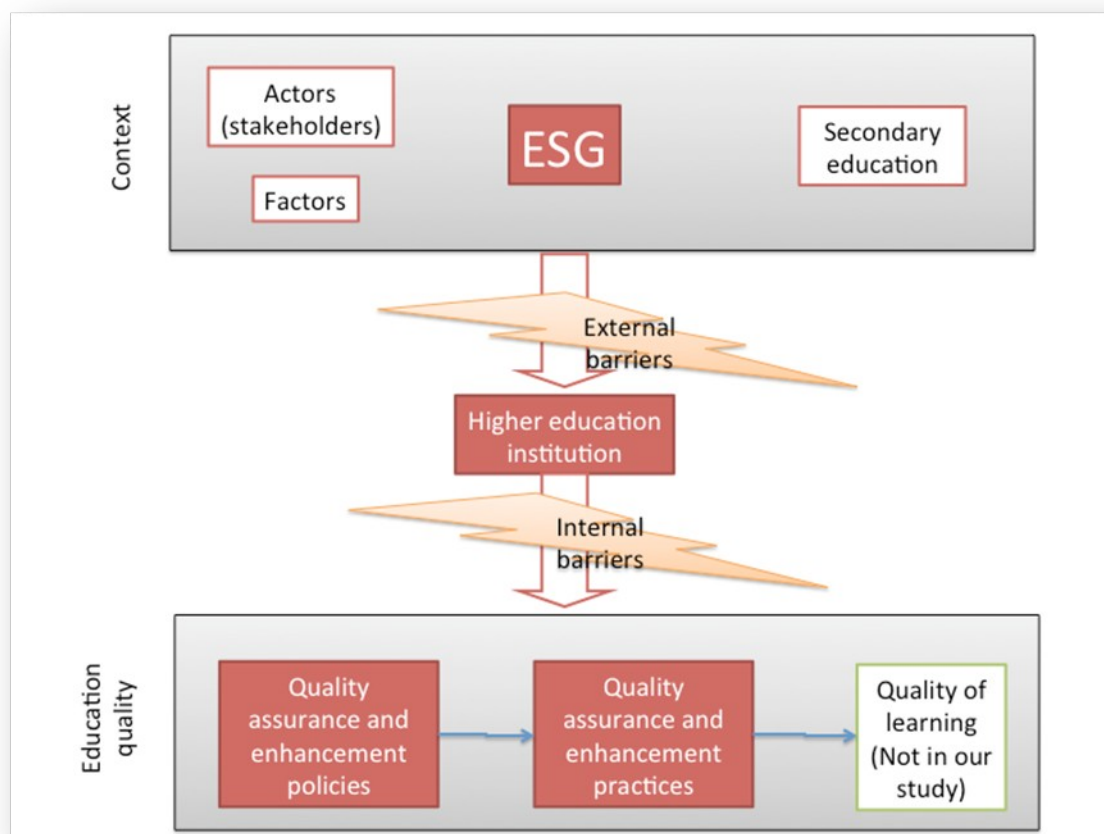


# 1 Conceptual Framework for IBAR

Informally summarising the aim of the project, we want to find out which barriers might exist that hinder higher education institutions to



implement the *European Standards and Guidelines for quality assurance*, Part 1, in their internal practices. We focus on practices, i.e. actually existing processes and structures, rather than on policies as written down, as the **dependent variable** of our study. The relevant practices are: teaching and its associated processes from making resources available for teaching (staff, lecture halls, equipment, etc.) to student assessment and awarding of diploma's or degrees, to quality assurance and enhancement of the teaching process.

