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Accreditation Models in Higher Education

Experiences and Perspectives

ENQA Workshop Reports 3

Foreword

In November 2003, ENQA organised in co-operation with its Italian member agency, Comitato per la Valutazione del Sistema Universitario, a workshop on *Accreditation Models in Higher Education – Experiences and Perspectives* in Rome, Italy. The intention of the workshop was to understand the principles of the various accreditation methodologies and models in higher education, to demonstrate examples of possible good practices on the basis of country case studies, to discuss and evaluate the usefulness of accreditation activities, their strengths and weaknesses, and to make recommendations for the future.

Accreditation is a complex concept and wide-ranging as a practice, without one single denotation. In fact, national adaptations and practices vary considerably. Exactly for this reason, the workshop proved to be a successful forum for learning from each other in terms of good accreditation practices and experiences. In addition, the dialogue on the nature, purpose and objectives of accreditation, and an examination of the weak and strong points contributed to a greater understanding of accreditation in a European context. Moreover, the workshop considered the differences between accreditation and evaluation, finding that both of these modes of operation aiming to assure quality in higher education contain a developmental aspect in them.

The Rome workshop contributions have been collected to this workshop report. Unfortunately, because of limited space, the individual contributions by the workshop guest speakers have had to been shortened. However, the full version of each of the workshop presentations, including the PowerPoint presentations that are not included here, can be found on the ENQA website (http://www.enqa.net/workshop_rome.lasso). The report is structured so that it begins with three general articles on accreditation. This is followed by seven country cases and finally, a conclusion on the contribution of the workshop.

It is my hope that this report will be of use to many, enhancing further the benefits of the workshop by continuing the sharing of ideas and fruitful discussion on accreditation, its methodologies and practices. Through the publication of this report ENQA wishes to emphasise its support for accreditation as an important method of the overall concept of quality assurance.

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1 On Accreditation

1.1 The Power of Accreditation: Views of Academics

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Introduction

The paper draws on many years' experience of analysing external evaluations of quality and standards. It is important to note that quality and standards are not the same (Harvey and Knight, 1996). The paper will draw on the views of those who have been involved in accreditation in Britain and in North America. Both countries have had forms of accreditation for decades. These views will, at a surface level, help to identify the perceived benefits and problems of accreditation. However, those same views, when critically deconstructed, will also raise fundamental issues about accreditation.

Overall, the view underpinning this paper is that Europe is rushing precipitously into accreditation and that the approach being taken is based on naïve views of what accreditation is and what it can achieve. More fundamentally, there is an underlying but unspecified and unexamined set of taken-for-granteds that legitimate accreditation. Accreditation is neither neutral nor benign; it is not apolitical. Quite the contrary, the accreditation route is highly political and is fundamentally about a shift of power but a shift concealed behind a new public management ideology cloaked in consumerist demand and European conformity. The paper intends to demonstrate this.

Also, accreditation is not a process somehow set aside from audit, assessment, or standards monitoring such as external examining. Accreditation uses methods and has purposes that overlap with audit, assessment and external examining.

Accreditation

Before exploring these issues, some orientation on what accreditation is and how it relates to other external processes. Accreditation may be of programmes or institutions. Accreditation is the establishment or re-statement of the status, legitimacy or appropriateness of an institution, programme (i.e. composite of modules) or module of study.

Institutional accreditation

Institutional accreditation effectively provides a licence to operate. It is usually based on an evaluation of whether the institution meets specified minimum (input) standards such as staff qualifications, research activities, student intake and learning resources. It might also be based on an estimation of the potential for the institution to produce graduates that meet explicit or implicit academic standard or professional competence.

Institutional accreditation or re-accreditation, in Europe for example, is usually undertaken by national bodies either government departments or government-initiated agencies that make formal judgements on recognition. In some countries, with a total or preponderant public sector higher education system, there is little need for institutional accreditation, *per se*, but there is a growing need for a mechanism to validate 'upgrading' of non-university higher education institution (such as colleges, polytechnics, Fachhochschule) to university status, as has happened, for example, in the UK and Sweden.

In the United States, with a large private sector, accreditation is a self-regulatory process of recognition of institutional viability by non-governmental voluntary associations.

The focus of US institutional accreditation has changed. Initially accreditation was a device 'used by a college or university to convince other institutions that its students and courses should be accepted by them, and vice versa' (Murray, 2002, p.1). It evolved into a form of public accountability providing assurances 'to those outside the higher education community as well as those inside it that the institution had capacity to offer its programs' (Murray 2002, p.1). Furthermore, despite the voluntary nature of the process, there has been a funding link through eligibility for federal aid. Increasingly, there has been a shift in accreditation to focus more on outputs, in particular, student learning outcomes.

In Canada, the government of Ontario has established The Post-secondary Education Quality Assessment Board to examine applications to offer degrees from institutions other than the provinces' publicly-funded universities (INQAAHE, 2001a). Institutional accreditation, especially initial recognition, tends to be more prominent in countries with a significant new private higher education provision, such as those in the Americas and Eastern Europe.

Delegates at the international seminar *The End of Quality?* accepted that institutional accreditation was useful, in theory, to ensure the integrity of higher education – including international integrity. However, the context and stage of development of higher education within any system is a key variable in determining the importance of accreditation. The more new (private) development the more, it was thought, is the need for institutional accreditation.

Programme accreditation

Programmes may be accredited for their academic standing or they may be accredited to produce graduates with professional competence to practice; usually referred to as professional accreditation.

Accreditation (and re-accreditation) of courses in North America tends to focus on professional areas. About 14 different non-governmental voluntary associations recognise provision in institutions that have been found to meet stated criteria of quality. These accreditors judge whether the study programmes appropriately prepare graduates to enter a profession. Accreditation of programmes in the USA is, thus, linked to providing a licence to practice but is separate from it.

This is very similar to the role played by the professional and regulatory bodies in the UK, who also control access to the profession by making accreditation of the programme a prerequisite for graduate entry. Perhaps more draconian than their US counterparts, some bodies in the UK set and grade their own examinations and require a period of work experience before registering graduates as full professionals (Harvey & Mason, 1995).

The newer accreditation in Eastern European countries such as Hungary, the Czech Republic and Slovakia has, at least initially, opted for programme accreditation in all academic fields (Westerheijden, 2001). This appears to be designed principally to provide academic rather than professional accreditation in the wake of the Soviet era. The mushrooming of new programme accreditation proposals in some Western European countries, linked to bachelor-masters conversion, also predominantly appears to be academic accreditation. Instead of accrediting institutional processes for the creation of bachelor-masters courses based on existing provision, it seems some countries intend to accredit every new programme.

Licence to practice and accreditation

There is a distinction between graduating from an accredited programme and having a licence to practice. In some cases, these are coincident, especially for graduates from some postgraduate programmes. Sometimes an undergraduate degree in a specified subject is a prerequisite for progression to a postgraduate course or diploma in that area. In some cases *any* good undergraduate degree is a pre-requisite for further professional training; for example, in law in the UK there is a one-year postgraduate conversion course that non-law graduates take before joining the law society postgraduate qualification programme.

In many professional areas, graduation from an appropriately accredited academic programme is a

preliminary step and full professional certification, and thus a licence to practice, follows only after some period of work experience. In some instances, such as teaching, a licence to practice may be virtually independent of studying on an accredited programme. In many US states, obtaining a teaching licence is not dependent on having an accredited teacher education degree.

Validation and accreditation

When examining subject or programme accreditation it is important also to distinguish between validation, revalidation, accreditation and re-accreditation. Validation refers to internal processes in institutions. So, a validation process would ensure that a new programme fulfilled internal institutional criteria. Validation is the internal acknowledgement of the establishment and legitimacy of a programme. In some countries, such as the UK, the introduction of new programmes of study and new component modules in some areas, such as social science, is solely an internal process. In others, new programmes require external approval, from an agency or government department and if they are in 'professional' areas they may need additional accreditation. In other countries, there are limits on new developments, for example, in Norway, if a subject area is already well-established at an institution, new programmes up to 90 credits (1.5 years) can be opened.

Revalidation is the formal renewal of that acknowledgement. Most institutions have processes for periodic review of existing programmes of study and of their constituent modules. This process may be linked to external accreditation but is often an internal process within permitted parameters and, usually, conforming to explicit guidelines. External re-accreditation may be 'delegated' to the internal revalidation procedure (usually on the condition that the internal procedure uses external advisors).

Accreditation is the formal or official external recognition of a (validated) programme. This may be for funding purposes or it may be registration of the programme as a provider of professional education (which thereby signifies that graduates have attained a level of minimum professional competence). The external accreditation agency may be a national agency or a discipline-specific agency or a regulatory or professional body with delegated authority. Re-accreditation is, thus, the formal renewal of an accredited programme.

Accreditation criteria and decisions

Accreditation has been described as a public statement that a certain threshold of quality has been achieved or surpassed (Campbell *et al*., 2000; Kristoffersen, Sursock, & Westerheijden, 1998). However, one might argue that accreditation is more about minimum standards (be they academic, competence, service or organisational (Harvey, 1999)) than about the quality of the process. None the less, accreditation decisions are, or at least should be, based on transparent agreed, pre-defined standards or criteria (El-Khawas, 1998; Sursock, 2000).

Accreditation is a binary state, either a programme or an institution is accredited, or it is not (Haakstad, 2001, p. 77). However, the absolute of this binary state is blurred or softened by a 'holding' decision that permits, in effect, progression to accreditation. This ranges from accreditation subject to further action, through probationary accreditation to permission to reapply for accreditation.

Focus of accreditation

Accreditation may be focused on inputs, process or outputs or any combination of these.

Programme accreditation tends to focus on inputs such as staffing, programme resources, and curricula design and content. Sometimes it addresses the teaching process and the level of student support. Occasionally programme accreditation explores outcomes such as the graduate abilities and employability. In some cases, the medium of delivery might be the key focus, especially when it differs from the norm.

Institutional accreditation tends to focus on the overall infrastructure, especially the physical space, along with the IT and library resources and the staffing. It might address this from the point of view of the overall student learning experience. In addition, institutional accreditation might focus on

financial arrangements and viability, governance and regulation and administrative support. Where an institution offers distance or on-line learning, the medium of delivery might be a focus of accreditation procedures. Increasingly, the US regional institutional accreditation agencies are focusing on outcomes and effectiveness.

In principal, though, rather than the input-process-output focus, accreditation might be based on recognition that the institution has in place appropriate control and monitoring processes to ensure satisfactory quality and standards. However, identifying appropriate mechanisms is normally viewed as an auditing function distinct from, but possibly contributing to, a formal process of accreditation of an institution. However, the term (quality) audit is not restricted to an exploration of organisational process.

Rationale

Rather more complex is the ostensive rationale for accreditation. Accreditation is primarily about control of the sector; this is much more explicit in accreditation than in other external quality processes such as audit, assessment or external examining. Although accreditation involves compliance and indirect accountability, its main function is to maintain control of the sector and the programmes offered. Improvement is a spin-off from accreditation processes, which some agencies emphasise more than others. Institutional accreditation is designed to ensure that institutions of dubious merit do not become established as *bona fide* higher education institutions. Accreditation also monitors the sector to ensure that accredited institutions continue to fulfil the expectations of a university or college. A key concern is the need to control 'for-profit' organisations, whose motivation is different from the public sector.

In many countries, with a predominant public sector higher education system, there is little or no institutional accreditation *per se*, but there has been a growing tendency, fuelled by new public management ideology, to require institutions to demonstrate accountability for public funds. Although not the same as accreditation, in the ex-

treme, failure to exhibit satisfactory accountability can result in the 'de-accreditation' in the form of closure or merger of unsatisfactory institutions, as has happened in the further education college sector in the UK.

Accreditation at the programme level is also about control. In Eastern Europe, academic accreditation of programmes is about ensuring adequate standards, a function fulfilled, in effect, in the UK (and some other Commonwealth countries) by the external examining system. Although the latter is not accreditation *per se*, unsatisfactory examiners reports might lead to the closure or sanctioning of a programme either by the institution management or as a result of other forms of external monitoring such as external subject review or academic audit.

Professional accreditation is even more about ostensive control. It is about an external agency maintaining control of a subject area that links into professional employment, especially where to practice requires certification separate from academic qualification. Although such bodies provide guidelines with which successful accreditees comply, these guidelines are manifestations of the organisation's control of the sector. Sometimes this control is grounded in legislation, such as the British General Medical Council's regulatory function. Sometimes, despite having no regulatory power, the professional body is so well established in the profession that it is impossible to gain work in some areas without it.

Accreditation methods and mechanisms

Accreditation involves a set of procedures designed to gather evidence to enable a decision to be made about whether the institution or programme should be granted accredited status. The onus is on the applicants to 'prove' their suitability; that they fulfil minimum criteria. Methods by which this evidence is gathered overlap with methods used in audits, assessments and external examining. The component methods include self-assessments, document analysis, scrutiny of performance indicators, peer visits, inspections, specially-constituted panels, delegated responsibility

to internal panels often via proxy entrustment to external examiners or advisors; stakeholder surveys, such as student satisfaction surveys, alumni and employer surveys, direct intervention, such as direct observation of classroom teaching or grading of student work.

Accreditation, audit, assessment and external examining

Although accreditation is distinct from audit, assessment and external examining there is a degree of overlap between these different external processes (Harvey, 2002b; Stensaker, 2003).

One big difference, though, is that audit, assessment and external examining operate on the premise that the institution or programme is functioning appropriately and the external process has to demonstrate otherwise (innocent until proved guilty model). For example, audits often involve a methodology designed to test the verisimilitude of institutional or programme claims. Accreditation, though, shifts this round and institutions or programmes have to prove that they are worthy (guilty until proved innocent model).

Nuances

Accreditation thus has three nuances. First, accreditation as a process applied to applicant organisations. Second, accreditation is the label that institutions or programmes may acquire as a result of the accreditation procedures. Third, underpinning the first two, accreditation is an 'abstract notion of a formal authorising power' (Haakstad, 2001, p. 77), enacted via official decisions about recognition (the accreditation process). It is this underpinning abstraction that gives accreditation its legitimacy. Ironically, this abstraction, frequently taken-for-granted, is not a traditionally intrinsic aspect of accreditation. As Jones (2002, p.1) has pointed out, 'The original audience for accreditation was the academy itself. The process did not arise in response to concerns about quality expressed by external audiences…'

This third nuance chimes with the issue, alluded to throughout the forgoing, of the underpinning

ideology and politics of accreditation. It leads to an investigation of the power relationships embodied in the accreditation process. An examination of the perceptions of those who have engaged with accreditation of various types reveals surface views about the benefits and draw-backs. A second-order examination of the comments will, though, also uncover the political and ideological dimensions.

Professional and regulatory bodies (PRBs) play three roles (Harvey & Mason, 1995). First, they are set up to safeguard the public interest. This is what gives them their legitimacy. However, professional bodies also represent the interest of the professional practitioners and here they act as a professional association or trade union (including legitimating restrictive practices), or as a learned society contributing to continuous professional development.

Third, the professional or regulatory body represents its own self-interest: the organisations act to maintain their own privileged and powerful position as a controlling body. This is where control, legitimated by public interest becomes confounded by control based on self-interest.

Views of participants

The following views are derived from what little literature there is on participants' views of accreditation and the responses of 53 academics and administrators who have been involved in accreditation processes. This group, are mainly from the UK with some US, Canadian and Australian input. The qualitative perceptions were gathered on-line via e-mail correspondence (including follow-up discussions to clarify specific areas). The majority of respondents comment on subject accreditation rather than institutional processes and their comments relate to 24 different discipline areas, as well as accreditation of learning and teaching practices *per se*. Quotes are included but for reasons of confidentiality the source is assigned a number, and the remainder of the reference relates to country and the subject area the respondent is talking about. As far as possible, the quote is contextualised without making it too long and AT TIMES

ostensibly deconstructed, using Barthesian [1] semiological notions of denotation, connotation and 'myth', the latter informed by prevailing ideology.

Institutional accreditation is more of an issue in the US than the UK. Programme accreditation in the UK is enormously varied and about 100 regulatory and professional bodies are involved in some form of accreditation of higher education programmes in British higher education institutions (Harvey & Mason, 1995).

Necessity: employment and marketing

Many respondents were of the view that professional accreditation was either necessary for professional employment, or enhanced the job prospects of, their graduates.

However, for most respondents this necessity was closely linked to a concern that the marketability of programmes in some areas is closely tied to accredited status and that failure to achieve accreditation would be problematic:

For some respondents, accreditation was not just necessary or a marketing device to get more students but something that attracted better students. The allusion to real-world relevance is also recognised.

However, comments about real-world relevance, suggests that the accreditors are in tune with the real world, which, as will be discussed below, is a moot point. One US respondent, though asked, 'were accreditation not tied to federal funding or professional licensure, would your institution or program seek it anyway?' (R33, US, general)

Another US respondent seems to suggest that perhaps they would:

I think the self-study provides an opportunity for the institution to conduct a formative evaluation

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1. Roland Barthes (1957), and subsequently other commentators such as Stuart Hall (1973) have argued that symbols (signs, words through to gesture and fashion) have a surface, first-order, denotation. Rose is a word denoting a kind of flower. But also symbols connote something else (a rose may connote passion). The second-order, connotation is contextual, sometimes a rose might connote the British Labour Party. But underlying each connotation is a third-order myth. A rose connoting the British Labour party represents the myth of benign nationalism. Others have taken Barthes further and more pointedly linked the 'myth' to prevailing ideological frameworks.

and identify both strengths and areas for improvement. The accrediting team can offer a more summative evaluation and an objective external perspective that can potentially strengthen the institution. (R36, US, general)

The assumption, here is that there is an objective external view that is the province of the external accrediting body. The 'objectivity', though, may be tempered by the controlling function of the organisation, itself possibly a function of its own self-interest, as noted above.

Uniformity

A significant and often repeated rationale for accreditation in some areas is uniformity across the sector. The presumption is that uniformity is important and desirable and thus that all courses should 'cover' the same content. This assumes that covering the same course content equates with uniformity of learning and understanding of the subject area. The question remains, though whether the demand for uniformity is the professional body safeguarding the public, representing its members' interests or reinforcing its own status?

The assumption is that there is an external guiding hand that knows what's best and that academia has to conform to it. This 'measuring up' is not viewed negatively in this case, indeed it is seen as an opportunity for reflection.

An alternative view is less benign.

Sometimes it seems to be about how powerful the agencies are – the professional body or the institution and I've had experience of it going both ways…. In relation to psychology, it initially resulted in inflexibility in relation to residential schools – mandatory to get a named degree and this disadvantaged women with childcare needs. We then renegotiated after much feedback and because student voted with their feet (didn't sign up) and we then found money to provide an alternative, and an on-line experience was developed. (R8, UK, psychology)

Do we read this as safeguarding of the public or is this inflexibility born of the society invoking its

public security mission to reinforce its political power and omniscience?

What would it matter if undergraduate psychology students on different degree courses took different syllabuses taught in different ways? Tony Gale (2002), ex- Honorary General Secretary of the British Psychology Society (BPS), argues that, given a first degree in psychology does not give you a licence to practice, the society accredits undergraduate courses for political reasons, which have little to do with public security or pedagogy.

Academic or practitioner

This leads to the relative influence of academics and practitioners in each other's realms. 'There is often a clear tension between academic priorities and professional ones in say engineering or social work' (R30, general, UK). I think they [accreditation processes] are valuable when:

- they focus on the professional rather than the academic side of the programme (though it has to be acknowledged that the boundary is usually fuzzy);
- they explicitly acknowledge that the students are being educated and not just trained for a profession;
- they are conducted by peers (i.e. have at least one academic on the panel alongside the practitioners);
- they ask to see only strictly essential documentation;
- they are willing to respect and take on trust the expertise and judgements of, for example, external examiners.

They can be harmful and irritating, though, when the opposite of any of the above happens. I think it is a matter of particular concern when professional bodies try to overrule academic judgements on academic matters, for example, curriculum design and content and assessment of academic aspects of the course. (R35, UK, speech and language pathology, pharmacy, engineering)

The principle concern here seems to be the perceived infringement of practitioners into the academic realm, notably requiring specific course content, making demands about teaching and learning approaches, as was noted with psychology, and even questioning assessment judgments.

