, which currently relies to a high level on quality-oriented motivation and communication of all involved persons should be placed on a stronger formal structure.

- (c) The AUQA external review panel recommended that additional strategies be investigated by AUQA to minimise time lag between the audits and the publication of reports; minimise perceived inconsistencies between reports; and to improve auditee follow-up of audit findings.

Each agency is now in the process of incorporating the recommendations of the external review panels into their operations. In the case of HETAC, it is responding to the question of enhancing the training of its panel members, while AUQA is now revising its vision, mission, and objectives statements as part of planning for its second cycle of institutional audits, taking on board the comments and reflections of the external panel. Finally, ACQUIN is now developing a stronger formalisation of its internal quality management system and building up structures for a better separation of the different working areas.

CHAPTER 3: What did we learn?

This Chapter reflects on the process adopted by the three agencies in this project. It also conducts a review of literature on the issues associated with the process of quality assurance benchmarking and concludes that there are risks of a “compliance mentality” as EQAs submit themselves for external reviews. The authors advocate the continuous monitoring of standards such as the ESG and GGP to ensure continued good practice in this area. They also conclude that comparative exercises such as this also assist in the promotion of understanding between agencies.

...ENQA considers it a high priority to proceed now to give special emphasis to the internal quality assurance practices. Accordingly, ENQA has set up a working group of its members to draft a strong code of principles for internal quality assurance of agencies, including as an important element the obligatory external evaluation of these. In practice, this will mean that present and future ENQA members will ‘take their own medicine’ and subject themselves to external quality assurance and evaluation.¹²

The starting point for this exercise was three quite distinct EQA’s taking “their own medicine”. However, the drivers triggering the reviews varied on the one hand from compliance with legislation (as in the case of HETAC) to one of strategic review (as in the case of AUQA). Critically, all EQAs opened the “black box”¹³ for public viewing and consumption. It also afforded those subject to the rigorous evaluations by the EQAs an opportunity to comment and evaluate the performance of the EQAs in these areas.

The key to the black box in this instance is availability of internationally accepted standards. The EQAs were conscious of the risks associated with this, but resolved the potential difficulties which enabled the conduct of this exercise. The overriding risk is perhaps one of comparability of standards. Different networks may wish to promote different standards or, more fundamentally, the origins of standards may reflect the stages of maturity of the member organisations of the network. This theme was explored by Guy Aelterman¹⁴ whose analysis highlights some differences between the INQAAHE Guidelines and ESG. These include:

- (a) a dedicated reference to documentation is contained within the INQAAHE GGP, while this issue is woven through the various standards within the ESG
- (b) the promotion of collaboration with other agencies is referred to specifically by INQAAHE with no specific reference in the ESG
- (c) the official status of EQAs is sought within the ESG while there is no such reference in the INQAAHE GGP.

These did not present insurmountable obstacles. Chapter 2 provides sufficient evidence of the capacity of the three partners to identify sufficient common ground which made it possible to “knit” these standards and guidelines together and facilitate a truly international benchmarking exercise. This bears out the conclusion of Aelterman “...that there is considerable transparency and comparability between the codes of the major international network of quality assurance agencies”.¹⁵ In this manner, it is possible to use standards and guidelines developed for different constituencies as a tool to increase understanding of EQAs and processes which ultimately promotes understanding of different higher education systems across the globe. It is noteworthy that the similarity in membership in both networks also contributes to maximising the closeness of the standards, in effect reflecting the global dimension of higher education. This also supports the view that the elaboration by different networks of detailed procedural standards could hinder the capacity to promote this dialogue between agencies.

However, this project has gone further than to focus on only the “procedural”. The organisational development, the operating environments and the respective approaches in fulfilment of their missions are reviewed, with some common points of reference identified.

In this respect, this project has been more than evaluating the comparability or usefulness of different standards. The authors were anxious to acknowledge that standards, irrespective of their origin, merely serve as a tool or enabler. When viewed from the standpoint of continuous improvement, determination of compliance with standards only reflects the position of the organisation at that particular moment in time. EQAs must strive to embed and promote quality improvement at all times. Harvey noted, however, that:

...if quality monitoring is seen as an event rather than a process, there is little likelihood of the event making much long-term impact. Rather, it is likely to lead to performance and game playing. The more the process is one of complying with external requirements, the less the lasting internal benefits.¹⁶

Readers may wish to reflect on whether the evidence derived from their own experience of external evaluation processes supports this proposition.

In many ways, this observation mirrors some of the risks which have been voiced over the ESG and the associated development on the European Register. Ministers with responsibility for Higher Education reviewed progress on the ESG at the meeting on May 2007 in London. They stated:

We welcome the establishment of a register by the E4 group, working in partnership, based on their proposed operational model. The register will be voluntary, self-financing, independent and transparent. Applications for inclusion on the register should be evaluated on the basis of substantial compliance with the ESG, evidenced through an independent review process endorsed by national authorities, where this endorsement is required by those authorities.¹⁷

While the over-riding objective of the register is to provide information about “trustworthy quality assurance agencies”¹⁸, it runs the risk of embedding the compliance mentality in these very agencies. The desire for inclusion on the register causes the EQA to become skilled in writing the “right things” in their self-evaluation report rather than genuinely embedding the quality culture. Again, Stensaker noted this trend as “...the external stimuli offered have mainly led to a compliance culture”.¹⁹ In response to this risk, it would be a fair reflection that each of the three EQAs pursued the external evaluation in the context of organisation reviews rather than the desire to be on the proposed European Register. Certainly, this is not the case for AUQA! Its review was triggered to maintain currency and relevance in a changing environment, and to enhance its credibility in the eyes of the organisations it audits. In the case of HETAC, the ESG formed the benchmark for its evaluation which was driven by a review prescribed by legislation. ACQUIN’s decision to pursue an external evaluation was driven by a strategic review of its operations, combined with the increased emphasis in the promotion of quality culture in German higher education institutions.

Is there a value in conducting these international benchmarking exercises? The authors would respond positively to this. Harvey²⁰ has documented a previous attempt to develop a world quality register, to provide assurance of the standing and reputation of quality assurance agencies. However, notwithstanding support from organisations such as the International Association of University Presidents and UNESCO, the proposal did not garner sufficient support and ultimately, it led to the development of the INQAAHE GGP approved in Dublin 2003. Stensaker has noted that “more information than ever before is published about higher education and its outcomes, and external quality monitoring systems are the main driver behind this arrangement.”²¹ Projects such as this add to this wealth of information, using two distinct benchmarks such as the ESG and GGP to develop a coherent set of common points to facilitate a comparative exercise. The methodology used, the sharing of files and experiences underpinned the open nature of the project and, as such, it offers insight to other agencies embarking on similar paths. All three agencies emerged from the exercise with their reputations enhanced and, ultimately, their clients and other stakeholders will benefit from this. However, of its own, it may not be enough for the final

consumers of their services — the students. It may be necessary to complement such projects with other tools, such as national frameworks for qualifications.

