External evaluation of the LLP project: Identifying Barriers in Promoting European Standards and Guidelines for Quality Assurance at the Institutional Level (IBAR)

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1. Executive summary

Quality and excellence have become two defining characteristics and differentiators of higher education at national and global level. The IBAR project is therefore timely in its efforts to effectively get behind the implementation of the European Standards and Guidelines (ESG) for quality assurance, by comparing the procedures and practices of different HEIs across seven different countries. The focus at the institutional level is important, because it is in this context that European and national policy is adapted, adopted and interpreted. Indeed, the project reveals the significant extent to which HEIs in very different national and institutional context are following similar procedures via similar organisational units. This is another sign that the Bologna Process has been remarkably successful at creating the EHEA. The project also asks important questions about institutional barriers, and seeks to put forward some examples of good (best) practice for institutions and policymakers which will provide very practical applications.

In general, the project team is to be commended for the extensive scope of the study, and the significant amount of data gathering and analysis that has been undertaken within a relatively short timeframe; a rough estimate suggests that over 800 people have been interviewed during the course of the research. At the outset of the study, a conceptual framework was developed based on insights from implementation studies combined with field-specific knowledge about higher education. Autonomy at different levels in higher education was seen as a considerable challenge to the technical "implementation" of the ESG. Due to this, the concept of translation or interpretation was considered as a more relevant way to describe the expected outcome of the study. Perhaps not surprisingly, the project has indeed found many "translations" in the various countries and institutions studied. The challenge of the project – as also underlined in our midterm evaluation – is to identify common denominators among the many translations done.

The ESG was initiated to stimulate to increased compatibility and transparency in European higher education, although the IBAR study may have demonstrated that there is still a long way to go before these objectives have been met. On the other hand, while the ESG is far from known at the institutional level, it can be stated that it has created a vocabulary for discussing compatibility and transparency in higher education, and that perhaps this is an important achievement in itself. Other main implications and achievements of the IBAR project are:

- IBAR has demonstrated the interdependence between national laws and regulations and institutional behaviour. As such, the project may provide important leads with respect to how the ESG may "fit" into current governance challenges in higher education.

- IBAR has also demonstrated the limitations of the ESG in a number of areas, and points to key stakeholders (academic staff) that perhaps need to be involved in the revision and continuing spread the ESG.

- IBAR has also demonstrated the institutional diversity found through the universities and colleges covered in the study. For those with an institutional responsibility the IBAR project might provide specific examples of practises and initiatives that seems to work, and suggestions about how they may be translated to other settings.

- IBAR makes an important contribution to our understanding of issues around academic quality, qualifications and competence, and the relationship and transition between secondary and tertiary education, and how student preparedness

impacts on quality. In doing so, it emphasizes the importance of taking a whole-of-education approach.

- IBAR has highlighted the tension between emphasis on quality assurance processes and a deeper understanding of what is meant by quality. In this respect the project has added another layer of complexity to the project, which invites to further research.

In relation to the latter point, it is important to underline that the IBAR project has generated a lot of very interesting data which has not been exploited to the maximum due to time and resource constraints. This data should make further analysis and research projects possible, making the IBAR project a starting point for more systematic investigations concerning institutional changes in European higher education.

2. Introduction

The current report contains both the mid-term evaluation of the IBAR project, and the overall evaluation of the project. The mid-term evaluation covered the activities and results from January 2011 to June 2012. The key objectives of the IBAR project was the starting point for the evaluation, although not all objectives were met in the time period covered in the midway evaluation. As such, the ambition of the midway evaluation was to provide reflections and advice to the project group regarding how the specified objectives of the project could be achieved within the remaining project period. Hence, the first part of this report was designed as a formative input to an on-going project. The second part of the evaluation was more aimed at creating an overall assessment of the project and its achievements.

The IBAR project, as the title of the project suggest, is a project trying to identify barriers to the implementation of the European Standards and Guidelines (ESG) at the institutional level. The project has seven partners (from CZ, UK, NL, PT, PL, SK and LV), is based on a conceptual framework sketching out how "implementation" of the ESG could be realised, and investigates 28 higher education institutions in the seven countries trying to identify specific factors limiting the spread of the ESG.

According to its own aims and objectives, the IBAR project set out to:

"identify barriers to the ESG Part 1 implementation, and, based on that, to provide recommendations to modification of the ESG Part 1 standards and guidelines pertaining to them. In concrete terms, the objectives of the project are as follows:

a. description of policy practise at institutional level; b. identification of barriers of the ESG Part 1 implementation at institutional level in the following domains: access, student participation, institutional governance and management, employers including private sector, teaching staff, information systems, quality and secondary education; c. comparison of similarities and differences in the ESG Part 1 implementation; d. analysis of the impact of the ESG Part 1 implementation on secondary education; e. formulation of recommendations on ESG Part 1 modification, including the pertaining guidelines; f. publication of the book and the final synthesis report; g. dissemination of examples of good (best) practice. The provision of the corresponding recommendations and examples of good (best) practice, including their dissemination, will assist in informed policy-making with respect to:

(i) helping members of institutional governance bodies to identify strengths and weaknesses in the ESG Part 1 implementation and address these in institutional policies; (ii) helping decision-makers at national level (ministries of education) in identification of system policy priorities and measures for putting them into effect; (iii) helping decision-makers at supranational level in reformulation of the ESG Part 1 standards and pertaining guidelines; (iv) raising higher education community awareness of the successes and pitfalls in implementation of the ESG Part 1 standards" (Quote from the section C 1.3 in the project proposal).

The evaluation has been conducted by prof. Ellen Hazelkorn and prof. Bjørn Stensaker at two different points in time. As mentioned above, a midway evaluation of the first phase of the project was carried out in autumn 2012, while the overall evaluation of the project including activities conducted in the second phase of the project was conducted in autumn 2013. The data for the current report stems mainly from various reports, documents and analysis developed throughout the IBAR project period. In addition, some questions have been directed to the project partners to clarify details and various procedures.

Regarding its internal organisation, the IBAR project is organised in various work-packages (WPs) of which four was completed in the first phase (ending summer of 2012). These WPs

are particularly in focus in the first part of the evaluation report: WP5, WP6, WP7 and WP8. The evaluation committee was also asked to choose one of these for a more in-depth analysis, and following this an in-depth study was made of WP8. In phase two of the IBAR project, WP9, WP10, WP11, and WP12 were evaluated in addition, and our overall conclusions of the whole project are found in the final section of this report.

EVALUATION OF THE FIRST PHASE OF THE PROJECT

3. Research activities related to IBAR

While the IBAR project can be said to have a very practical and applied purpose, it nevertheless builds on a conceptual framework specially developed for the evaluation. Since the framework provide the lenses through which the activities and the results are interpreted, it is crucial that the framework is strongly linked to the research objectives, and that it also function as a relevant tool in the interpretation process.