The tail wagging dog analogy, used by Gale (2002) above, recurs in comments of respondents:

We have found the RICS accreditation an ongoing problematic saga with [problems] because of allegedly inadequate A-level points at entry. We have a large number of mature students for whom this is irrelevant and besides pride ourselves in how far we raise our students' capacity during the degree not how well qualified they are before they come here. RICS, like so many other institutions, seem to be allowing the bureaucratic tail to way the dog. The actual membership (dealers and auctioneers) claim to be horrified at the bureaucratic requirements but seem powerless to [control] their educational department. (R27, UK, fine arts valuation)

We had a particular problem with one Engineering institution over regulations that allow Honours degrees to be awarded to students who have been reassessed. I think we got into a tail wagging dog situation and included a 'notwithstanding' clause in the regulations to appease the accrediting body. (R16, UK engineering)

I am also aware, from my old NVQ days of training and development, that meeting awarding body requirements can galvanise centres into improving numerous aspects of their programmes, but can also end up with the tail wagging the dog. (R3, UK, general)

It is curious that these respondents should all use exactly the same phrase about accreditation implying a clear perception in the sector about confusion of the locus of decision making. It is also interesting that the analogy is used rather than any direct statement made about where the power should lie. Indeed, only one respondent, an administrator, actually directly talked about accrediting bodies and academics struggling for power. It is almost as though it is a taboo subject. Even the different political agendas embedded in the accreditation

process rarely seem to get publicly aired. The following is unusual in being blunt about the politics:

I have been involved in visiting boards myself on behalf of the RIBA and Architects Registration Board and actually chaired one to [another university]. When I was chairman I suddenly became aware of how many hidden agendas were in existence and as we rejected the views of both the RIBA Education chairman and their full-time officer as to what we should say about the school (before the visit took place), I was not asked to chair a visit again. (R9, UK, architecture)

The tension occurs mainly in three areas; programme content, programme delivery and bureaucratic requirements. The issues around delivery are particularly about contested control and consequent inhibition of innovation. Bureaucracy is as much about synchronicity of processes as it is burdensome workloads and unnecessary requirements.

Content

The issue over programme content is not so much the specification of what subjects should be taught but how restrictive that specification is perceived. Academics tend to think that externals/practitioners only need specify what is an essential core that would enable a student to become a practitioner and then leave it to the academy to develop a coherent educational programme delivered in a manner that they consider is pedagogically sound.

Delivery and innovation

Some respondents thought there was potential in accreditation to rethink and develop innovative ideas. However, despite the potential there was no guarantee, for various reasons, that this would happen. The structural constraints and the membership of visiting panels impacted on innovation.

Overall it really depends on the accreditation body and level of the subject area. I found from my experience that it was restrictive in some ways but there were also opportunities to be innovative and cover the same areas in a different way. (R4 UK accounting)

Professional body accreditation does stimulate programme teams to rethink what they are doing and encourage innovation but often within a pre-defined area. For example, CIPD requirements have stimulated higher education providers to build in competence outcomes to programmes which might otherwise be purely academic. (R1, UK, personnel and staff development)

Depends entirely on the organisation and indeed the panel who visits. My experience has been RIBA [Royal Institute of British Architects] good and developmental, as are RTPI [Royal Town Planning Institute]. The Institute of Environmental Health – a real pain – they are policing things not developing. The opportunity [to rethink programmes] again depends – especially on the nature of the guidelines and degrees of discretion. Environmental Health is compliance; the others much more developmental (R7, UK, architecture and environmental health)

How valuable it is must surely depend on how it is handled, but my fear is that it can deteriorate to ticking boxes and compliance. A notable exception is the accreditation of academics by ILTHE, which is based on the SEDA scheme. This is wholly qualitative. Hence it most emphatically can and does lead to rethinking….The SEDA scheme has led to a substantial amount of innovation. (R39, UK, education)

This perception of the positive, innovatory effects of the ILTHE process resonates with earlier views and is further endorsed by another respondent:

All the team thought that the discussions were really useful and productive, and that the ILTHE [accreditation] processes were very worthwhile. I also think that the processes actually encourage innovation, while at the same time helping innovators to think hard enough about how their ideas are actually going to work in practice. (R15, UK, education)

The key to the satisfaction with this process might be that it encourages self-reflection and drives innovative thinking, requiring academic legitimation rather than compliance. The control element,

in effect, is minimised and the trust, innovative and reflective element is maximised.

One respondent, referring to engineering, noted:

Constraints of accreditation seem to be on content rather than style of delivery, so doesn't necessarily restrict innovation in learning and teaching methods. (R16, UK, engineering)

However, not all those involved with engineering accreditation agreed:

Let me be frank. I believe accreditation to be a dead hand discouraging innovation and restricting students in what they do. I would far prefer to work in the non-accredited courses (BSc or whatever) then in the accredited ones (BEng or whatever) because they can be so much more exciting. Sorry, but that is my considered opinion after 13 years as a professor of engineering in the 'former poly' sector. (R19, UK, engineering)

I have found that the alleged demands of regulatory/professional bodies does restrict the options for the curriculum – for example, in Engineering, the B.Eng has restricted the University's policy on free choice modules (such as languages) as demanding core modules for all modules as that is the requirement of the professional body. This is a debatable point of course – it depends on what was said to the professional body by the engineering staff and as some of them are on the professional body anyway..... (R40, UK, engineering)

This sceptical response is consistent with a discussion below about the alliance some academics make with the professional bodies against their institutions.

It was not just in engineering that respondents thought accreditation stifled innovation. Respondents were particularly concerned about situations where accreditors went beyond content and made requirements about delivery:

The Geological Society had just taken upon itself a new role as watchdog over professional qualifications for geologists, and [my university] was in the vanguard, applying for accreditation of its courses. Not all of the courses could actually be accredited because the Geological Society put some very stringent requirements on the fieldwork component of an accreditable course…. My perception is that we believed that we had to do it to retain credibility and that it was indeed just a hoop to jump through. We even see accreditation as a force for stasis, because it prevents us from accrediting innovative new courses that we might want to run (problems with rigid fieldwork requirements, etc.). (R43, UK, geology)

The terminology here is instructive: 'watchdog' and 'hoop to jump through' imply not only the compliance requirement of the latter but also that the organisation set itself up as a controller of the discipline, although no evident public interest is served by the requirements.

Other respondents also implied that the control function inhibits innovation:

All your questions triggered immediate recognition. Particularly the danger of constraining new developments and fixing a national curriculum in concrete. (R18, UK, psychology)

At present any innovations I make, which I see as positive, I must always share but not in a constructive manner...more in an 'asking permission' type situation. I can see that this might restrict others who may see that they must continue to comply in a middle-of-the-road fashion. (R37, UK, education)

In seeking permission the last respondent denotes a process of supplication. However, the second-order connotation is a lack of trust of the academic and the underlying Barthesian, third order, 'myth' is that there is a body that indeed has the knowledge and wisdom to grant permission. An alternative take is to see professional bodies as disengaged from the reality of the higher education setting.

Some respondents cited the variability of the visiting panel as a reason for inconsistency in effecting innovatory change:

In answer to your question re innovation I think the extra burden of yet more self-justifying representatives on validation panels does nothing to encourage improvements in teaching and/or learning. (R27, UK, fine arts valuation)

The RIBA visit was always a clubby sort of thing and you were either in or out of the club. The panel coming to visit us next week is almost entirely made up of thrusting young professional climbers from the south east of England, who have the time to be on endless RIBA committees. They will have little idea of how we are working in the hothouse of education today and almost certainly will never have heard of the RAE! They will concentrate almost exclusively on 'Design' and ignore the rest of the course. (R9, UK, architecture)

A holistic view was provided by a respondent who argued that the accreditation process was cyclical and this impacted on the innovative potential of accreditation.

The bottom line is that there seems to be a cycle – first the educational process gets behind 'real life', if the Body is on the ball it writes a report, generates a new specification, etc. The profession's education process catches up, the Body can then stagnate for a bit, and so on. [Innovation] depends on the Body and which bit of the cycle you are in. Until 1993, nothing much had changed in medical education for 100 years. A relatively radical document changed all that. Problem-based learning is alive and well and so are graduate entry courses. But much of that comes from government imperatives – new medical schools, workforce issues, etc. (R5, UK/Australia, medicine)

Here, the external body is reduced to anything but knowledgeable and wise. Indeed it is seen as essentially pragmatic and propelled into action by historical necessity.

In the US, it seems that the real motive force for innovative change in learning and teaching is not the accreditation process *per se* but the potential of the consequent assessment of student learning outcomes, which research provides a basis for engaging with innovative pedagogy.

Bureaucracy and burden

A recurrent theme was the amount of work involved in accreditation. A problem accentuated by rigidity of requirements, perceived at best as heavy-handed bureaucracy and at worst as an unnecessary degree of control.

One respondent spelled out the problems in detail:

I was in charge of a group of people (we called it an Accreditation Committee) – which included all course leaders, admissions tutors, etc, over 20 people altogether – who prepared documentation and saw through the IEE Accreditation Panel visit last May for the whole of the School. We got full accreditation of all 28 degrees we offer… This exercise cost me personally seven months of hard work (about 50% of my time) and hundreds of hours of work of my colleagues. … The process is too bureaucratic and requires too much documentation (although we were able to convince the IEE to accept some information in electronic form only). It takes too much of the valuable time of the academics and takes them away from research and teaching…. You might be interested to learn for example that to get 24/24 in QAA we invested 3 man-years of work! The IEE accreditation took about 1 man-year, RAE (where we got 5* in both 1996 and 2001) similar. (R2, UK, engineering)

When asked how might the bureaucracy be reduced, the respondent answered:

In many ways. For example:

- *by accepting information already existing in the department/school in the form already available. We spent days transferring information and recasting it in the format required, different from ours.*

- *by not insisting on producing the 'progression of students through the programme' charts – unless the universities have appropriate software to do it automatically (it took us a month of hard work to complete these charts and I doubt if anyone really looked at them!).*

- *by accepting information in electronic format. For example our entire operation of the School is on intranet and everything the IEE wanted was there – but admittedly not in the format the IEE forms expected it, hence a lot of our time*

was spent on pulling the bits of info out and plugging them into appropriate tables or boxes.

I would go even further by suggesting that accreditation institutions should NOT insist on any particular format in which the information is submitted, but they of course should expect that information does exist and they should indeed be making judgements and assessments whether the way in which information is kept is appropriate or not. We feel, for example, that our way is better than what IEE wanted from us, so in that sense we were wasting time by reformatting the content. Currently there is far too much duplication of presentation of the same information in many different formats.

Others, noting the amount of work required, were less negative in the connotations of their remarks:

Yes valuable – although one has to put up with the inevitable requirements for oodles of paperwork (since we had lots of that, it was not problematic!) (R32, UK, education)

The connotation of 'oodles' is benign; someone who has oodles of food has a joyous surfeit and this is re-presented in the parenthetical comment. The implication being that, if the process is worthwhile, the paperwork requirement is an appropriate price to pay.

Going further, one respondent talking of the process in biomedical sciences noted:

I cannot think of any alternative procedure that could ever be as effective as a one-day intensive look at the syllabus, facilities (laboratories, library, etc.) and staffing. This is streamlined, mutually beneficial to all concerned, encourages innovation, and yet is acceptable to the IBMS and the Health Professions Council. (R21, UK, Biomedical Sciences)

Despite the apparent compatibility in the biomedical sciences setting, an issue that annoyed many respondents was that of synchronisation between external agencies:

My difficulties with the current system are the huge amount of paperwork which is spilling out and the

lack of cohesion regarding validation-type visits. I often find the QAA, the NMC [Nursing and Midwifery Council] and NAO [National Audit Office] are visiting an institution at the same time but rarely share the same documents! (R47, UK, nursing)

Here I do have strong views. I think the accreditations institutions, RAE, QAA, and anyone else subjecting the universities to continuous assessment processes should agree once and for all – in consultation with universities – the format in which information should be kept and presented for all purposes. Then it is just the question of pressing appropriate button (literally on the screen) to retrieve information for a particular exercise. We do have all necessary information all the time and yet every time an assessment takes place we spend weeks or months preparing the documentation. (R2, UK, engineering)

The lack of synchronisation and incompatible documentation is indicative of the desire for different agencies to control their corner of the quality and standards monitoring process and, again, one might ask whether this is in the public interest or the monitoring organisations' self-interest?

However, not all the extra burden was externally imposed. Sometimes the burden is increased by the quality control processes within institutions. The argument might be that this is the inevitable self-preservation response of institutions subject to increasing accreditation demands. Certainly, the proposed new accreditation processes in some Western European countries are ludicrously bureaucratic and evidence of a lack of trust in academia.

Alliance

Curiously, at first sight, given the tensions explored above, academics sometimes make use of the professional or regulatory body to support their own ends. Knowing the power of accreditation in the marketplace, they ally themselves with the professional body. Sometimes this alliance is used to conserve existing practices and sometimes to make demands on institutional resources. Gale (2002) noted that:

as the teaching of psychology spread from a handful of old universities to the whole higher education system, heads have found Society accreditation a useful political tool. They have used the threat of withdrawal of accreditation by the Society as a means of securing enhanced facilities for their undergraduate programmes.

Respondents on both sides of the Atlantic remarked on this:

There are some disadvantages to accreditation. It is expensive and sometimes accrediting teams will make recommendations that cause money to be shifted from unaccredited programs to accredited ones so that the accredited ones can retain their accreditation. This is an unfortunate consequence. (R34, US, general)

[Programme teams] find professional body accreditation provides a 'bulwark' against senior management initiatives to reduce resources (R1, UK, personnel and staff development)

Accreditation is most valued by those who are closest to not having it (the marginal) and by those who know how to use it creatively to conduct innovative self-evaluations or to strong-arm funders with "what the accreditors say we absolutely need to retain accreditation" (R33, US, general)

The apparent curious alliance is resolved relatively easily. Not only is this a manipulative ploy based on academic self-interest, using whatever support comes to hand, especially in resource-straightened times, but professional bodies are not mutually exclusive of academics. Indeed, sometimes seem to be controlled by them:

Some employers seemed to be critical of the actions of the Engineering professional bodies in raising the academic requirements for full chartered status, partly to enhance the status of their profession (in relation to other professions).… For some employers, the fact that the engineering institutions (i.e. the professional bodies) are dominated by academics reinforces this emphasis on educational needs rather than the needs of the industry. (Little et al. 2003)

Specialist activity

What emerges from all the responses is that accreditation is a game for specialists; it is not something that engages the majority of staff nor, to any significant extent, exercises the students. For the latter, accreditation means the kitemark rather than the process. It is about uniformity of curricula, as one medical student noted, 'we all need to be doing the same syllabus'. Part of the controlling element of accreditation is that it does not engage everyone and retains an element of mystification.

Power

Accreditation is a struggle for power and it is not a benign process. Nor does it engage all those involved. It is also not a pure process of identifying those who have met (and continue to meet) minimum criteria to join the club. The evidence from the UK and North America shows clearly that accreditation is just one of a raft of ongoing processes that demand accountability and compliance as managerialism continues to bite into academic autonomy and undermine the skills and experience of educators. Accreditation is yet another layer alongside assessment, audit and other forms of standards and output monitoring.

The accreditation-improvement paradox

The quality debate in higher education has, for a decade, attempted to engage with the apparent incompatibility, in practice, of accountability function of external quality monitoring and the hoped-for improvement function (Vroeijenstijn, 1995; Middlehurst & Woodhouse, 1995). This is mirrored in the analyses of voluntary accreditation in the United States. Graham, Trow, & Lyman (1995) argued that the accreditation process is fundamentally flawed because the process of certification and assurance to the public of the soundness of the institution's practices is incompatible with the improvement of an institution's performance based on its continual assessment and evaluation of its strengths and weaknesses. The certification function invariably overwhelms improvement because the process leads to the production of a public relations document that overstates the insti-

tution's strengths and conceals its weaknesses. This is precisely the opposite of what is needed if the improvement function is to be served by accreditation. More to the point, as Murray (2002) notes, accreditation in the United States has not satisfactorily persuaded the public that the quality of the professions is safeguarded.

We should also expect to find that the assurance of quality in the other learned professions is, like teaching, beyond the capacity of accreditation itself and that it inevitably entails the mechanisms of licensure, certification, peer review, employment, and so forth. The decisions made about the granting of employment, the professional license, certificate, merit award and honors, should be based more on solid evidence of accomplishment than on conformity to standards, largely unvalidated, and established by mere consensus of the members of the profession.

Although the surge towards accreditation in many parts of Europe is not being delegated to self-interest membership bodies in the main, there remain issues of bureaucratic self-interest. Self-perpetuation and a growing desire to control are characteristic of all types of quality monitoring agencies, especially those with control remits. Furthermore, as the American experience shows, accreditation is not distinct from quality issues and there is nothing to suggest that accreditation will not be wrapped round with audit, assessment and other forms of quality evaluation. As the edifice grows and becomes more specific and directive, so academic alienation increases, staff perceives a lack of trust and their own academic judgement being undermined. The resultant perception of deskilling and diminution of autonomy and freedom to make pedagogic decisions creates a context of compliance and, ultimately, as has been seen in other areas of quality control, game playing, manipulation and subversion of the process (Barrow, 1999). Improvement is a long way down the agenda, if it is really on it at all.

Most frustration is expressed at the loss of control of the pedagogic situation and the potential for improvement. The positive view of the ILTHE process (discussed above) is precisely because it

encourages innovation and reflection and delegates control to the academic. Although educators may not be aware of the specific concerns of a professional practice workplace, practitioners are equally unaware of the learning process. Teachers, if not 'up-to-date' understand the principles of the professional realm they teach about: it is far from evident that professionals representing accrediting agencies are so well versed in the principles of pedagogy.

Conclusion

However, the concern is not so much whether accreditation is a benign protector of the public interest or a process to sustain the self-interest of the accrediting agency. Nor, indeed, whether processes are bureaucratic or restrictive and inhibit innovation. Important as these are, they are indicative of a more deep-seated ideological presumption summed up in Jon Haakstad's (2001) third nuance of an 'abstract notion of a formal authorising power'. Repeatedly we saw references to jumping through hoops, tail wagging dogs, asking permission and the like. Even one of the strongest supporters of accreditation, who noted that 'a one-day intensive look at the syllabus, facilities and staffing… is streamlined, mutually beneficial to all concerned and encourages innovation', made it clear that the process needed to be 'acceptable' to the professional and regulatory bodies.

The underlying, third-level, 'myth' is that of the abstract authorising power, which legitimates the accreditation activity. Yet, although taken for granted, this 'myth' of benign guidance is perpetuated by the powerful as a control on those who provide the education. Accreditation is fundamentally about a shift of power from educators to managers and bureaucrats. It accentuates the trends already evident in the UK towards 'delegated accountability' (Harvey & Knight, 1996) but reverses the delegation trend in most of the rest of the Europe. To understand staff perceptions of accreditation, the starting point of this paper, requires a holistic view that sets the control function of accreditation within the wider context of higher education as a public good. It is necessary to dig beyond

the surface legitimations of European unity and consumerist rhetoric to reveal the power processes and the ideology that legitimates the control function of accreditation. Only then can we approach accreditation openly and critically.

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1.2 Licence to Kill: About Accreditation Issues and James Bond

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Accreditation has become something of a hot topic in higher education in Europe. My former Senior Inspector, Frans Leeuw, once called accreditation a "Licence to Kill". The James Bond metaphor is particularly illustrative when reflecting on quality assurance challenges in higher education. If you look at publications on this subject in recent years, many issues associated with accreditation are explainable using titles of Bond films.

From Russia with Love:
the origin of European accreditation

The Bologna Declaration was signed in 1999 by 29 European ministers of education. They declared their support for creating a European Higher Education Area by introducing a higher education model consisting of two cycles (Bachelor/Master structure) and by strengthening quality assurance in higher education. They expressed the firm wish to expand co-operation in the quality assurance field by such means as the European Network for Quality Assurance in Higher Education (ENQA) and the European University Association (EUA) and by framing new legislation.

Given the European desire for co-operation, it may seem logical to introduce a single quality assurance system, i.e. accreditation, yet it is not an obvious course of action. The Bologna Declaration purposely avoided using the word accreditation. The European ministers did not want to pin themselves down to a single system, and definitely not to one uniform quality system. They chose to stick firmly to the national competence for education policy and quality assurance. Nevertheless, some European countries are now in the process of introducing or preparing accreditation. They include Germany, Ireland, Italy, the Netherlands, Norway, Austria, Spain and Belgium (Flanders).

When referring to other accreditation systems, Ministers tend to refer to the United States, as the system there has existed for several decades. Interestingly they do not refer to existing accreditation systems in Eastern Europe. Forms of accreditation have existed for many years in Russia, Hungary, Poland and other countries. The reason was the explosive growth of commercial institutions of higher education. These are not voluntary quality assurance systems set up by educational institutions, but the system laid down by the government with the aim of guaranteeing quality in higher education. Pivotal to the Eastern European approach is the achievement of the minimum quality standard.

As a result of the Bologna Declaration, a working group, headed by the CRE (now EUA) prepared a report on accreditation. The CRE group involved in the project started out with the following working definition: *"Accreditation is a formal, published statement regarding the quality of an institution or a programme, following a cyclical evaluation based on agreed standards".*

Having a closer look to the CRE-definition and a couple of new accreditation systems in Europe it seems that they opted for a statutory system with a public quality mark that shows that education satisfies the criteria of basic quality. Viewed in this light, these accreditation systems appear to be rooted more in the East than in the West. But just as in "From Russia with Love", things are not exactly as they seem. In the Eastern European system, the focus is so much on meeting the basic quality standards that improvements beyond this level receive less attention. It is therefore no coin-

cidence that international experts recommend giving more attention to this matter.

