Reaction to consultation for ESG Revision

IBAR team, 2013-03-24

Character of the ESG

Purposes and Parts I, II and III

We conceive of the ESG as ultimately aimed at improving the quality of higher education, in order give students, in the long run, the most valuable learning experience in a European context. From that perspective, the four purposes mentioned in the 'context' document make sense.

We agree with the statement in the 'context' document that: 'Quality assurance activities should ensure a learning environment in which the content of programmes, learning opportunities and facilities are fit for purpose'. We also agree that: 'Stakeholders however can view quality in higher education differently' (Brennan, Goedegebuure, Shah, Westerheijden, & Weusthof, 1992).

The ESG contribution to this ultimate aim is through articulating a set of expectations for the processes of assuring quality learning. From this perspective, Part I, the standards and guidelines for internal QAE, is the core of the ESG. Part II seeks to place the focus of external quality assurance on enabling Part I to function optimally. These aims must be kept in mind when revising the ESG.

We see value in keeping the two parts together in a single document. It might also be useful to keep Part III, on the quality assurance of quality assessment agencies, included in the same document, to safeguard the completeness of the system.

In relation to Part III members of the IBAR team formed opinions drawn from the findings of recent research (Stensaker, Harvey, Huisman, Langfeldt, & Westerheijden, 2010): the standards are rather lax while the procedure is rather rigid. The UK approach to stakeholders (as explained below) seems more mature in that respect, i.e. it is important that stakeholders' views are taken seriously (their influence on standards and curriculum aims), but it is up to the unit evaluated to decide how to ensure that. It is not necessary to prescribe the process in that regard, e.g. there is no need to require that students be members of external review teams for Part III reviews. This is relevant because '…the European Quality Assurance Register (EQAR) fosters coherence of quality assurance systems across borders to build confidence in European higher education' and that should be done through adherence to common criteria regarding quality of education, rather than through common criteria regarding quality assurance procedures, which are only a very distant proxy for quality of education.

On the use of terms: assurance, accountability and enhancement

The context document rightly maintains that: 'At the heart of all quality assurance activities are the twin purposes of accountability and enhancement.' However, in the sentences following immediately, the relationship between quality assurance and accountability seems turned around, when the bold printed definition of quality assurance (in a stark example of circularity) maintains: '…"quality assurance" is used in this document to describe all activities within the continuous improvement cycle (i.e. assurance and enhancement activities).' We would suggest the abbreviation 'QAE' as encompassing both quality assurance and quality enhancement activities. While agreeing that we can define terms to mean whatever we want, consistency of use of terms is an axiomatic requirement.

More focus on internal quality assurance

The 'context' document states: 'Quality assurance processes, in particular external ones, allow European higher education systems to demonstrate quality and better recognition of outcomes, and therefore help building mutual trust.' This puts the wrong emphasis: quality assurance begins internally, and the internal quality assurance is the foundation for all other quality assurance processes. Admittedly the results of internal QAE need to be made available externally to begin building trust, and external verification of the results of internal quality assurance is crucial in this regard. Without external validation, the difference between honest quality assurance and (dishonest?) marketing is not discernible for the general audience; otherwise distrust is created.

The Role of Qualifications Frameworks

Trust is indeed at the basis of recognition, but trusted knowledge of differences will not lead to (equal) recognition. Recognition in a European context also requires compatibility of degrees with the qualifications framework of the EHEA. By 2015 National Quality Assurance Systems are expected to take into account their national qualifications frameworks (QFs) and to incorporate achievement of learning outcomes as a main tool for the evaluation of quality. The EQF Advisory Group has pointed out that for the National Referencing Report every country has to describe the way in which their National Quality Assurance system is aligned with their National Qualification Framework. National Quality Assurance institutions are required to accept the Referencing Report. However there is no reference to this in the current version of the ESG. The EHEA-QF therefore ought to be mentioned in the ESG as a crucial supporting document.

The Tuning Process

Since the EHEA-QF remains very abstract for actors in higher education institutions, it would be useful to make mention of the operationalization of qualifications frameworks in national contexts with respect to the different areas of knowledge, with inspiration taken, amongst other initiatives, from the Tuning projects. Hence, the referencing to national QFs also stands as a point for incorporation within the revised ESG. Finally, since institutional quality systems are expected to provide student assessment on the base of student achievements of predefined learning

outcomes, institutions are expected to show in a clear and transparent way how they validate meeting such outcomes. This requires that the institution develops appropriate methods of assessment. This is particularly important in the case of 'soft' or 'transitional' learning outcomes.