Given the focus of the IBAR project, it is not surprising that implementation theory have been chosen as a theoretical point of departure for the project. The developed conceptual framework acknowledges the many difficulties and approaches in using implementation theory as a starting point. Both the top-down and the bottom-up approach to implementation has been taken into account, and as such the conceptual framework is balanced and very nuanced as to both the promises and perils of using an implementation perspective. Not least are difficulties noticed as to whether the ESG can be interpreted as "objectives", and to how concepts such as "barriers" and "implementation" should be understood. In general, the discussions held take into account a number of arguments and reflections underscoring the in-depth competence the research consortia possess in these issues.

The main problem that occurs following such a balanced discussion is, however, that the conceptual framework also becomes more blurred as to what the key dimensions and factors are when trying to analyse the "implementation process". One response to this situation seems to have been the emphasis on policy instruments, and the role and functioning of various policy instruments can play in various socio-political contexts (the instrument – context approach). This is a choice that indeed can be defended, not least, since it can provide more generalised information about possible barriers to the implementation of the ESGs. The problem with the policy instrument emphasis is that it provides few hints regarding the causality of events and practises found. For example, while legislation may be identified as a key factor – both as a potential enabler and a barrier to implementation – we are still left a bit puzzled as to *how* legislation can drive so different outcomes.

This challenge has not been ignored by the IBAR consortia. In the conceptual framework, issues concerning governance modes and policy contexts are provided as possible explanations for change. The end result is that we are yet again faced with more complex explanations – mainly because the ´context´ is not theorised – but rather taken for granted as a source of constant dynamism. Here, the IBAR project face a classic dilemma in the social sciences trying to balance the wish to build simple and convincing theoretical models while at the same time taking into account the complexities that tend to tear the very same models apart. We will end this report with some reflections as to how the IBAR project might deal with this challenge in our final recommendations. At this point, we acknowledge and praise the efforts made to develop a theoretical and conceptual framework.

Regarding the empirical design of the study, we find that the project have made some careful decisions as to the selection of institutions to be included in the study. Ownership, size and

academic profile stand out as the key selection mechanisms, and although this choice do not imply that the selection made provide a full picture of the higher education landscape in the countries in question, the selection is undoubtedly adequate for responding to the huge diversity found in these countries. The number of institutions in the study is also quite high given the time and resources available, and asks a lot of the partners involved in the project.

3.1 WP5

In this WP, which can be seen as a basis for several other WPs in the IBAR project, the internal quality assurance systems of the institutions have been mapped more in detail, both by developing country profiles, and by a comparative analysis. The comparative analysis starts out with a historical account of how quality assurance became "Europeanized" and on the creation of the ESG as such. An interesting point here, especially related to the theoretical starting points of the IBAR project, is that the emergence of internal QA systems are seen as being driven by the ESG. Here, it would perhaps be relevant to broaden the perspective and bring in the numerous governance reforms being implemented at domestic levels throughout Europe providing the institutions with more autonomy and stronger demands for accountability and responsibility. In this perspective, internal QA systems would be relevant as a tool for the institutional leadership to deliver on the accountability agenda. This is, of course, an issue that only can be explained empirically, and in the follow up of the internal QA systems, it would be nice to have more information on the specific functions that the internal QA systems play in the institutions. What are the characteristics of these systems? What are issues the reports addressing? What are the key criteria used for determining "quality"? etc. Here, we maintain that it is through a functional analysis of the internal QA systems, and not through formal references to ESG we can trace the possible impact of the latter at the institutional level.

As a pre-study of this more in-depth functional analysis, the comparative analysis provides a range of interesting findings and reflections. One finding is that in all institutions an internal system of QA can be found, but also that quite a number of these systems perhaps can be traced to other sources of inspiration than the ESG. Not least are models found in business and industry quite popular in the sample institutions, a fact that can be related to the inclusion of technical institutions. Since ISO models of internal QA can be quite easily combined with ESG, the question become why ISO models are chosen? In the comparative report, and elsewhere in the analysis made, the answer to this question is a lack of awareness of the ESG. This is undoubtedly a relevant explanation, but it is still a puzzle that some institutions then have high awareness on other international QA models available. Hence, while "unawareness" might suggest "introvert" institutions, the choosing of ISO models hints towards quite externally and perhaps even international oriented institutions that even actively have decided to either turn away from the ESG or to deliberately choose different options. The latter might suggest that the relevance of the QA models might be an issue to bring into the analysis. Again, a functional analysis of how the internal QA systems are designed, what rhetoric they serve, and the practises found on the ground might provide a more nuanced picture regarding the impact of the ESG. The adaptation of ISO models might, for example, suggest that for many institutions links to industry or business are far more important than the ESG. Adaptation of ISO models might also suggest attempts to streamline the institutions according to specific institutional objectives and strategies. The latter option would not least fit well with the finding that in most institutions studied, the implementation of internal QA systems and policies is characterised as a top-down measure.

A finding in WP 5 is the widespread use of student questionnaires as part of the internal QA systems at the institutional level. Such practises could of course be found in institutions also way before the ESG, and although one might find that the use of such tools and instruments are spreading, it is far more difficult to link them explicit to the ESG. When analysing developments in the use of student questionnaires closer, it would be interesting to study to what extent this instrument has be target to change in the period since the introduction of the ESG, and in what direction this change have taken the institution.

Regarding barriers, the comparative report mention the absence of legal levers and lack of incentives as something that is slowing down the implementation of the ESG. This is an interesting statement all the time the same report also find that most institutions already have an internal QA system in place. It is also an interesting statement with regards to the ESG as such. While the language in the ESG often indirectly encourages development, cultural change and trust, it is quite interesting if these objectives only can be achieved through the use of legal requirements and regulations.

3.2 WP6

This WP addresses an issue not directly focused in the ESG, namely access. However, the IBAR project has chosen to include access in the project mostly due to the impact access issues can be said to have on several dimensions of quality at the institutional level. While this choice can be defended, one could argue that if access should be included, the non-inclusion of a range of other issues should also be discussed (for example, attainment of students, internationalization, the use of new technology, etc.)? As also underlined in various reports and in the comparative analysis, access is an issue that is not entirely under the control of institutions. There are often national regulations in place that limits the autonomy institutions may have in this area, and as such one could also argue that the institutions are being held responsible for an area they – at least in a number of countries – do not have full control over. The most interesting discussion that one could perhaps take out of this is that one could argue for an extension of the ESG addressing not only institutions and quality assurance agencies, but even national governments. Of course, many institutions throughout Europe spend considerably resources and develop various strategies to attract students to their studies, but one could question why there is a particular need to address access issues as part of an "implementation" study of part 1 of the ESG. The recommendation found in the comparative report that institutions should take ownership of access implies indirectly a recommendation also for governments to transfer their current responsibility in this area to institutions.