The World is Not Enough: uniformity at INQAAHE and ENQA

The remarkable thing in Europe is that despite the reason given (in the Bologna Declaration) for greater harmonisation and synergy, we see countless national initiatives in which accreditation:

- is defined and perceived differently;
- is sometimes a complete system, and sometimes an addition to an existing evaluation system;
- embraces the entire higher education system in some cases, and in others only new courses;
- is sometimes built around the institution, and sometimes around the programme.

Establishing national systems of accreditation therefore soon tend to produce divergence, in conflict with the Bologna Declaration.

Yet despite the great differences in the structuring of quality assurance systems, there is nevertheless substantial convergence. Harvey has shown that, regardless of whether it concerns an institution or programme evaluation, assessment, audit or accreditation, there is always the same kind of approach. External evaluation always begins with self-evaluation, peer evaluation (evaluation by impartial experts, usually from the field of study concerned), use of standards, performance indicators and public reports. Despite the different national initiatives, there are certainly opportunities for the Higher Education Area envisaged in the Bologna Declaration.

Comparability of systems is a good measure of trust, the ideal basis for international mobility, and that is the priority of the European ministers. But there are also some potential disadvantages to this approach. Harvey mentions "dramaturgical compliance": quality assurance will become a fixed ritual, according to fixed procedures, with quality assurance appearing to become an end rather than a means. To ensure that sufficient mutual trust exists, initiatives have been launched for a World Quality Register. Leeuw rightly mentions that this leaves the established ritual intact: this world standard is not enough.

The Man with the Golden Gun: bespoke or "one size fits all"?

"One size fits all" sums up the existing quality system in Europe. Comparability is the prime consideration, with the aim of assessing similar courses or institutions in a single procedure using the same assessment framework. This same principle applies in the European accreditation system.

The question is whether this development in quality assurance is in line with developments in education. According to Leeuw, we see variety in numerous forms in higher education:

- types of education;
- administrative relationships between institutions of higher education and universities;
- size of institutions of higher education;
- the way education is being modernised, based on the Bachelor/Master structure;
- method of selection, such as the introduction of a binding study recommendation;
- dual programmes or other programmes;
- extensive or intensive education;
- electronic learning environments.

A conceivable scenario for higher education is atomisation and shopping, which will result in individualisation of learning processes and learning styles. In this scenario, the student's personalised demand for education is becoming increasingly important. Quality assurance is geared to the substance of learning, to the offerings available, and accreditation could upset the proper harmonisation of supply and demand.

The Higher Education and Training Awards Council (HETAC) in Ireland has opted for promoting variety, also among non-university education providers. A robust attempt has been made to sustain and improve the vocational degree programme in analogy with the United Kingdom and Australia. With quality assurance as one of the key factors. The number one consideration is to assure quality in each discipline. This starts by ensuring variation of quality assurance in each discipline.

The proposed approach starts with graduation courses and continues to the Masters. This prompts the question of whether the Bachelors should move in the same direction in due course. In the proposed evaluation, the role of information is decisive. As mentioned earlier, the submitted and validated information must meet stringent requirements. The institutions in Ireland do not seem to have much difficulty in this respect, because internal quality assurance automatically generates this kind of information. Are these the first signs of a trend towards breaking away from "one size fits all"? Will off-the-peg quality assurance (Walther PPK) disappear to make way for the Golden Gun of the tailor-made alternative?

Dr No: peers or more

The prevailing quality assurance model includes a large role to the impartial experts, or peers. The model actually encounters very little resistance. Van Berkel, for example, is highly critical of the system of peer assessment, but not of the experts themselves: "*As long as the courses come through the peer assessments, they take the view that they are working in the right way. Courses are satisfied if they pass the peer assessments. They receive the quality mark from external experts (...) Panel evaluation relies heavily on the expertise of the members of the visiting committee (...). Just as now, the committees should consist of experts with broadly-based skills in the subject matter of the course and with educational competencies.*" This is a surprising finding, given that he also states that the assessment system does not touch on the essence of education. Apparently, it is not due to Dr No – who is, after all, smart enough to deliver the quality required – but rather because of the working method.

Golden Eye:
the carpenter's eye and other pointers
for the working method

Van Berkel asserts that the peer assessment process is increasingly being orchestrated by both the courses and the external organising authorities. Checklists are a popular means to this end. But he

observes that fundamental relationships between the elements within education are not being examined: "*Education is more than the sum of all kinds of quality aspects.*" Van Berkel advocates a more holistic approach, with the expert occupying a more central position. And he is not alone in putting the application of established standards into perspective.

Lee Harvey makes mention of an orchestrated game: "*Typically, auditors 'hold court' in the University Senate Room and see a stream of visitors, usually in small groups. These groups are summoned early by the university senior managers, briefed before they go in to see the auditors and de-briefed when they come out. The auditors hear a story that reflects the formal organisational process. Formal structures, though, are significantly removed from the reality of the living and dynamic organisation that is the university*".

Leeuw follows Harvey in stating that the fixed, established standards and methods allow perversion in the quality assurance system: "*Evaluation performance can inhibit innovation and lead to tunnel vision and ossification: organisational paralysis brought about by the system of performance measurement (….). It is reasonable to assume that no matter how well-intended evaluation activities may be, they can and probably will have unintended and undesired side effects that jeopardise performance and /or quality improvement within the evaluated or audited bodies*".

Leeuw offers the following solution: "*Experimental or quasi-experimental designs for evaluation are preferred over other designs, triangulated data are preferred over single method approaches and longitudinal studies are preferred over single shot studies. Triangulation includes the use of mystery guests and unobtrusive measures*". In other words: variation and surprise.

A View to a Kill:
the example of the trial accreditation

Even before the Minister published his "Mark of Quality" policy document suggesting proposed accreditation in the Netherlands, the idea was already under experimentation in higher education.

In 2000, a trial with accreditation was carried out in courses for social work and services as well as business economics (the so-called 'trial accreditation'). The protocol stated that the most important difference compared with the prevailing system of peer assessment was the greater emphasis on the objectivity of quality checks and determination of the degree to which the quality of education satisfies the defined quality requirements. With this in mind, the protocol put forward standards that have been elaborated into 80 verification items. Guidelines were also laid down for the working method (self-evaluation reports, panels and reports).

CHEPS, which evaluated the trial, expressed criticism on this point in its evaluation report. The guidelines and standards led to a cumbersome process: the guidelines were far too much of a good thing; the costs outweighed the benefits. Viewed in this light, the CHEPS evaluation seems to be a "view to an overkill". But the evaluation is not entirely negative; there are certainly learning benefits, among other things because of objectivity. The decisions, for example, were thoroughly motivated.

Similarly, the Inspectorate of Education in the Netherlands carefully worded its opinion in its meta evaluation of the trial accreditation. Among other things, it expressed appreciation for the vast majority of the performed analyses and clearly worded opinions. But the Inspectorate also observed that the protocol of the trial accreditation for higher vocational education did not prescribe a number of matters and that they were consequently missing from the reports. An example is the absence of the requirement that the assessment should take previous evaluations into account. As regards the set of tools used, the Inspectorate said: "*The Inspectorate does consider expansion of the set of tools to be necessary. Where a regulation is not possible or desirable, the Inspectorate recommends using the instrument of triangulation: expansion of the external material with a view to internal, inter-subjective weightings*". One conclusion in any event seems inescapable: the quest for the Holy Grail of optimum quality assurance is more about smart systems than about large ones.

Live and Let Die: the report

The proof of the pudding is in the eating. Even with a very high quality panel and a perfect working method, the entire exercise will be a failure if the evaluation is not reported properly. That is why in its meta evaluation the Inspectorate laid down stringent requirements for reporting. Not only must all quality aspects be covered, but the report must also be a complete array of information, analysis and judgement. We know from experience that information and judgement are usually set down properly. The analysis is the critical point.

The West-European accreditation laws appear to assume that accreditation can be introduced "on top of" peer assessment without this generating any side-effects. This creates limitations that can be all the more penetrating as far as accreditation is concerned because there is no improvement process (in terms of possibly remedying shortcomings) but merely a *yes/no* decision. There are two possible consequences of this situation: the legitimacy of the accreditation could be undermined, particularly if the accreditation agency confines itself purely to validation of the reports. The second potential effect is that peer assessment will be jeopardised, or its nature will change. Institutions co-operate substantially in peer assessment at the present time, among other things or perhaps primarily because of the existence of an obvious improvement mechanism. In the case of direct yes/no decisions, there will be mounting pressure on institutions to adopt a strategic stance. This will increase the risk of reports of declining quality. It goes without saying that institutions and possibly also the visiting committees will be tempted not to disclose information, especially certain parts of the analysis.

For Your Eyes Only: disclosure?

One of the trickiest dilemmas of higher education systems is the degree of openness and disclosure. Despite all beautifully worded pronouncements like the Bologna Declaration, the European higher

education market is still far from transparent. The European Higher Education Area is central to the Bologna Declaration and requires facilitation of student mobility. Minister Hermans recognised this by deciding resolutely that the accreditation system had to yield information above basic quality level.

One of the objections of institutions to public reporting is its misuse for "ranking". It is an understandable objection. The quality of higher education consists of numerous aspects that cannot be covered in a template or routine classification. However, rankings will ultimately be made anyway, on account of the transparency and disclosure of all information. Rankings already take place. They are made by private publishers, not only in the United States but also in Europe. But the manner in which the analyses are edited means that they are not always consistent and that the rankings are in some cases even misleading.

The methodological problems have not led to the publications becoming unpopular, however, and the opposite is actually the case. Even more surprising is that the national agencies have not considered it necessary to issue their own accurate public information. Why is this? For whose eyes are they afraid?

Tomorrow Never Dies:
about infinite improvement

Public reporting is one thing, but action in response to it is something completely different. The follow-up in higher education quality assurance occurs in several forms: evaluation of the process, monitoring of improvement plans, monitoring of improvement activities and, last but not least, monitoring of the effects of the improvement. So are sanctions taken?

The forms of follow-up action in Europe are scarce. That applies very notably to the imposition of sanctions. Quality assurance in Europe is apparently set in the framework of the possibility of improvement and further improvement. What about the Netherlands? Do we show the players a yellow or perhaps even a red card?

The Living Daylights
or **Die Another Day?**

A warning is in the air! Until 2003 proceedings exist to give study programmes an official warning in the Netherlands. If the given conditions are not met in due time, the diploma will then no longer be an official higher education diploma and the course will no longer qualify for funding. Students following the course will no longer be eligible for study grants. This amounts to a severe sanction. The basis for taking such a sanction was a report about an observed lack of quality, submitted by the Inspectorate to the Minister. Conditions for the measure are that the education provided by a course must have been demonstrably ailing over a series of years and that, after hearing the institution and/or course, there is no confidence in the serious shortcomings being rectified or the root cause being eliminated within a reasonable period (one year).

In Bond terms, the Inspectorate report is intended "to scare the living daylights out of her". But does this result in red cards? Despite the embedded picture in the Netherlands and beyond, the final sanction of definitive termination of funding has not yet occurred in the Netherlands, although we have come very close on a few occasions. In a number of cases, the institutions drew their own conclusions and closed down the course; in other cases, they took firm action. This was further stimulated by the "impending warning". Unorthodox agreements are possible in the Netherlands between the Minister and an institution if "a warning is in the air". That will be the case if there is:

- a prolonged serious shortcoming;
- endorsement by the Institution of the Inspectorate's analysis;
- an intention to issue a formal warning (yellow card or worse);
- a substantial and demonstrable improvement by the Institution;
- an agreement that the Inspectorate will re-examine the course in the near future (for example, in six months' time).

Unless the situation improves substantially in the intervening period, the Minister will continue to issue an official warning, followed by the possible withdrawal of accreditation. This amounts to a "Die Another Day" scenario. In three instances it has produced very fast results. The institutions concerned immediately took drastic improvement measures. The result was ultimately positive.

Accreditation as a *yes/no* decision renders scenarios like this impossible. But the pressure on the system to make it possible will increase in my opinion.

The Spy Who Loved Me: stimulatory supervisions

The introduction of accreditation will stimulate the debate: "Who will accredit the accreditors"?

The supervision of accreditation embraces:

- supervision of the accreditation agency itself consists of supervision of such matters as the negligent performance of duties, the holding of outside positions, the overturning of decisions and supervision of the effectiveness of the agency;
- the degree to which accreditation contributes to achievement of the defined goals;
- the degree of effectiveness of the accreditation system.

In the Netherlands, the Inspectorate for Education has this supervisory task. A specific role for the Inspectorate lies in situations where a course is found not to meet the standards at the time of accreditation, but where the Minister decides under special circumstances that it is in the public interest for the course to continue to exist. In that case, supervision of the required improvements and similar matters is necessary.

Less prominent, but no less important, are the following tasks:

- judging the quality of education; this takes place at system level, with the exception of examination of observance of rules prescribed by law;
- promoting the quality of education; this, too, occurs at system level;
- reporting on the development of education.

It remains to be seen whether the picture of the "Spy Who loved Me" is an appropriate parallel. But it does appear that more is being done in the way of stimulatory supervision than used to be the case – through the promotion of quality. It is a challenging prospect for the Inspectorate, because promoting quality of education is the bottom line, what it is all about. Quality of the highest level as an objective: Diamonds are forever?

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1.3 Premises to Accreditation: A Minimum Set of Accreditation Requirements

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Glossary and principles

Evaluation

Evaluation is widely used to express a judgement on the potentials or on the effects of public actions (e.g. political, economic, investments, planning, infrastructure projects).

A more rigorous definition of evaluation is:

- a cognitive activity aimed at providing a judgement on an action

- performed following explicit and clear procedures
- with the intention to produce outside effects.

Formative / summative

Evaluation can be *formative* or *summative.* If an evaluation has a formative function, it is oriented towards the improvement of actions, to better structure and the processes, and to change what is not working. Formative evaluation is essentially based on the qualitative judgement of experts, even if it depends on data or indicators, and it typically concludes with recommendations. The evaluator becomes, in some way, a participant or co-responsible in the management of the action.

If the evaluation has a summative function, it is interested in the accountability, in certification or, in extreme cases, in accreditation. A summative evaluation usually rests heavily on data and indicators, and concludes with affirmations or opinions. The evaluator is neutral, attentive to outcomes.

Essential premises

The evaluation must identify and respect certain essential premises:

1) the mandate of the evaluation
- know who will use the evaluation,
- know what will be the principal use of the evaluation (summative or formative)

2) the primary objectives of who is being evaluated
- know to what degree the evaluation must be oriented towards:
- internal efficacy: comparison of the results obtained from the programme with the initial objectives
- external efficacy: comparison of the results obtained from the programme with the outside requirements (economic and social context).

3) the instruments of observation and judgement
- know the value system of the organisation implementing the action;
- define the indicators that describe the primary objectives coherent with the value system;
- know how to concretely gather the information that will enable us to draw conclusions and ex-

press judgements (formative, summative or mixed) based on facts.

Quality

Quality in University formation concerns, obviously, the calibre of the results of the teaching and learning process.

This definition reveals its difficulties when we try to define the system of values and the relative indicators that "bite" into the problem of quality: the competence of the teachers, the suitability of the facilities, the existence of an organisation able to control and intervene in the formative process, the acquisition of knowledge by the students, their good results in exams, their pass rate etc.

The ISO 9001 definition of Quality: "the totality of features and characteristics of a product or service that bear on its ability to satisfy stated or implied needs" in higher education can be interpreted as (Sparkes 1999)[2]:

"specifying worthwhile learning goals and enabling students to achieve them".

Where:

i) specifying worthwhile goals involves paying attention to academic standards, to the expectations of society, to students' aspirations, to the demands of industry and other employers, to the requirements of professional institutions, to the fundamental principles of the subject, etc.; the "stated or implied needs" of these stakeholders are not all mutually compatible, so there can be many possible and valid interpretations of "worthwhile".

ii) enabling students to achieve these goals involves making use of research into how students learn, adopting good course design procedures and building on successful teaching experience, all of which may require professional development for most lecturers.

The concept of "fitness for purpose" cannot lead to acceptance of any system that operates according to any identified and declared purpose: "fitness for purpose" must be complemented with "fitness of purpose", i.e., the relevance of the purpose must be challenged (Kristoffersen, Sursock, Westerheiden, 1998). Such complement is guaranteed by due consideration of customer needs and requirements.

Accreditation

According to (Hämäläinen et al, 2001)[3], the term accreditation *expresses the abstract notion of a formal authorising power, acting through official decisions on the approval of institutions (or not) or study programmes.*

However, if the provider of the accreditation is a public organisation allotting funds, the meaning becomes quite precise: accreditation is a process aimed at introducing standards of quality, according to objective parameters, for those subjects who implement actions in the formation system in order to realise public policies for the development of human resources.

Accreditation is a binary judgement (pass – not pass) on the award of a status or on an approval.

It is a process, primarily an outcome of the evaluation. It can be considered an extreme case of summative judgement after an evaluation process.

Responsibility

Responsibility for the quality of the formation is to be sought at the level where competences aggregate and are coordinated, that is, at the level of the programme.

The programme has the primary responsibility for establishing:

- the professional figure to be trained (integration between the university system and society or work market),
- the consequent learning objectives (expected level of knowledge and skill that the student

2. Sparkes J.J., 1999, A proposal for a formalised procedure for achieving good quality teaching of engineering in European universities, Position paper on Quality and Quality Assurance, H3E – Higher Engineering Education for Europe, Working Group n.2 "Quality and Recognition in Engineering Education".

3. Hämäläinen K., Haakstad J., Kangasniemi J., Lindeberg T., Sjölund M., 2001, Quality Assurance in the Nordic Higher Education – accreditation-like practices, European Network for Quality Assurance, in Higher Education, Helsinki.

must have acquired at the end of his studies, foreseen areas of competence and professional placement, possible national and international benchmarking),

- the timing, starting from which prerequisites and with which resources these objectives are to be reached.

Responsibility in action

It is up to the programme:

- to verify the correspondence between the professional figure actually produced and the general prospects of the work market,
- to implement instruments to verify the good progression of the teaching programme (student progression in quantity, quality and time),
- to coordinate the different formative experiences, entrusted to the single teachers in the most varied forms (lessons, exercises, seminars, projects, field experience, etc.), check the coherence between these and against the objectives, ascertain the compatibility with the study timing and the available resources (human and material).

Transfer of responsibility

Through these acts, documented in a reliable and verifiable manner, the programme provides the reference institution (Faculty, University) with the elements for judgement that will enable them to assume, with an adequate degree of confidence, the final responsibility:

- for the coherence of the study degree with the professional figure to be formed,
- for the level of the titles conferred in its name (the effective knowledge and abilities of the graduating student),
- for the quality of the training provided to enable the students to reach that level.

Data, judgements and procedures

There are basically three types of instruments, on which an evaluation/accreditation model is based: quantitative indicators, qualitative judgements of experts and organisation system.

An effective evaluation model must resort to a combination these three "types". Moreover, it is general practice that it also includes a significant control element such as the gathering of the opinions of the students.

- *Quantitative indicators*

In the grammar of evaluation, these are like syllables or, at most, like words.

Some quantitative indicators of "performance" are essential. It is appropriate that these be produced at a central level in a uniform and certified way and supplied to the structures to be evaluated or accredited. As they are of a numeric type, they can provide (with due caution for the case) scales or comparisons of a type that are generally perceived as "objective".

They must be collected, processed, correlated and compared in a professional way: in developing a set of indicators, the aim is to find a balance between measurability and relevance for drawing conclusions and making judgements.

- *Qualitative judgements of experts*

In the evaluation syntax these are the sentences that make up the discourse.

Many aspects important for the quality of formative processes cannot, partly or entirely, be conveyed as numbers (e.g. the appropriateness of the objectives or resources, the effectiveness of methods, the results of learning). It is, therefore, necessary to have the professional judgement of experts, usually well-known researchers, professors and professionals.

These experts benefit from maximum credit when they analyse situations that fall into the area of their direct competence. Their evaluation, in such cases is constructive and supports the quality management of the programme.

On the other hand, this process is not so appropriate for setting up scales of comparison, being also slow and costly, and thus it can be replicated only in long periods (for example, every five years).

• *Organisation System*

In this case, the question is whether the system is kept under control in an appropriate way. The results are not directly evaluated, the implicit assumption being that correct management will bring into play all of the control elements that lead to an analysis, shed to light on the weak points, and therefore press forward towards the improvement of the results.

As it is a standardised type of evaluation, it is easier to find experts able to conduct it. But such experts can be deceived on the real nature of what they are examining and, on the other hand, concentrating on purely procedural aspects, they run the risk of wasting time with factors that are not strictly pertinent to the qualities that are perceived as such by the students and academics.

Criteria for evaluation and accreditation: a proposal for the debate.

Universities can be very different, not only from one country to the next, but also among different scientific sectors within the same country.

In addition, the needs of the three levels of higher education are different. The three levels of higher education call for evaluation models based on different approaches.