All three participating agencies embarked on this project intent on sharing experiences and offering insight to other agencies starting on similar paths. While the details of the experiences and other learning points are evident within this Report, one key message for all is that quality assurance is a journey and, as such, it is continuous. However, those advocating and articulating the standards as a means to confirm the status of agencies, must also maintain vigilance and ensure that the standards themselves are continually modified to reflect the ever-changing landscape in higher education. While we all may subscribe to the standards movement, we must maintain the focus on embedding the notion of continuous improvement in EQAs. Stefanie Hofmann remarked, “A simple phenomenon raises a large number of questions. And we need to be careful — sometimes, we cannot see the forest for the trees...”²² Once the standards cease to raise questions, custodians of quality improvement must be prepared to question their value. We must work hard to ensure their continued relevance to higher education.

Just as in the classic Socratic dialogue, which involves both an internal and an external examination of knowledge to arrive at the truth (“know thyself”, “the unexamined life is not worth living”, etc.), so too it is in quality assurance. As noted in **Chapter 2**, pure self-assessment, no matter how detailed and well executed, is always only a self-referencing activity and as such external validation adds value to such exercises. This benchmarking project provided the three participating EQAs with an opportunity to externally reference their own reviews against those of peer organisations in order to learn about organisational change from an international perspective. And what was the major challenge for the three agencies here? As was eloquently put, again in the words of Stefanie Hofmann: “To carry out change it is necessary — though not in itself sufficient — to make good decisions. What is decisive in the final analysis is to implement these decisions successfully.”²³

For this reason alone, international standards such as those produced by ENQA and INQAAHE must be monitored and continually maintained in accordance with accepted good practice as it changes, and in this context it is noted by the authors that INQAAHE recently issued a revised set of their *Guidelines of Good Practice*. This is necessary if External Quality Assurance agencies are to learn from each other by benchmarking themselves against contemporary good practice standards.

List of Acronyms

ACQUIN	Accreditation, Certification and Quality Assurance Institute
AR	German Accreditation Council
AUQA	Australian Universities Quality Agency
DEST	Australian Government Department of Education, Science and Training
ENQA	European Association for Quality Assurance in Higher Education
ESG	European Standards and Guidelines
EQA(s)	External Quality Agency (or Agencies)
FETAC	Further Education and Training Awards Council
GGP	<i>INQAAHE Guidelines of Good Practice</i>
HE	Higher Education
HEA	Higher Education Authority (Ireland)
HEI(s)	Higher Education Institution(s)
HRK	German Rectors' Conference
HESA (2003)	<i>Higher Education Support Act (2003)</i>
HETAC	Higher Education and Training Awards Council
IHEQN	Irish Higher Education Quality Network
INQAAHE	International Network for Quality Assurance in Higher Education
IoTs	Institutes of Technology
IUQB	Irish Universities Quality Board
KMK	Standing Conference of the Ministers of Education and Cultural Affairs
MCEETYA	Ministerial Council on Employment, Education, Training and Youth Affairs
NSAI(s)	Non Self-Accrediting Institution(s)
NQAI	National Qualifications Authority of Ireland
OECD	Organisation for Economic Co-operation and Development
QA	Quality Assurance
QAA	Quality Assurance Agency for Higher Education
SAI(s)	Self-Accrediting Institution(s)
SEC	Standing Expert Committee
STAA(s)	state and territory accreditation agency(s)

APPENDIX A ORGANISATION DESCRIPTION

ORGANISATION

HETAC

Legislative context (foundation Acts of Parliament)

The Higher Education and Training Awards Council (HETAC) was established in June 2001 under the *Qualifications (Education and Training) Acts 1999 and 2006*. It was one of the three bodies established under the Act. The National Qualifications Authority of Ireland (more commonly referred to as the Qualifications Authority) has responsibility for developing the National Framework of Qualifications and for determining procedures for the Awards Councils. It also acts as a conduit for State funding of their activities. A sister Awards Council — the Further Education and Training Awards Council (FETAC) — is responsible for setting standards, making awards and assuring quality in the further education and training sector.

Establishment criteria

HETAC is a State body with a statutorily prescribed relationship with the Institutes of Technology (IoTs) in the areas of awards and quality assurance. On the other hand, the private providers engage with HETAC on a voluntary basis as they see a strategic reason for securing HETAC accreditation for their programmes.

Degree of independence

While clearly aware of the role prescribed within the *Qualifications (Education and Training) Act 1999*, HETAC enjoys full independence in terms of the manner of executing these functions and the decisions it makes in fulfilling its mission. HETAC is also independent of the providers.

Board / Council Structure

The Act provides that the Council should consist of 15 members, only three of which are nominated by Ministers of the Government — two by the Minister for Education and Science, with a further one by the Minister for Enterprise, Trade and Employment. The full membership of the Council is as follows:

- (a) Chairperson of the Council
- (b) Chief Executive of the Council
- (c) Chief Executive of FETAC
- (d) Two persons nominated by the Minister of Education and Science
- (e) One person nominated by the Minister of Enterprise, Trade and Employment;
- (f) Three persons from recognised institutions
- (g) One person representative of learners
- (h) One person representative of employees of recognised institutions
- (i) One person nominated by the Irish Business and Employers Confederation
- (j) One person nominated by the Irish Congress of Trade Unions
- (k) Two persons who in the opinion of the Council have special knowledge and expertise in areas of relevance to the Council.

Representation of stakeholder interests

HETAC works closely with all those involved directly in higher education and training, both in Ireland and abroad. However, this occurs most frequently in the elaboration and consultation processes in the development of policies, criteria and processes that may also have implications for higher education and training. Evidence of this close partnership includes:

- (a) Working closely with industry and the professions and requires their expertise to ensure that all programmes are relevant to the workplace, society and that they keep pace with technological developments.

- (b) Drawing on the expertise available in the Universities, IoTs and other higher education institutions and bodies to help devise standards for specific qualifications and for programme accreditation.
- (c) Engaging international expertise and those who are in a position to make national and international comparisons in higher education in all quality assurance and accreditation processes.

Relationship with other national peer agencies

The *Institute of Technology Act 2006* removed the IoTs from a direct relationship in terms of financial and activity accountability with the Department of Education and Science and placed them within the remit of the Higher Education Authority (HEA). This entity is the statutory planning and development body for higher education and research in Ireland. It is also one of the main advisory bodies for the Minister for Education and Science on the delivery of higher education as well as being the funding authority for higher education.

As previously noted, the universities are outside the remit of HETAC and their quality assurance processes are managed by the Irish Universities Quality Board (IUQB) which was established by the seven Irish universities in 2003.