The latter point opens up for another interesting discussion about the normative foundations of the ESG. The access issue articulate delicate questions around the roles of and power relations between national governments/ministries and higher education institutions. By recommending increased responsibility for access by institutions, one could argue that this suggestion fit well with current mainstream thinking about the importance of (more) autonomy for institutions. As such, the (technical) implementation study is being transformed into being a (normative) policy study with potential much wider political implications.

That being said, the WP on access does address a number of aspects of high relevance to institutional quality assurance. The discussion on the lack of institutional systems and routines for tracking and monitoring students in their system and beyond is, for example, an issue with high relevance for institutional quality assurance systems. Furthermore, outreach measures are also potentially important, not least since one could imagine that the institutional QA systems developed could provide much interesting information to be used in such outreach activities.

3.3 WP7

In the introduction of the comparative report of this WP it is noticed that not much research is found on the micro-level practises of QA processes at the institutional level, including teaching and learning practises, curriculum development and assessment routines. This is indeed a good observation. Although there is huge amount of research on this issues within the field of pedagogics the link between such core activities and QA is seldom made. In itself this fact underlines one of the challenges of QA – the potential de-coupling of QA from the very activities it is set to focus on.

As such, some of the findings in the WP are very interesting, not least the information on the changing roles of Examination Boards in some countries. While examination boards and similar bodies can be considered to be a standard requirement of higher education, their changing role is perhaps an indication that the organisation of primary processes in teaching and learning is changing, and that "old" and "new" forms of QA are becoming more integrated. If this is the case, one could argue that such integration attempts might have considerable impact on the culture within higher education institutions – something that might bring lofty concepts such as "quality culture" more down to earth transforming what often is seen as an individual activity into becoming an organisational responsibility.

Another interesting finding in the comparative report is related to the fact that there seems to be few if any distinctive patterns of organisation of formative and summative assessment within the institutions analysed. This might imply a lack of good links between quality policies, quality assurance, and teaching and learning practises of institutions. A consequence is not only that student-cantered learning approaches might suffer, but that the idea of learning outcomes is far from being realised at the institutional level, especially if the point of departure is to construct an alignment between learning objectives, activities and assessment. In many countries student assessment of teaching is a well-established practise often praised for its importance for boosting improvement. However, there are also quite a lot of studies showing lack of student interest in participating in these processes creating poor response rates and useless data. Here, institutional QA systems could play a pivotal role in addressing this problem. For the further studies in the project, it would be interesting to analyse more closely the role QA systems are playing for teaching and learning advancements. The question to be addressed is whether institutional QA systems also functions as tools for supporting innovation and the establishment of new practises (e.g., in advocating a learning outcomes based approach)? The fact that many assessment routines are more blueprints of official regulations at institutional and/or national level might have the effect that the overall design of study programmes becomes more fragmented; while learning objectives and learning activities may be linked to more or less ambitious quality policies of the institution, the design of assessments, and assessment practises, might be seen as a ´separate´ activity more following an administrative than an academic logic.

A third interesting finding in the comparative report, which could be further elaborated, is the apparent paradox between the institutionally reported robust and fair assessment procedures conducted by a committed academic staff, and the more critical student views on various assessment practises inside the institutions. This paradox is far from being novel, but could be explored more in detail in the second phase of the project. Not least would it be interesting to explore the role of institutional QA systems as a potential bridge between the interests of the institutions and of the students.

3.4 WP8

Developments in quality assurance reflect increasing trends for greater accountability and transparency in response to, inter alia, a shift in ideological support for public services including education, globalisation of the higher education market and increased student and public concerns about value-for-money and return-on-investment. Over time, concerns about quality and excellence have come to dominate higher education because its products (human capital development and new knowledge) are seen as essential drivers of social and economic development, and now, economic recovery. Given this shift, quality assurance is becoming less a function of institution enhancement than a factor of national – and hence – international competitiveness; in effect, criteria for self-improvement has given way to global benchmarking with national consequences. Strong linkages between systemic (EU and member state level) governance and institutional quality management are evidenced in the increasing pressure of "top down" drivers for quality management. In turn, some governments are using performance measurements/inducements to define and re-enforce quality. The challenge, however, is not simply getting the process and measures right (a technical problem) but ensuring that the system motivates the right behaviour (an alignment problem).

Within this context, this project seeks to examine a set of issues around how quality within higher education institutions is assured – by looking primarily at governance, leadership and management. The *Implementation Staircase* (Trowler, 2002, adapted from Reynolds and Saunders, 1987) referenced in the Westerheijden and Owen conceptual framework for the project, provides a good illustration of the complexity of policy adoption, adaptation and interpretation that occurs within any organisation. These patterns are reflected in each of the case studies. Nonetheless, a clear finding is the extent to which quality assurance mechanisms/processes are now firmly embedded within the fabric of all higher education institutions, and the extent to which the practices – taking account of national and cultural context – are broadly similar thereby suggesting the ESG is implicit if not explicit. The individual national case studies describe the involvement of Rectors/Rectors' offices, Deans, Heads of programme committees, and representatives of staff and students, in varying degrees, with the quality assurance process, ensuring and assuring the quality of study programmes, curriculum, learning outcomes, etc.

Yet, as quality assurance systems have progressed, they have taken on a life-of-their-own; there has been a "frenzy" of QA agencies and mechanisms in all countries which have placed a strong (undue) emphasis on process rather than content. At the same time, the use of national and global rankings schemes have been promoted in the widespread (yet largely unexamined) belief that rankings can (also) promote quality improvement. The legacy of rankings has contributed to the proliferation of metrics, such as student entry criteria, progression, graduation, employability and student satisfaction, as proxies for academic or educational quality. This emphasis may be due to this being the initial or introductory phase of QA or to a technocratic interpretation of quality as "accountability for results". The Polish report refers to "regulation", the Portuguese report talks of developments being "bureaucratic and requiring a lot of inexplicable work on the part of schools", and the UK report suggests the developments are a distinctly UK phenomenon; others propose the "new public management" framework.

Accordingly, the project describes the tension between collegial vs. managerial or "bottom-up" vs. "top-down" governance models as impacting on how quality of institutional activities is assured. However, this framework needs much further exploration. For example, it is not clear the extent to which the emphasis on process and procedure – on description rather than on a searching inquisitive approach – is simply the result of government policy or insistence rather than the way HEIs and academics have (also) chosen to interpret quality assurance.

More attention should be given to interrogating the observation that "centralised control management" is leading to a "lack of staff motivation, or inertia"; to what extent could this be explained as a tension between traditionalist and modernist views of higher education held (also) by the academy? Greater use of the "staircase" framework may facilitate a more critical interrogation.