Level I (bachelor or equivalent) requires a strong emphasis on the legibility of the curriculum (in terms of basic, characterising culture, knowledge and skills, target levels, areas of competence and professional roles envisaged, national and international benchmarking, if applicable) and on organisational aspects.

The evaluation of level III (Doctorate) should be based on the ability to provide a markedly research-oriented learning environment. It is closely interconnected with the evaluation of the research activities of the departments. The evaluation of level II (Master or equivalent) must take into account the fact that learning contents are geared to the highly specific (professional or research) goals of the reference departments. A sizeable majority of international student exchange activities should be concentrated at this level.

This means that the evaluation objectives and criteria which are well diversified but share a common requirement and that formulating a final judgement on each course of study is based on a very narrow final set of key quality aspects.

The latter should be selected so that, in a clear and readily recognisable manner, they go to the very "heart" of the quality of educational activities, which are limited neither to the quality of individual teachers nor to formal managerial procedures, but rather are the overall quality of a an organised collective effort encompassing several fronts.

After the review of the general principles, we should now try to pinpoint a "minimum set" of desirable characteristics that should be present in the evaluation models of level I and level II programmes.

Identifying the "minimum set" of evaluation requirements suitable for programmes of the first and second level, common to all countries and to all scientific sectors, appears to be a reasonable and achievable objective. Such "minimum set" could stimulate discussion about what constitutes good quality within higher education and support the development of a common methodological framework and common quality criteria for comparative international evaluations within higher education programmes.

Basic policy of a programme

A programme should be evaluated on the basis of its ability to put into effect a policy, focusing – clearly and distinctly – on the external and internal "efficacy" of the learning process:

• specify worthwhile learning goals,
• enable most students to achieve the established objectives.

According to a policy of this sort, quality must be interpreted in terms of:

• relevance of the purpose (fitness of purpose),
• fitness for purpose,

with a special accent on "transformation".

The "efficiency" criterion should be seen as a constraint affecting the implementation of the policy, not as a policy in itself; therefore, not as an object of evaluation for the purposes of accreditation.

The mandate of the evaluation

The first and foremost purpose of the evaluation is to reflect the design and management of a programme: the evaluation checklist should express the set of minimum aspects, and the main factors thereof, that the programme should use before it is submitted to an external evaluation. The latter shall be conducted on the basis of the same checklist.

The self-evaluation document, as reviewed and commented on by external evaluators, shall be used by:

* the management of the programme, with a formative and summative function relating to all the individual actions that put the policy into effect,
* the university that has entrusted the programme with the task of conferring in its name an academic degree corresponding to effective qualifications,
* government bodies and third parties for the correspondence between the qualifications and the academic degree,
* partner universities, in our particular case those included in the European circuit, for purposes of mutual recognition, in particular within the countries signatories of the Bologna declaration,
* all interested parties: by facilitating academic and professional recognition, by promoting informed judgements about qualifications that can be understood in another educational context, by promoting the employability of graduates at national and international level. (*see Diploma Supplement and Lisbon Convention*[4]).

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4. Council of Europe and UNESCO "The Convention on the Recognition of Qualifications concerning Higher Education in the European Region" Lisbon 8–11 April 1997.

Vision is needed: policies for evaluation and accreditation should not remain scaled down to local perspectives and to threshold requirements.

The focus of the judgement

The instruments of the external evaluation are:

* *indicators with summative functions*: in particular, indicators of intake, progression, success of the student and of the graduates,
* *experts' judgements* with both summative and formative functions, on the aspects and factors required by the model.

The organisational system, which is highly variable from one case to another and is always developed over several levels (programme, faculty, university), should be left in a free format and should be evaluated ex-post, in terms of its suitability to support those actions having a bearing on the internal and external efficacy of the programme.

Thus, it is sufficient to ensure that the following indications are provided for each aspect / factor envisaged by the model:

* it must be absolutely clear which person or committee is responsible for the policy, the quality and the execution of all educational matters relating to a given study programme,
* that those responsible discharge their duties competently and on time,
* that each action is documented in a pertinent and accessible manner.

In other words, that the effectiveness of an organisational system is evidenced by the description of the actions and their documented effects, factor by factor.

Changing the philosophy of the self-evaluation report

Our proposal is to discard the logic and practice of periodic "evaluation reports" and adopt a logic of on-going monitoring: it is desirable that each programme be required to keep and regularly adjourn an "information model" that collects and updates the quantitative parameters and the qualitative descriptions enabling other parties (e.g. academic

authorities, third parties and external evaluators) to formulate an informed judgement.

This "information model", which preferably should be made fully known to the public, can be flanked by a "self-evaluation supplement", reserved to evaluation authorities, discussing the strengths and weaknesses of the programme.

The structure of the information model

The different items to be considered in evaluating a programme can be grouped into four key "aspects" or "dimensions" of the evaluation:

• Requirements and objectives
• Teaching, learning and assessment
• Learning resources
• Monitoring, analysis, review

An appropriate quality assurance mechanism will be present if these four aspects are managed effectively by the programme.

Each "aspect" is clarified through a certain number of "factors" separately indicated, even though it will be of great value to consider their interconnections (e.g., the *structure and content of the programme* must be described as a logical expansion of *ensuing general educational objectives, benchmarking*).

The contents of the information model

Let us examine the most critical factors.

• *Requirements*

The first aspect of the model is "Requirements and objectives". In order to determine the requirements, it is necessary to identify clearly the parties concerned.

In some instances, it is possible to stipulate a veritable alliance with the world outside the university as a valuable aid to overcome deep-seated habits and to increase public awareness of the logic underlying the programme.

• *Educational Objectives*

The translation of the "requirements" factor into "educational objectives" is performed by the university; it uses the know-how and the *language of*

training specialists; it consists essentially of harmonising the knowledge building processes and learning outcomes that meet the requirements.

This is the point at which it is necessary to reflect critically on the strategies, make choices, and clearly express justifications for the chosen priorities.

The best guide currently available for the formulation of learning outcomes is provided in the "Benchmarking Statements" by the QAA. This document could perhaps be adopted as the starting point for the definition of educational objectives, in terms of contents and levels.

• *Teaching, Assessment Methods*

Once the educational objectives of the programme have been identified and deployed as specific objectives of the individual courses of study, the teacher is provided with great freedom of action as to the methods to be employed in order to achieve them and to ascertain whether they have been achieved.

The teacher and his/her course of study represent a complex system, whose management requires competencies of a technical-scientific nature as well as pedagogic and social competencies.

Effective system operation hinges on a diffused propensity to reflect, i.e., the ability of each teacher to observe the effects of his/her actions and to make appropriate corrections, as necessary.

People are the fundamental element in the quality of services, especially those involving a high content of expertise. But assessing people using objective criteria is by definition very difficult, and this is especially true for professionals in higher education. It is advisable, however, to prevent teachers from proceeding by trial and error. This can be done through specialist training programmes for newly-hired teachers, to enhance the pedagogic and teaching skills they need to manage the classroom and apply the assessment techniques competently.

An effective way to assess the behaviour of a teacher ex-post is to verify the contents of the examinations in order to determine the knowledge/skills they are designed to assess, and the marking

criteria adopted. In other words, to determine whether the tests ascertain the presence of the knowledge/skills required (and made known beforehand), avoiding both false negative and false positive results.

The collection of student opinions by means of questionnaires or other equally effective ways is a complementary method that can supply useful indications.

Breaking down the "factors" into their constituent "elements"

A working description of the factors is provided by breaking them down into their "elements"; an overview of the evaluation modes supplies many interesting indications.

A list of common elements helps to make the evaluation reports more comparable; however, it is advisable to leave freedom of choice in the selection of the elements making up a factor. At this level, a holistic approach stressing the interdependence between the elements and their complementarity should be encouraged.

Accordingly, while, as a rule, it will not be possible to accept compensations between the factors of an aspect, it is reasonable to consider the possibility of compensations between the elements that, taken together, add up to a factor.

Thus, the information model will reveal that the programme is much more than a static configuration of components or a mere list of actions. Indeed, it is a self-organised structure, susceptible of

evolution and development, to be assessed on the basis of clear and explicit criteria.

Conclusion

It is desirable that each programme be required to keep and regularly adjourn a public and on-line "information model" with a view to:

- enabling any competent authority or party to ascertain whether the quality of the qualifications issued by the institution justifies recognition,
- enabling prospective students and employers to formulate informed judgements about expected qualifications and means /resources made available by the programme to support the learning process.

A programme should be evaluated on the basis of its ability to put into effect a policy focusing – clearly and distinctly – on the external and internal "efficacy" of the learning process.

An appropriate quality assurance mechanism will be present if the following four key "aspects" or "dimensions" are first of all described in the "information model" and then kept under control in an effective manner by the programme:

- Requirements and objectives
- Teaching, learning and assessment
- Learning resources
- Monitoring, analysis, review

The "key aspects" and their articulation in "factors" may be the basis of an agreed "minimum set" of requirements for the information model.

2 Country Cases

2.1 AUSTRIA: Accreditation in Austrian Fachhochschule Sector

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1. Austrian FH-sector

The Austrian FH sector has a short history and is still being developed:

- The Fachhochschule Studies Act became effective on 1 October 1993.
- The first 10 programmes started in the academic year 1994/95.
- Currently there are 19 institutions offering 144 programmes and about 22.000 students (2007: about 28.000).

The whole sector has been completely anewly developed since 1994, combining (public) top-down control and (private) bottom-up initiative → education is not offered by transforming existing educational institutions but by accrediting new programmes.

Framework conditions:

- The course providing bodies are – with two exceptions – privately organized (legal persons under private law, e.g. companies with limited liability, associations or public foundations)
- Public funding
- External Quality Assurance by the FH Council
- The legal control is with the Government.

2. Austrian FH-sector

FH institutions are given greater autonomy to organize themselves

- Decentralisation and deregulation of decision-making process
- To foster the independence, responsibility and flexibility of the FH institutions

Financing concept of study place management

- Costs per study place and year are about 7.600 EURO in technical fields and about 6.400 € in the business fields
- Federal government pays only 90 % of the standard costs per study place (6.900 resp. 6.400 €)

The Amendment of the FH Studies Act of May 2002 facilitated the introduction of bachelor and master programmes:

- Duration of study: Bachelor = 3 years (180 Credits); Master = 1 to 2 years (60 to 120 credits); Diploma = 4 to 5 years (240 to 300 credits)
- The first bachelor programmes started in the academic year 2003/04; the first master programmes will be started in 2004/05.

3. Austrian FH sector

Educational mandate: practice-oriented professional education at higher education level. Basic concept of a FH programme can be characterised as follows

- Description of the vocational fields of activity for which the programme is aimed;
- The professional field-specific requirements have to be presented in the form of a qualification profile;
- This qualification profile forms the basis for the design of the curriculum.

The review of the coherence of vocational fields of activity, qualification profile and curriculum by a FH degree programme plays a very important role in the accreditation procedure.

4. External quality assurance system

FH Council is the public authority responsible for external quality assurance. All FH programmes (Bachelor´s, Master´s and Diploma programmes) are subject to accreditation. Accreditation is granted for an approval period of a maximum of 5 years.

Tight connection exists between decisions on initial- and re-accreditation of programmes and evaluation of programmes and institutions

- Initial accreditation is compulsory in order to get an approval for a FH programme (accreditation is equivalent to approval);
- The decision on initial accreditation is carried out by the members of the FH Council themeselves;
- Each decision of the FH Council on the re-accreditation of programmes is based on a previously conducted evaluation.

5. Accreditation in the national context

Evaluation = quality improvement? $\leftrightarrow$ Accreditation = quality control?

No $\rightarrow$ Accreditation = Evaluation + decision on quality + approval

Accreditation

- is a formal and independent decision, indicating that a program offered and/or an Higher Education Institution is meeting certain standards;
- is based on a previously conducted evaluation procedure that estimates the value or benefit of measures with respect to the compliance with certain standards;
- includes quality improvement according to the evaluation results;
- ends with a positive or negative decision.

Aim of accreditation

- to assure that the institutions meet their responsibility for the quality of the programmes offered;
- to guarantee students, society and employers that the programme has to undergo a quality assurance procedure before it is approved or re-approved.

6. Initial accreditation

Programmes are designed on behalf of the course providing bodies by expert teams with the required academic and professional qualifications. An application for initial accreditation/approval of a programme is submitted to the FH Council according to the "accreditation guidelines".

The applications are examined by the office of the FH Council and by the members of the FH Council in plenary meetings.

- if there is no expertise in the FH Council, written expert opinions are asked for;
- the accreditation procedure has to ensure that the legal prerequisites are met;
- requests by the FH Council to take certain measures to improve the quality of the programme are part of the procedure.

Since 1994, about 40 % of the applications have been rejected by the FH Council. The most important question that needs to be answered positively for an (initial) accreditation is whether the programme is able to fulfil its educational mandate in a reliable and transparent way.

7. Re-accreditation

Fields of institutional and degree programme-related evaluation

No	Fields of institutional evaluation	No	Fields of degree programme-related evaluation
1	Strategy and organisation	1	Educational goals and teaching methods
2	Quality management and HR development	2	Students
3	Degree programmes	3	Organisation and quality assurance
4	Students	4	Human resources
5	Applied research & development	5	Infrastructure and applied research & development
6	Resources, infrastructure and funds		
7	Internationalisation, co-operation and communication		

The aim of self-evaluation

To show in a transparent, well-founded and reliable way how the aims, requirements and expectations as defined in the fields to be evaluated are met.

The aim of external evaluation

To evaluate, on the basis of the self-evaluation, whether the aims, requirements and expectations as defined in the fields to be evaluated have been convincingly and transparently fulfilled.

8. Re-accreditation

Examples of institutional evaluation

8.1	Strategy and organisation
8.1.1	The FH institution has a clearly formulated strategic orientation that has been put forth in a public mission statement. It sees itself as a learning organisation and ensures the advancement of the institution based on its strategic orientation.
8.1.2	The mission statement lays down the educational and research goals and serves to position the institution within the academic and social environment. The desired goals are appropriately communicated within the institution.
8.1.3	The decision-making processes, competences and responsibilities are clearly defined, communicated and implemented. The implemented organisational structure and procedure ensures the institution's autonomy and is critically reviewed regarding its efficiency and effectiveness.
8.1.4	The organisational structure and procedure ensures that the faculty is integrated in the decision-making processes related to study and research and that the students are integrated in decision-making processes related to education. The faculty's autonomy is ensured in a way that is appropriate for a higher-education institution.
8.1.5	The creation or promotion of a corporate identity is ensured. Based on the exchange of knowledge between the experts in the fields of teaching, research, business, administration, etc. who work in the FH sector, the process of knowledge management is organised.

9. Re-accreditation

Examples of programme-related evaluation

9.1	Educational goals and teaching methods
9.1.1	The educational goals have been clearly defined and everybody involved is familiar with them. The connection between the vocational activities, the qualification profile, the curriculum and the teaching concept has been described in as conclusive way and documented transparently.
9.1.2	Placements form an integral part of the curriculum. The educational goal of the placement has been defined and everybody who is involved either in the institution or in the company is familiar with it.
9.1.3	The process of selecting, qualifying, tutoring and assessing the placements is defined and implemented accordingly. The working relationship between the FH institution, the company and the students has been defined in a contract.
9.1.4	The knowledge and skills to be acquired in an FH degree programme based on the vocational and higher-education requirements are documented in a sufficient and transparent way within the scope of a qualification profile.
9.1.5	The curriculum provides the relevant scientific knowledge and understanding, the methodological-analytical skills, as well as the multidisciplinary qualifications to be able to meet the aims related to the vocational field in a way that is adequate for a higher education institution.
9.1.6	The selection of the related disciplines is justified and the relation of the respective discipline to the desired vocational field is described.
9.1.7	The contents of the curriculum as well as the teaching methods used to implement it are suitable for reaching the educational goals set forth. The proportion of the different types of courses (lectures, training courses, seminars, placements, projects, etc.) is balanced with regard to the educational goals. The acquisition of active competences typical of higher-education institutions and vocational competences is encouraged.

2.2 FINLAND:
Accreditation Models in Higher Education in Finland: Experiences and Perspectives

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The Finnish Higher Education Evaluation Council

The Finnish Higher Education Evaluation Council (FINHEEC) is an independent expert body assisting universities, polytechnics and the Ministry of Education in matters relating to evaluation. The scope of the activities covers 20 university level institutions and 29 polytechnics.

The main objective of FINHEEC is long-term development of higher education through evaluation. The main duty of the Council is to assist higher education institutions and the Ministry of Education in evaluations, and to develop evaluation procedures in higher education institutions nationwide. Consequently, the Council strongly emphasizes the role of the higher education institutions in evaluations as well as a communicative evaluation approach in its evaluation projects.

FINHEEC is appointed by the Ministry of Education for a four-year period. The duties of FINHEEC are based on a Decree (1320/1995), which stipulates the duties to the Council:

- Assisting institutions of higher education and the Ministry of Education.
- Conducting evaluation for the accreditation of the polytechnics.
- Organising evaluations of the activities of higher education institutions and evaluations related to higher education policy.
- Initiating evaluations of higher education and promote their development.
- Engaging in international co-operation in evaluation.

- Promoting research on evaluation of higher education, and
- Evaluation and acceptance of professional courses offered by higher education institutions, entering of courses into a register stipulated in Article 14 of the Decree on the Higher Education System and maintaining such a register (Decree 456/98).

The types of evaluations conducted by FINHEEC can be categorised as follows:

1. Evaluations of official nature
- accreditation of polytechnic operating licences
- accreditation of professional courses offered by higher education institutions
- evaluation of applications to award polytechnic post-graduate degrees

2. Evaluations initiated by FINHEEC
- evaluations of higher education institutions: institutional evaluations, audits of quality work
- programme and thematic evaluations

3. Evaluations commissioned by the Ministry of Education
- selection of the Centres of Excellence in Education and Adult Education in the university sector and Centres of excellence in Education and Regional Impact in the polytechnic sector to be used in performance-based appropriations.

The introduction of accreditation into the higher education sector in Finland is one element in the national quality assurance system. However, enhancement and assessment of the quality of education has so far been seen as more important than accreditation. Two models, illustrating how FINHEEC is involved in accreditation-like practices, will be discussed in the text below.

Accreditation of Professional Courses in Higher Education Institutions

In 1998, FINHEEC was assigned the task of assessing and registering professional courses organised by higher education institutions. The term "accreditation of professional courses" is commonly used about this type of evaluation. The Ministry of Education appointed a subsection, the

Accreditation Board of Professional Courses, whose task is to assess professional courses (in continuing education) of at least 20 credits by volume and make the decisions of accreditation. The Board consists of 12 members, who represent universities, polytechnics, working life and student unions, of both the university and polytechnic sectors.

Accreditation of professional courses is a process that gives public recognition or registering to professional, non-degree courses meeting certain standards/criteria. The accreditation process includes a review of relevant documentation (application), a visit to the university/polytechnic and the immediate feedback after the site visit. The Board has seen it necessary to also use external experts in the process. However, the final decision is done by the Board. When accrediting professional courses, the Board has set the criteria for good practices. The decision is usually done on a yes/no (registered/not registered) basis. Sometimes the decision for registration can be conditional. In this case, the applicants are given a certain time period (1–2 years), during which the needed additions or amendments have to be carried out. Evaluated studies are always assessed in terms of the criteria, not for example of other studies of the same field. Feedback and recommendations for the course are provided after the registration decision is made.

Accreditation of Professional Courses includes the following steps:

- An application form, designed for accreditation purposes, is available for the applicants (higher education institutions) on FINHEEC's website (http://www.finheec.fi/erikoistumisopinnot). The institution fills in the application and applies for the accreditation on a voluntary basis.
- After receiving the application, the Accreditation Board appoints two (or three) external experts to conduct a site visit to the higher education institution. During the visit they discuss with different stakeholder groups. Typically the team consists of two members, an expert on the contents of the professional course and a senior adviser from FINHEEC, acting as a pedagogical expert.

- During the site-visit to the organiser of the course, the following aspects are analysed:
  – Basic requirements
  – Course contents and objectives
  – Educational process
  – Educational arrangements
  – Practical arrangements
  – Cooperation with the working life
  – Quality assurance
- After the site visit the experts make a proposal for acceptance (yes/no) to the Accreditation Board.
- The Board uses the evaluation criteria to make the final pass/fail decision. The main groups of the criteria are: requirements, work-orientation, contents and objectives, the educational process, pedagogical arrangements, practical arrangements and quality assurance. Special criteria are used for the professional courses taught in a foreign language.
- Higher education institutions receive the decision within four months of the delivery of the application. Together with the decision a written feedback with strengths and developmental aspects of the professional course is given to the applicant.
- The registration of accredited courses is valid for 4 years. The register is available on FINHEEC's web-site.
- A separate form should be filled for each professional course applying for re-registration.
- The decision by the Board costs 1005 € for the organiser of the course.