Widening participation

Our research suggests that it would be helpful to refer to widening participation, especially when framing some of the ESG guidelines. It appears that in systems which convey automatic right of entry to higher education when a threshold standard is met, institutions feel they have limited degrees of freedom in their capacity as agencies and few powers to significantly mould national policy. However most systems recognise that the spread of entrants to higher education should broaden, even though views differ on how that could be achieved. At least in part the latter variation reflects institutional type and degree of localisation of catchment. Hence, the principle of institutional diversity, serving the needs of a more diversified student population in regard to access to higher education, should be observed in policy documents, such as the ESG, and, importantly, in day-to-day policy practice.

Developing closer linkages between secondary and higher education

Presently, the topic of secondary-higher education linkages is dominated by considerations such as recruitment, even though our research shows evidence of a range of practices and policies spanning a wider canvas. It is also a field which seems to operate, nationally and at institutional level, through a smallish subset of enthusiasts, experts and dedicated post-holders, with the two education sectors otherwise functioning without much coordination. Arguably for certain areas, such as counselling, curricular linkages and the needs of students who are disabled or disadvantaged (economically, socially), a much wider span of staff, from institutional leaders to subject practitioners, needs to be actively engaged and made knowledgeable. Spreading awareness of and sensitising one's attention to these issues institution-wide might further help in developing closer and more effective linkages between secondary and higher education institutions. Moreover, given that all participating countries of the EHEA are now required to have Quality Frameworks in place (see earlier section on this topic), the alignment and purposeful articulation of secondary and higher education curricula within, and (in the longer term) between, countries should be afforded greater salience.

Quality assurance of education and research

Whilst the IBAR consortium recognises that the ESG have not been designed to cover the area of research (from fundamental to applied, depending on the character of the higher education institution), our enquiries into institutional quality assurance policies clearly show the functional and managerial dichotomy between educational and research-oriented processes and activities. We see an opportunity for stressing

linkages between educational and research 'qualities' throughout the ESG where pertinent, especially as far as pivotal characteristics (curricula, staff workloads, learning outcomes) of Master and Doctoral studies are concerned. In this respect, we take inspiration from the Portuguese case in our studies, whose quality agency has added the following standard to the ESG in their auditing framework: 'Research and development: The institution adopts mechanisms to promote, assess and enhance the scientific, technological and artistic activity appropriate to its institutional mission'.[i] It calls for 'Mechanisms for articulation between teaching and research, namely on student contact with research and innovation activities from the first years'.

Stakeholders in quality assurance processes

Including stakeholders' views in education quality work enriches the conceptualisation of quality by including in the standards, criteria, and processes of teaching and learning elements that may help graduates function better in relation to the needs of different stakeholders (economic and social). Representation on councils is the most often prescribed form of institutional involvement of stakeholders in the majority of IBAR countries (Czech Republic, Latvia, the Netherlands, Poland and Slovakia). However, this may not always be the most efficient method, occasionally leading to resistance and thus to 'tokenistic' representation without real influence. Our studies noted cases of tokenism with respect to both students and to employers.

On the whole, the case studies are fairly positive about physical representation of stakeholders. There are very few formal barriers to stakeholder representation in decision-making structures and processes relevant to education quality work in the countries in the IBAR project. There were, however, different interpretations of which categories of stakeholders (beyond students) should be involved, at which institutional levels and in which committees or procedures. The diversity of stakeholders seems to be too low in some cases, giving voice to only a few of the many categories of alumni, professions, regional public partners, and regional or national private sector partners and employers. Similarly, the diversity of levels and committees/procedures where stakeholders' opinions feed into institutional decision-making also seems to need further broadening in some cases.

At the same time, our research shows the need for more innovative ways of involving stakeholders' points of view other than through council seats. For instance, the UK practice of requiring assurance from higher education institutions that they are taking viewpoints of stakeholders into account without prescribing any particular mode of doing so, leaves room for autonomy and innovation. More imaginative strategies are needed to involve points of view of currently under-represented students (e.g. international, adult and part-time) and to help external stakeholders (employers, professions) to be involved in institutional quality activities. In such innovative policies, incentives (not necessarily monetary, but also symbolical recognition) should also be given attention. Even without additional means it ought to be possible to give students prompt feedback about actions taken on the basis of their evaluations. Prompt feedback, showing students that their opinions are followed-up with action, is one form of incentive and could thus help improve student involvement in quality assurance.