We conceptualise the chain of events between the ESG as they were published and quality practices in higher education institutions as a process of policy implementation. Simple models of policy implementation assume that the 'arrow' between a written policy and its implementation is non-problematic. However, that has been discovered not to be the case since at least the 1950s: all kinds of circumstances, structures and processes affect how a policy is implemented. We will problematize the implementation 'arrow', while keeping it intact as a principle, by highlighting a number of elements relevant for the ESG, as part of the Bologna Process:

1. We see policy implementation as what happens between policy expectations and (perceived) policy results (Ferman, 1990), inviting the comparison between the expected and the achieved (de Leon, P., 1999). Such a definition implies a dual character of our study led by the concern to explain as well as to affect what happens, the latter through giving the policy recommendations (cf. Hill & Hupe, 2010).
2. Educational issues figure prominently among the themes of implementation studies (Saetren, 2005).
3. Policy implementation takes place in a multi-level, multi-actor environment; actors have positions and interests in this complex social system that affect how they view, use and implement the ESG.

4. Higher education institutions are complex organisations in themselves, with peculiar structures and action principles (esp. institutional autonomy, academic freedom).
5. The Bologna Process is an international policy-making process in which one of the policy axioms is that diversity is one of the strengths of European higher education, implying that some degree of flexibility is intended in the implementation of the ESG.
6. Quality is an object of policy with its own peculiarities.

Various sets of theoretical 'lenses' are needed to understand these issues. First, there are approaches that focus on **policy implementation** as such. The characteristics of **policy instruments** can be seen as part of this strand of theories. Next, the issues of the multi-level, multi-actor system and of the higher education institution as an organisation may both be analysed through different variants of **organisational theories**, both of a general nature and specifically for higher education organisations. The additional complexities of **European policy-making** in the Bologna Process, and of **quality and quality assurance** are treated in dedicated collections of literature. Next to theoretical considerations, these sets of literature will also contain empirical studies, whose findings and conclusions include actual factors that empirically have proven to be important. We hope to mine the literature for concrete 'barriers'.

These sets of literature give rise to five sub-documents. Some early notes on them are included below, to be elaborated by different authors.

### ***1.1 Barriers to implementation of the ESG***

Before we go into the literature, however, we must problematise the term ‘barrier’ so easily used in the title of our project: under which circumstances and why are factors ‘barriers’ in the many steps between official adoption of the ESG in Bergen, 2005 and their application in the 28 higher education institutions across Europe we are studying?

We take a policy-centric view in this discussion: the principle is that the ESG should be implemented by higher education institutions as they were intended by the policy-makers at the meeting in Bergen, 2005.

(Questioning if there was a clear intention at all, is part of the sub-document on European policy/the Bologna Process.) If implementation is not exactly as intended, the basic inference model is that there must have been barriers preventing this and our task is to uncover those barriers. We will look for barriers through the different theoretical lenses mentioned above, but the point here is that those theories may indicate factors that are important—sometimes in a positive sense, sometimes negative. The factors themselves are neutral, and, paraphrasing Shakespeare for Ray, ‘only our thinking makes them’ negative or positive. The negative ones are called ‘barriers’, but maybe the same factors could be turned into ‘enablers’, or other enablers might be found in the theories and empirical findings that could offset the negative impact of barriers.

Once the term “barrier” has been clarified, we are in position to concretise what we mean by “examples of good practice” which also figure among the project goals. Our approach, drawing from Veselý’s study (2010), begins from the observation that apart from “good practice”, relevant literature also recognises terms “best practice” and “smart practice”. The three terms are used either interchangeably or with

differences in meaning, as there is no terminological consensus in place. Examples of good/best/smart practice are subject to research termed “best practice research” (BPR), also comprising good and smart practices. BPR aims at improvement in functioning of an institution, public or private, on the basis of utilising certain functional mechanisms of the other institution that appears to be more successful. Utilisation of examples of good practice through BPR entails the following steps: 1) Analysis of the target site (institution wanting to improve) to find out what works and what doesn't. 2) Identification of the exemplar, i.e. the mechanism helping to deliver comparably superior results (examples of good practice) elsewhere (another institution as source site). 3) Explanation how, why and under what conditions the exemplar works at the source site. 4) Emulation of the exemplar at the target site (Vesely, 2010).