The IUQB collaborates with HETAC through the Irish Higher Education Quality Network (IHEQN). Some of the issues facing the two agencies are similar. With major review cycles completed, HETAC and the IUQB share a growing emphasis on enhancing the capacity of the Irish higher education system to engage in quality improvement.

Subcommittee structure (if any)

Under Section 56 of the *Qualifications (Education and Training) Act 1999*, HETAC may establish committees to advise on matters of concern at any particular time. The legislation also provides that HETAC may delegate certain functions to a committee, including such functions as they may relate to a particular activity of business, education or training.

The new Council has established an Academic Committee whose composition reflects stakeholder interests. The Committee will exercise its functions on behalf of, and with the full authority of, the Council. Decisions of the committee will not be subject to ratification by the Council.

The functions of the committee are to:

- (a) determine standards of Council awards
- (b) accredit programmes of higher education and training
- (c) accredit research degree programmes, through individual case registration, approval of fields of learning, and accreditation to maintain a register
- (d) recognise professional awards for alignment with the National Framework of Qualifications
- (e) approve amendments to the orders in council for programmes delegated to institutions
- (f) re-accredit programmes on foot of programmatic reviews
- (g) approve reports of institutional reviews
- (h) monitor the implementation of recommendations of review panels
- (i) oversee the selection and training of reviewers
- (j) oversee the direct awarding function
- (k) approve guidelines for academic quality enhancement
- (l) advise the Council on matters of academic policy and procedures
- (m) take on any other function delegated by the Council from time to time.

Operating environment — competitive or sole supplier of service in a national context

The *Qualifications (Education and Training) Act 1999* has prescribed the relationship between the IoTs and HETAC and, as such, HETAC is the sole supplier of these services. For example, it would not be legally possible for them to seek these services from the IUQB or, indeed, any other agencies within Europe. However, the situation is somewhat different with

private providers. It is possible for them to offer degrees accredited by universities in the UK and professional associations. It is estimated that there are approximately 18 degree level programmes accredited by foreign universities. In this respect, HETAC is operating within a competitive environment. However, with the establishment of the National Framework for Qualifications, providers in Ireland are increasingly anxious to “map” or place their qualifications onto the framework and this is becoming less of an issue.

ACQUIN

Legislative Base

After the implementation of the accreditation system in Germany with the German Accreditation Council (AR), the first agencies for the accreditation of study programmes were established. In May 2000, the Bavarian Rectors’ Conference passed a resolution to take the initiative to establish an accreditation agency with responsibility to accredit all types of programmes and disciplines in all of its higher education institutions. This builds on discussions in other Rectors’ Conferences of several German *Laender* (Baden-Wuerttemberg, Bavaria, Saxony and Thuringia) as well as Austria which along with HEI representatives were discussing the structure, philosophy, principles and working methods of such an agency. The Accreditation, Certification and Quality Assurance Institute (ACQUIN) was founded on 26 January 2001. It was subsequently accredited by the AR later that year.

Establishment Criteria

ACQUIN was founded as a self-governing organisation for HEIs with the legal status of a registered, non-profit association. On 5 March 2001, ACQUIN was registered as an association in the Register of Associations of Bayreuth local district court. Since then, some 130 higher education institutions have become members of ACQUIN located in Germany, Austria, Switzerland, Hungary and the USA. In addition to the close links to academia, ACQUIN also has links with specific academic societies and professional associations. It carries out accreditation procedures at member and non-member institutions.

Board / Council Structure

ACQUIN is organised principally on the basis of a Board, a General Assembly and an Accreditation Commission. Further committees are the Standing Expert Committees and the peer groups.

The Board is responsible for the appointment of the head office staff, including the nomination of the managing director, budgetary planning matters and membership issues, in addition to agreements with other quality assurance institutions

Board

The Board is elected by the General Assembly for a period of three years. Members are drawn from the universities and universities of applied sciences (two representatives each) as well as a single representative of the professional practice.

General Assembly

The General Assembly meets once a year and is responsible for the election of members to both the Board and Accreditation Commission. It also decides on budget decisions and statutory amendments, as well the promotion of debate on ACQUIN procedures.

The Accreditation Commission is solely the decision-making body of ACQUIN and members are elected by the General Assembly for a period of two years. It is composed of :

- (a) the original chairperson of the Board
- (b) four university and four university of applied sciences representatives
- (c) two representatives of professional practice, and
- (d) two student representatives.

Its main functions include:

- (a) Making accreditation decisions based on the reports submitted by the peer groups as well as the statements made by both the HEIs and the Standing Expert Committees
- (b) Deciding the assessment criteria and principles upon which procedures are based, taking into account the proposals made at the General Assembly
- (c) Establishment of guidelines for self-evaluation and for the assessment of degree programs
- (d) Discussion and determination of evaluation results
- (e) Deployment of the Standing Expert Committees and appointment of their members
- (f) Supervision of the peer nomination by the Standing Expert Committees.

The Accreditation Commission is not involved in the appointment of the peer groups. This ensures that objective decision-making is not hindered due to a pre-selection of the peers.

Subcommittee Structure

The procedures for establishing committees and the appointment of members are defined in ACQUIN's statutes and election regulations. The main subcommittee structures are the Standing Expert Committee (SEC) and peer groups.

(a) Standing Expert Committee (SEC)

The SEC is responsible for the appointment of the peer groups and ensuring the consistency of the assessment procedure and the accreditation recommendation submitted to the Accreditation Commission, which is achieved through the preparation of a statement on each evaluation. The work of the SEC is in discipline areas such as Mathematics and Natural Sciences, Informatics, Engineering, Humanities, Architecture, Medicine, Law, Social Sciences and Economics, Music, Art and Design.

Each SEC is composed of at least five representatives, including at least one member of each university type (university and university of applied sciences) and professional practice as well as student representatives.

(b) Peer Groups

A peer group is nominated according to the individual profile of the study programme by the Standard Expert Committee. It is composed of at least five members, including three professorial representatives, one representative of professional practice and one student representative.

The peer groups evaluate the degree programmes on the basis of the submitted self-report by the HEI and the information gathered by the on-site visit; reports on the strengths and weaknesses analysis of the degree programme as well as recommendations for its further development; and makes an appropriate recommendation to the Accreditation Commission.

The HEI will receive the peer report (without the accreditation recommendation of the peers) for a statement and they will have an opportunity to respond to this. The Standard Expert Committee either confirms the peer recommendation or revises it on the basis of the statement of the HEI as well as the peer report. For its decision the Accreditation Commission takes into account the peer report, the statement of the HEI, as well as the accreditation recommendation of the peers and the Standard Expert Committee.

Degree of Independence

ACQUIN is not influenced by the Governments of the *Laender* and is autonomous in the spirit of academic tradition. Its independence is underpinned by those participating in the decision-making process, including representatives of students and professional practice. The accreditation procedures are designed in such a way that neither the content nor the results may be predetermined by the applicants' general institutional set-up. The procedure applied and its findings are guided by the objectives set for the degree programmes in

question. Stakeholder groups (students, professional practice, employers as well as employees and representatives of the HEIs) are represented in all bodies of ACQUIN and therefore involved in the quality assurance process including the decision-making.