Looking at the findings concerning stakeholders presented above, we recommend that:

1) The statements in the standards mentioning stakeholders should be retained.

2) Attention in the guidelines of the ESG supporting these standards should turn away from formal representation of stakeholders to serious consideration of stakeholders' points of view.

   a) In internal QAE, higher education institutions should elicit viewpoints from an appropriately broad array of external stakeholders in their feedback about quality of education. Depending on the orientation (more academic or more professional), the balance may be more on external academic viewpoints or on viewpoints from the economy and society. Students of different categories should be asked for feedback about their current educational experiences, and alumni for their insights into the value that has been added by their study to their life and (early) career.

   b) External quality assurance should investigate how higher education institutions fulfil this responsibility. Representation on councils is not sufficient. For some categories of stakeholders (non-traditional students, employers, professions, SME employers) it is not efficient, and sometimes it is not legitimate in the eyes of academics. In short other methods for eliciting their feedback may be more effective.

   c) The practice, found in some cases in an IBAR country in Central and Eastern Europe, of involving local and regional governments as stakeholders is only warranted if these public bodies operate in roles concomitant with other stakeholders (for example in their role as employers of nurses or teachers), but not in their role as authorities *per se*.

3) At the European level, there might be room for more showcasing of good practices of genuinely involving diverse categories of stakeholders, in different roles and for different purposes (from curriculum feedback in self-evaluation processes, to strategy setting in a board of trustees). Such good practices should be explored, especially at the institutional level, to counteract possible negative local cultures. EUA and EURASHE might be the most appropriate actors to undertake such a task, for instance in connection to the EUA's quality culture projects.

4) The issue of organising sufficient incentives (financial and/or symbolic) for external stakeholders' participation ought to be given attention.

Internationalisation

The ESG are meant to be an instrument in the development of the EHEA. As such, internationalisation should be an essential element. The Portuguese agency for quality added a third standard to the ESG regarding Internationalisation[ii]: 'The institution adopted mechanisms which allow it to promote, assess and improve its international cooperation activities'. More generally, continuing attention is needed to QAE arrangements for international students.

Ethics

With the availability of the Internet and new technologies the problem of plagiarism and other types of fraud has become evident and unfortunately quite widespread. The ESG should be more explicit regarding this issue, namely in Standard 1.

Information provision

It is vital that the institutional information on quality is relevant and trusted. Several countries in the IBAR study have introduced standardised information which institutions are expected to supply publicly. The UK has introduced a standardised information set which institutions must supply to a national agency. More generally European countries might agree voluntary data sets which they make available on their own or through central websites and which feature as a topic in external reviews. To promote enhanced internal QAE, institutions should be encouraged to make best use of the substantial data sets which they commonly assemble. Showcasing good practice might stimulate enhancement, such as the databases available through the Netherlands Studychoice123 website.

Enhancement

The preceding point, regarding institutions availing themselves of their own substantial data sets, draws attention to the importance, in ensuring and managing quality, of enhancement. There needs to be clearer recognition that in the enhancement model, quality is driven by institutions. By definition this entails a need to safeguard institutional autonomy and academic freedom, and in austere times to ensure that attention is paid to a workable balance between costs and benefits. Valuable insights may be gained from a consideration of the Quality Enhancement Framework (QEF) currently operating in Scotland (Land & Gordon 2013).

References

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[i] The full standard is:

Reference 4 – Research and development: The institution adopts mechanisms to promote, assess and enhance the scientific, technological and artistic activity appropriate to its institutional mission.

The research and development policies of the institution include, namely: - Mechanisms for institutionalisation and management of research

- Mechanisms for articulation between teaching and research, namely on student contact

with research and innovation activities from the first years

- Mechanisms for economic valorisation of knowledge;

- Procedures for the monitoring, assessment and enhancement of human and material

resources allocated to research and development, of scientific, technological and artistic

production, of the results of the valorisation of knowledge and of the results of

articulation between teaching and research.

[ii] Reference 10 – Internationalisation: The institution adopted mechanisms which allow it to promote, assess and improve its international cooperation activities.

In the ambit of its internationalisation policies, the institution defined procedures to promote, monitor, assess and improve international activities, namely those in relation to:

- Participation/coordination of international education and training activities;

- Participation/coordination in international research projects;

- The mobility of students, teachers and other staff.