In the main, we argue that successful emulation of examples of good practice requires more than hearsay. Basically, the emulation through BPR should take place as a result of description and explanation of the exemplar's workings, which is done by means of a case study. Moreover, for the emulation to be successful, knowledge of contextual factors at the source site as well as the target site is of the essence.

### ***1.1.1 Implementation theory***

As suggested, the assumption underlying our enquiry into the ESG is that central-level policy objectives hardly remain unaffected in the process of implementation because of the interplay of factors including discretionary influence of front-line policy deliverers. This assumption draws from the bottom-up theory of policy implementation. Unlike the orientation of top-down theory on central level, dominant piece of legislation, and clear objectives enacted

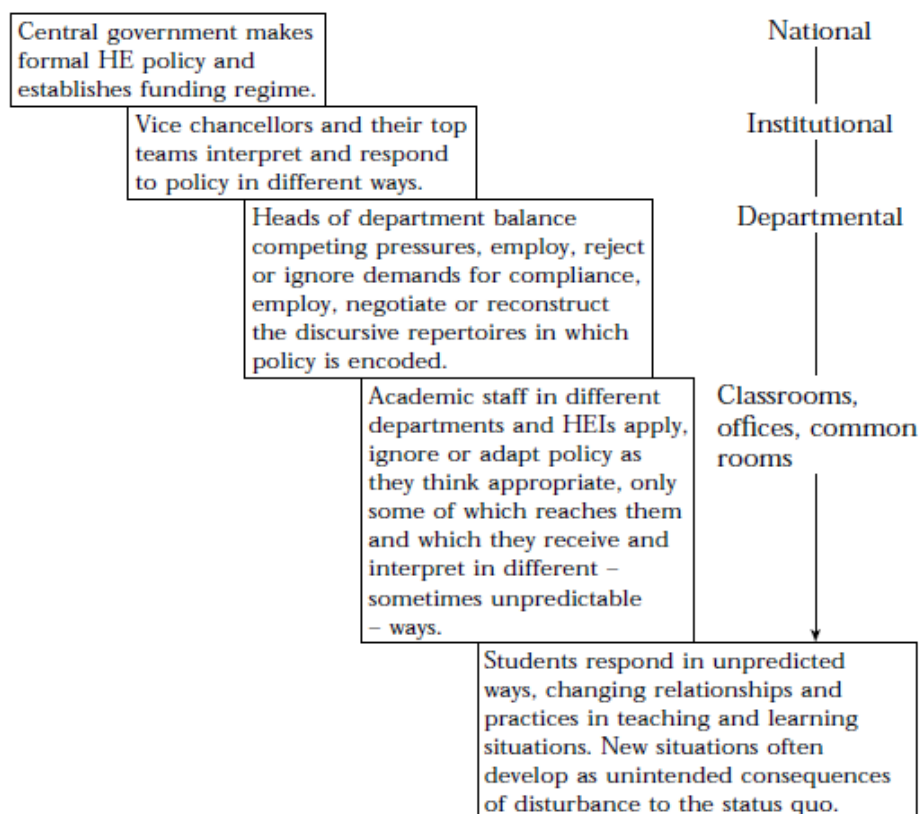
through command-and-control regulations (Matland, 1995; Pülzl & Treib, 2007), the bottom-up perspective can be characterised in three main ways. First, the focus is on the motives and actions of local implementers as opposed to central bureaucracies. Second, the attention is given not solely on policy goals but rather on the problem which a policy is designed to address. Third, the bottom-up perspective seeks to describe implementation processes in decentralised settings through actors' interactions (Schofield, 2001).