AUQA

Legislative Base

AUQA was established by the Ministerial Council on Employment, Education, Training and Youth Affairs (MCEETYA) in March 2000. MCEETYA is the group of ministers with portfolio responsibility in any of the areas of employment, education, training or youth affairs in the Australian Federal Government and states and territories.

Establishment Criteria

AUQA is an independent national agency that promotes, audits and reports on quality assurance in Australian higher education. Its establishment came about through the realisation at government level that Australia was one of the few countries in the world not to have established a national quality assurance body for higher education, coupled with the fact that Australia's universities enjoy self-accrediting status. Furthermore, its role has been further embedded in Australian higher education through reference in other legislation, including the *Higher Education Support Act (HESA)* to make quality audit a compulsory, formal requirement for all higher education providers in receipt of funds under the Fee-Help provisions of the Act, irrespective of whether they are self-accrediting or non self-accrediting. AUQA was also named as the quality agency for both self-accrediting and non self-accrediting institutions, although it was originally established to audit just self-accrediting institutions and state and territory accreditation agencies. It is also worth noting here that prior to the passing of HESA in 2003 auditees had submitted themselves on a voluntary basis to audit by AUQA since its establishment.

Degree of Independence

AUQA operates independently of government and the higher education sector under the direction of a Board of twelve directors.

Board / Council Structure

AUQA is a not-for-profit company limited by guarantee whose "members" are the nine ministers whose portfolios include higher education. AUQA receives core, operational funding from the Commonwealth, states and territories. The full composition of the AUQA Board is as follows:

- (a) Three directors nominated by the Commonwealth Government (one of whom must be the Chair)
- (b) Three directors nominated by the states and territories governments
- (c) Four directors nominated by the self-accrediting institutions
- (d) One director nominated by the non self-accrediting institutions
- (e) The Executive Director, appointed by the Board.

Membership of the Board is changed on a rolling schedule, with three years being the standard period of appointment of a director.

Relationship with other Peer Agencies

AUQA is the only national quality agency in the Australian higher education system that works both collaboratively with, and is required to audit, the higher education accreditation functions of the statutory authorities and departments of education in the states and territories.

Subcommittee Structure

AUQA being a relatively small organisation for a national quality assurance body, at the time of benchmarking the Board had only two subcommittees viz a Finance Committee and an "auditor vetting/approval" subcommittee. It has subsequently added an Editorial Board for AUQA publications.

RESOURCES and INFRASTRUCTURE

HETAC

In 2005, the income of HETAC amounted to €3.9 million, of which €2.6 million (or 66%) came in the form of aid from the State through the National Qualifications Authority of Ireland. The remaining income came primarily from fee income arising from validation and award processes. During this same period, expenditure amounted to €3.6 million, with €2.7 million (or 76%) going on general administration.

During this time, the average number of employees over the year was 33, which amounted to €1.9 million in salaries. In terms of staffing structures, there is a Chief Executive Officer, with two Directors (Academic and Corporate Affairs) directly responsible to this position. Below the Director of Academic Affairs, there are six academic positions (or registrars) responsible for policy development in specific aspects of HETAC's operations, such as research, quality assurance, programme accreditation. The remaining staff provide support to the delivery of functions across a range of HETAC's operations, including the processing of awards, support of academic services, IT and accounts functions, etc.

ACQUIN

ACQUIN has established a head office in Bayreuth with a managing director, a secretary and nine members of staff of which eight staff members are involved in accreditation procedures and one staff member responsible for the support of the bodies.

In 2005, the income of ACQUIN amounted to €996,994. Income accreditation procedures and membership fees accounted for 95% and 3% respectively, while the remainder came from other activity. Expenditure for the same period amounted to €867,504 of which 46% went on staff costs. The costs of on-site visits accounted for a further 41%, while general administration costs accounted for the remainder. ACQUIN does not receive any financial institutional subsidies from the government at either federal or *Laender* level or from any other institution.

AUQA

The source of income for AUQA is from contributions by each of the states and territories and the Commonwealth Government, and from audit fees and consulting. In 2005, this amounted to \$1,403,233. (Figures are in Australian Dollars).

The operating revenue from contributions received from the state and Commonwealth Governments was approximately \$935,500. Other revenue from ordinary activities (mainly audit fees) was approximately \$467,700. These revenues pay for the conduct of audits performed by AUQA and any associated quality enhancement activities.

At the time of benchmarking the total number of staff was 12. The Executive Director was supported by four Audit Directors (now by five), while the remaining staff provide support for a range of organisation matters, including events management, information technology and other administrative functions.

MISSION and OBJECTIVES

HETAC

HETAC sees its mission as being the development, promotion and maintenance of higher education and training awards to the highest international standards and quality. It has adopted the following strategic objectives in the pursuance of this mission, viz:

- (a) to determine and ensure compliance with, appropriate standards of higher education and training
- (b) to promote and support continuous improvement in the quality and standards of provision of higher education and training programmes, working in partnership and consultation with higher education and training stakeholders

- (c) to facilitate, develop and promote optimum delegation to recognised institutions, of authority to make awards within the national framework
- (d) to promote provider ownership of quality assurance and learner assessment procedures
- (e) in cooperation with providers, to promote the higher education and training awards of the Council both nationally and internationally
- (f) to ensure that clear and accurate information is made publicly available about the quality and standards of higher education and training provision
- (g) working with the National Qualifications Authority of Ireland and the Further Education and Training Awards Council, to play a full role in the development and management of the qualifications framework for lifelong learning
- (h) to apply international best practice in evaluation and reviews of higher education and training
- (i) working in partnership with the Department of Education and Science, to play an active role in leading and managing the changes necessary to implement the Bologna process for the development of the European Higher Education Area
- (j) to promote diversity within the higher education and training sector, and between further education and training and higher education and training.

ACQUIN

ACQUIN's mission is to apply independent, objective and quality-oriented assessment procedures in order to safeguard the quality processes in higher education, guarantee transparency and ensure that a diverse range of courses are offered. The Agency's main focus is the accreditation of bachelors and masters degree programmes. However, ACQUIN intends to expand the scope of its work to include initiatives in quality management.

The objectives of ACQUIN are to:

- (a) define and employ a set of tools for the accreditation of degree programs
- (b) develop further procedures for assessing and safeguarding quality processes in higher education
- (c) direct its activities towards safeguarding high-quality education and promoting internationally recognised degrees of a high standard
- (d) ensure that the general principles upon which accreditation procedures are based are consistent with the relevant laws, regulations and European directives
- (e) conclude agreements with other accreditation institutions, and
- (f) cooperate with HEIs, professional associations and businesses as well as with institutes within Germany and abroad which have the same purpose.