Similarly, emphasis on structures and process leaves open the main question of "what is quality". Indeed, there is an assumption that if the processes work well, then quality follows. It would be useful to extend the discussion beyond simply asserting that the "development of a quality culture within institutions...is about academic values and bottom-up processes" to explore the extent to which the various institutional QA systems seriously interrogate questions of academic quality and performance. The introduction of quality assurance systems poses some real challenges for the academy which has heretofore relied largely on its own (peer) systems. Hence, this line of questioning stretches beyond HEI teachers having "sufficient pedagogical skills" to include reference to academic quality, academic/RDI expectations for academic staff, qualifications or staff development. Consideration could also be given to ensuring a more comprehensive feedback loop between teaching and research, ensuring that academic research actively informs teaching, and that students are part of this process.

As is said repeatedly in the case studies, higher education operates in a globally competitive environment. Many of the drivers for quality assurance emanate from the requirement of the market to be more attractive to international talent and investment. While there has been much useful critique of rankings and international benchmarking, their significance has been to place consideration of higher education quality within a wider comparative and international framework. This differs considerably from the Deming "Plan Do Check Act" mode of continuous quality improvement which is arguably *sui generis*. It would therefore be useful to explore the extent to which concerns about international competitiveness are understood within the institution, by the leadership and the whole academic community, not only as a driver of quality assurance/transparency tools but also the necessity of an institutional quality culture embraced by the entire community. How HEIs respond has implications – and recommendations – for supra-national and national agencies as well as the individual institutions themselves.

Finally, the various tables provide a wealth of information. Would it be possible to develop a more integrated framework – or a summary table – which can facilitate easier comparison?

4. Project Management

This is a complex project involving a large project team comprised of researchers from seven partner countries and research institutions, and led by the Centre for Higher Education Studies, Prague, Czech Republic, and a very large and arguably partially unknown group of interviewees/participants. The latter group comprises both short-term and a long-term target groups. The former is itself comprised of three parts: i) HEI governing bodies and/or persons responsible for and/or involved in QA internal mechanisms at 28 higher education institutions in the partner countries and 500-600 persons, and approximately 100 people from secondary education institutions in the respective countries; ii) academics in leading positions at all HEIs in every country to whom the project results will be sent after being completed; and iii) academic people and HE students in each of the partner countries. The long-term target group is comprised of representatives of national ministries and national QA agencies in every partner country; they will be contacted with respect to participation in coordinating seminars, and as receivers of project results and the Final Synthesis Report, which will be at the end of

the project lifetime. Contact with international organisation/institutions will be reached directly. The entirety of this group is perceived as difficult to *a priori* assess, as it is likely to involve both direct and indirect participation in the above events as receivers of information plus a level of snowballing. This complexity makes the management of the project critical.

Day-to-day management is overseen by the team at the Centre for Higher Education Studies. To help ensure good-coordination and partner engagement, every WP is led by and is the responsibility of one of the project partner institutions. In addition, project scheduling is sequential, with each WP to be covered within 5 months. Each development WP follows a similar pattern, starting with an opening seminar in which the details of work, including the final criteria guiding the research at selected HEIs, are agreed and the detailed structure of the comparative study (the main outcome of every development WP) settled.

Internal evaluation reports show continual progress with the exception of difficulties with financial reporting – an concern not to be overlooked. However, the project is, for the most part, running to time, as proposed in the original description. Of the 34 deliverables indicated, 18 actions have been completed, and two are under active preparation. The website is extensive, and provides solid evidence of a huge amount of work having been undertaken. The outstanding actions are due for delivery during 2013. There have been a few delays due to the transfer of the UK team from the University of Durham to the University of Strathclyde, and to heavy time commitments of the partners and/or the work schedule of participants, but these have been remedied by the project team itself, and no alternative intervention has been required. These time constraints have affected the full participation of all partners in the various seminars and led to some reorganisation of the institutional visits; some of this is inevitable given competing pressures on professor/researchers but it raises questions about an uneven workload and the ability of smaller teams to complete the requisite work. The project evaluation has been delayed for similar reasons – originally due October 2012.

Project management will need to intensify its efforts to ensure that all deliverables (Project Proposal, C2 pp37-38) are delivered in a timely fashion – as has already been alluded to with respect to difficulty with the progress report (p28). The co-ordinating seminars are a good way to ensure cohesion, but the range of topics covered is quite significant. National case studies presumably need to be completed in order for the comparative analysis to be undertaken – this requires good scheduling and synchronisation. These transversal elements constitute the added value of the project, and are ipso facto complicated. The project team acknowledges these difficulties, and says there has been, of necessity, some re-formulation of this aspect. As a consequence, the transversality elements will be considered "implicitly in the national reports" rather than separately. Likewise, the cross-sectoral focus – the relationship between secondary and higher education – will now be considered within WP12. It is difficult to tell to the extent to which the workshops have fulfilled the promise of a "seminar" rather than simply an updating of progress and actions. These issues will need to be tackled in the final book, which has already been outlined according to the interim report. This constitutes a valuable means to pull everything together, but requires significant management and intellectual coherence around the arguments lest it be simply a collection of individual papers.

Equally, it is important to ensure that the book and its contents are widely disseminated as opposed to simply published. Dissemination/participation at conferences should look beyond the organisations proposed (Progress Report, p11, 30); given the aim of the project to "make a wider influence on national level impacting ministries of education and quality assurance agencies", the project team should consider identifying the most appropriate national/EU policy fora, inter alia, meetings of the Directors General of Higher Education (DGHE),

EARASHE/UASnet, EUA, ESU, ENQA, EQAR, etc. The project report does acknowledge that attendance at such events might be more appropriate at "later stages of the project when some of the final results will be available" but interim action should not be ignored as it can yield useful and influential insights.

5. Summary and recommendations for the remaining project period

Some overarching reflections

Based on our reading and analysis of the research produced in the first period of the IBAR project, our joint conclusion is that the project is doing well, producing both interesting case studies of various practises at the institutional level, while also addressing more overarching policy issues through the various comparative analyses. The project partners deserve credit for having created an ambitious project, demanding much of the partners both concerning field work and analytical skills. Indeed, there have been challenges concerning project management, but in a large and demanding project such as the current one, this might be expected.

Theoretically, the project is well positioned within the field of public policy and higher education research. The theoretical and conceptual framework developed is updated and reflective, and do underline the many challenges associated with conducting "implementation" studies tracing European level policies down to the institutional level. The conceptual framework allows for complexity and non-linearity in dealing with these issues, not least by paying much attention to the policy context. However, the problem that the IBAR project faces as a consequence of this is also that the conceptual framework becomes more blurred as to what factors, processes and indicators they should look out both during data collection and data analysis. In trying to find a middle way between simple macro-models of "implementation" and complex micro-models of practise, the IBAR project have landed on policy instruments as a way to focusing the analysis made. We have much sympathy for this approach. When going through the various reports and comparative analysis conducted so far, we would nevertheless argue that it is difficult to find a consistent application and use of the concepts in the reports from the project. In general, reports are more focused on the specific research questions being targeted for each WP, and the comparative analysis within each WP is not conducted in a way that will make it easy to conduct further comparative analysis between the WPs.