Based on these theoretical propositions, the bottom-up perspective put forward the analytical reorientations, which subsequently became accepted in implementation literature. These are: acknowledgement of the central role of front-line staff in shaping policy outcomes; supplementation of a focus on single policies regarded as inputs into the implementation process by a perspective regarding policy as the outcome of implementation resulting from the interaction of various actors; and increasingly widespread recognition of linkages and networks between a number of actors within a particular policy domain, cutting across the policy formulation/implementation stage (Jann & Wegrich, 2007). Perhaps the biggest contribution of the bottom-up theory is lending credence to argument that the very factors which top-down theorists urge must be controlled are at the same time the factors that are inherently difficult to bring under control, as, in reality, implementation is a continuous process of interaction with a policy that is changing and changeable because of being implemented by actors who are inherently difficult to be managed (Hill, 2005). As a result, barriers and tensions between the actors variously positioned on the implementation chain are likely to occur.

In foregrounding the notion of "barriers" in our work, we are making the assumption that implementation is problematic and liable to influence, probably by multiple factors. Implementation theories of the type useful in understanding individual and collective behaviours in university contexts (as opposed to the formal and highly theoretical work associated with game theory) invite considerations of power, culture and identity. Stensaker and Harvey (2010) argue that accountability schemes (and ESG should be recognised as such a scheme) may appear at first glance as essentially "technological" but in fact conceal power struggles concerning the future development of higher education. Policy which reaches the borders of an institution already embodying a particular vision or set of aspirations must then be understood, interpreted and acted upon according to the norms of that institution. Policy makers are unlikely to be able to make anything except the broadest recommendations about how policies might be implemented in the real, and often messy, context of universities and so externally-generated policy must be introduced, mandated and almost certainly re-defined.

Stensaker and Harvey (2010) argue that the way in which higher education institutions deal with environmental developments, including the development of international quality assurance schemes, that foreground accountability "is fast becoming one of the greatest challenges faced by institutional leadership". For this reason, senior managers are likely to take a keen interest in the way that such policies are implemented in their institutions and may seek to carefully manage their meaning. The cultural norms and practices of individual institutions will determine how successful managers are in shaping these messages (Alvesson, 2002) but in any organisation (not just in universities) there is

often a gap between policy initiatives mandated by managers and the reality of implementation on the ground. Reynolds and Saunders' (1987) "implementation staircase" offers a plausible picture of the ways in which policy is interpreted and the multiple possibilities for what Tutt (1985) calls "unintended consequences".



*The*

*Implementation Staircase, from Trowler, P (2002), adapted from Reynolds and Saunders, 1987*

This model does not imply that staff at any level of the organisation are necessarily acting in a deliberately obstructive way (although of course obstructive behaviours are always a possibility) but merely that policy implementation is enacted at different levels of the organisation and requires interpretation-in-practice at those levels. The relative power of individuals and groups at different levels to influence the detail of how policy is enacted will also be determined by organisational culture and norms. A key question is whether the outcomes of these interpretations



lead to improvements in quality that may or may not have been intended by the policy makers and shapers both internal and external to the institution and who, crucially, decides what improved quality might look like within the context of the organisation.

### **1.1.2 Policy instrument theory**

Characteristics of the policy instruments play a role in the implementation process. Defined as identifiable methods through which collective action is structured to address a public problem (Salamon, 2002), policy instruments provide an analytical basis for enquiries into implementation processes (Howlett et al., 2009), with the implication that the non-existence of systematic knowledge on policy instruments is the real missing link in the theory and practice of policy implementation (Salamon, 1981. In: Vedung, 1998). Utilisation of policy instruments in studying policy implementation re-orientates the enquiry from focus on policy content to policy components. It also provides a stronger analytic basis for unpacking policies empirically as well as for theorising about policy design and implementation (May, 2003). The orientation on the study of implementation processes through policy instruments can be subsumed under the alternative approaches/theories to policy implementation (Winter, 2003, 2006).