AUQA

At the time of the external review, AUQA's mission was to: "...provide public assurance of the quality of Australia's universities and other institutions of higher education, and will assist in improving the academic quality of these institutions", through means of quality audits of universities and accrediting agencies.

The realisation of this mission is achieved through the expression of the following four objectives in the AUQA Constitution, vis:

- (a) Arrange and manage a system of periodic audits of QA arrangements relating to the activities of Australian universities, other self-accrediting institutions (SAIs) and state and territory HE accreditation bodies.
- (b) Monitor, review, analyse and provide public reports on QA arrangements in SAIs, and on processes and procedures of state and territory accreditation authorities, and on the impact of those processes on quality of programs.
- (c) Report on the criteria for the accreditation of new universities and non-university HE courses as a result of information obtained during the audit of institutions and state and territory accreditation processes.

- (d) Report on the relative standards of the Australian HE system and its QA processes, including their international standing, as a result of information obtained during the audit process.

CONSEQUENCES OF DECISIONS — FORMAL and INFORMAL

HETAC

As previously noted, HETAC's relationship with its clients is mainly one of a statutory relationship while private providers opt to seek HETAC accreditation to secure recognition from the State of the programmes they deliver. Critically, the impact of decisions made by HETAC, based on recommendations from panels which are independent of the institutions and Government, will influence the standing and viability of the provider. This will apply also in the context of those decisions which are qualified or have conditions attached. Where a provider is the subject of such a decision, and while each panel is independent of each other, a recurrent pattern of such decisions will reflect on the institution, and question its commitment to programme preparation and delivery. Equally, the consistent securing of approval (irrespective of whether it is programme accreditation or quality assurance) and professional conduct of the provider during the panel visit will ensure that the institution is positively celebrated throughout the system.

An HEI may appeal HETAC the decision, but on grounds of non-compliance with procedure rather than content. Such appeals are pursued with the NQAI.

ACQUIN

In accordance with the established practice of the KMK and the Federal States, all bachelor and master programmes in Germany must undergo an accreditation procedure. While the timing of these processes may vary between the *Laender*, accreditation is a prerequisite for approval of the study programme or it must be completed within a certain period after the course has started. The consequences of an accreditation decision are solely with the HEIs and the Ministries. It is in their responsibility to decide under which conditions a study programme is allowed to start.

ACQUIN is independent of the Ministries in its accreditation decision, but it has to consider the binding regulations of the KMK and the AR. Integral to each accreditation decision, ACQUIN may comment on the quality of study programmes and HEIs will use this for its further guidance and development.

If an HEI does not agree to the accreditation decision, the HEI has the right to lodge an appeal. An objection to the accreditation decision may relate only to the basis for the decision — namely, the peer group report, the statement of the HEI and the statement of the Standing Expert Committee — and to the explanation for the decision. An appeal concerning formal and legal issues (e.g. contract HEI with ACQUIN) must be lodged with the ACQUIN Board of Directors. An appeal related to content and specific content-related issues of a study programme has to be lodged to the Accreditation Commission.

AUQA

As a private company, AUQA's independence from government enables it to be collaborative and supportive of institutions and agencies. In turn, institutions and agencies are urged not to focus on preparing for audit by AUQA, but rather to concentrate on the quality processes necessary for achieving their own objectives.

AUQA Audit Reports and the resultant auditee Progress Reports are public documents, and this single fact in itself gives AUQA considerable traction within the higher education sector. In addition, state and Commonwealth Governments apply pressure on institutions and accreditation agencies to implement AUQA's Recommendations. Therefore, AUQA is particularly concerned that its audit reports are recognised as being credible, and its audits acknowledged by stakeholders as being fair, and adding value for the auditees and their

stakeholders. The auditees are able to request a review of their audit report by a tripartite panel with an independent chair prior to the report's publication by AUQA and, to date, no institution or agency has requested such a review.

AUQA, therefore, proceeds to try and work as collaboratively as possible with the institutions and the agencies it audits, assisting and encouraging them towards the goal of continuous quality improvement through quality self-review and audit.

APPENDIX B DESCRIPTION OF KEY PROCESSES

HETAC

While the functions of HETAC embrace a wide activity within higher education in Ireland, it is proposed to focus on two key elements of its activity in the context of this Report, namely quality assurance and programme accreditation.

Quality Assurance

Section 28(4)–(5) of the *Qualifications Act* makes provision for HETAC to review from time to time the effectiveness of the academic quality assurance procedures of providers. The results of such reviews are published. In general, the Council reviews focus on the quality assurance policy and procedures themselves. In 2002, HETAC published guidelines²⁴ for quality assurance procedures which attempt to ensure that the following questions are addressed:

- (a) Does the provider have a quality ethos, together with procedures that embed that ethos, throughout the institution and in the programmes it provides?
- (b) Does the provider systematically monitor its progress towards achieving an appropriate range of quality goals and, in particular, further improving and maintaining the quality of the educational provision?
- (c) Are the findings from the quality assurance procedures used to improve the quality of the education and training provision and meet the needs of the learners?
- (d) Does the provider monitor the effectiveness of the services provided to the learner?
- (e) Is corrective action taken to remedy deficiencies identified by the quality assurance?

HETAC's elaboration of its quality assurance policy is designed to:

- (a) reflect the provider's mission and values and relate closely to the relevant strategic management plans and operations
- (b) set measurable quality objectives, at various functions and levels within the organisation
- (c) provide opportunities for analysis and development of the mission statement, values and plans
- (d) cover all relevant aspects of the provider's functions and operations, which impact on the standard and quality of its higher education and training programmes, e.g. teaching, research, learner support, academic support, accommodation, equipment and facilities, management and administration, community service and collaboration with industry
- (e) focus on how well the provider is achieving the goals derived from the mission statement.

A review of performance against targets is integral to such a policy. Learners' attainments of intended learning outcomes should be a major consideration. Further enhancement of programme quality should also be a major policy objective. Integral to the conduct of this review, there must be the involvement of external experts.

The quality assurance policy must include a commitment to the provision of adequate resources to enable the procedures to be implemented satisfactorily. Reflecting 'fitness for purpose', these procedures should make provision for the specific nature of the provider and its aims in relation to the needs of society and of the labour market.

The quality assurance procedures must provide for evidence in the form of verifiable data concerning the quality objects being monitored. For example, the quality objects should therefore be clearly defined; be consistent with the institutional and programme objectives; and be identifiable and measurable. Evidence of effective quality maintenance and improvement is essential for a quality assurance review. It is vital to provide for systematic

formal deliberative and decision-making procedures and executive action procedures, to ensure effective action as appropriate in response to findings from the quality monitoring.