There are 72 courses/applications that have been evaluated by the Board in the years 1998–2003 and three applications are currently under evaluation. 22 applications are from the universities and 53 from the polytechnics. More than 50 % (N= 41) of the applications were from the field of Health care and Social services. Eight applications were from the field of Business Economics (for example MBA-programmes) and 5 from Management. 21 applications were from different fields of studies, such as Education and Engineering.

About 66 % of the professional courses have been approved to be registered. The number of ap-

plications is very low compared to the amount of the professional courses organised by the universities and polytechnics. For example, in 2002 there were more than 300 professional courses offered by the Finnish universities.

Accreditation of Polytechnic Operating Licences

In 1995 the Finnish Government defined the strategy for carrying out the polytechnic reform with the aim to establish the polytechnic system by 2000. The goal of the reform was to establish a new kind of degree with practical orientation to educating professionals for expert and development posts, while the basic mission of universities is to carry out research and provide education based on it. The polytechnics were formed on the basis of post-secondary vocational institutions by raising their standards and by merging several institutions to create multi-field polytechnics. In creating the polytechnic system, emphasis was laid on multidisciplinary, regional institutions, which give particular weight to contacts with business and industry.

The polytechnic reform was based on an experimental phase of 1991–1994. Each new polytechnic had to be preceded by an experimental and developmental stage. The basic assumption was that licences for permanent polytechnics would only be granted after they could demonstrate high quality and good performance during this experimental stage. The core of the strategy would thus be constant development, and gradual attainment of permanent status.

The Finnish Higher Education Evaluation Council assisted the Government in the accreditation of the polytechnics. FINHEEC evaluated applications made by the polytechnics for accreditation and establishment. A separate Accreditation Subcommittee was established. The Members of the Accreditation Subcommittee consist of the representatives of polytechnics, teachers working in the polytechnic, students and representatives of working life.

Operating licence evaluations were made to ensure that new polytechnics and the education they provide, meet the quality criteria for higher educa-

tion. Each evaluation incorporated proposals for measures to develop the particular polytechnic's operations. If an experimental project failed to meet FINHEEC's criteria, a new application had to be submitted the following year. This meant that evaluation of operating licence applications comprised a process of great significance for educational development throughout the sector.

In 1995 and 1996, the accreditation and extension of polytechnics were evaluated on the basis of applications. Since 1997, site visits have been added to the procedure. The Accreditation Subcommittee has compiled public reports of each evaluation and, since 1998, these reports have been published in the FINHEEC publication series.

The criteria used in the accreditation of permanent polytechnics mainly include proven excellence in experimental and development work. The following framework for criteria was used in the assessment, of which 1–12 are mentioned in the Polytechnics Act:

1. The operating principle (mission)
2. The topicality and need for the planned degree programmes
3. How well the sectors of study fit together
4. The main area of strength
5. Adequate size relative to educational function
6. The qualifications of the teaching staff
7. Library and information services
8. Relations with the working life
9. Cooperation with universities/other polytechnics, and with other educational institutions
10. International cooperation
11. Educational and service function in the region
12. Arrangement of evaluation
13. The learning environment
14. The working environment

Some of the granted licenses in 1998–1999 included special development obligations. These were cases when the Government approved a polytechnic's licence, although according to the evaluation made by FINHEEC's Board, it didn't measure up to the demanded quality. Accordingly, the license was granted, but the set obligations had to be fulfilled and later evaluated by FINHEEC's Board.

This evaluation task formed a major part of the work of the Accreditation Subcommittee in 2000-2003. Polytechnics with special development obligations had to give a report on the results of their development work, separately of each dimension of given development tasks. In other respects the evaluation process followed mainly same phases and principles as that of the previous evaluation of the permanent operating licences.

Furthermore, the Accreditation Subcommittee has implemented evaluations when there has been a change in the scope of activities of an accredited polytechnic, or in the event new educational establishments (former independent institutions) have been incorporated with it. Since August 2000, all 29 Finnish polytechnics have been permanent.

Discussion

Accreditation is seen as one of several complementary measures in the Finnish quality assurance system, whose starting point is to support higher education institutions in the development of good quality. One special character in FINHEEC's evaluations is that accreditation has related only to the evaluations of official nature: accreditation of professional courses in higher education institutions and accreditation of operating licences of the polytechnics. The other feature common in accreditations applied by FINHEEC has been the integration of a developmental aspect, which is in accordance with the FINHEEC principles. There is evidence that combining accreditation with developmental approach is useful to the higher education institutions when developing their activities.

The accreditation of professional courses is voluntary to the universities and polytechnics. However, the evaluation, accreditation and registration of professional courses serve the universities, polytechnics, students, the working life and the society in general, by aiming to ensure that the registered studies have a certain, generally approved level of quality, a "quality label". At its best, the accreditation process can be important tool in developing the quality of the continuing education.

In 2003 the Accreditation Board has done a survey on the impact of the accreditation processes to the development of professional courses at the higher education institutions. The questionnaires were sent to all those universities and polytechnics (N = 64) whose professional courses were evaluated in 1999-2002. 75 % of the institutions replied. According to the survey, the evaluation process and the written feedback has been an important tool especially in the development of the planning process and structure, objectives and contents of the curriculum of the professional course. There also seems to be a positive transfer impact to the development process of other professional courses in the institution than simply to those been accredited. Additionally, according to the survey the polytechnic sector has used the accreditation of professional courses to strengthen the experimentation of polytechnic post-graduate degrees. The professional courses can be partly integrated to the post-graduate degrees of polytechnics. The registration period (4 years) of the professional courses that were accredited in 1999 will end in 2003. It is now time for a re-accreditation process, which is similar to the first-phase accreditation.

The type of accreditation applied in the evaluations for the accreditation of the polytechnics represents quality assurance that is implemented *ex ante*, that is, before the start of the polytechnic's educational activities. Developmental aspect in this process was realised in two ways: the institutions applying for a polytechnic operating license received a feedback consisting of strengths and areas to be developed. Then a follow-up was organised. Many institutions worked for 2–3 years to reach the standards set for a polytechnic status. Now that this unique accreditation process is completed and the polytechnic sector is established, it can be estimated that the process has been useful to the polytechnics. Two very important results of the accreditation of polytechnic operating licences, the culture of quality assurance and a strive for continuing development, have emerged in the polytechnics.

2.3 FRANCE:
Evaluation and Accreditation Practices in France.
A Powerful Tool for Improving Quality in Engineering Education

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Our topic is the evaluation and accreditation of engineering curricula, specifically arising from the years of experience of French accreditation in engineering (Commission des Titres d'Ingénieur – CTI). The CTI exerts its activity from outside the institutions (Grandes écoles, university engineering schools) and has defined a set of references, relevant evaluation criteria and techniques necessary for the accreditation process. The objectives are to:

1. Modernize and internationalize of engineering training;
2. Close the gap between 'products' and 'needs' by a strong involvement of industry;
3. Develop a constantly reviewed accreditation system;
4. Search for excellence to attract the elite.

Quality management can be a means to improve the quality of teaching and learning, and the evaluation process by external body with a view to accreditation.

The Commission des Titres d'Ingénieur was appointed by an Act of 1934. Its aim is to accreditate the Ecoles d'Ingénieurs and to award the title of 'Ingénieur diplômé'. Total education and training duration is five years and equivalency is given to a Master degree. The Ministries of Education, Industry, Defence or Agriculture subsequently take up CTI's recommendations for their public institutions and attribute the budget and personnel. Private institutes make their own decisions.

The CTI has 32 members. Half of these hold positions in higher education or are members selected for their scientific or technical experience. The other half represents the various aspects of the profession. This twin composition is particularly interesting as it brings together engineering trainers with experts, representatives of the professions and of industry as well as representatives of the main trade union organizations and engineering associations. Members are appointed for 4 years, which is renewable once. The CTI meets 11 times a year in plenary sessions.

Any public or private institution that has a higher level course of training in science or technology for specific vocational purposes can apply for the course to be awarded the title of "ingénieur diplômé".

The Commission then appoints reporters amongst its members and possibly also experts. A mission is organized to study the teaching program, meet the management and teaching teams, the students, employers and former students, and to inspect the teaching facilities and laboratories. The report is presented to the CTI, who pronounces its opinion or decision (private institutions).

Following an experimental phase in 1990–1995, general recognition for a fixed term of maximum 6 years was established in 1997. The CTI is empowered to intervene at its own initiative. The courses in the 250 institutes, which together grant 30 000 degrees per year, are periodically evaluated.

The engineer: job, experience and training

What does an engineer do?

Essentially the job of an engineer is to identify and find solutions to problems of a concrete and often complex technological nature related to the design, realization and use of products, systems or services. This aptitude arises from an ensemble of technical knowledge on the one hand and economic, social and human experience on the other hand, with a basis in sound scientific training.

The main areas of activity for engineers are in industry, construction, agriculture and the service industries. This activity mobilizes human, technical and financial resources, usually in an international context. It receives economic and social sanctions and is concerned with protecting man, life, the environment and the collective well being.

What training does an engineer receive?

Training does not just involve mastery of a tool or a computerized approach to problems. The notion of technological purpose has been changed by the increasing importance of computerized simulation, which in turn leads to the need for a high level of skill in modelling and optimization techniques.

Programs

- *Course content*

An engineer requires multidisciplinary training, proof of his/her ability to handle the various missions with which he/she will be entrusted during the course of his/her career. The training course should include:

- Detailed teaching of basic science that may well include a first research experience
- Full training in general engineering techniques, including mastery of complex systems.
- A sufficiently long course in the main aspects of the desired training
- General education: foreign languages; economic, social and human sciences, a concrete approach to problems, communication, ethical issues, social relationships in all contexts
- Training for the industrial environment and the constraints involved, in particular with regard to the environment, safety, health, quality, globalization, and industrial property.

- *Duration*

- An initial training of three years of 2 200 to 2 700 supervised hours – taught classes – directed study – practical tasks and projects.
- By initial apprenticeship: 1 800 hours plus 6 months per year in a company – 3 years (plus 2 years external or integrated experience and scientific higher education).
- By in-house training: 2000 hours formal teaching; professional experience is taken into account.

In-company placements (internships) as part of the training of engineers.

The CTI regards giving student engineers an awareness of industry as an essential part of this type of training. It is important that a training course should have a well-balanced content: advancement in knowledge and relevance to the structure of the industry and the job in question. The accumulated length is between 20 and 36 weeks.

International awareness

Multicultural awareness is a basic requirement for the practice of engineering skills. This means that the curriculum should include, alongside the practice of foreign languages, the development of institutional exchanges between France and other countries. The CTI also encourages growth in the number of foreign students accepted onto engineering courses leading to a Master's Degree.

Agreement for mutual recognition of an engineering degree between the CTI and the CCI dated 21/10/99

Recognition / accreditation of training programs in engineering is a key element to the practice of the engineering profession in any country. Representatives of the CTI and the Conseil canadien des ingénieurs (CCI) met several times in 1998 and 1999 and took part in accreditation / recognition missions in France and Canada.

Bologna agreement and students mobility

European Ministers of Education have signed the Bologna Agreement. This agreement stipulates three levels for the delivery of higher education degrees: three years, five years and eight years at the doctorate level. However, this agreement does not stipulate anything about the content of the degrees and has no specific indication about engineering studies.

Usually, European institutions plan to deliver a 3-year degree similar in level and specifications to the bachelor's degree of the American engineering schools and after 5 years a degree at the level of the

master's degree in Sciences or in engineering sciences.

But many engineering studies in France are organized using a 2–5 years system. After the secondary school, students who have obtained good marks in mathematics and physics may enter "Classes préparatoires" for a two years cycle where they receive a strong general education in mathematics, physics, chemistry and, eventually, life sciences: roughly 1800 hours of education in basic sciences useful for engineering studies. The program of these "classes préparatoires" is the same in the whole France.

The regular duration of studies in such engineering schools is three more years, including roughly 2000 hours of courses in specialized sciences, technology, engineering projects, management and social sciences, foreign languages (in English a level equivalent to TOEFL 550 is mandatory), and at least 4 months of engineering practical stay in industry.

Every institution has to adopt the ECTS system. It facilitates entry of 2, 4 or even 6 semesters after secondary school and from foreign institutions and universities. The Diploma Supplement is under development.

Gateway to working in industry

The institutions should give priority to four methods of reinforcing the student's capacity for innovation, initiative, entrepreneurial skills and rapid insertion:

1. Alternation

The study time is divided between training in an institute and in-company training. The company training is based on a more inductive method, allowing the young trainee to acquire practical know-how that will facilitate his/her integration into the company culture. Alternation can take a number of very different forms and applies both to engineering training courses and to apprenticeships.

2. Project-based learning

Engineers are encouraged to work alternatively in 'hierarchical' mode and in 'project' mode or both at the same time. Group work around a project is very close to the professional situation. It shows the typical development of a project, how it is evaluated and the typologies: initiation, case study, response to specifications, transversality, bibliography, etc.

3. Use of new technologies

Another teaching method needs further reinforcement: the use of techniques for information and communication in teaching on engineering training courses.

4. Professionals in the institute

The decision whether or not to appoint professionals as teachers is made by the center for recruitment of specific permanent posts and the solutions are worked out individually in each case. This makes it possible to transmit professional competence.

CTI criteria

Presenting a summary of the CTI criteria is not easy, as the standard of training has to be measured against the aims and objectives that each training institute has set itself. The points in common in all the courses are:

1. General presentation of the establishment
2. Curriculum
3. Human resources and scientific environment
4. Finance, equipment, etc.

Various assessment tools are used. For example it is possible to give a more in-depth assessment of an establishment and its training programs by applying more detailed criteria graded from mediocre to very good (1 to 5).

Conclusion

In conclusion, the practical efforts of the Commission des titres d'ingénieur have produced some remarkable results.

1. Its verdicts on whether or not institutes should be accredited have been accepted and recorded by the responsible ministries without exception since its creation.

2. The CTI has defined orientations and references that are recognized and accepted by all the parties concerned.

3. The CTI has the role of an advisor rather than that of a censor. It is there to influence and improve the results of institutes, to encourage innovation and attract the best people.

4. The CTI encourages alignment with other national systems of recognition or accreditation to facilitate mobility for young people and help them evolve in their professional life.

5. The CTI experience may well answer to some questions raised by Viviane Reading: How to create the conditions within which universities can attain and develop excellence? How to establish closer cooperation between universities and enterprises?

2.4 GERMANY:
Quality Assurance and Accreditation in Germany

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Developments in quality assurance in Germany and at European level

In Germany the Federal States *(Länder)* are responsible for the shape and development of higher education and research. The responsibility for the contents and organisation of studies and examinations as well as for the quality of higher education is in principle with the *Länder*. It has been until recently finally implemented by the licensing of programmes and definition of the requirements of the exams. According to the Higher Education Framework Act, proposals for standards of study courses and degrees as well as for their mutual recognition have been for a long time made by framework regulations for studies and examinations (*Rahmenprüfungsordnungen*), which had to be jointly adopted by the *Länder* and the *Hochschulrektorenkonferenz (HRK)*.

The creation of these framework regulations has proven to be an extraordinarily ponderous procedure, often taking many years and producing results which, at the time when they finally were adopted, had already become inefficient because of new developments and therefore proved to be counterproductive, especially with regard to study programmes competing in the international market.

Whereas, quality assurance in teaching in Germany was primarily performed through quantitative regulations by the state in the way of *ex-ante* control, other countries increasingly pursued quality assurance in teaching on the basis of evaluation results (*ex-post* control). Following the international development and with a growing awareness of the necessity of quality assurance, a change of paradigm was claimed in Germany. Based on recommendations of *HRK* and *Wissenschaftsrat,* since the mid-1990s evaluation procedures for teaching have been introduced with the goal to increase transparency, strengthen institutional responsibility, support higher education institutions in the introduction of systematic quality-promoting measures as well as advancing the profile, image and competitiveness of German HE.

Since the beginning of 1998, the HRK runs a three-year national programme to enhance the exchange of information and experiences in the field of quality improvement measures in German HE – the Quality Assurance Project. Moreover, in recent years evaluation agencies have been established on regional level either by the federal states or by associations of universities. Besides the above mentioned activities, a lot of departments in many HE institutions have started evaluation initiatives using different approaches and different perspectives.

As a part of the process initiated by the Sorbonne Declaration and advanced by the Bologna Declaration as well as the Prague Communiqué, it has become clear that the structure of studies and degrees in the European Higher Education Area in the future will be shaped by "two main cy-

cles" and that the scientific community will have to play an important role in the field of quality standard development and assurance. The goals are to promote international quality standards, to advance and secure student and graduate mobility, and to improve the employability of graduates on an international labour market.

Introduction of BA/MA study courses and accreditation

The amendments to the Framework Act for Higher Education (HRG) of 1998 opened Germany's higher education system for the implementation of trends and developments at European level. Germany's higher education institutions were given the opportunity – initially for a test phase, currently as a normal case – to introduce degree courses leading to the internationally-recognised academic degrees, namely Bachelor and Master. This process especially aims to

- raise the flexibility of study programmes offered,
- improve the international compatibility of German degrees, and thus
- increase student mobility and demand of foreign students for study places in Germany.

The introduction of two cycles aimed at restructuring and reforming the system of programmes in HE in Germany. Highly adaptable and very flexible contents and time structure should enable HE institutions to meet more effectively than in the past the various and constantly changing demands of science and education, of professional practice and of the students. As a consequence, a quicker and more flexible procedure for quality assurance was necessary. Considering, in addition, the tendency to provide the HE institutions with more autonomy, the system of detailed state control was reduced and accreditation as a new means of quality assurance was introduced.

Accreditation aims at guaranteeing the national and international recognition of (academic) degrees and, at the same time, at providing higher education institutions, students and employers with a reliable guide to the quality of study programmes

and degree courses. Accreditation is a flexible tool with which quality assurance in the fields of studies and teaching can be organised. Beyond that higher education institutions can use the preparations for accreditation for their own quality assurance activities, while the result can be used for the purpose of international higher education marketing.

The creation and work of the *Akkreditierungsrat* (Accreditation Council)

Being aware of the different areas of competence and responsibility of the state and higher education institutions, the Conference of *Länder* Ministers of Education and Culture decided to stick to a final responsibility of the states implemented by licensing study programmes. However, focussing on quality aspects they decided together with the HRK to create an accreditation system consisting of the *Akkreditierungsrat* (Accreditation Council) and agencies being accredited by the *Akkreditierungsrat* and thus being entitled to accredit BA- and MA-programmes. So the German Accreditation Council has been established by an agreement between HRK and KMK, not by law.

The *Akkreditierungsrat* is responsible for the establishment of comparable quality standards for Bachelor's and Master's degree courses in an decentralised accreditation process. The *Akkreditierungsrat* performs these responsibilities by accrediting, coordinating and monitoring the agencies.

The 17 Members of the *Akkreditierungsrat* are HE institutions' rectors, scientists (among them foreign members), representatives of the states, representatives of the employers and the trade unions and students. The *Akkreditierungsrat* considers student participation in the organisation and practice of accreditation procedures to be desirable as a means of ensuring that their interests are met, and not least as a means of promoting student acceptance of the new degree courses.

The *Akkreditierungsrat* had to develop an accreditation system. Although experience had been gained abroad with the accreditation of degree courses, this was "new territory" in Germany. The

decentralised system with agencies to be accredited and the *Akkreditierungsrat* responsible for the content and procedures, for the equivalency of results was without precedence and therefore the German accreditation system had to be completely designed and realized from scratch. In this process the conflicting interests between the responsibility of the state, the scientific community's competence in matters of course content, the profile- and image-building autonomy of the higher education institutions, and the interests of the labour market had to be balanced. Being aware of the new approval to a quality assurance system, the *Akkreditierungsrat* has understood itself as a learning system being prepared and willing to react to mistakes and to cope with new challenges.

Measures for building an accreditation system

The present accreditation system has to guarantee minimum standards of quality of programmes leading to a BA- or MA-degree. Up to now, the system does not allow to certify a special top quality. In order to be able to meet its responsibilities of providing comprehensive quality assurance and control, the *Akkreditierungsrat* adopted principles and minimum standards which agencies had to meet.

So the *Akkreditierungsrat* has passed some regulations obligatory for the organisation of the agencies: they must be independent from the state, HE institutions, associations of faculties (*Fakultätentage*) and disciplines (*Fachgesellschaften)*, professional associations and business, they shall not be profit-oriented and they must perform accreditation for all types of HE institutions of the states. They have to be organised as a legal entity, having, according to the form of organisation chosen, a body which has the final decision on the application and which has to be composed corresponding to the membership in the *Akkreditierungsrat.*

The accreditation procedure aims at ensuring equivalency, guaranteeing quality, creating transparency and also encouraging and facilitating diversity. Only if the agencies observe a frame of reference, i.e. agreed criteria, standards and proce-

dures, when they accredit degree courses, accreditation results can be regarded to have met the condition of equivalency. One main task for the *Akkreditierungsrat* therefore was to develop criteria to be applied when agencies accredit degree courses. The intention of allowing higher education institutions as much freedom as possible in structuring their courses, without, however, jeopardising the comparability of future study programmes, led to relatively general criteria. In contrast to the somewhat rigid quantitative standards and specifications contained in the framework examination regulations, the criteria now provide a flexible framework for the review of degree courses. Since neither the Bachelor's degree nor the Master's degree are finally defined, standards concerning level and work load had to be developed. In the test phase for the new degree courses, which aims to promote innovation, it seemed acceptable to have only a few criteria serving as a rough orientation.