In policy implementation literature, this orientation is accounted for in *the instrumental approach to policy implementation* (Howlett, Ramesch, 1995, 2001; Howlett, et al., 2009). The instrumental approach has been described as “an orientation in the social sciences, in which the issues discussed concern the way persons or public organisations purposefully influence societal process . . . [involving] questions concerning the

conversion of policy intentions into administrative actions” (De Bruijn, Hufen, 1998: 11). More concretely, Howlett and Ramesch (1995) clarify the approach as follows:

The instrument-choice approach to policy implementation begins from the observation that, to a great extent, policy implementation involves applying one or more of the basic techniques of government to policy problems. These basic techniques ... are variously known as *policy tools*, *policy instruments* ... Regardless of whether we study the policy implementation in a top-down “design” fashion or a more traditional bottom-up administrative one, the process of giving form or substance to a [government] decision always involves choosing one or several tools from those available (157-58).

The central assumption of the instrumental approach is that policy instruments individually structure policy activities (content) and produce policy effects, thus giving a more precise insight into factors driving the policy processes and long-term patterns of public policy-making (De Bruijn, Hufen, 1998; Howlett, 2000).

In general terms, the major benefits of the instrumental approach to policy implementation are threefold. First, by its application, any policy can be disaggregated into functional units (policy instruments) through which it is put into action, regardless the perspective from which policy implementation is studied. Second, such disaggregation allows for more in-depth and empirically verifiable study of implementation processes through the instrument rationale, application (functioning), and effects than in case of policy treated as one monolithic block. Third, attention paid to policy design helps to ascertain politics of goal formulation and instrument choice, which makes it possible to establish links between means and ends of a given policy. As May suggests, “one key lesson for

policy design is to fashion instruments and implementation approaches (means) that are consistent with the policy intent (ends). Otherwise the policy is working at cross purposes” (2003: 228).

Study of policy implementation through policy instruments is pertinent to the area of education (McDonnell, Elmore, 1987). In the sector of higher education, the importance of utilisation of the instrumental approach to policy implementation has also been recognised and called for. As Gornitzka, Kyvik, and Stensaker argue, “If old policy and reform instruments such as central planning ... are abandoned by governments, there should be a more thorough investigation of the kind of measures that have replaced them” (2002: 418).

In line with the orientation of implementation analysis on policy instruments, efforts were made to account for instrument variety. More specifically, they concerned construction of parsimonious yet comprehensive typologies that would allow comparisons across time, area, and policy domain (Hood, 2007). Several typologies of policy instruments have been constructed, with more up-to-date contributions by Vedung (1998), Bardach (2000), or Salamon (2002). With the differences in scope and level of detail owing to the author’s take on the subject (Hood 2006, 2007), the existing typologies converge on recognising three archetypes of policy instruments, i.e. *regulation*, *economic means* (funding), and *information*. Regulatory and economic policy instruments typically come in an affirmative and negative variant. To illustrate, the economic type of policy instruments may come as subsidies, grants (affirmative variant) and/or as taxes or fees (negative variant).

Based on Birkland's (2005) overview of the existing typologies, the three archetypical categories can be gainfully extended by three other major types of policy instruments relevant for an enquiry into the ESG implementation. These are: *capacity building* and *learning* instruments along with policy instruments based on *informal procedures*, such as personal (e-mail) correspondence. By the combination of six major instrument types totalling 38 ideo-typical policy instruments (with affirmative and negative variants for regulatory and economic instruments), we arrive at the typology used for our enquiry (see ...).

### **1.1.3 The Bologna Process as European policy-making**

The Bologna Process revolutionised higher education in Europe—and beyond (Westerheijden et al., 2010). The discourse on higher education reform has changed from being (almost) exclusively national to being driven by a European-wide process in which 47 countries are involved. Nevertheless, the Bologna Process is a process into which the countries entered voluntarily and from a sovereign position: it is an *inter*-national process based on a Declaration, not a *supra*-national one based on e.g. competencies of the European Union. This implies that the most important drivers for reform of higher education remain located at the state level; without a national agenda attuned with the Bologna Process, compliance rather than in-depth reform seems to occur (Westerheijden et al., 2010).