That being said, we do think that the IBAR project have fulfilled a key objective of the study; to describe policy practises at the institutional level in the 28 institutions selected. Here, the IBAR project clearly illustrates the diversity found, both between countries and between institutions in the same country. As a consequence, it has not been difficult to identify a number of potential barriers to "implementation" although it is more difficult to assess which of these barriers that may be more significant than others, and how good/best practise can be stimulated. A risk for the IBAR project, as for the first generation of implementation studies, is that the project will produce very long lists of barriers and factors that in some way or another may have ´impact´.

While acknowledging the challenge in trying to deal with the situation, one could argue for the advancement of analytical models that could be both easier to apply in the further analysis, and are also easier to understand from an outsider point of view. While we would be careful in recommending a specific approach, we would like to draw attention to current research on ´institutional logics´ and similar approaches (see e.g., Thornton & Ocasio 2008)

where the macro – micro problem of causality is explained in terms of established patterns of activity rooted in both practises and policies which could pave the way for more simple analytical models, and a more structured approach in identifying barriers. This perspective should be quite easily combined with the current theoretical framework, including the focus on policy instruments and the implementation staircase.

The perspective of institutional logics could provide a cultural explanatory frame around certain policy instruments (the context) and how they might function in implementation, and would avoid the somewhat normative divide between ´affirmative´ and ´negative´ instruments. The institutional logic perspective offers a more consistent understanding of how organized behaviour is located in a broader social context, where some key mechanisms define the essential characteristics of the various logics found, including factors such trust. Hence, while the current instrument – context approach is rooted in the same understanding – i.e., that instruments are influenced by their context – it lacks an explanation for *how* contexts matters. Of course, we do acknowledge that it is not easy to construct the various institutional logics needed, but we do think that the IBAR project can find much useful information in the already developed national case studies. Not least, we do think that an institutional logic approach would be useful in the process where integrative analysis is to be undertaken *across* the different WPs. Our reflections here are still not offered as recommendations as we acknowledge the potential implications a change in the theoretical/conceptual framework might have at this stage in the project. For the upcoming book though, we would argue that there is a need to strengthen the links between the theoretical framework and the empirical analysis undertaken.

Recommendations

Based on our review of the achievements so far, the evaluation committee would like to make some recommendations that the project partners may consider for the remaining project period. To focus our recommendations our starting point is taken from section C 1.3 in the project proposal, i.e. that the IBAR project will assist in informed policy making with respect to:

    (i)   helping members of institutional governance bodies to identify strengths and weaknesses in the ESG Part 1 implementation and address these in institutional policies;

    (ii)   helping decision-makers at national level (ministries of education) in identification of system policy priorities and measures for putting them into effect;

    (iii)   helping decision-makers at supranational level in reformulation of the ESG Part 1 standards and pertaining guidelines;

    (iv)   raising higher education community awareness of the successes and pitfalls in implementation of the ESG Part 1 standards

Following this we offer the pointers below for consideration by the IBAR project partners:

- To provide useful information to decision-makers at the institutional level is indeed a challenging task all the time many of them seems quite unaware of the ESG altogether. Time and capacity to spend on such issues are probably scarce at universities and colleges. Information to be perceived as relevant and timely at the

institutional level may more likely be linked to other current issues that those addressed by the ESG. For the IBAR partners a possible way forward could be to present their findings not by having a focus on the ESG as such, but by taking the perspective of the institutions, and try to identify situations they are facing where the ESG may be of relevance. While producing good/best practise through examples are one of the objectives of the IBAR project, we would argue that good/best practise quite often is difficult to use because of different framework conditions faced by institutions. A possible way to deal with this problem is to identify a range of good/best practises that can be applied to specific situations where institutions are more offered a ´menu´ of choices rather that fixed solutions.

- The evaluation committee are aware that the ESG are entering a process of formal revision – effectively its next phase – and the current project would be highly relevant in this process. While we assume that the IBAR partners also are well aware of this revision process, we would urge the IBAR partners to be quite pro-active in providing feedback into the revision process, especially if it is able to bring forward observations on institutional practices, for good and ill. Seen in a democratic perspective, the ESG was originally developed mainly by a limited group of experts and professionals, and one could argue that the revision process should be more open for advice and recommendations from different stakeholders in higher education. Here, the IBAR project may play an important role not just in the form of giving ´expert advice´ but also providing a more public ´voice´ from the shop-floor on both the positive and the negative aspects of the ESG. As part of the process of developing a public ´voice´ we would argue for the need to go beyond the E4 group and the funders of IBAR, and to search for strategies that may give the IBAR project a greater outreach. Working through national ministries and other stakeholders at the domestic level could be one way forward as national actors often have developed their own networks and information arenas.

- While the IBAR project in principle is an applied research project, we would like to draw attention to the great potential the IBAR project also has to take on a more critical view as to the effectiveness and efficiency of the ESG as a policy instrument. In its design, the IBAR project has set out to identify barriers to the ESG, and in that process the IBAR partners should perhaps also ask whether the ESG is the (only) way forward. Here, we would like to urge the IBAR partners to examine the underlying ambitions and objectives of the ESG and discuss – based on the findings of the project – whether other policy instruments than the ESG might be relevant for the future. Can the ESG be combined with other instruments and measures? Can other measures replace the functions of the ESG? Since issues of access and the links to the lower educational levels are discussed in the IBAR project, this begs the question of where the limits of the ESG should be set? While expanding existing standards is a well-known phenomenon in both private and public sector, we would argue that more standards are not necessarily the best way forward.

- Another issue related to the one above concerns the content of the ESG as such. Currently the ESG contains prescriptions of behaviour and actions surrounding quality although the latter concept – not surprisingly – has been left undefined. However, standards are in many countries associated with academic standards, and the risk of the ESG approach, and maybe even an explanation for the unawareness of the ESG at the institutional level, is that process aspects also by academics are of lesser interests than the outcome of the process. While we are not suggesting

that the IBAR partners should enter into a process of trying to define quality, we would encourage attempts to re-think how current standards and guidelines could be formulated in a way that would be met with more interest and engagement by various stakeholders. Hence, in this perspective it may even be the ESG in itself that is the greatest ´barrier´ to a strengthened focus on quality issues.

- A final recommendation is related to the project management of the IBAR project. While we do see that the way partners have distributed responsibilities and tasks is creating involvement and a role for each project partner, it seems clear that this project management structure is also quite demanding for the participants with much time and energy allocated to various coordination activities. While we are not suggesting a change in the current set-up at the current stage, we would advise the IBAR partners to find ways to support stronger coordinated leadership in the remaining period. Such stronger coordinated leadership may be needed to ensure that key objectives in the project, especially the comparative aspects, are addressed, and that various project partners are delivering the input in a way and form that will make the overall synthesis possible.

