
EUA'S QA POLICY POSITION IN THE CONTEXT OF THE BERLIN COMMUNIQUE

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INTRODUCTION

The following policy paper develops further the EUA's QA position (Graz Declaration) in the context of the QA action lines of the Berlin Communiqué. Specifically, the Berlin Communiqué:

- Recognises the role of HEIs in promoting quality (this constitutes the first official acknowledgement in the context of the Bologna process)

- Invites ENQA, in co-operation with EUA, ESIB and EURASHE,

- A. to develop an agreed set of standards, procedures and guidelines on quality assurance

- B. to explore ways of ensuring an adequate peer-review system for QA & Agencies.

This paper presents a discussion on the first policy line of the Berlin Communiqué, which has been endorsed by the EUA Council on 1 April 2004. The EUA position paper on the second line of the Berlin Communiqué will be presented to the Council during a consultation period (20 April – 20 May 2004) and will be circulated to the EUA membership shortly thereafter.

I. QUALITY AND STANDARDS

In discussions that EUA held with various stakeholders and members, it has become clear that the word "Standard" in the Berlin Communiqué is open to interpretation. Some understand that standards must refer to QA procedures and others argue that they refer to higher education institutions. Based on the discussions in the Bologna Follow-up Group and on the following considerations (cf. 1.1 – 1.3 below), EUA believes that the "standards, procedures and guidelines" were meant to refer to quality assurance. This is the perspective adopted in this paper and the following three points explain the rationale for this approach.

1.1 EUA strongly believes that it is important for the Bologna process to be articulated with the Lisbon objectives. In this perspective, it is difficult to see how a broad use of "standards" that would be applied to higher education institutions would allow Europe to reach the objectives of becoming the most competitive knowledge society in the world. This ambitious objective requires a diverse and innovative HE sector across the continent, as the current

national debates show (e.g., France, Germany, Ireland, UK). In risking to stifle diversity and innovation in the sector, standards would constitute a threat to reaching the Lisbon objectives.

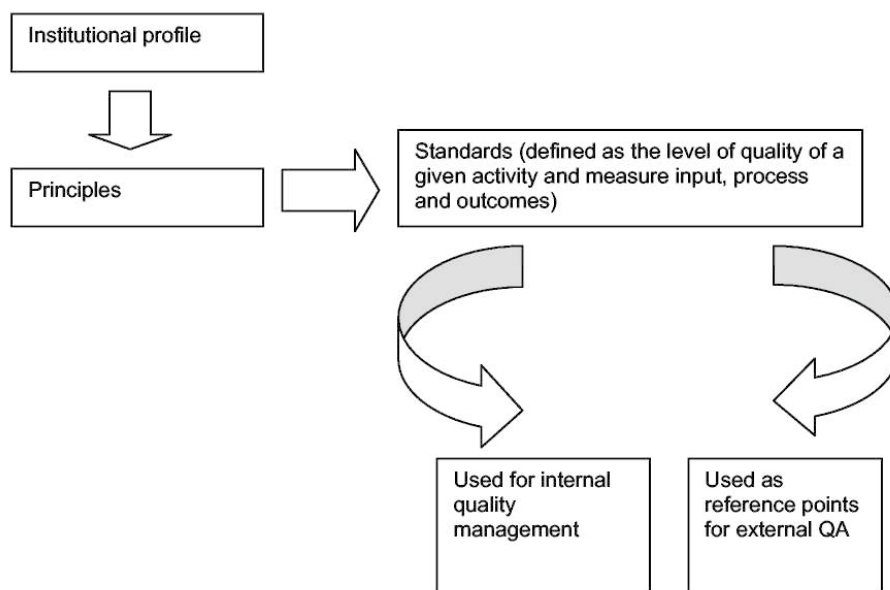
2.2 The Institutional Evaluation Programme has given EUA a solid experience in transnational evaluation, one that is unmatched anywhere in Europe and the world. EUA has evaluated close to 120 universities in 35 different countries. This ten-year experience, combined with the outcomes of the Quality Culture project, points to the fact that it is impossible to reach agreement on quality standards when dealing with a diversity of institutions across a whole continent.