What one can observe, however, is the vast number of changes that have swept over Europe's higher education since the 1980s with sometimes hurricane intensity. Over the last quarter century, a state of flux is the only real common denominator. There is not a single European higher education system where no significant change has occurred. In

many (West European) countries a series of reforms already were underway in the 1980s and many current reform initiatives have their origin in this time period. The changing role of the state vis-à-vis higher education institutions (i.e. in the form of enhancing institutional autonomy and stressing quality assurance and accountability) are well-known themes in the last two decades. This has convincingly been put forward in Neave's (1988) article on the rise of the evaluative state, OECD studies such as their Education Policy Analysis 2003 and Eurydice's 2000 study on over two decades of higher education reform.<sup>1</sup> These 'early' reforms covered many areas, including the structure of higher education, management and control, financing, quality and evaluation, course planning, access, student financial aid, internationalisation, and teaching and assessment (see Eurydice 2000). In this respect, European higher education has been going through a long period of reform. For Central and Eastern Europe, of course the Fall of the Wall in 1989 was the largest event since World War II, and ushered in a period of rapid and deep reform, also in higher education (see among many others: Altbach, 2000; Amsterdamski & Rhodes, 1993; Cerych, 1995; Hendrichová, 1995; Hüfner, 1995; Westerheijden & Sorensen, 1999).

Yet in this large flux, the declarations of the Sorbonne in 1998 and of Bologna in 1999 created a major watershed in European higher education. Voluntarily and based on inter-governmental initiatives (rather than through supra-national channels) a large and ever-increasing number of

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<sup>1</sup> According to the Eurydice 2000 study *Two decades of reform in higher education in Europe: 1980 onwards*, one of the most significant reforms observed has been the increased autonomy for higher education institutions, especially universities, in most European countries and the move away from the 'interventionary state' towards a more 'facilitatory state' (Neave & van Vught, 1991). At the same time, this has meant new forms of control over the higher education institutions—policy developments can be paradoxical (Paradeise, Reale, Bleiklie, & Ferlie, 2009).

countries began to cooperate across Europe to make their higher education systems more compatible and collectively more competitive in the world. Moreover, the Bologna reforms have triggered—or have been used in—other reforms. As for example *Trends IV* rightly argued (Reichert & Tauch, 2005):

The reform wave in European higher education seems to go even further and deeper than the Bologna reforms themselves. In some countries “Bologna” is used to introduce reforms that are actually not part of the Bologna Process. Many higher education acts were established in the 1980s and the 1990s. Since then they have been amended, while the Bologna Process has been used as a form of “spring cleaning”

We should not fall into the trap of viewing the implementation of the EHEA or promoting European higher education abroad as end in themselves (Rogers, 2008); they are means to further strategic goals in society. Besides, in achieving results and impacts other instruments and reforms (national as well as European) play a role as well, besides the action lines directly associated with the Bologna Process (e.g. visa policies for foreign students, reforms in the framework of the Lisbon agenda, or national reforms and policies). Methodologically, that raises the question of how much of the ensuing change in the higher education systems in the 46 EHEA countries should be ascribed to which instrument—if to any instrument at all. Besides, making these policy measures a success depends not only on parliaments proclaiming laws, or on the higher education ministries sending out circular letters, but also on cooperation by other government agencies such as the funding councils and quality assessment agencies, by other organisations in the higher education system (higher education institutions, recognition agencies, etc.) and by

individuals (students and graduates) (Uusikylä & Valovirta, 2007; Witte, 2006). Implementation, factors enabling or hindering implementation (barriers), and impacts should therefore be studied by taking into account other actors' contributions to the policy (Gazendam, 2006).

#### **1.1.4 Quality and quality assurance**

Whilst it is hard to argue against the idea of "quality" as a universal aspiration, many commentators have noted the complexity in defining high quality and in operationalising approaches to the management of educational practices that might deliver a high quality experience. As previously noted, the task of creating meaningful definitions and practices is almost always devolved across a number of sub-groups in institutions. The quality agenda is not one that is usually perceived as neutral by academic staff, who have been most likely to view assurance activities as burdensome bureaucracy (Newton, 2000) and to adopt sub-optimal coping strategies to satisfy accountability requirements without paying any real attention to quality improvement. The adoption of sub-optimal practices could be seen as a deliberate leveraging of diffuse power to destabilise an unpopular policy, but as Lipsky (2010) argues, such strategies are also necessary for workers "at street level" who have to create bridging practices to fill the gaps between the expectations of policy makers and what is actually possible at ground level.