Providers are requested to pay particular attention to aspects of quality performance which are less easily amenable to quantifiable monitoring. As such, they are required to develop strategies to ensure that such aspects are not overlooked. At the heart of the process, providers must respond to three issues, vis:

- (a) the objectives of the programme/service
- (b) evidence that the programme/service is meeting its objectives, and
- (c) effectiveness of procedures for correcting deficiencies and making improvements.

Quality assurance policy must articulate the procedures for the design and approval of new programmes, subjects and modules, and include evidence that the following issues have been satisfactorily addressed:

- (a) *Philosophy and aims of the programme*; including inter alia, the relevance of the programme to the mission and strategic plan of the provider; its objectives and learning outcomes of the programme, each subject and modules and relevance of the programme to the Irish, European and international labour markets.
- (b) *Procedures for the assessment of learners ensuring that procedures are fair and consistent and for the purpose of compliance with standards determined by the Council.*
- (c) *Procedures for ongoing monitoring of programmes* ensuring that programmes remain current and valid in the light of developing knowledge in the discipline and practice in its application.
- (d) *Procedures for evaluation of each programme at regular intervals* designed to ensure that that the quality improvements are made to programmes of higher education and training and that the programmes remain relevant to learner needs, including academic and labour market needs.
- (e) *Procedures for selection, appointment, appraisal and development of staff* in particular those procedures for selection, appointment, appraisal and development of staff involved at any level in the delivery or support of a programme.
- (f) *Procedures for evaluating premises, equipment and facilities* to ensure their continuing adequacy and effectiveness in relation to the programmes of higher education and training provided.
- (g) *Procedures for evaluating services related to programmes of higher education and training* including library, information and computing services, learner support services (both academic and non-academic).
- (h) *Procedures for evaluating the effectiveness of quality assurance procedures*, which requires the submission of a quality assurance manual and such other documentation as is required to demonstrate compliance with Council requirements, in particular in relation to the experience of the operation of the quality assurance procedures.

Programme Accreditation

HETAC generally commissions 50 programme accreditation (Level 6 to 9 of the National Framework for Qualifications) panels each year, while the IoTs, under delegated authority, pursue this activity within their own structures. The following criteria apply as matters of general principles and providers are required to demonstrate that:

- (a) its quality assurance procedures, as agreed with HETAC, have been applied to the development of the proposed programme
- (b) its programmes are consistent with its mission and make efficient use of resources (collaborating where this is beneficial)
- (c) the programme title must be clear, accurate, succinct and fit for the purpose of informing prospective learners and other stakeholders
- (d) the procedures for access, transfer and progression which have been established by the NQAI have been addressed and as such must be able to accommodate a variety of access and entry requirements.

At the more detailed level of the programme itself, there are specific themes sought in the accreditation process, which include:

- (a) Evidence that the programme design contains an underlying unifying theme with modules bonded by interactions which are either implicit or explicit.
- (b) The proposed approach to teaching and learning represents the rich diversity of teaching and learning modes.
- (c) The specific standard of knowledge, skill and competence standards articulated by HETAC for each named award can be achieved by the learner.
- (d) The learner assessment methods proposed are consistent with HETAC's policy on fair and consistent assessment, which must be capable, among other things, of demonstrating attainment of the standards of knowledge, skill or competence, determined by HETAC, for the related award.

Accreditation Process

The programme submission document is sent to HETAC in sufficient time for the accreditation process to be completed before the planned commencement date of the programme. An initial evaluation of the programme submission is made against HETAC's criteria by the Executive of HETAC. Thereafter, submissions will be forwarded to the members of the evaluation group appointed by HETAC.

The evaluation group will, normally, wish to discuss the programme submission with the senior management team (the Director of the provider, the head of the relevant school, head of department or their equivalents) and a representative selection of the staff involved in the development, teaching and assessment of the programme concerned. The opening and closing sessions will be with the senior management team. The evaluation group may review facilities including those in other location(s), where this is deemed appropriate. HETAC has a series of protocols for communication between the provider and the panel, which are designed to protect the independence and integrity of the process.

The report will be written by the chairperson of the evaluation group, in consultation with the other assessors, and once agreed it will be forwarded to the HETAC representative. This in turn is sent to the provider's registrar, which provides an opportunity to comment on the findings and correct any factual errors. Once finalised, the report is then presented to the HETAC Council (or an appropriately delegated committee) for decision. The recommendation of the final report may take one of four models:

- (a) Full recommendation
- (b) Recommendation (with qualification not of sufficient importance to withhold accreditation)
- (c) Request for resubmission of programme for future consideration (i.e. the panel while content with the overall direction, were of the opinion that further preparation was required)
- (d) Refusal to accredit.

If the final option is taken by HETAC, it will communicate its decision in writing to the provider of the programme, indicating its opinion and the reasons for that opinion. The provider of the education and training programme may appeal such a decision to the NQAI. However, as previously indicated, the appeal may be on the basis of process rather than substance. The Qualifications Authority will, following consultation with HETAC, examine the appeal and decide to either uphold the decision of HETAC or annul the decision and substitute its decision for the decision of HETAC. The final report, together with a certificate of programme accreditation and an Order in Council, will be sent to the Director (or equivalent) of the provider by the chief executive of HETAC.

HETAC will publish the findings of the evaluation concomitantly with the issue of the certificate of programme accreditation, giving sufficient detail to cater for the information needs of the stakeholders.

Appointment to Panels

HETAC has procedures²⁵ in place governing the appointment of panel members, which require that members have expertise in the field of learning relating to the programme submitted for accreditation by the provider. HETAC ensures that they are fully briefed on its policy, criteria and procedures of HETAC and the background and legislative context within which accreditation operates. Each group has a chairperson, selected for his/her respected status, knowledge of public policy and administration and experience of programme design and evaluation in the higher education and training sector.

Broadly, therefore, a typical group will have the following mix of competences:

- (a) development, provision and evaluation of higher education and training programmes in the specific area of the proposed programme
- (b) design, implementation and evaluation of quality assurance systems in a higher education and training environment
- (c) knowledge of the relevance of national, international, regional and sectoral contexts in which the development, provision and evaluation of the proposed higher education programme takes place
- (d) knowledge of issues relating to learner requirements of higher education and training providers in respect of the proposed programme.

ACQUIN

Central to ACQUIN's accreditation procedures is the recognition of HEI autonomy and academic freedom. The HEI has the primary responsibility for the quality of the study programme and for designing quality criteria. This central tenet ensures acceptance of the analysis, assessments and judgements made by ACQUIN.

Using the degree programme's declared objective as a starting point, the ACQUIN approach examines the coherence and consistency of the concept, of implementation as well as the competence and capacity of the degree programme provider to check, assure and enhance quality. In many respects, the panel addresses the following key questions:

- (a) What are the objectives for the degree programme? Are they valid?
- (b) Is the degree programme unified? Are the single units of the programme suitable to reach the defined objectives?
- (c) Is a consistent implementation of the degree programme concept assured?
- (d) Is there a suitable process to revise the objectives, the concept and the implementation?
- (e) Does iteration take place in order to eliminate errors and ensure optimisation at all process stages?

