

# **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.

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. The project is running to time, and should result in some considerable publications and insights.

This evaluation examines WP 5, 6, 7 and 8 and overall project management; each section is discussed in turn. In an effort to aid the project's agenda, it identifies some lacunae which could strengthen its conclusions. Recommendations are contained in the final conclusion but broadly embrace the following two issues:

- 1) By taking a normative approach as its starting point, the project may overlook some of the more searching questions about QA and specifically the ESG. There is, for example, a tendency to consider the process and degree of implementation of the ESG as itself a measure of quality. This bias towards a functional analysis of how the internal QA systems are designed, what rhetoric they serve, and the practises implemented leads the project team to identify barriers in terms of system failures, e.g. insufficient or ineffective implementation of student questionnaires, weak links with stakeholders, assessment types and processes, and so on. In this respect, it would be timely for a study of this magnitude and significance to ask some deeper questions about quality and the purpose of quality assurance or quality management systems. Such inquiries could be facilitated by the various conceptual frameworks referenced in the methodology or elsewhere in the papers – but which otherwise appear to have been dropped when trying to analyse the “implementation process”.
- 2) The breadth of the project presents its own difficulties. The number of institutions is high given the time and (human) resources available, and asks a lot of the partners involved in the project. It requires considerable project management and synchronisation in order to undertake the important comparative component of the project. A good conceptual framework is required to help sort and order the meaning of the different experiences so that the project can meet the kind of outcomes expected given the project team's expertise.

## 2. Introduction

The current report contains the mid-term evaluation of the IBAR project. This mid-term report covers the activities and results from January 2011 to June 2012. The key objectives of the IBAR project is the starting point for the evaluation, although not all objectives can be expected to have been met in the time period covered. As such, the ambition of the current report is to provide reflections and advice to the project group regarding how the specified objectives of the project can be achieved within the remaining project period. Hence, the report is designed as a formative input to an on-going project.

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).

Regarding its internal organisation, the IBAR project is organised in various work-packages (WPs) of which four so far have been completed. These WPs are particularly in focus in this evaluation report: WP5, WP6, WP7 and WP8. The evaluation committee have been asked to choose one of these for a more in-depth analysis, and following this an in-depth study has been made of WP8.

The evaluation has been conducted by prof. Ellen Hazelkorn and prof. Bjørn Stensaker. The data for the current reports stems mainly from various reports, documents and analysis developed in the first period of the IBAR project period. In addition, some questions have been directed to the project partners to clarify details and various procedures.

### 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/ministeries 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-centered 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 both be easier to apply in the further analysis, and that also are 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 as 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 matter. 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 than 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 proactive 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 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.