The focus on accountability that permeates the quality assurance discourse has challenged notions of academic identity and opened up areas of academic practice to increased scrutiny. "Quality" and quality assurance management can be understood as analogous to modernisation and professionalisation of academic cultures and roles. Morley (2003)

argues that, in the UK at least, academic cultures have substantially internalised the quality agenda so that enormous attention is paid to league tables, national quality assurance agency reports and other mechanisms by which higher education is routinely judged by external stakeholders. Whilst there are considerable implications for the relative power of different actors, both institutional and external to the institution, in this new reality, she suggests that the power struggle has already been won, primarily by the alignment of university finance with performance indicators. In other national contexts, there may be different levers and different patterns of adoption or resistance.

Discussion on ESG: what are ESG doing: Quality assurance and/or quality improvement? Mainly quality assurance, we think. [This serves as introduction/lead over to:] → **Content analysis of higher education institutions' quality assurance policy documents (=WP5)** is needed to see if and how the ESG are affecting them.

Qualifications frameworks: QF-EHEA/EQF: they are implemented in parallel to the ESG. ... some explanation from **CHEPS** team (using Independent Assessment Report ...)

Note: there is money for implementation of qualifications frameworks from Structural Funds for Central & Eastern European countries: is this an external factor affecting implementation of the QF-EHEA and of the ESG? (It is not an a priori but an empirical question: do they profit from each other, or is QF-EHEA hindering the ESG?)

Quality assurance policies affect power relations in the organisation ('managerialism' on the rise?) and in the system (between ministries and



institutions). We want to emphasise that for smooth operation of higher education, because of its professional nature, trust is crucial! Uncertainty about consequences of quality assurance leads to low trust, leads to risk avoidance, leads to low quality enhancement. Perkins (Harvard) → factors needed for change to happen in education! 'Mild accountability'.

Several studies document the dissolution of trust in the academe and the increasing orientation of quality assurance policies on accountability (Massy, 2003; Enders, 2005; Amaral, 2007; Harvey & Newton, 2007; Huisman et al., 2009; Amaral & Rosa, 2010; Stensaker & Harvey, 2010). At its most basic, accountability refers to answerability for one's actions or behaviour (Dunn, 2003) through the system of external controls that might be formal or informal (deLeon, L., 2003). Promoting external controls, accountability inhibits responsible proactive commitment and professional discretion based on justifiable levels of trust. In effect, it can be argued that "[a]ccountability is a form of quality control. We avoid the really bad, but we have to forego the really good" (Lucas. In: Gregory, 2003).

With regard to quality assurance policies, accountability of the academe to the state as the major provider of funds is thought to have been achieved by implementation of external, mostly accreditation-type of policy measures. As a rule, these measures executed by government-designated agencies have led to the dissolution of trust, although trust is considered the basic precondition for the effectiveness of most organisational processes (Harvey & Williams, 2010; deLeon, L., 2003). The paradox is that at least some of the accountability-oriented external policies on quality assurance have been initially launched to promote

trust, however, with the term itself left unspecified (Stensaker & Harvey, 2010).