EVALUATION OF THE SECOND PHASE OF THE PROJECT

This part of the evaluation considers the activities and outcomes associated with work-packages 9, 10, 11 and 12, and two draft chapters prepared for the forthcoming publication. The focus is on implementation and barriers within institutions, and also links with stakeholders and with the secondary education sector.

6. Research activities related to IBAR

6.1 WP9

Today, higher education quality is a concern for all stakeholders: it affects national geo-political positioning and pride; it has become a beacon to attract mobile investment and talent; it is the basis of institutional reputation and status, and for performance assessment of scientific-scholarly research; graduate capability and opportunities depend upon it; and the taxpayer is concerned that it is receiving value-for-money and a good return-on-(public) investment. Thus, the quality of higher education performance is no longer a matter for itself alone but for students and parents; professional organisations and employers in the public, public and third-sector; the wider community/society often referred to as the "taxpayer"; and local/regional and national government. Arguably, peer HEIs are also concerned because of the way in which concerns about quality can have a spill-over effect on other institutions. Accordingly, the involvement of stakeholders in the quality assurance mechanisms has now become both a matter of national policy and institutional governance, and sometimes both, depending on the particular country.

Hence, the project team rightly adopted a broader definition of stakeholders drawn from the management literature, and thus of stakeholder engagement with higher education. In doing so the team broadly (and correctly in this reviewer's opinion) interpreted the original work-package description which was titled "Quality and Employers Including Private Sector". This resulted in some different titling of the national reports (Slovakia and Czech Republic referring to employers, and the others using stakeholder) and some change to the research questions to embrace this wider perspective. However, some key issues about stakeholder engagement and the outcome of such engagement – such as the extent to which

employers'/stakeholders' viewpoints are taken into account specifically with respect to graduate profiles, learning outcomes, exam requirements, soft and entrepreneurial skill acquisition or in helping inform access or lifelong learning strategies – seem to have been lost in the process. This omission is perhaps inevitable in a comparative project of this size and ambition, but these questions do seem to go to the heart of the issue of stakeholder involvement – in other words is the emphasis on process or consequence?

The project team has identified some significant issues about stakeholder involvement – drawing attention to common practices and some big differences at both national and institutional level. This refers to the specification of which stakeholder group should be/is included, the balance and role of internal vs. external stakeholders, and the level of involvement. In general there is increasing emphasis on the role of internal stakeholders – usually referring to students which are the largest and most prominent stakeholder group. This can differ significantly based upon institutional type/mission; hence universities of applied sciences or professionally focused programmes are more likely to have greater external (business, industry and local community) stakeholder involvement than traditional universities. Usually stakeholders are conceived as individuals representing particular sectors rather than representatives of sectoral/professional organisations, although there were some exceptions, notably Latvia, of the HEIs engaging directly with the regional employers union in response to labour market concerns.

Stakeholder involvement in curriculum formulation or assessment remains a controversial topic and the report refers to this. This derives from concern that employer or regional/local community groups may not have "sufficient knowledge about the specificities of a HEI". Higher education operates in a very dynamic and increasingly globally competitive environment, and many stakeholders may not always understand the breadth and depth of these changes and the implications for the institution. Alumni may often remember their own time as students, and employers can often confuse (higher) education with training, and focus on short-term i employability requirements for "oven-ready graduates" rather than graduates having the ability to fuel and sustain career and personal development over a lifetime.

The report raises some essential issues about stakeholder involvement arising from the national case studies, inter alia: 1) Students are the most prominent stakeholder and are effectively ubiquitous in all countries but this hides the fact that "overseas and part-time students remain widely underrepresented" at a time when the latter cohort is growing in most countries; 2) The diversity of "stakeholder" remains, in addition to the abovementioned point, low although this does differ according to jurisdiction; 3) Stakeholder involvement may be perceived as tokenistic, with emphasis on process or questionnaires, rather than genuine engagement; 4) Choice of individual stakeholders too often relies on personal contact; 5) Involvement can be very time-consuming, with above and below the line costs for the individual and the institution raising questions as to how is/should this be recognised or rewarded; and 6) Stakeholders and HEIs often have very different understandings of the role to be played by the former. Having identified these issues, they remain to be resolved if stakeholder involvement is to be genuinely meaningful.

The report concludes with recommendations with respect to different roles for fellow academics and for social partners, and a discussion of quotas, and the use of feedback however the study raises broader (unanswered) questions. Would stakeholder involvement have been implemented without pressure from national policy/legislation or from QA/accreditation requirements? In other words, would HEIs have developed such protocols on their own initiative? How should the gap between stakeholder and HEI understanding of the roles and the issues be closed or narrowed or is this what gives it value? And, finally, after

all these initiatives and processes, what is the outcome of such engagement, in other words, to what extent can stakeholder involvement be shown to have improved quality?

6.2 WP10

Academic quality is measured primarily according to two main indicators: student and academic performance. Over the years, attention has focused on the former with wide-ranging group of indicators being used however increasingly attention is turning to the quality of teaching/academic staff – being a reference to qualifications and competence/preparedness. The ESG emphasizes the importance of teaching qualifications and competence as intrinsic to education quality. The EU also has recently intervened, publishing the first report of its expert team, chaired by the former President of Ireland, Mary McAleese. Entitled *Report to the European Commission on Improving the Quality of Teaching and Learning in Europe's Higher Education Institution*, the report makes three key points. First, the prioritization of research over teaching and learning, which has led to research being interpreted as the defining characteristic of academic excellence, needs a "sound rebalancing." Second, given the importance of teaching, academic staff must be helped to teach to a "high professional standard." And third, all higher-education institutions should embrace teaching as a core mission in order to "enable people to learn." Amongst its 16 recommendations, it suggests the introduction of a mandatory certified training for professors and other higher-education teaching staff, and the creation of a European Academy of Teaching and Learning.

Work-package 10 is therefore timely, providing good case study evidence as to how different jurisdictions assure the quality of teaching staff, measures for staff recruitment and appointment procedures, processes for ensuring sufficient pedagogical skills especially for bachelor programmes, skill development opportunities and measures for improvement especially in this phase of mass/universal higher education, etc. Its focus is primarily on national policy and regulations, and on institutional policies and procedures on the "presumption that teachers are intrinsically/personally motivated" as stated by the NL case study.

Accordingly, the comparative report looks at the extent to which national or institutional guidelines are the dominant factor regulating the quality of teaching/academic staff. The UK has the greatest level of autonomy in this respect, but even here the role of the QAA has increasingly placed academic performance under the spotlight. Most governments assert a basic minimum set of qualifications, but changing national and international circumstances have required greater attention to matters of recruitment, qualifications, assessment and training than might previously have been the case. The impact of the economic crisis is referenced with respect to Portugal but otherwise receives scant attention; likewise there is little consideration of the extent to which accelerating global competitiveness and/or national or global rankings, which over-emphasize research performance, has/has not affected our understanding of and standards for academic quality – albeit this point was noted by Portugal, Poland and Slovakia. There is no doubt that even in its more benign format, such as U-Map, comparing academic output in terms of publications, research income, patents etc. per FTE academic staff has become an important indicator of educational quality and international comparison.