In ACQUIN's approach the four steps of objective, concept, implementation and quality review and improvement are based on the concept of a quality cycle. ACQUIN checks for validity, coherence, transparency and consistent implementation and updates. In this way, quality improvement in the quality cycle is demonstrated.

ACQUIN has implemented an effective and transparent accreditation procedure, including careful peer appointment and an intensive and thorough on-site visit. The evaluation criteria used in the procedure are comprehensively described in the ACQUIN Guidelines. The procedural steps of the assessment and accreditation process are taken in a clearly defined sequence. The system of feedback loops supports the process of internal information and communication and the implementation of internal procedure standards.

Peer Nomination

One of the main elements of an ACQUIN accreditation procedure is the peer review. The composition and quality of which determines the quality of the accreditation procedure. The

peer selection procedure must be transparent for all those involved and the basic characteristics of all of its processes must be established beforehand to make them both understandable and standardised.

ACQUIN therefore takes great care to select and appoint peers in a targeted manner, to carefully define and convey requirements of the process to the peers by means of suitable instruction.

However, the evaluation does not solely hinge on a high level of expertise which is relevant to the degree course to be accredited. The peers must also have skills which allow them to evaluate in a wider context, based on their expertise, as to the quality of the degree course and its fit within the HEI as an education provider, of the students as clients and the professional world as a source of demand for graduates. This also, however, includes a statement as to the degree course's place within the HEI system with its specific requirements, such as modularisation, the credit transfer system, the different roles of universities and universities of applied sciences as well as bachelor or master level within the broader framework of the national qualification system.

Self-report

The basis for the evaluation and accreditation procedure is the self-report of the HEI and the on-site visit. As part of this process, the HEI applies the ACQUIN Guidelines, which describe the specific profile of the programme and the strengths and weakness of the individual elements.

On-site Visit

The on-site visit is central to the accreditation procedure. During the on-site visit the peers will conduct several interviews with academic staff, students, rectors/presidents and view the facilities (e.g. library, laboratories, class rooms, working rooms). The interaction between the panel and HEI focuses on the objectives, conception, implementation and quality assurance of the respective study program. Every on-site visit starts with an internal meeting of the peers in order to discuss questions concerning the degree programme. They also agree the structure for the discussions with the HEI. During the on-site visit there will be also time for internal discussions and reflection on the information gathered. At the end of the on-site visit the peers agree upon their recommendations for submission to the Accreditation Commission of ACQUIN.

Peer Report

Within two weeks after the on-site visit the peers write a report which analyses the strengths and weakness of the study programme according to the defined objectives. The report includes also the accreditation recommendation for the study program. ACQUIN's head office coordinates the completion of the final version of the report.

Statement of the HEI

The final version of the report, without the accreditation recommendation of the peers, is sent to the HEI, which may correct facts and provide additional information which it considers to be of importance for the decision-making process.

Statement of the Standing Expert Committee

The Standard Expert Committee scrutinises the adequateness of the external assessment and the reporting, taking into account the statement of the HEI and the peer report including the accreditation recommendation of the peers. Through its overview of all accreditation procedures in its specific field the SEC scrutinises the suitability of the assessment procedure and balances between different peer groups.

Accreditation Decision Procedure

The peer report, the HEI's statement and the Standing Expert Commission's statement on procedural issues are the basis for the decision-making process of the Accreditation

Commission. These documents are used solely for ACQUIN's internal decision processes and are not made public.

A short summary of the report including the names of the peers and the accreditation decision is published on the website of ACQUIN and the Accreditation Council in those cases where a positive accreditation decision has been made.

Accreditation Decisions

There are the following types of accreditation decisions:

- (a) Accreditation without conditions: The degree programme has no fundamental defects in respect to content or structure. The accreditation is valid for five years, after this the study programme has to undergo a reaccreditation procedure. Nonetheless during these five years the programme should be continuously reviewed by the HEI and if necessary developed further. The peer report includes recommendations which the HEI should consider to implement for quality improvement.
- (b) Accreditation with one or more conditions: The degree programme has defects of content or structure which must be corrected in order to ensure the quality of the programme. In this case the programme is accredited for one year. The HEI must implement the corrections and demonstrate that the defects have been eliminated within a stipulated period (six months). The decision as to whether the conditions have been fulfilled is based on a new accreditation decision and is therefore taken by the Accreditation Commission. If the Commission comes to the conclusion that the conditions have not been fulfilled, the procedure will end with a negative result (no accreditation).
- (c) Deferral of accreditation: In this case the degree programme remains unaccredited for the time being, but accreditation is declared to be achievable. Before an accreditation can be granted, major defects of content or structure must be eliminated. In this case the time for necessary corrections is set to a maximum of 18 months. The procedural steps for resumption of the procedure after the deferral are similar to those involved in confirmation of fulfilment of conditions.
- (d) Rejection/no accreditation: If a study programme has fundamental defects which cannot be eliminated by corrective measures the accreditation will be denied. The same programme cannot be submitted for accreditation to the same or another agency.

AUQA

Quality Audit

AUQA's quality audits of institutions and agencies are performed to investigate the appropriateness of an organisation's QA plans and processes, and the rigour and effectiveness of performance monitoring against the plans. In brief, for any given issue, AUQA is interested in the organisation's intended approach and the manner of deployment. It also reviews the results and any improvements arising from these.

Quality audit is a composite process that is owned and implemented by both the auditee and the EQA, with the latter performing a verification, reporting and enhancement role. AUQA's quality audits of institutions pay particular attention to:

- (a) Course and programme approval and monitoring
- (b) Research activities and outputs
- (c) Overseas operations, including comparability of standards, on-shore and off-shore
- (d) Communication with stakeholders
- (e) Systematic internally initiated reviews (e.g. of departments, themes), including the rigour and effectiveness of the review mechanisms employed, and as appropriate will refer to planning documents, such as strategic, research, equity and quality plans.

AUQA bases its audits on a critical self-review (also referred to as self-evaluation or self-audit) being performed by the institution or agency subject to the audit. Such a self-review not only enables the auditee to supply the information required by AUQA, but also has the

potential to lead to improvements even without AUQA's involvement. AUQA's emphasis on meaningful self-review has several merits, including:

- (a) recognition of auditee's autonomy and responsibility
- (b) recognition of the diversity of auditees
- (c) enabling different approaches to self-monitoring
- (d) initiation and/or maintenance of a process of critical self-development, and
- (e) production of information, some of which may not normally be evident.

AUQA also carries out its audits by a process of extended peer review. The term "peer" means "a person or group with similar knowledge, skills, experience and status in the relevant context."²⁶ In academia, it often means simply "another academic", and more generally it often denotes someone in the same professional field. However, rightly or wrongly, this can engender public suspicion of peer review. There may be a perception that peer review does not result in independent objective judgements, but that the reviewers are more inclined to conceal their colleagues' defects.