Stensaker and Gornitzka (2009) ground the notion of trust in theory by identifying two theoretical perspectives on trust – *rationalist-instrumental* and *normative (cognitive)*. *The rationalist-instrumental perspective* is based on the assumption that individuals follow the logic of consequentiality. If not induced to do otherwise, individuals pursue their self-interest and maximise their own utility. Others can be trusted to the extent that there are effective mechanisms of control. From this perspective, trust is established through the existence of independent actors and auditors, assigned to check the quality. Trust will develop as an effect of control. Procedures, standards, and norms, established by the auditors, function as proxies of trust. *The normative perspective* starts from the assumption that relative stable sets of norms, values and rules underpin social relations of actors involved. Such norms are internalised by all actors because it is socially unacceptable not to follow them. Trust is then established on the basis of the existence of norms and social obligations to act appropriately in order to account for ones' behaviour. With regard to higher education, from this perspective, trust is achieved when higher education institutions, over time, demonstrate accountability through the results and outcomes produced. The reputation of a given institution then becomes a proxy for trust. In policy practice, the two perspectives tend to blur and overlap, as actors will normally not engage in “blind trust” but will use a combination of calculative and norm-based judgements (Stensaker & Gornitzka, 2009).

## **1.2 From Concepts to questions**

The concepts must be operationalised into questions guiding the WPs. The questions for the WPs in the project proposal are mainly descriptive: *What* has been done? *How* have things been done? The conceptual framework may help to ask the *why*-questions (or, thinking of barriers: *why not?*).

The questions can be used for document analysis, surveys or interviews—depending on the subject and on the national/local availability of sources. That last step in the operationalisation is left to the research teams locally. But all should use the same set of questions to ensure comparability of the case study reports.

We propose that in the development of the questions for all WPs as much as possible the same barriers will be investigated. There may be good reasons not to investigate a certain barrier, but then the WP-developer or the local research team must justify why they want to deviate from the general pattern.

A full list of possible barriers must be derived from the next, further developed, versions of the conceptual framework, but examples might be as follows.

### **1.2.1 External barriers**

1. Is national legislation and further regulation in place?
2. What have quality assurance agencies done for the implementation of the ESG?
3. Which other policy instruments have been applied nationally: economic, information, capacity-building (e.g. Bologna-experts)?

Are they restricting or enabling the application of ESG in the higher education institutions?

- a. What is the national policy regarding the qualifications frameworks (QF-EHEA and EQF)? Is there a connection with quality assurance/ESG in the national understanding of policymaking?
4. Are external stakeholders (e.g. employers) supporting or hindering the application of the ESG in higher education institutions? How?
5. Which other external factors are hindering or supporting the application of the ESG in higher education institutions: general economic situation (crisis), employment chances for graduates, ... ?

These questions at the national/system level must be studied through document analysis at this level, and could be checked in interviews with central-level institutional staff members in case study institutions.

### **1.2.2 Internal barriers**

1. What are the authorities / freedoms of 'street level' teaching staff in the higher education institution regarding quality assurance, curriculum renewal, etc.? [Let's look at the higher education institution bottom-up!]
2. What are the authorities / responsibilities of middle level managers / leaders (faculty Deans, Heads of Departments) and representative bodies at these levels regarding quality assurance, curriculum renewal, etc.?

3. What are the authorities / responsibilities of senior managers / leaders and representative bodies of the higher education institution regarding quality assurance, curriculum renewal, etc.?
4. What is in general the decision-making culture in the institution: strongly bottom-up or strongly top-down?
5. How strong or weak are, in general, the administrators in the higher education institution: e.g. do they regularly take initiatives for changing institutional policies?
6. How are internationalisation and quality functions organised in the higher education institution? (e.g. through administrative offices under president/vice-president, as senate committees, decentralised in faculties, etc.)
  - a. Who in the higher education institution is scanning the environment for developments like the ESG?
  - b. Did the higher education institution find out about them by itself, or rather through national agencies (e.g. the quality assurance agency)?
  - c. How do internationalisation and quality functions communicate? Are there direct links or only through central leadership? [Supposing that the ESG are in the middle ground between these two functions]
7. How regularly are curricula reviewed in this higher education institution, as a rule?

- a. How strongly is the quality function (quality office, senate committee, etc.) involved in vetting reviewed curricula?
8. Do 'street-level' academics and/or decision-makers in the higher education institution see the ESG as impacting on curricula?

These questions are the object of document analysis supported by interviews at the institutional and unit (faculty) level.

## ***References***