The key question is, as the work-package seeks to uncover, how are HEIs responding and what types of actions and initiatives are they introducing in order to ensure academic staff are continually up-skilling themselves especially in light of the shift from elite to mass/universal participation. Many barriers identified could be described as "external" to the academics themselves; they refer to financial factors, privileging research over teaching, low student involvement, lack of consistent national or institutional policies, lack of standards, and lack of

one pan-European set of indicators. There is no doubt that the higher education environment is putting great pressure on academics, many of whom entered the profession at a time and in an institution which had very different expectations about performance. Making the transition can be very challenging for both the institution and the individual; a generational change may ultimately be required. But, what are academics doing to ensure that they are at the forefront of these changes? Could the academy reconsider how its own performance criteria, for example, privileges research over teaching?

The report makes some important recommendations, and in this regard it follows the tenor of the abovementioned EU report in recommending a Europe-wide accreditation model for university teaching. This is now being contemplated by many institutions as well as governments. There are also suggestions regarding financial and other incentives such as better promotional opportunities and career paths, staff development and training programmes, etc. However, there are also some lacunae. The economic crisis affects not just those who are unemployed but it also reduces career opportunities for those in employment. Institutional type, e.g. traditional university sector vs. universities of applied sciences, can have a significant impact on academic opportunities, motivation and attitude with profound effects on the higher education system as a whole. In line with a general shift from a narrow binary to a more diverse unitary system in many countries, there is a necessity to ensure that institutional type does not, unintentionally, create career cul-de-sacs affecting quality.

Further attention might also be given to the question of "who is (what does it mean to be) a good university teacher" and not just in the respondent's opinion. Is there an objective set of criteria rather than the more subjective terms such as passion, enthusiasm and openness which are referenced? How should academic quality be assessed and measured in order to resist the temptation to rely on simple/crude bibliometric indicators? It's also not evident that student satisfaction surveys are a sufficient mechanism, so in what other ways can this be done? There is reference to the need to stress linkages between education and research qualities, but how should this be done? In what ways can the impact of research on teaching, for example, be measured?

And finally, the section outlining "recommendations for institutional managers" references only the UK. Is this an error or are the authors making a specific point?

6.3 WP11

In this work package, the links between the ESG and institutional management and governance are explored more in detail. Two of the ESG standards relating to "information systems" and "public information" are taken as point of departure, and management practises relating to these standards are studied in all 28 case institutions, and across the seven countries in question.

The general finding of the investigations undertaken is that the institutions have invested considerable time and resources in developing internal information systems addressing the areas suggested by the ESG. Not all areas are as well covered as others, and most developed information systems are found in countries and within institutions were there are national requirements for collecting such information. Hence, it seems to be a close relationship between national laws and regulations and institutional activities regarding whether information is collected. Of the areas studied, it is pointed out that employability of graduates seems to be an area that is not well covered by institutional data gathering practices. The study also shows quite some divergence between countries and institutions on the traditions for information gathering. In general, the UK and the Netherlands stands out as countries with

a longer tradition for data gathering and for having more extensive institutional information systems.

With respect to information institutions provide to the public, the study also found many differences between countries and institutions. In general, it seems to be institutional self-interest that influences the selection of the information disclosed to the public. Hence, it is perhaps not surprising that all institutions provide information on study program offerings as a key activity, including intended learning outcomes of various study programs. Since little data is gathered on the possible employability of students after graduation, it is not surprising that relatively few institutions also provide such information externally.

One of the findings of the study is that information on teaching, learning and assessment procedures within the institution is mainly treated as "internal" information, and where the public as such is rarely seen as a target audience. This is an interesting finding as institutions seem not have understood the relevance of disclosing this information as a way to both profile the institution compared to others, and to prepare future students on how teaching and learning is conducted. In this way, institutions miss an opportunity to display how teaching and learning is conducted as a way to attract both students and interest from the general public.

For an external observer of higher education, the empirical findings in this work-package are hardly surprising, but the research conducted have much added value as it provide hard data and evidence in an area dominated by much anecdotal evidence, and single case studies. The comparative study is well written and informative, but lacks to include a more contextual perspective concerning institutional management systems. Given the relatively clear links between national law and regulations and institutional practices found in the study, it is somewhat surprising that not more attention is devoted to national policy-making and policy-initiatives as a frame for understanding institutional behaviour in this area. While we agree that many of the identified barriers to develop internal and external information systems – such as lack of institutional policies, insufficient participation of students and stakeholders, and lack of professional expertise in gathering and disclosing information – are relevant, they are still not sensitive to the fact that national authorities still have a dominant position in creating the context for the information gathering activities, and that the institutional interest in both gathering and displaying information may vary a lot from countries to country, and from institution to institution depending on their market exposure and self-interest. As such, this work package would have benefitted from taking into account the general governance context found in the countries, and how issues such as accountability and institutional autonomy is played out.

6.4 WP12

In the ESG there is no mention of secondary education, and as such, there is limited understanding for how quality assurance in higher education is conditioned by path-dependencies in various educational systems. As such, the fact that this work package addresses links between secondary and tertiary education, and how this might affect learner transition from one level of the educational system to another, is novel, interesting and policy relevant. The work package has tried to investigate this issue by using data from the selected 28 institutions in the IBAR study, and with additional studies undertaken in secondary schools that have links to these universities and colleges.

Since the point of departure of this study is not the ESG, the work package and the analysis undertaken are somewhat different from the rest of the IBAR project. In general, this work package is more open and explorative, and sets out to describe important policy initiatives in

the various countries that may influence the relationship between secondary and tertiary education, practises found at the two educational levels that addresses learner transition, and also what links and what sort of systemic communication that already exists between the two levels.

Key findings from the study are that there have been a lot of policy initiatives in this area in terms of curriculum change, not least with respect to the creation of national qualification frameworks. However, much diversity exist as to whether the transition from secondary to tertiary education is seen as challenging and problematic. Higher education institutions have, in many countries, developed many initiatives for promoting and recruiting students where secondary education is one of the key target areas. With respect to structural links between the two levels, the study discloses that QA procedures are quite different, and that in most countries studied, there is less developed collaboration (exceptions are the UK and the Netherlands).

The study confirms that the governance and funding of secondary and tertiary education respectively is a major barrier for collaboration, systemic interaction and for strengthening the mutual links. As such, this study also discloses the limitations of the ESG as it addresses and targets higher education institutions while at the same time ignoring the key part of the context surrounding higher education institutions, and influencing on the functioning of these institutions. At the same time, the study also show that the links between secondary and tertiary education is becoming more important, and that more policy interest is devoted to how such links can be strengthened in the future.