The accreditation procedure prescribed by the Accreditation Council (*Akkreditierungsrat*) starts with an application. The final decision of the accreditation commission of the agency has to be prepared by peers. The peers have to be selected following certain procedural and quality aspects.

The *Akkreditierungsrat* developed special requirements for the accreditation application. These specifications mainly cover:

- "reasons for the degree course" (e.g. mission statement, goals and aims of the degree course),
- the planned "degree course structure and requirements in terms of content and specialisation" (e.g. organisation, structure and content of the programme, professional qualification of graduates on the basis of a consistent and coherent programme, assessment of the foreseeable developments in potential field of labour market),
- "human, financial and infrastructural resources" (e.g. qualification of the staff, funding of the programme etc.),
- "quality assurance measures" (e.g. data on completion rates, student satisfaction etc.) and

- "study-related cooperation" (esp. concerning international programmes, e.g. cooperation with institutions abroad, students from other countries etc.).

The introduction of the new Bachelor's and Master's degree courses has at the end supported and encouraged growth in the introduction of innovative degree courses by higher education institutions and faculties.

After giving careful consideration to the fact that evaluation and accreditation serve differing goals, the *Akkreditierungsrat* tried to ensure that the various procedures are separated and that evaluation and accreditation are carried out in separate consultative and decision-making committees and on the basis of separate procedures. However, the *Akkreditierungsrat* supported the view that recent evaluation results must be considered in accreditation decision-making.

Accreditation and coordination of agencies

In the meantime, seven[5] German agencies have been accredited and are thus entitled to award the *Siegel des Akkreditierungsrates* (Quality Certificate of the *Akkreditierungsrat*) to the Bachelor's and Master's degree courses of state Higher Educations Institutions. Other agencies, also from abroad, have announced their intention to submit applications.

The *Akkreditierungsrat* guarantees equivalency and quality within diversity by defining minimum standards, certain procedures and organisational structures, by coordinating the procedures practised by the accreditation agencies and by undertaking follow-up monitoring measures. In particular, it monitors the observance of minimum standards of quality and procedure, the implementation of conditions imposed on the agencies as well as the execution of other resolutions adopted by the A*kkreditierungsrat*. The agencies have to report every accreditation of degree courses together with the review report to the *Akkreditierungsrat*. Beyond this, the agencies have to submit an annual report as part of their accountability obligation.

Moreover, members of the *Akkreditierungsrat* may, in agreement with the agencies, attend, as guests, sessions of the agency's decision-making committee or peer-review team sessions. In order to guarantee transparency, the *Akkreditierungsrat* has resolved to make the accreditation decisions public at the end of the accreditation procedure. You can find information on accreditations of study courses (ca. 380[6]) on our website.

Agreement and cooperation in the international field

The *Akkreditierungsrat* introduces and represents German views in international discussions on (academic) degrees, transparency, quality and standards in higher education. Contribution to information exchange and to cooperation in Europe aim at the acceptance of the Quality Certificate of the *Akkreditierungsrat* in Europe and abroad. Agreements on mutual recognition must be reached, in order to avoid multiple accreditations. The goal is to ensure that accreditation achieved abroad should to be recognised in Germany and vice versa.

In order to reach this aim, the *Akkreditierungsrat* maintains contacts with international accreditation institutions and organisations which perform comparable functions and responsibilities. The *Akkreditierungsrat* is a member of the International Network for Quality Assurance in Higher Education (INQAAHE), the European Network for Quality Assurance in Higher Education (EN-QA), the European Consortium for Accreditation (ECA) and the D-A-CH network, the network of accreditation institutions of Germany, Austria and Switzerland. These memberships promote exchange with agencies abroad and help make the Quality Certificate of the *Akkreditierungsrat* known at international level.

The option of accreditation which has become possible as a result of the introduction of an accreditation system has provoked an intensive discussion in the federal states (*Länder)* and higher education institutions on restructuring curricula, contents and on the quality assurance of new de-

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5. Two agencies have merged so that there at the moment (November 2003) six agencies are operating.

6. As of November 2003.

gree courses. Higher education institutions feel encouraged to implement new and innovative ideas.

The system established by the *Akkreditierungsrat* has to be stabilised in the future. The system of accreditation and its results must be made better known abroad and it must be further developed taking into account international developments.

The test phase has been finished by a new statute of the accreditation system in Germany which came into power at the 1st of January 2003. There are some modifications especially concerning the competences of the accreditation system. It will no longer be restricted to the accreditation of newly established BA- and MA-courses, but the range of competence is extended to newly set up Diploma- and *Magister*-courses and to Diplom and Magister courses which shall be fundamentally changed, in subjects for which there are no framework examination regulations or for which the existing framework regulations are out of date.

2.5 HUNGARY: Accreditation Models in Higher Education: Experiences and Perspectives

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Introduction

The paper is a summary of two presentations, the first given at the session on the "Scope of accreditation", the second in "Working methods". Both dealt with the Hungarian experience in quality assurance in higher education. In addition, the first presentation briefly looked also into the practice of accreditation in Central and Eastern Europe, which is described in conclusion.

The Hungarian Accreditation Committee

The Hungarian Accreditation Committee (HAC) was set up by the Higher Education act in 1993, mandating accreditation of all higher education institutions and all their programmes every eight years. The first cycle (at the time of 89 institutions) took place between 1995 and 2001. The HAC's concept of institutional accreditation was based on the premise that the output of higher education institutions was a diploma or degree, and the content behind the degree was the study programme, therefore it must be the object of evaluation. The institution was seen as the environment contributing to the quality of study programmes. The institutional level, in contrast, was not of equal significance because in the social-historical context in which Hungary found itself after regime change in the early 1990s, there was little experience in institutional management, and institutional leaders were selected based on academic merit. Linked to that, legally declared institutional autonomy was in fact limited, with numerous aspects of higher education legislated and severe financial restrictions imposed both by legislation and the amount of money available and allocated to higher education. Thirdly, there was no internal quality assurance in place at the time.

The accreditation decision by HAC pertained, therefore, to a whole institution, all its faculties, and all its study programmes. Roughly one third of the programmes were given "conditional" accreditation, with defined conditions to be met by a set date, reviewed in a monitoring procedure. Some small, new colleges were also given short-term, conditional accreditation and no institution was closed. There was small number of new institutions requesting preliminary accreditation that had to resubmit their application before being granted their request.

In the upcoming cycle of institutional accreditation, beginning in autumn 2004, greater emphasis will be given to the institutional level. Internal quality assurance is in place at all higher education institutions, who send their annual reports, reviewing changes in their institution and programmes as well as quality concerns, to the HAC. The reports will constitute the building blocks for accreditation. A selection of programmes will be reviewed in depth. Whereas in the first cycle, only the ac-

creditation decision and a brief explanation for it, but covering the institutional level as well as the programmes, was published, accreditation reports will now be published in full. The HAC has already launched a pilot procedure in which it evaluates a specific discipline across the board, whereby the same visiting team reviews the study programmes in the given discipline at all institutions in the country within a limited time-frame. The pilot phase, still running at the time of this writing in early 2004, covers the disciplines of psychology and history, and no decision has yet been taken concerning the feasibility of the approach in the future.

The HAC has 30 full members, who are delegated by higher education institutions (the Hungarian Rector's Conference, the Conference of College Directors, and the Conference of Art University Rectors); by research institutes (of the Hungarian Academy of Sciences); and by professional organisations (chambers, unions). There is also one non-voting student member, as called for by the higher education act of 1993. In addition, several non-voting members are invited on a permanent basis to fill in for major disciplines not covered by the delegated members. This is necessary, since the HAC works in a multiple-level decision-making structure both in institutional accreditation and separate programme accreditation procedures. The latter involves the preliminary accreditation of new programmes on the national level (initiated by institutions but issued as national qualification requirements in the form of government decrees); the preliminary accreditation of new programmes launched by institutions (based on the national qualification requirement for the given study programme); and the preliminary accreditation of doctoral schools. Moreover, as noted, programme accreditation is also part of institutional, that is ex post, accreditation every eight years.

The internal procedure for conducting institutional accreditation (which involves visits by a peer review team sent to each faculty and based on the institution's self-evaluation report) is as follows. The members of the HAC plenum head standing expert commissions for main disciplines or discipline groups. As expert commission chairs they recommend the leaders of the review teams. The review team leaders in turn recommend the members of the team, which may include non-academics. The team is approved by the institution to be visited, and approved by the HAC plenum. In the following cycle of institutional accreditation, students will participate in visiting teams. Another difference between the first and second cycles is that in the former the accreditation decision was made on a grading scale of Excellent, Strong, Adequate, and Not Adequate (with excellent being measured against the international standard), which will be discontinued in the new cycle, leaving only a yes/no decision. In both cycles there was and continues to be Conditional Accreditation (technically a yes decision), either if there were not yet any graduates in the evaluated programme or if weaknesses called for a monitoring evaluation, whereby set conditions must be met by a given deadline. The visiting team produces an evaluation report that is discussed by an ad hoc commission, made up of HAC members representing the disciplines evaluated, with a final accreditation report passed as a resolution by the HAC plenum. Prior to the final vote, the institution is given the report for comments. The final report is published.

The selection of evaluators for programme accreditation, which involves evaluation based on a written application, proceeds as follows. The chair of the relevant expert commission for the given discipline (usually a plenum member) recommends two external evaluators, usually but not always academics. A third evaluator may be called upon if the evaluation is not unambiguous. The HAC has a pool of over 500 peers. The expert commission discusses the evaluations and prepares its recommendation for the plenum, which passes the final decision on granting preliminary accreditation to a new programme in the form of a resolution.

With both institutional and programme accreditation, a HAC decision is an "opinion" given to the Minister of Education, who issues the final decision on accreditation. By law, the Minister must publish his or her reasons for passing a decision

that is contrary to the HAC's opinion. Institutions have the right to appeal the HAC's decisions based on legal grounds. The frames of reference for the HAC's decisions are the higher education act; the government decree on the HAC that details the delegation of HAC members and the tasks; the HAC's By-Laws, which include procedures of operation and tasks of the committees; the HAC's Accreditation Requirements; the HAC's Strategic Plan; and its Code of Ethics.

All higher education institutions which applied for accreditation have been accredited (about half for the full eight-year term), and about 70% of the programmes were accredited for the eight-year term, while less than 1% were closed. Almost all private higher education institutions applying for accreditation were accredited, though some had to re-submit their application. There are now 11 private HEIs in Hungary.

Accreditation in Central and Eastern Europe

Quality assurance in higher education in CEE countries began with the main aim to protect stakeholders by insuring the quality of higher education in the respective countries. It took the form of accreditation in almost all CEE countries from the start and is now being conducted in all countries. The reasons for this choice have been discussed in detail in the literature, but mainly had to do with the fact that higher education policy-makers, in conjunction with established academics, saw a form of control necessary at the time of regime change, whereby institutions were granted a certain degree of autonomy in exchange for allowing external control of the quality of the education they produced. In the given social-historical context the accreditation structure may have appeared as rigid and, indeed, the practice varies in the different countries. Other reasons for introducing accreditation in CEE countries was to protect stakeholders; to define quality standards and levels; to assure comparability of study programme content and level with those in Western Europe; and in some countries, most notably Romania and Bulgaria, to control the quality of education at proliferating private institutions. A survey showed that all quality assurance agencies professed an orientation toward helping higher education institutions to improve the quality of their education.

All CEE countries have national quality assurance agencies, although Poland until recently had only commissions set up with the voluntary co-operation of higher education institutions of various profiles. In recent years, as the new social structures are taking root, a development toward a more flexible implementation of quality assurance and a relaxation in the legislation can be witnessed. Higher education laws are being revised or new ones passed in several countries.

The Central and Eastern European Network of Quality Assurance Agencies in Higher Education was formally established on October 19, 2002 in Vienna as a non-governmental and non-profit organisation. The CEE Network has 18 members from 16 countries. The contribution of CEE agencies to the dialogue on quality assurance in Europe is to define educational and quality assurance strategies in each country; to co-operate among each other to define the needs and expectations for higher education and quality assurance; to channel their opinions to other European players in quality assurance; to participate in European projects in a pro-active way and to initiate own projects in order to arrive and mutually acceptable and comparable standards and methodologies in quality assurance.

2.6 ITALY: From Authorization to Accreditation – A Difficult Path for the University System in a Changing Society

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Why did the problem of "accreditation" seem to have surfaced in Europe only in recent years? I shall not attempt to give a general answer to this

question. I will rather try to explain why it was not an important issue in Italy until very recently and why accreditation is a difficult problem, in view of the many changes that the Italian University system is currently undergoing. The remarks presented here could also apply to other European countries, especially of continental Europe, and also to countries where the accreditation of universities has not yet come to full public attention.

We are in Rome, which is one of the oldest cities in Europe, and whose oldest university celebrates its 700th anniversary this year. I should be excused, therefore, if I go back to the medieval beginning of the Italian University system. After a brief period of spontaneous generation and growth, Italian universities, not unlike universities of other European countries, were established by an explicit act of a religious or civil authority, which authorised their activity conferring, in general, special privileges to the faculty and to the students.

Probably the first university explicitly established by a ruler, to fulfil a "political" mission, was the University of Naples, which has now assumed the name of its founder "Frederick II". It was indeed created in the first half of the 13th century, by Frederick II, Roman (which, at the time, meant "German") Emperor, and King of Naples. The University of Naples was established to contrast the political influence of the Law School of the University of Bologna, a city which, like most Italian cities of the North at that time, sided with the Pope, in the century long struggle for world supremacy between the Papacy and the Empire. Accordingly, Frederick II forbade his subjects to teach or to study at the University of Bologna. Similarly the Pope established the University of Rome, exactly 700 years ago in 1303.

At the end of the nineteenth century, when the Kingdom of Italy succeeded to the many sovereign states of the peninsula, the 22 universities operating in the Italian towns passed under control of the central Government. Government control meant that the charter approved by the Ministry of Education, explicitly listed the schools or faculties, which were authorised and the courses of instruc-

tions and degrees which these schools could offer. Even the selection of the professors hired to fill the chairs was organised on a national basis, moving away, in this respect, from the model of German universities, at the time the paradigm of a modern university system.

"Authorisation" automatically implies "accreditation" in a system which is rigidly controlled by a central authority. Under these conditions, there should be no need for a system of accreditation. Whatever is authorised is automatically accredited and it is the Government who is responsible for providing the necessary staff and facilities to the institutions for the courses of instruction allowed in their charters.

It is natural to ask why we talk of "accreditation" under these conditions, which are not far from the conditions under which operate many European universities. Is it because we blindly follow North American fashions and North American terminology, ignoring the fact that we operate in a very different context? Is it because small groups of bureaucrats, firmly entrenched in the Quality Assurance Agencies of each country, want to consolidate and extend their power over the university system?

There is, perhaps, a grain of truth in these explanations. But it is also true that an apparently minor change occurred in the relationship between the central authority and the university system in Italy, which has become one of the reasons to introduce "accreditation". The change can be synthesised as follows: in order to gain a better control over the university system, universities are given free rein on how to spend the money they receive from the Government, but the Government reserves the right to measure the level of financing against results achieved. Of course the Government fixes the priorities in terms of results.

This change came about when it was realised that the system of rigid control through authorisation, detailed regulation, and minute indications on how the money should be spent, made it impossible to control the growth and the global expenditure of the system. The growth of the university system through the seventies and the eighties in It-

aly was characterised by intensive lobbying by local authorities and politicians, and by academic groups, to obtain, even in absence of the necessary facilities, one or more "authorisations" to initiate new courses of instruction, or to give life to new universities. Very little attention was given to the problem of adequately financing the new institutions or the new courses of instruction. It was understood that the government would have to pick up the bill sooner or later.

For a while, until the late eighties, it was thought that the growth of the university system could still be controlled through "three year plans", approved by the Ministry on the advice of Parliamentary Committees. But the results were not particularly brilliant.

Finally, in the middle nineties it was decided that in order to control the expenditures of the university system it was more convenient to give the universities free rein in the allocation of resources obtained from the central government. Rather than footing the bill for each "authorised" activity, the Government would provide a global funding, measured on the basis of a "formula", based on indicators of results. In other words, the allocation of resources to universities was measured against objective results of university activity, rather than abstract needs. At the same time, universities were free to choose their own strategy in achieving their goals.

As a result, the universities are induced to compete for more money from the government and, as a consequence, for better performance. We have introduced what may be called a "simulation" of market conditions.

But as every economist knows, competition among service providers does not always produce positive effects. Any funding of university institutions which is based on "results" is heavily dependent on the number of students, or at least the number of graduates. The universities are thus induced to increase the number of students by offering new courses of study on topics attractive to students. This may lead to a form of deceptive publicity, which requires a corrective intervention on the part of the central authority.

In general, the type of "quasi-market", which is induced by the new system of financing the universities, requires that the offer of instruction on the part of the universities is "accredited", because of the "asymmetry" of information between users and providers of the instructional services. A central authority must define rules on the basis of which the providers of services are admitted to the market. Accreditation, a concept that only a few years ago could be ignored by Italian universities, and which seemed to apply only to the American system of higher education, has become an issue in Italy, and indeed in most European countries.

At the beginning we may have thought that accreditation should only apply to newcomers to the system, or perhaps only to universities which are not totally sponsored by the State. But as time passes these limitations appear less and less reasonable. Every institution is a "newcomer" when it starts a new course of instruction, or shifts its resources from one area to another. Indeed, the main practical difference between accreditation and authorisation is that the former is never permanent, but it is subject to periodic reviews. We must bring ourselves to accept that accreditation concerns the whole university system.

What do we mean by accreditation of a university? We must bear in mind that accreditation implies setting of "standards" for an activity, which traditionally prided itself in being above "standards". It is not too difficult to set minimal requirements in terms of number of permanent faculty, libraries, laboratories and other facilities. Much more difficult is to indicate reasonable standards of performance for a university. Let me state in this context just two of the many problems which could be raised.

One serious problem is the definition of the level of instruction suitable for a university education. Should it be defined independently of the level of competence and prior education of entering students? Or should it be calibrated on the actual level of the student body, no matter how low?

In Italy, as in most European countries, university education is no longer reserved to a élite. It is expected that the university system address itself

to a high percentage (at least 30%) of the population of young people. Under these circumstances the level of instruction must adapt to many different needs, expectations, and prior education of a diversified student body. It seems reasonable not to deny accreditation to an institution which takes upon itself the task of teaching students who do not meet the highest standards in terms of prior education. But if accreditation is supposed to have any relevance outside the university system, it should say something about the level of competence, which is expected of the graduates. We are registering here a conflict between the duties of the university system to address itself to a larger and larger percentage of the student population and the need to be accountable to the public and the prospective employers for the level of competence of the graduates.

A second problem, which is connected with the former, is the question of the role played by the scientific research of the faculty in the definition of a university. Is it still reasonable to expect that all university faculties be actively engaged in research? If so, does this mean that the standards for accreditation should include an evaluation of the research of the faculty? How far can a country afford a university system addressing itself to 40-50% of the population of young people, where all faculty members are allowed time and resources for creative research?

On the other hand, a university is traditionally the place where scientific research combines itself with teaching to provide an intellectual environment that should foster creative thinking. University teaching has been for the last two centuries the most important vehicle for the "transfer" of scientific and technical innovation to society and the productive world. Under these circumstances, a university without research may be considered a contradiction in terms. The solution adopted by some countries in the sixties, which was to create institutions of higher education which are not fully universities is now being abandoned, as the examples of England and Sweden show. Do we really have other solutions?

2.7 An Approach to Accreditation: The Path of the Italian Higher Education

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To understand the subject of accreditation in Italy it is important to focus the attention on some initiatives which have been recently taken by the *Ministero dell'Istruzione, dell'Università e della Ricerca* (MIUR) under the advice of the *Comitato Nazionale per la Valutazione del Sistema Universitario* (CNVSU) that have a strong impact on the whole university system. And it is also important for CNVSU to have indications, criticisms and ideas concerning these initiatives as they are a part of a strategy that aims at the gradual introduction of accreditation standards in the Italian university.

The basic idea is just to have gradual developments in the university system related to the use of general quality standards. In fact, graduality is a must in the present period that is characterized by two important changes: an increasing decentralisation of functions and responsibilities, and a complete modification of the university degree system.

Universities are going through a transition from a highly regulated to a more autonomous system. Faculties are facing with the difficulties of determining their objectives and qualifying their programmes to compete in a relatively free market of high education providers. This process does not occur only in Italy, is a global process started at European level. The implication is that there is a sort of increase of responsiveness of the university to society demands, and this concerns all the activities of university system: education, research, expertise.