To avoid both this effect and the suspicion of this effect, AUQA has extended the interpretation of "peer". In addition to people from within Australian universities and SAIs, audit panels always include people from outside Australian academia who have knowledge of or expertise in some aspects of what is being reviewed, but who have applied it in a different context and/or with different underlying assumptions. A typical AUQA audit panel will consist of two senior Australian academics; one Australian "industry person", from outside academe; one "overseas person", usually a senior academic from an overseas university, or an external quality agency; and an AUQA Audit Director (professional staff). AUQA maintains a register of approximately 100 approved auditors with these characteristics.

The evaluation and checking of the self-review by the AUQA Audit Panel will:

- (a) respect the objectives and values of the auditee
- (b) contribute towards the auditee's process of self-learning
- (c) for an institution, elucidate how it judges its teaching and research in relation to national and international standards, and
- (d) for an agency, elucidate how it defines and measures its effectiveness.

This process is implemented by AUQA Audit Panels and includes requesting additional information and documentation from the auditee, undertaking a preparatory visit and several audit visits, and conducting multiple interviews with a wide range of staff, students and external stakeholders.

Audit reports go through several drafts, each being reviewed by the entire audit panel and also by AUQA staff, including the Executive Director, the back-up Audit Director, and a specialist proofreader.

Audit findings are initially reported to the auditee in the form of a "definitive draft" for checking "on matters of fact and emphases". Simultaneously, the definitive draft is circulated to the members of the AUQA Board for comment. The Final Report is then drafted, involving the panel in review of the auditee's comments on the definitive draft, and approval by the AUQA Board.

As a matter of policy, the AUQA Board has agreed that it has no basis to question or change the substance of the audit reports, as it has not been involved in the audit process. Directors have not seen the audit documents nor interviewed the auditee. They are, therefore, uninformed of the matters investigated by the audit panel, and unaware of the balance that the panel has decided is appropriate. Furthermore, in considering an audit report they cannot bring into consideration any evidence external to what they read in the audit report itself.

Within these parameters, the Board's responsibilities are to ensure that AUQA policies are being adhered to and identify any statements that appear susceptible to legal action (e.g.

regarding defamation or breach of commercial confidentiality). Finally, the Board may also comment if it believes that the report does not appear as thorough and rigorous as would be expected of an AUQA report.

However, as senior independent readers of the report, Directors may be able to comment on whether the report is clearly expressed and well-argued (in its own terms).

At this stage of the approval process the auditee is also asked if it is requesting a review prior to the publication of the full final report (generally 40 to 50 pages in extent). If a review is not requested, the report is published on the AUQA website at a mutually agreed date. If a review is requested, a review panel is established with a member from the auditee, a member from AUQA, and an independent chair. So far all AUQA's audit reports have been approved by its Board as presented in their final form, and no AUQA auditee has requested a review of a final audit report.

Quality Enhancement

In addition, and as a result of undertaking quality audits, AUQA is also involved in carrying out a number of higher education sector-wide quality enhancement activities. AUQA:

- (a) maintains a Good Practice Database, consisting of selected institutional practices commended during the audits
- (b) organises and runs a national Quality Forum on important quality issues on an annual basis, and has introduced a national Quality in Higher Education Award, presented annually at the Forum
- (c) publishes papers and articles on important quality issues
- (d) provides auditor training programs and runs workshops and seminars on other quality issues, as well as advice to institutions, governments and professional associations.

¹ *Review of Higher Education in Ireland* OECD 2004.

² A "self-accrediting institution" (SAI) is one that has been authorised to introduce ("accredit") new programs without seeking the approval of any external body. There are 39 self-accrediting Australian universities and four other SAIs. AUQA's audits of SAIs are intended to support quality and diversity. A "non self-accrediting institution" (NSAI) must seek approval at both institution and programme level from the higher education accrediting agency in the state or territory in which it is located. AUQA's audits of the state and territory higher education accreditation agencies (STAAAs) are intended to support quality and consistency.

³ *Strategic Plan 2006 – 2010*, HETAC (2006).

⁴ *Standards and Guidelines for Quality Assurance in the European Higher Education Area* ENQA 2005.

⁵ *Socrates – from The Phaedrus Dialogue*, Plato, in which the case is put that making judgements about quality invariably involves having to balance arguments that are based on external authority, against those based on internal autonomy.

⁶ *International Network for Quality Assurance Agencies in Higher Education (INQAAHE) Guidelines of Good Practice 2005*.

⁷ *Review of the Australian Universities Quality Agency, Final Report, May 2006*, p.24. Available on AUQA website at: http://www.auqa.edu.au/aboutauqa/externalreview/review_report.pdf.

⁸ *Ibid.*, p.25.

⁹ *NQAI, 2006 Review of the Performance by the Higher Education and Training Awards Council of its Functions*.

¹⁰ Decision of the Accreditation Council, of 22.06.2006, on the application of the Accreditation, Certification and Quality Assurance Institute (reg ass) Bayreuth (ACQUIN) for re-accreditation, of 27.01.2006, Amendment to the Decision.

¹¹ *Review of the Australian Universities Quality Agency*, op. cit., p.13 & p.150.

¹² Statement of ENQA to Conference of European Ministers of Education, Berlin, 18–19 September 2003.

¹³ 'Trance, Transparency and Transformation', Bjorn Stensaker, *Quality in Higher Education*, Vol. 9, No. 2, July 2003.

¹⁴ 'Comparing Standards for External Quality Assurance Agencies', Guy Aelterman, *Quality in Higher Education*, Vol. 12, No. 3, November 2006.

¹⁵ *Ibid.*

¹⁶ 'The End of Quality?', Harvey, *Quality in Higher Education*, Vol. 8, No 1, July 2003.

¹⁷ *London Communiqué "Towards the EHEA: Responding to the Challenges in a Globalised World"*, May 2007.

¹⁸ Ibid.

¹⁹ 'Trance, Transparency and Transformation', Bjorn Stensaker, *Quality in Higher Education*, Vol. 9, No. 2, July 2003.

²⁰ 'War of the Worlds', Lee Harvey, *Quality in Higher Education*, Vol. 10, No 1, April 2004.

²¹ 'Trance, Transparency and Transformation', Bjorn Stensaker, *Quality in Higher Education*, Vol. 9, No. 2, July 2003.

²² *10 Years On Lessons Learned from the Institutional Evaluation Programme*, Dr Stefanie Hofman, 2005.

²³ Ibid.

²⁴ *Guidelines and Criteria for Quality Assurance Procedures in Higher Education and Training*, HETAC (2002).

²⁵ *Taught and Research Programme Accreditation Policy, Criteria and Processes*: HETAC (2005).

²⁶ *AUQA Audit Manual Version 3.0*, July 2006.