In the comparative study of this work-package a number of interesting and most relevant recommendations are made. First, the study demonstrate how current qualification frameworks need to take account of the differences between and the characteristics of the two educational levels and that the ambitions related to clarifying and emphasising learning outcomes to a greater extent should be seen as a result of more systemic integration and collaboration, and not something being isolated to individual institutions, and those responsible for the different levels of education in the NQF. Secondly, the study also demonstrates that QA perhaps needs to be more aware of and collaborate more across educational levels. Third, it also indicates that the scope of the ESG perhaps should be reflected upon, and this study should be of high relevance to those involved in the revision process of the ESG.

Increased collaboration between universities and secondary schools should, in principle, be of interest for both parties. At the same time, this responsibility can also be considered as yet another add-on to already existing expectations directed at these institutions. Given the system perspective used in this work-package, we would argue that while institutional responsibilities indeed should be underlined, the major barrier is perhaps still found at the national level, and dependent upon national initiatives. As rightly argued in the comparative report from this work package, the purpose and status of first-year study in higher education is seldom addressed throughout the EHEA, and as such, the most important contribution of this work package is the underlining of the need for more national – and perhaps even European – initiatives in this area.

7. Overall assessment and conclusions

In the midterm evaluation of the IBAR project, it was underlined that the project in many ways was doing well. Given the time frame and resources available, the project has been very ambitious, not least in data gathering, the range of topics being covered and the comparative

analysis. Nonetheless, our conclusion is that the project has succeeded in achieving its objectives. Through a number of reports and case studies, we now have considerably more systematic information about key practises relevant to the ESG in 28 institutions in seven different European countries.

At the outset of the study, a conceptual framework was developed based on insights from implementation studies combined with field-specific knowledge about higher education. Autonomy at different levels in higher education was seen as a considerable challenge to the technical "implementation" of the ESG. Due to this, the concept of translation or interpretation was considered as a more relevant way to describe the expected outcome of the study. Perhaps not surprisingly, the project has indeed found many "translations" in the various countries and institutions studied. The challenge of the project – as also underlined in our midterm evaluation – is to identify common denominators among the many translations done. How can the considerable diversity found in countries and within institutions be reported upon in a way that is also insightful and relevant to those with an overall responsibility for making policy and taking new initiatives in this area?

We are aware that the IBAR project will result in a book that is to be published by Sense Publishers, and where the whole project is presented in a more coherent form. We applaud this initiative, and think that such a book will be an important source of information for many stakeholders to the ESG and of the further development of European higher education. The evaluation committee has also seen drafts of chapters in the book that suggests that the ambition to pull treads and the different pieces of the IBAR project together have high priority. Based on what is currently available, we think that current comparative work found in the book is promising in that it emphasises the many "limitations" of the ESG, and that the functioning of the ESG need to be put into a larger context. Such limitations are related to the link between quality assurance and quality work in general, between institutional responsibilities and national regulations, between policy coordination in secondary and tertiary education, and between different parts of Europe. Whether these limitations also should be considered as barriers is a question for discussion. Consideration might also be given to addressing some outstanding issues raised throughout this report or acknowledging a further/future research agenda. The authors might also give consideration to designing an integrated comparative table, drawing on those used throughout summary chapters, to better highlight the commonalities and differences in a user-friendly way.

The ESG was initiated to stimulate to increased compatibility and transparency in European higher education, although the IBAR study may have demonstrated that there is still a long way to go before these objectives have been met. On the other hand, and although the ESG is far from known at the institutional level, it can be stated that it has created a vocabulary for discussing compatibility and transparency in higher education, and that perhaps this is an important achievement in itself. The IBAR study touches upon this issue when they in a draft chapter point to the need to include teaching staff in the process of assuring and developing quality. One possible interpretation of why the ESG is not known at the institutional level is that key stakeholders – teachers and students – are not really included in the ESG and engaged by it. Following the argumentation above, they have as a consequence no vocabulary for talking about the issues addressed by the ESG. The suggestion that teaching staff should be given room to experiment with their own "translations" of the ESG is in this respect a promising one, as it might also have important implications for the policy development in this area. While the implementation staircase can be useful for analysing policy initiatives, it still also serves as a real model for policy realisation in many countries. The emphasis on professional autonomy which is implicit in the suggestion on engaging teachers (and students) in quality assurance can in this respect represent a contrasting approach where several steps in

the implementation staircase can be eliminated. Such an approach is still dependent on further development and policy initiatives at the domestic level not least concerning accountability issues and the institutional autonomy – areas where the national policy level still play a dominant role. Here, we would like to repeat and refine our arguments from the midterm evaluation and point to ways in which the IBAR project can be relevant to current policy processes within and across the European Higher Education Area:

- IBAR has demonstrated the interdependence between national laws and regulations and institutional behaviour, and as such, the project should address how the ESG may "fit" into current governance challenges in higher education. What are the relevant policy instruments that can be linked to the ESG at various levels in the "implementation staircase"?

- IBAR has also demonstrated the limitations of the ESG in a number of areas, and the project should address these in ways that can be helpful to those currently revising the ESG. The evaluation committee is aware of the fact that results from the IBAR project have been forwarded to key policy actors within the European higher education area. This is indeed promising. Not least, the focus on academic staff and students may be inspiring points-of-departure for further policy initiatives.

- IBAR has also demonstrated the institutional diversity found through the universities and colleges covered in the study. For those with an institutional responsibility such diversity may be comforting but not very helpful in their attempts to develop their practices and approaches to quality assurance in a broad sense. As such, we strongly encourage that the IBAR project also provide specific examples of practises and initiatives that seem to work, and suggestions about how they may be translated to other settings.

- IBAR has drawn attention to emerging policy issues and concerns about quality. For example, one of the work-packages looks at academic quality, and issues of qualifications and competence. Another important issue is the relationship and transition between secondary and tertiary education, and how student preparedness impacts on quality. IBAR makes an important contribution in seeking to take a whole-of-education approach because for too long different levels within the educational system have been seen separately, and often served by different ministries.

- IBAR has highlighted the tension between emphasis on quality assurance processes and a deeper understanding of what is meant by quality. In this respect the project touches on different interpretations between national governments and institutions, and between different stakeholders. These differences are probably inevitable depending upon who is asking, why and the purpose of the question. This adds another layer of complexity to the project but perhaps the authors might comment on this aspect in the book.

Finally, we would also like to underline that the IBAR project has generated a lot of very interesting data which, we assume, has not been exploited to the maximum due to time and resource constraints. This data should make further analysis and research projects possible, and the evaluation committee would very much encourage such activities, not least because such initiatives also may provide data on how European higher education is changing.