The Italian education system enumerates 77 universities, 63 state universities and 14 non-state ones. Universities are the main institutions for the delivery of degrees at high education level, and of course for performing scientific research. Financing, funding and evaluating universities, is handled

at a ministerial level. The student population is in the order of 1.6 million students, but the number of regular students is smaller, about fifty per cent. One of the reasons is that not all students are full time students, many of them are part time, and this is a somewhat new reality. Indeed one of the difficulties that universities may have in offering educational programmes is just to take into account this diversification of the student population.

A second change has been then introduced with the Bologna process that caused a real revolution in the higher education system in Italy with the introduction of the two-level educational system and of the educational credits. Before the Bologna process, at the end of high school education, students could choose between a *diploma* course (a three-year course) and the traditional *laurea* course (from four to six years, depending on the subject). The *diploma* course has always been chosen by a small percentage of students, most preferred to get the more qualified, more common, more traditional *laurea* course, considering also that after *laurea* graduation there was the possibility, for a restricted percentage, to enter the PhD system. It was a rather rigid system, especially because it was ruled at a national level by a detailed regulation of the educational programmes. Even the name of the courses and the context of the single courses were ruled by law. The idea was to offer the same standard all over the country. Since the programmes were supposed to be the same everywhere, accreditation was considered not necessary. Of course, there were significant differences in quality among universities, but the principle was that the programme was the same everywhere as, once it was approved by the Ministry, it was automatically "accredited".

The new system is completely different, and it is very difficult to know the kind of graduates it is producing, as it started three years ago, and the first students are graduating just now. It is organised in two levels, a first level, with entering selection in some courses, and a second level, *laurea specialistica*, which is supposed to be culturally more professional in character. One year courses on specific professional subjects (in Italy they are called Masters) can be taken after both degrees, getting a first level Master or a second level one. Of course there is also the PhD school with a very restricted selection.

According to the rules of the new system, programmes on offer are classified on the basis of classes (42 for the first three year courses and 104 for the second level). The institutional mission of the educational programme of each class is broadly defined by law. Within each class there is a minimum number of credits for specific disciplines that are determined by law.

Universities, the providers, are expected to complete the programmes until the proper numbers of credits is achieved, which implies that roughly 60-70% of the programme is defined by universities, independently of any indication from the law. Even after the reform, the existing universities had maintained the rights of awarding degrees at all levels, including PhD programmes; in other words there are no restrictions for universities, and they can offer all the three levels of degree.

In principle each university is responsible for the quality of the educational provisions, but the Ministry set some basic quality standards, which higher education programmes are supposed to meet. As universities are autonomous, nothing prevents them from offering programmes that do not meet the standards, except the fact that they do not get funding. In principle, if they want to offer low quality courses, they could. This is the main problem; the increased freedom given to universities raises the problem of their accountability.

The introduction of the new system requires a period of adjustment, and it is necessary to adapt institutions and their high education programmes to the new reality. That is why it would not be so wise at the moment to determine rigid and detailed accreditation standards; it seems more convenient to use simple quality standards that can be helpful to guide the universities and the stakeholders in the transition. There is not an enough experience of the new system to allow a systematic accreditation of universities and courses.

One of the problems, definitively to be solved very soon, is whether to go in the direction of insti-

tutional or programmes accreditation considering that most universities have a long standing tradition, and it would be expensive, time-consuming, and probably not convenient now, to start an institutional accreditation process. Of course the situation is different for new universities, for which institutional accreditation can be performed to monitor their achievements, and check whether their standards in terms of educational offering, in terms of realisation and infrastructures, in terms of service to the students, are acceptable. This is indeed what CNVSU is doing at the moment, following the starting-up of new universities with site visits, checking their activities, while, in all other cases, that is to say long standing old universities, the Ministry decided to start a form of accreditation of the programmes on offer.

At the moment, most universities will complete the first cycle of the first level degree in the current academic year, and this means that the first students are going to get their three-year degree, while the first cycle for the second level degree starts just with the academic year 2003/04.

In this background there are at least two basic problems to be considered. The first one is the information on the educational programmes, as universities are free to determine their educational offer, there is a large variety of proposals of programmes, which differ in the design of the course and curriculum. How can students and stakeholders be guided towards the proper choice? The second problem is how to establish some accreditation procedures for these programmes, based on fundamental quality standards, to be improved while the transition goes on?

To better understand the situation it is necessary to spend few words on the Italian evaluation system. It has been introduced with the purpose of driving the system toward a better performance. It is based on a network with four main actors: Ministry, Universities, CNVSU, and the Internal Evaluation Units (IEU). CNVSU is an independent board of experts appointed by the Minister, with the task of advicing and consulting to the Minister, as all the decisions concerning the introduction of quality standards are taken by the Ministry. The

IEUs are self evaluation university groups of experts appointed by the Rector of each university. There is a systematic link between the CNVSU and IEUs: IEUs collect experience and data, while CNVSU provides methodology, feedback, indications, and suggestions. This is a kind of virtuous loop, which allows to systematically improve data, procedures and so on.

Getting back to the problem of information, one of the purposes of accreditation is to guarantee that potential students can attend programmes which pass through some processes of evaluation that ensures acceptable quality standards. In principle students should be given equivalent good quality education regardless of their choice of the higher education institution. They should be able to compare programmes of different universities, in order to choose the courses provided with good qualifications. Such a choice should be based on real and updated information about the quality of the courses rather than on perceptions. This is the reason why MIUR decided to create the database of programmes on offer (*Banca Dati dell'Offerta Formativa,* BOFF). This database has been established with the purpose of providing students with qualified and comparable information on the education programmes for all Italian universities. Students can get information by simply visiting the BOFF web site. Every year, each provider is expected to publicise education programmes on offer, as well as the curriculum design and the course organisation, through the BOFF database. In the same database the student can find information about the matching of **minimum quality standards** for educational programmes, set by the Ministry under the advice of the CNVSU.

Quality standards provide a quality threshold for all educational programmes. They are based on the principle of sustainable high education programmes. According to this principle a university is expected to offer programmes with a proper number of teaching professors, a proper size of the student class, a proper qualification and competence of the teaching staff, the availability of the necessary infrastructures (libraries, classrooms, teaching laboratories and so on). This could seem

a very obvious thing, but it is not always so obvious as, according to their complete autonomy, universities have to compete. Each university tends to attract more students and, to gain competitive advantage, it could deliver programmes without the proper quality.

This is a very basic and very rough form of accreditation, an accreditation in the sense that the outcome is a yes or a no, a match or non-match of standards. The threshold is not fixed once for all, but can be raised by further qualifications of all standards. Improving the standards is expected to induce a better quality of the programmes. This procedure does not aim at excellence, but has the purpose to make stakeholders confident with those educational programmes on offer that reach a certain level of quality.

It is interesting to look at the relation between this sort of accreditation and funding. As a result of the accreditation process, university programmes acquire a label, indicated in the (BOFF) database, so that stakeholders are informed of the achievement of the minimum quality standards, which allows them to be eligible for Ministry funding.

For this reason it is essential that the assessment be based on predefined standards and objective data, to ensure the transparency of the procedure. At the present stage, everything is based mainly on quantitative indicators, collected and treated in the proper way, to reduce the number of possible errors: data of programmes are linked with data concerning professors and students. An important role is played by IEUs, which are responsible for those aspects that cannot easily be expressed by numerical indicators. Just to give some results, in the academic year 2001/02 there were 2.650 first level course programmes set up for 190 faculties. Approximately 75% of the faculties complied with the minimum quality standard qualifications in all the programmes, 25% of faculties did not comply, that means that 25% of the faculties had some programmes which were not acceptable. This was just an experimental approach starting with a rough kind of quality standard, like for example the number of professors, not their qualification.

As expected, the most difficult situation was in the most crowded faculties like Economics, Law, and Humanities in general. The percentage of programmes in these faculties which did not fit all the quality standards, was of the order of 20–35%. Not only crowded faculties, also recently established universities, had insufficient infrastructures, and sometimes also an inadequate teaching staff.

In the second year (academic year 2002–2003) CNVSU started improving the threshold, including a criterion of the proper qualification of the teaching staff involved in the programmes. This implied a check on the disciplinary specialisation and personal research area of professors, linking this to the setting up of the course programmes. Of course, the target was not that 100% of the professors had to be in the right scientific area, as some basic courses can be taught by professors of different specialisations or from external experts, but at least 40–50% of the professors had to have the right qualifications. The results obtained by introducing this threshold are somewhat different: in some cases the situation has gotten worse, since including more qualified standards caused more faculties not to meet the quality thresholds. In other cases it turned out to be better, because some programmes of the previous year, which did not meet the standards, had been cancelled in the meanwhile by the universities.

The introduction of more severe quality standards has led to a reduction of the accredited programmes and to serious problems in recently established universities. In other cases there has been a significant reduction of the programmes below the standards, largely as a consequence of the decreased number of programmes on offer by some universities. In other words, after the first experiment, some universities realised that they were actually offering more than they could afford, so some programmes had to be cancelled. This is not surprising in an experimental transition, as maybe universities realised to have designed not so an appealing offer, or that the evaluation system of quality did not allow to consider the offer as a valuable one. This is the present stage of accreditation for the first level degree.

The second level degree started in the academic year 2003/04 with three possible requirements indicated by CNVSU: (i) proper publicisation of the access, (ii) attractiveness and (iii) scholar scientific production. The publicisation of the second level programmes is very important, because entering the second level is a different step in education. The offer should specify the conditions to be registered, the number of proper credits, the nature of the accepted credits, the nature of the accepted degree, and how to acquire missing credits. Attractiveness is a very important issue, as in Italy students generally show a low mobility. They usually choose the nearest university rather than the one which maybe the best for them. This maybe acceptable for the first level degree, but not for the second level, that is supposed to be highly professional. The idea is to have some standards of attractiveness, and if a university is not able to attract students from other regions or from abroad, maybe it could be indicated as not meeting the essential quality standards.

All the issues, we have been dealing with so far, concern an ex ante accreditation, something which refers to the offer and not to the outcome. The reform of the educational system has established the general purposes and achievements of any class of programmes, and this means that the next step will be to look at the outcome, to have some assessment of the results of the educational process. There are several issues to be analysed, like the characteristics of the educational process, the professional achievements, the rating of the graduates on the job market, and so on.

Some important steps have been taken by CNVSU in order to have the necessary tools for the analysis of the results of the educational programmes. An information system has been set up that provides every year data on the student status in each programme (failure rates, success rates, satisfaction of students, …). It is still a quantitative element, not qualitative, but of fundamental importance.

CNVSU introduced also a feedback questionnaire to be filled in by the students at the end of the programme, with a minimum set of questions. As a result now nearly 60% of the teaching courses in the programmes have a feedback by students.

Another step is the introduction of a questionnaire for the students that get the degree, before they leave the university. This allows them to give a global judgement of the university experience.

Moreover the Ministry has supported the realization of an important database, *Alma Laurea*, which allows to get information on the professional status of graduates five years after the end of their university programme. This should be a good step towards an analysis of what comes out from our high education system.

Italy is in its early stages of accreditation, in its infancy, and this could be common to other European countries, but some important results have been achieved in the direction of sustainability of higher education programmes, and CNVSU is working strongly to prepare tools for a wider accreditation.

2.8 THE NETHERLANDS: Accreditation in the Netherlands

Karl Dittrich, *Vice-President, The Netherlands Accreditation Organisation, k.dittrich@nao-ho.nl*

1. Accreditation in the Netherlands has been introduced in the reform of Dutch H.E. towards the bachelor-master structure. Accreditation is seen as the independent proof that a certain quality-level has been reached by a programme.

During the discussions between minister and H.E.-institutions, and minister and parliament, four goals for accreditation have been mentioned:

a. Accountability: politics, public opinion, the "taxpayer" ask from H.E.-institutions to be accountable for what they do with the money the government funds them with. Accreditation is one of the methods to show that quality has been delivered

b. Funding: government has obliged H.E.-institutions to let the programmes be accredited before they will get funded

c. Mobility-enhancement: if Europe really wants to be the most dynamic and innovative knowledge-economy then Europe should be developed as one labour-market with a European labour-population. One of the essential prerequisites therefore is the enhancement of mobility. Accreditation is one of the possible ways to improve comparability between programmes.

d. Information facility: accreditation may be used as a possibility for giving information to students, employers and the public. Of course, students and employers should be able to make a distinction between all different programmes, so for reasons of information only accreditation would not be enough.

2. Much to my surprise, most stakeholders have accepted accreditation as a fact of life in a very short time. Of course, some objections were raised, especially from the universities and one particular political party: they feared that institutions and programmes would only strive for the minimum-demands necessary for getting the accreditation decisions. Eventually, one chose for the following system:

a. Obligatory accreditation: necessary because of the funding-demand, each six years

b. Programme accreditation: two reasons for that:
   – A well-known institute should not necessarily execute only good programmes
   – Deinstitutionalization of the binary system. Universities were allowed to teach professional programmes whereas universities of professional education were allowed to teach academic programmes (as long as they reach the prerequisites for accreditation of these specific programmes).

c. Accreditation should be developed in line with the well-known and broadly accepted Dutch Quality Assurance system and it should not be developed as a new bureaucratic system parallel with the Q.A.-system. NAO decides on the basis of reports by quality agencies. All programmes that want to deliver degrees acknowledged by the Dutch government and want study-grants for their students younger than 30 years of age should be accredited. This means that all programmes by public as well as private institutions have to be accredited.

d. All accreditation-decisions have to be made public

e. An appeal is possible

3. Netherlands Accreditation Organisation (NAO) has been established as an independent body in June 2002.

a. Board of three fulltime members and four part-time – fulltime members are three former university presidents, who are resigned from their universities. Part-time members are the former minister of Education, two people with ample experience from industry, and one from the public sector.

b. Budget is 3.6 million euro pro year, which means that programmes only pay a small fee for accreditation – each accreditation-application costs 2.500€.

c. Staff of 20 people, ranging from lawyers to experts in all different disciplines

d. The NAO has developed frameworks for:
   – The accreditation of existing programmes
   – The advising on the perceived quality of new programmes – eventually the minister takes the decision whether or not a new programme may start. These programmes must have had a positive advice by NAO.
   – "Registration" of the Quality Agencies of which NAO thinks that they can deliver good and fair reports
   – Some specific new programmes, for instance the research-masters and programmes that want to enlarge the period of years a master will take.

4. Starting points

a. Respect for the field of H.E. No one is purposely presenting a bad course. As former participants in the field of H.E., we are convinced that most

programmes have a sufficient level to get accredited. We are not the accreditation police!

b. As close as possible cooperation or alliance with the existing Q.A.-system to keep the improvement-function of the system going.

c. No more bureaucratic burden or high costs. The burden of the quality assurance-system is already high enough.

d. Development of a framework that is compatible to international developments. We want our system and the framework to be in line with the international developments.

e. Close cooperation and dialogue with the institutes of H.E. I strongly believe that the institutions themselves and their staff should have the conviction that accreditation is sound and fair. They are the ones that give the system the necessary legitimation.

5. The accreditation decision is dichotomous, it is either yes or no; in the Netherlands there is no conditional or provisional accreditation. As a result, there are four possible accreditation results: professional bachelor, academic bachelor, professional master and academic master.

Between academic and professional programmes exists a rather clear distinction:

• Differences in aim and goals of the course;
• Differences in content;
• Differences in quality of staff, esp. research experience;
• Differentiation in relationship with the professional field: very strong in the professional orientation, weaker in the academic orientation.

The Accreditation Process

6. Accreditation is based on an application by an institution. The basis for the accreditation-decision is a report by an external panel. The report has to be based on the accreditation-framework, developed by our accreditation organization.

The external panel has to be appointed by – preferably – a registered Quality Assurance Agency. Up till now, five agencies have applied for registration and three applications have been rewarded.

We have judged the agencies on 5 points:

a. The organizational and financial independence;
b. Their competence to compose panels of the required quality and diversity;
c. Their guarantees of the independence of the members of the panel and their way of conducting the evaluation-process;
d. The operationalisation of the NAO-framework;
e. Their competence to compose a domain-specific framework for validating the specific course.

Each institute or program is free to select an agency. They may do this on the basis of the price, proven quality, or method of executing the process. By and large, you might say this is a strategic decision following the choice for a profile a programme has made.

7. Let me elaborate on the composition of the panel. We demand:

• Disciplinary expertise;
• Educational expertise;
• Audit expertise;
• A student;
• International expertise or knowledge of the international developments in the field (where appropriate);
• Professional expertise/expertise from the professional field (where appropriate).

Of course one person may combine several expertises, but we obliged a panel to be composed at least of 4 persons (of which one is a student). This is called the GOD-criteria: Gezaghebbend, Onafhankelijkheid en Deskundigheid – Authority, Independence and Expertise.

8. The panel will execute their work on the basis of:

• Desk research: a thorough examination of a programme's self study, self-evaluation or management review;
• Site visit of two days, in which they will see the programme management, teaching staff, students, facilities, the examinations, final theses and if appropriate alumni and employers.

The judgement must be presented to staff and management, who – hopefully – will use the report to improve the course-quality and to apply for accreditation by NAO.

9. The NAO-framework

The framework has been composed of 6 subjects, 21 aspects and 30 criteria. Deliberately, they are made open, so that programmes themselves, the panels or the quality assurance agencies are able to operationalise them on the basis of their needs and wishes. Of course, the report that is part of the application must explain how the criteria are operationalised. Generally, the Q.A. use a general framework (which they presented to us during their application for registration), but they are completed with domain-specific criteria.

The subjects have to be judged as sufficient or not sufficient. In order to receive a positive accreditation all six subjects must be judged as "sufficient". Each subject consists of a number of aspects, varying from two to eight. These aspects have to be judged on a four point scale: insufficient, sufficient, good or excellent. This has been done to find "best practices" and to give the panel the possibility to weight the different aspects. An "insufficient" on one aspect may be countered by a "good" or an "excellent" on another aspect, so that the subject itself might be valued "sufficient" after all. Panels have to give an argumentation for their judgements on aspects and subjects.

10. Special features

a. Extraordinary elements of quality. These may be part of the accreditation report, although they don't have any influence on the accreditation outcome: it is an extra.

They may be for instance:

- Pedagogical system (for instance Problem Based Learning);
- Internationalization (composition of staff and students);
- Excellent relation with the workfield;
- Excellent quality.

Also, these special features have to be judged by a panel, in order for the NAO to validate the claim from the institute or programme.

11. International relations

a. From September 3, 2004 onwards, NAO is to be the accreditation organization for the Flemish part of Belgium as well. An agreement between the two governments has been reached. Netherlands Accreditation Organization will be the Dutch-Flemish Accreditation Organization. Two more full time members of the board, four more part-time members; staff will be enlarged with nine more people. The H.E.-systems in Netherlands and Flanders look largely the same, but there are differences, which have to be taken into account in the frameworks and the procedures.

b. ECA: officially founded in Cordoba, November 2003.
   – Goals: to understand and improve each other's stand on accreditation to get "mutual recognition" of accreditation decisions.
   – Membership: officially recognized agencies that work with accreditations or accreditation-like procedures:
   Germany: Akkreditierungsrat and organizations that have been recognized by the Akkreditierungsrat
   Austria
   Switzerland
   Ireland: HETAC
   Norway: NOKUT
   Spain: ANECA
   Netherlands/Flanders: NVAO
   – Five working groups: "mutual recognition", "common framework of qualifications", "publication of accreditation results", "Ministers' conference in Bergen", and "development in the field of accreditation".

2.9 NORWAY:
Quality Assurance of Norwegian Higher Education

Tove Blytt Holmen, *Deputy Director General, Norwegian Acency for Quality Assurance in Education (Nokut), tbh@nokut.no*

The higher education sector in Norway

The majority of Norwegian higher education institutions are owned by the state: four universities, six specialised institutions at university level, two academies of fine art and 26 regional university colleges. More than 90 per cent of the student population in Norway attend state institutions.

A few specialised institutions at university level are private. The private sector is otherwise made up of a number of fairly small institutions. The main academic fields of private higher education are business and management, ICT studies, theology, nursing and health care and teacher education.

Legal and regulatory framework; the 'quality reform' (2002)

Norwegian higher education is regulated by two laws:

- *The Universities and Colleges Act* regulates state-owned institutions and their right to establish programmes and award national degrees. This law also regulates the quality assurance of higher education.

- *The Private Colleges Act* regulates private institutions' right to award national degrees and their access to public funding. Benchmark for the recognition of private higher education has hitherto been corresponding provision in institutions under the Universities and Colleges Act.

Both laws were recently amended (2002) in connection with the Government's 'quality reform' of higher education'. The amendments represent the first stage in a process with the aim of merging the two laws into one and thus create greater equality between state and private institutions.