3.3 Higher education institutions are characterised by a diffused and devolved power structure, complex and somewhat ambiguous goals, and outcomes that are difficult to measure or quantify. In this respect, we may well ponder the astute observation of Martin Trow, a distinguished professor of education at the University of California (Berkeley), who noted that "The real and substantial effects of the experience of higher education extend over the whole lifetime of graduates, and are inextricably entwined with other forces and experiences beyond the walls and the reach of universities" (Trow 1996). Martin Trow recommends that evaluations focus on the capacity for higher education institutions to change: "How an institution responds to change points to deep-seated qualities of the unit which must also show up in its research and teaching." (Trow 1994)¹.

This observation suggests that:

- Evaluation approaches that are based on standards, quantitative methods, sets of criteria, or checklists will not improve quality meaningfully and may not even control it significantly because they will not capture the complexity of the educational enterprise.

¹ Trow, Martin, 1994, «Academic reviews and the culture of excellence, 1994, reprinted in *Quality Management in Higher Education Institutions*, Lemma Publisher, Utrecht, The Netherlands, 1999. Trow, Martin, 1996 «Trust, Markets and Accountability in Higher Education: A comprehensive Perspective», in SRHE, *The 30th Anniversary seminars*.



■ Autonomy is a precondition for a capacity to respond to change. Thus, university autonomy requires that each institution decides on its standards in the context of its mission and goals. As the following graph illustrates²:

II. POLICY GOALS

As discussed at the EUA Graz Convention (May 2003), the policy goals for an appropriate European QA dimension are:

■ *Achieve greater compatibility while managing diversity of QA&A procedures:*

There is a great diversity of national procedures in Europe that needs to be accepted as this diversity reflects specific national circumstances that each national QA framework tries to address. Upholding a widely shared set of standards in the QA area would ensure compatibility while minimising intrusiveness in national frameworks.

■ *Achieve trust:*

It is evident from discussions with various key actors, that some believe that trust across Europe can be achieved only if all QA & A agencies follow similar procedures and guidelines. EUA contends that trust emanates from the way in which and the spirit with which QA procedures and guidelines are carried out rather than simply in having a similar protocol of procedures or set of guidelines. In other words, trust is based on professionalism, grounded in a set of standards.

■ *Promote innovative and dynamic institutions in a context characterised by diversity of missions, goals and curricula:*

The Berlin Communiqué refers to “standards of QA procedures”. Section III below details what these standards might be. It is important to note that the proposed set of six standards is applicable to QA & A as indicated by the wording of the Berlin Communiqué (cf. Section I above for a fuller discussion of this point).

■ *Preserve and extend institutional autonomy while meeting the demands for accountability:*

It is essential that the development of a European QA dimension accompanies and extends institutional autonomy in order to ensure that QA & A is not merely window-dressing and a compliance exercise. The Berlin Communiqué acknowledges the central role that institutions must play in this respect.

■ *Avoid a big bureaucracy, burdensome QA&A mechanisms and promote cost-effective QA&A procedures.*

Care must be taken that funds are not wasted on complex bureaucratic arrangements or on QA & A procedures that put an undue drain on human and financial resources.

■ *Ensure the role of the HE sector in any future monitoring scheme:*

Given the emphasis placed by the Berlin Communiqué regarding the role of higher education institutions in promoting quality, it is essential that the sector plays a role in any future monitoring scheme in order to guarantee that academic core values are upheld and, most importantly, to ensure the adhesion of the academic community.

¹ Frans Van Vught, presentation at the EUA Seminar on the QA lines of the Berlin Communiqué, University of Zurich, 26 February 2004, funded by the Swiss Confederation.

III. STANDARDS, PROCEDURES AND GUIDELINES ON QUALITY ASSURANCE

EUA members discussed in Graz a code of principles. These principles are retained in this document but are now called “standards” to use the wordings of the Berlin Communiqué. To each “standard” corresponds a set of “Procedures” and “Guidelines”.

This section identifies a set of standards, procedures and guidelines, which are defined as follows:

- **Standards** state the principles and values that need to be upheld

- **Procedures** identify the protocols used by external QA & A agencies to meet the standards

- **Guidelines** refer to reference points by which to evaluate if the standards are met From the policy goals established above, EUA derives the following six standards and associated sets of procedures and guidelines for QA & A.

STANDARD 1: QA&A procedures will promote institutional autonomy and diversity and foster innovation by evaluating institutions against their mission and strategic plans.

Procedure 1-1: QA & A will be based on a fitness for purpose approach and will evaluate against the specific mission and goals of an institution.

Procedure 1-2: QA & A will start with an understanding of the legal scope of institutional autonomy, including funding arrangements and staff management issues in order to grasp what latitude the institutions has in its operations.

Procedure 1-3: QA & A will assess the capacity of an institution to innovate by examining its decision-making processes and its ability for mid- and long-term strategic planning to assess the degree to which these are effective and efficient.

Guideline 1-A: Recommendations will be based on a fitness for purpose approach while questioning, where appropriate, the fitness of objectives in terms of their feasibility and desirability (i.e., both fitness for and of purpose will be examined).

Guideline 1-B: Recommendations will encourage institutions to take full advantage of their autonomy and, in cases where the legal framework is too restrictive, to make suggestions to enlarge this scope.

Guideline 1-C: Recommendations will promote innovative institutions by making specific suggestions to improve strategic planning capacity.

Guideline 1-D: Recommendations will take into account the financial resources and the funding arrangement of the institution in order to assess if preconditions are met to support its capacity for long-term planning and innovation.

STANDARD 2: QA&A procedures will promote organisational quality

Procedure 2-1: Organisational quality refers to sound management and decision-making processes. Their evaluation will be anchored in an understanding of the complexity of functions and the collegial tradition of higher education. In other words, organisational quality of higher education institutions will (i) balance the need for efficiency with the requirements associated with public service and (ii) take into account both the relative flat hierarchy that characterises higher education institutions (where knowledge and expertise are distributed throughout the organisation) and their need to build a community through collegial decision-making.

Guideline 2-A: Recommendations will address the extent to which institutions meet the need for efficiency in appropriate areas (e.g., in the administrative line, business ventures, health and safety, management of equipment and buildings).

Guideline 2-B: Recommendations will address the extent to which institutions are serving students and the public through an examination of such issues as access and diversity and links to the local and regional community.

Guideline 2-C: Recommendations will address the extent to which collegiality and community building are promoted through an internal communication strategy and participation in decision-making processes.

Guideline 2-D: Recommendations will address the balance between centralised and decentralised decision-making processes (i.e., the remit of rectorate vs. deans and department heads) and will address such issues as the clarity of responsibility and accountability of the various actors, the use of appropriate staff development schemes and feedback loop of internal quality monitoring into the decision-making process.

STANDARD 3: QA&A procedures will be geared at enhancement, which means that they will prompt institutions to develop internal quality measures and will emphasise self-evaluation as a key step in the procedure.

Procedure 3-1: The self-evaluation phase is an essential element in QA & A procedures and will be viewed as a collective opportunity for the institution to develop further its capacity for self-reflection and an internal quality culture.

Procedure 3-2: Internal quality monitoring will include the evaluation of all activities and programmes on a cyclical basis and be characterised by an understanding of quality standards that is widely shared across the institution.

Guideline 3-A: The QA & A agency has guidelines for the self-evaluation and offers training and support to institutions engaged in this process.

Guideline 3-B: The evaluation/accreditation report will be based on a self-evaluation report and will assess how successful the self-evaluation process was in bringing the institution together to reflect upon institutional strengths and weaknesses and its capacity to develop recommendations for improvement.

Guideline 3-C: Internal quality will not be viewed merely as a set of technical and managerial procedures but as a means to promote organisational quality through a proper embedding of a quality culture.

Guideline 3-D: Recommendations will address the extent to which a culture of quality and a common set of standards are shared across the institution.

STANDARD 4: QA&A procedures will assure public accountability by including stakeholders in the process, communicating the results to the public and be independent, in terms of their outcomes, of governments, interest groups and individual higher education institutions.