The reform process also:

- changed the degree structure in accordance with the recommendations of the Bologna Declaration
- increased institutional autonomy
- imposed a stricter obligation for institutions to follow up students actively
- introduced a system of formal accreditation for all higher education
- imposed stricter demands in the field of quality assurance.

Quality assurance at the institutional level: internal quality assurance systems

Each institution is responsible for the quality of its own educational provision. There is nothing new in this responsibility as such, but the institutions will now be required to demonstrate how responsibility for quality is followed up with actual quality assurance. After the reform, a prerequisite for the status of an accredited institution will be the existence of an *internal system of quality assurance* that complies with nationally set criteria. The institutions are expected to have such systems in place by 1 January 2004.

Quality assurance at the national level: NOKUT

The Norwegian Agency for Quality Assurance in Education (NOKUT) takes care of quality assurance at the national level. The agency, replacing the former Network Norway Council, became operative on 1 January 2003. Unlike its predecessor, NOKUT is not a part of the government structure and acts independently inside a given framework of law and a Ministerial Regulation. Its main tasks are to:

- make all accreditation decisions concerning higher education that go beyond the institutions' self-accrediting powers. These decisions cannot be modified by any other authority.
- evaluate and pass judgement on the institutions' internal quality assurance through quality audits, carried out in regular cycles and including all accredited institutions. In addition to act as a

control mechanism, the audits are conducted in a way that is conducive to quality enhancement.

- carry out evaluations with the purpose of revising specific accreditation. Any institution can have accreditations revoked or suspended – for the entire institutions as such, or for individual programmes – following a negative assessment in this type of evaluation.
- carry out other types of evaluations with the general purpose of investigating, assessing and developing the quality of higher education in Norway. The Ministry may instruct NOKUT to undertake such evaluations.
- issue general recognition – or credit count towards national degrees – to higher education from other countries, or to any other education that is not regulated by the Universities and Colleges Act or the Private Colleges Act. This is a power it shares with accredited institutions.

Accreditation

As from 1 January 2002 accreditation is mandatory and universal for all formally recognised higher education in Norway. Accreditation is not limited to a specified period of time but will be considered as valid until explicitly revoked, following an assessment. The new accreditation formula combines institutional and programme/course accreditation:

Institutional accreditation gives universities and colleges certain rights to award national degrees or diplomas.

- When the law amendments became operative on 1 January 2002, all state-owned institutions were automatically given status as *accredited institutions* with certain degree-awarding rights. These rights vary with institutional category, of which there are three:
  - *University:* (Full awarding rights at all levels, including doctoral programmes);
  - *Special-field university:* (Full awarding rights at all levels within given special field);
  - *College:* (Full awarding rights at the bachelor degree level).
- No private institutions were automatically given status as accredited, but may obtain it

through a process of institutional accreditation, for which a national set of standards has been given. Applications can be made for any of the three categories and by May 2003 two private institutions have applied, one to become a full university and the other to become a special-field university.

- By the same standards, state institutions may seek accreditation in a different ('higher') category, following a process of institutional accreditation. By May 2003 one such application has been registered, where a special-field university seeks status as full university. Three university colleges have declared their intention to apply for university status.

Programme accreditation may be obtained for specific courses or programmes that the institution is not institutionally accredited to provide.

- All higher education programmes and courses – in state or private institutions – that were recognised under the previous guidelines by 1 Jan. 2003 were automatically given status as accredited.

- New provision in accredited institutions that goes beyond the awarding rights that follow from institutional category must be accredited after a process and in accordance with national sets of standards (e.g. master degree programmes in institutions of the college category).

- All new (or not previously recognised) provision in unaccredited institutions must undergo such a process in order to become accredited.

Accreditation control

Accreditation control is carried out through a combination of institutional audits and specific programme or subject assessments, referred to as 'revision':

- *Institutional audits* represent the systematic, comprehensive mechanism for external scrutiny of the quality of higher education. Institutional audits will be conducted in all accredited institutions, irrespective of category, and there must not be more that six years between each time an

institution is evaluated. The frame of reference for these evaluations is made up of the national criteria that have been set for internal quality assurance systems, which among other things demand that these systems must be able to detect inferior quality, and that quality assurance must be adequately documented. Failure to provide internal quality assurance in accordance with the criteria will have as a consequence that the institution cannot any more offer new provision. But the audits cannot in themselves lead to the loss of accreditation.

- *Revision* of accreditation will take the form of a specific (programme, course, discipline, or even institutional) assessment, directed at an identified unit of education. Revisions will be triggered by indications from the audits, but also by other indications, and they may be carried out as random tests. A negative result will lead to the loss of accreditation, and consequently to the loss of public funding.

Standards and criteria for accreditation

a) Institutional accreditation:

General standards for institutional accreditation in any of the three categories are set by Ministerial Regulation. The Regulation authorises NOKUT to develop a further concretisation of these standards in the form of more detailed assessment *criteria*. The criteria, which have been developed after consultations with the sector, concern internal quality assurance, academic competence levels, research activities, the number and levels of existing programmes, internationalisation, infrastructure and institutional organisation and management.

b) Programme accreditation:

For the accreditation of individual programmes, both the standards and the more detailed assessment criteria are set by NOKUT, again after consultations with the sector. These standards are generic descriptors for types of degree programmes, as defined by their level and credit volume (2-year programmes; bachelor programmes; master programmes; doctoral programmes.) Specific national quality criteria for the different disci-

plines or subject areas have not been defined. It should be noted, though, that a few programmes aimed at professions (notably teacher education) are regulated in more detail by national curriculum guidelines.

Standards and criteria for internal quality assurance

A brief and general *standard* for the institutions' internal quality assurance systems is set by Ministerial Regulation, indicating what these systems should include and achieve. This standard, in turn, has been further developed by NOKUT through a set of *assessment criteria* that will be applied in the institutional audits. Institutional audits are not formally accreditation procedures and the assessment criteria are not the same as absolute standards.

The proposed criteria are developed from two basic considerations: that quality assurance systems should aim at both control and enhancement and that the criteria should focus on *system quality* rather than on any specific quality assurance methods or measures.

The criteria focus on (i.a.) the following features:

- That the QA system is linked to institutional steering and management and made an integral part of the institution's strategic work.
- That quality work is organised in routines and measures that ensure broad participation throughout the institution, with defined distribution of responsibility and authority.
- That documentation from all study units (including franchised provision) is sufficient, and that it always includes the students' assessment of the programmes they attend.
- That documentation is analysed, summed up and reported.
- That quality assurance and quality work is accounted for in annual reports to the institution's board.

All standards and criteria for accreditation and the evaluation of quality assurance systems are presented *in extenso* on NOKUT's website: www.nokut.no.

3 Conclusion

Ko Scheele, *Inspector, Inspectorate of Education in the Netherlands, k.scheele@owinsp.nl*
Kimmo Hämäläinen, *Coordinator, ENQA, kimmo.hamalainen@minedu.fi*

Introduction

In the Berlin Communique of 2003 the European Ministers pay high attention to higher education quality assurance. They expect by 2005 the quality assurance agencies to fulfil action "to develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies". Moreover they challenge the national higher education systems: "By 2005 national quality assurance systems should include:

- A definition of responsibilities of the bodies and institutions involved;
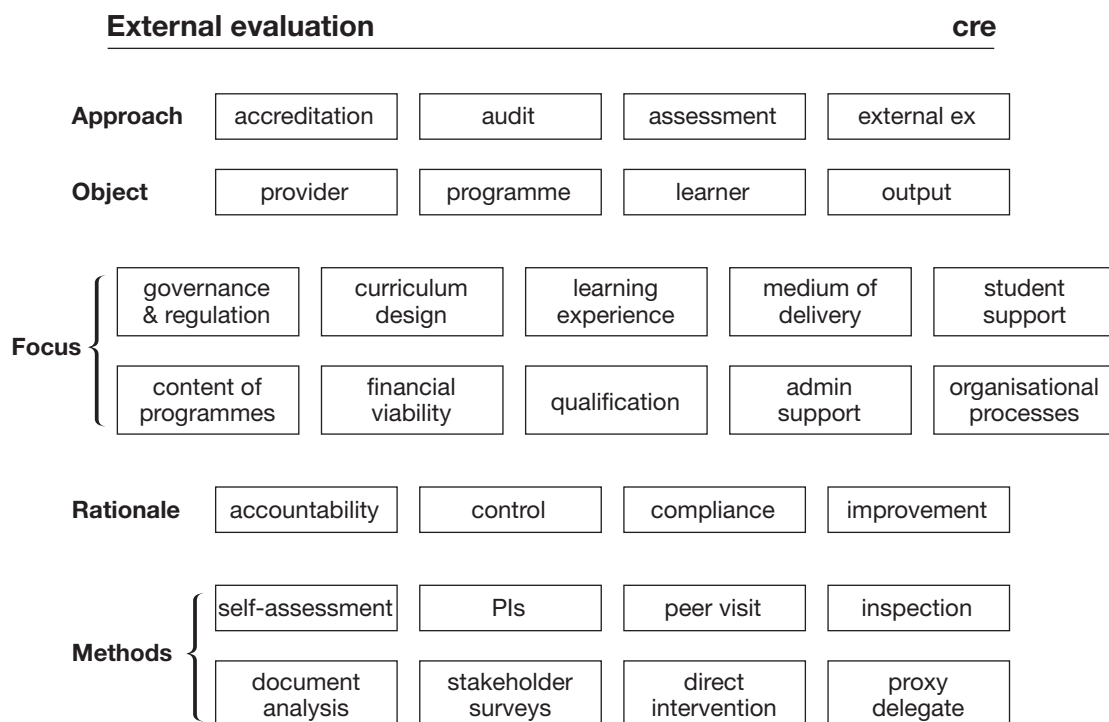- Evaluation of programmes or institutions, including internal assessment, external review, participation of students and publications of the results;
- A system of accreditation, certification or comparable procedure;
- International participation, co-operation and networking.

The ENQA workshop focused on accreditation in Europe. About 50 experts of 17 countries concluded that the two days of work in Rome were able to cover in detail both the above-mentioned European and various national perspectives of accreditation, described elsewhere in the report.

Accreditation concepts, scope and working methods

Due to the European ministers' inclusion of accreditation into their Berlin Communiqué of

External evaluation   **cre**

Approach	accreditation	audit	assessment	external ex

Object	provider	programme	learner	output

Focus	governance & regulation	curriculum design	learning experience	medium of delivery	student support
	content of programmes	financial viability	qualification	admin support	organisational processes

Rationale	accountability	control	compliance	improvement

| Methods	self-assessment	PIs	peer visit	inspection
	document analysis	stakeholder surveys	direct intervention	proxy delegate

2003, this widely used method of quality assurance has become an important part of European quality assurance framework, and accrediting countries have accordingly increased their mutual cooperation in order to learn from one another and to share experiences. The European accreditation Association ECA, consisting of accreditation agencies of various countries was recently established (November 2003, Cordoba).

Accreditation in this report fits as a tool in the broader concept of higher education quality assurance. The contributions showed a large variety on accreditation concepts, scope and working methods. Accreditation is a used both to validate institutions and study programmes. Sometimes it is used only in the case of new study programmes, while in other countries all study programmes are (to be) accredited.

Despite the differences, it is interesting to notice that there is convergence, not due to homogenisation but due to comparable use of the various instruments. Moreover: a national agency uses various instruments varying along the evaluation object, the focus and the rationale. Also, there is a change of approach visible after several years of evaluation e.g. accreditation after a decade of programme-assessment, or programme accreditation

after a decade of audits. This, of course, is due to the phase of evaluation and evaluation culture in the given country. This tailor-made approach seems valuable as it responds to the rapidly increasing variety of higher education.

One of the conclusions was that recently some considerable effort has been put into the developmental aspect of accreditation, that is, accreditation will be more and more used to issue recommendations to the evaluated institutions and programmes, as compared to an earlier concentration on definitive yes/no decisions. Conditional accreditations are also used, thus bringing the concept of accreditation closer to regular evaluations, where encouragement for institutional development is a crucial objective. Qualitative accreditation has become increasingly visible beside the quantitative one. An important subject is the focus of accreditation. The workshop discussed the aim of learning outcomes, in particular the distinction between fitness of purpose (the goals and aims) and fitness for purpose (the way these were made practice towards and the effects on students). The European qualification framework given in the Bologna Declaration is a good starting point. Agencies and the higher education institutions are challenged to prioritise this. The so-called Dublin descriptors are
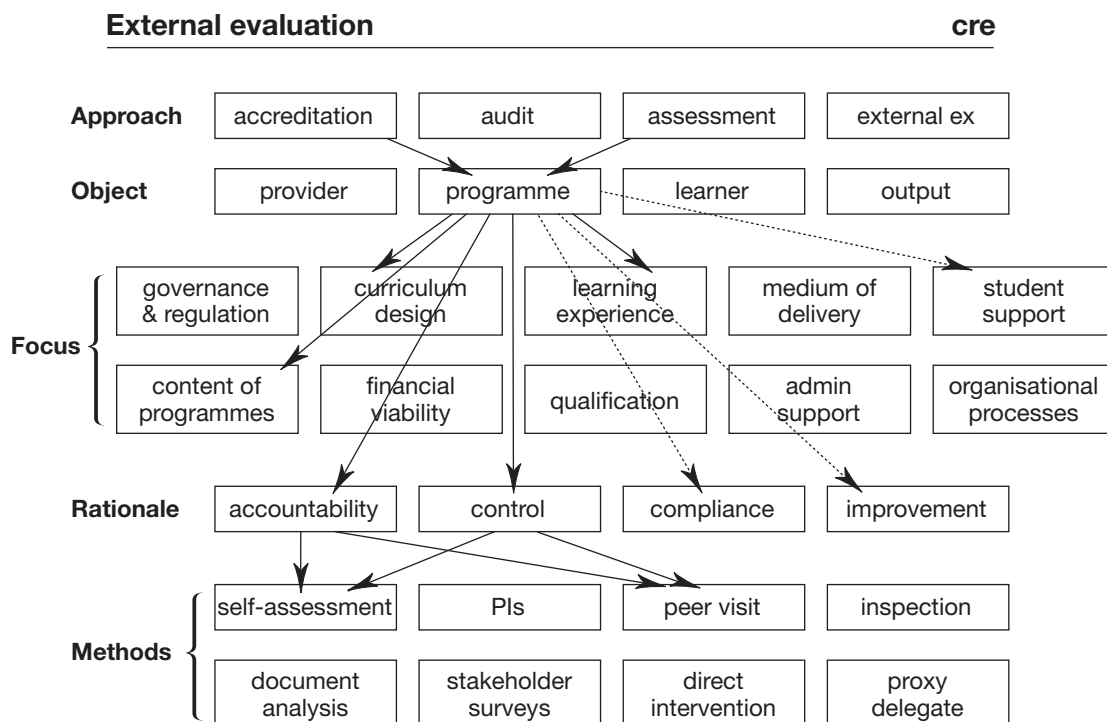
also of use, but they need refinement in the given national context and discipline.

The discussion on accreditation also highlighted critical success factors:

- The accreditation costs are seen as investments;
- Accreditation is of use for the internal quality assurance mechanisms;
- Accreditation effects are in line with the costs (both in time and money) e.g.:
  – Quality enhancement noted by students and employers/society;
  – Mobility of students as result of transparent accreditation decisions;
  – Few appeals.

The workshop discussed the dilemma of how to bring more objectivity into accreditation systems so that decisions are, and are also acknowledged by the accredited institutions, made according to as comprehensive an amount of information as possible. Attention was given to peer review as basis of accreditation:

- Renew peer review panels periodically;
- Allow young professors to enter into the panels; it is not always obvious that high 'ranked' university professor are interested in undergraduate education;
- Training of peers by the agency is important;
- The agency should facilitate the panel during the whole procedure, including update information
- International peers are of use, but be aware of the threat of 'cultural imperialism' (especially the Anglo Saxon countries have a language advantage);
- Use existing data of the given institution and vary the method; mind large self evaluation papers (which are descriptive and not analytical and not self-critical).

A notice was also given to the fact that in many countries accreditations are in fact based on evaluation decisions, showing clearly that it may be relevant to address in more detail synergies between evaluation and accreditation in a follow-up workshop, for instance.

And last but not least, take your own medicine: 'practice what you preach'! Not only transparent procedures and reports are useful, an external evaluation of the agencies themselves would be of value for the recognition of the system.

Appendix

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WORKSHOP
ACCREDITATION MODELS IN HIGHER EDUCATION
EXPERIENCES AND PERSPECTIVES
Italy, Rome, 13–15 November 2003

GOALS

✓ Understanding the principles of the various accreditation methodologies and models in higher education
✓ Examples of possible good practices on the basis of country case studies
✓ Discussing and evaluating usefulness of accreditation activities, strengths and weaknesses
✓ Recommendations for the future

WORKING METHODS: KEYNOTERS, PLENARY DISCUSSIONS, COMPARATIVE WORKSHOPS AND A PROBLEM MARKET

1. Context of accreditation

✓ Background for accreditation in European Higher Education
✓ Range of definitions used for accreditation
✓ Range of methodological approaches to accreditation in higher education

An inventory "problem market" will be implemented dealing with critical issues:
✓ Mutual accreditation policies
✓ Strengths and weaknesses of the various approaches
✓ …

2. Country case studies

Presentations on the following issues:
✓ Scope of accreditation
✓ Models, methods, targets and procedures of accreditation
✓ Achieved results, experiences, and lessons learned

3. Results and perspectives

✓ Results, conclusions and recommendations of the workshops
✓ Future perspectives

TARGET GROUPS

✓ Staff of ENQA member agencies
✓ Accreditation & Quality Assurance experts suggested by ENQA member agencies
✓ Ministerial Representatives of ENQA

PROGRAMME

Thursday, 13 November 2003

15.00 – 16.00 *Registration and welcome coffee*

Opening

16.00 – 16.30 **Opening remarks,** *Luigi Biggeri,* CNVSU Vice President

Welcome words, *Alessandro Bianchi,* CRUI

Kimmo Hämäläinen, ENQA Coordinator

Plenary Session

Chair: *Luigi Biggeri*

16.30 – 17.00 **An approach to accreditation: the path of the Italian Higher Education**

Carlo Calandra Buonaura, CNVSU Board

Primiano Di Nauta, CNVSU

17.00 – 17.15 **Discussion**

17.15 – 17.45 **Accreditation, an irregular perspective**

Ko Scheele, The Inspectorate of Higher Education, The Netherlands

17.45 – 18.00 **Discussion**

18.00 – 18.30 **Inventory problem market**

Ko Scheele

18.30 *Cocktail*

Friday, 14 November 2003

09.30 – 10.00 **ENQA in the Bologna Process**

Christian Thune, ENQA Chairman

10.00 – 10.30 **Discussion**

10.30 – 11.00 *Coffee break*

Parallel workshops

	Moderator	Workshop I *Helmut Konrad*	Workshop II *Angelika Schade*	Workshop III **Ko Scheele**
11.00 – 11.40	Introductions: scope of accreditation ✓ accreditation in the national context ✓ new programmes vs. whole system ✓ public and/or private institutions ✓ institutional or programme approach ✓ consequences	**Norway** *Tove Blytt Holmen* **Austria** *Kurt Sohm*	**Germany** *Hans-Uwe Erichsen* **Italy** *Alessandro Figà-Talamanca*	**Netherlands** *Karl Dittrich* **Hungary** *Krisztina Rozsnyai*
11.40–13.00	Group discussion	Group discussion	Group discussion	Group discussion

13.00 – 14.45 *Lunch*

Plenary Session

14.45 – 15.15 **The Power of Accreditation: views of academics**

Lee Harvey, Centre for Research and Evaluation, Sheffield Hallam University, Director, UK

15.15 – 15.45 **Discussion**

15.45 – 16.00 *Coffee break*

Parallel workshops

	Moderator	Workshop I *Kurt Sohm*	Workshop II *Angelika Schade*	Workshop III *Ko Scheele*
16.00 – 16.40	Introductions: working methods ✓ commissions/panels, peers, working field, students, stakeholders ✓ frames of reference ✓ information bases ✓ procedures ✓ report	**Norway** *Tove Blytt Holmen* **Germany** *Hans-Uwe Erichsen*	**Hungary** *Krisztina Rozsnyai* **Austria** *Helmut Konrad*	**Netherlands** *Karl Dittrich* **Italy** *Muzio Gola*
16.40 – 18.00		Group discussion	Group discussion	Group discussion

18.45 *Rome by night sightseeing and dinner*

Saturday, 15 November 2003

Plenary Session

Chair: *Luigi Biggeri*

09.30 – 11.00 **Accreditation concepts, scope and working methods: outcome from the three workshop sessions**

> *Angelika Schade, Ko Scheele, Kurt Sohm*

11.00 – 11.30 **Discussion**

11.30 – 11.50 *Coffee break*

11.50 – 12.50 **Problem market**

> *Ko Scheele,* The Inspectorate of Higher Education, The Netherlands

12.50 – 13.00 **Closing remarks**

> *Luigi Biggeri,* CNVSU Vice President