Procedure 4-1: The external panel will be assembled according to the following principles: expertise, objectivity and fairness. The institution being evaluated will have a right of veto on any panel member who is deemed to have a conflict of interest. The institution, however, will not have the opportunity to nominate experts on the external panels.

Procedure 4-2: The external panel will be given appropriate training to understand the procedures and scope of the evaluation and be sensitised to its ethical aspects.

Procedure 4-3: The site visit programme will be agreed between the external panel and the institution (with input from the QA & A agency) and include discussions with all the key groups in the institution (e.g., leadership, students, academic and administrative staff) and external stakeholders. The institution, however, shall not dictate the programme of the site visit.

Procedure 4-4: The external panel will produce a public report autonomously from the institution and the QA & A agency. The institution has the right to correct factual errors. In case of accreditation, the decision of the panel will be respected by the accreditation agency and the national authority.

Guideline 4-A: The QA & A agency has developed a code of ethics to ensure the independence of expert panels.

Guideline 4-B: The QA & A agency has a training programme for experts as well as guidelines for the site-visits and the report-writing phase.

Guideline 4-C: The external panels will meet the various key groups in the institution, unaccompanied by agency representatives or national authority. The external panel will meet students, academic and administrative staff members and external stakeholders, unaccompanied by representatives of the institutional leadership team.

Guideline 4-D: The report will reflect the view of all internal and external stakeholders whom the external panel met as well as the views of the whole expert panel..

Guideline 4-E: The report is made public after the institution has had the opportunity to correct factual errors. It will be written autonomously from the agency and the public authority and under the supervision of the chair of the expert panel (i.e., the report writer is an expert panel member rather than an agency or government representative).

STANDARD 5: QA&A procedures will follow guidelines that are transparent to the public and higher education institutions and will have specified and fair appeals procedures.

Procedure 5-1: The QA & A agency has developed and published a set of guidelines for all phases of the procedures which have been widely discussed.

Procedure 5-2: The QA & A agency has developed a set of procedures for appeals, especially in the case of negative accreditation decisions.

Guideline 5-A: The QA & A guidelines will be supported by the academic community as constituting fair and reasonable accountability procedures.

Guideline 5-B: The scope and limitations of QA & A procedures will be clear to the public and especially to students.

Guideline 5-C: Appeals board will include up-standing and independent members who have a demonstrated understanding of both higher education and evaluation. Board composition will be agreed upon in advance of any specific appeal procedure.

Guideline 5-D: Appeals board will hold hearings with the institution, the external panel and QA & A agency staff.

Guideline 5-E: Appeals board decisions will be reached independently of government, QA & A agency and higher education institutions and are binding.

STANDARD 6: QA&A agencies, where they exist, will have internal quality processes in place and be evaluated themselves, on a cyclical basis, in terms of the adequacy of their resources and their impact on institutions.

Procedure 6-1: The QA & A agency has clearly established lines of responsibilities.

Procedure 6-2: The QA & A agency has a training programme for its staff and a performance appraisal and staff development framework.

Procedure 6-3: The QA & A agency monitors the impact of its work on institutions in terms of efficiency (its financial burden as expressed in staff and direct costs to the institutions) and efficacy (whether quality enhancement does indeed result from the procedures).

Procedure 6-4: The QA & A agency is reviewed by a transnational expert panel that includes members of the higher education community and QA & A representatives, students and employers.

Guideline 6-A: There is documentation that QA & A agencies personnel policies have been openly discussed, published and implemented.

Guideline 6-B: The QA & A agency monitors its work by asking, within a year of an evaluation, that all institutions that it has evaluated provide the agency with an assessment of the procedure in terms of its outcome and cost.

Guideline 6-C: The transnational expert panel will be agreed with the national Rectors' Conference and the QA & A agency and will include one national member to assist in providing national understanding.

Guideline 6-D: The expert panel will interview a sample of all stakeholders to assess the fairness, independence and outcomes of the QA & A agency work.

Guideline 6-E: The expert panel will assess whether the QA & A agency has the appropriate financial and human resources and appropriate staff management policies to carry out its work professionally.